

State of North Carolina
 Department of Environment,
 Health and Natural Resources
 Division of Solid Waste Management



James B. Hunt, Jr., Governor
 Jonathan B. Howes, Secretary

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 3
To KATHERINE LANDMAN	From PATRICK WATTERS	
Co. LANTDIV	Co. NC-SUPERFUND	
Dept.	Phone # NEW COPY OF OULIO	
Fax # 504-322-4805	Fax # COMMENTS	

October 1, 1993

*Never rec'd original
 - Faxed copy rec'd
 10/19/93
 - Faxed to Baker 10/19/93*

Commander, Atlantic Division
 Naval Facilities Engineering Command
 Code 231

Attention: MCB Camp Lejeune, RPM
 Ms. Linda Berry, P.E.
 Norfolk, Virginia 23511-6287

Commanding General
 Attention: AC/S, Environmental Management
 Building 67, Marine Corps Base
 Camp Lejeune, NC 28542-5001

RE: Draft Remedial Investigation Feasibility Study Work
 Plan, Sampling and Analysis Plan, and Health and
 Safety Plan for Operable Unit #10 (site 35)

The referenced documents have been received and reviewed by
 the North Carolina Superfund Section.

Our comments are attached. Note also that comments on the
 Health and Safety Plan are attached as a memorandum from David
 Lilley our Industrial Hygienist to Peter Burger. Please call me at
 (919) 733-2801 if you have any questions about this.

Sincerely,

Patrick Watters

Patrick Watters
 Environmental Engineer
 Superfund Section

cc: Gina Townsend, US EPA Region IV
 Neal Paul, MCB Camp Lejeune
 Bruce Reed, DEHNR - Wilmington Regional Office

North Carolina Superfund Comments
Camp Lejeune MCB Operable Unit 10 RI/FS Project Plans

RI/FS Work Plan

1. Page 2-17, Section 2.2.4

There are five "bullets" indicating the analyses performed on some of the groundwater samples. Results were indicated (qualitatively) for VOCs but not for the other analyses performed.

2. Page 2-18, Section 2.2.4

The third paragraph indicates that the first area impacted by halogenated organics is south of Fourth Street and east of E Street. Based on Figures 5-1 and 2-5, it appears that the verbal description should indicate west of E Street and not east.

3. Page 2-19, Section 2.2.4

The second paragraph indicates that MTBE was seen in one of the wells in the southern area of the site but was thought to be unrelated to the tank farm. The well that the sample was taken from should be identified and the basis for eliminating the tank farm as the source should also be provided.

4. Page 4-1, Section 4.0

The reference to Section 3.1.6 in the last paragraph probably should be 3.6.1

5. Page 5-8, Section 5.3.5

This section indicates that there are 6 surface water and sediment sampling stations along Brinson Creek however Figure 5-2 only shows 5.

RI/FS Sampling and Analysis Plan

6. Page 3-3, Section 3.1

The RI/FS Work Plan indicates at the bottom of page 5-2 that the sampling points will be on 200 foot centers for the largest area of soil gas and groundwater screening. The description in the Sampling and Analysis Plan does not indicate what spacing is to be used. Also note that the Figure identified as 5-1 in the first paragraph of page 3-3 should probably be 3-1.

7. Page 3-8, Section 3.2.3

The suites of analyses indicated in the Sampling and Analysis Plan for soils is inconsistent with Section 5.3.3 of the Work Plan with regard to pesticides/PCBs and cyanide.

8. Page 3-11, Section 3.3.3

The suites of analyses indicated in the Sampling and Analysis

Plan for the new shallow well groundwater samples is inconsistent with Section 5.3.4 of the Work Plan. The Work Plan calls for TCL organics and TAL inorganics while the Sampling & Analysis plan only indicates VOAs.

9. Page 3-11, Section 3.3.3

The suites of analyses indicated in the Sampling and Analysis Plan for the new deep well groundwater samples is inconsistent with Section 5.3.4 of the Work Plan (page 5-7). The Sampling & Analysis Plan indicates that all samples will be analyzed for VOAs, SVOAs and TAL metals. The Work Plan states that only 2 of the deep wells will be analyzed for full TAL inorganics.

August 25, 1993

TO: Peter Burger

FROM: David Lilley *DBL*

RE: Comments prepared on the Draft Remedial Investigation/Feasibility Study Health and Safety Plan for Operable Unit No. 10 (Site 35), MCB Camp Lejeune, NC

1. Table 3-1: How sure are you of these being the only chemical contaminants present on-site? If the site has been extensively sampled and you are very sure these are the only contaminants present, level C protection may be appropriate. If not, level C will not be appropriate.
2. Page 5-2: Parameters for when to stop work in combustible atmospheres are given. On page 5-1, it is stated breathing zone air will be sampled. Will other areas (such as trenches) be sampled for combustible atmospheres?
3. Page 5-2: It is unclear to the reader what information is being conveyed by differentiating between external and internal probes for radiation survey meters.
4. Appendix A, Safe Boat Operations: "Federal Requirements for Recreational Boats" is not included in this appendix as stated.

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To <i>DAN BOK</i>	From <i>KATE LANDMAN</i>	
Co. <i>BAKER</i>	Co. <i>LANTRDIV</i>	
Dept.	Phone # <i>804 322-4818</i>	
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memo 7671		# of pages ▶
From <i>PATRICK WATERS</i>		
Co. <i>NC-SUPERFUND</i>		
Phone #	<i>ATTACHMENT W/</i>	
Fax #	<i>10/1/93 LETTER</i>	

DAN,

*THIS PAGE WAS NOT INCLUDED WITH
THE NCDENR COMMENTS I FAXED
YOU THIS MORNING.*

- KATE

*✓ faxed
file it.*

DL/dl/wpcomme