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MCB CAMP LEJEUNE
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CERTIFIED MAIL RETURN RECEIPT REQUESTED

North Carolina Department of Environment,
Health, and Natural Resources
Attn: Mr. Patrick Watters
P.O. Box 27687
401 Oberlin Road
Raleigh, North Carolina 27611

Re: MCB Camp Lejeune; Response to NC DEHNR Comments on the Draft Final RI/FS Project Plans for Operable Unit No. 7 (Sites 1, 28, & 30)

Dear Mr. Watters:

This letter addresses your comments on the above referenced project. Navy/Marine Corps responses are attached. These comments have been incorporated in the Final version of the documents (issued by Baker on 12/15/93) which you should have already received under separate cover.

Any questions concerning these responses should be directed to Ms. Katherine Landman at (804) 322-4818.

Sincerely,

L. A. BOUCHER, P.E.
Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Attachment

Copy to:
EPA Region IV (Ms. Gena Townsend)
MCB Camp Lejeune (Mr. Neal Paul)
Activity Admin Record File

Blind copy to:
18232 (w/attachment)
18S
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Response to Comments Submitted by the State of North Carolina DEHNR - Division of Solid Waste Management on the Draft Final RI/FS Project Plans for Sites 1, 28, and 30 (Operable Unit No. 7), MCB Camp Lejeune, North Carolina Comment Letter by Mr. Patrick Watters, dtd 23 Nov 93

Response to the General Comment

1) Per our telephone conversation on November 9, 1993, surface water/sediment samples collected in a nearby downgradient stream will be used to confirm the presence or absence of the suspected source area. In addition, quick turnaround soil samples (seven day turnaround) will also be used to evaluate the extent of contamination downgradient. If indications of contamination are present in the quick turnaround soil samples, the grid will be expanded and additional soil samples will be collected to further delineate the extent of contamination. Moreover, additional shallow monitoring wells may also be installed.

Response to Specific Comments - Work Plan (Comments 1 through 3)

1) The reference to the HIPA in the third sentence will be changed FCLDA.

2) Test pit excavations will be performed if the suspected waste material is noted within the first five feet below ground surface during drilling activities. Five feet was selected due to the high water table in the area which would limit the use of a backhoe for the excavations. This statement will be added to the Work Plan and FSAP.

3) The well identified as 1GW1 will be changed to 28GW1.

Response to Specific Comments - Field Sampling and Analysis Plan (Comments 4 through 10)

4) The term mitigation will be changed to migration. Additionally, airborne fugitive particles from contaminated surface soil will be added to the Exposure Pathways list.

5) Table 2-1 will be revised to include Sites 28 and 30.

6) The actual number of shallow wells to be installed is nine. These include 1GW7 through 1GW13, 1GW16S, and 1GW17S. Wells 1GW16S and 1GW17S will be installed as paired well clusters with deep wells. These changes will be made in the Final Work Plan and FSAP.

Attachment

7) Supply Well HP-636 will be added to Table 3-2 in the FSAP.

8) Section 3.2.3.3 will be renumbered as 3.2.2.3.

9) Well 1GW1 will be replaced with 28GW1.

10) Well 30GW1 will be sampled for engineering parameters. This change will be made in the FSAP.

Response to Specific Comments - Site Health and Safety Plan (Comments 1 through 4)

1) Page 5-2 - This radiation meter has two separate probes. The external probe is the Scintillator tube which has a setting for milliroentgen (m/R) per hour scale. This probe is used for higher energy gamma sources. Whereas, the GM Pancake internal probe is a different probe used with a separate setting on the instrument. The internal probe measures beta and lower energy gamma and registers as counts per minute.

2) The determination of protection levels and work stop scenarios based on air monitoring results are the result of reviewing and considering various factors, such as:

   - Previous work experience conducting these types of work tasks with the anticipated potential chemical concerns
   - The low concentration levels of contaminants determined from previous analytical results
   - These chemicals have been diluted in the various media and are not being handled in a pure form
   - The limited amount of time individuals are actually in situations where volatilization can occur
   - The rapid dispersion of a contaminant outdoors.

   Based on these factors and the fact that conservative air monitoring results would trigger protection upgrades or work stoppage, the protection levels assigned are safe.

3) The revised HASP states that "if vinyl chloride is detected in the breathing zone with Drager tubes, work will stop, and the Project Health and Safety Officer will then be consulted".

4) Based on previous analytical results, the site history, and work tasks planned, the established personal protection levels and work stoppage situations presented in Section 5.1 are safe.

Response to Specific Comments - Quality Assurance Project Plan

No comments were received from NC DEHNR on the Draft Final Quality Assurance Project Plans.