



Waste Management
ENVIRONMENTAL QUALITY

PAT MCCRORY
Governor

DONALD R. VAN DER VAART
Secretary

MICHAEL SCOTT
Director

August 10, 2016

NAVFAC Mid-Atlantic
Attn: Bryan Beck, Marine Corps IPT
9324 Virginia Avenue
Norfolk, VA 23511-3095

RE: Draft Uniform Federal Policy-Sampling and Analysis Plan,
Remedial Investigation at MMRP Site UXO-28, Marine Corps Installations East
MCB Camp Lejeune, Permit Number NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Beck:

The NC Superfund Section has completed review of the Draft Uniform Federal Policy-Sampling and Analysis Plan (UFP-SAP) for Remedial Investigation (RI) at MMRP Site UXO-28 Marine Corps Installations East, Camp Lejeune located in Jacksonville, NC. I understand that the lead contamination in soil at this site has been investigated and remediated under a Non-Time Critical Removal Action (NTCRA) as Site UXO-23, Former D9 Skeet Range. The NC Superfund Section has the following comments on this Sampling Analysis Plan.

1. The last paragraph on page 56 states, "The UXOQCS will inspect at least 10 percent of the intrusively investigated anomaly locations using the EM61-MK2 to determine whether the anomaly source was removed." If a high explosive (HE) is encountered during the investigation all (100%) anomalies should be confirmed to be removed using the EM61-MK2.
2. SAP Worksheet #16-Project Schedule/Timeline Table needs to be updated. The NCDEQ and EPA received this document for review on July 26, 2016 not May 9, 2016. Please make appropriate updates throughout the Table as required.
3. The second paragraph under Soil Sampling on page 65 states that the Sampling Units (SU) at the site are approximately 5 acres each and 30 to 70 aliquots of soil will be collected from accessible areas of each unit. Five acres is a huge sampling unit area. Not sure how much meaning it would have (See my comment on Figure 7a).
4. Figure 4 shows the locations of MPPEH and MEC discovered during the Non-Time Critical Removal Action for Site UXO-23. Was all MPPEH confirmed to be Munitions Declared as Safe (MDAS)? Did we encounter any High Explosives (HE).
5. Figure 7a, PQO Decision Flow chart, includes the decision "Does the average of the triplicates exceed PALs and do risk assessments show potential unacceptable risk? Or were NC SSLs exceeded?" As I stated above the Sampling Units area very large, therefore, each ISM Sample should be reported and grid samples collected if the SSLs or risks are exceeded. Averaging the triplicates of large sampling units with ISM samples (30 to 70) like this would seem to give meaningless data results.



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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 Delaney, EMD/IR
Jennifer Tufts, USEPA
Dave Cleland, NAVFAC