

M67001.AR.005809
MCB CAMP LEJEUNE
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EMAIL REGARDING NO FURTHER COMMENTS FROM U S EPA REGION IV ON DRAFT
REDLINED FEASIBILITY STUDY REPORT FOR SITE 86 OPERABLE UNIT 20 (OU 20) MCB
CAMP LEJEUNE NC
9/17/2013
U S EPA REGION IV

Howell, Kevin/CLT

From: Townsend, Gena <Townsend.Gena@epa.gov>
Sent: Tuesday, September 17, 2013 3:29 PM
To: Henderson, Kimberly/VBO; beth.hartzell@ncdenr.gov; david.t.cleland@navy.mil; charity.rychak@usmc.mil; patricia.vanture@usmc.mil
Cc: Louth, Matt/VBO; Howell, Kevin/CLT; Fulkerson, Monica/CLT
Subject: RE: Draft Redlined Site 86 FS RTCs

EPA has no additional comments. The document can be finalized.

Gena D. Townsend
US EPA
61 Forsyth Street, SW
Atlanta, Georgia 30303
Tel. No: (404) 562-8538
Townsend.Gena@epa.gov

From: Kimberly.Henderson@CH2M.com [mailto:Kimberly.Henderson@CH2M.com]
Sent: Tuesday, September 10, 2013 2:29 PM
To: Townsend, Gena; beth.hartzell@ncdenr.gov; david.t.cleland@navy.mil; charity.rychak@usmc.mil; patricia.vanture@usmc.mil
Cc: Matt.Louth@CH2M.com; Kevin.Howell@CH2M.com; Monica.Fulkerson@CH2M.com
Subject: Draft Redlined Site 86 FS RTCs

Hi Team,
The responses to comments on the Draft Redlined Site 86 FS and updated action-specific ARARs tables are attached for your review. Please feel free to contact us with any questions.

Thanks!

Kim Henderson
CH2M HILL
5701 Cleveland Street, Suite 200
Virginia Beach, VA 23462
Direct - 757-671-6231
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www.ch2mhill.com

Howell, Kevin/CLT

From: Hartzell, Beth <beth.hartzell@ncdenr.gov>
Sent: Thursday, September 12, 2013 8:55 AM
To: Henderson, Kimberly/VBO; townsend.gena@epa.gov; david.t.cleland@navy.mil; charity.rychak@usmc.mil; patricia.vanture@usmc.mil
Cc: Louth, Matt/VBO; Howell, Kevin/CLT; Fulkerson, Monica/CLT
Subject: RE: Draft Redlined Site 86 FS RTCs

Looks good to me.
Beth

Elizabeth A. Hartzell
State Environmental Project Manager
Superfund Section, Federal Remediation Branch
NCDENR
(919) 707-8335

1646 Mail Service Center
Raleigh, NC 27699-1646

E-mail correspondence to and from this address may be subject to the North Carolina Public Records Law and may be disclosed to third parties.

From: Kimberly.Henderson@CH2M.com [mailto:Kimberly.Henderson@CH2M.com]
Sent: Tuesday, September 10, 2013 2:29 PM
To: townsend.gena@epa.gov; Hartzell, Beth; david.t.cleland@navy.mil; charity.rychak@usmc.mil; patricia.vanture@usmc.mil
Cc: Matt.Louth@CH2M.com; Kevin.Howell@CH2M.com; Monica.Fulkerson@CH2M.com
Subject: Draft Redlined Site 86 FS RTCs

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Thanks!

Kim Henderson

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**Response to Comments
Draft Redlined Feasibility Study
Operable Unit 20, Site 86
Marine Corps Installations East – Marine Corps Base Camp Lejeune
(MCIEAST-MCB CAMLEJ), North Carolina**

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

PREPARED BY: CH2M HILL

DATE: September 10, 2013

Introduction

The purpose of this document is to address additional comments on the responses to comments dated July 30, 2013 for the Draft Redlined Feasibility Study for Site 86, Operable Unit (OU) No. 20. The United States Environmental Protection Agency (USEPA) provided the additional comments listed below. The North Carolina Department of Environment and Natural Resources (NCDENR) had no additional comments on the Draft Redlined Feasibility Study. The responses to USEPA comments are provided in bolded text.

United States Environmental Protection Agency

Comments (dated July 30, 2013)

1. Table of Contents, page ii: See ARAR table corrections located on the following pages (examples from Site 35 - FS and Site 49 - ROD). Please include the highlighted ARARs into the original tables from the site 35 example and the entire tables from Site 49. The Site 49 tables should completely replace the appropriate sections.

The action-specific ARARs have been updated as suggested with the following exceptions:

- **The managing storm water runoff from land disturbing activities ARARs, 15A NCAC 4B citations were retained since they are the promulgated requirements.**
- **The disposal of solid waste and transportation of hazardous materials and samples citations were included; however, they were identified as offsite requirements. Identifying them as ARARs implies that offsite disposal is exempt from administrative requirements when it is not.**
- **The control of diffuse VOC emissions from groundwater treatment ARARs were retained for the active treatment alternatives.**

2. Table 5-2: This table in the initial draft document is confusing. There are seven different alternatives included in this table with a numbering system of 1 - 5. Are the alternatives "zone" specific? Please correct/clarify.

Table 5-2 will be updated to only include Alternatives 1 through 5.

3. Section 2.6.1.3 Groundwater Modeling and Remediation Timeframes:
Please add the following statement to the second sentence in the second paragraph:
"Thus, target treatment zones (TTZs) limited to concentrations > 100 times the NCGWQS was selected to focus on the core of each plume to maximize potential for mass reduction."

The text will be updated as suggested.

4. Section 5.2.2.4 Reduction of Toxicity, Mobility, or Volume through Treatment:
Remove the term treatment. This is misleading. This statement should be reworded, (for example): *"This alternative would not satisfy the statutory preference for treatment as a principal element. However, this alternative identifies the natural processes (natural attenuation), such as bio., adsor., etc. that reduces the toxicity, mobility or volume of the plume over time."*

The text will be updated as suggested.



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

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

August 1, 2013

Commander Atlantic Division
Naval Facilities Engineering Command
6506 Hampton Blvd.
Norfolk VA 23508-1278

Attention: David Cleland
Naval Facilities Engineering Command Atlantic
6506 Hampton Blvd.
NC/Caribbean IPT
Building C, 3rd Floor
Norfolk, Va. 23508-1278

RE: Draft Redline Feasibility Study OU20, Site 86
Camp Lejeune NC6170022580

Dear Mr. Cleland:

The NC Superfund Section has reviewed the Draft Redline Feasibility Study for OU20, Site 86 dated July, 2013. The Section has no comments on the Study.

If you have any questions, please contact me at (919) 707-8335.

Sincerely,

Elizabeth A. Hartzell
Federal Remediation Branch
Superfund Section

Cc: Charity Rychack, EMD/IR



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303**

July 30, 2013

NAVFAC Atlantic
Attn: David Cleland: OPQE3
USMC North Carolina IPT, EV Business Line
6506 Hampton Blvd
Norfolk, VA 23508-1273

SUBJ: MCB Camp Lejeune
Draft Redline Feasibility Study
Operable Unit 20, Site 86

Dear Mr. Cleland:

The Environmental Protection Agency (EPA) has completed its review of the above subject document, dated July 2013. The redline additions adequately address the items discussed during the partnering meeting. This information identifies the progress made to date and provides the information required to support remedy selection.

Additional comments have been inserted into this document on the following pages. If there are any questions, I can be reached at (404) 562-8538.

Sincerely,

Gena D. Townsend
Senior Project Manager

cc: Elizabeth Hartzell, NCDENR
Charity Rychak, MCB Camp Lejeune