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MCB CAMP LEJEUNE
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Baker

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February 26, 1993

Commanding Officer
Atlantic Division
Naval Facilities Engineering Command
Building N-26, Naval Station
Norfolk, Virginia 23511-6287

Attn: Ms. Linda Berry, P.E.
Engineer-in-Charge
Code 1822

Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0106
RI/FS Project Plans for Operable Unit No. 1
MCB Camp Lejeune, North Carolina

Dear Ms. Berry:

Attached are responses to comments submitted by the U.S. Environmental Protection Agency, Region IV, and the North Carolina Department of the Environment, Health, and Natural Resources. The comments pertain to the Draft Final RI/FS Project Plans for Sites 21, 24, and 78 (Operable Unit No. 1) at MCB Camp Lejeune. Also enclosed is a disc which contains the responses (file name: C106RESP).

Baker is revising the Draft Final Project Plans in accordance with the attached responses. We anticipate that the Final RI/FS Project Plans will be submitted on or before March 8, 1993.

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

Sincerely,

BAKER ENVIRONMENTAL, INC.

Raymond P. Wattras

Raymond P. Wattras
Project Manager

RPW/nd
Attachment
Enclosure

cc: Ms. Lee Anne Rapp, P.E., Code 183
Mr. Keith Simmons, P.E., Code 0223
Mr. Byron Brant, P.E., Code 1822
Mr. Neal Paul (CLEJ)

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 soil samples from the various areas of concern will be analyzed for full TCL organics and TAL inorganics.

   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) 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.

   - 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

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.

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.

Response to Comments for the Draft Final RI/FS Sampling and Analysis Plan for Operable Unit No. 1

1. 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.

2. The description of the coring device and decontamination procedures are provided in Sections 5.5 and 5.6.1.2, respectively. The description of the coring device has been revised with information provided by the manufacturer. In addition, a sampling procedure has been added as an appendix. The decontamination procedure provided in Section 5.6.1.2 is for stainless steel or metal sampling equipment such as hand coring devices.

3. The frequency for collection of the preservation blank has been revised in accordance with the comment.

4. Stainless steel inserts will be used.

Response to Comments Submitted by the North Carolina DEHNR 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 2/10/93

Health and Safety Plan

Discussions between Ms. Barbara Cummings and Mr. Ron Krivan of Baker with Mr. Lilly have been incorporated into the Final HASP.

Sampling and Analysis Plan

The second paragraph has been omitted in accordance with the comment.

Work Plan

No response required.