

7/12/02-04583



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 4  
 ATLANTA FEDERAL CENTER  
 81 FORSYTH STREET  
 ATLANTA, GEORGIA 30303-8960

July 12, 2002

Mr. Rodger Jackson  
 Atlantic Division  
 Naval Facilities Engineering Command  
 1510 Gilbert Street  
 Norfolk, Virginia 23511-2699

RE: Final Workplan for Operable Unit 5, Sites 1 and 2  
 Marine Corps Air Station  
 Cherry Point, North Carolina (dated February 2002)

Dear Mr. Jackson:

The above cited workplan describes the proposed field investigation activities to be conducted at Operable Unit 5 (OU5) at Marine Corps Air Station (MCAS) Cherry Point, North Carolina. Overall, the workplan appears adequate for its intended use and is considered acceptable. We offer the following comments for your consideration.

1. Section 7.0 - Quality Assurance Project Plan

This section alludes to Section 3.0 of the Master QAP for MCAS Cherry Point and its Data Quality Objectives (DQOs). Please note that EPA's DQOs' for the management of uncertainty involves these seven (7) steps:

1. State the Problem
2. Identify the Decisions
3. Identify the Inputs
4. Specify the Boundaries
5. Define the Decision Rules
6. Specify Error Tolerances
7. Optimize Sample Design

2. Section 4.0 - Site Specific Work Plan

Section 4.1.3 (Sampling Approach and Sampling Locations) states that "sampling locations were chosen to represent areas of suspected contamination as determined during the site visits." It further states that sixteen surface soil samples and sixteen subsurface soil samples were proposed for OU5. It is important to note that there are several methods to determine the number of samples that may be needed, other than simple random selection. Other designs include a systematic grid with random start, geometric probability of "hot spot" sampling and stratified

random. For clarity, future workplans should provide additional information regarding the decision making process/procedures for determining the number of samples needed.

3.0 Risk Assessment Guidance for Superfund (RAGS), Part D

As of June 10, 2002, Risk Assessment Guidance for Superfund (RAGS): Volume I-Human Health Evaluation Manual (Part D, Standardized Planning, Reporting and Review of Superfund Risk Assessments) Final December 2001, will supersede an interim version published in 1998 and is effective immediately for all new Comprehensive Environmental Response Compensation and Liability Act (CERCLA) risk assessments.

If you have any questions or comments, please feel free to call me at (404) 562-8526 or e-mail me at [thornton.michelle@epa.gov](mailto:thornton.michelle@epa.gov).

Sincerely,

Michelle P. Thornton  
Remedial Project Officer  
U.S. EPA, Region 4