

12/2/05-04050

Response to Comments from NCDENR Work Plan for the Expanded Site Investigation at Site UXO-04 Knox Trailer Park

PREPARED FOR: Daniel Hood (NAVFAC Atlantic)

PREPARED BY: Ed Corack (CH2M HILL)
Tom Roth (CH2M HILL)

COPIES: Bob Lowder (MCB Camp Lejeune EMD)
Randy McElveen (NCDENR)
Gena Townsend (EPA Region IV)
Matt Louth (CH2M HILL)
Dan Tomczak (CH2M HILL)

DATE: December 2, 2005

Comments on the *Draft Work Plan for the Expanded Site Investigation at the Knox Trailer Park, Munitions Response Program Site UXO-04, at Marine Corps Base, Camp Lejeune in Jacksonville, North Carolina*, CH2M HILL, October 2005, were received from Randy McElveen (NCDENR). Responses to NCDENR's comments are provided below. Replacement pages for the Final Work Plan (issued before NCDENR's comments were received) that incorporate these comments will be distributed accordingly.

Comments on the Work Plan from Randy McElveen/NCDENR

General Comments

The Draft Expanded Site Investigation Work Plan appears to be in good order and discusses basic requirements and sampling that will be completed to confirm that this site is or is not contaminated with CERCLA waste or Munitions or Explosives of Concern (MEC). It is understood that an additional work plan will be required if hazardous waste or MEC are detected during this phase of the investigation work.

Response: If it is determined that additional investigation is required, a new work plan will be prepared.

Specific Comments

1. The last sentence of the second paragraph discusses Level IV CLP criteria. CLP is defined here a characteristic leaching procedure. CLP in this context should be defined as Contract Laboratory Program. Please make appropriate corrections.

Response: The text on page 2-5 of the Work Plan will be corrected.

2. Section 2.5: The NC OSHA standard for 2,4,6-trinitrotoluene (TNT) is 0.5 mg/m³, not 1.5 mg/m³ as listed in this section. Please note: The NC OSHA standards for airborne contaminants differ from the federal standards. If your copy of the NC OSHA standards is dated prior to April, 2003, the *federal* (not state) standards appear in Subpart Z. In order to obtain the NC OSHA standards, you must go to http://ncrules.state.nc.us/ncadministrativ_/title13labor_/chapter07_/default.htm. Go to Title 13-Labor, Chapter 07, Subchapter F, Subchapter F Rules to view the OSHA standards for airborne contaminants. If your copy of the NC OSHA standards is dated April 2003 or later, the NC OSHA standards for airborne contaminants are incorporated into the manual. Please review the exposure limits in this table to be sure the NC OSHA standard for airborne contaminants has been incorporated.

Response: The NC OSHA standards will be reviewed and the correct standards will be incorporated into the Health and Safety Plan appropriately (i.e., Table 2.5 of Appendix B will be revised with the NC OSHA standards).