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ARF
CTO-0099

Baker

Baker Environmental, Inc.
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420 Rouser Road
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(412) 269-6000
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May 31, 1996

Commander
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Bldg N-26)
Norfolk, Virginia 23511-2699

Attn: Ms. Katherine Landman
Navy Technical Representative
Code 18232

Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0099
FY97 Site Management Plan
Marine Corps Base, Camp Lejeune, North Carolina

Dear Ms. Landman:

Baker Environmental, Inc. (Baker) is pleased to submit two copies of the draft Fiscal Year (FY) 1997 Site Management Plan for Marine Corps Base (MCB) Camp Lejeune, North Carolina. This document is being submitted in accordance with the final Implementation Plan dated April 3, 1996.

Copies of this document have been submitted to Mr. Neal Paul, IRP Director, MCB Camp Lejeune (two copies), Ms. Gena Townsend, USEPA Region IV (one copy), Mr. Patrick Watters, NC DEHNR (one copy), and Mr. Jim Dunn, OHM Corporation (one copy).

In order to submit the final version of this document by September 1, 1996, comments on the draft are due by July 31, 1996.

Baker appreciates the opportunity to serve LANTDIV on this project. If you have any questions or comments, please do not hesitate to contact me at (412) 269-2053.

Sincerely,

BAKER ENVIRONMENTAL, INC.

Matthew D. Bartman

Matthew D. Bartman
Activity Coordinator

MDB/lq

Attachments

cc: Ms. Beth Collier, Code 02115 (w/o Attachments)
Ms. Lee Anne Rapp, P.E., Code 18312 (w/o Attachment)
Mr. Neal Paul, IRP Director, MCB Camp Lejeune (two copies)

07.01 - 07/17/96-01790
Admin Rec

Baker

Baker Environmental, Inc.
Airport Office Park, Building 3
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(412) 269-6000
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July 17, 1996

Commander
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

Attn: Ms. Katherine Landman
Navy Technical Representative
Code 18232

Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0001
MCB Camp Lejeune, North Carolina
Partnering Minutes - May 1996

Dear Ms. Landman:

Attached are the final meeting minutes from the Partnering meeting held on May 7 and 8, 1996 at Baker's offices in Pittsburgh, Pennsylvania. A copy of these meeting minutes has been forwarded to all of the Team members. These meeting minutes were finalized at the Partnering meeting held on July 10 and 11, 1996.

If you have any questions, please do not hesitate to contact me at (412) 269-2053.

Sincerely,

BAKER ENVIRONMENTAL, INC.

Matthew D Bartman

Matthew D. Bartman
Activity Coordinator

MDB/lq

Attachments

cc: Ms. Linda Saksvig, P.E., Code 18231
Mr. Byron Brant, Code 1832
Mr. Neal Paul, MCB Camp Lejeune
Mr. Patrick Watters, NCDEHNR
Ms. Gena Townsend, EPA Region IV
Mr. Jim Dunn, OHM
Lt. Cheryl Hansen, ROICC MCB Camp Lejeune
Ms. Lee Anne Rapp, P.E., Code 18312 (w/o attachment)
Ms. Beth Collier, Code 02115 (w/o attachment)

MEETING MINUTES
MCB CAMP LEJEUNE PARTNERING TEAM
May 7-8, 1996

A Partnering Meeting was conducted on May 7 and 8, 1996 between representatives from LANTDIV, MCB Camp Lejeune, Baker Environmental, Inc. (Baker), and OHM Remediation Services, Inc. (OHM). The meeting was attended by the following:

- Ms. Katherine Landman, LANTDIV
- Mr. Neal Paul, MCB Camp Lejeune
- Mr. Matt Bartman, Baker
- Mr. Richard Bonelli, Baker
- Mr. Jim Dunn, OHM
- Gena Townsend, EPA Region IV

The meeting was hosted and chaired by Matt Bartman. Additionally, Matt Bartman recorded the minutes. Mr. Patrick Watters was unable to attend the meeting due to scheduling conflicts. Additionally, Ms. Kelly Dreyer from Marine Corps Headquarters attended the meeting as a guest.

The minutes are summarized below for each day of the meeting and by topic.

May 7, 1996

The meeting focused on the following items:

- Deliverable to USEPA during the Olympics
- WEB Site for Camp Lejeune
- RAB Update
- NC Wilmington Visit to Site 69
- Document Review Dates
- IR Conference Update
- Marine Corps Update
- Liquid IDW Disposal
- Fence Removal
- Site 80 TCRA
- GIS/BRAGS
- OU No.1 Wells
- FY97 SMP

May 8, 1996

- Site 35 Supplemental Groundwater Investigation Findings
- Site 89 and 93 Field Investigation
- Site 82 Pump and Treat
- Long Term Monitoring
- SI Reports

The first day of meetings began with the traditional check in and review of the minutes from the previous meeting. Neal provided comments to the minutes. The revisions will be made and the minutes from the March Partnering Meeting will be finalized and sent to all the team members.

USEPA Deliverables

Gena informed the Team that due to the Olympics the USEPA office in Atlanta will be closed or operating with limited staff from July 15 to August 4, 1996. Gena would like all deliverables sent directly to her private residence. Gena is planning on moving and will need to supply the Team with her new address. Gena will supply the address of other individuals who are involved in the review process. For any draft RODs that will be submitted at this time, Gena will provide the address of the USEPA attorney that will be reviewing the document.

Gena mentioned that if the draft Treatability Study for Site 69 is submitted at this time it will need to be mailed to her and the USEPA reviewers. Gena will supply the Team with the appropriate addresses.

A short discussion regarding document submittals followed and Neal explained that he requires that only seven final RODs be sent to him for signature.

WEB Site

Matt explained to the Team that Baker is looking into creating an external corporate WEB site on the Internet. Matt would like to use the WEB site as a vehicle to broadcast the successes that the Team has achieved in the environmental investigation and cleanup of Camp Lejeune. Matt explained that the only thing limiting the establishment is funding. Matt wanted to clear the release of information with the Team. Neal said that he would need to speak with Public Affairs to see if there would be any problem with releasing information in this forum and what type of information should be released.

RAB Update

Neal informed the Team that the RAB meeting is still scheduled for June 5, 1996 in Jacksonville, NC. Neal provided an agenda for the Team members to review and comment on. Neal informed the Team that the EMD would be conducting a base tour on May 29, 1996. Matt informed Neal that, if needed, someone from Baker could participate in the tour to assist EMD personnel in discussing the sites.

NC Wilmington Visit to Site 69

Matt proposed that because the RAB meeting is scheduled for the evening of June 5, 1996 it may be beneficial to ask representatives from the Regional office of NC DEHNR to visit Site 69and discuss the Treatability Study and findings to date afterward.

Neal said that he would talk to Patrick and get his thoughts on inviting representatives from the regional office in Wilmington to Camp Lejeune. However, Neal expressed that if we invite these representatives to Camp Lejeune we must have something to discuss other than wells in the woods. Matt stated that he would speak with Gordon Ruggaber to see what information would be available for discussion. If the Team did not feel this information was sufficient the invitation would be postponed until more information could be obtained.

Document Review Dates

Matt has begun keeping track of the deliverables sent from Baker to the regulators and the dates that comments are requested. Matt stated that he will supply a copy of this database to members of the Team on a weekly or biweekly basis. This will allow Team members to keep track of when their comments are due and inform LANTDIV or Baker when comments will be late. This process will assist Baker in scheduling personnel for future document submittals.

IR Conference Update

Neal and Kelly discussed several topics that were addressed at the conference. Neal informed the Team about groundwater modeling that has been completed for other facilities and would like to see this conducted for Camp Lejeune sites. The EMD at Camp Lejeune is preparing a Scope of Work for Baker to review and begin to examine costs for doing groundwater modeling for IR and UST sites that undergoing active groundwater remediation.

Neal also discussed Camp Lejeune RCRA status. Neal stated that 340 SWMUs have been identified at Camp Lejeune and 80 of these 340 will require some additional investigation. Paul Rakowski is interested in setting up a meeting with Grover Cleveland to discuss handling the RCRA investigations using the CERCLA process. Neal stated that the NC DEHNR RCRA may have a problem seeing CERCLA verbiage and CERCLA deliverables applied to RCRA. Neal expects to have the permit by September and has been told by Paul Rakowski that contracts would be ready to begin investigations in September. Neal mentioned that Baker would be tasked with the investigations and OHM would be tasked with any removal or construction. Gena suggested

that Master Project Plans be developed for dealing with all of the SWMUs. Kate stated that Patrick hopes to keep this matter under the CERCLA process. Neal stated that he would inquire about meeting with Paul Rakowski and the state. He would like to have decisions before Patrick resigns to attend school.

Marine Corps Update

Kelly Dreyer provided the Team with information regarding Marine Corps matters. She stated that the higher levels in the DoD are examining the Partnering process to determine the value added. Kelly informed the Team that the West Coast has been more active in acknowledging their successes. Kelly stated that it may be a good idea for our Team to produce a point paper maybe twice a year in order to document the success we have obtained and the cost savings these success have generated.

Kelly discussed the Keystone Committee who published a report documenting fourteen points for getting to cleanup faster. The key point in this report is that DoD, DoE, and Federal and State regulators are able to come to consensus faster. Kelly also stated that the Asst. Secretary of the Navy will be issuing DoN policy 95-04 which will be a directive for running the IR Program. She stated that DoD will be issuing new guidance for IR Program policy.

Kelly also discussed devolvement. Kelly explained that Congress appropriates dollars to DERA. DoD distributes dollars to EFD then to the Activity. Devolvement would remove DoD from the loop. However, Congress denied the request for FY97. DoD will disseminate $1.4 billion for FY97.

Kelly discussed that DoD has targets to meet relative risks by a certain date and that all programs are to be closed out by FY20. In order to accomplish this task there will be new guidance being implemented.

Liquid IDW

Matt discussed that the disposal of all liquid IDW should be handled at the Site 82 Pump and Treat Plant. The design of the system can easily handle the amount of liquid IDW generated during a typical remedial investigation. Jim stated that this would not be a problem as long as the IDW did not contain any oil and grease contamination. This plant was not designed with an oil water separator and is not equipped to handle this type of waste.

Matt informed Jim that liquid IDW is analyzed in order to properly characterize it for disposal.

Neal stated that all coordination of IDW disposal at the Treatment Plant should be handled through his office. He will be responsible for contacting the ROICC in order to obtain concurrence for OHM to operate the plant for this purpose.

Matt stated that he would like to handle the IDW generated during the investigations at Sites 35, 69, and 73 during the week of May 13th in order to avoid paying an additional months rental on the tankers.

Fence Removal

Neal informed the Team that Colonel Morris from Base Security contacted him about removing the fences at Sites 74, 44, and 82. Neal asked for direction as to whether these fences could be removed. Additionally, Neal also stated that he had to convince Colonel Morris regarding the restrictions for Site 41.

Kate stated that the ROD for Site 44 has not been signed. Rich indicated that due to the elevated volatiles in Edwards Creek it may be important to keep the fence at Site 44 erect even thought it does not prevent access to Edwards Creek.

As for Site 74, Kate stated that the ROD has been signed. Matt checked with Ray Wattras who indicated that in accordance with the ROD, the fence was not required as part of the Institutional Control alternative.

Kate and Neal discussed that the fence removal would be handled by LANTDIV and Kate stated that it should as part of construction.

The Team discussed the signs that are to be used at Site 41. Neal wanted the words "No Hunting" added to the signs. Jim stated that there are to be 40 signs placed around the site and the size and color of the signs will be different than any other signs on the base.

Site 80

Jim provided the Team with Figures indicating what the initial area of soil removal was thought to be versus the actual area that has been delineated. The figures indicated that the area of pesticide contamination above the RLs has increased in the trailer area and in the soil mound area. Jim stated that there are dieldrin levels up to 4,000 ug/kg in the wooded area east of the trailer. Jim stated that the yardage has increased in the surface soil from an estimated 524 yds. to 1225 yds. which is approximately 1900 tons. If the area next to the trailer requires soil removal, it will require clearing and shrubbing. Jim stated that there is approximately 10-14 inches of humus material before you get to native soil.

Gena wanted to know if there are additional funds available if removal of this soil is deemed necessary. Kate stated that it could be taken from the Site 35 design work. Matt stated that before this is done, and money is taken away from a higher priority site, we should exam the RL and determine if a revision is possible so that less soil will be required to be removed. This examination is necessary because pesticides are a basewide problem and are found at varying concentration all over the base.

The Team agreed to allow Matt to reevaluate the RL and statistically evaluate a baseline concentration for pesticides. Matt will discuss the levels with the Team and request Patrick and Gena to approve the use of the revised RL. A conference call will be set up by Matt and Jim once these levels are determined. This information will be provided to Patrick prior to the call in order to inform him about the issues concerning the removal action.

GIS/BRAGS

Rich requested that two guests, Matt Sanfillipo and Dan Fischer, from Baker participate in this portion of the meeting.

Jim provided Dan with comments on the Draft BRAGS report submitted by Baker. These comments were generated by OHM and pertain to the model based on the Site 82 pump test. Jim stated that he would formally submit these comments to Baker. Dan stated that he would review the comments and incorporate any necessary responses into the final submittal.

Matt Sanfillipo provided the Team with information pertaining to the GIS system and how it can be applied to the future of Camp Lejeune environmental affairs. After Matt's discussion Neal felt that it would be necessary to set up a meeting with himself, Brent Rowse, and Lynn Phillips of the Activity.

OU No. 1 Wells

As a follow up to the Wilmington meeting with NC DEHNR, Neal provided information on the supply wells in the Hadnot Point area. Neal stated that supply well HP642 is the only active well and that he does not plan on recommending that this well be abandoned. Historical contamination has only indicated low levels of naphthalene and there is no rationale to inactivate and abandon this well.

Kate mentioned that we should look into the cost of installing new supply wells as opposed to monitoring the supply wells for an extended period. It may be a larger initial capital cost but save in the long run.
Rich stated that supply wells should not be used for monitoring purposes.

Neal wants HP642 used as the receptor for the 2D model that will be presented in the revised CAP. Neal will discuss the options with the Wilmington Office and provide Baker with direction on the CAP.

FY97 SMP

Kate made the Team aware that the budget for next year was going to be $3 million, which is to include investigation, construction, and O&M. Kate provided a copy of the spending plan, without government dollars, so that the Team could prioritize what could be done with the allocated money and determine if items which dollars were budgeted for were not going to be necessary (i.e., RA dollars if a site was going no action).

Site 35 Supplemental Groundwater

Dan Bonk, Baker Project Manager, was invited to the meeting to provide the Team with an update of the recent Site 35 groundwater investigation. Dan displayed figures indicating the temporary well locations and the concentration of contaminants detected in these wells. Dan indicated that the contamination in the Camp Geiger area stretched in the southern direction much further than initially believed. However, Dan believes that the extent of volatile contamination associated with Site 35 has been defined. Dan explained that in addition to the temporary wells, permanent wells have been installed in areas where elevated contamination was detected. Dan explained that groundwater contamination detected to the south of the Site 35 plume is believed to be related to Site 89 and 93. Dan informed the Team that the wells that are proposed to be installed across Brinson Creek will require clearance by Onslow County. This property is not owned by Camp Lejeune. Neal informed Dan that Tom Morris was meeting with Onslow County Public Works in order to get clearance for installing wells in this area.

An additional discussion regarding the Treatability Study (Air Sparging) was initiated by Dan. Dan discussed the need to assess the wetlands prior to construction. Neal and Kate stated that they would arrange for the Army Corps of Engineers to come to the site and determine the impact on the wetlands. Neal would work with individuals at the base if wetland areas had to be borrowed from other areas of the base. Dan stated that he would have the area surveyed and staked in order for the Army Corps to determine where the access road would be installed and where the air sparging treatability studies would be conducted.

Site 89 and 93

After the discussion regarding the findings for Site 35 Matt discussed the scoping proposed for Sites 89 and 93. These two sites are at the southern portion of Camp Geiger and the potential contamination at these sites may be related to a new source. Matt explained that the scope in the draft project plans will be revised to use the same approach that was used to delineate the contamination at Site 35 (northern portion of Camp Geiger). Matt explained that the next version of the project plans will be submitted at the end of May. Phase I of the investigation is scheduled to be conducted in July in order to take advantage of the investigation that is to be conducted at Site 88. Matt stated that the scope of work in the final work plans will be based on the findings of the Phase I investigation.

Site 82 Pump and Treat Sampling

The team came to consensus on the following sampling that needs to be conducted.

Shallow Wells: 6-GW01S, 6-GW32, 6-GW33, 6-GW34, and 6-GW28S

Deep Wells: G-DW01, 6-GW01D, 6-GW27D, 6-GW28D and 6-GW40DWA

All of these wells will be sampled on a quarterly basis at least for the first year. The data for the first year will be evaluated to determine if monitoring frequency, quantity, or contaminants can be reduced. Additionally, water levels will be collected from all wells on a quarterly basis. This data will be used for groundwater modeling.

On a yearly basis, wells 6-GW01DA, 6-GW01DB, 6-GW27DA, and 6-GW40DW will be sampled.

Samples from the operating system will be collected from effluent (discharge) and influent (head of plant) points. All samples will be analyzed for NPDES and volatile contaminants.

In addition to the quarterly and annual sampling, modeling will be done on a yearly basis to evaluate the plume and the effect of the plume on the recovery system.

Long Term Monitoring

This topic has been discussed at several meetings and there were still details on the logistics of the sampling and O&M. Neal wanted to know how we were going to handle the O&M portion of the LTM. Kate stated that the sampling of the wells would be conducted by Baker and the O&M would be handled by OHM. In the case of the treatment plant at the HPIA Baker will handle "from the walls out" and OHM will be responsible "from the walls in."

Neal stated that funding is being sent to the Camp Lejeune FSC to contract the monitoring and O&M. Kate said she would look into the contractual issues using OHM to complete the O&M.

Neal brought up the issue of dealing with the UST sites that require LTM and O&M. Matt asked if he was attempting to handle the sites in a similar manner as the IR sites. Neal said that he would like to and would send a copy of the UST monitoring schedules to Matt. Neal and Kate explained that JA Jones would not be providing the services for the UST sites. Neal explained that JA Jones would provide operations manuals for the treatment plants that they have constructed. Neal and Kate are going to discuss the LTM and O&M issue with Mark Barnes (LANTDIV) about having one contractor handling the LTM and one contractor handling the O&M for both the IR and UST sites.

Matt stated that he would provide modification letters to Beth Collier to initially fund the Bakers portion of the LTM for the HPIA, and Sites 1 and 28. The LTM for Site 2 will need to be under a new CTO because funds are not available under any existing CTO.

SI Reports

The team had a quick discussion on the format of the SI Reports. Gena stated that as long as the reports explain data, risks (qualitative and quantitative if applicable), conclusions for future action, if any, and the need for public review as well as federal and state involvement then the format that is used for the RI reports should be used.

Action Items

Matt

Estimate RL for pesticides at Site 80 using varying ingestion rates and the RBCs.

Gather analytical data to estimate baseline pesticide levels for Camp Lejeune.

Neal

Set up a meeting with Baker, Brent Rowse, and Lynn Phillips to discuss GIS for the base.

Start the wetlands permit process for the treatability study at Site 35.

Speak with Patrick regarding NC DEHNR Wilmington visit to Site 69.

Send Matt information for UST monitoring contracts (sites, number of wells, contaminants)

Kate

Speak with Paul Rakowski about meeting with the State regarding how RCRA sites will be administered.

Gena

Supply the Team with the addresses for submitting documents during the period that the Olympics will be in Atlanta.

Next Meetings

Date:	July 10 and 11, 1996
Location:	Dam Neck
Chair:	Rich Bonelli
Host:	Kate Landman

Date:	September 11 and 12, 1996
Location:	Camp Lejeune
Chair:	Jim Dunn
Host:	Neal Paul

Agenda Topics for Next Meeting

Site 88, 89, and 93 Phase I Field Investigation
Site 73 Phase I Findings (Dan Bonk)
RCRA Investigations
Long Term Monitoring
Comment Update
Patrick's Departure and Replacement
Site 80 TCRA
FY97 SMP
Additional Topics Please Contact Rich