

06.01-04/20/98-01726

(757) 322-4795

5090

18238:TPR:swj

APR 20 1998

U.S. Environmental Protection Agency
Atlanta Federal Center
Attn: Mr. Bassett
61 Forsyth Street
Atlanta, Georgia 30303-3104

Re: Response to comments to Workplan for OU-1, Site 16
and Workplan for OU-2, Site 10

Dear Mr. Bassett:

Enclosed are the Responses to Comments for the subject documents for MCAS Cherry Point. Changes discussed at the March 1998 Cherry Point partnering meeting have been incorporated as requested.

Please contact me at (757) 322-4795 if you have any questions.

Sincerely,

T. P. RIORDAN, P.E.
Remedial Project Manager
Installation Restoration Program
(South)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Enclosures

Blind copy to:
1823
18238 (T. Riordan)
18S
~~Admin Record~~
OU10U2EPA.tpr.doc

RESPONSES TO COMMENTS

February 20, 1998

WORK PLAN FOR OU-1 SITE 16

Comments Received at the October 15-17 Partnering Meeting

MCAS CHERRY POINT, NORTH CAROLINA

1. Correct the date 3rd paragraph for F.S. of OU-1, page 1-3. (EPA)

Response:

Agree. The date of feasibility study was corrected.

2. Section 1.5 – Correct the Target Cleanup Goals Table. (EPA)

Response:

Agree. The corrected Target Cleanup Goals Table is presented in Appendix A.

3. Add “notification to the State Agency,” also in Section 2.3, page 2-1. (State)

Response:

Agree. Notification to North Carolina State DENR has been included.

4. Section 2.4.1.1, page 2-2 – Add, “A copy of the monthly operating report will be sent to the State Agency.” (State) Note: Monthly Report not required submission to EPA.

Response:

Agree. Amendment page to include submission to state agency will be issued.

5. Change to include items in Section 2.4.1.2 into Section 2.4.1.3, page 2-2. (EPA)

Response:

Agree. Items in Post Construction Report to be incorporated into the RAR.

6. Section 2.4.1.3, page 2-3 – Include baseline conditions in report. (EPA)

Response:

Agree. Baseline Condition will be included in the RAR.

7. Update schedule in Work Plan.

Response:

Agree. Updated schedule is provided.

8. **Section 3.3, page 3.1 – Add information on why OHM made changes to the B & R design. (EPA)**

Response:

Agree. Modifications in the original design were suggestions presented by Brown & Root, LANTDIV, and OHM personnel to improve system performance and reduce costs.

9. **Section 3.3, page 3-2 – Add an autodialer or an inspection schedule in the Work Plan. (EPA) Note: OU-2 does not need an autodialer.**

Response:

Agree. Autodialer has been added to system equipment.

10. **Table 3.1, page 3-10 – Make sure changes in design match documentation in Section 3.3 and 3.4. (EPA)**

Response:

Agree. Sections 3.3 and 3.4 will agree in text.

11. **Table 3.4, page 3-13 – State why the action levels for vinyl chloride and others are half the maximum concentration at stack.**

Response:

Agree. Notations to table were added.

12. **Figure 2 and 3 – Include isocon of plume. (State)**

Response:

Agree. Figure 14 has been added to illustrate the isocon of plume.

13. **Figures 2 and 3 – Note in Plan what monitoring wells will be used to monitor the progress of the remedial action.**

Response:

Agree. Sampling of monitoring wells is included in the SAP.

SAMPLING AND ANALYSIS PLAN

1. **Include a map to show the location of the wells that will be monitored. (State)**

Response:

Agree. Included in Figure 2 and 3.

2. Include features on well maps. (State)

Response:

Agree. Included in Figure 2 and 3.

3. Include in evaluation of the data generated from the Monitoring Plan. (State)

Response:

Agree. Evaluation of data will be included.

4. Recommend the following monitoring schedule for data collection and evaluation:

Quarterly for the first two years and annually after that.

Response:

Agree. Sampling of monitoring well will follow a quarterly schedule.

5. Include a means to evaluate the performance of the remedial system (equipment) to address system performance issues and equipment modifications.

Response:

Agree. Sampling of remedial system equipment is included in Table A-1 of SAP.

6. Need to install:

Additional monitoring wells to evaluate the edges of the remedial system to see if the plume is bypassing the remedial curtain. (State)

Response:

Agree. Additional monitoring wells to evaluate the remedial system will be installed at locations to be determined.

7. Add an "Objective" or "Purpose" section to the Plan. (State)

Response:

Agree. The purpose of the Plan is included in Section 1.0.

8. Move the target clean-up levels into the SAP from the Work Plan.

Response:

Agree. Target clean-up levels have been incorporated into the SAP.

9. Note in a Section of the SAP if the Plan has any deviations from EPA Guideline/Requirements. (EPA)

Response:

Agree. All deviations from EPA Guidelines, if any, will be noted in the SAP.

ENVIRONMENTAL PROTECTION PLAN

1. Page 1-3, Section 1-3 – Change background information to match project from OU-2 and OU-1 text.

Response:

Agree. Background information changed.

TRANSPORTATION AND DISPOSAL PLAN

1. Add a statement to the Plan that states “all” waste will be required to be disposed into a CERCLA-approved disposal facility.

Response:

Agree. Notation has been added to Section 1.0.

APPENDIX G

1. Is missing – Add into Plan.

Response:

Agree. Meeting Minutes have been included.

APPENDIX I

1. Remove from Plan – Soil disposal guidelines for Cherry Point not approved by State (as of this date).

Response:

Agree. Soil disposal guidelines have been deleted.

Note from EPA: All comments associated with OU-1 apply to OU-2 also.

RESPONSES TO COMMENTS

February 20, 1998

WORK PLAN FOR OU-2 SITE 10
Comments Received at the October 15-17 Partnering Meeting

MCAS CHERRY POINT, NORTH CAROLINA

1. **Correct Table of Contents – 1.5 and 1.6 are duplicates.**

Response:

Agree. Changes are incorporated.

2. **Page 1.1, Section 1.0 – Change land use restriction from “non-residential” to “industrial.” (State)**

Response:

Agree. Changes are incorporated.

3. **Page 1-2, Section 1.1 – Change F.S. date to July, 1997 and revised R.O.D. to September, 1997. (B & R)**

Response:

Agree. Changes are incorporated.

4. **Section 1.6, Page 1-6 – Use clean-up goals from R.O.D. (State)**

Response:

Agree. Changes are incorporated into the SAP.

5. **Add semi-volatiles to Table of Remediation Goals. (State)**

Response:

Clean-up goals from the R.O.D. have been incorporated and may not include the complete list of semi-volatiles..

6. **Section 2.3, page 2-1 – Add state agency to notification list.**

Response:

Agree. State agency has been included.

7. **Section 2.4.1.3 – State has same comments as in OU-1, modify to match comments in OU-1. (State)**

Response:

Agree. Changes have been incorporated.

8. **Page 3-1, Section 3.3 – Correct conflict in well sizes noted here and in Section 3.4. (State)**

Response:

Agree. Well sizes corrected.

9. **Section 3.4, page 3-3 – Include Figure to show location of hot spot #'s 2, 3 and 5.**

Response:

Agree. Hot Spot locations are indicated in Figure 5.

10. **Section 3.4, page 3-4 – Sampling referred to in paragraph 4 will be adjusted as approved by the State and the EPA; add to text.**

Response:

Agree. Notation will be incorporated into the SAP.

11. **Table 3.1, page 3-7 – Check and correct well sizes in table.**

Response:

Agree. Corrections are incorporated.

12. **Section 5.3.1, page 5-2 – Figure 8.1 is missing.**

Response:

Agree. Changes are incorporated.

13. **Section 5.3.1, page 5-2 – Does OHM's installation diagram cover the locations of the hot spots? (State)**

Response:

Agree. See Figures 2 through 5.

14. **Section 5.3.1, page 5-2 – Wells will be sampled per EPA Method 8081A, 8082, 8260, 8260B, and 8270 (TCL Organics).**

Response:

Agree. Wells will be sampled and tested per methods outlined above and Table A-1 of the SAP will be amended.

15. **Section 5.3.1, page 5-2 – Figure 4-6, not Figure 4-4. (State)**

Response:

Agree. Corrections are incorporated.

16. **Section 5.3.2, page 5-3 – Samples will be tested per EPA Method 8081A, 8082, 8260, 8260B, and 8270 (TCL Organics).**

Response:

Agree. Wells will be sampled and tested per methods outlined above and Table A-1 of the SAP will be amended.

17. **Section 5.3.2, page 5-3 – Include a status of hot spot #3 for closeout sampling. (State)**

Response:

Agree. Notations have been included.

SAMPLING AND ANALYSIS PLAN

1. **Make sure that the sampling program includes samples to evaluate the performance of the remedial system.**

Response:

Agree. Sampling program is outlined in Table A-1.

2. **Table 2.1, page 2-2 – Add semi-volatiles and pesticides.**

Response:

Clean-up goals from the R.O.D. have been incorporated and may not include the complete list of semi-volatiles..and pesticides.

3. **Section 2.2, page 2-2 – Add “confirmation sampling” to area soil verification.**

Response:

Agree. Sampling Summary is also included in Table A-1 of the SAP.

TRANSPORTATION AND DISPOSAL PLAN

1. **Same comments as OU-1.**

Response:

Agree. Changes were incorporated.