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MCB CAMP LEJEUNE
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RESPONSE TO NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL
RESOURCES COMMENTS ON DRAFT PRELIMINARY ASSESSMENT SITE INSPECTION
REPORT FOR UNEXPLODED ORDNANCE SITE UXO 22 FORMER MUNITIONS DISPOSAL
AREA MCB CAMP LEJEUNE NC
4/8/2013
CH2MHILL

Response to Comments
Draft PA/SI Report
Site UXO-22 – Former Munitions Disposal Area
Marine Corps Installations East – Marine Corps Base Camp Lejeune, North
Carolina

PREPARED FOR: Dave Cleland, NAVFAC Mid-Atlantic
Charity Rychak, MCIEAST-MCB CAMLEJ
Patti Vanture, MCIEAST-MCB CAMLEJ
Gena Townsend, EPA Region 4
Randy McElveen, NCDENR

PREPARED BY: CH2M HILL

DATE: April 8, 2013

Introduction

The purpose of this document is to address comments on the Draft Preliminary Assessment/ Site Inspection (PA/SI) Report for Site UXO-22 – Former Munitions Disposal Area located at Marine Corps Installations East-Marine Corps Base Camp Lejeune (MCIEAST-MCB CAMLEJ). The North Carolina Department of Environment and Natural Resources (NCDENR) Superfund Section and the United States Environmental Protection Agency provided the comments listed below. The responses to comments are provided in bold.

NCDENR Human Health Risk Assessment Comments (dated March 12, 2013)

Specific Comment

1. Appendix E: There are two tables labeled 2.3, Surface Soil in the Ephemeral Drainage and Subsurface Soil with air as the medium. Please correct.

The tables were incorrectly placed in Appendix E and will be corrected in the final report. There should be an Appendix E.1 which includes the tables associated with the risk screening (the first step in the risk evaluation) and Appendix E.2, the full baseline HHRA for the media carried forward from the screening level risk assessment (in this case all media).

2. Appendix E, Table 2.2: It is unclear why the VOC, SVOC, and pesticide sample results contained in Appendix D, Table 5.2 for samples IR06-TP01-N-4-5-11A, IR06-TP01-S-4-5-11A, IR06-TP06-N-2-3-11A, IR06-TP08-N-3-4-11A, IR06-TP09-N-2-3-11A, IR06-TP10-N-4-5-11A, and IR06-TP12-N-2-3-11A were not included in this table. Please explain.

The samples listed above are test pit samples. These samples were collected to evaluate potential impacts associated with both Installation Restoration (IR) Site 6 and UXO-22. As UXO-22 is a Munitions Response (MR) site, explosives, and metals are the potential munitions-related constituents, and therefore, these data

were used for the UXO-22 PA/SI. The VOCs, SVOCs, pesticides, and metals data are associated with potential impacts associated with waste disposal for IR Site 6 and are presented as part of IR Site 6 reports.

3. Appendix E: Table 2.1a should be a refinement of Table 2.1, which deals with surface soil. Please correct.

Please see response to Comment 1.

4. Appendix E: The copper and iron concentrations on Tables 7.10RME and 7.11RME do not match those on Table 3.1RME. Please correct.

Tables 7.10.RME and 7.11.RME have been corrected and did not result in any required changes to the conclusions and recommendations.

NCDENR Ecological Risk Assessment Comments (dated March 12, 2013)

1. No comments

NCDENR Superfund Section Comments (dated March 4, 2013)

1. The NC Superfund Section concurs with the recommendation to further evaluate metals impacts to the ephemeral drainage swale. As shown on Figure 4-3, it appears that the batteries dumped in the area of MR22-SD02 are impacting down-gradient sediment and surface soils and as stated in the recommendations section, may be impacting the wetlands down-gradient of the ephemeral drainage swale. Some of the metals detected are associated with battery production. We need to further delineate the impact of the batteries to this drainage with several additional sediment and surface soil samples along the full length of this drainage swale to include samples in the associated wetland and Wallace Creek.

Since the boundaries of UXO-22 and IR Site 6 and 82 overlap in this area, completing the ephemeral drainage delineation as part of the supplemental Investigation of Sites 6 and 82 would be appropriate.

Concurrence and comments noted.

EPA Comments (dated March 19, 2013)

1. EPA agrees with the recommendation for further characterization of the nature and extent of munitions and explosives of concern and the further evaluation of the ephemeral drainage.

EPA does not agree with the “no further action” determination for metals. However, the metal contamination should be further evaluated not within the UXO-22 investigation, but, as part of Operable Unit 2 (OU2). It is more than likely that the metal contamination can be attributed to the historical disposal and storage practices undertaken in the OU2 area. The data suggests a potential risk which would require further evaluations before a final determination can be made.

Comments noted. Investigation of metals is being planned as part of ongoing investigation activities at OU2 (Sites 6 and 82).