

Response to Comments
Draft Preliminary Assessment/Site Inspection Work Plan MMRP Site UXO-07, D-6
Practice Hand Grenade Course
MCB Camp Lejeune, North Carolina

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The purpose of this document is to address comments to the Draft Preliminary Assessment/Site Inspection Work Plan for UXO-07 Former D-6 Practice Hand Grenade Course, Marine Corps Base (MCB) Camp Lejeune, North Carolina. The North Carolina Department of Environment and Natural Resources (NCDENR) provided comments below. Responses to comments are provided in bold type. The United States Environmental Protection Agency (USEPA) Region 4 did not have any comments.

North Carolina Department of Environment and Natural Resources
(dated March 26, 2009)
Specific Comments

1. On page 3-4, it states that "HTW contamination, except metals, should not be characterized using the TR-02-01 sampling approach; therefore, eight discrete surface soil samples (MR07-SS35 through MR07-SS42) will be collected from 0 to 6 inches bgs to evaluate the presence and nature of HTW (except metals) contamination in surface soil in the southern area of Site UXO-07 in the vicinity of the Former 5th Area Gun Park (Figure 3-1)". The Archival Records Search Report in Appendix A, Figure 2-4, depicts the 5th Area Gun Park to be slightly southwest of the understood location of the practice hand grenade range (the location of the softball and baseball fields). It might be beneficial to include labeling on Figure 1-1 for the two areas of UXO-07 that are being investigated and to state the former land uses for each: From the Archival Records Search Report it seems that the 2-acre area being investigated (the southern area) encompasses the former practice hand grenade range and the 5th Area Gun Park; the 5- acre area encompasses the Division Shop Area where vehicle maintenance activities were conducted.

As discussed at the April 2009 partnering meeting, PA/SI activities at Site UXO-07 will be limited to potential constituents associated with former range activities. Therefore, samples will only be collected to evaluate potential MC-related contamination and the work plan has been revised to reflect this change.

2. On page 3-5 it lists the analytical methods which will be run on soil samples. Among the methods are TPH-DRO and -GRO. What screening levels are these results compared to?

Soil samples will not be analyzed for TPH-DRO and -GRO and the analyses have been deleted from the work plan.

3. Also on page 3-5 it describes the subsurface soil samples that will be collected from a 2 ft interval just above the water table. It states that all of these soil samples will be analyzed for:
- Explosives residues (SW-846 USEPA Method 8330)
 - PETN (SW-846 USEPA Method 8330)
 - Nitroglycerine (SW-846 USEPA Method 8330)
 - Perchlorate (USEPA Method 6850)
 - Total metals (ILM05)

and that samples within the southern area of Site UXO-07 (MR07-IS13 through MR07-IS17) will also be analyzed for the following parameters (refer to Tables 3-1 through 3-3):

- TCL VOCs (OLM04)
- TCL SVOCs (OLM04)
- TPH -GRO (SW-846 USEPA Method 8015)
- TPH -DRO (SW-846 USEPA Method 8015)

Table 3-1 indicates, however, that all of the direct push samples will be analyzed for the VOCs, SVOCs, and TPH-DRO and -GRO. This would be NCDENR's preference as well.

PA/SI activities at Site UXO-07 will be limited to potential constituents associated with former range activities. The following subsurface soil parameters have been deleted from Tables 3-1 through 3-3 and the text of the work plan.

- TCL VOCs (OLM04)
- TCL SVOCs (OLM04)
- TPH -GRO (SW-846 USEPA Method 8015)
- TPH -DRO (SW-846 USEPA Method 8015)

4. On page 3-6, it describes the ground water samples that will be collected. It states:

Samples will be analyzed by a fixed base laboratory for the following parameters (refer to Tables 3-1 through 3-3):

- Explosives residues (SW-846 USEPA Method 8330)
- PETN (SW-846 USEPA Method 8330)
- Nitroglycerine (SW-846 USEPA Method 8330)
- Perchlorate (USEPA Method 6850)
- Total and dissolved metals (ILM05)

and that samples within the southern area of Site UXO-07 (MR07-TW13 and MR07-TW17) will also be analyzed by a fixed base laboratory for the following parameters (refer to Tables 3-1 through 3-3):

- TCL VOCs (OLM04)
- TCL SVOCs (OLM04)
- TPH -GRO (SW-846 USEPA Method 8015)

- TPH -DRO (SW-846 USEPA Method 8015)

Table 3-1 indicates, however, that all of the ground water samples will be analyzed for the VOCs, SVOCs, and TPH-DRO and -GRO. This would be NCDENR's preference as well.

As discussed at the April 2009 partnering meeting, PA/SI activities at Site UXO-07 will be limited to potential constituents associated with former range activities. The following ground water parameters have been deleted from Tables 3-1 through 3-3 of the work plan.

- TCL VOCs (OLM04)
- TCL SVOCs (OLM04)
- TPH -GRO (SW-846 USEPA Method 8015)
- TPH -DRO (SW-846 USEPA Method 8015)