

Baker

Baker Environmental, Inc.

Date: 3/3/93

Navy CLEAN
FAX Transmittal Page

TO: (company) LANTDIV
(attention) Ms. Linda Berry

FROM: (name) Ray Wattas

Number of Pages (including this sheet) 4

Receiving FAX Number: (804) 445-6662

MESSAGE:

The following responses have been revised based on discussions with Ms. Michele Glenn and 3/2/93:

- "General Response No. 1" (2 revisions)
- "Specific" Responses 3 and 5.

Call me if you have any questions.

If you do not receive the number of pages indicated, please contact our office as soon as possible.

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**Response to Comments Submitted by the
US Environmental Protection Agency, Region IV
on the Draft Final RI/FS Work Plan and Sampling and
Analysis Plan for Operable Unit No. 1
MCB Camp Lejeune, North Carolina
Comment Letter Dated 2/11/93**

Responses to Draft Final Work Plan Comments

Responses to General Comments

1. The response to EPA General Comment No. 3 indicated that all newly-installed monitoring wells will be analyzed for full TCL organics and TAL inorganics. The Final Work Plan and Sampling and Analysis Plan have been revised to indicate this. The response also indicated that only soil samples collected as part of the soil gas survey will be analyzed for full TCL organics and TAL inorganics. Soil samples collected at various areas of concern where the former waste practice is known (UST tanks, pesticide mixing areas, etc.) would only be analyzed for the suite of contaminants that would expected to be present. However, ~~at least 10 percent of these~~ ^{all} soil samples from the various areas of concern will be analyzed for full TCL organics and TAL inorganics. X

The following changes were made to the Final RI/FS Work Plan:

- A subsection has been added to Section 5.3.1.3 (Soil Investigation) describing the collection of soil samples at areas of concern identified by the Soil Gas Survey. Note that the response to EPA General Comment No. 3 indicated that soil samples collected as a result of the soil gas survey will be analyzed for full TCL organics and TAL inorganics and soil samples collected from various areas of concern (UST areas, pesticide mixing areas at Site 21, etc.) will only be analyzed for the suite of contaminants expected to be present due to former waste practices. Also note that at least 10 percent of the samples (~~in most cases more than 10 percent~~ ^{all of the}) collected from UST areas or pesticide mixing areas will be analyzed for full TCL organics and TAL inorganics. Table 5-1 has been revised in accordance with the above changes. J
- Section 5.3.1.4 and Table 5-1 have been revised to indicate that all newly-installed monitoring wells will be sampled and analyzed for full TCL organics and TAL inorganics.
- Section 5.3.2.2, Table 5-1, and Figure 5-9 have been revised to indicate that soil samples collected from test borings that will be used as monitoring well locations will be analyzed for full TCL organics and TAL inorganics.
- Section 5.3.2.3, Table 5-1, and Figure 5-9 have been revised to indicate that groundwater samples collected from newly-installed wells will be analyzed for full TCL organics and TAL inorganics.
- Not all soil samples collected at Site 24 will be analyzed for full TCL organics and TAL inorganics. Based on existing groundwater data (full TCL organics and TAL inorganics), only elevated levels of inorganics have been detected at various areas of concern. Approximately one-half of the soil samples collected at Site 24 will be analyzed for full TCL organics and TAL inorganics. The remaining soil samples will only be analyzed for full TAL inorganics. We feel that the proposed sampling

X Surface

Surface soil samples

scheme at Site 24 (and other sites) will be sufficient to determine the extent and nature of contamination, assess human health and ecological risks, and evaluate remedial alternatives.

2. The response did not indicate that background surface water and sediment data will be incorporated into the RI/FS Work Plan. The background data will be used in the RI and FS reports as appropriate (i.e., nature and extent of contamination, risk assessment, remediation goals, etc.). Background surface water and sediment data from these surface waters will not influence the RI/FS scope of work at Operable Unit No. 1 and therefore, it is not necessary to include this information in the Work Plan.
3. With respect to background surface water and sediment data, please refer to response No. 2.

Background soil samples are discussed in Section 5.3.1.3. Groundwater background quality is discussed in Section 5.3.3.3 (second paragraph has been revised to indicate which monitoring well will be used to assess background groundwater quality for the entire Operable Unit No. 1).

Response to Specific Comments

1. The initial response may be misleading with respect to the soil sampling locations. Although the "exact" sampling location is unknown (the figure depicting the sampling locations was scaled at one inch equals one thousand feet), the "general" sampling location is known. We disagree that the information is of little value. The information is valuable with respect to knowing the types of contaminants present at the site as well as the concentrations detected. The general areas that these samples were collected (i.e., inside the fence, outside of the fence) is also valuable from a standpoint of potential contaminant migration, and where samples have been collected previously.
2. No response required. INSERT (A) "see next Pg"
3. ~~Neither area is believed to be considered as a source area (see previous response for rationale). However, a soil gas survey will include Buildings 1202 and 1709 in order to determine whether elevated VOCs are present in the groundwater (elevated VOC levels in groundwater may be indicative of a source area. If elevated levels of VOCs are encountered in either area via the soil gas survey, soil samples will be collected to verify whether a source (of groundwater contamination) is present as described in Section 5.3.1.3.~~
4. Analytical results for monitoring well HPGW21, HPGW29, and HPGW20 are included in Appendices A, B, and C. These appendices include the "historical" sampling and analysis for all wells at the HPIA.
5. Please refer to response No. 1 under "General Comments" (above). In summary, full TCL and TAL are not necessary for all samples, especially in areas where the history of the waste handling activities are known (e.g., UST storage tanks, pesticide mixing areas, etc.). ~~Over 10 percent of all surface soil samples are being analyzed for full TCL organics and TAL inorganics.~~
6. The Department of the Navy accepts the consequence of using PVC monitoring wells at Operable Unit No. 1. Justification is provided in Section 5 of the SAP.

INSERT A

Test borings were drilled at Building 1202 during a previous investigation. Soil samples were collected for full TCL volatile analysis. Limited contamination was detected (acetone and methylene chloride, which are common laboratory contaminants). These results can be found in Appendix B (see sample analyses for soil borings HPSB16, -17, -18, -19, and -20). In addition, groundwater samples collected from this area are limited, suggesting that the contamination present in this area is related to a source area upgradient from Building 1202 (i.e., the 1600 Building Area). Based on this information, Building 1202 is not believed to be a source area and no additional soil sampling is warranted.

With respect to building 1709, monitoring wells in this area are primarily contaminated with low levels of TCE and benzene. The contamination in these wells are related to a source area (i.e., the 1600 Building Area) upgradient from Building 1709. Geophysical investigations performed around Building 1709 did not detect any underground storage tanks, which are believed to be possible sources of groundwater contamination throughout the HPIA. Based on the low levels of groundwater contamination (and the fact that the contamination is related to a plume from the Building 1600 Area), and the fact that no USTs are present, no soil sampling is warranted around Building 1709.