

Baker

Baker Environmental, Inc.

A Unit of Michael Baker Corporation

Airport Office Park, Building 3
420 Rouser Road
Coraopolis, Pennsylvania 15108

(412) 269-6000
FAX (412) 269-2002

September 10, 1999

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

Attn: Ms. Maritza Montegross
Naval Technical Representative
Code 18233

Re: Contract N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0314
Final Engineering Evaluation/Cost Analysis
Site 85 - The Camp Johnson Battery Dump
MCB, Camp Lejeune, North Carolina

Dear Ms. Montegross:

Baker Environmental, Inc. (Baker) is pleased to submit two (2) copies of the Final Engineering Evaluation/Cost Analysis (EE/CA) for Site 85 - The Camp Johnson Battery Dump at Marine Corps Base (MCB) Camp Lejeune, North Carolina.

Two copies of this document have been forwarded to the Environmental Management Department (EMD) at MCB, Camp Lejeune. In addition, copies have also been provided to each of the following: the U.S. Environmental Protection Agency, Region IV; the North Carolina Department of Environment and Natural Resources (including Mr. David Lown, Mr. Rick Shiver, Mr. Arthur Mouberry, and Ms. Diane Rossi); the Naval Environmental Health Center; and OHM Corporation.

Please note that Table 3-5, "Clean Up Goals Based on RBCs and EPA Recommended Criteria," shows the correct clean up level of 6.2 mg/kg for arsenic. This differs from the arsenic clean up goal presented in the August, 1999 Final OHM Work Plan.



Baker

Ms. Maritza Montegross
September 10, 1999
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Baker appreciates this opportunity to serve LANTDIV. Should you have any questions regarding this document, please feel free to call me at (412) 269-2004, or contact me via e-mail at ccasadei@mbakercorp.com.

Sincerely,

BAKER ENVIRONMENTAL, INC.

Ellen Byerlie Hanna for

Coreen M. Casadei, P.E.
Project Engineer

CMC/lp

cc: Ms. Lee Anne Rapp, P.E. Code 18312 (w/o attachments)
Ms. Beth Collier, Code 02115 (w/o attachments)
Mr. Neal Paul, MCB Camp Lejeune (2 copies)

**USEPA REGION IV COMMENTS OF MARCH 10, 1999
& NAVY RESPONSES
DRAFT ENGINEERING EVALUATION/COST ANALYSIS FOR SITE 85
MCB CAMP LEJEUNE, NORTH CAROLINA**

USEPA Comment #1: "The reports can be finalized for the soil and battery removal, however, the groundwater contamination has not been addressed. Upon review of the information, there is inorganic groundwater contamination that exceeds the Federal and State standards."

Response: *Agreed. Aluminum, cadmium, chromium, iron, lead, manganese, mercury, nickel, and zinc concentrations in groundwater exceeded the North Carolina and/or Federal Maximum Contaminant Levels in groundwater. Upon completion of the removal action, the groundwater at Site 85 will be re-evaluated. Any constituents detected at elevated levels will then be addressed.*

USEPA Comment #2: "It is EPA's understanding that once the source areas are removed the groundwater should return to its natural state. Until this event occurs, institutional controls and a groundwater monitoring (re-sampling) plan should be implemented."

Response: *Agreed. Once the source of contaminants is removed (soil and batteries), the groundwater may return to its normal state. Although groundwater contaminants pose a potential threat to human health, this media will not be further addressed in this document. Upon completion of the removal action, the groundwater at Site 85 will be re-evaluated. Any constituents detected at elevated levels will then be addressed.*

**NAVY ENVIRONMENTAL HEALTH CENTER
COMMENTS OF NOVEMBER 23, 1998
& NAVY RESPONSES
DRAFT ENGINEERING EVALUATION/COST ANALYSIS FOR SITE 85
MCB CAMP LEJEUNE, NORTH CAROLINA**

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

NEHC Comment #1:

Page 6-4, Section 6.2.1, "Description of Alternative"

Pages 3-8 through 3-9, Section 3.1.1.2, "Selection of Chemicals of Potential Concern"

(a) "The text states on page 6-4 that "However, it should be noted that the battery piles are difficult to see at the site and more may be found during the removal action."

(b) "The text states on pages 3-8 through 3-9 that five surface, five subsurface and three groundwater samples were taken."

(c) "Statements in the text indicate that the contaminant sampling was limited and probably all the battery piles were not located at the site."

Recommendation: "Consideration should be given to conducting a more detailed investigation of the site."

Response: The site has been searched by Baker and Navy personnel through multiple site reconnaissance. Through these visual inspections, it is believed that all of the battery piles have now been located. A estimated quantity of 200 cubic yards of batteries have been identified. Removal of these battery piles will also include the excavation of approximately 100 cubic yards of contaminated soil.

NEHC Comment #2:

Page 6-6, Section 6.2.3, "Technical Feasibility"

Page 6-10, Section 6.3.3, "Technical Feasibility"

(a) "Reference (a), page 39, section 2.6 states the short-term effectiveness criterion should address any risk to the affected community that results from implementation of the proposed action, whether from air quality impacts, fugitive dusts, transportation of hazardous materials or other sources. This factor should also assess any threat to site workers and the effectiveness and reliability of protective measures that would be taken."

(b) "The risk to the affected community and to site workers was not adequately addressed in the text."

Recommendation: "The text should explain in more detail the risk from remedial activities to the affected community and to site workers."

Response: *Agreed. Text has been added to explain measures that will be taken to protect the site workers and the community during the implementation of each alternative. However, this text was more appropriately included in the "Protectiveness" discussion of the "Effectiveness" sections of the report (Section 6.2.2 and Section 6.3.2). A comparison of the protectiveness of each alternative with respect to the short-term effects to site workers and the community was also made in Section 7.1.1 of the report.*

**NC SUPERFUND SECTION COMMENTS OF MARCH 17, 1999
& NAVY RESPONSES
DRAFT ENGINEERING EVALUATION/COST ANALYSIS FOR SITE 85
MCB CAMP LEJEUNE, NORTH CAROLINA**

NC Superfund Comment #1: "The groundwater exceeds the North Carolina groundwater standards; a plan for the groundwater remediation needs to be developed. Depending on site-specific conditions, monitored natural attenuation with institutional controls may be appropriate."

Response: *Agreed. Aluminum, cadmium, chromium, iron, lead, manganese, mercury, nickel, and zinc concentrations in groundwater exceeded the North Carolina and/or Federal Maximum Contaminant Levels in groundwater. However, although groundwater contaminants pose a potential threat to human health, this media will not be further addressed in this document. Upon completion of the removal action, the groundwater at Site 85 will be re-evaluated. Any constituents detected at elevated levels will then be addressed. This is reflected by text has been added to the EE/CA.*

NC Superfund Comment #2: "The clean up goals in the Remedial Work Plan should be changed to match the clean up goals in the Action Memorandum and the EE/CA."

Response: *Agreed. However, OHM will address the remediation clean up goals in the Remedial Action Work Plan as they will be finalizing the document.*

NC Superfund Comment #3: "Attached are Dave Lilley's comments on the BRA in the EE/CA and the Final Pre-Remedial Investigation Screening Study."

Response: *These comments will be addressed below.*

David Lilley Comment #1: "Pages 3-7 and 3-11: The screening levels contained within the NC Risk Analysis Framework (RAF) document are DRAFT number and NOT to be used or cited in Risk Assessments or cleanup level determinations. The use of the METHODOLOGIES contained within the RAF is acceptable. It is recommended the RGOs be calculated using the methodologies outlined in the Supplemental Guidance to RAGS: Region 4 Bulletins, Bulletin No. 5, 1995."

Response: *Agreed. All references to the NC Risk Analysis Framework will be removed from text and tables. However, based on discussions between Baker Environmental, Inc. and Mr. David Lown, the final clean up goals were to be chosen between the following RGOs: Region III RBCs multiplied by a factor of 0.2, base background, and Soil Screening Levels (developed from USEPA Soil Screening Guidance, 1996). Therefore, the RGOs will not be recalculated based on the methodologies outlined in Region 4 Bulletin No. 5 (USEPA, 1995).*

Baker

Baker Environmental, Inc.
 420 Rouser Road
 Airport Office Park Bldg. 3
 Coraopolis, PA 15108
 Telephone: (412) 269-6000
 Fax: (412) 269-2002

Letter of Transmittal

To: NC DENR
 Division of Environmental Management
 127 Cardinal Drive Ext.
 Wilmington, NC 28405-3845

S.O. No. 62470-314-SRN
 Project: Site 85
 Date: September 10, 1999

Attn: Mr. Rick Shiver, Regional Supervisor

We are forwarding the following: Attached Under Separate Cover

| DWG. NO. | NO. COPIES | TITLE OR DESCRIPTION | COMMENTS |
|----------|------------|---|----------|
| | 1 | Final Engineering Evaluation/Cost Analysis for Site 85 Marine Corps Base, Camp Lejeune, North Carolina | |

THESE ARE TRANSMITTED as checked below:

- | | | |
|--|---|---|
| <input type="checkbox"/> As requested | <input type="checkbox"/> No exceptions taken | <input type="checkbox"/> Revise and resubmit |
| <input type="checkbox"/> For review and comment | <input type="checkbox"/> Rejected - See remarks | <input type="checkbox"/> Submit specified items |
| <input checked="" type="checkbox"/> For your information | <input type="checkbox"/> Proceed subject to corrections noted | <input type="checkbox"/> _____ |

GENERAL COMMENTS:

cc: Ms. Maritza Montegross, LANTDIV (Code 18233)
 Mr. David J. Lown, L.G., P.E., NC DENR

BAKER ENVIRONMENTAL, INC.

By: Coreen M. Casadei, P.E.

Title: Project Engineer

Page 1 of 1

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Baker Environmental, Inc.
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 Airport Office Park Bldg. 3
 Coraopolis, PA 15108
 Telephone: (412) 269-6000
 Fax: (412) 269-2002

Letter of Transmittal

To: NC DENR - Div. of Environmental Management S.O. No. 62470-314-SRN
 Groundwater Section Project: Site 85
 Parker Lincoln Building - P.O. Box 29758 Date: September 10, 1999
 Raleigh, NC 27626

Attn: Mr. Arthur Mouberry, Section Chief

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GENERAL COMMENTS:

cc: Ms. Maritza Montegross, LANTDIV (Code 18233)
 Mr. David J. Lown, L.G., P.E., NC DENR

BAKER ENVIRONMENTAL, INC.

By: Coreen M. Casadei, P.E.

Title: Project Engineer

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 420 Rouser Road
 Airport Office Park Bldg. 3
 Coraopolis, PA 15108
 Telephone: (412) 269-6000
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Letter of Transmittal

To: Naval Environmental Health Center
 2510 Walmer Avenue
 Norfolk, VA 23513-2617

S.O. No. 62470-314-SRN
 Project: Site 85
 Date: September 10, 1999

Attn: Mr. David McConaughy

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 Mr. David J. Lown, L.G., P.E., NC DENR

BAKER ENVIRONMENTAL, INC.

By: Coreen M. Casadei, P.E.

Title: Project Engineer

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Letter of Transmittal

To: NC DENR - Groundwater Section
 Division of Environmental Management
 127 Cardinal Drive Extension
 Wilmington, NC 28405

S.O. No. 62470-314-SRN
 Project: Site 85
 Date: September 10, 1999

Attn: Ms. Diane Rossi

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cc: Ms. Maritza Montegross, LANTDIV (Code 18233)
 Mr. David Lown, L.G., P.E., NC DENR

BAKER ENVIRONMENTAL, INC.

By: Coreen M. Casadei, P.E.

Title: Project Engineer

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 420 Rouser Road
 Airport Office Park Bldg. 3
 Coraopolis, PA 15108
 Telephone: (412) 269-6000
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Letter of Transmittal

To: NC DENR - Superfund Section
 Division of Solid Waste Management
 P.O. Box 27687 - 401 Oberlin Road
 Raleigh, NC 27605

S.O. No. 62470-314-SRN
 Project: Site 85
 Date: September 10, 1999

Attn: Mr. David J. Lown, L.G., P.E.

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 420 Rouser Road
 Airport Office Park Bldg. 3
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Letter of Transmittal

To: OHM Corporation
 5445 Triangle Parkway
 Suite 400
 Norcross, GA 30092

S.O. No. 62470-314-SRN
 Project: Site 85
 Date: September 10, 1999

Attn: Mr. Jim Dunn

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Letter of Transmittal

To: U.S. EPA - Atlanta Federal Center
 Waste Mngt. Division - Fed. Facilities Branch
 61 Forsyth Stret SW
 Atlanta, GA 30303

S.O. No. 62470-314-SRN
 Project: Site 85
 Date: September 10, 1999

Attn: Ms. Gena Townsend

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**USEPA REGION IV COMMENTS OF MARCH 10, 1999
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