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Response to Comments
Draft Site Specific Work Plan Addendum for Preliminary Assessment/Site Inspection Site UXO-01 Former Live Hand Grenade Course MCB Camp Lejeune, North Carolina

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Introduction

The purpose of this document is to address comments to the Draft Site Specific Work Plan Addendum for Preliminary Assessment/Site Inspection Site UXO-01 Former Live Hand Grenade Course for Marine Corps Base (MCB) Camp Lejeune, North Carolina. The North Carolina Department of Environment and Natural Resources (NCDENR) and the United States Environmental Protection Agency (USEPA) provided the comments listed. Comments were solicited from Naval Facilities Engineering Command (NAVFAC) Mid-Atlantic Division; however they indicated they had no comments on the subject report. Responses to comments are provided in bold type.

North Carolina Department of Environment and Natural Resources Comments (dated January 11, 2008)

General Comment

This Phase II Work Plan along with the MRP Master Project Plans appears to be thorough and in good order and sufficient for the proposed work.

Specific Comments

1. Section 1.2, third bullet- Why approximately 10%? Who or what guidance directed this number? Please explain how this was determined in the text. In addition, please be consistent throughout the document. Section 5.7 says 13% will be cut. In addition, please explain how 3 decision units were determined and their location at the site.

Knowledge of the specific target zone or impact area is not known. Therefore, an approach is being taken to provide a broad overview of site conditions. The purpose of the DGM investigation is to support base construction activities. The intent of performing DGM over 10% of the area is to determine a risk level to establish whether a

removal is merited and what level of UXO support is required for construction. In addition, 10% DGM coverage is an accepted munitions response industry standard.

Section 5.7 refers to the percentage of vegetation that will be cut to accommodate DGM activities.

Three decision units are planned based on site features. Multi-increment sampling is not conducive to heavily vegetated areas; therefore, three decision units of appropriate size are located in those areas of the site with minimal amounts of dense undergrowth.

2. Section 1.4, fourth paragraph- While disposal of munitions may not be suspected, it cannot be ruled out entirely. Small amounts may have been buried to avoid transporting back to depot.

No information was found indicating that munitions are suspected to be buried at the site. However, DGM is being conducted to assess if subsurface anomalies are present.

3. Section 3.2.2, second bullet- This is a bit confusing. I would put a bullet after the Phase 1 bullet and discuss the utility locating there since this should occur before the temporary monitoring well installation or intrusive sampling.

The sentence referencing utility locating will be moved to the end of the paragraph summarizing Phase I activities in Section 3.2.2.

4. Section 3.2.3, third paragraph- I would suggest this paragraph should be the first in this section as it should be done first before clearing begins.

The section will be revised as requested.

5. Section 3.2.4, third bullet- Restoration of the site will be verified by whom?

Restoration of the site will be verified by a CH2M HILL Field Team Leader, if necessary.

Section 3.2.4 was modified to read:

"Restoration of the site to an appropriate level (e.g., repair deep ruts) will be verified by the CH2M HILL field team leader"

6. Figures 3-1, 3-2 and 3-3, How were these sampling points determined? Please discuss in this document in detail.

The site was last used as a hand grenade range in 1946. Soil and groundwater sample locations are distributed across the site (as conditions permit) due to a lack of available historical information indicating specific areas within the site with a high potential for MEC and associated munitions constituents (MC) to be present. Subsurface soil and groundwater samples will be co-located. If geophysical anomalies indicative of potential subsurface MEC are identified during the DGM surveys, the subsurface soil and groundwater sampling locations may be altered to be within the vicinity of these signatures.

The following statement was added to Section 3.6.1 of the Work Plan:

"Soil and groundwater sample locations are distributed across the site (as conditions permit) due to a lack of available historical information indicating specific areas within the site with a high potential for MEC and associated munitions constituents (MC) to be present. If geophysical anomalies indicative of potential subsurface MEC are identified during the DGM surveys, the subsurface soil and groundwater sampling locations may be altered to be within the vicinity of these signatures."

USEPA General Comments (dated April 1, 2008)

Specific Comments

The document identifies two potable supply wells (HP703 & HP704) located within a 1,000 foot boundary of UX01. A summary of all analytical data concerning these wells should be included in the narrative portion of the report. This includes data from the MRP and Drinking Water Programs.

A summary of available and relevant analytical groundwater data from wells HP703 and HP704 will be included in the final PA/SI report.