Doc. No.: CLEJ-00681-3.01-10/15/90

Environmental
Science &
Engineering, Inc.
A CILCORP Company

October 15, 1990

Ms. Laurie Boucher
Commander, Code 1822, Bldg IAA
Atlantic Division
Naval Facilities Engineering Command
Norfolk, VA 23511-6287

RE: Discharge of drill cuttings and fluids at HPIA, Camp Lejeune
ESE Contract No. 49-02036

Dear Laurie:

As per LANTDIV's direction (letter from C.R. Thompson to Mindy Sayres dated 19 September 1990), the Camp Lejeune HPIA RI/FS Work Plan proposes the discharge of drill cuttings and fluids (e.g. drilling mud) onto the ground in the vicinity of the borehole. My concerns with this practice have been discussed with you (and Sheila Ashton before you) during numerous telephone conversations over the last few months.

As I have counselled, drilling mud is fluid and will, most likely, <u>not</u> be confined to a small area adjacent to the borehole. LANTDIV's request that ESE limit access to these materials by cordoning off the mud with stakes and flagging tape may not be feasible.

ESE management has been appraised of the proposed handling of drill cuttings and fluids at Hadnot Point. ESE considers the proposed method inconsistent with work practices generally accepted by EPA and state environmental agencies. LANTDIV personnel engaged in operations in the vicinity, in and around, the HPIA investigation areas could be inappropriately placed at risk, especially in known paths of contamination. Generally accepted practices include containerization, characterization and subsequent disposal based on that characterization. Such practices are particularly suitable for HPIA due to the high traffic nature of this area.

ESE suggests that drill cuttings generated at HPIA be placed in clearly marked drums at each well head. Responsibility for characterization and disposal can be determined at a later date.

ESE respectfully requests that LANTDIV duly consider this counsel as it necessitates resolution prior to commencement of the field effort.

201 Route 17 North Rutherford, NJ 07070 Phone (201) 896-0363

Formerly known as Hunter Environmental Services, Inc.

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Sincerely,

Mindy Sayres

Mindy Sayres
Project Manager
ESE New Jersey

cc: S. Del Re'-Johnson
R. Gregory
M. Tobin

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