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RESPONSE TO NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL
RESOURCES COMMENTS ON THE REDLINE DRAFT RECORD OF DECISION SITE UXO-
19, OU 25 MCB CAMP LEJUENE NC
09/24/2015
CH2M HILL

Response to Comments

Redlined Draft Record of Decision Site UXO 19, Operable Unit 25

Marine Corps Base Camp Lejeune,

North Carolina

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Introduction

The purpose of this document is to address comments on the redlined draft Record of Decision (ROD) for Site UXO-19, Operable Unit (OU) 25. The North Carolina Department of Environmental Quality (NCDEQ) and the United States Environmental Protection Agency (USEPA) provided the comments listed below. The responses to comments are provided in bolded text.

North Carolina Department of Environment and Natural Resources

Comments via e-mail (Dated September 15, 2015)

1. Section 1.1 on page 1-2, MEC/MMPH, should likely be MEC/MPPEH. If not they need to define MMPH. The same kind of typo occurs in the blue on page 2-16 also (MEC/MMPEH).

The text has been corrected.

USEPA Region 4

Comments (Dated September 17, 2015)

1. Section 2.6.4, first sentence, add "that can result in injury or death" after "MEC/MPPEH at Site UXO-19.

This text was added as requested.

2. Section 2.7, Principal Threat Wastes. first sentence, add "due to the explosive hazard that could result in injury or death" after OU 25.

This text was added as requested.

3. Section 2.7, PTW, second sentence, add that treated included "burning or igniting in controlled area in accordance with procedures or RCRA subpart X permit (or NCDENR equivalent)"

The following text was added: MEC found during the previous removal action was determined to be a principal threat waste (PTW) and was treated on site by explosive detonation in accordance with "Explosives Safety Submission (ESS), Munitions Response Activities, Camp Devil Dog (ESS-118)."

4. Section 2.7, PTW, second to last sentence: This is an acceptable sentence but EPA believes that consultation is not necessary provided the parties already acknowledge that UXO is PTW and will be treated/managed in a safe manner so that there is no longer an explosive hazard.

Comment noted, Navy legal recommended to keep the language in place.

5. Section 2.9.2 – Threshold Criteria, Overall Protection of Human Health and the Environment, second sentence: Use language similar to that above in Section 1.1 "to reduce or prevent the potential for direct physical contact with MEC/MPPEH"

This text was added as requested.

6. Section 2.9.2 – Threshold Criteria, Overall Protection of Human Health and the Environment, end of second sentence: Add "by prohibiting unauthorized intrusive activities" or something similar to language in Statutory Determination Section below.

The following text was added: "by prohibiting actions that could result in an explosive hazard"

7. Section 2.9.2 – Threshold Criteria, Compliance with ARARs, second paragraph: Add "and To Be Considered (TBC) guidance." The NC statute requiring the Notice is identified as a TBC not an ARAR despite that it is promulgated/enacted due to the nature of the requirement and legal applicability."

This text was added as requested.

8. Section 2.10.1 - Add sentence that "LUCs are being selected as the remedy for this Site because they are effective at controlling unacceptable exposure by prohibiting unauthorized intrusive activities."

The following text was added: LUCs are being selected as the remedy for this Site because they are effective at controlling unacceptable exposure by prohibiting actions that could result in an explosive hazard."

9. Section 2.10.4 – Preference for treatment as a Principal Element: Please revise to state that "The selected remedy which consists of LUCs that prevent exposure to MEC/MPPEH does not satisfy the statutory preference for treatment. As described above, previous investigations and removal actions have removed MEC/MPPEH, some of which was considered to be principal threat waste due to the explosive hazard and was burned /ignited (i.e., treated) to effectively render it safe for disposition such as disposal."

This text was added as requested.

Comments on Revised Redlined ROD (Dated September 23, 2015)

1. Section 1, 3rd paragraph, sentence 4 - Statement needs to be reworded sentence structure is incorrect.

This sentence was revised and now reads:

"The primary purpose of the FFA is to ensure that the environmental impacts associated with past and present activities at the Base are thoroughly investigated, and remediation

of hazardous substances are undertaken in accordance with CERCLA when determined necessary to protect human health and the environment.”

2. Section 2.7, second sentence. This sentence needed to say "with the approved" ESS or something to that nature. Unless the reader has an understanding of the MMRP Program and its procedures, stating "in accordance with ESS" has little meaning.

This sentence was revised to: MEC found during the previous removal action was determined to be a principal threat waste (PTW) and was treated on site by explosive detonation in accordance with the approved “Explosives Safety Submission (ESS), Munitions Response Activities, Camp Devil Dog (ESS-118)”.

3. Section 2.10.1. This should read "unauthorized intrusive activities". If there are other activities that are being prohibited to control exposure they should be listed. The key word is "prohibited".

This text was revised to: LUCs are being selected as the remedy for this Site because they are effective at controlling unacceptable exposure by prohibiting unauthorized intrusive activities.