

Capito, Bonnie P. (EFDLANT)

From: Raines GS12 Rick H [RainesRH@lejeune.usmc.mil]
Sent: Monday, December 04, 2000 2:00 PM
To: Kirk Stevens (E-mail)
Cc: Burton GS07 Thomas H; Paul GS13 Neal N
Subject: Site 3 Close out report

Kirk,

I have review the Closeout report for site 3 and have the following concerns:

Section 1.3 Executive Summary Page 1-2

1. The second paragraph 1st line discusses "the only soils". This seems to be a typo error. Please correct.

2. This section discusses the fact that six soil pile were disposed of the at the landfill although they did not meet the landfill's disposal criteria. Six samples were above Benzo(a)pyrene and one soil pile D-16 was above for Dibenzo(a,h)anthracene. Although the samples were below LDRs they were not below the EPA Region III Industrial RBGs. It would seem to me that we violated the requirements of the ROD. How did this happen? How can it be prevented from happening again? What steps are being taken to make sure?

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The last paragraph discusses the disposal requirements. This section is very confusing. Reviewing the table 6 it seems that originally there were 9 samples that were above the levels for disposal. 3 were mixed with an excavator to enhance biodegradation producing 2 acceptable piles for disposal and one was discounted based on its duplicate sample leaving 6 piles with above limits contamination. How was the mixing carried out? Was each pile individually mixed or was it a group mix? Please explain. Also please add some explanation on how we did not meet the disposal criteria however this disposal operation was still within regulations. This may be a good place to add Ted Simmon's Memo on the Risk Evaluation that was done. Please let me know if you have any questions or concerns

Rick