

06.09-5/1/01-3016

Final

No Action
Decision Document
Site 12
MCB, Camp Lejeune, North Carolina



Prepared For
Department of the Navy
Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia

Contract No. N62470-95-D-6007
CTO-0120⁷

May 1, 2001

Prepared by

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ATTACHMENTS

A	State of North Carolina Approval Letter
B	USEPA Region IV Approval Letter

ACRONYMS AND ABBREVIATIONS

Baker	Baker Environmental, Inc.
bgs	Below Ground Surface
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
COPC	Contaminants of Potential Concern
DD	Decision Document
DON	Department of the Navy
EOD	Explosive Ordnance Disposal
FFA	Federal Facilities Agreement
FS	Feasibility Study
LANTDIV	Atlantic Division Naval Facilities Engineering Command
MCAS	Marine Corps Air Station
MCB	Marine Corps Base
NA	No Action
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NFRAP	No Further Remedial Action Plan
NPL	National Priorities List
NC DENR	North Carolina Department of Environment and Natural Resources
PA	Preliminary Assessment
Pre-RI	Pre-Remedial Investigation
RI	Remedial Investigation
RI/FS	Remedial Investigation/Feasibility Study
RA	Removal Action
SARA	Superfund Amendments and Reauthorization Act
SI	Site Inspection
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
µg/L	Micrograms per Liter
UXO	Unexploded Ordnance
VOC	Volatile Organic Compound

DECLARATION

SITE NAME AND LOCATION

Site 12
Explosive Ordnance Disposal (EOD) Range, MCB, Camp Lejeune
Camp Lejeune, North Carolina

STATEMENT OF BASIS

This No Action (NA) decision is based on the results of a Pre-Remedial Investigation (Pre-RI) Screening Study conducted at Site 12 in October 1995. The Pre-RI Screening Study included a review of previous investigations, installation of groundwater monitoring wells, and associated soil and groundwater sampling. The Department of the Navy (DON) and the Marine Corps have obtained concurrence from the State of North Carolina Department of Environment and Natural Resources (NC DENR) and from the United States Environmental Protection Agency (USEPA) Region IV on the selected remedy. Copies of the NC DENR and USEPA approval letters are presented in Attachments A and B.

DESCRIPTION OF THE SELECTED REMEDY

Based on the current conditions at Site 12, it has been determined that no threat to public health. Therefore, no action under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), is warranted.

DECLARATION STATEMENT

This NA Decision Document (DD) represents the selected action for Site 12, developed in accordance with CERCLA, as amended by SARA, and the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). Because contaminant levels at the site present no known significant threat to human health, it has been determined that no action is protective of human health, attains federal and state applicable or relevant and appropriate requirements (ARARs), and is cost-effective. The statutory preference for treatment is not satisfied because no treatment was necessary at Site 12. The site was not evaluated for unexploded ordnance (UXO) or metals. Site 12 is an active range which is included in the Camp Lejeune Range Evaluation Program. Metals and UXO will be addressed through this program.



Signature

N. Neal Paul
Head, Installation Restoration Branch
Installation and Environment Division
Marine Corps Base, Camp Lejeune, NC

5.08.01

Date

DECISION SUMMARY

1.0 INTRODUCTION

Marine Corps Base (MCB), Camp Lejeune was placed on the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) National Priorities List (NPL) on October 4, 1989 (54 Federal Register 41015, October 5, 1989). Subsequent to this listing, the United States Environmental Protection Agency (USEPA) Region IV; the North Carolina Department of Environment and Natural Resources (NC DENR); and the United States Department of the Navy (DON) entered into a Federal Facilities Agreement (FFA) for MCB, Camp Lejeune on March 1, 1991 (effective date). The objectives of the FFA are:

- To ensure that the environmental impacts with past and present activities at MCB, Camp Lejeune are thoroughly investigated and appropriate CERCLA response actions are developed and implemented as necessary to protect the public health, welfare and the environment;
- To establish a procedural framework and schedule for developing, implementing and monitoring appropriate response actions at MCB, Camp Lejeune in accordance with CERCLA, the NCP, and USEPA policy relevant to remediation at MCB, Camp Lejeune; and
- To facilitate cooperation, exchange of information and participation of the Parties in such action.

The Fiscal Year 2001 Site Management Plan for MCB, Camp Lejeune, the primary document referenced in the FFA, accounts for each of the sites at the Base and provides detailed strategic planning. Many of the sites listed in the FFA have been investigated through the completion of Remedial Investigation/Feasibility Studies (RI/FS). However, several sites (Site 12 included) did not warrant a full scale RI/FS. As such, these sites were investigated by completing Pre-Remedial Investigation (Pre-RI) Screening Studies. The goal of these investigations was to determine if a full RI study was necessary or if a decision of no action was appropriate.

This No Action (NA) Decision Document (DD) supports no action for Site 12. The purpose of this NA DD is to summarize the existing data for the site and to describe the Marine Corps' rationale for no action. The site was not evaluated for Unexploded Ordnance (UXO) or metals. Because Site 12 is an active range, it is in the Camp Lejeune Range Evaluation Program. Metals and UXO will be addressed through this program.

Decision documents of this type can fall into four categories. The category into which a site is placed is determined by the investigation(s) that have been conducted at the site. They are divided as follows: Category I - NA decision is based on the results of a Preliminary Assessment (PA), a PA supplement, or an equivalent effort; Category II - NA decision is based on the results of a Site Inspection (SI), an SI supplement, or an equivalent effort; Category III - NA decision is based on the results of a Remedial Investigation (RI) and, if required, a Feasibility Study (FS), or an equivalent effort; Category IV - NA decision is based on the completion of a removal action or remedial action (RA) (including interim actions), or an equivalent effort.

Site 12 is a Category II designation. The Pre-RI Screening Study was completed to determine if further investigations were warranted; this effort is equivalent to a SI. The Pre-RI Screening Study completed at Site 12 provides sufficient information about the history, nature of the site and subsequently verifies the lack of contamination. Therefore, a Category II - NA DD is herein presented in accordance with all Category II requirements.

The objectives of this NA DD for Site 12 are:

- To briefly describe the location, history and environmental setting of Site 12 and its relationship to MCB, Camp Lejeune;
- To describe the current status of the site based on the results of the related investigations; and
- To assess the potential risks to human health at the site.

Data from the Pre-RI Screening Study (Baker, 1998) were used to derive and support no further action for Site 12. The Pre-RI Screening Study was initiated to detect and characterize potential impacts to human health, and to determine if the site required further investigative work. The investigation included soil sampling, permanent monitoring well installation, groundwater sampling, and a site survey.

1.1 Site Location and Description

To provide the reader with the entire framework of Site 12, the following subsections discuss site locations and descriptions for both MCB, Camp Lejeune and Site 12.

1.1.1 MCB, Camp Lejeune

MCB, Camp Lejeune is located on the coastal plain of North Carolina in Onslow County. The facility is bisected by the New River and encompasses approximately 236 square miles (of which approximately 40 square miles is water, made up by the New River and its tributaries). The New River flows in a southeasterly direction and forms a large estuary before entering the Atlantic Ocean. The southeastern border of MCB, Camp Lejeune is the Atlantic Ocean shoreline. The western and northeastern boundaries of the facility are U.S. Route 17 and State Route 24, respectively. The city of Jacksonville borders MCB, Camp Lejeune to the north.

Construction of MCB, Camp Lejeune began in April 1941 at the Hadnot Point Industrial Area, where major functions of the base are still centered today. The facility was designed to be the "World's Most Complete Amphibious Training Base." The MCB, Camp Lejeune complex consists of six geographical and operational locations under the jurisdiction of the Base Command. These areas include Camp Geiger, Montford Point (which includes Camp Johnson), Courthouse Bay, Mainside, the Rifle Range Area, and the Greater Sandy Run Area. Marine Corps Air Station (MCAS) New River is operationally under the control of MCAS Cherry Point. However, MCB, Camp Lejeune is responsible for the facilities and environmental management of MCAS New River.

1.1.2 Site 12

Site 12, the Explosive Ordnance Disposal (EOD) area, is located in the area referred to as Camp Lejeune Mainside in the eastern portion of the MCB, Camp Lejeune. This site is located approximately two miles northeast of Sneads Ferry Road and State Route 172, as shown on Figure 1-1. Access to Site 12 is provided from the west via an unimproved road (i.e., dirt road) that turns east from Sneads Ferry Road at Fire Tower M (Figure 1-2). An active tank trail runs along the northern edge of the site.

The Site 12 area comprises nearly two acres of the ten acre EOD detonation area and is surrounded by wooded areas as shown on Figure 1-2. The site terrain is flat with a sandy surface cover, and is sparsely vegetated with grasses and occasional small brush. There are no drainage ditches in the immediate vicinity of the site. Due to low lying areas within the site and bordering the site, standing water is present creating a marshy type environment. A pond is present south of Site 12.

1.2 Site History and Enforcement Activities

Site 12 is within an area where unserviceable or defective ordnance is disposed of through burning or detonation. These practices have been conducted at this area from the early 1960's to present day. An explosive crater (approximately eight feet deep) was created during a disposal exercise in 1992 which uncovered an oily sheen and petroleum odors were noted. There is no documented evidence that fuel storage tanks were ever present at the site, nor is there documentation that petroleum fuels were used in the explosive practices. Until the time of the Pre-RI Screening Study, no documentation existed to confirm if a release occurred in this area. During field activities at Site 12, it was learned that the disposal of small arms ammunition was carried out by piling up rounds, dousing the pile with diesel fuel and exploding the pile with a small charge/initiator. Additionally, it was learned that the range was used, for a short time, as a target range upon which aircraft would drop "dummy" bombs.

No previous investigations pre-dating the Pre-RI were conducted at this site to determine the presence or absence of contamination. The Pre-RI Screening Study included sampling of surface soil, subsurface soil, and groundwater, evaluating the resultant analytical data, and performing a qualitative and quantitative risk assessment for multiple sites. This study provided the information necessary to determine if the site had contributed hazardous substances to the environment. Specifically, only subsurface soil and groundwater samples were collected at Site 12.

The NCP states that sites identified by the USEPA as sites which warrant no additional evaluation are given a "No Further Response Action Plan (NFRAP)" designation within the CERCLA Information System (CERCLIS). Through this designation, no supplemental investigation or remediation work will be performed at the site unless new information on the site is presented indicating that the initial decision was not appropriate. This NA DD presents the pertinent information that supports the conclusion that Site 12 poses little or no potential threat to human health.

Site 12 is within the ten acre EOD active detonation area and is included in the Camp Lejeune Range Evaluation Program.

No CERCLA enforcement activities have occurred at Site 12.

1.2.1 Investigative Activities

The following subsections provide a summary of the results of the Pre-RI Screening Study.

1.2.1.1 Pre-RI Screening Study

The field work for a Pre-RI Screening Study was completed by Baker Environmental, Inc. (Baker) in October 1995 with the subsequent final report completed in November 1998. The field activities included soil and groundwater sampling.

A total of 30 subsurface soil samples were collected at Site 12 ranging in depth from ground surface to five feet below ground surface (bgs). The samples were analyzed on-site for VOCs using a mobile laboratory. In addition, four samples were sent to a fixed based laboratory for confirmation and analyzed for VOCs, oil and grease, and total petroleum hydrocarbons. There were no organic compounds detected in any of the soil samples collected from Site 12.

Thirty groundwater samples were collected from the same boring locations where the soil samples were collected. All samples were screened for volatile organic compounds (VOCs) using an on-site mobile laboratory. Results of the screening indicated that nine of the groundwater samples detected xylenes at the method detection limit of 2 micrograms per liter ($\mu\text{g/L}$), as shown in Table 1-1. In addition, four groundwater samples were taken from permanently installed monitoring wells which border Site 12 and analyzed for VOCs and SVOCs. Organic compounds were not detected in any of these groundwater samples.

The qualitative portion of the risk assessment did not identify any risk from the media sampled at the site. Because no contaminants of potential concern (COPCs) were identified in the qualitative risk assessment, the quantitative portion of the risk assessment was not conducted.

1.2.2 Regulatory Agency/Public Involvement

The USEPA and NC DENR have been actively involved with the investigation of this site through report review and partnering meetings. Based on these results, no further investigative activities are needed at Site 12.

Public involvement is discussed in the following section.

1.3 Community Participation

A public meeting was held at MCAS, New River on August 27, 1996 to discuss the results of the Pre-RI Screening Study. The meeting included members of the local Base community, and representatives from MCB, Camp Lejeune, Atlantic Division Naval Facilities Engineering Command (LANTDIV), and Baker. The members of the project team presented the findings of the investigation and discussed the results of the risk assessment. Members of the community were given the opportunity to ask questions and comment on the related information. These comments and questions were immediately and informally addressed at the public meeting.

This NA DD was made available to the public for comments at a public meeting held on April 19, 1998. However, there was no formal comment period. No comments were received from the public on the draft document. Comments were received from the USEPA, NC DENR, Camp Lejeune and the Navy Environmental Health Center. These comments were addressed within the content of this document.

2.0 SUMMARY OF SITE CHARACTERISTICS

This section summarizes information pertaining to MCB, Camp Lejeune existing background information. In addition, specific information relevant to Site 12 is presented.

2.1 Climatology

MCB, Camp Lejeune experiences hot and humid summers; however, ocean breezes frequently produce a cooling effect. The winter months tend to be mild, with occasional brief cold spells. Average daily temperatures range from 34° F to 54° F in January, the coldest month, and 72° F to 89° F in July, the hottest month. The average yearly rainfall is 52.4 inches.

2.2 Physiography, Geology and Soils

MCB, Camp Lejeune is located in the Atlantic Coastal Plain physiographic province. The sediments of this province consist primarily of sand, silt, and clay. Other sediments may be present, including shell beds and gravel. Sediments may be of marine or continental origin. United States Geological Survey (USGS) studies at MCB, Camp Lejeune indicate that the base is underlain by sand, silt, clay, calcareous clay and partially cemented limestone. The combined thickness of these sediments beneath the base is approximately 1,500 feet.

2.3 Hydrogeology

The aquifers of primary interest are the surficial aquifer and the underlying Castle Hayne aquifer. The surficial aquifer consists of interfingering beds of sand, clay, sandy clay, and silt that contain some peat and shells. The thickness of the surficial aquifer ranges from 0 to 73 feet bgs and averages nearly 25 feet bgs over MCB, Camp Lejeune. This aquifer is not used for water supply at MCB, Camp Lejeune. The Castle Hayne aquifer lies below the surficial aquifer and consists primarily of unconsolidated sand, shell fragments, and fossiliferous limestone. Between the surficial aquifer and Castle Hayne aquifer lies the Castle Hayne confining unit which consists of clay, silt, and sandy clay beds. The Castle Hayne aquifer is about 150 to 350 feet thick, increasing in thickness to the ocean. The top of the aquifer lies approximately 20 to 73 feet bgs. Onslow County and MCB, Camp Lejeune lie in an area where the Castle Hayne aquifer generally contains freshwater; therefore, the Castle Hayne aquifer is a viable potable water source for the region's population.

Field investigation activities at Site 12 established groundwater at approximately 4 feet bgs. Initial observations of groundwater collected from inside blast craters at the site revealed a dark brown color to the water with an "oily" looking sheen on its surface. Further examination of the water indicated that the color and "sheen" was not the result of petroleum products, but a naturally occurring condition. Causes of the sheen include non-petroleum hydrocarbons, sub micron dust, etc.

2.4 Surface Water

The dominant surface water feature at MCB, Camp Lejeune is the New River. At MCB, Camp Lejeune, the New River flows in a southerly direction into the Atlantic Ocean through the New River Inlet.

Aside from a pond located south of the site, there are no significant surface water bodies at Site 12. The nearest stream is Frenchs Creek which is located west of the site and flows in a westerly direction discharging into the New River.

2.5 Land Use

Land use within the Base is influenced by topography and ground cover, environmental policy, and base operational requirements. Much of the land within MCB, Camp Lejeune consists of freshwater swamps that are wooded and largely unsuitable for development. In addition, 3,000 acres of sensitive estuary and other areas were set aside for the protection of threatened and endangered species and are to remain undeveloped. Operational restrictions and regulations, such as explosive quantity safety distances, impact-weighted noise thresholds, and aircraft landing and clearance zones, may also greatly constrain and influence development (LANTDIV, 1998). The combined military and civilian population of MCB, Camp Lejeune and Jacksonville area is approximately 112,000. Nearly 90 percent of the surrounding population resides within urbanized areas. The presence of MCB, Camp Lejeune has been the single greatest factor contributing to the rapid population growth of Jacksonville and adjacent communities, particularly during the period from 1940 to 1960.

2.6 Receptors

Site 12 is located in a remote area of the Base used for explosive ordnance operations. Consequently, there are no residential areas in the proximity of the sites that must be considered. No COPCs were identified for Site 12. Therefore, no receptors were evaluated in the risk assessment for Site 12.

3.0 DATA ANALYSIS/RISK ASSESSMENT

Based on the qualitative portion of the risk assessment, there were no COPCs identified at Site 12 for the subsurface soil and the groundwater because no contaminants were detected in subsurface soil or groundwater samples (collected from permanent monitoring wells and the temporary boreholes). Only low levels of xylenes were detected in samples collected using Geoprobe® which were analyzed on site. The quantitative portion of this risk assessment was not necessary because no COPCs were identified. UXO and metals were not evaluated in the Pre-RI Screening Study. Site 12 is an active range and is included in the Camp Lejeune Range Evaluation Program. Metals and UXO will be addressed through this program.

4.0 DESCRIPTION OF THE NA ALTERNATIVE

The data suggests that the groundwater and soil are not sufficiently contaminated to pose a threat to human health or the environment; therefore, justification for no action alternative has been obtained. No action is warranted at Site 12 under current conditions.

5.0 RESPONSIVENESS SUMMARY

This NA DD was made available to the public for comments at a public meeting held on April 19, 1998. However, there was no formal comment period. No comments were received from the public on the draft document.

6.0 REFERENCES

Baker Environmental, Inc. 1998. Final Pre-Remedial Investigation Screening Study Sites 12, 68, 75, 76, 85, and 87. Marine Corps Base, Camp Lejeune, North Carolina.

LANTDIV. Naval Facilities Engineering Command, Atlantic Division. January 1988. Camp Lejeune Complex Master Plan and Capital Improvements Plan Update. Prepared for the Commanding General, Marine Corps Base, Camp Lejeune, North Carolina.

TABLES

TABLE 1-1

SUMMARY OF GROUNDWATER DATA, SITE 12 PRE-REMEDIAL INVESTIGATION SCREENING STUDY
 VOLATILE ORGANIC COMPOUND RESULTS FROM ON-SITE LAB ANALYSIS
 SITE 12 EXPLOSIVE ORDNANCE DISPOSAL RANGE
 MCB, CAMP LEJEUNE, NORTH CAROLINA
 NA DECISION DOCUMENT, CTO 0120

Sample ID	Benzene (µg/L)	Toluene (µg/L)	Chlorobenzene (µg/L)	Ethylbenzene (µg/L)	Xylenes (µg/L)	1,3-Dichlorobenzene (µg/L)	1,2-Dichlorobenze (µg/L)	1,4-Dichlorobenzene (µg/L)
12-GP08	<2	<2	<2	<2	2	<2	<2	<2
12-GP09	<2	<2	<2	<2	2	<2	<2	<2
12-GP10	<2	<2	<2	<2	2	<2	<2	<2
12-GP14	<2	<2	<2	<2	2	<2	<2	<2
12-GP15	<2	<2	<2	<2	2	<2	<2	<2
12-GP16	<2	<2	<2	<2	2	<2	<2	<2
12-GP20	<2	<2	<2	<2	2	<2	<2	<2
12-GP22	<2	<2	<2	<2	2	<2	<2	<2
12-GP30	<2	<2	<2	<2	2	<2	<2	<2

Notes:

- (1) VOC analysis by EPA Method 8020.
- (2) Method Detection Limit equals 2 µg/L.
- (3) Shaded values indicate positive detections.

No organics were detected in the four permanent monitoring wells, or in groundwater samples collected from the other 21 geoprobe sampling locations.

FIGURES

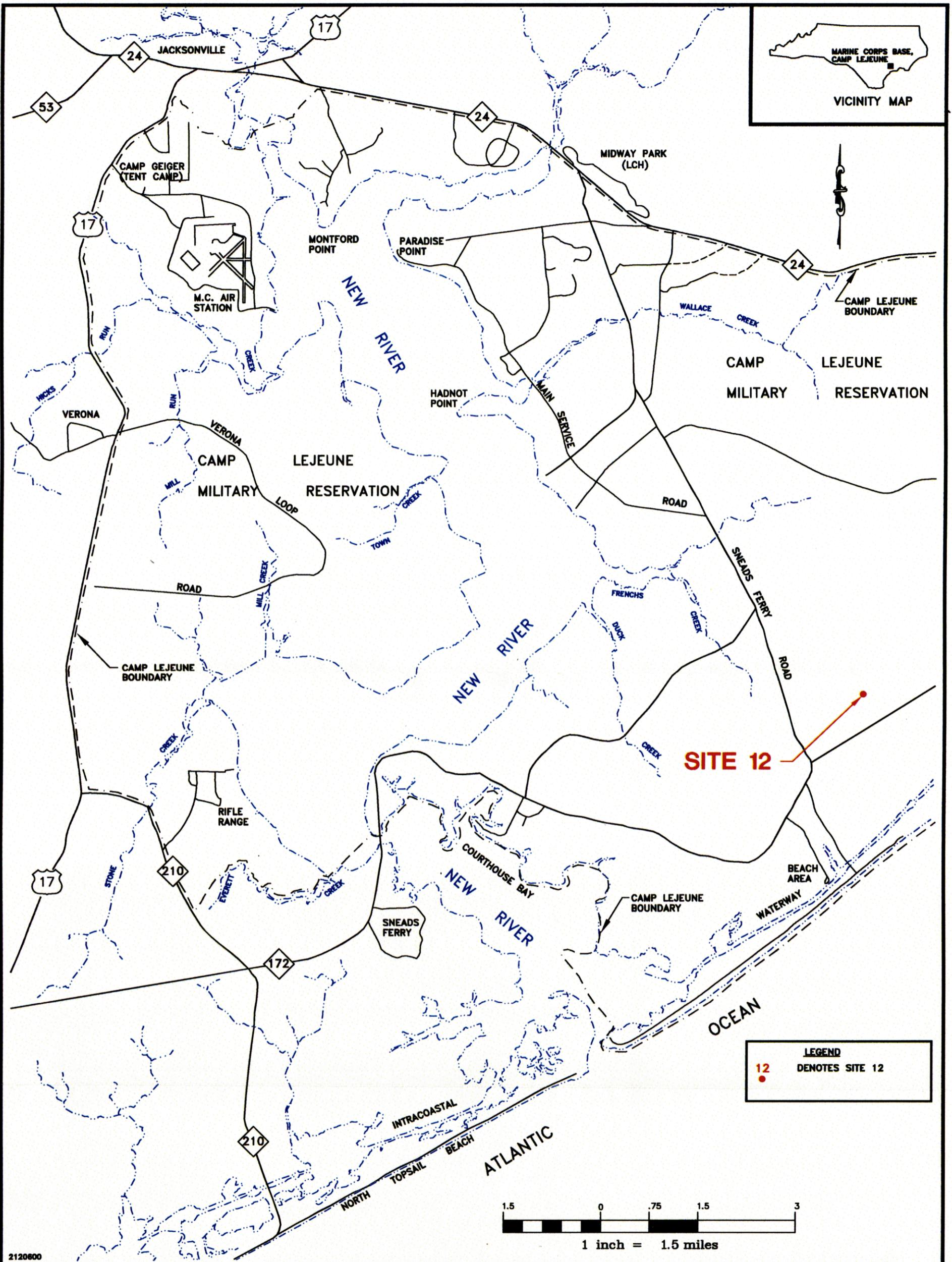


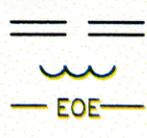
FIGURE 1-1
 LOCATION OF SITE 12
 EXPLOSIVE ORDNANCE DISPOSAL RANGE
 NA DECISION DOCUMENT
 CTO - 0120

MARINE CORPS BASE, CAMP LEJEUNE
 NORTH CAROLINA

LEGEND

12SB30 SOIL BORING

12-GW03 GROUNDWATER MONITORING WELL



GRAVEL OR DIRT ROAD
TREE LINE
EXISTING OVERHEAD ELECTRIC LINES

SOURCE: BRENT A. LANIER R.L.S., MARCH 1996.

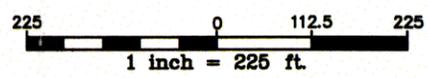


FIGURE 1-2
SITE 12 - SITE LOCATION MAP
EXPLOSIVE ORDNANCE DISPOSAL RANGE
NA DECISION DOCUMENT
CTO - 0120
MARINE CORPS BASE, CAMP LEJEUNE
NORTH CAROLINA

NOTE: UNDERGROUND WIRES, LINES, PIPES AND OTHER UTILITIES WERE NOT ATTEMPTED TO BE SURVEYED AT THIS TIME.

ATTACHMENT A
STATE OF NORTH CAROLINA APPROVAL LETTER

**NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT**



**MICHAEL F. EASLEY, GOVERNOR
WILLIAM G. ROSS, JR., SECRETARY
DEXTER R. MATTHEWS, INTERIM DIRECTOR**

July 30, 2001

Commanding General
(ATTN: AC/S EMD/IRD)
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

RE: No Further Action (NFA) Decision Document
Site 12
MCB Camp Lejeune

Dear Sir:

The Superfund Section has completed its review of this document. The Decision Document transfers the site to the Camp Lejeune Range Evaluation Program (CLREP) and requests a NFA designation for Site 12.

Site 12 is an active range. Based on a Pre-Remedial Investigation (RI) Screening Study and the transfer of the range to the CLREP, the Superfund Section concurs with the NFA designation. The Pre-RI Screening Study failed to reveal significant contamination; however, because the range is still active, metals and unexploded ordnance were not addressed at this time. These concerns will be addressed under the CLREP. No remediation will be required unless the Superfund Section later determines, based on new information or information not previously provided to the Section, that the site is contaminated above current standards or that the Section was provided with false or incomplete information.

We appreciate the opportunity to review this document. If you have any questions or comments, please contact me at (919) 733-2801, extension 278.

Sincerely,

David J. Lown, LG, PE
Geological Engineer
Superfund Section

ATTACHMENT B
USEPA REGION IV APPROVAL LETTER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

June 26, 2001

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commanding General
Attn.: AC/S, EMD/IRD
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

SUBJ: MCB Camp Lejeune
Site 12
No Action Decision Document

Dear Sir:

The U.S. Environmental Protection Agency (EPA) Region 4 has reviewed the above subject decision document and concurs with the selected No Action Remedy for Site 12. This remedy is supported by the previously completed Pre-Remedial Investigation Screening Study.

This remedial action is protective of human health and the environment, complies with Federal and State requirements that are legally applicable or relevant and appropriate to the remedial action and is cost effective.

If there are any questions or comments, I can be reached at (404) 562-8538.

Sincerely,


Gena D. Townsend
Senior Project Manager

cc: Thomas Burton, Camp Lejeune
Dave Lown, NCDENR
Kirk Stevens, LANTDIV