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LETTER AND MICHAEL BAKER TEAM SECOND RESPONSES TO PARTNERING TEAM  
COMMENTS ON THE DRAFT PHASE 2 INTERIM REMOVAL ACTION CLOSEOUT REPORT  
FOR SITE 84 OPERABLE UNIT 19 MCB CAMP LEJEUNE NC

2/25/2005

MICHAEL BAKER JR. INC TEAM

**Second Response to Comments**  
***Draft Phase II Interim Removal Action Closeout Report***  
***Operable Unit No. 19***  
***Site 84 – Building 45 Area***  
***Camp Lejeune, North Carolina***  
***February 25, 2005***

The Draft Phase II Interim Removal Action Closeout Report for Site 84 was submitted to the Partnering Team for review on September 2, 2004. Written comments were received from USEPA, LANTDIV, TMS Envirocon, NC DENR, and Shaw Environmental. Verbal comments were received from the Base's EQB. Following a review by LANTDIV, a response to the first set of comments was submitted to the Partnering Team by email on December 8, 2004.

A second set of comments concurring with or commenting on the first response to comments has been received. This document presents the second set of comments and responses to those comments. Review comments are provided below in **bold** font, followed by the Michael Baker Jr., Inc. responses in *italics*.

**LANTDIV Comments**

**Received from Daniel Hood by email on December 8, 2004**

No comments

**USEPA Comments**

**Received from Gena D. Townsend by email on December 13, 2004**

No comments

**MCB Camp Lejeune EQB Comments**

**Received from Robert Lowder by email on February 17, 2005**

No comments

**NCDENR Comments**

**Received from Randy McElveen by email on February 18, 2005**

1. **Response to NCDENR comment 1 is unacceptable. The large steel pipe was located down the middle of the shallow contaminated soil excavation area along the west side of Site 84 for several hundred feet. At a minimum the approximate location of this pipe should be documented in this closeout report as you agreed in response to comment 10. The closeout report also needs to include the fact that we verbally agreed to return to Site 84 in the future and locate the ends of the steel pipe and take samples to document**

**them as clean or not clean. The soil at both ends of the steel pipe need to be sampled and the results documented. The presence of the second lagoon is not within the removal area of the site. Therefore, it is not necessary that we document its presence in this report. However, when we return to deal with the steel pipe and complete the Technical Evaluation, we should also sample in the area of the second lagoon and document the results along with the soil at the ends of the steel pipe.**

*The approximate location of the section of the steel pipe exposed during the excavation will be shown on Figure 2-7 of the Final Closeout Report.*

*The decision to return to the site to attempt locate the ends of the steel pipe and to sample the pipe ends to determine the extent of contamination, as agreed to at the June Partnering Meeting, was documented in the meeting minutes and does not need to be documented in the Final Closeout Report.*

- 2. Response to NCDENR Comment 2 and 4 needs clarification. Comment 2 and 4 were referring to the same issue. Do surface soils remain on-site after the Phase II Interim Removal that exceed the acceptable industrial land use risk levels? The answer in comment 4 was yes. Therefore, we need to document there extent and reevaluate risk as a priority at this site.**

*Yes, soil does remain at the site in exceedance of the industrial use cleanup goal of 10 ppm for PCBs. The locations of the confirmation soil samples that exceeded the PCB cleanup goal of 10 ppm, together with all other confirmation samples, were shown on Figure 2-6 of the Draft Closeout Report. Figure 2-7 will be added to the Final Closeout Report and will document the locations and analytical results of only the confirmation samples that exceeded the 10 ppm cleanup goal for PCBs. This figure will clearly illustrate the current understanding (based on confirmation sampling results) of the extent of soil contamination remaining at the site in excess of the 10 ppm cleanup goal. It is assumed that the decision to re-evaluate risk at this site will be determined in the upcoming Technical Evaluation.*

- 3. Response to NCDENR Comment 16 is unacceptable. If desired we can meet at the site next Monday, Wednesday or Thursday and I will be glad to show the responder where the photo was taken. The photo even states that highway 24 is in the background (you can see cars on the road). Highway 24 is north and east of the site not south. Please make the change as requested in my original comment.**

*Photo 24, in Appendix A of the Draft Closeout Report, was taken from the northwestern corner of the excavation (near confirmation sample SC-69) looking almost directly east toward Highway 24. When the approximate location of the exposed steel pipe is shown on Figure 2-7, it will be clear where the photo was taken from. (Note: In the Draft Closeout Report, it was incorrectly stated that the photo was taken from the northeast corner of the excavation, not the northwest corner. This has been corrected for the Final Closeout Report.)*

## Additional NCDENR Comments

Received from Randy McElveen by email on February 23, 2005

I have one last comment in regard to Comment Response #2. You state that "This figure will clearly illustrate the current understanding (based on confirmation sampling results) of the extent of soil contamination remaining at the site in excess of the 10 ppm cleanup goal." Do we know the extent, vertically and horizontally, of the PCB contamination on the fringes of the excavation area (especially in surface soils)? If not, we will need to take supplemental samples in these areas (in proposed Figure 2-7) during the Technical Evaluation. If this is agreed, the State concurs with the responses to comments dated February 25, 2005 and has no other comments on the Site 84 Close Out Report.

*As we understand your question, you are asking either one of two things:*

*1) Do we know the areas along the sidewalls and floor that still have samples with concentrations exceeding 10 ppm (the remediation goal)?*

*- Yes, we know which four sidewall samples (taken from a depth of 0-2 feet) still have concentrations exceeding 10 ppm. We also know which floor samples have concentrations exceeding the remediation goals. Two of the floor samples were at a depth of 2 feet and the other two were subsurface samples from the original TPH contaminated area in the southeastern portion of the site. These areas will be shown on Figure 2-7 in the Final report, but are approximate. The exact locations of the confirmation samples were not located with GPS.*

*2) Do we know how much further the contamination extends past the excavation area and how much more soil will need to be removed?*

*- No, we do not know how much further the extent of the contamination extends past what was uncovered during the Phase II Removal Action. No additional sampling was conducted beyond the last confirmation samples when it was agreed that no more excavation would be conducted under the Phase II Removal Action at the site. We do not know how much additional PCB contamination exists past the boundaries of the excavation area illustrated on the maps. To determine how much contamination still exists, additional sampling will be necessary.*