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U S NAVY RESPONSE TO AGENCY COMMENTS ON THE DRAFT PRELIMINARY
ASSESSMENT/SITE INSPECTION REPORT MMRP SITE UXO-10 FORMER D-11A FLAME
TANK AND FLAME THROWER RANGE MCB CAMP LEJEUNE NC
06/22/2011
CH2M HILL

Response to Comments
Draft Preliminary Assessment/Site Inspection Report
MMRP Site UXO-10 Former D-11A Flame Tank and Flame Thrower Range (ASR
#2.136) Marine Corps Base Camp Lejeune, North Carolina

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The purpose of this document is to address comments to the Draft Preliminary Assessment/Site Inspection Report for UXO-10 Former D-11A Flame Tank and Flame Thrower Range, Marine Corps Base Camp Lejeune (MCB CamLej), North Carolina. The North Carolina Department of Environment and Natural Resources (NCDENR) and the United States Environmental Protection Agency (USEPA) provided the comments listed below. Responses to comments are provided in bold type.

North Carolina Department of Environment and Natural Resources
(Dated March 23, 2011)
Specific Comments

1. The UXO-10 PA/SI Report appears to be in good order and the NC Superfund Sections concurs with the conclusions and recommendations of the Report if all risk details are correct. David Lilley with the Division of Waste Management is in the process of reviewing the Risk Sections of the Report. His comments will be forwarded when they are completed. Based on my review of the Report, it appears there is no human health or ecological risk to any present or future receptors from chemicals or inorganics in soil or groundwater. Therefore, the intrusive anomaly investigation should be completed as recommended to assure that there are no unexploded ordnance threats to base personnel.

Comment noted, an intrusive anomaly investigation is planned as part of the upcoming Expanded SI.

North Carolina Department of Environment and Natural Resources
(Dated April 26, 2011)
Risk Assessment Comments

2. Appendix A: Please provide sample results for all chemicals, not just the ones detected.

Sample results for all chemicals analyzed have been provided.

3. Appendix H: The screening toxicity values in this report should be updated to reflect the November 2010 values.

The screening toxicity values in Appendix H have been updated.

4. Appendix H: The results from the duplicate samples should be reflected in the risk assessment sheets.

The results from the duplicate samples have been included in the risk assessment sheets.

5. Arsenic and cobalt were eliminated from the second step of the risk assessment (Table 2.2a and Section 5.3.2) in groundwater. Arsenic because of low detection frequency, and cobalt because screening value based on a PPRTV. The highest concentrations of both were found in same well (MR10-TW07-09D). According to Table 3-2, the water seems to be relatively low in turbidity. The calculated risk values for that well suggest this water should not be used.

Arsenic and cobalt are not likely site-related as they were not elevated and did not present unacceptable risk in soil. Additionally, only the duplicate sample from TW07 indicated an arsenic concentration (10.6 µg/L) that was just above the NC2L (10 µg/L), the original samples was below 10 µg/L, and an NC2L has not been developed for cobalt. An intrusive investigation to assess the nature of the geophysical anomalies is planned for UXO-10 as part of the upcoming Expanded SI. The need for additional sampling and risk assessment will be re-evaluated based on the results of the intrusive anomaly investigation.

United States Environmental Protection Agency

(Dated May 16, 2011)

Specific Comments

The Environmental Protection Agency (EPA) has completed its review of the above subject document, dated January, 2011. EPA agrees with the recommendations as stated. The recommendations are: no further sampling required to assess risk to human health and the environment, perform an intrusive investigation and re-evaluate the need for additional sampling after completion of the intrusive investigation. EPA recommends that the reevaluation also include a reassessment of the human health and ecological risk based on the results of the intrusive investigation.

Comment noted.