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LETTER AND THE NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL
RESOURCES COMMENTS ON THE DRAFT PROPOSED REMEDIAL ACTION PLAN
UNEXPLODED ORDNANCE 19 (UXO-19) CAMP DEVIL DOG MCB CAMP LEJEUNE NC
11/07/2014
NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES



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

Pat McCrory
Governor

Dexter R. Matthews
Director

John E. Skvarla, III
Secretary

November 07, 2014

Mr. Bryan Beck
NAVFAC Mid-Atlantic
Code: OPCEV
NC/Caribbean IPT, EV Business Line
6506 Hampton Blvd
Norfolk, VA 23508-1273

RE: Comments on the Draft Proposed Remedial Action Plan (PRAP), UXO-19, Camp Devil Dog located at Camp Lejeune, NC
RCRA Permit Number NC6170022580
MCB Camp Lejeune
Jacksonville, Onslow County, North Carolina

Dear Mr. Beck:

The NC Superfund Section has received and reviewed the Draft Proposed Remedial Action Plan (PRAP) for Site UXO-19 at Camp Devil Dog, located at Camp Lejeune in Jacksonville, NC dated October 2014 and received for review on October 31, 2014. The following comments are offered for the partnering team's consideration. If you have any questions or comments please contact me at (919) 707-8341 or email randy.mcelveen@ncdenr.gov.

Comments

1. Next to the last paragraph on page 6 should state, “. . .with several possibly containing high explosives . . .” or other appropriate language. Please correct this Typo.
2. The PA/SI Section on page 3 should include a brief discussion of the Expanded Site Investigation (ESI) that was completed prior to the Remedial Investigation/Feasibility Study (RI/FS). Several paragraphs throughout the plan state that investigation work was completed during the RI/FS. To the best of my knowledge no field work was completed during the RI/FS. The RI/FS at Site UXO-19 compiles and summarizes the Site investigation work completed during the PA/SI and ESI.
3. The RI/FS Section on page 3 refers to ESI work as being part of the RI/FS. No active field investigation work was completed during the RI/FS.
4. There was no reduction in human contact with MEC/MPPEH during the RI as stated in the paragraph below the first bullet in the right column on page 9. All reduction in potential

human contact and other field work was completed during the PA/SI and ESI. Please make appropriate changes in this section and throughout the report.

5. Short Term Effectiveness of the alternative remedies 1 and 2 as discussed in the Evaluation of Alternatives Section on pages 10-13 and as compared and analyzed in Table 3 on page 12 should have a low relative ranking since they do nothing in the short term to reduce risk. However, since this is a UXO site and 100% geophysical mapping and intrusive investigation were completed, Alternative 2 would be effective in the short term and the long term since it restricts contact with potential Munitions and Explosives of Concern (MEC) through land use controls (LUCs).

However, Alternative 1, No Action alternative, is not effective in the short term or the long term since contact with potential MEC could occur at any time. Therefore, the relative ranking of Alternative 1 should be low (or none). In the future all no action alternatives should be not effective or have the lowest ranking in the ranking system, which in this case, is low.

If you have any questions or comments, please contact me, at (919) 707-8341 or email randy.mcelveen@ncdenr.gov

Sincerely,

Randy McElveen
Environmental Engineer
NC Superfund Section

Cc: Dave Lown, NC Superfund Section, Electronic only
Charity Rychak, EMD/IR
Dave Cleland, NAVFAC
Gena Townsend, EPA Region IV