03.01-08/03/94-01317

DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1510 GILBERT ST
NORFOLK VA 23511-2699

TELEPHONE NO:
(804) 322-4818

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AUG 03 1994

CERTIFIED MAIL RETURN RECEIPT REQUESTED

North Carolina Department of Environment,
Health, and Natural Resources
Attn.: Mr. Patrick Watters
P.O. Box 27687
401 Oberlin Road
Raleigh, NC 27611

Re: MCB Camp Lejeune, Response to NC DEHNR Comments
Draft RI/FS Project Plans Operable Units 8, 11, and 12
(Sites 3, 7, 16, & 80)

Dear Mr. Watters:

Enclosed are Navy/Marine Corps responses to your comments on the above-referenced documents. The draft final versions of the documents (to be issued August 2, 1994) will incorporate these comments.

Please direct any questions to Ms. Katherine Landman at (804) 322-4818.

Sincerely,

for L. A. BOUCHER, P.E.
Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Enclosure

Copy to:
EPA Region IV (Ms. Gena Townsend)
MCB Camp Lejeune (Mr. Neal Paul)
Baker Environmental, Inc. (Mr. Ray Wattras, Mr. Matt Bartman)
Activity Admin Record File

Response to Comments submitted by State of North Carolina Department of Environmental Health and Natural Resources on the Draft RI/FS Project Plans for Operable Units No. 8, 11, and 12, MCB Camp Lejeune, North Carolina

Comment letter by Mr. Patrick Watters dated June 27, 1994

General Comments

1. This comment will be taken under advisement if a second round of groundwater sampling is required to define a potential inorganics problem at any of the Operable Units.

2. This comment was resolved through a phone conversation between Ms. Katherine Landman of LANDTIV and Mr. Patrick Watters on NC DEHNR.

Specific Comments

3. The NCWQS for copper (1000 ug/L) and chromium (50 ug/L) will be added to this table. The valence for chromium will be presented on the table and the NCWQS for lead will be corrected.

4. In order to be conservative, the PRG for chromium in groundwater will be adjusted to the NCWQS (50 ug/L).

5. There are two general sources of chemical-specific PRGs: (1) concentrations based on ARARs and (2) concentrations based on risk assessment. When ARARs do not exist, risk-based PRGs are calculated using EPA health criteria (i.e., reference doses or cancer slope factors) and default site-specific assumptions. For the groundwater and soil contaminants mentioned in this comment an ARAR has not been established. Additionally, with the exception of anthracene and acenaphthene, EPA has not published health criteria for any of these contaminants. Consequently, a PRG could not be established for these compounds. However, since EPA health criteria is available for anthracene and acenaphthene, these two compounds will be added to Table 2-9 as potential contaminants of concern for soil.

6. During the Sample Strategy Plan meeting held at USEPA Region IV, it was discussed and agreed that materials excavated from test pits/trenches would be screened using a PID and any visual contamination noted. Based on the visual observations and organic vapor readings, potentially contaminated soils would be placed in drums or a roll-off box for subsequent disposal. "Clean" soils will be left onsite. Testing of containerized waste would be performed to satisfy the disposal and handling of any hazardous wastes. Debris encountered during the excavation would

be containerized and disposed of appropriately.

7. The text will be changed to read 6 (six) shallow wells.

8. The subsurface soil contamination at Site 7 was detected in monitoring well boring 07MW02 at a depth of 7.5 to 9.5 feet. The screen for this well was installed from 4 to 14 feet, indicating that the subsurface soil sample with detected pesticides and PCBs was collected below the groundwater table. The validity of soil sample results within the saturated zone is questionable - are the detected contaminants from the soil or the groundwater. Concentrations for the detected pesticides and PCBs at depth were not detected at shallower depths in this boring. It would appear to indicate the detected concentrations are from the groundwater. Subsurface soil samples will be collected just above the groundwater table and at the mid-depth to the ground surface (if depth to groundwater permits a third sample) to characterize subsurface conditions. These depths are variable based on the depth to groundwater.

9. The text will be changed so it reads that the intermediate well will be placed next to shallow well 80MW03.

10. The deep soil contamination at Site 3 was detected in monitoring well boring 03MW02 at a depth of 15 to 17 feet. The screen for this well was installed from 6.8 to 16.8 feet, indicating that the subsurface soil sample with the detected PAHs was collected below the groundwater table. The validity of soil sample results within the saturated zone is questionable - are the detected contaminants from the soil or the groundwater. Since no contaminants were detected above this sample, except from within the surficial soils (0 to 2 feet), it would appear to indicate the detected concentrations are from the groundwater. Subsurface soil samples will be collected just above the groundwater table and at the mid-depth to the ground surface to characterize subsurface conditions. These depths are variable based on the depth to groundwater.

Health and Safety Plan

11. An unexploded ordnance (UXO) contractor will not be required for this investigation. Consequently, text regarding the use of this subcontractor will be removed from the plans.

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