

Response to Comments  
Draft Focused Site Inspection Work Plan Addendum  
Site UXO-06, Base Borrow Pit Expansion  
MCB Camp Lejeune, North Carolina

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PREPARED FOR: Bob Lowder, MCB Camp Lejeune  
Bryan Beck, NAVFAC Mid-Atlantic  
Gena Townsend, EPA Region 4  
Randy McElveen, NCDENR  
Marti Morgan, NCDENR

PREPARED BY: CH2M HILL

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### Introduction

The purpose of this document is to address comments on the Draft Focused Site Inspection Work Plan Addendum for the Military Munitions Response Program (MMRP) Site Unexploded Ordnance (UXO)-06. The North Carolina Department of Environment and Natural Resources (NCDENR) Superfund Section and the United States Environmental Protection Agency (USEPA) provided the comments listed below. Responses to comments are provided in bold.

### NCDENR Comments (dated July 20, 2009)

#### *Specific Comments*

1. The Project Schedule, Figure 2-2, should be updated. The Geophysical Investigation is scheduled to begin before the Regulatory review is completed.

**The schedule in the draft Work Plan Addendum assumed Regulator approval would be granted to start initial field activities based on a conference call prior to the regulatory review period being completed. All comments on the draft Work Plan Addendum have been received; therefore, the schedule will be revised to reflect what is most current.**

2. This Work Plan does not clearly explain how this work is different from the Site UXO-06 PA/SI Investigation work. Please clarify where previous PA/SI work at Site UXO-06 was completed and any overlap with this Borrow Pit Expansion Area investigation work. This discussion should be included in Section 1 and should reference a Figure that shows the two investigation areas together and how they overlap. This will help minimize confusion regarding these two investigations.

**Section 1.5 of the draft Work Plan Addendum summarizes the previous investigations completed at UXO-06. At the beginning of this section, it discusses which investigations were conducted outside of the Borrow Pit Expansion Area (BPEA). The Site UXO-06 Preliminary Assessment/Site Inspection (PA/SI) was the only previous investigation that was conducted within BPEA. The discussion in Section 1.5 for this**

**investigation specifies what the investigation results were for the activities conducted within the BPEA. In addition, Figure 1-2 show the previous environmental samples collected within the BPEA and Figure 1-3 shows MEC intrusive investigation results within the BPEA.**

3. Next to the last paragraph on page 3-5 discusses MEC, MPPEH and MD of expended munitions. Please provide an explanation in the text of this page clarifying why samples will not be taken where munitions debris (MD) or expended munitions are identified.

**Expended munitions are categorized as MPPEH and were erroneously included in the following statement that will be deleted from the Work Plan Addendum:**

**“Samples will not be collected from locations where MD or expended munitions are identified.”**

**The following text will be added to the Work Plan Addendum:**

**“Samples will be collected from areas of expended munitions if it is suspected that MC may have been released. It is not expected that there would be any MC where MD is located.”**

USEPA Comments (dated July 16, 2009)

No comments. Document can be finalized.