03.01-08/15/94-01310

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
William L. Meyer, Director

DEHNR

August 15, 1994

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823-1
Attention: MCB Camp Lejeune, RPM
Ms. Linda Berry, P. E.
Norfolk, Virginia 23511-6287

Commanding General
Attention: AC/S, EMD/IRD
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

RE: Draft RI/FS Project Plans and Health & Safety Plan for Operable Unit 6.

Dear Ms. Berry:

The referenced documents have been received and reviewed by the North Carolina Superfund Section. Our comments are attached. Comments on the Health & Safety Plan are attached as a memo from our Industrial Hygienist to myself. Please call me at (919) 733-2801 if you have any questions about this.

Sincerely,

Patrick Watters

Patrick Watters
Environmental Engineer
Superfund Section

Attachment

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

North Carolina Superfund Comments
Draft RI/FS Project Plan and Health & Safety Plan
Camp Lejeune Operable Unit 6

RI/FS Project Plan

General Comments

1. Geophysics
The RI/FS Project Plan indicates that drums and/or metal debris were found on all sites in Operable Unit 6 except for site 86, yet the project plan does not include provisions for any geophysical investigations. It is reasonable to conclude that there could be buried drums on these sites that have not been detected. It will be difficult to support a conclusion that there are no more buried drums at these dump sites without site specific geophysics data.

2. Analytical method detection limits
Table 8-1 of the OU6 Quality Assurance Project Plan lists the various method performance limits applicable to the analyses performed for OU6. Several of the CRQL performance limits listed for water are higher than the North Carolina 2L groundwater standards. As a result, it is essential that the CRQL performance limits be lowered in order to conclusively show when contaminants are at concentrations below the 2L standards.

3. Groundwater samples for TSS and TDS
Site 54 is the only site within Operable Unit 6 that includes provisions for Total Suspended Solids (TSS) and Total Dissolved Solids (TDS) sampling. Adequate TSS and TDS sampling is essential to resolve the inorganics issue associated with the Camp Lejeune groundwater. There should be representative TSS and TDS samples for all sites within OU 6. Also with regard to site 54, there is only one well that is to be sampled for TDS and TSS. Please provide the rationale for obtaining only one TSS and TDS sample from site 54.

4. Deep wells
The groundwater investigation for sites 43, 44, and 54 includes provisions for only 2, 1, and 0 deep wells respectively. Please provide the rationale to support these sampling schemes. The concern here is having enough data to support conclusions about the degree of contamination in the deep aquifer at these sites.

Specific Comments

5. Page 2-13, Section 2.2.5.1
The last sentence in the second paragraph states that the disposal area extends farther west than was first thought due to the contamination seen in well 36GW04. Figures 3-1 and 3-2 show the site boundary just east of well 36GW04. As a result, it is not clear if the proposed soil sampling and well locations for site 36 (Figures 3-1 and 3-2) adequately investigates all suspected disposal areas.

6. Page 4-11, Test Pit Investigation
Rewrite the last sentence of this section so that odors are not included as a "visual" indication of contamination.

7. Page 4-31, Table 4-5
This table should show the NC groundwater standard for lead as 15 μg/L instead of 50μg/L.

July 28, 1994

TO: Patrick Watters

FROM: David Lilley DBL

RE: Comments prepared on the Draft Remedial Investigation/Feasibility Study Health and Safety Plan for Operable Unit 6 (Sites 36, 43, 44, 54, and 86), MCB Camp Lejeune, NC

After reviewing the above mentioned document, I offer the following comments:

1. Page ES-1: Since the site is located near Jacksonville, NC, heat stress will probably present more of a potential problem than cold stress. It is recommended precautions on how to prevent and treat heat stress related illnesses be added to this safety plan.

2. Page 6-3: How sure are you that the chemicals listed on Tables 3-1 to 3-5 are the only chemical contaminants present in the areas to be investigated? If these areas have been extensively sampled and you are very sure these are the only contaminants present, level C protection may be appropriate in some areas. According to MSA, chemical cartridge respirators should not be used to protect against methylene chloride.

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