

Baker

Baker Environmental, Inc.
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July 27, 1993

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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 Order (CTO) 0160
Draft Interim RI/FS Project Plan Operable Unit No. 10 (Site 35)
Response to USEPA Comments

Dear Ms. Berry:

Baker Environmental, Inc. (Baker) has prepared responses to comments submitted by the USEPA, Region IV on the Draft Interim RI/FS Project Plan for Operable Unit No. 10 (Site 35 - Camp Geiger Fuel Farm). The responses are provided in Attachment A. EPA comments are included in Attachment B. Baker's responses to comments have been included for revision by LANTDIV if necessary on the enclosed disk under the file name "response" (WordPerfect 5.1).

Baker will submit the Final Interim Project Plans within seven (7) days following receipt of North Carolina DEHNR comments, or no later than August 16, 1993.

If you have any questions, please do not hesitate to contact me at (412) 269-2063, or Mr. Raymond Wattras at (412) 269-2016.

Sincerely,

BAKER ENVIRONMENTAL, INC.

for 
Daniel L. Bonk
Project Manager

DLB/mp
Attachment A - Response to Comments
Attachment B - EPA Comments

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



A Total Quality Corporation

Attachment A
Responses to EPA Region IV
Comments - Draft Interim RI/FS
Project Plans, Site 35 (Operable Unit 10)

**Responses to Comments Submitted by the
USEPA, Region IV on the Draft Interim RI/FS Project Plan
Operable Unit No. 10, Site 35 - Camp Geiger Area Fuel Farm
Marine Corps Base, Camp Lejeune, North Carolina
Comment Letter Dated July 20, 1993**

Response to General Comments

1. This comment has been addressed in Section 1.1 (Purpose of the Interim RI/FS).
2. As per the previous comment, a brief discussion explaining that a full RI/FS is contemplated and the comprehensive study process has been initiated (i.e., the project plans prepared) has been added to Section 1.1 (Purpose of the Interim RI/FS).
3. Test pits rather than trenches were discussed as a means of obtaining shallow soil samples in the area of the drainage ditches located north of the Fuel Farm and along the southern bank of Brinson Creek. One test pit, however, will be excavated to evaluate site conditions (e.g., flow of free product) during the actual remediation of soil. This information on "actual" site conditions will be useful during the design phase with respect to what may be expected during actual excavation. The Interim Project Plans will be revised to include test pitting/trenching.

Responses to Specific Comments

1. The first part of this comment has been addressed (see Response to General Comments 1 and 2 above). References to "fuel and oil" throughout this document have been changed to the more generic term "petroleum hydrocarbons."
2. The typographical error occurs in the third rather than the second sentence and has been corrected.
3. A statement has been added to Section 3.4 (Sample Analysis and Validation) indicating the rationale for specifying Level III versus Level IV data. This level of QA/QC is deemed appropriate in this case because this data is needed primarily to aid in the evaluation of remedial alternatives. Sufficient Level IV data will be obtained under the site-wide RI/FS to support the risk assessment and provide for the delineation of the extent of contamination.
4. This sentence has been modified in accordance with the comment.
5. The word "conditions" has been replaced with "contamination" in the first sentence.
6. Section 3.13 has been revised to include three projected meetings. The first meeting will be between Baker and LANTDIV to discuss the results of the investigation following the submission of the Draft Interim RI/FS Report. The next two meetings are anticipated to occur on the same day and include a Technical Review Committee (TRC) meeting to present the findings of the Interim RI/FS and a public meeting to present the proposed Interim Remedial Alternative.
7. The second sentence on page 4-1, Section 4.0 has been deleted. Baker concurs that the survey of landfill operators and technology vendors discussed in Section 3.7 (Task 7 - Treatability Study/Pilot Testing) needs to be initiated immediately in the

study so that the knowledge gained from the survey can be used to determine whether or not the data available is sufficient to allow for the evaluation of the applicability/effectiveness and cost of various vendor-supplied technologies. Based on preliminary discussions with one vendor, treatability studies may not be necessary since there are numerous case studies involving the remediation of petroleum contaminated soil. It appears that the proposed sampling program may be sufficient to acquire all necessary information without the need for treatability studies. Nevertheless, additional discussions with technology vendors will be conducted as part of Task 7. Task 7 will be initiated immediately following notice to proceed from LANTDIV.

8. Section 6.2, page 6-2 has been modified to indicate that all soil samples will be homogenized after VOA samples have been segregated and prior to placing them in sample containers for analysis.
9. Extra sampling utensils will be on site such that sufficient time will be available to allow the equipment to air dry.
10. Section 7.1, page 7-1 has been modified to indicate the Level III data goal.
11. The methods identified are correct.

Attachment B
EPA Region IV Comments
on the Draft Interim RI/FS
Project Plans for Site 35 (Operable Unit 10)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JUL 20 1993

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Linda Berry
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1823
Norfolk, Virginia 23511-6287

RE: Marine Corps Base Camp Lejeune NPL Site
Operable Unit 10, Site 35
Jacksonville, North Carolina

Dear Ms. Berry:

EPA has reviewed the document titled "Draft Interim Remedial Investigation/Feasibility Study Project Plan for Operable Unit No. 10 (Site 35)" dated July 2, 1993. EPA comments on the draft document are enclosed.

Overall, the document appears well-written. As agreed in our most recent Remedial Project Manager's meeting, this document will be used to gather a minimal amount of data on a "fast-track" basis to support an interim Record of Decision on the source areas at the site. Review of the comprehensive project plans for the final ROD is underway and will be completed by the Agency in the near future.

If you have any questions or comments, please call me at (404) 347-3016.

Sincerely,

Michelle M. Glenn
Senior Project Manager

Enclosure

cc: Peter Burger, NCDEHNR
Neal Paul, MCB Camp Lejeune

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages 3

To	Van Borch	From	Michelle Glenn
Dept./Agency		Phone #	404 347-3016
Fax #	404 912 269 2002	Fax #	
NSN 7540-01-317 7358		5080-101	
GENERAL SERVICES ADMINISTRATION			

COMMENTS
DRAFT INTERIM RI/FS PROJECT PLANS
Operable Unit Ten
(Site 35)

GENERAL COMMENTS

1. This document should be very clear that its purpose is to gather data to support an interim action on the soils at the site.
2. In line with the previous comment, a brief discussion explaining that a full RI/FS is contemplated and the comprehensive study process has been initiated (i.e. the project plans prepared) is necessary. There should be no doubt in the mind of the reader that the author is aware that additional work is necessary to fully characterize the site.
3. It was my understanding in our last RPM meeting that trenching would be conducted at the site. Why was this not mentioned in the draft interim RI/FS project plans? For the purpose of responding to these comments, any other field activities discussed in the RPM meeting that were not included in the work plan should be explained.

SPECIFIC COMMENTS

1. Page 1-1, Section 1.1 - This would be the appropriate location for clarifying the "scope and role" of this interim RI/FS in relation to the full the final RI/FS.

Also, the reference to just "oil and fuel" should be changed to a more generic term.
2. Page 2-4, Section 2.3 - There appears to be a typographical error in the second sentence.
3. Page 3-3, 2nd paragraph - A statement should be added here that the level III data will be used to support the interim ROD for the soils. Why aren't we using level IV data?
4. Page 3-3, Section 3.5 - This section needs to be clarified as to "interim" versus "final".
5. Page 3-3, Section 3.6 - There is a typographical error in the first sentence. The word "conditions" should be replaced with "contamination" in the first sentence.

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6. Page 3-5, Section 3.13 - Please clarify whether these activities are planned for the interim work or the final RI/FS.
7. Page 4-1, Section 4.0 - There is a typographical error in the second sentence.

We need to decide as early in the process as possible whether or not the treatability studies will be necessary, in order to minimize any potential delays to the process.

8. Page 6-2, Section 6.2 - All soil samples (after the VOAs) should be homogenized prior to placing them in the bottles for analyses.
9. Page 6-2, Section 6.3 - This needs to include procedures in the event insufficient time is available to allow the equipment to air dry.
10. Page 7-1, Section 7.1 - This should reflect the level III not level II goal for data.
11. Page 7-1, Section 7.3 - Please double-check these methods, I don't think they are correct. Isn't EPA Method 3550 for explosives?