

## **Arnold CIV Johanna E**

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**From:** Bruce Reed [Bruce.Reed@ncmail.net]  
**Sent:** Wednesday, August 13, 2008 3:27 PM  
**To:** Arnold CIV Johanna E  
**Subject:** Review of 2008 AMR and 8/13/08 Supplement: Incident #23297 CSFF and AS-142

Johanna:

Pursuant to the above data and the fact that the Base has requested incident closure on this site, the site risk is now low, and the incident (#23297) is now ready for incident closure upon receipt of a Notice of Residual Petroleum. This incident also includes AS-142.

Regards,

Bruce Reed  
WiRO-UST

## Arnold CIV Johanna E

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**From:** Arnold CIV Johanna E  
**Sent:** Wednesday, August 13, 2008 2:44 PM  
**To:** 'Bruce Reed'  
**Subject:** RE: Campbell Street Fuel Farm 08 AMR: Inc#23297  
**Signed By:** johanna.arnold@usmc.mil

**Attachments:** Revised map for AS-4151 area (Campbell Street Fuel Farm ); 7\_12\_2007 letter and Base response.pdf



Revised map for 7\_12\_2007  
AS-4151 area (letter and Base resp

Bruce,  
Nikki has reviewed your 7/12/2007 letter and our response letter dated 10/24/2007 (attached). She thought that all paragraphs were addressed. In regards to paragraph 3: I am including my email dated 5/23/08 (Subject 'Revised map for AS-4151 area (Campbell Street Fuel Farm)'). The CATLIN letter in that email may provide the needed information. The Tank Closure Reports Addendums for AS-4151-1 and -2 are in our chain for signature. Analytical results for the soil samples are below State action level.  
Please let me know whether this will suffice.  
V/R Johanna

-----Original Message-----

From: Bruce Reed [mailto:Bruce.Reed@ncmail.net]  
Sent: Tuesday, August 12, 2008 13:59  
To: Arnold CIV Johanna E  
Subject: Re: Campbell Street Fuel Farm 08 AMR: Inc#23297

Johanna:

That was good news. So, no socks for the last year???? You know me, I like a little meat and potatoes with my gravy :-)

Thanks,

Bruce Reed

Arnold CIV Johanna E wrote:

Bruce,

Please find attached the gauging data for June/Jul/Aug 2008 for MW-26 and MW-27 at CSFF.

I have tasked Nikki Hall to review our response letter to your 7/12/2007 letter to CO and Andrew Smith. She will let me know where we have not provided a sufficient answer to your questions and concerns. This may take another week or so (until after Partnering Meeting).

V/R Johanna Arnold

-----Original Message-----

From: Bruce Reed [mailto:Bruce.Reed@ncmail.net]  
Sent: Wednesday, August 06, 2008 9:27  
To: Arnold CIV Johanna E  
Cc: Bruce Reed  
Subject: Campbell Street Fuel Farm 08 AMR: Inc#23297

Johanna:

I have read the most recent AMR for Incident #23297. Please send gauging data as soon as it is available, say after 8/31/2008, for wells MW-26 and MW-27. I need a years worth of data, from when product was last detected for closure, and right now, we are pretty close to one year. MW-27 was first gauged on 8/31/2007, and MW-26 first gauged on 6/29/2007. I am assuming that no socks have been placed in these wells. They weren't mentioned in the report.

Additionally, I am looking at our 7/12/2007 letter addressed to CO and Andrew Smith. I need answers to those questions/concerns in the second, third, and fourth paragraphs. It seems like Catlin may have submitted something for the fourth paragraph, but maybe it is in another file. If you could just group together a response to these concerns, we can then evaluate where to go from here.

Thank you,

Bruce Reed  
WiRO-UST

---

Subject:  
RE: CSFF: gauging data for MW-26 and MW-27  
From:  
"Shaun Whitworth" <SWhitworth@osageva.com> <mailto:SWhitworth@osageva.com>  
Date:  
Tue, 12 Aug 2008 11:06:38 -0400  
To:  
"Arnold CIV Johanna E" <johanna.arnold@usmc.mil>  
<mailto:johanna.arnold@usmc.mil>  
To:  
"Arnold CIV Johanna E" <johanna.arnold@usmc.mil>  
<mailto:johanna.arnold@usmc.mil>  
CC:  
"Theresa Ellerman" <tellerman@osageva.com> <mailto:tellerman@osageva.com>

Hi Johanna,

Please see attached gauging data for CSFF MW-26 and MW-27 for June, July, and August, 2008. Additionally, there are no socks in any of the wells out there.

Thank You,

Shaun C. Whitworth

Osage of Virginia, Inc.

2618A Colley Avenue

Norfolk, Virginia 23517-1132

Office: 757 440-0400 / Facsimile: 757 440-0411

Cellular: 757 408-2349

e-mail: [swhitworth@osageva.com](mailto:swhitworth@osageva.com) <<mailto:mccree@osageva.com>>

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[www.osageva.com](http://www.osageva.com) <<http://www.osageva.com>>

From: Arnold CIV Johanna E [<mailto:johanna.arnold@usmc.mil>]  
Sent: Wednesday, August 06, 2008 10:04 AM  
To: Michael J. Cree  
Cc: Theresa Ellerman; Shaun Whitworth  
Subject: CSFF: gauging data for MW-26 and MW-27

Mike, Theresa,

Bruce Reed has contacted me regarding the gauging data for CSFF MW-26 and MW-27. He is reviewing the SOVEREIGN AMR for CSFF and would like to use the gauging data for his response. Sovereign stopped their work at the end of May. Bruce Reed wants a full one-year set of gauging data (to include the August 2008 results) for MW-26 and MW-27. Therefore, please send me the results AFTER you have the August gauging data. Also, can Theresa confirm that no socks have been placed in the wells?

V/R Johanna

## Arnold CIV Johanna E

---

**From:** Arnold CIV Johanna E [johanna.arnold@usmc.mil]  
**Sent:** Friday, May 23, 2008 2:06 PM  
**To:** Bruce Reed  
**Subject:** Revised map for AS-4151 area (Campbell Street Fuel Farm )  
**Signed By:** johanna.arnold@usmc.mil

**Attachments:** Revised map for AS-4151 area.pdf



Revised map for  
AS-4151 area.p...

Bruce,

Please find attached the revised map for the AS-4151 area in the Remedial Action Optimization & Revised Corrective Action Plan Addendum Report for the Campbell Street Fuel Farm.

Please let me know if you would like to receive the original map and letter in hard copy format.

V/R Johanna

Johanna E. Arnold, Ph.D.  
Environmental Control Specialist  
Marine Corps Base Camp Lejeune  
EMD/EQB, Bldg. 12, Room 235  
Phone: 910-451-9114  
DSN: 751-9114  
Fax: 910-451-5997  
e-mail: johanna.arnold@usmc.mil



Post Office Box 10279  
Wilmington, NC 28404-0279  
Telephone: (910) 452-5861  
Fax: (910) 452-7563

May 22, 2008

Commanding Officer  
Attn: I&E/EMD/EQB  
Ms. Johanna E. Arnold, Ph.D.  
PSC BOX 20004  
MCB Camp Lejeune, NC 28542-0004

RE: **Risk-Based Soil Sampling  
Locations at the Building AS-4151 Area**  
Marine Corps Air Station  
New River, North Carolina  
Navy Contract No. N62470-05-D-6200  
Delivery Order No. 005  
CATLIN Project No. 205-043

Ms. Arnold,

This letter is in response to comments by Mr. Bruce Reed of the North Carolina Department of Environment & Natural Resources (NCDENR). Mr. Reed stated in a letter dated July 12, 2007 that the locations of risk based soil samples collected from the Building AS-4151 area in December 2005 were not located in the most contaminated areas as illustrated in the 1994 Corrective Action Plan (CAP).

The 1994 CAP illustrated the areas of highest contamination around the interceptor trench, abandoned fuel line and existing fuel line. Therefore, prior to the collection of the risk-based soil samples at the Building AS-4151 area, a utility locate was performed to verify the location of these subsurface features and any additional underground utilities. Following the location all subsurface features, CATLIN Engineers & Scientists (CATLIN) collected seven risk-based soil samples in areas previously indicated as containing the highest contamination within the 1994 CAP. The risk based soil sample locations were selected based on figures provided in the 1994 CAP. All of the risk based soil sample locations were surveyed utilizing Global Positioning System (GPS) Technology and imported on to a site map adapted from the Camp Lejeune Geographic Information System (GIS) database. The Building AS-4151 area site map was used as the base map for the figures provided in the February 2006 Remedial Action Optimization & Revised Corrective Action Plan (RAO & RCAP) Addendum Report by CATLIN.

Based on the utility locate and a site survey conducted by CATLIN in August 2007, it was determined that the locations of the interceptor trench, abandoned fuel line, existing fuel line and other site features were inaccurately illustrated on the figures used in the RAO & RCAP Addendum Report. Therefore, in March 2008, CATLIN conducted a full survey of the Building AS-4151 area utilizing GPS technology. The data generated from the March 2008 survey was used in conjunction with the GPS data collected during the December 2005 sampling event to produce an amended Building AS-4151 area site map. The amended Building AS-4151 area site map has been provided with this letter.

Based on the amended Building AS-4151 area site map provided within, CATLIN believes that the December 2005 risk-based soil samples were representative of the most contaminated areas as indicated in the 1994 CAP. Furthermore, since all analytical results of the December 2005 sampling event were below the applicable Industrial/Commercial MSCCs, the December 2005 sampling event conclusively demonstrated that the soil in the Building AS-4151 area was below the risk based levels.

If you have any questions or comments please feel free to contact us at (910)-452-5861.

Sincerely,

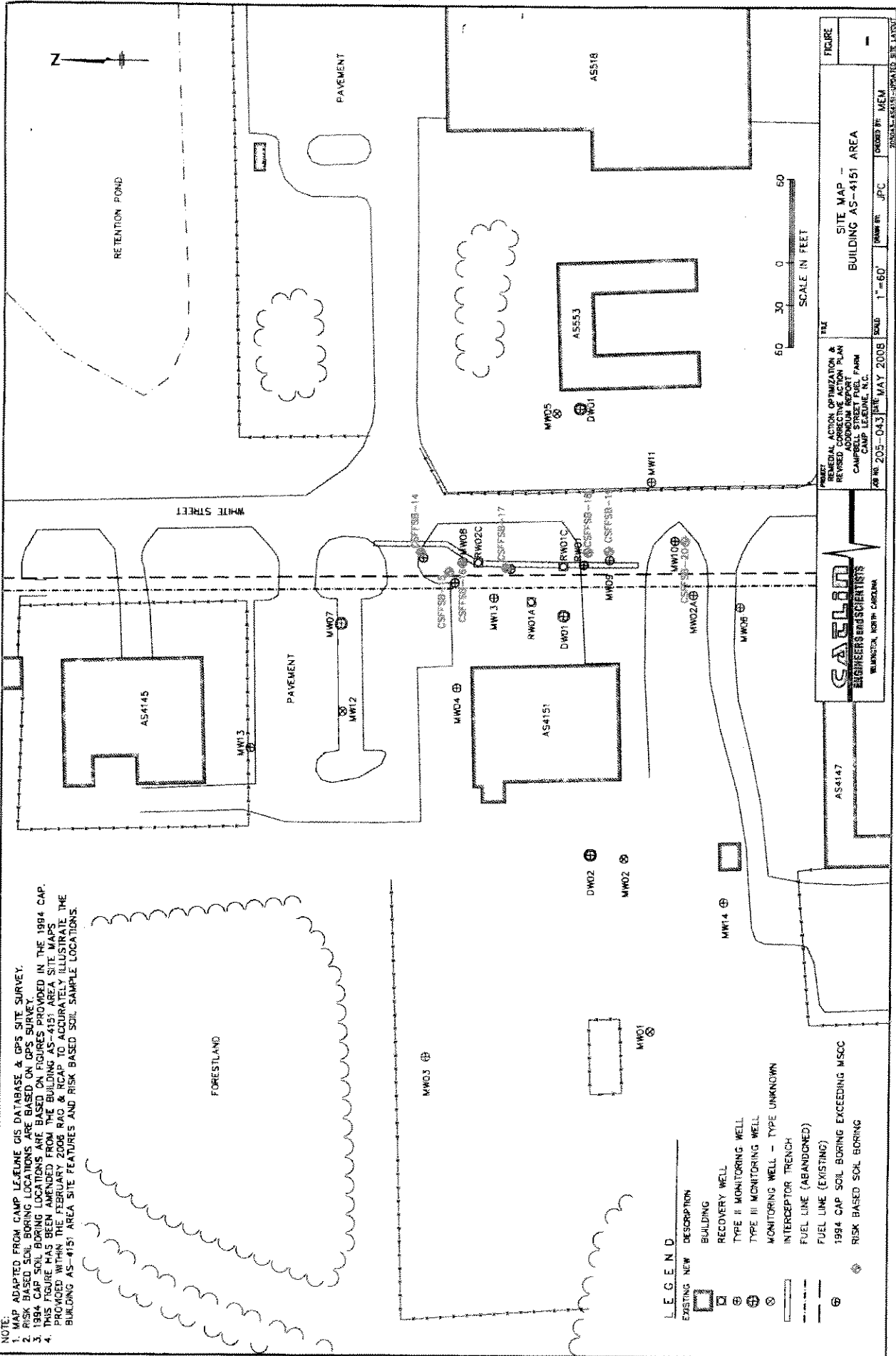


Michael E. Mason, P.E.  
Program Manager



Jeffery K. Becken, P.E.  
Project Manager

- NOTE:
1. MAP ADAPTED FROM CAMP LEJUNE GIS DATABASE & GPS SITE SURVEY.
  2. RISK BASED SOIL BORING LOCATIONS ARE BASED ON GPS SURVEY.
  3. 1984 CAP SOIL BORING LOCATIONS ARE BASED ON FIGURES PROVIDED IN THE 1984 CAP.
  4. THIS FIGURE HAS BEEN AMENDED FROM THE BUILDING AS-4151 AREA SITE MAPS PROVIDED WITHIN THE FEBRUARY 2006 RAO & RCAP TO ACCURATELY ILLUSTRATE THE BUILDING AS-4151 AREA SITE FEATURES AND RISK BASED SOIL SAMPLE LOCATIONS.



**LEGEND**

- EXISTING NEW
- BUILDING
- RECOVERY WELL
- TYPE II MONITORING WELL
- TYPE III MONITORING WELL
- MONITORING WELL - TYPE UNKNOWN
- INTERCEPTOR TRENCH
- FUEL LINE (ABANDONED)
- FUEL LINE (EXISTING)
- 1984 CAP SOIL BORING EXCEEDING MSCC
- RISK BASED SOIL BORING

PROJECT	TRAIL	FIGURE
FEDERAL ACTION OPERATIONS & REVISIONS CORRECTIVE ACTION PLAN		---
CAMPBELL STREET FUEL FARM		
CAMP LEJUNE, N.C.		
JOB NO. 205-043	DATE: MAY 2008	SCALE: 1"=60'
DESIGNED BY: JFC	DRAWN BY: JFC	CHECKED BY: MEM



AS4147



UNITED STATES MARINE CORPS  
MARINE CORPS BASE  
PSC BOX 20004  
CAMP LEJEUNE, NORTH CAROLINA 28542-0004

READ FILE

IN REPLY REFER TO:  
5090.10  
BEMD  
OCT 24 2007

Mr. Bruce Reed  
North Carolina Department of Environment  
and Natural Resources  
Division of Waste Management  
Underground Storage Tank Section  
127 Cardinal Drive  
Wilmington, North Carolina 28405-3845

Dear Mr. Reed:

This is in response to your letter dated July 12, 2007 regarding the review of report entitled "Annual Groundwater Monitoring Report 2006-2007, Campbell Street Fuel Farm". As recommended in your letter, a new monitoring well (MW-26) was installed on June 20, 2007 to replace MW-13. In addition, we installed an additional shallow well (MW-27) on July 24, 2007 approximately 10 feet southwest of MW-13 as suggested in your letter. Both wells have been gauged and added to the monthly gauging plan.

We have reviewed the results of soil sampling at site AS-4151 and compared the data from the 1993 Annual Monitoring Report (AMR) with results from the 2006-2007 AMR. The data demonstrates a significant decrease in contaminant levels to below the applicable Industrial/Commercial MSCC. Furthermore, sampling data indicate that excavation of soil in the vicinity of AS-4151 is no longer warranted.

In response to paragraph three of your letter, the Defense Energy Supply Center (DESC) project referenced is not related to the excavation of soils or removal of the abandoned pipeline.

Catlin Engineers and Scientists (CATLIN) who performed the risk-based soil sampling at AS-4151 in December 2005 has determined that the sampling locations were inaccurately illustrated on the figures of the Remedial Action Optimization and Revised Corrective Action Plan (RAO & RCAP). Prior to collecting the soil samples, CATLIN initiated a utility locate to verify the location of the abandoned fuel line, existing fuel line, and additional underground utility lines. CATLIN then collected seven (7) risk-based soil samples proximate to the existing and abandoned fuel lines. CATLIN has recently

5090.10

BEMD

OCT 24 2007

determined that the actual locations of the soil samples is approximately 15-20 feet east of the locations indicated on the figures in the February 2006 Addendum to the RAO & RCAP and other previous reports. We conclude that the soil samples were representative of the most contaminated areas of the AS-4151 area as indicated in the 1994 Corrective Action Plan. Therefore, the December 2005 sampling event demonstrated that the soil in the AS-4151 area was below risk-based levels.

We have searched the archives in our office and at CATLIN's office for the closure reports for AS-4151-1 and AS-4151-2. These sites were reportedly closed in the mid 1990s. Unfortunately, we have been unable to find these reports.

If you have questions or require more information, please contact Mr. Andrew Smith, Environmental Quality Branch, Environmental Management Division, Installations and Environment Department, at (910) 451-9017.

Sincerely,



JOHN R. TOWNSON  
Director, Environmental Management  
By direction of  
the Commanding Officer

Copy to:  
NAVFACENGCOM (Mr. Dan Oros Code OPCEV4)  
Catlin (Mr. Mike E. Mason)

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

July 12, 2007

Commanding Officer  
Attn: I&E/EMD/EQB (Mr. Andrew Smith, Bldg. 12)  
PSC Box 20004  
MCB Camp Lejeune, NC 28542-0004

Subject: Review of Report Entitled  
"Annual Groundwater Monitoring  
Report 2006-2007"  
Campbell Street Fuel Farm  
Campbell and White Streets  
Camp Lejeune, Onslow County  
Incident No. 23297  
Intermediate Risk Classification

Dear Mr. Smith:

Thank you for submitting the subject report to the Division on June 29, 2007. The recommendations in the report are satisfactory. However, the Division suggests that the Base compare the soil contaminant detections, which had no standard, to the appropriate MADEP standard to see if standards have been achieved prior to performing additional soil sampling for the two referenced compounds. Also, it is recommended that the Base reinstall monitoring well MW-13, as well as an additional shallow monitoring well about 10 feet south-southwest of MW-13 to ensure that the free-product around MW-13 has been adequately delineated and removed. This new well must also be outside of the area that was recently excavated around MW-13. These two wells must be installed and gauged within the next 120 days, and of course, added to the gauging plan.

In addition to the above recommendations, please assure that the Base has cleaned up AS-4151 to appropriate standards prior to requesting closure of Incident No. 23297. UST incidents at AS-142/143, CSFF, and AS-4151 have been grouped together since product recovery trenches were constructed at all three sites. The subject report stated that soil excavation was the listed remedy for the soil contamination associated with the eastern portion of Building AS-4151, and that the excavation of the contaminated soil has not been performed to-date.

127 Cardinal Drive, Wilmington, North Carolina 28405

Phone: 910-796-7215 / Fax: 910-350-2004 / Internet: [www.enr.state.nc.us](http://www.enr.state.nc.us)

*Why wasn't excavation of AS-4151 done already if recommended in 1998?*

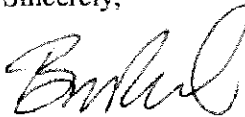
7 The file shows that excavation was recommended as far back as 1992 and was the listed remedy in the Corrective Action Plan (CAP) received on December 14, 1994. The Division has learned that DESC has never approved funding for the removal of the old fuel line or the contaminated soil that was found around that line.

Further review of the file indicates that risk-based soil sampling was performed at the area east of the former fuel line in the area of AS-4151 in December 2005. This sampling did not occur in some of the most contaminated areas as illustrated in the original CAP, and thus did not conclusively demonstrate that the soil was below risk-based levels. At this point, the Base has two options in regard to the referenced soil contamination: remove it; or demonstrate that it is below appropriate risk based levels. Either option that the Base chooses in respect to this topic is due no later than 120 days.

7 The Division can not find that closure reports have been submitted for AS-4151-1 and AS-4151-2. Both of these USTs were registered and reportedly removed in the mid-1990's. Please provide closure reports for these tanks. These reports are due within 120 days. If they can not be found, please contact me and I will see if our Central Office has them, by chance.

If you have any questions concerning this letter, please contact me at (910) 796-7400.

 Sincerely,



Bruce Reed  
Hydrogeologist II

cc: WIRO-UST

s:\ust\bruce\smithcsff.jul

UNITED STATES MARINE CORPS

MARINE CORPS BASE

PSC Box 20004

Camp Lejeune, North Carolina 28542-0004

READ FILE

In reply refer to:

6287

BEMD

Mr. Bruce Reed  
North Carolina Department of Environment  
and Natural Resources  
Division of Waste Management  
Underground Storage Tank Section  
127 Cardinal Drive  
Wilmington, North Carolina 28405-3845

17 JUN 2003

Dear Mr. Reed:

Enclosed is the Leaking Underground Storage Tank (UST) Phase II Limited Site Assessment for Site AS-142, prepared in response to a Notice of Regulatory Requirements letter dated May 17, 2002. This site is located aboard Marine Corps Air Station, New River, North Carolina.

One 10,000-gallon gasoline UST, located northwest of Building AS-143, was removed December 12, 2000. During previous site investigations, soil contamination was identified but did not exceed Industrial/Commercial Maximum Soil Contaminant Concentrations. Groundwater samples also revealed contamination, notably Benzene at levels greater than ten times 2L Groundwater Quality Standards. As part of this investigation, Catlin sampled five existing monitoring wells. Several target analytes were discovered above 2L Standards; however, none exceeded Gross Contaminant Levels. Our consultant recommends that this site be classified as "Low Risk," in which case it will be a candidate for No Further Action.

If you have additional questions or need further information, please contact Ms. Nikki Hall, Environmental Quality Branch, Environmental Management Division, Installations and Environment Department, at (910) 451-9610.

Sincerely,



SCOTT A. BREWER, PE

Director, Environmental Management

By direction of

the Commanding General

## FAX TRANSMITTAL

29 May 02  
# of pages ▶ 1/1

To	Mike E. Mason	From	Nikki Hall
	CALVIN	Phone #	910.451.9610
	452.7563	Fax #	.5997
317-7368		5099-101 GENERAL SERVICES ADMINISTRATION	

**NCDENR**NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES

**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**

Work funded 8/1002

May 17, 2002

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

**Subject: Review of Reports Entitled "Limited  
Site Assessment"  
USMC-Camp Lejeune-Bldgs AS-142  
and 1502/2  
Incident No. 23297 and 23299  
Camp Lejeune, Onslow County**

Dear Ms. Hall:

Thank you for providing the subject reports to this office on April 4, 2002. However, the reports do not meet the requirements of 15A NCAC 2L .0115(c)(4)(F), and are considered incomplete. Since groundwater analytical results exceeded 2L standards by more than a factor of ten and "regulated / commercial" USTs were located at these sites, four additional monitoring wells should have been constructed and sampled at each of the sites. Furthermore, at incident site 1502/2, a source area monitoring well was not placed at a source area (the dispensing island for tanks three and four). Also, the monitoring well for the tank three and four source areas should have been constructed five feet to the east where a highly contaminated soil sample (1502-4-2) was collected. Please address these concerns to achieve compliance with 15A NCAC 2L .0115(c)(4)(F) immediately for both of the subject incidents.

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: Cindy Rintoul  
WiRO-UST

s:\ust\bruce\hall\sa.may

LAST TRANSACTION REPORT FOR HP FAX-700 SERIES

VERSION: 01.03

FAX NAME: EMD IRD  
 NUMBER: 910 451 5997

DATE: 21-MAY-02  
 TIME: 14:16

DATE	TIME	REMOTE FAX NAME AND NUMBER	DURATION	PG	RESULT	DIAGNOSTIC
21-MAY	14:15 S	+9104527563	0:00:39	1	OK	663840100190

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OPTIONAL FORM 99 (7-90)

**FAX TRANSMITTAL**

# of pages ▶ /

To <i>Mike Mason</i>	From <i>Dilki</i>
Dept/Agency	Phone #
Fax # <i>910-452-7563</i>	Fax # <i>910-451-5997</i>
NSN 7540-01-317-7368	5099-101 GENERAL SERVICES ADMINISTRATION

*250  
 x 20  
 5000 ft  
 @ piping*

FAX NAME: EMD IRD  
F NUMBER: 910 451 5997

DATE: 21-MAY-02  
TIME: 14:14

DATE	TIME	REMOTE FAX NAME AND NUMBER	DURATION	PG	RESULT	DIAGNOSTIC
21-MAY	14:13 S	757 322 4805	0:00:39	1	OK	663840100166

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OPTIONAL FORM 99 (7-90)

**FAX TRANSMITTAL**

# of pages ▶ 1

To <i>M.S. Reuther</i>	From <i>Nikki</i>
Dept./Agency	Phone #
Fax # <i>910-262-4804</i>	Fax # <i>910-451-5997</i>

NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION

*Julia -*

*21 May 02*

*Please fax to Mike E. Mason (CATLIN)  
& Lori Reuther (LANTDIV)  
When you get a chance.*

*TQ!! Nikki*

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



June 15, 2001

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

Info sent to LR 7/9/2001  
~~Work funded~~ 8/2001  
Funds Req sent to Bldg 1

RE: Notice of Regulatory Requirements  
15A NCAC 2L .0115(c)  
RISK-BASED ASSESSMENT AND  
CORRECTIVE ACTION FOR PETROLEUM  
UNDERGROUND STORAGE TANKS  
USMC-Camp Lejeune, AS-142-1  
Camp Lejeune, Onslow County, N.C.  
Risk: Unconfirmed  
Incident No. Pending

Dear Ms. Hall:

Information received by this office on February 20, 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:

Ms. Nikki Hall  
June 15, 2001  
Page 2

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 your 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.

Ms. Nikki Hall  
June 15, 2001  
Page 3

The USMC's prompt attention to the items described herein is required. Failure to comply with the state's rules in the manner and time specified, may result in the assessment of civil penalties and /or the use of other enforcement mechanisms available to the State. Each day that a violation continues may be considered a separate violation. If the USMC believes that it is not the responsible party notify the UST Section within 15 days of receipt of this letter.

Please note that performing assessment and cleanup work that is not required under 15A NCAC 2L.0115 is not reimbursable from the Commercial or Noncommercial Leaking Petroleum Underground Storage Tank Cleanup Funds.

If the USMC has any questions regarding the actions that must be taken or the rules mentioned in this letter, please contact me at the letterhead address and/or at (910) 395-3900. If the USMC has any questions regarding trust fund eligibility or reimbursement, please contact the UST Section in Raleigh at (919) 733-8486.

Sincerely,



Bruce Reed  
Hydrogeologist II

BR

cc: Ruth Strauss  
George O'Daniel (Onslow County Health Dept.)  
WiRO-UST

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