

11/17/04-03592

Capito, Bonnie P CIV NAVFAC Lant

From: Jackson, Rodger W CIV NAVFAC Lant
Sent: Friday, November 19, 2004 12:15 PM
To: Capito, Bonnie P CIV NAVFAC Lant
Subject: FW: State Comments on Revised Draft Phase II SWMU CSI Report



November 17, 2004
Comments SWM...

Lejeune Site File/AR

Rodger W. Jackson, P.E.
Naval Facilities Engineering Command Atlantic
Code EV23
6506 Hampton Blvd.
Norfolk, Va. 23508-1278
Tel: (757) 322-4589 Fax: (757) 322-4805
Email: rodger.jackson@navy.mil

-----Original Message-----

From: Louise.Palmer@CH2M.com [mailto:Louise.Palmer@CH2M.com]
Sent: Wednesday, November 17, 2004 14:30
To: JCULP@mbakercorp.com; Jackson, Rodger W CIV NAVFAC Lant
Subject: FW: State Comments on Revised Draft Phase II SWMU CSI Report

We'll look through these
Louise

-----Original Message-----

From: Louth, Matt/VBO
Sent: November 17, 2004 1:51 PM
To: Palmer, Louise/CLT
Subject: FW: State Comments on Revised Draft Phase II SWMU CSI Report

Hi Louise,

Here are comments from Randy on the SWMU CSI report.

Thanks,
Matt

-----Original Message-----

From: Randy McElveen [mailto:Randy.McElveen@ncmail.net]
Sent: Wednesday, November 17, 2004 1:48 PM
To: Gena Townsend; Bozzini, Chris/CLT; Ron Kenyon; Nina Mendt; Rich Bonelli; WilliamsSR; Diane Rossi; Daniel Hood; Louth, Matt/VBO; Lowder GS11 Robert A; David Lown
Subject: State Comments on Revised Draft Phase II SWMU CSI Report

Attached are the States comments on the Revised Draft Phase II SWMU Confirmatory Sampling Report.

I hope everyone is doing well and has a thankful Thanksgiving holiday!
Randy McElveen, NC Superfund Section

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"He is no fool who gives what he cannot keep to gain what he cannot

loose."

Jim Elliot, Shadow of the Almighty

W. Randy McElveen
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1646 Mail Service Center
Raleigh, NC 27699-1646
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North Carolina
Department of Environment and Natural Resources

Division of Waste Management

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



November 17, 2004

Commander Atlantic Division
Naval Facilities Engineering Command
6506 Hampton Blvd.
Norfolk VA 23508-1278

Attention: Mr. Daniel Hood (NTR)
Navy Technical Representative
Code EV23-DH

RE: Comments on the Revised Phase II SWMU Confirmatory Sampling Report
MCB Camp Lejeune, NC
Soil and Groundwater
Camp Lejeune, NC6170022580
Jacksonville, Onslow County, North Carolina

Dear Mr. Hood:

The NC Superfund Section has received and reviewed the Revised Phase II RCRA SWMU Confirmatory Sampling Report for 47 SWMUs at MCB, Camp Lejeune, Superfund Site located in Jacksonville, NC. The CSI Report is dated November 2002. This document was brought to my attention at the last partnering meeting as an outstanding high priority document on the Clean II report that needed to be reviewed. The following comments are offered for the Work Team's consideration. If you have any questions or comments please contact me at (919) 733-2801 ext. 341.

General Comments

This document is thorough and well organized in a systematic manner and communicates clearly the various Solid Waste Management Units (SWMUs) confirmation sampling results and includes appropriate data and references. Each SWMU however, reference several Appendices in the Activities and Findings Sections that are not included within the Report. This can be provided as an attachment on a CD in electronic format (The State now accepts documents in electronic format). With the exception of areas noted in specific comments below it appears that sufficient investigation work has been completed at each of the SWMUs since groundwater contamination was generally not found and if it was, additional investigation sampling was completed.

1646 Mail Service Center, Raleigh, North Carolina 27699-1646
Phone: 919-733-4996 \ FAX: 919-715-3605 \ Internet: www.enr.state.nc.us

Mr. Daniel Hood

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Acceptable Data Quality Objectives (DQO) at sites with metals contamination, that are not very mobile, may not be met due to insufficient soil data. Generally it appears that most if not all of these SWMUs are sufficiently investigated since they are small specific areas, such as Oil/Water Separators, Dumpsters, Work Shops, etc. In the future it is recommended that where high concentrations of metals are detected in initial samples, that random grid samples be collected in the area adjacent to the SWMU using field instrumentation consistent with EPA guidance. The Department of Energy (DOE) DQO decision process should be used to help guide us in this process <http://www.hanford.gov/dqo> or contact Sebastian Tindall at setindal@mail.bhi-erc.com. If this process is followed it will help make our results more defensible.

The EPA Regions are being trained in this Environmental Decision-Making process with the objective of "institutionalizing" the DQO process.

Specific Comments

1. The **NCAC 2B Surface Water Quality Standards** should be included as a bullet in the screening criteria for surface water at the bottom of page ES-1.
2. All groundwater samples were collected upgradient of SWMU 265 as shown on Figure 1 of this SWMU Section. At least one additional groundwater sample should be collected in the area or downgradient of the Oil/Water Separator.
3. All groundwater samples were collected sidegradient or upgradient of SWMU 285 as shown on Figure 1 of this SWMU Section. At least one additional groundwater sample should be collected in the area or downgradient of the Oil/Water Separator.
4. Figure 1 of SWMU 307 shows G-Street adjacent to the Railroad and SWMU while Figure 1-2 shows C-Street in this area. Please make appropriate corrections for accuracy and consistency.
5. We need to follow-up with additional groundwater investigation in the areas of the different SWMUs (such as SWMU 359 & SWMU 363) with groundwater contaminated with BHC isomers. Alpha, Beta, and Gamma BHC compounds are very mobile in groundwater. We need to assure that the extent of these contaminant plumes in the area of the SWMUs are defined or determine their source. BHC isomers can travel for thousands of feet in the groundwater at concentrations above the 2L standard from a significant source area. It would probably be wise to confirm that these pesticides are not in drinking water wells in the area since pesticides had wide spread use on base. Gamma BHC is generally included in testing at drinking water wells but not the other BHC isomers.
6. The first paragraph on page 4-113 of SWMU 359 states that pesticides may be attributable to IR Site 6. The State recommends that we evaluate groundwater at Site 6 for pesticides, Cadmium and Lead and include the area of SWMU 359. This is important since no further action was recommended at SWMU 359.
7. Figure 2 of SWMU 361 shows "H" Street whereas Figure 1-4 shows "O" Street in the area southeast of SWMU 361 as noted in Section 4.41.1.
8. Monitoring point SWMU 361-TW03 is labeled TW02 in Figures 2 and 3 of SWMU 361.

If you have any questions or comments, please contact me, at (919) 733-2801, extension 341 or email randy.mcelveen@ncmail.net

Mr. Daniel Hood
11-17-2004
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Sincerely,

Randy McElveen
Environmental Engineer
NC Superfund Section

Cc: Dave Lown, NC Superfund Section
Bob Lowder, EMD/IR
Gena Townsend, EPA Region IV