



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

DEC 10 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

Ms. Linda Berry
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1823
Norfolk, Virginia 23511-6287

SUBJ: MCB Camp Lejeune - OU2
Time Critical Removal Action

Dear Ms. Berry:

The Environmental Protection Agency has completed its review of the "Draft Work Plan and Draft Field Sampling Plan for the Drum Removal at Site #6" and comments are enclosed. The documents are written clearly and concisely.

Reports from this removal action should be included in the information repository. If there are any questions or comments, please call me at (404) 347-3016.

Sincerely,

Gena D. Townsend
Senior Project Manager

Enclosure

cc: Mr. Neal Paul, MCB Camp Lejeune
Mr. Patrick Watters, NCDEHNR

Post-It™ brand fax transmittal memo 7671		# of pages ▶ 35
To <i>Kent Geis</i>	From <i>Jim Seifman</i>	
Co. <i>OHM</i>	Co. <i>LANTDIV</i>	
Dept.	Phone # <i>804322-4795</i>	
Fax # <i>919 467-2640</i>	Fax # <i>322-4805</i>	

General Comments

1. The discussion of confirmation sampling is very vague. This sampling is one of the most important activities planned and the results can be used to state positively if any further remediation is required. It is EPA's recommendation that a representative percentage of the samples be analyzed at DQO (Data Quality Objective) level IV for TCL/TAL.

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or before...*

2. What will be the format and contents of the final report?

Specific Comments

Draft Work Plan

1. **Page 3-1, Section 3.0, Paragraphs 2 and 4:** The text should provide a definition for the ROICC and NTR acronyms included in this section.

2. **Page 4-3, Section 4.2.2, Paragraph 3:** The text states that during the site setup and preparation, berms would be constructed of soils utilized from a borrow site located on the facility property. In addition, the text states that the soils from the borrow site are "pre-approved clean". The text should state the location of the borrow site and how the fill is determined to be "clean".

Draft Field Sampling Plan

1. **Figure 2.2, Section 2.1:** The figure does not adequately depict the boundary of Site #6; therefore, the figure should be corrected.

2. **Page 6-2, Section 6.1.2, Item 1:** The text states that once the unearthed drums are monitored with an oxygen meter and a photoionization detector, and the readings are determined to be satisfactory, the samplers may proceed with opening and sampling the drums. Before being opened, the drums should be grounded. In addition, the drums should be opened with spark-proof tools and screened with a flame ionization detector, as per Section 4.12.4 of the ECB SOPQAM.

3. **Page 6-2, Section 6.1.2.2, Item 1:** The specific construction material for the "clean" drum thief should be described in this section.