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State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director

DEHNR

March 17, 1994

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823-2
Attention: MCB Camp Lejeune, RPM
Ms. Katherine Landman
Norfolk, Virginia 23511-6287

Commanding General
Attention: AC/S, EMD/IRD
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

RE: Draft Site Inspection Project Plans for Sites A, 12, 68, 75, 76, 84, and 85

Dear Ms. Landman:

The referenced document has been received and reviewed by the North Carolina Superfund Section. Our comments are attached. Also, comments on the Health and Safety Plan is attached to this letter as a memo from David Lilley, our Industrial Hygienist to myself. Please call me at (919) 733-2801 if you have any questions about this.

Sincerely,

Patrick Watters

Patrick Watters
Environmental Engineer
Superfund Section

Attachment

cc: Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune
Bruce Reed, DEHNR - Wilmington Regional Office

North Carolina Superfund Comments
Draft Site Inspection Project Plans for
Camp Lejeune Sites A, 12, 68, 75, 76, 84, and 85

Work Plan Comments

1. Page 2-9, Section 2.1.11
   This section indicates that the water treatment plants have a total capacity of 15,821 million gallons per day which should be 15.821 million gallons per day.

2. Page 2-14, Table 2-2
   The areas indicated for the different sites in this table are not consistent with the size of the study areas shown in the various figures throughout the document.

3. Page 4-7, Section 4.3.4
   The third bullet under Soil Investigation does not indicate how many samples will be taken in the soil sampling grid if the geophysical evaluation does not find evidence of buried drums.

Sampling and Analysis Plan

4. General

   Groundwater Investigations
   It is not clear why both the shallow and deep aquifers are being assessed only for Site 68 and not the other sites covered by this project plan.

   Test Pits
   It is not clear why test pits are planned for Site A while soil borings are being used for the other sites. Very little is known about the location of Site A or the nature of the contaminants that may be present. It would seem to be more prudent from a safety and site investigation perspective due to the uncertainties of this site to initially use soil borings instead of test pits. The effort expended for the six test pits at Site A could be used for soil borings that would cover a much broader area. Whether or not contamination is found in any of the proposed test pits, there may still be concerns about the adequacy of the site investigation immediately north and south of the study area. Another consideration of soil borings versus test pits is the potential amount of investigation derived waste that will require disposal.

US Army Technical Escort Unit (TEU)
The project plan indicates that a US Army TEU will be used for Sites 75 and 76 to screen for chemical agents. It would seem appropriate to include this provision for Sites A and 68 unless there is other information indicating this would not be necessary.

Soil Sampling Depths
The Sampling & Analysis Plan does not indicate the depth of the Site A test pits. Also, the soil sampling depths vary from site to site as listed below with no rationale provided to explain why different depths are to be used.

- Sites 12: One soil sample at each location just above the water table.
- Sites 28, 75, and 76: Two soil samples at each location at the surface (0"-12") and "above the water table".
- Sites 84 and 85: Two soil samples at each location at 0"-12" and 12"-24".

5. Page 3-1, Section 3.1
Please explain why surface water and sediment samples are not being taken for Site A.

6. Page 3-1, Section 3.1.3
The groundwater investigation scheme for Site A calls for one sample to be taken from the existing two monitoring wells. One of these wells is over 300 feet upgradient from the edge of the suspected disposal area which may provide good data on background conditions but not on the suspected disposal area. Since this essentially provides only one specific data point, there needs to be additional wells installed to investigate Site A.

7. Page 3-3, Section 3.2
The need for a unexploded ordnance (UXO) survey for Site 12 is acknowledged in the Health & Safety Plan, however it might be worth listing this under Section 3.2 as part of the support activities for the site.

8. Page 3-5, Section 3.2.2.2
Explain why the analytical requirements for Site 12 samples do not include explosive ordnance constituents.

9. Page 3-7, Section 3.3
Please indicate the rationale for not performing a geophysical or UXO survey for Site 68.

10. Page 3-21, Section 3.7.2
The groundwater investigation plan for Site 85 calls for only two wells within the study area with the third well located ~700 ft NE (possibly upgradient) of the study area. Two wells may not provide enough data to assess the nature of the groundwater contamination resulting from the battery disposal areas.

11. <u>Page J-3, Appendix J</u>
The description of the criteria for handling PCB contaminated waste is not consistent with the EPA publication: "Guidance on Remedial Actions at Superfund Sites With PCB Contamination", OSWER Directive No. 9355.4-01.

12. <u>Attachment A of Appendix K</u>
Some of the holding times indicated on Attachment A are not consistent with those on pages 6-2 and 6-3 of the Quality Assurance Project Plan.

March 1, 1994

TO: Patrick Watters

FROM: David Lilley DBL

RE: Comments prepared on the Draft Health and Safety Plan, Site Inspection, Sites A, 12, 68, 75, 76, 84, and 85, Marine Corps Base, Camp Lejeune, NC

After reviewing the above mentioned document, I offer the following comments:

1. Page 5-1: Please provide more information on exactly what a "Minicam Model FM-3000" is, who makes it, what environmental parameters it measures, and what conditions activate the alarm.

2. Page 5-1, Under the heading "Drager Tubes": Where level C is recommended, the phrase "if adequate NIOSH certified air-purifying cartridge is available" is used. This phrase should also be used where level C is recommended under the "PID" heading.

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