

Response to Comments
Draft Site Specific Work Plan Addendum for Preliminary Assessment/Site
Inspection Site UXO-03 Former Practice 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-03 Former Practice Hand Grenade Course for Marine Corps Base (MCB) Camp Lejeune, North Carolina. The North Carolina Department of Environment and Natural Resources (NCDENR) provided the comments listed. Comments were solicited from the United States Environmental Protection Agency (USEPA) and the 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 28, 2008)**

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 explain how 2 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.

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

2. Section 2.2.6, third paragraph- please explain why the NC SSLs and NC 2L standards are not used in the Human Risk Screening.

Section 2.2.6 of the Work Plan has been modified to add the NC SSLs and the NC 2L standards to the screening criteria for soil and groundwater respectively.

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 2.2.6.

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.

Section 3.2.3 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 the CH2M HILL Field Team Leader.

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 landscape has been significantly altered by development activities since operation of the former range. 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.”

7. Section 3.6.1- Please list Method 8330B here for soil and sediment as a possible method.

Soil and sediment samples will be analyzed by Method 8330 and will not be analyzed by Method 8330B. References to Method 8330B will be removed from the Work Plan. Currently, there are no laboratories Navy certified for analyzing explosives residues using Method 8330B. The Navy has expressed concerns over some of the sample preparation requirements in this method and is currently evaluating the appropriateness of this method for future investigations.