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MCB CAMP LEJEUNE
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Baker

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June 14, 1994

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

Attn: Ms. Linda Berry, P.E.
Code 1823

Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Orders (CTOs) 0174 and 0177
RI/FS for OUs 1 & 5
MCB, Camp Lejeune, North Carolina

Dear Ms. Berry:

Attached please find the minutes for the meetings conducted on June 6 and 7, 1994. For your convenience, these minutes have been provided on the enclosed disc under the file name "minutes."

If you have any questions, please do not hesitate to contact me at (412) 269-2016.

Sincerely,

BAKER ENVIRONMENTAL, INC.

Raymond P. Wattras
Activity Coordinator

Attachments

RPW/jc

cc: Ms. Lee Anne Rapp (w/o attachment)
Ms. Beth Hacic (w/o attachment)
Mr. Neal Paul (w/attachment)

Meeting Minutes, June 6, 1994
Discussion of Proposed Remedial Alternatives for
Operable Units 1 (Sites 21, 24, and 78) and 5 (Site 2) at
MCB, Camp Lejeune, North Carolina

A meeting was conducted at the North Carolina Department of Environment, Health, and Natural Resources (DEHNR) office in Wilmington, North Carolina on June 6, 1994. The purpose of the meeting was to present and discuss the Department of Navy(DON)/Marine Corps' proposed remedial alternatives for Operable Units 1 and 5.

The following personnel were in attendance:

Ms. Linda Berry (LANTDIV)
Mr. Neal Paul (MCB Camp Lejeune)
Ms. Gena Townsend (EPA)
Mr. Patrick Watters (DEHNR)
Mr. Rick Shiver (DEHNR)
Mr. Bruce Reed (DEHNR)
Ms. Betty Wilcox (DEHNR)
Mr. Brian Wagner (DEHNR)
Mr. Jack Butler (DEHNR)
Mr. Roy Byrd (DEHNR)
Ms. Tammi Halapin (Baker Environmental, Inc.)
Mr. Don Shields (Baker Environmental, Inc.)
Mr. Ray Wattras (Baker Environmental, Inc.)

Ms. Linda Berry began by stating the purpose of the meeting. The attendees then introduced themselves and Ray Wattras provided an overview of the agenda. The agenda items included presentations for Operable Units 1 and 5, and a presentation on a study of metals in groundwater at MCB Camp Lejeune.

Tammi Halapin gave the presentation for Operable Unit 1. The presentation focused on the history of the sites, the results of the remedial investigation and human health/ecological risk assessments, and the preferred remedial alternative. The preferred alternative involves the following: remediation of groundwater at two areas of concern within Site 78 (expansion of the interim remedial action), removal and offsite disposal of pesticide and PCB contaminated soil at Site 21 and Building 1502; long-term groundwater monitoring throughout the operable unit; and institutional controls to prevent the installation of supply wells within the operable unit. There were no pertinent questions or comments for Operable Unit 1.

Don Shields gave the presentation for Operable Unit 5. The presentation was similar to the one for Operable Unit 1. The DON/Marine Corps' preferred alternative involves long-term groundwater monitoring. Since a time-critical removal action of contaminated soils and sediments will be initiated in July 1994, no further action will be required for soil based on the human health and ecological risk assessment.

Rick Shiver asked whether the supply wells were sampled as part of the RI. In addition, Mr. Shiver asked whether there were any supply wells located at the water treatment plant which is across from the former pesticide storage area. Don Shields replied that there are no supply wells located at the water treatment plant and that the base

periodically monitors the quality of supply wells. Since data are currently available for the supply wells near Site 2, no additional sampling was conducted.

Ray Wattras presented the findings of a study conducted to evaluate metals in groundwater at MCB Camp Lejeune. Mr. Wattras explained that the purpose of the study was to provide information on groundwater and soil that could be evaluated in consideration of not remediating total metals in shallow groundwater at Operable Units 1 and 5. It was noted that total metals in groundwater at both Operable Units 1 and 5 would not be remediated under the DON/Marine Corps' preferred alternatives.

The primary conclusion of the groundwater study was that elevated total metals in groundwater is likely due to a combination of geologic factors (loosely compacted soil in the shallow groundwater zone) and biased analysis due to suspended particulates. The recommendation, based on the conclusions of the groundwater study, was to not remediate total metals in groundwater at either Operable Units 1 or 5.

Rick Shiver commented that he does not doubt that suspended solids may be influencing high detections of metals in groundwater, but there is no supporting data (e.g., total suspended solids) to verify the conclusions of the study. Ray Wattras indicated that although TSS data are not available, other information presented in the RI report and in the report generated by this study support the conclusions. Copies of the study were provided to both Ms. Gena Townsend and Mr. Shiver.

Ms. Gena Townsend asked Mr. Shiver what would the DON/Marine Corps need to do at this point to get the State's concurrence for the preferred alternatives. Mr. Shiver stated that total metals in groundwater would need to be monitored as part of the remedial action and data obtained to support that elevated total metals in groundwater are due to suspended particulates rather than from former disposal activities.

The parties involved agreed that both records of decisions would include monitoring total metals in groundwater and that a determination would be made in the future as to whether further action would be needed to remediate metals if needed. CERCLA provides for a re-evaluation of the alternative when the selected remedy is not a permanent solution or when wastes remain at a site.

The meeting concluded at approximately 1500.

Meeting Minutes, June 7, 1994
Status of IR Program Activities
MCB, Camp Lejeune, North Carolina

A meeting was conducted at MCB, Camp Lejeune, North Carolina on June 7, 1994. The purpose of the meeting was to review the status of IR Program activities associated with Operable Units 1 through 13.

The following personnel participated at the meeting:

Ms. Linda Berry (LANTDIV)
Mr. Neal Paul (MCB Camp Lejeune)
Ms. Gena Townsend (EPA Region IV)
Mr. Patrick Watters (North Carolina DEHNR)
Mr. Ray Wattras (Baker Environmental, Inc.)

Summarized below are the pertinent issues that were discussed for each operable unit.

Operable Unit 1 (Sites 21, 24, and 78)

- Baker will submit revised draft final RODs for OU 1 and 5 on June 17, 1994. This version of the ROD will include language justifying not remediating total metals in groundwater at both operable units. The ROD will not indicate that a waiver is required.

- The ROD for OU 1 will indicate that long-term groundwater monitoring is required and that the selected alternative will be re-evaluated in 5 years per CERCLA. The specifics of the monitoring program such as which wells will be included does not have to be identified in the ROD. This information, as well as other information related to the sampling, analysis, and reporting of groundwater results, will be included in a Remedial Action Work Plan.

- The FY95 Site Management Plan will show that a Remedial Action Work Plan for OU 1 will be prepared.

- State comments on the draft final RI and FS are due as soon as possible. All EPA comments have been received. Ray Wattras indicated that final RI is due no later than June 27 and the final FS and PRAP are due on July 17, based on the FY94 Site Management Plan. Ray Wattras requested that the State submit their comments on the RI no later than June 20.

- A public meeting was tentatively scheduled for July 26, 1994. The meeting will be held at the Tarawa Terrace Gymnatorium at 7:00. The TRC meeting will be held that afternoon at Building 1 at MCB, Camp Lejeune.

- A discussion was held concerning whether the Navy/Marine Corps or Baker will prepare the Public Notice and place the notice in the newspaper. Linda Berry will look into the latest policy regarding this issue.

- LANTDIV will need to request an extension for finalizing the ROD. The FY94 SMP indicates that the ROD will be finalized on August 18, 1994. Since the public comment period will end on August 25, 1994, the ROD will likely be finalized in September. Baker can provide the final ROD on or before September 8, if the

comment period ends on August 25, 1994, which gives the Activity (i.e., Neal Paul) until the end of September to sign the ROD.

Operable Unit 2 (Sites 6, 9, and 82)

- Ray Wattras indicated that prior to finalizing the Supplemental Aquatic Survey, Baker would like to discuss two changes to the human health risk assessment. The changes involve reducing the average number of days that a person would fish in Wallace Creek (from 48 to 24), and reducing the weight of fish consumed per meal from 145 grams/meal to 73 grams/meal. The impact of these changes will result in carcinogenic human health risks for fish consumption that are within 1E-04 and 1E-06.

- The reduction in fishing days was based on site-specific information collected by the Activity. The reduction in the weight of fish consumed is based on a study conducted by the Great Lakes Sport Fish Advisory Task Force. Both Gena Townsend and Patrick Watters requested a copy of the study for their staff to review. Ray Wattras will send the study.

- With respect to fish advisories, Ray Wattras indicated that Tom Biksey of Baker has spoken to the one person at the State who has the authority to establish fish advisories. Tom Biksey indicated that according to his discussions with the State representative, no one factor (e.g., FDA levels or risk assessment) is considered when making a decision. Patrick Watters asked if Ray Wattras could provide him with the name of this person.

- With respect to finalizing the Supplemental Aquatic Survey, a conference call between EPA, DEHNR, LANTDIV, and Baker was discussed.

Operable Unit 4 (Sites 41, 69, and 74)

- Ray Wattras reported that the preliminary draft RI report will be submitted on or before July 16, 1994. Only LANTDIV and the Activity receive the preliminary draft report. The draft RI will be submitted in on or before September 14, 1994.

- The preliminary draft FS will be submitted to LANTDIV and the Activity on or before August 15, 1994. The draft FS will be submitted to EPA and the DEHNR on or before October 12, 1994.

Operable Unit 5 (Site 2)

- A revised draft final ROD will be prepared to incorporate a justification for not remediating total metals in groundwater. In addition, the justification for not treating organics in groundwater will also be included under the section entitled "Statutory Determination." The ROD will not contain language indicating that an ARARs waiver is required.

- The revised draft ROD will be submitted by Baker on June 17, 1994.

- Ray Wattras indicated that all State comments to the Draft Final RI and FS have been received, but no EPA comments were received for the FS. Gena Townsend indicated that she thought that she had forwarded FS comments. Linda Berry will check on this issue. (Since this meeting, EPA comments were located.)

- Based on the FY94 SMP schedule, the final RI and FS are scheduled to be submitted on June 13 and June 27, respectively. (Note that late receipt of comments may result in Baker not meeting the June 13 date. This would not constitute a violation of the FFA schedule since comments were received on May 23. Under the FFA, the Navy/Marine Corps has 30 days to finalize the RI report following receipt of comments. This would equate to a submittal date of June 23, 1994.)

Operable Unit 6 (Sites 36, 43, 44, 54, and 86)

- The Draft RI/FS Project Plans were submitted on June 6, 1994. Under the FFA requirements, comments are due within 60 days.

- The FY95 SMP shows that the RI/FS field work will be funded on March 1, 1994. Since the plans are scheduled to be finalized in December, Linda Berry indicated that she may consider an earlier startup to eliminate the 3 month delay between the Project Plan stage and the RI/FS.

Operable Unit 7 (Sites 1, 28, and 30)

- Ray Wattras reported that the field work for OU 7 was completed in mid May. The preliminary draft RI is scheduled to be submitted to the Navy/Marine Corps on September 26, 1994, based on the FY95 SMP schedule.

Operable Units 8 (Site 16), 11 (Sites 7 and 80), and 12 (Site 3)

- All EPA comments to the draft RI/FS Project Plans have been received; however, State comments have not. Patrick Watters will look into when comments are due. Since the 60 day comment period is over, State comments which are received prior to the Draft Final Project Plans will be incorporated into the Final Project Plans.

- Ray Wattras indicated that the draft final Project Plans are due on or before July 13, 1994.

- Currently, the draft FY 95 SMP schedules for the three OUs are identical. In order to avoid difficulties with both preparing and reviewing the documents, a decision was made between the parties to stagger the submittal of the RI, FS, PRAP, and ROD documents. The schedules for OUs 8, 11, and 12 will be staggered in the draft final SMP so that multiple RI or FS reports are not submitted on the same day.

Operable Unit 9 (Sites 65 and 73)

- LANTDIV is conducting a soil gas/geoprobe survey at Site 73. The results will be used to scope the RI at this site. Details of these results will be included in the RI/FS Project Plans.

- A meeting to discuss the sample strategy plan for OU 9 was tentatively scheduled for June 30 in Atlanta, Georgia.

Operable Unit 10 (Site 35)

- The public meeting was tentatively scheduled for the evening of July 27, 1994.

- Baker is preparing the Draft Final Interim Remedial Action RI/FS and PRAP documents. These reports will be submitted sometime during the week of June 13, 1994.

- The comprehensive RI/FS report is due to LANTDIV on or before September 5, 1994.

Miscellaneous

- Gena Townsend suggested that we meet with the State sooner in the future (as opposed to when we are ready to sign the ROD) in order to avoid possible delays due to disagreements or other factors. The parties agreed that a meeting could possibly be conducted following the submittal of the draft RI and FS report, or when State comments are received.

- Ray Wattras inquired about whether DEHNR personnel were to receive draft final and final versions of the reports. Patrick Watters indicated that he and his staff are currently discussing this issue. Mr. Watters indicated that he would inform us of the new policy regarding report distribution as soon as DEHNR reaches an agreement.

- The next version of the FY95 SMP will include a chronological listing of deliverables.