

Baker

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August 2, 1994

Commander
 Atlantic Division
 Naval Facilities Engineering Command
 1510 Gilbert Street (Building N-26)
 Norfolk, Virginia 23511-2699

Attn: Ms. Linda Berry, P.E.
 Navy Technical Representative
 Code 1823

Re: Contract N62470-89-D-4814
 Navy CLEAN, District III
 Contract Task Order (CTO) 0246
 Disposal of IDW at Storage Lot 140 and Site 73
 MCB, Camp Lejeune, North Carolina

Dear Ms. Berry:

This correspondence serves to inform you of the status of activities associated with the investigation derived wastes (IDW) at Storage Lot 140 and Site 73, Marine Corps Base (MCB), Camp Lejeune, North Carolina. The field activities were conducted under Contract Task Order (CTO) 0246. Note that Site 73 was not in the original scope of work under the CTO 0246 modification. The following provides a brief description of the field activities conducted and details concerning the disposal or proposed disposal of IDW at Storage Lot 140 and Site 73.

In June of 1994, Baker Environmental, Inc. (Baker) provided oversight for the handling and segregation of Storage Lot 140 IDW. The work was performed by Baker's subcontractor, Four Seasons Environmental Services. The IDW, which was temporarily stored in 55-gallon drums at the lot, was from underground storage tank (UST) site assessments conducted at the Activity. Both liquid and soil IDW were stored in the drums.

Drums of IDW soil were initially segregated into two categories, potentially hazardous and potentially nonhazardous, based on information provided by the Activity. The drums of waste were then emptied into roll-off boxes for temporary storage and to allow for composite sampling. Additionally, drums of IDW liquid were also segregated in a similar manner (i.e., potentially hazardous and potentially nonhazardous) and pumped into on-site tanks for temporary storage and grab sampling. Two roll-off boxes and one tank contained potentially nonhazardous soil and liquid, and two roll-off boxes and one tank contained potentially hazardous soil and liquid following the initial segregation.

Samples of the Storage Lot 140 IDW were collected and submitted for laboratory analysis to determine final disposal options. One representative composite soil sample (comprised of three to five grab samples per box) was submitted from each roll-off box and one grab water sample was submitted from each tanker. Water samples were analyzed for Target Compound List (TCL) volatiles, semivolatiles, and PCBs, Target



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Analyte List (TAL) metals, and RCRA hazardous waste characteristics (corrosivity, ignitability, and reactivity). Potentially hazardous soils were analyzed for TCL volatiles and PCBs, total petroleum hydrocarbons (TPH), and full toxicity characteristic leachate procedure (TCLP) parameters. Potentially nonhazardous soils were analyzed for TCL PCBs, TPH, oil and grease, TCLP metals, benzene, toluene, ethylbenzene, and total xylenes (BTEX). A 14-day laboratory turnaround was requested for all samples to accelerate the disposal process.

Analytical results from Storage Lot 140 IDW soil and liquid indicated the following:

- Toluene (300 J $\mu\text{g}/\text{kg}$), ethylbenzene (2,500 $\mu\text{g}/\text{kg}$), and xylenes (7,200 $\mu\text{g}/\text{kg}$) were detected in one of the potentially hazardous soil samples.
- TPH (range from 420 mg/kg to 910 mg/kg) was detected in both potentially hazardous soil samples. The TPH chromatographs indicated that the fuel type was No. 2 fuel oil in both samples.
- Benzene (580 $\mu\text{g}/\text{kg}$), toluene (1.9 $\mu\text{g}/\text{kg}$ to 13,000 $\mu\text{g}/\text{kg}$), ethylbenzene (2.4 $\mu\text{g}/\text{kg}$ to 5,400 $\mu\text{g}/\text{kg}$), 1,3-dichlorobenzene (1,300 $\mu\text{g}/\text{kg}$), 1,4-dichlorobenzene (31.9 $\mu\text{g}/\text{kg}$ to 6,600 $\mu\text{g}/\text{kg}$), and/or 1,2-dichlorobenzene (14,000 $\mu\text{g}/\text{kg}$) were detected in one and/or both potentially nonhazardous soil samples.
- TPH (670 mg/kg) was detected in one of the potentially nonhazardous soil samples, which was characterized as gasoline fuel.
- Metals and volatiles (toluene, ethylbenzene, and xylenes) were detected in water samples collected from both tankers.
- Water collected from both tankers had flashpoints (ignitability) of less than 140°F, which is below the RCRA Regulatory Level.

In addition to the Storage Lot 140 IDW, LANTDIV requested that Baker dispose of soil and liquid IDW at Site 73, generated during a site assessment conducted by Catlin-Law and Associates. Based on information obtained from LANTDIV and the Activity, the Site 73 IDW soil was analyzed for TPH, ignitability, corrosivity, and semivolatiles; IDW liquid was analyzed for volatiles and semivolatiles. Sample results indicated that the IDW liquids contained low levels of volatiles (BTEX). IDW soils did not contain levels of TPH and were classified as RCRA nonhazardous based on the analytical results.

Additional water samples were collected from both Storage Lot 140 and Site 73 by Baker on July 27 and 28, respectively. The tankers at Storage Lot 140 were resampled for ignitability due to a low flashpoint (less than 140°F) as mentioned above. Ignitability results from the resampling indicated that the liquids were nonhazardous under RCRA. Further, one representative composite sample of water from the Site 73 IDW was collected and submitted for TAL total metals analysis. The initial sampling event conducted by Catlin-Law did not include an analysis of total metals, which is needed to characterize the IDW. Although the additional analyses were performed, Baker does not anticipate a cost overrun for the analytical services.

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Based on the analytical results, soil and water IDW were or will be disposed of by the following manner:

- Approximately 75 cubic yards of soils from Storage Lot 140 and Site 73, classified as being petroleum contaminated, were transported off-site on July 27, 1994 to McGill Environmental in Rose Hill, North Carolina for bioreclamation. The total estimated cost for the soil disposal is \$ 2,000.
- Empty drums (approximately 400 drums) at Storage Lot 140 were taken off-site by Four Seasons Environmental Services for disposal as scrap metal. The total estimated cost for the drum disposal is \$4,000.
- Water and sludge from Storage Lot 140 will be disposed of in an oil/water separator at the Activity. The disposal of the water and sludge will be scheduled through the Activity and is expected to occur within the next two weeks. Approximately 5,400 gallons of water and sludge will be disposed of in the separator.
- Site 73 IDW water, which is contained in 20 55-gallon drums, will be transported and disposed of off-site by Four Seasons Environmental Services. The water will be classified and disposed of as either nonhazardous or hazardous, pending the results of total metals analysis expected to be received by August 29, 1994. Approximately 1000 gallons of water are currently on site. Baker will confer with LANTDIV and the Activity regarding the final disposal of IDW at Site 73 when the results of this analysis are available.

Based on current cost projections, Baker anticipates completing the work within the budget even with the additional work at Site 73.

Baker appreciates the opportunity to provide environmental services to LANTDIV. If you have any questions, please do not hesitate to contact me at (412) 269-2033 or Mr. Raymond Wattras (Activity Coordinator) at (412) 269-2016.

Sincerely,

BAKER ENVIRONMENTAL, INC.



Mr. Richard E. Bonelli
Project Manager

REB/dri

cc: Mr. Neal Paul, MCB, Camp Lejeune
Ms. Lee Anne Rapp, Code 183