

Smith GS09 Andrew

From: Bruce Reed [Bruce.Reed@ncmail.net]
To: Tuesday, September 20, 2005 1:59 PM
Subject: Smith GS09 Andrew
TT-3548

Hi Andrew:

Pursuant to our conversation yesterday about the subject site, it was confirmed today that the Base would need a LUCAP, or alternate LUCAP (see alternate NRP on website), for the site since soil remains over residential. We would still recommend that the soil be remediated when the building is demolished.

If the soil can be remediated to below residential levels, then the site is eligible for closure w/o a NRP, since the gw tested below standards here recently. As it sits today, the Division understands that the soil remediation will occur when Bldg. 3548/3546 is demolished.

Give me a call if you have any questions,

Bruce

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 12, 2005

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

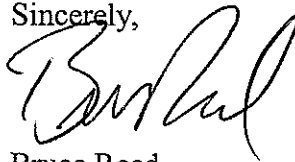
Subject: Review of Soil Assessment Report
USMC-Camp Lejeune, Bldg. TT-3548
Incident No. 23694
Camp Lejeune, Onslow County

Dear Ms. Hall:

The Division has reviewed the subject report that was received by this office on April 11, 2005. The recommendations in the plan are satisfactory. Please note that excavation into the water table at this site may increase the likelihood of achieving 2L standards at a quicker pace. Please perform the required public notice and submit a copy to the Division.

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

Sincerely,



Bruce Reed
Hydrogeologist II

cc: George O'Daniel, Onslow County Health Dept.
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

August 15, 2003

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, TT-3548 & NH-100
Incident No. 23694 and 24416
Camp Lejeune, Onslow County

Dear Ms. Hall:

The Division has reviewed the subject time extension requests that were received by this office yesterday. The extensions are granted. If the reports are not received by the new due dates (May 28, 2004 and February 2, 2004, respectively) fines and penalties may be assessed from the original due dates.

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

Sincerely,

Bruce Reed
Hydrogeologist II

cc: WIRO-UST

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JULYED TO J. CONWAY (UNITED) 7/10/03
MEM 7/16

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 3, 2003

Ms. Nikki Hall
Attention: 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(d)
USMC-Camp Lejeune-Bldg. #TT-3548
Camp Lejeune, Onslow County
Incident No. 23694
Low Risk Classification

Dear Ms. Hall:

Information received by this office on September 6, 2001, 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 May 7, 2003 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

June 3, 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:

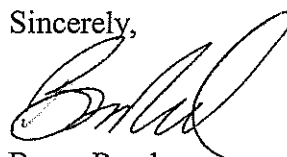
DENR/DWM/UST Section
1637 Mail Service Center
Raleigh, NC 27626-0616

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\hall3548.sar



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

READ FILE

In reply refer to:
6287
BEMD

21 MAY 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:

We are pleased to submit the following reports for your review. Enclosures (1) and (2) are the Phase I Limited Site Assessment Reports for underground storage tank (UST) sites TT-2302/2304 and TT-3546/3548. The sites are located in the Tarawa Terrace II housing area aboard Marine Corps Base, Camp Lejeune, North Carolina. A brief summary of each report is included below:

TT-2302/2304: A 550-gallon heating oil UST was removed July 26, 2001. Soil samples taken, after tank closure, indicated the presence of TPH-DRO, TPH-GRO, C₉-C₂₂ aromatic compounds, naphthalene, 1,2,4 trimethylbenzene and 2-methylnaphthalene above State Action Levels. This Limited Site Assessment was conducted in response to a Notice of Regulatory Requirements dated January 29, 2002.

Additional sampling was performed in July 2002 and March 2003. Laboratory analysis of groundwater samples indicated the presence of naphthalene, 2-methylnaphthalene, C₉-C₁₈ aliphatic and C₉-C₂₂ aromatic compounds above Groundwater Quality Standards but below Gross Contaminant Levels. Naphthalene, 1,2,4-trimethylbenzene, 2-methylnaphthalene, and C₉-C₂₂ aromatic compounds were also detected in the soil sample above Soil to Groundwater MSCCs but below Residential MSCCs. This site meets Residential use criteria and may qualify for Low Risk status.

TT-3546/3548: A 550-gallon heating oil tank was removed August 7, 2001. Soil samples taken, after tank closure, indicated the presence of TPH-DRO, TPH-GRO, C₉-C₂₂ aromatic compounds above State action levels. This Limited Site Assessment was conducted in response to a Notice of Regulatory Requirements dated February 15, 2002.

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, TT:2302, 3548,
3140, PP: 3332, 3326, 3350, FC-40-3,
and 1323-3
Camp Lejeune, Onslow County

Dear Ms. Hall:

The Division has reviewed the subject time extension request that was received by this office on March 26, 2003. The extensions are granted. If the reports are not received by the new due date (see attached), 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,

A handwritten signature in black ink, appearing to read 'Bruce Reed', is positioned above the printed name.

Bruce Reed
Hydrogeologist II

Attachment

cc: WiRO-UST

s:\ust\bruce\halltime2.apr



UNITED STATES MARINE CORPS

MARINE CORPS BASE

PSC Box 20004

Camp Lejeune, North Carolina 28542-0004

In reply refer to:

6287

BEMD

21 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:

On March 5, 2003 a number of items were addressed at the Underground Storage Tank Partnering Meeting, including upcoming work. You were informed that several reports would be delayed due to additional sampling requirements 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
TT-2302	Phase I Limited Site Assessment	01/29/02	5/30/03
TT-3548	Phase I Limited Site Assessment	02/15/02	5/30/03
1323-3	Phase I Limited Site Assessment	12/18/02	6/30/03
FC-40-3	Phase I Limited Site Assessment	12/18/02	6/30/03
PP-3332	Soil Assessment Report	01/06/02	6/30/03
PP-3326	Soil Assessment Report	01/08/02	6/30/03
TT-3140	Soil Assessment Report	01/09/02	6/30/03
PP-3350	Soil Assessment Report	10/16/02	6/30/03

Fieldwork at these sites has been scheduled for mid-March and 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

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

January 13, 2003

Mr. Thomas Burton
Attention: Director, I&E/EMD/EQB
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

Subject: Time Extensions
USMC-Camp Lejeune, TT-2302/2304
and TT-3546/3548
Camp Lejeune, Onslow County

Dear Mr. Burton:

The Division has reviewed the subject time extension requests that were received by this office on January 10, 2003. 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

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

30 DEC 2002

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:

Camp Lejeune would like to formally request a second extension for submission of Phase 1 Limited Site Assessment Reports for Underground Storage Tank (UST) sites TT-2302/2304 and TT-3546/3548 in order to perform additional sampling. Your office requested Phase 1 LSAs for these UST sites through Notices of Regulatory Requirements dated January 29, 2002 and February 15, 2002, respectively. A time extension to December 1, 2002 was granted on May 30, 2002. We propose submitting the required reports to your office no later than February 28, 2003.

At TT-2302/2304, we were unable to retrieve a groundwater sample from beneath the tank pit due to interference from overhead utilities. A groundwater sample was obtained in the vicinity of the tank area and showed contaminants all below applicable levels. However, in order to better represent groundwater immediately beneath the former tank pit and fully characterize the site, we feel an additional groundwater sample is warranted.

At TT-3546/3548, neither soil nor groundwater samples taken during the LSA field effort exceeded applicable MSCCs or NCGWQS and GCLs. One sample taken from the bottom of the excavation (9'bls) during the tank removal in 2001 exceeded the C9-C22 Fraction Residential MSCC. Because groundwater is well below the depth of this sample (13'bls) and was clean, we would like to further characterize the soils beneath the former test pit. We plan on taking two (2) additional soil samples from 10'-14'bls in the vicinity of the former tank pit area. Through this we hope to provide a clearer understanding of 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



May 30, 2002

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

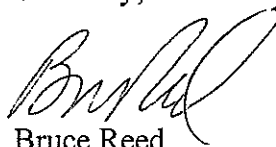
Subject: Time Extensions
USMC-Camp Lejeune, Bldgs. TT: 779,
2302, 2254, 2258, 3140, 3165, 3233, 3524,
3548, PP: 3311, 3322, 3326, 3330, 3332,
3340, 3343, 3350, 3354, 3358, and 3363
Camp Lejeune, Onslow County

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 15, 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. TT-3548
Camp Lejeune, Onslow County, N.C.
Risk: Unconfirmed
Incident No. 23694

Dear Ms. Hall:

Information received by this office on February 14, 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 15, 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

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