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FROM: DIRECTOR
TO: EQB
RETURN:
COPY:

SUBJECT: REVIEW OF FINAL SOIL SAMPLING REPORT, CAMPBELL STREET FUEL FARM INCIDENT
NUMBER 23297 & 94068

COMMENTS:

*Byrd/Erwin/Nick -
fyi + sched.
JCL*

ROUTING: Originator: J LEDFORD Initials: JCL Date: 3/24/2010
1. J TOWNSON Initials: *JCL* Date: 3/24/10
2. Initials: Date:
3. Initials: Date:

RECEIVED MAR 24 2010

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North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

Division of Waste Management
Underground Storage Tank Section

Dexter R. Matthews, Director

March 15, 2010

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

Subject: Review of Final Soil Sampling Report
USMC-Camp Lejeune, Campbell Street Fuel Farm
Marine Corps Air Station, Onslow County
Incident Number: 23297 & 94068

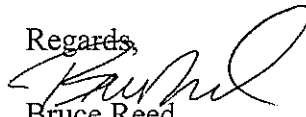
Dear Mr. Schultz:

On March 11, 2010, the Underground Storage Tank Section Wilmington Regional Office received the subject report. The report has been reviewed, and the Section has the following comments:

- The boring log for SB-01 stated that a strong hydrocarbon odor was detected from approximately 3 to 5 feet. The soil sample for SB-01 was obtained from 2-3 feet, and was fairly clean. The proposed excavation is said to be performed to approximately 5 feet. The Section suggests that this mass of contamination be completely removed, even though some of it may be located in the water table.
- If any obvious signs of contamination are encountered when the contaminated soil is removed, these areas should also be removed, and depending on the location of these areas to the clean soil sampling locations already on record, some confirmation sampling may be necessary to document the additional areas.

Thank you for submitting the subject report. Any questions should be directed to me at (910) 796-7400.

Regards,



Bruce Reed
Hydrogeologist II

cc: WiRO-UST (2)
s:\bruce\schultzust#8area.mar



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

RECEIVED
OCT 26 2009

IN REPLY REFER TO
5090.10
BEMD
OCT 19 2009

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:

Enclosed is the Final Soil Contamination Report Addendum for the November 2006 Manhole Release at the Campbell Street Fuel Farm located aboard Marine Corps Air Station, New River, North Carolina. This report recommends no further action and requests the site's inclusion in the North Carolina Department of Environment and Natural Resources Incident #23297 as No Further Action with Land Use Restrictions. Please review the report and provide your comments.

If you have any questions or require further information, please contact Mr. Nick Schultz, Environmental Quality Branch, Environmental Management Division, Installations and Environment Department, at (910) 451-9114.

Sincerely,

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

Enclosure: 1. Final Soil Contamination Report Addendum for
Campbell Street Fuel Farm, November 2006
Manhole Release

Copy to: (w/o encl)
NAVFACENGCOM (Mr. Dave Borton Code OPCEV4)
CATLIN (Mr. Mike E. Mason)/

Arnold CIV Johanna E

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

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:mccree@osageva.com>>

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HUBZone Certified 31Jan05

8(a) Certified 06Sep05

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,

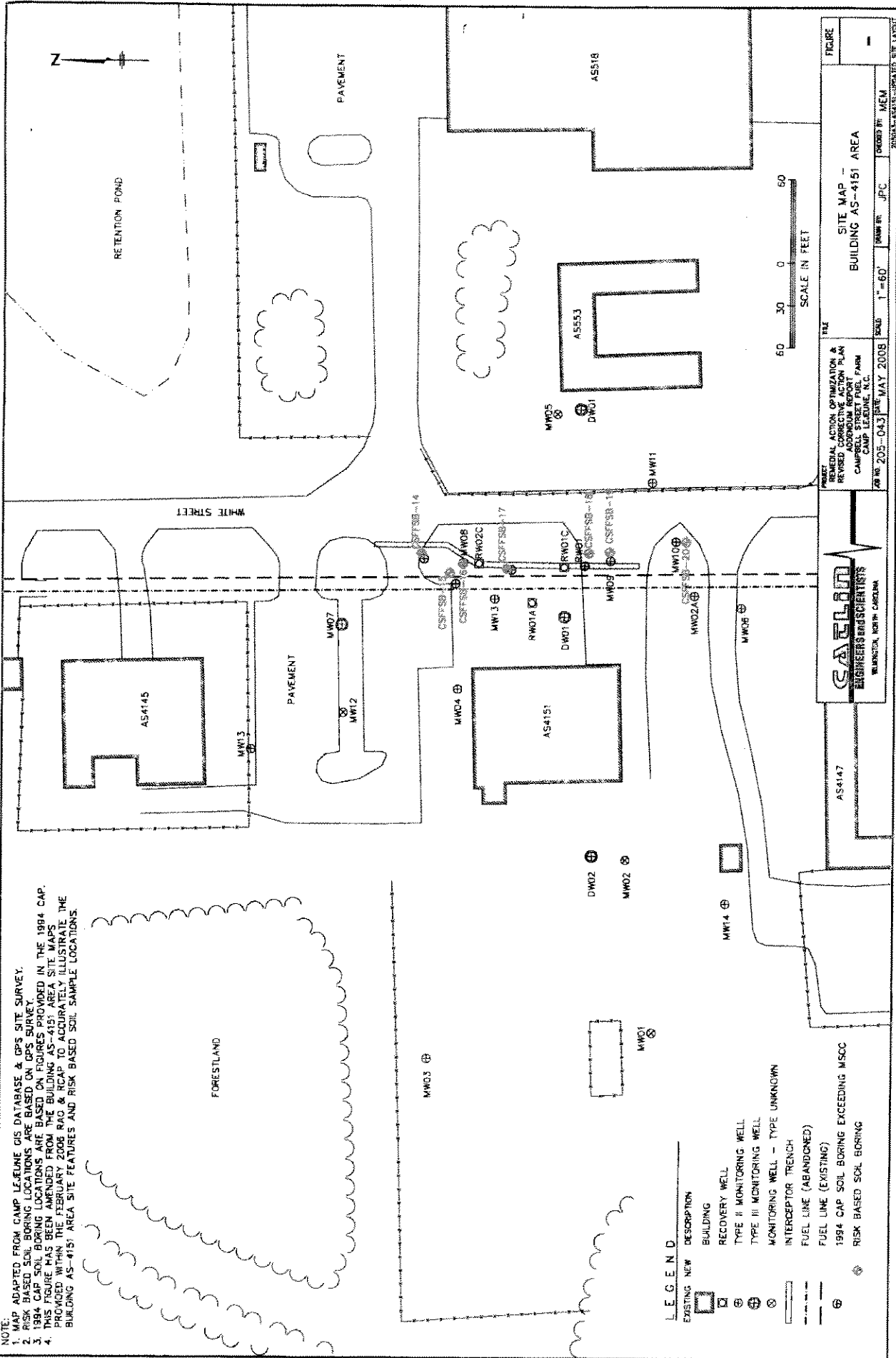


Michael E. Mason, P.E.
Program Manager



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	TRAC	FIGURE
PERMIT	AS4147	---
FEDERAL ACTION OPERATIONS & REVISED CORRECTIVE ACTION PLAN CAMPBELL STREET FUEL FARM CAMP LEJUNE, N.C. JOB NO. 205-043 DATE: MAY 2008 SCALE: 1"=60' DRAWN BY: JFC CHECKED BY: MEM		
SITE MAP - BUILDING AS-4151 AREA		





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

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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

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

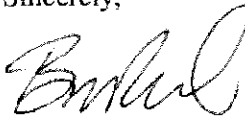
7
The file shows that excavation was recommended as far back as 1992 and was the listed remedy in the Corrective Action Plan (CAP) received on December 14, 1994. The Division has learned that DESC has never approved funding for the removal of the old fuel line or the contaminated soil that was found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

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 17, 2006

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

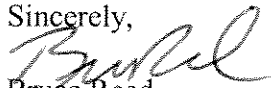
Subject: **Return of Report Entitled**
“Annual Groundwater Monitoring
Monitoring Report 2005-2006
Campbell Street Fuel Farm”
Camp Lejeune, Onslow County

Dear Mr. Smith:

Thank you for submitting the subject report to the Division on June 30, 2006. The Division has reviewed the report and is returning it to you at this time due to the incorrect laboratory reports present within the report. The lab reports are for soil samples, which were not discussed in the report, and may be for another incident. Groundwater samples were discussed in the report, and the laboratory reports for these groundwater samples were not found within the report. Please resubmit the report when it is in an acceptable fashion.

Also, review of some of the field data sheets indicates that the amount of purge water removed from the well can not be determined, and/or is not indicated. The Chain-of-Custody record indicates that it is not clear when exactly the laboratory received the sample. It is in the best interest of the Base to have a Chain-of-Custody record that clearly indicates the time and date of relinquishment and receipt. You or your consultant may use your own Chain-of-Custody record. I believe that Shaw Environmental already does this. If you have any questions concerning this letter, please contact me at (910) 796-7400.

Sincerely,



Bruce Reed
Hydrogeologist II

cc: WiRO-UST

s:\bruce\smith4141\amr.ret

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

February 28, 2006

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

Subject: Review of Report Entitled
"Remedial Action Optimization and
Revised Corrective Action
Plan Addendum Report"
Campbell Street Fuel Farm
AS-142/143-1
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 February 23, 2006. The recommendations in the report are satisfactory. However, the Division suggests sampling the wells listed on the attached Table 2B, with the exception of 13DW-1 which is already in the gauging plan, since these wells have not been gauged or sampled since 1992 or 1993.

Please note that the Division never specified in its June 28, 2005 letter that the gauging should be done on a monthly basis as indicated on Page 9 of the subject report.

On Page 10 of the report, reference is made to abandoning soil borings with cuttings. Please assure that the soil borings are sufficiently sealed to prevent downward migration of stormwater. The fact that some of the borings were at a fuel farm also presents concern for creating a preferential pathway for any fuel that accidentally may be spilled to move easily downward. If any of these borings penetrated the water table, then the borings must be abandoned in accordance with 15A NCAC 2C.

TABLE 2B
GROUNDWATER SAMPLING HISTORY
BUILDING AS-4151 AREA
CAMPBELL STREET FUEL FARM
REMEDIAL ACTION OPTIMIZATION & CORRECTIVE ACTION PLAN ADDENDUM REPORT
MARINE CORPS AIR STATION, NEW RIVER, NORTH CAROLINA

WELL ID.	DATE INSTALLED	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	LAST DATE ABOVE 2L GWQS
TYPE III MONITORING WELLS																
13DW-1	12/1/1991		X			X	X	X	X	X	X	X	X	X	X	6/22/2005
122DW-1	6/23/1992	X														NON-CONCLUSIVE
122DW-2	6/24/1992	X														NON-CONCLUSIVE
RECOVERY WELLS																
122RW-1	1/31/1993		X													NON-CONCLUSIVE
RWC-1	UNKNOWN															NO DATA
RWC-2	UNKNOWN															NO DATA
4151RW-1	UNKNOWN															NO DATA

1 The information presented within for 1992 to 2002 is based on data obtained from the following reports
 Corrective Action Plan Building AS-4151, MC AS New River, North Carolina, Baker Environmental, Inc. July 29, 1994
 Final Annual Monitoring Report, Campbell Street Fuel Farm, Marine Corps Base Camp Lejeune, North Carolina, Shaw Environmental, Inc. January 2004
 2 2003, 2004 & 2005 data provided by Engineering and Environment, Inc
 3 Last date above 2L GWQS = The last date in which a contaminant of concern was above the 2L GWQS for each monitoring well as determined by others
 4 NO DATA = No sampling records available for these wells
 5 Shading indicates well not located or abandoned Data from these wells is from previously submitted reports
 6 Non-conclusive indicates that well has not been recently sampled. Therefore, current conditions in comparison to the 2L GWQS is not known for the well indicated

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MAR 03 2006

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ACS I&E / IDD / _____ / _____

For: Review / Routing / Signature

Admin 25
Correspondence ID Number: _____ Due Date: _____ / _____ / _____ Interim Review Due Date

Subject: NCDENA - 28 FEB 06 - Report Review Remedial Action Optimization
+ Revised Corrective Action Plans Addendum Report

Comments: Byron Andrew - please take for action
Recommendations in letter, TX
83

Special Mailing Instructions: _____

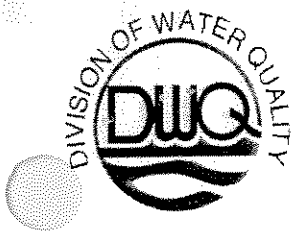
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DIRECTOR INITIALS:	DATE: _____ / _____ / 06
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Andrew # 110 original 3/3/06



Michael F. Easley, Governor

William G. Ross Jr., Secretary
North Carolina Department of Environment and Natural Resources

Alan W. Klimek, P.E. Director
Division of Water Quality

November 3, 2005

Commanding General
Attn: I&E/EMD/EQB
Mr. Andrew Smith
Building 12
PSC Box 20004
MCB Camp Lejeune, North Carolina 28542-0004

Subject: **Review of Soil Contamination Report
Campbell Street Fuel Farm, Camp Lejeune
Onslow County, Incident No. 87537**

Dear Mr. Smith:

On October 4, 2005, the Division of Water Quality (DWQ), Aquifer Protection Section received the subject report. This report was submitted on behalf of the Commanding General, MCB, Camp Lejeune, by Engineering and Environment, Inc. Thank you for this report.

According to the report, approximately 200 gallons of jet fuel was released from a sample port along AST piping. The soil was excavated; however, laboratory results indicated that residual soil contamination remains at three of the sampled areas above DWQ action limits. No soil samples were taken along the northeastern section of the excavated area. No groundwater samples were taken. Additionally, the report indicates that the excavated soils were stockpiled on the site and were not removed.

Due to the confirmed presence of residual contamination in the soils at the site, the Aquifer Protection Section requests that the extent of soil contamination be defined through the procurement of additional soil samples. Subsequent delineation, DWQ recommends that additional soil excavation, to remove remaining soil contamination, be initiated to the extent possible, taking into accounts site specific constraints such as AST piping and concrete pads, buildings, etc. Any stockpiled soils should be removed from the site for disposal at a properly permitted facility or, if the volume is less than 50 yd³, a GW-71 (Certificate of Approval for Disposal) could be submitted for approval of land application of the soil, within 45 days of initial storage.

DWQ also requests that one monitoring well located on the east side (downgradient direction) of the excavated area be installed and sampled for analysis per appropriate methods as outlined in the Groundwater Section Guidelines for Investigation and Remediation of Soil and Groundwater, July 2000, to verify whether or not groundwater contamination in the vicinity of the release has occurred. The Aquifer Protection Section is aware that a number of monitoring wells currently exist at the site; however, the closest well to the source area of the release is 70 feet away in the documented upgradient direction.

Please proceed with the proposed activities. If you have questions, please contact me or Ginny Henderson at 910-796-7215.

Yours very truly,

Charles F. Stehman, Ph.D., P.G.
Environmental Supervisor I

CFS/GMH

cc: WIRO-APS
William Morris, Jr., P.G.

Engineering and Environment, Inc.
824 Gum Branch Road
Jacksonville, NC 28546

Ginny\Campbell Street Fuel Farm SCR Response.nov2005

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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
Dexter R. Matthews, Director

June 28, 2005

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

Subject: Review of Report Entitled
"Remedial Action Optimization and
Revised Corrective Action Plan"
Campbell Street Fuel Farm
AS-142/143-1
Campbell and White Streets
Camp Lejeune, Onslow County
Incident No. 23297
Intermediate Risk Classification

Dear Mr. Smith:

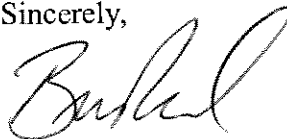
Thank you for submitting the subject report to the Division on May 16, 2005. The recommendations in the report are satisfactory, and the Base is free to conduct any of the work referenced in the report. However, the Division's review of the report, site conditions, and recent gauging results, concluded that it appears that the UST incidents in this area present no significant risk to human health or the environment (low-risk site per 15A NCAC 2L .0115), and that some of the recommended actions in the report may not be necessary. The Division recommends that the last remaining operational leg of the treatment system, at AS-142/AS-143, be shut-down immediately, and gauging activities are recommended for a period of one year to check for any rebound that may occur in this area. All sorbents should be removed from all wells including those around AS-4151, and the wells gauged for a period of one year. If any product is detected over 1/8 inch at either site, then please resume product recovery. At the conclusion of this time period, a monitoring report should be submitted to the Division documenting the gauging events. The incidents will remain intermediate risk until the absence of free-product is documented once the treatment system is turned-off, and the socks are removed. The dissolved groundwater testing is optional.

127 Cardinal Drive, Wilmington, North Carolina 28405

Phone: 910-796-7215 / Fax: 910-350-2004 / Internet: www.enr.state.nc.us

The soil testing referenced in the subject report is due by November 18, 2005. If you have any questions concerning this letter, please contact me at (910) 796-7426.

Sincerely,



Bruce Reed
Hydrogeologist II

cc: WiRO-UST

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