


Office Memorandum
1/27/05
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4/2005



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 25, 2005

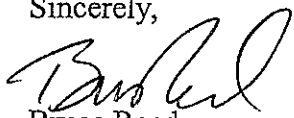
Commanding General
Attn: I & E/EMD/EQB (Ms. Nikki Hall, Bldg.12)
PSC Box 20004
MCB Camp Lejeune, NC 28542-0004

Subject: Review of Soil Removal Actions
Report
USMC-Camp Lejeune, PP-3326,
PP-3330, PP-3332, PP-3350,
and M-230-1,2
Jacksonville, Onslow County
Low Risk Classifications

Dear Ms. Hall:

The Underground Storage Tank (UST) Section has reviewed the Soil Removal Actions Report received on February 18, 2005. Your proposal to remove more contaminated soil is acceptable at this time. Please submit a schedule for the re-excavations. As discussed in the February 24, 2005 meeting, please submit your proposal to address the remaining soil contamination at the M-230 site. The proposal is due by April 26, 2005.

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

Sincerely,

Bruce Reed
Hydrogeologist II

cc: George O'Daniel (Onslow County Health Department)
WiRO-UST bruce/hallppsoilrmvlactn.feb

READ FILE



UNITED STATES MARINE CORPS

MARINE CORPS BASE

PSC Box 20004

Camp Lejeune, North Carolina 28542-0004

In reply refer to:

6287

BEMD

05 JUN 2003

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:

You should have received a Soil Assessment Report for PP-3330 (incident 24010) and the results of additional soil sampling at former underground storage tank (UST) sites PP-3343 (incident 24013), PP-3354 (incident 24015), and PP-3358 (incident 24016) from Catlin Engineers and Scientists (Catlin). All sites are located in the Paradise Point Housing Area aboard Marine Corps Base Camp Lejeune, North Carolina. A brief summary of each report is included below:

PP-3330: A 285-gallon heating oil UST was removed on September 13, 2001. Soil samples taken from the sidewalls after tank closure indicated the presence of C₉-C₂₂ aromatic compounds and 2-Methylnaphthalene above Residential Maximum Soil Contaminant Concentrations (MSCCs). Subsequently, a Limited Site Assessment determined groundwater contamination was below Gross Contaminant Levels. This soil assessment report was prepared in response to a Notice of Regulatory Requirements dated January 9, 2003.

Additional sampling occurred in March 2003. Laboratory tests did not indicate the presence of VOCs, semi-VOCs, VPH, or EPH compounds above the laboratory PQLs. Catlin concluded that previous soil samples were not representative of vadose zone soils due to seasonal high water tables. However, Catlin recommends excavation to remove reasonably contaminated soils adjacent to the sidewalls of the former tank basin.

PP-3343, 3354, and 3358: Three 285-gallon heating oil tanks were removed in September 2001. Soil samples taken after the

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

April 3, 2003

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

Subject: Time Extension
USMC-Camp Lejeune, PP Sites:
3330, 3343, 3354, 3358
Camp Lejeune, Onslow County

Dear Ms. Hall:

The Division has reviewed the subject time extension request that was received by this office today. The extensions are granted. If the reports are not received by the new due date (May 30, 2003), fines and penalties may be assessed from the original due date.

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

Sincerely,

Bruce Reed
Hydrogeologist II

Attachment

cc: WiRO-UST

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READ FILE



UNITED STATES MARINE CORPS
MARINE CORPS BASE
PSC Box 20004
Camp Lejeune, North Carolina 28542-0004

In reply refer to:
6287
BEMD

31 MAR 2003

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:

At the Underground Storage Tank (UST) Partnering Meeting on March 5, 2003, you were informed that several reports would be delayed due to additional sampling needs and funding issues. Camp Lejeune would like to formally request a time extension for the following reports:

UST Site	Report	NORR Date	Proposed Due Date
PP-3330	Soil Assessment Report	01/09/03	5/30/03
PP-3343	Soil Assessment Report	01/09/03	5/30/03
PP-3354	Soil Assessment Report	01/10/03	5/30/03
PP-3358	Soil Assessment Report	01/09/03	5/30/03

Fieldwork at these sites has been scheduled for April 2003. If you have 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

Copy to:
NAVFACENCOM (Ms. Reuther Code EV21LR)
Catlin (Mr. Mike E. Mason)

Faxed 12/14/02

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

mail



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

January 9, 2003

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

BKM/Nikki
Please show me a
Soil Assessment Report looks
like. Should we do them
of the USAs? am I missi
something D/R
N 1/9

RE: Notice of Regulatory Requirements
15A NCAC 2L .0115(d)
USMC-Camp Lejeune-Bldg. PP-3330
Camp Lejeune, Onslow County
Incident No. 24010
Low Risk Classification

Dear Ms. Hall:

Information received by this office on February 19, 2002, confirms a release or discharge from a petroleum underground storage tank (UST) system at the above-referenced site. Records indicate that the USMC is the owner and/or operator of this UST 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).

The risk-based rule for petroleum USTs, 15A NCAC 2L .0115(d), states that the department shall classify the risk of each known discharge or release from the UST system. A review of the November 29, 2002 Limited Site Assessment Report that the USMC has provided to this office indicates that:

- (1) Based upon a review of site-specific information, limited assessment or interim corrective action, the discharge or release poses no significant risk to human health or the environment.

Based on the conditions above, the discharge or release at the subject site has been re-classified as "low risk." In addition, the land use at the site has been classified as residential. Please note that 15A NCAC 2L .0115(e) requires the USMC to notify the Department of any changes that might affect the risk or land use classifications that have been assigned.

Ms. Nikki Hall
January 9, 2003
Page 2

Based on the determination that the risk posed by the discharge or release at the subject site is low, the USMC must comply with the soil assessment and cleanup requirements of 15A NCAC 2L .0115(i). To achieve compliance with this rule, please submit a Soil Assessment Report documenting the vertical and horizontal extent of soil contamination. If soil contamination is present at concentrations exceeding the applicable cleanup levels, the Soil Assessment Report must contain a plan and schedule for soil remediation. The Soil Assessment Report must be received by this office within **90 days** of the date of receipt of this notice. A responsible party who submits a Soil Assessment Report that proposes to remediate or leave in-place soil contamination exceeding the residential or soil-to-groundwater maximum contaminant concentrations established in 15A NCAC 2L .0115(m), whichever are lower, must provide public notice as specified in 15A NCAC 2L.0115(j).

Once soil contamination is remediated, the USMC is required to submit a Soil Cleanup Report with Site Closure Request. This report shall demonstrate that soil contamination was remediated to the residential maximum soil contaminant concentrations established in 15A NCAC .0115(m). A time frame for submittal of a Soil Cleanup Report with Site Closure Request must be specified in the plan and schedule for soil remediation contained in the Soil Assessment Report.

Please refer to the most recent version of the UST Section guidelines for assessment and corrective action for further information on assessment, cleanup, public notification and reporting requirements. The guidelines are available on the Internet at <http://ust.enr.state.nc.us> or may be purchased from the UST Section for a fee of \$8.50. To purchase a copy of the guidelines, please send a check made payable to DENR to:

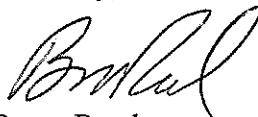
DENR/DWM/UST Section
1637 Mail Service Center
Raleigh, NC 27626-0616

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.

Also 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 Wilmington Regional Office at the letterhead address and/or at 910-395-3900. If there are any questions regarding trust fund eligibility or reimbursement, please contact the UST Section Trust Fund Branch in Raleigh at (919) 733-8486.

Sincerely,



Bruce Reed
Hydrogeologist II

cc: WIRO-UST
s:\bruce\hall3330.sar

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



May 30, 2002

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

Subject: Time Extensions
USMC-Camp Lejeune, Bldgs. TT: 779,
2302, 2254, 2258, 3140, 3165, 3233, 3524,
3548, PP: 3311, 3322, 3326, 3330, 3332,
3340, 3343, 3350, 3354, 3358, and 3363
Camp Lejeune, Onslow County

Dear Ms. Hall:

The Division has reviewed the subject time extension requests that were received by this office on May 29, 2002. The extensions are granted. If the reports are not received by the new due date, fines and penalties may be assessed from the original due date.

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

Sincerely,

Bruce Reed
Hydrogeologist II

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
Dexter R. Matthews, Director



February 22, 2002

Ms. Nikki Hall
Attn: Director, I&E/EMD/EQB
Marine Corps Base
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. PP-3330
Camp Lejeune, Onslow County, N.C.
Risk: Unconfirmed
Incident No. Pending

Dear Ms. Hall:

Information received by this office on February 19, 2002, 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 July 2001 UST Section Guidelines for Assessment and Corrective Action. The Guidelines are available on the Internet at <http://ust.enr.state.nc.us> or may be purchased from the UST Section for a fee of \$8.50. 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 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.

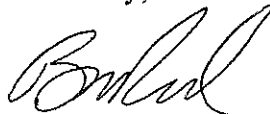
Ms. Nikki Hall
February 22, 2002
Page 3

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

s:\bruce\hall3330.feb