



North Carolina Department of Environment and Natural Resources

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

Division of Waste Management
Underground Storage Tank Section

Dexter R. Matthews, Director

July 15, 2008

Commanding Officer
I&E/EMD (Attn: Mr. John Townson, Bldg. 1)
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

Re: Your Response to June 2, 2008 Notice of Violation
Risk-based Assessment and Corrective Action for
Petroleum Underground Storage Tanks
USMC-Camp Lejeune-MCAS, AS-4141
White Street
Camp Lejeune, Onslow County
Incident Number: 3218
Risk Classification: Intermediate
Ranking: I155D

Dear Mr. Townson:

Thank you for your response to the recent Notice of Violation letter concerning implementation and operation of the corrective action plan/system that was approved by the Division on April 19, 2007. The Division has reviewed this letter, and the information received by Mr. Brynn Ashton of Camp Lejeune. Below are comments and concerns related to this situation:

- Our guidance document, Guidelines for Assessment and Corrective Action, provides a recommended format for preparation and submittal of Corrective Action Plans, as well as guidance for other reports and issues relating to the rules and regulations regarding UST contamination incidents. On Page B-43, under the section entitled "Schedule," a detailed schedule is required. This detailed schedule is required for every responsible party of an UST incident. In fact, we went through the same issue when the Revised Corrective Action plan was approved for the Hadnot Point Fuel Farm/Building 1115 incident. Your staff ultimately provided specific deadlines for each incident, even though they were not present in the original documents. One response was on letterhead, and one response was electronically communicated to the Division. The Division considers either one an appropriate response to the requirement of providing a specific schedule. We trust that you understand why the Division requires specific dates for reaching certain milestones in regard to assessment and cleanup of UST contamination problems.
- The Division understands that Camp Lejeune may occasionally have funding issues for performing certain tasks, and the Division has worked with your staff on numerous occasions in regard to this issue. In this case, a time-extension request justifying why Camp Lejeune could not meet the specific deadline was not received prior to the due date. The deadline of April 11, 2008, was understood by your staff as referenced in an email correspondence from Base EMD staff dated October 11, 2007, copy attached.

Your office has advised that the AS-4141 treatment system can be operating by December 31, 2008. At this time, the Division will hold enforcement in abeyance until this date with the condition that free-product recovery continues at this site.

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

Sincerely,



Bruce Reed
Hydrogeologist II
Wilmington Regional Office

Attachment

cc: Brynn Ashton, Camp Lejeune
George O'Daniel, Onslow County Health Department
Michael E. Mason, Catlin Engineers and Scientists
Grover Nicholson
WiRO-UST

UST Regional Offices

Asheville (ARO) – 2090 US Highway 70, Swannanoa, NC 28778 **(828) 296-4500**
Fayetteville (FAY) – 225 Green Street, Suite 714, Systel Building, Fayetteville, NC 28301 **(910) 433-3300**
Mooreville (MOR) – 610 East Center Avenue, Suite 301, Mooreville, NC 28115 **(704) 663-1699**
Raleigh (RRO) – 1628 Mail Service Center, Raleigh, NC 27699 **(919) 791-4200**
Washington (WAS) – 943 Washington Square Mall, Washington, NC 27889 **(252) 946-6481**
Wilmington (WIL) – 127 Cardinal Drive Extension, Wilmington, NC 28405 **(910) 796-7215**
Winston-Salem (WS) – 585 Waughtown Street, Winston-Salem, NC 27107 **(336) 771-5000**
Guilford County Environmental Health, 1203 Maple Street, Greensboro, NC 27405, **(336) 641-3771**

Bruce/townsonas4141resp1

Subject: AS-4141 Dual Phase Extraction System
From: "Arnold GS09 Johanna E" <johanna.arnold@usmc.mil>
Date: Thu, 11 Oct 2007 12:53:46 -0400
To: "Bruce Reed" <Bruce.Reed@ncmail.net>
CC: "Oros, Dan J CIV Navfac MIDLANT, NC IPT" <dan.oros@navy.mil>, <mike.e.mason@catlinusa.com>, "Smith GS12 Andrew" <stephen.a.smith2@usmc.mil>

Bruce,

The design completion date for the Dual Phase Extraction System at AS-4141 was delayed due to the following fact:

During a site visit to AS-4141 last week it became apparent that a more desirable and efficient location for this skid-mounted system should be considered. The proposed new location would be closer to the contaminant Plume and would not require the trenching of new lines and possible relocation of existing utilities.

We are currently in the process of coordinating the change in location with personnel at Marine Corps Air Station New River. Since the new location may require a modification to the design of the system the project is on hold.

We are aware that the due date for start-up of the Dual Phase Extraction System is April 11, 2008.

V/R Johanna Arnold

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

JUL 17 2008

Marine Corps Base Camp Lejeune
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FROM: DIRECTOR

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SUBJECT: RESPONSE TO 2 JUNE NOV

COMMENTS:

*Bryan / Scott / Johnson - as previously assigned (CTS #656)
please make CST Remediation data base is updated and
maintained so we avoid this sort of error in future.
JT*

ROUTING: Originator: J LEDFORD Initials: JCL Date: 7/16/2008

1. J TOWNSON Initials: *JT* Date: 7/16/08

2. Initials: Date:

3. Initials: Date:

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JOHANNA SCOTT - 7/17/08

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JUL 17 2008

**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 2, 2008

Commanding Officer
Attn: I&E/EMD/EQB, Dr. Johanna Arnold-
UST Program Mgr., Bldg. 12
PSC Box 20004
MCB Camp Lejeune, NC 28542-0004

Subject: Review of Annual Monitoring
Report
USMC Camp Lejeune Bldg AS-4141
White Street (MCAS)
Camp Lejeune, Onslow County
Incident No. 3218
Risk: Intermediate (I155D)

Dear Dr. Arnold:

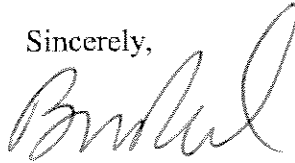
Thank you for submitting the subject report to this office on June 19, 2008. The UST Section has reviewed this report and offers the following comments:

- It should be important to note that contaminated soil is above residential levels. Please see the Division's June 29, 2006 letter of review for the RAO/RCAP Addendum. The subject report (2008 AMR) suggests that soil contaminant levels are below residential and industrial commercial levels.
- On Page 2-4, reference is made twice to gasoline being the product recovered at this site. Historically, JP-5 has been the reported product released at this incident site. Please clarify if gasoline has indeed been found in the subsurface at this site.
- Pursuant to the last sentence of the first paragraph found on Page 4-2, please remove product before placing an absorbent socks in the wells.

- It was recommended in the report to perform semi-annual groundwater collection for dissolved constituents. The Division communicated to Mr. Andrew Smith on July 5, 2007, that semi-annual dissolved constituent sampling could go to annual.

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\arnold4141amr08

Marine Corps Base Camp Lejeune
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SUBJECT: REVIEW OF ANNUAL MONITORING REPORT

AS-4141

COMMENTS:

Bryant / Scott / Johnson - fyi + action.
JMT

ROUTING: Originator: J LEDFORD Initials: JCL Date: 7/8/2008
1. J TOWNSON Initials: JMT Date: 7/8/08
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3. Initials: Date:

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North Carolina Department of Environment and Natural Resources

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

Division of Waste Management
Underground Storage Tank Section

Dexter R. Matthews, Director

June 2, 2008

CERTIFIED MAIL 7004 2510 0001 8279 6839
RETURN RECEIPT REQUESTED

Commanding Officer
I&E/EMD/EQB (Attn: Mr. John Townson, Bldg. 1)
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

Re: Notice of Violation of 15A NCAC 2L .0400
Risk-based Assessment and Corrective Action for
Petroleum Underground Storage Tanks

USMC-Camp Lejeune-MCAS, AS-4141
White Street
Camp Lejeune, Onslow County
Incident Number: 3218
Risk Classification: Intermediate
Ranking: I155D

Dear Mr. Townson:

Information received by this office on June 27, 1986 confirms a release or discharge from a petroleum underground storage tank (UST) system at the above-referenced location. Records indicate that Camp Lejeune is the owner or operator of this UST system. This letter explains the violation(s) and associated corrective action(s) it must take as a result of the release or discharge in accordance with North Carolina statutes and rules. The Division of Waste Management, UST Section 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).

VIOLATION 1:

Failure to implement the Corrective Action Plan and schedule, which were approved by the UST Section on April 19, 2007, in accordance with Title 15A NCAC 2L .0407(c), by April 11, 2008, as specified in the Corrective Action Plan and schedule.

REQUIRED CORRECTIVE ACTION:

Based on the determination that the risk posed by the discharge or release at the subject site is intermediate, Camp Lejeune must comply with cleanup requirements pursuant to Title 15A NCAC 2L .0407(c). Please implement the Corrective Action Plan and schedule in accordance with Title 15A NCAC 2N .0707, Title 15A NCAC 2L .0106(h), and the most recent version of the *UST Section Guidelines for Assessment and Corrective Action*. The Corrective Action Plan must be implemented within 45 days of the date of receipt of this notice. A responsible party who submits a Corrective Action Plan that proposes natural attenuation must provide public notice as specified in Title 15A NCAC 2L .0409(a).

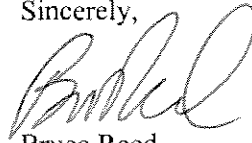
Please take the corrective action(s) for the above violation(s) as necessary to bring the site into compliance. Corrective actions must be taken and reported to the Wilmington Regional Office, within 30 days from the date of this notice, unless otherwise noted in the above corrective actions, to avoid recommendation of civil penalties for continuing violations.

Penalties may be assessed for the violation(s) described within this Notice of Violation. Your 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 additional 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.

Please note that performing assessment and cleanup work that is not required under 15A NCAC 2L .0400 is not reimbursable from the Commercial or Noncommercial Leaking Petroleum Underground Storage Tank Cleanup Funds.

If you have any questions regarding the actions that must be taken or the rules mentioned in this letter, please contact me at the address or telephone number listed below. If you have any questions regarding trust fund eligibility or reimbursement, please contact the UST Section Trust Fund Branch at (919) 733-8486.

Sincerely,



Bruce Reed
Hydrogeologist II
Wilmington Regional Office

cc: George O'Daniel, Onslow County Health Department
Michael E. Mason, Catlin Engineers and Scientists
WiRO-UST

UST Regional Offices

Asheville (ARO) – 2090 US Highway 70, Swannanoa, NC 28778 (828) 296-4500

Fayetteville (FAY) – 225 Green Street, Suite 714, Systel Building, Fayetteville, NC 28301 (910) 433-3300

Mooresville (MOR) – 610 East Center Avenue, Suite 301, Mooresville, NC 28115 (704) 663-1699

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Washington (WAS) – 943 Washington Square Mall, Washington, NC 27889 (252) 946-6481

Wilmington (WIL) – 127 Cardinal Drive Extension, Wilmington, NC 28405 (910) 796-7215

Winston-Salem (WS) – 585 Waughtown Street, Winston-Salem, NC 27107 (336) 771-5000

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Bruce/townsonas4141

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SUBJECT: NOTICE OF VIOLATION OF 15A NCAC 2L .0400 RISK-BASED ASSESSMENT AND CORRECTIVE ACTION FOR PETROLEUM UNDERGROUND STORAGE TANKS

COMMENTS:

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2. Initials: Date:
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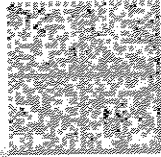
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Commanding Officer
I & E/EMD/EOB
(Attn: Mr. John Townson, Bldg.)
Marine Corps Base
PSC Box 20004
CampLejeune, NC 28542-0004

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

*Commanding Officer
I + E / EMD / EAB
(Attn: John Jamison Bdz.)
Marine Corps Base
PSC Box 2004
Camp Lejeune, NC 28572-
0004*

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Agent
 Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? Yes

If YES, enter delivery address below: No

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2. Article Number

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PS Form 3811, February 2004

Domestic Return Receipt

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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 29, 2006

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

Subject: Review of Report Entitled Remedial
Action Optimization and Revised
Corrective Action Plan Addendum
USMC-Camp Lejeune, AS-4141
Camp Lejeune
Onslow County
Incident No. 3218 & 9529
Risk Ranking: I155D

Dear Mr. Smith:

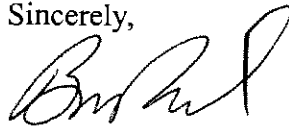
On June 16, 2006, the Underground Storage Tank Section Wilmington Regional Office received the subject report. The Section has reviewed the report and offers the following comments:

- On Page 12 it was suggested that soil contamination was below residential levels. Please note that MADEP carbon ranges exceeded residential levels, as illustrated in other parts of the report.
- Based upon the above information, the Section disagrees with the summary statement provided in Section 4.5.2 of the report.
- In regard to cleanup goals in Section 5.3.1 of the report, please be aware that the correct soil cleanup level for an intermediate risk site is the lower of soil-to-groundwater or residential maximum soil contaminant levels. Please see 15A NCAC 02L.0408(4). Thus, the Section disagrees with the statement in Section 5.4.2. Also, please have your consultant advise how the proposed treatment system will treat the soil contamination to regulatory action levels.

- Please advise how the proposed treatment system will remove product that is apparently under White Street.
- Free-product recovery must continue at this site in accordance with State and Federal regulation.
- Further definition of soil contamination is needed around JP5SB-12.
- The schedule needs to utilize specific dates.
- A preliminary general design and layout of the system needs to be submitted before the Section can approve the report.
- Please submit the laboratory analytical results from well number UST4141-MW15.

Please submit information that addresses the above concerns by August 31, 2006. Any questions should be directed to me at (910) 796-7400.

Sincerely,



Bruce Reed
Hydrogeologist II

cc: WiRO-UST

bruce\smithcom4141.jun