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MCB CAMP LEJUENE
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EMAIL AND ATTACHED RESPONSE TO COMMENTS ON THE DRAFT PRELIMINARY
ASSESSMENT MCB CAMP LEJEUNE NC
02/22/2005
CH2M HILL

From: Skeean, Jessica/CLT
Sent: Tuesday, December 23, 2014 3:29 PM
To: Ritter, Genevieve/VBO
Subject: FW: PA Response to comments
Attachments: Response to Comments_PA sites_0205.pdf

From: Louth, Matt/VBO
Sent: Tuesday, February 22, 2005 11:18 AM
To: 'Hood, Daniel R CIV NAVFAC Lant'; 'Lowder GS12 Robert A'; townsend.gena@epa.gov; 'Randy McElveen'; Cobb GS11 Kenneth W; Bozzini, Chris/CLT; 'Rich Bonelli'; 'Kenyon, Ronald'
Cc: Skeean, Jessica/CLT
Subject: PA Response to comments

Hello to all,

Attached are the response to the comments on the Draft PA report. Please review the responses and let me know if anything needs to be clarified or if they are acceptable. Once we have approval on the responses, we will issue the Final PA report (late March-early April).

Thanks,
Matt

Response to Comments
Draft Preliminary Assessment (PA)
MCB Camp Lejeune, North Carolina

Introduction

The purpose of this document is to address comments to the Draft Preliminary Assessment Volumes I and II at Marine Corps Base Camp Lejeune, North Carolina. The U.S. Environmental Protection Agency (EPA), the North Carolina Department of Environment and Natural Resources (DENR), and the Environmental Management Division, MCB Camp Lejeune provided the comments. Response to comments are provided in bold type.

Environmental Protection Agency (EPA)'s Comments on the Draft Preliminary Assessment Marine Corps Base, Camp Lejeune, North Carolina

Per Gena Townsend's comment at the October 2004 Partnering Session, the report title will be changed to "Preliminary Assessment/Site Investigation."

The document will be renamed "Preliminary Assessment/Site Investigation".

North Carolina Department of Environment and Natural Resources Comments on the Draft Preliminary Assessment Marine Corps Base, Camp Lejeune, North Carolina

General Comment

The Draft Preliminary Assessment appears to be in good order and thoroughly communicates the investigative work that has been completed at these 12 locations of the MCB, Camp Lejeune.

Specific Comment

1. The second paragraph on page 2-23 states that VOCs, including TCE, were found in the majority of the samples surrounding buildings HP 1502, HP 1601, and HP1602. Do we have an ongoing investigation or remediation at these buildings? If not, we should.

Buildings HP 1502, HP 1601, and HP 1602 are part of Operable Unit No. 1, Site 78. Building 1502 is also an active UST Program site as discussed in the first paragraph on page 2-1 and in Appendix C.

2. The fourth paragraph on page 2-25 states that a drainage swale is located adjacent to the concrete pad staging area for the drums and tires at building HP1409. Surface soil samples should be collected in this swale during initial field investigation at building HP1409 as stated in the recommendations Section.

The fourth paragraph on page 2-25 discusses the operational history for and observations noted during the site visit to Building HP1512. The field investigation activities mentioned in the recommendations section (Section 5) were completed in July 2002 per discussion at the June 2002 Partnering Meeting. Soil samples were collected in the identified swale mentioned above during the field investigation.

3. Paragraph 2.3.1.1 on page 2-27 references Figures 1-1 and 2-3 to Building TC830 located North of IR Site 93. Figure 2-3 is of the Hadnot Point Industrial Area (HPIA) not Tent City near building 93 and therefore, does not show buildings such as TC830. Please reference appropriate Figure for TC830. The same miss reference was made to Figure 2-3 for building AS119 near the bottom of page 2-32 and for Figure 2-4 for building SM173 near the bottom of page 2-37. There may be similar reference errors throughout the report. Please check all references and make appropriate corrections.

The references will be checked and corrections will be made as appropriate.

4. The open storage area and drums in the area of building AS116 area shown in Appendix B, Photos 39 and 40 rather than 49 and 50 as stated in the first paragraph on page 2-31.

The paragraph will be corrected to reference Appendix B, Photos 39 and 40.

5. Several sections of the Assessment report emphasize that the general ground water flow across the HPIA is from east to west. However, using groundwater data from Tables 3-7, 3-8, 3-9, and Table 8 of Appendix F, it becomes clear that groundwater in the east, southeast of the HPIA flows from the west northwest to the east, southeast not to the west as stated several times throughout the report. See monitoring wells GW-21, GW-22A, GW-33, GW-34 on Figure 2-1 and monitoring data from Table 8 of Appendix F. Building 908 definitely has a groundwater flow to the east-southeast. Groundwater in the area of buildings 1120 and S1124 is borderline as to whether the groundwater flows east or west. There is very little groundwater data in this area.

Figure 3-3 shows the *general* direction of shallow groundwater across the northern portion of the HPIA to be toward the southwest. However, localized areas of water table “mounding” are evident in the vicinity of Buildings 904 and 913 (monitoring well 78-GW22A), and Building 1711 (monitoring well 78-GW03). These features are likely caused by locally increased groundwater recharge due to the presence of unpaved areas, and therefore may vary seasonally in response to precipitation and evapotranspiration. Groundwater flow directions in the vicinity of these mounds varies from northwest to southeast near Buildings 904 and 913, and north to northeast near Building 1711. Shallow groundwater flow within the southern portion of the HPIA is anticipated to be influenced toward the south or southeast due to the presence of several unnamed tributaries of Codgels Creek that trend to the southeast.

Tables 3-7, 3-8, and 3-9 refer to water level measurements for separate sites at the Air Station and Montford Point.

6. The word swale is misspelled in the second sentence of the first paragraph on page 3-26.

The spelling will be corrected.

7. PA Sites is misspelled in next to the last paragraph on page 3-28.

The spelling will be corrected.

8. The last sentence of the first paragraph on page 3-37 states that “The calculated transmissivity value of 190.62 feet²/day from the slug test is one order of magnitude higher than the average pump test value (94.92 feet²/day). As you can see 190.62 is only 2 times 94.92 not an order of magnitude (949.2). Please make appropriate corrections or clarifications.

The sentence will be corrected to say “The calculated transmissivity value of 190.62 feet²/day from the slug test is twice the average pump test value.”

9. The second paragraph on page 5-2 states that non-CERCLA issues will be directed to the appropriate RCRA program. This contact and communication is very important and should be done in writing and copied to the State CERCLA Representative.

Comment has been noted.

**MCB Camp Lejeune Environmental Management Division’s
Comments on the Draft Preliminary Assessment
Marine Corps Base, Camp Lejeune, North Carolina**

Overall a very thorough and well written report.

1. General comment: There are no buildings on Base with the prefix HP. All of the buildings listed for the Hadnot Point Area are given this tag in this report. To avoid confusion in the future either this tag needs to be removed or there needs to be some sort of clarifying statement to explain why this tag is being placed on these buildings.

A statement clarifying the “HP” prefix designation will be added to the introduction of the PA report.

2. Executive Summary Page ES-1, 2nd Paragraph, second sentence. This sentence states that this report focuses on risk posed by possible uncontrolled releases... into the environment that MAY HAVE occurred. Please add.

“May have” will be added to this sentence.

3. 3rd Paragraph, first sentence. This sentence states that the PA was performed by the Base in keeping with their efforts of A PROACTIVE APPROACH TO THE INVESTIGATION OF ENVIRONMENTAL CONTAMINATION. Please rearrange wording.

The sentence will be revised to state, “a proactive approach to the investigation of environmental contamination.”

4. 3rd Paragraph, 4th sentence. This sentence should read that the buildings were chosen based on the fact that other buildings which housed the same types of operations were previously investigated and found to have resulted in releases of contamination into the environment.

The sentence will be revised.

5. 3rd Paragraph, 5th sentence. This sentence states that a letter was sent to the EPA to remove 8 buildings from the investigation. The same letter was also sent to NC DENR. Please include.

The sentence will be revised to state that the letter was sent to EPA and NC DENR.

6. 4th Paragraph, last sentence. This sentence states that sites requiring additional investigation would probably be recommended or further activities. This should be changed to will be recommended.

The sentence will be revised.

7. Section 1.1, Page 1-2, Last Paragraph. This section states that the Air Station and Camp Geiger are considered as one urban area. This is incorrect. Although they are collocated the Bases are considered as separate entities and should be treated as such in this report. The Air Station property is owned by the Base, but the operations are handled by the Air Station which is a tenant organization. Please correct this.

This paragraph will be corrected to indicate that the Air Station and Camp Geiger operate as separate entities.

8. Section 1.2, Page 1-2, First Paragraph, Last Sentence. See comment 6.

The sentence will be revised as in comment 6 to state that, "Sites ...will be recommended for further activities..."

9. Section 1.2, Page 1-4. The list of documents used in this PA should reference the Navy/Marine Corps IR Manual, dated March 2000. Please correct.

The reference will be corrected.

10. Section 1.2, Page 1-4. The last paragraph states that the data was reviewed by assessing exposure routes or pathways and one exposure pathway. This is confusing as to what is being explained.

The last paragraph will be revised as follows:

"... all data was compiled and qualitatively reviewed by assessing hazardous substance exposure routes called pathways: three migration pathways (groundwater, surface water, and air) and one exposure pathway (soil exposure). Each pathway represents a means by which hazardous substances may impact human health and/or the environment."

11. Section 1.3, Page 1-5. The first paragraph, first sentence. See comment 3.

The wording in this sentence will be revised to that in comment 3.

12. Section 1.3, Page 1-5. The first paragraph 4th sentence describes why the sites were chosen for investigation. Please see comment 4.

The sentence will be revised to reflect the wording in comment 4.

13. Section 2.2.5, Page 2-20, Last paragraph, first sentence. This sentence states that Bld HP1409 as show... this should read as shown. Please correct.

This typographical error was found on Page 2-21 in the second paragraph, first sentence. The correction will be made.