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(804) 445-1814

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8 MAY 1991

State of North Carolina
Department of Environment,
Health, and Natural Resources
Attn: Mr. Jack Butler
Division of Solid Waste Management
P.O. Box 27687
Raleigh, North Carolina 27611-7687

Re: Project Plans for Site Inspections for Nine Sites at the
Camp Lejeune Military Reservation

Dear Mr. Butler:

The Atlantic Division, Naval Facilities Engineering Command (LANTNAVFACENGCOM) and Marine Corps Base, Camp Lejeune (MCB Camp Lejeune) have reviewed your comments stated in your letter dated March 18, 1991 to the Camp Lejeune Site Inspection Project Plans. The following is a line by line address of these comments.

- 1) The phone number for the Duke University Poison Information Center will be corrected. In addition, all phone numbers in the Draft Health and Safety Plan will be double checked for accuracy.
- 2) Conditions requiring upgrading of personnel protection to level B and level A will be specified in the Draft Final Health and Safety Plan.
- 3) Three shallow groundwater monitoring wells will be installed at Site 80 (Paradise Point Golf Course) during these Site Inspections. These three wells will be in lieu of three of the seven soil borings identified in the Draft Work Plan. Two soil samples and one groundwater sample will be collected from each well. All samples will be analyzed for TCL organics, TCL inorganics, and cyanide.
- 4) Three shallow groundwater monitoring wells will be installed at the Site 3 (Old Creosote Plant) during these Site Inspections. These three wells will be installed in lieu of the three deep (15') soil borings identified in the Draft Work Plan. Two soil samples and one groundwater sample will be collected from each well. All samples will be analyzed for TCL acid extractables and TCL base/neutral extractables.

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Although we anticipate picking up any creosote-type contaminants (if present) in soil samples due to their low mobility, we agree to investigate the groundwater also due to the potential for migration of these contaminants into this media and the increased possibility for detecting contaminants if present.

5) It will be stated in the Draft Final project plan(s) that all cuttings from wells, well development water, and purge water shall be containerized in labeled 55-gallon drums on-site. The analyses of these drum contents shall be made upon evaluation of Site Inspection data.

We received comments from the North Carolina Division of Environmental Management in a March 22, 1991 letter. These comments are being addressed via this letter through your office. Following is a line by line address of the these comments.

1) The Work Plan will be modified to indicate an action level for soil clean-up of 10 ppm total petroleum hydrocarbon (TPH).

2) TPH is being analyzed only as a screening tool to determine whether soils are contaminated (e.g., containing greater than about 100 mg/kg TPH). TPH results cannot be used in the risk assessment because the results are not chemical-specific and therefore potential risks cannot be underestimated.

The TPH method selected is suitable as an inexpensive screening tool. It will provide general information on whether there is a petroleum hydrocarbon problem in the soil. Other more expensive methods are available that provide more accurate results. When the time comes to delineate quantities of soil for remediation, other analyses, such as PAH will be addressed.

3) The Project Plans shall specify a minimum of 24 hours between well construction/development to well sampling. This is consistent with sampling protocol typically used by EPA and environmental consultants.

The following minor modifications have been made to the Work Plan:

- Site 44 (Jones Street Dump): We have added two surface water/sediment samples to be taken in Edwards Creek just north of the site. These samples will be analyzed for TCL organics, TCL inorganics, and cyanide.

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- Site 63 (Verona Loop Dump): We have decreased the number of surface water/sediment samples from three to two. When the Work Plan was originally developed, surface water was present in depressions in the center of the site. This surface water is no longer present and is not anticipated to be during the time the field work will be conducted. The remaining two surface water/sediment samples will be taken in the creek to the southeast of the site.

- Site 65 (Engineer Area Dump): The number of soil borings is increased from three to five. The number of surface water/sediment samples is decreased from five to three, with one surface water/sediment sample taken from each pond and one in the creek between the ponds.

Further changes are being made to the draft project plans as a result of comments submitted by EPA Region IV. These changes are identified in a letter sent to EPA Region IV on this date. Your office is on distribution for a copy of this letter.

Revised project plans will be forwarded to EPA by May 12, 1991.

We intend to initiate Site Inspection field activities at Sites 3, 7, 54, 80, and 82 by June 10, 1991. Request your office inform us, in writing, by May 22, 1991 of any problems pertaining to the revised project plans.

Our point of contact is Ms. Laurie Boucher, P.E., (804) 445-1814.

Sincerely,

P. A. RAKOWSKI, P.E.
Head
Environmental Programs Branch
Environmental Quality Division
By direction to the Commander

Copy to:
CMC (LFL)
COMNAVFACENGCOM (Code 18)
MCB Camp Lejeune (AC/S, Environmental Management)
EPA Region IV
NC DEHNR Wilmington Regional Office
NUS Corporation (Daryl Hutson)

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