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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

May 5, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Ms. Katherine Landman
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1823
Norfolk, Virginia 23511-6287

SUBJECT: Draft RI/FS Project Plans
Operable Units #8, 11, & 12
MCB Camp Lejeune, North Carolina

Dear Ms. Landman:

The Environmental Protection Agency (EPA) has completed its review of the above subject document. Comments are enclosed from the Engineering Services Division (ESD).

If there are any questions or comments, please call me at (404) 347-3016 or voice mail (404) 347-3555 x-6459.

Sincerely,

Gena D. Townsend

Gena D. Townsend
Senior Project Manager

Enclosure

cc: Mr. Neal Paul, MCB Camp Lejeune
Mr. Patrick Watters, NCDEHNR

Comments

1. Section 4.3.5 Investigation Derived Waste Handling (pg 4-13)

   ECB recommends containerization of all investigation derived wastes pending receipt of analytical results. Disposal should be based on presence/absence of contamination in samples from that location.

2. Section 3.5 QA/QC Samples (pg 3-22)

   • ECB recommends a soil trip blank also be utilized. A soil trip blank can be prepared by a laboratory by baking common playground sand at 60°C for at least one hour. Approximately 10 ml of organic-free water should be added after baking. This is for a 2 ounce container.

   • In addition to the QA/QC samples described in this section, preservative blanks should be collected. Preservative blanks are prepared preserving organic-free water with the preservatives used in the field. One preservative blank should be prepared for each bottle of preservative. For example, if two sampling teams use two sets of preservatives, two preservative blanks should be collected. Preservative blanks should be collected at a frequency of one per week or each time new bottles of preservative are used.

3. Section 5.1.2 Soil Borings and Monitoring Well Boreholes (Task at Sites 16, 7, 80, and 3) (pg 5-3)

   Step 1 under "The following procedures are to be used for soil samples submitted to the laboratory:" states "Prior to filling laboratory containers, the soil sample should be mixed in an aluminum tray...". All soil or sediment samples should be homogenized in either stainless steel or glass pans or bowls.

4. Section 5.2 Monitoring Well Installation (Task at Sites 16, 7, 80, and 3) (pg 5-4)

   If PVC is used for well construction materials, ECB recommends the use of pure bentonite grout to reduce the possibility of heat damage occurring while the grout is setting.

5. Section 5.2 Monitoring Well Installation (Task at Sites 16, 7, 80, and 3) (pg 5-7)

   The ninth bullet under the heading "Procedures for the installation and construction of Type II intermediate wells

are presented below:", it is stated the bentonite will be allowed to hydrate for at least 2 hours. The bentonite seal should be allowed to hydrate 8 hours or to the manufacturer's specifications, whichever is greater.

6. Section 5.3.1 Groundwater Samples Collected from Monitoring Wells (pg 5-11)

   Step 9 of this section discusses the collection of filtered metals samples. If filtered groundwater samples are collected, unfiltered samples should also be collected. The project plan should be edited to reflect this. EPA Region IV does not accept data from filtered groundwater samples.

7. Surface Water Sample collection (Task at Sites 16 and 7) (pg 5-12)

   The second paragraph of this section states "For those sample bottles that contain preservative (e.g., sulfuric acid), the water will be collected in a clean, decontaminated sampling container, and then slowly transferred into the appropriate laboratory-supplied sample bottle.". ECB recommends collecting samples directly into the sample container whenever possible. This minimizes the risk of cross-contamination from other sources.

8. Section 5.5 Sediment Sample Collection (Task at Sites 16 and 7) (pg 5-13)

   The sampling procedures describing the collection of sediment samples with a corer state the samples will be transferred directly from the corer to the containers. The samples should be homogenized prior to being transferred to their containers (except VOAs).

9. Appendix K; Section 1.1.1 Cleaning Procedures for Teflon or Glass Field Sampling Equipment used for the Collection of Samples for Trace Organic Compounds and/or Metals Analyses

   Step 3 of the cleaning procedures requires a 10% nitric acid rinse. It should be noted Section B.8 of the Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual, February 1, 1991 (ECBSOPQAM) lists field decontamination procedures. The nitric acid rinse was omitted from the field decontamination procedures due to hazards in transporting it to the field, collection and storage during field operations and the safety of personnel using it.

10. Appendix M; Attachment A; Required Containers, Preservative Techniques and Holding Times (Sampling and Analysis Plan)

- If water samples for volatile organic compounds are not preserved with concentrated hydrochloric acid (HCl), the holding time is reduced to 7 days. Attachment A shows preservation with ice only and a holding time of 14 days. This should be corrected.

- It should be noted in Attachment A that soil samples collected for metals and mercury analyses are not preserved with acids, only cooled to 4°C.

11. Appendix N; Section 1.2.2 Transfer of Custody and Shipment

ECB recommends placing custody seals on individual sample containers that will be shipped to a laboratory via common carrier. If the cooler were opened during shipment (if shipping label was lost, etc.) custody of the samples would be lost and the data would be considered useless.