

State of North Carolina
Department of Environment
and Natural Resources
Wilmington Regional Office
Division of Waste Management
UST Section



Michael F. Easley, Governor
William G. Ross Jr., Secretary
Dexter R. Matthews, Director

August 15, 2002

Nikki
8/19

Ms. Nikki Hall
Attn: Director, I & E/EMD/EQB
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

Subject: No Further Action
USMC-Camp Lejeune-Bldg. 1612
Incident No. 23007
Camp Lejeune
Onslow County

Dear Ms. Hall:

The Division has reviewed the file for the subject incident site in reference to the information provided to this office today. Information contained within the Re-Sampling Report performed by OHM Remediation Services Corporation shows that contaminated soil was removed to below regulatory action levels. The previous report (20-Day Report) for this site showed that contaminated soil was encountered during tank abandonment. The Re-Sampling Report also showed that groundwater was not contaminated above 2L standards. Therefore, no further action is required at this time for the subject incident.

If you have any questions concerning this letter, please contact Bruce Reed at (910) 395-3900.

Sincerely,

David R. Holsinger, P.E.
Regional Supervisor

DH/BR

cc: WiRO-UST

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State of North Carolina
Department of Environment
and Natural Resources
Wilmington Regional Office
Division of Waste Management
UST Section

Michael F. Easley, Governor
William G. Ross Jr., Secretary



March 15, 2001

Ms. Nikki Hall
United States Marine Corps
PSC Box 20004
Camp Lejeune, NC 28542-0004

RE: Notice of Regulatory Requirements
15A NCAC 2L .0115(c)
RISK-BASED ASSESSMENT AND
CORRECTIVE ACTION FOR PETROLEUM
UNDERGROUND STORAGE TANKS
USMC-Camp Lejeune-Bldg. 1612
Camp Lejeune
Onslow County, N.C.
Incident No. Pending

Dear Ms. Hall:

Information received by this office on March 14, 2001, confirms a release or discharge from a petroleum underground storage tank (UST) system at the above referenced location. Records indicate that the USMC is the owner and/or operator of this UST tank system. This letter is a standard notice explaining the actions that the USMC must take as a result of the release or discharge in accordance with North Carolina statutes and rules. The UST Section of the Division of Waste Management administers the state's rules for USTs and the required response for petroleum releases. Those rules are located in Title 15A, Subchapter 2L and Title 15A, Subchapter 2N of the North Carolina Administrative Code (NCAC).

As a responsible party, the USMC is required to comply with the release response and corrective action requirements of 15A NCAC 2L .0115(c), which include the requirements established in 15A NCAC 2N. Listed is a general description of actions that the USMC must take to comply with State rules. For a detailed description of your requirements please refer to the enclosed rules and the January 1998 Groundwater Section Guidelines for the Investigation and Remediation of Soil and Groundwater, Volume II ("the Guidelines"). The Guidelines are available on the Internet at <http://ust.ehnr.state.nc.us> or may be purchased from the UST Section for a fee of \$7.00. To purchase a copy of the Guidelines, please send a check made payable to DENR to:

DENR/DWM/UST Section
1637 Mail Service Center
Raleigh, NC 27699-1637

Required Actions:

- 1) If the USMC has not already done so, the USMC must take immediate action to prevent any further release of the regulated substance into the environment and to identify and mitigate any fire, explosion and vapor hazards; remove any free product; and comply with the requirements of Rules .0601 through .0604 and .0701 through .0703 and .0705 of Subchapter 2N;
- 2) Incorporate the requirements of 15A NCAC 2N .0704 into the report to be submitted in accordance with 15A NCAC 2L .0115 (c)(3) or (c)(4), whichever is applicable (see Item #3 below). This shall constitute compliance with the reporting requirements of 15A NCAC 2N .0704(b);
- 3) If the USMC can demonstrate that no soil remains in the unsaturated zone in the sidewalls and at the base of the UST system excavation with contaminant levels exceeding either the "soil-to-groundwater" or the residential maximum soil contaminant concentrations (See Guidelines), whichever are lower, then submit a Soil Contamination Report in accordance with 15A NCAC 2L.0115(c)(3). The Soil Contamination Report, if applicable, is due in this office within **90 days** of the date of receipt of this notice. Upon approval of this report, the Department will issue a notice indicating that no further action related to this incident is required; or,
- 4) If the requirements of 15A NCAC .0115(c)(3) cannot be met as described in Item #3 above, submit a Limited Site Assessment (LSA) Report in accordance with 15A NCAC 2L .0115(c)(4), containing information needed by the Department to classify the level of risk to human health and the environment posed by the discharge or release. The LSA Report is due in this office within **120 days** of the date of receipt of this notice. Based on a review of the information submitted in the LSA, the Department will classify the risk of the discharge or release as high, intermediate or low. At that time, the Department will also classify the land use of the site as either residential or industrial/commercial. The USMC will be notified of the risk and land use classifications once review of the LSA Report is completed.

If the USMC believes that any of the information requested above has already been submitted, please notify me of the date, title, and content of the documents that contain the information.

State of North Carolina
Department of Environment
and Natural Resources
Wilmington Regional Office
Division of Waste Management
UST Section

Michael F. Easley, Governor
William G. Ross Jr., Secretary



March 22, 2001

Ms. Nikki Hall
United States Marine Corps
PSC Box 20004
Camp Lejeune, NC 28542-0004

Subject: Review of 20 Day Report
USMC-Camp Lejeune-Bldg. 1612
Incident No. Pending
Camp Lejeune
Onslow County

Dear Ms. Hall:

Thank you for submitting the subject report to this office on March 14, 2001. The Division has reviewed this report and regrets to inform the USMC that it can not accept the laboratory data that was found within the report. A cursory review of the laboratory data indicates, at a minimum, the following problems:

- The MITKEM laboratory is not NC certified to perform VPH and EPH tests;
- The VPH and EPH results were not reported in the format required by/under the Guidelines/policy;
- The STL-Miami laboratory is not NC certified to perform any tests;
- The STL-Tampa laboratory did not report the test results on report forms that listed STL as the laboratory of record;
- Transfer of data from STL-Miami and reported under STL-Tampa report forms is not allowed (they must be reported from the lab that ran the tests);
- All report forms must be signed by the responsible party of the lab doing the analyses;
- All methods must be listed with each set of data on each report form (i.e., if a subset of analytes (BTEX) is requested by the agency, then the lab must report benzene, toluene, ethyl benzene and xylenes reported by a specific method number (such as EPA Method 602 or 8021 or 624 or 8260);

Ms. Nikki Hall
March 22, 2001
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- Chemical Analytical Data Review Sheet for Camp Lejeune: The letterhead was from OHM Remediation for the Mitkem lab in Rhode Island.

As indicated above, other additional problems may be associated with the laboratory work. The Division of Water Quality (DWQ) Chemistry Laboratory is responsible for laboratory certification. If you have any questions concerning NC laboratory certification, you may call the DWQ Chemistry Laboratory at (919) 733-3908. A list of NC Certified laboratories for the VPH/EPH has already been faxed to your attention. Website names were sent to you and Ms. Ruether via U.S. Mail on March 22, 2001, from which you can find policy letters and regulations pertaining to VPH/EPH testing and laboratory certification.

Based upon the above referenced problems associated with the analytical results associated with the subject incident, the Division cannot accept these results. The USMC must resample and reanalyze soil samples in order to achieve compliance with NC rules, regulations, and policy.

If you have any questions concerning this letter, please contact me at (910) 395-3900.

Sincerely,



David R. Holsinger
Regional Supervisor

DH/BR

cc: Steve Tedder (DWQ Chemistry Lab)
WiRO-UST

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