



DEPARTMENT OF THE NAVY
NAVY ENVIRONMENTAL HEALTH CENTER
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MCB CAMP LEJEUNE
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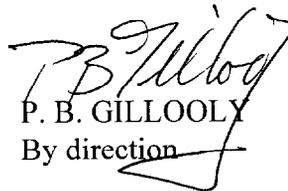
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27 JAN 1999

From: Commanding Officer, Navy Environmental Health Center
To: Commander, Atlantic Division, Naval Facilities Engineering Command (Maritza Montegross), 1510 Gilbert Street, Norfolk, VA 23511-2699
Subj: MEDICAL REVIEW OF DRAFT ENGINEERING EVALUATION/COST ANALYSIS
SITE 84 – BUILDING 45 AREA, MARINE CORPS BASE, CAMP LEJEUNE, NC
Ref: (a) Baker Environmental, Inc. transmittal ltr of 21 Dec 98
Encl: (1) Subject Medical Review
(2) Medical/Health Comments Survey

1. Per reference (a), we have completed a review of the subject document and forward our comments to you as enclosure (1).
2. Please complete and return enclosure (2) as your comments are needed to continually improve our services to you.
3. We are available to discuss the enclosed information by telephone with you and, if you desire, with you and your contractor. If you require additional assistance, please call Mr. William H. Etheridge at (757) 462-5549 or Mr. David McConaughy at (757) 462-5557. The DSN prefix is 253. The e-mail addresses are: etheridgeh@nehc.med.navy.mil and mcconaugyd@nehc.med.navy.mil.


P. B. GILLOOLY
By direction

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**MEDICAL REVIEW OF DRAFT
ENGINEERING EVALUATION/COST ANALYSIS
SITE 84 - BUILDING 45 AREA
MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA**

Ref: (a) Guidance on Conducting Non-Time Critical Removal Actions Under CERCLA, August 1993 (EPA 540-R-93-057)

General Comments:

1. The document entitled "Draft Engineering Evaluation/Cost Analysis, Site 84 - Building 45 Area, Marine Corps Base, Camp Lejeune, North Carolina, Contract N62470-89-D-4814, Delivery Order No. 0314" was provided to the Navy Environmental Health Center for review on 4 January 1999. The report was prepared for the Naval Facilities Engineering Command, Atlantic Division by Baker Environmental, Inc.
2. This Engineering Evaluation/Cost Analysis (EE/CA) was prepared as part of a non-time critical removal action (RA) using U. S. Environmental Protection Agency (USEPA) guidance to identify, evaluate, and select a removal action alternative for Site 84. The EE/CA provided a comparative analysis of five different RA alternatives with subsequent evaluations conducted according to reference (a).
3. We agree that Alternative 4, Coralplex Chemical Dechlorination, is the most direct and cost effective solution for the contaminated soil at Site 84.

Review Comments and Recommendations:

1. Pages ii and iii, "Table of Contents":

Comment: We noted that neither the Table of Contents nor the document contained an Executive Summary. The EE/CA Executive Summary provides a brief discussion of the site, current and potential threats posed by the site, objectives of the removal action and the removal action alternatives, and the recommended removal action alternative. Additionally, the Executive Summary is intended to make the contents of the EE/CA more accessible to review by the public.

Recommendation: Include an EE/CA Executive Summary in the final version of document, as recommended by reference (a).

Enclosure (1)

2. Page 2-1, Section 2.1.1, "Setting":

Comments:

a. In this section, the document mentions that "...15 potable water supply wells have been identified within a one-mile radius of the study area." On page 2-3 we read that rainfall in the Marine Corps Base (MCB), Camp Lejeune area enters the ground in recharge areas, infiltrates the soil, and moves downward until it reaches the surficial aquifer. Though most of the rainfall entering the surficial aquifer discharges to local streams, a relatively small amount infiltrates to the Castle Hayne. The surficial aquifer supplies the primary recharge to the Castle Hayne aquifer, the source of water for the supply wells at MCB, Camp Lejeune.

b. In view of the aforementioned discussion, and the potential for this area to be developed into a recreational park, the document has not clearly defined the impact of the known contaminants at Site 84 on the potable water supply wells within a one-mile radius of the site.

Recommendation: Provide further discussion concerning the potential impact of the contaminants at Site 84 on the potable water supply wells within a one-mile radius of the site.

3. Page 2-2, Section 2.1.2, "History - Site 84":

Pages 6-1 through 6-20, Section 6.0, "Analysis of Removal Action Alternatives":

Comments:

a. Building 45, which is within Site 84, currently contains a 12-inch diameter concrete pipe connected to the oil/water separator located outside of Building 45. Prior to the installation of the oil/water separator, this same concrete pipe was connected directly to the building floor drains. We are assuming that since Building 45 was an enclosed compound used to service large machinery, that some of these previous discharges may have been PCB transformer oil.

b. With the exception of Alternative 5, the remaining alternatives contain the requirement that the 12-inch diameter concrete pipe currently discharging into the southeastern end of the lagoon will be abandoned and that the pipe will not be relocated.

Recommendation: Given that the potential exists for past and current contamination of the concrete pipe on Site 84, discuss the rationale for abandonment and the decision not to relocate this structure.