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MCB CAMP LEJEUNE
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LETTER AND COMMENTS FROM NORTH CAROLINA DEPARTMENT OF ENVIRONMENT
AND NATURAL RESOURCES ON THE DRAFT EXPANDED SITE INVESTIGATION REPORT
MILITARY MUNITIONS RESPONSE PROGRAM SITE UXO-26 FORMER B3 GAS CHAMBER
MCB CAMP LEJEUNE NC
9/6/2012
NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

September 6, 2012

NAVFAC Atlantic
Attn: Bryan Beck NAVFAC Mid-Atlantic Marine Corps
6506 Hampton Blvd
Norfolk, VA 23508

RE: Draft Expanded Site Investigation Report,
MMRP Site UXO-26, Former B-3 Gas Chamber
Marine Corps Base Camp Lejeune
Jacksonville, North Carolina

Dear Mr. Beck:

The Superfund Section of the Division of Waste Management has completed its review of the Draft Expanded Site Investigation Report for MMRP Site UXO-26, Former B-3 Gas Chamber. Comments from that review are attached.

If you have any questions, please contact me at (919) 707-8342.

Sincerely,

Marti Morgan
Environmental Engineer
NCDENR Superfund Section

Cc: Charity Rychak, MCB Camp Lejeune
Gena Townsend, US EPA
Randy McElveen

Draft Expanded Site Investigation Report,
MMRP Site UXO-26, Former B-3 Gas Chamber
Marine Corps Base Camp Lejeune

NCDENR Superfund Section Comments

Site Investigation Summary:

Section 2.7.4 states that “A total of 3,872 linear meters of DGM data was collected in February 2008 along 3-foot-wide transects distributed across the site and covering approximately 12 percent of UXO-26. The southeastern portion of 2.79b, and the northern portion of 2.79c were not accessible due to the presence of standing water and DGM was not performed in those areas. A total of 353 anomalies with a signal greater than 2.5 millivolts (mV) was observed from the DGM data, with no apparent pattern to the distribution of the anomalies.” In Section 4.1 it states that “During the intrusive investigation, no MEC, MPPEH, or ordnance-related debris were found in the 2.79a or 2.79c areas. In the 2.79b area, 24 M6A3 2.36-inch rockets were found and determined to be MEC. In addition, the sources of 56 geophysical anomalies in the 2.79b area were identified as rockets, rocket motors, or pieces of rockets (15 M6A3 2.36-inch rockets, 38 M6 2.36-inch rocket motors, and three rocket pieces) and were determined to be MPPEH.” In addition to this removal action, an investigation of all potential surface and subsurface MEC within a proposed military construction (MILCON) utility corridor and equipment staging area was performed in January and February 2012. The proposed utility corridor follows an existing gravel road that transects the site and the equipment staging area is a rectangular area south of the gravel road. This area is co-located within the footprint of Area 2.79b. The project scope of work included 100 percent DGM followed by intrusive investigation. During the MILCON utility corridor and staging area intrusive investigation, nine items of material potentially presenting an explosive hazard (MPPEH) (M6A3 2.36-inch anti-tank high-explosive rockets) were found and one was subsequently identified as MEC. Demolition of the MEC items was conducted at one common controlled detonation location within the ASR #2.79b area.

The recommendations provided in Section 7.2 state that “Because of the numerous MEC and MPPEH items found during the intrusive investigation of ASR #2.79b, additional DGM and intrusive investigations are recommended to define the extent of MEC/MPPEH to the south and east. It is recommended that the ASR #2.79b area be expanded approximately 500 ft to the south in order to capture the potential overshoot from the first target and any additional targets. The 2.36-inch rocket ranges potentially had targets at 100, 200, and 300 yards, and it is estimated that the additional 500 feet would capture these potential targets and any overshoot. Since it cannot be confirmed that the eastern border of the MRS has been defined, it is further recommended that the ASR #2.79b area be expanded approximately 150 feet to the east, except where bounded by Seventh Street (see **Figure 7-1**). The spatial extent of investigation in the expanded ASR #2.79b area would be contingent upon site conditions encountered in the field, such as standing water; therefore, any additional field investigations should be scheduled during months selected to maximize the accessible investigation area, most likely in the late summer or early fall. Since a 100 percent geophysical survey and MEC/MPPEH

clearance to a depth of 4 feet bgs were completed throughout the MILCON project area, no further investigation is necessary in that portion of UXO-26 ASR #2.79b; however, if MILCON is planned in the remaining ASR #2.7b area, 100% clearance of potential subsurface MEC is recommended. No additional MR investigation of UXO-26 areas ASR #2.79a and ASR #2.79c is recommended since the intrusive investigation found no MEC, MPPEH, or ordnance-related debris in those areas. No further investigation of environmental contamination in any portion of Site UXO-26 is recommended. However, this decision should be re-evaluated based on the results of further investigations for MEC/MPPEH.”

NCDENR Comments:

1. NCDENR concurs with the recommendations to expand the investigation to the south and east of Area 2.79b, expanding approximately 500 ft. to the south and 150 feet to the east except where bounded by Seventh Street.
2. Figure 4-1 shows the locations of the MEC and MPPEH found during the intrusive investigation. As seen from that figure, it looks important to include, in the next phase of investigation, the southeastern portion of Area 2.79b which was not accessible due to the presence of standing water during the previous investigation. As such NCDENR concurs with the recommendation to conduct the next phase of investigation at a time when this area of the site is dry.
3. Because so much MEC/MPPEH was found during this investigation in Area 2.79b, as a result of 12% DGM of the site, it seems there is reason to further investigate this area to provide 100% coverage as funding is available rather than waiting for a MILCON project to precipitate that.
4. NCDENR concurs that no additional MR investigation of UXO-26 areas 2.79a and 2.79c are warranted based on this investigation.
5. NCDENR concurs that no additional investigation of environmental contamination is necessary unless warranted as a result of future MEC/MPPEH discoveries and possible environmental issues associated with those.