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DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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CERTIFIED MAIL RETURN RECEIPT REQUESTED

Waste Management Division
United States Environmental Protection Agency,
Region IV
Attn: Ms. Gena Townsend
345 Courtland Street N.E.
Atlanta, Georgia 30365

Re: MCB Camp Lejeune, Response to EPA Region IV Comments
Draft RI/FS Work Plan for Operable Unit No. 9

Dear Ms. Townsend:

Enclosed for your review are responses to comments submitted by EPA Region IV on September 28, 1994. Should you have any questions or comments, please contact Ms. Linda Saksvig, P.E. at (804) 322-4793.

Sincerely,

A handwritten signature in cursive script, appearing to read "L. A. Boucher".

for L. A. BOUCHER, P.E.

Head
Installation Restoration Section
(South)
Environmental Engineering Branch
Environmental Quality Division
By direction of the Commander

Enclosure

Copy to (w/encls):

NC DEHNR (Mr. Patrick Watters)

MCB Camp Lejeune (Mr. Neal Paul)

Baker Environmental, Inc. (Mr. Ray Wattras, Mr. Dan Bonk)

Activity Admin Record File

**Response to Comments Submitted by EPA Region IV on the
Draft RI/FS Work Plan for Operable Unit No. 9, MCB Camp Lejeune
Comment Letter Dated September 28, 1994.**

Response to General Comments

1. Section 2.3.1 (Page 2-11) clearly defines the boundary of Site 73. Site 73 encompasses the Amphibious Vehicle Maintenance Area (AVMA) as well as the immediate surrounding area. Approximately 80 percent of the site area is the AVMA complex. Some figures, including Figure 3-2, are titled Amphibious Vehicle Maintenance Area due to the information presented on the figures. These figures will not be changed and do not warrant confusion by the Project Team. Some of the figures were prepared as part of other previous investigations and are included in the Work Plan for convenience without modifying the title.
2. The noted inconsistency regarding the timeframe for allowing the bentonite seal to hydrate has been revised in the SOP to 8 hours.

Response to Specific Comments

1. In some cases, the suite of parameters sampled for during previous investigations was not clearly defined in the background documents (i.e., the background document only detailed what types of contamination were found at the site). Nevertheless, the referenced pages were revised to include the suite of parameters tested for when this information was available.
2. Site 65 is flat. Upon review of CADD drawings, only one contour line was noted. This contour line runs parallel to a roadway. Therefore, this figure was not revised since adding this contour would present no new information.
3. The boundary of Site 73 is clearly defined in the text on Page 2-11. Approximately 95 percent of Figure 2-10 is representative of Site 73; therefore, adding a "boundary line" is not cost effective nor does it present any new information that helps to define the site.
4. Groundwater flow direction throughout the site is believed to vary due to physical features such as site topography and the influence of groundwater discharge areas (e.g., Courthouse Bay, tributaries to Courthouse Bay, etc.). Since no comprehensive study has been conducted over the entire area, groundwater flow direction cannot be accurately predicted. The RI report will provide detailed potentiometric contour lines representing groundwater flow patterns.
5. A background soil database consisting of approximately 25 samples is available for comparing site specific findings to what may be present in background (this comparison is useful primarily for inorganic constituents and pesticides, since pesticides are widespread throughout MCB Camp Lejeune). The 25 samples were collected from areas throughout the base where no known disposal or military operational activity occurred. Therefore, no additional background samples have been proposed.
6. This sentence has been revised to indicate "13" borings.
7. Please see response No. 5, which states why background samples are not necessary.

8. The comment has been incorporated as stated. "Analyte-free/organic free" water will be (as is the current practice) used to prepare equipment rinsate blanks.

9. This definition has been revised. Two field blanks will be collected. One will use analyte-free/organic free water (EPA Region IV requirements). The second blank will be comprised of source water (NEESA requirement).

10. Upgradient well water will be discharged onto the ground. This water is not expected to be contaminated based on the usage of the area where the wells will be installed. If the water is determined to be contaminated, the discharge of this water will not result in additional site risks. Discharged water will infiltrate to the water table, which is only 5 or 10 feet below ground surface. In addition, if groundwater contamination results in excess human health or environmental risks, or if the contaminant concentrations exceed ARARs, then remediation will be evaluated. This is cost effective and in accordance with EPA guidance for IDW management.

11. Disagree with the comment. The comment to containerize all of the IDW is in direct opposition to EPA guidance for IDW management, which stress the minimization of IDW generation. In addition, EPA guidance suggests leaving the IDW at the site where, if necessary, the IDW will be taken care of during remediation.

Previous soil results show so little contamination at Site 65 that containment of soil cuttings, etc. is not cost effective or practical. Backfilling the boreholes or test pits with soil would not result in excess site risks. In addition, if debris is encountered during test pitting, the debris will be removed and properly disposed in accordance with State policy.

With respect to Site 73, backfilling of contaminated soil will not result in additional site risks. It should be noted that areas of contamination that result in excess human health or environmental risks will be required to be remediated in accordance with CERCLA or State law. Therefore, backfilled soil or test pit material will eventually be remediated, if warranted.

With respect to groundwater, the only contamination detected during previous investigations at Site 65 involved metals, which were likely elevated due to suspended solids in the samples (dissolved metals were not elevated). Therefore, to containerize this water would not be cost effective or practical. However, at Site 73, groundwater will be containerized since previous results due indicate significant contamination and discharge of groundwater at Site 73 may result in additional site risks or contamination to soil.

12. Site 65 is level. The CADD drawings of this site only depict one contour line, which is located near the road. Adding this line to the drawing will not result in determining surface water or groundwater contaminant pathways. In addition, the heavy equipment training area is operational and therefore, the topography of much of the study area will change to some degree on a weekly basis. These pathways will be illustrated and discussed in the RI report following additional collection of site information.

13. Unfiltered samples will be collected as they have been for the past four years. Various tables in the FSAP and QAPP indicate that both dissolved and total metals analysis will be performed.

14. A sentence has been added per the comment.

15. The VOA vials are pre-preserved by the laboratory.
16. Although the SOP indicates plastic or stainless, all surface soil samples collected during the investigations at MCB Camp Lejeune are done so using stainless steel trowels.
17. The timeframe noted in the SOP is incorrect and has been marked as "8 hours."
18. The SOP figure has been "marked" to indicate two to three feet. The FSAP text is correct.
19. The comment has been incorporated into SOP 105.
20. EPA Region IV decon procedures are now included in this SOP.

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