Response to Comments
Draft Report – Preliminary Assessment/Site Inspection, Former 1,000-inch Range (Amphibious Base Area)—UXO-15
Marine Corps Base Camp Lejeune, North Carolina

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Introduction

The purpose of this document is to address comments on the Draft Report for the Preliminary Assessment/Site Inspection, Former 1,000-inch Range (Amphibious Base Area)—UXO-15, Marine Corps Base Camp Lejeune, North Carolina. The North Carolina Department of Environment and Natural Resources (NCDENR) and United States Environmental Protection Agency have provided the comments listed below. The responses to comments are provided in bold.

North Carolina Department of Environment and Natural Resources Comments (dated November 3, 2009)

1. General Comment

The State concurs with the Conclusions and Recommendations of the Draft Preliminary Investigation/Site Inspection Report for Site UXO-15 1,000-inch Range.

2. Specific Comment

The NC HWS Soil Screening Levels for protection of groundwater have been superseded by the attached Federal Remediation Branch (FRB) Target Screening Values. These new FRB Target Screening Values are based on the chemical specific data from the updated EPA RSL Tables. EPA Region IV sent notification on June 13, 2008 that the new EPA RSL Tables replaced the Region IX PRG Tables. However, the FRB Target Screening Values Tables were completed in October 2009. Therefore, these new FRB Target Screening Values have just now become available for application to site screening. Please replace the former NC HWS SSLs, used in the UXO-15 PA/SI Report, with the attached updated FRB Target Screening Values. For all future work at NC Superfund Sites the attached FRB Tables should be used when determining soil screening values for risk screening.

The only major change to the screening level risk assessment is the change in the arsenic screening value from 30 to 5.44 mg/kg. However, since none of the sixty-four surface soil samples and only one of fifty-three subsurface soil samples exceeded this new 5.44 mg/kg screening value it should be considered an anomaly (or a high background point) since it does not represent the site concentration. I calculated the average of the subsurface soil concentrations at 1.26 mg/kg which is below the 5.44 mg/kg screening value. As we all know risk is based on exposure to an area not a point. This can be discussed in the uncertainty section of the screening level risk section of the report.

The text and tables have been updated with the January 2010 NCDENR Federal Remediation Branch Protection of Groundwater Preliminary Soil Remediation Goals (PSRGs).

United Stated Environmental Protection Agency Comments (dated February 9, 2010)

No Comment