



03.01-07/20/93-00989

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

JUL 20 1993

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

RE: Marine Corps Base Camp Lejeune NPL Site
Operable Unit 10, Site 35
Jacksonville, North Carolina

Dear Ms. Berry:

EPA has reviewed the document titled "Draft Interim Remedial Investigation/Feasibility Study Project Plan for Operable Unit No. 10 (Site 35)" dated July 2, 1993. EPA comments on the draft document are enclosed.

Overall, the document appears well-written. As agreed in our most recent Remedial Project Manager's meeting, this document will be used to gather a minimal amount of data on a "fast-track" basis to support an interim Record of Decision on the source areas at the site. Review of the comprehensive project plans for the final ROD is underway and will be completed by the Agency in the near future.

If you have any questions or comments, please call me at (404) 347-3016.

Sincerely,

A handwritten signature in cursive script that reads "Michelle M. Glenn".

Michelle M. Glenn
Senior Project Manager

Enclosure

cc: Peter Burger, NCDEHNR
Neal Paul, MCB Camp Lejeune

COMMENTS
DRAFT INTERIM RI/FS PROJECT PLANS
Operable Unit Ten
(Site 35)

GENERAL COMMENTS

1. This document should be very clear that its purpose is to gather data to support an interim action on the soils at the site.
2. In line with the previous comment, a brief discussion explaining that a full RI/FS is contemplated and the comprehensive study process has been initiated (i.e. the project plans prepared) is necessary. There should be no doubt in the mind of the reader that the author is aware that additional work is necessary to fully characterize the site.
3. It was my understanding in our last RPM meeting that trenching would be conducted at the site. Why was this not mentioned in the draft interim RI/FS project plans? For the purpose of responding to these comments, any other field activities discussed in the RPM meeting that were not included in the work plan should be explained.

SPECIFIC COMMENTS

1. Page 1-1, Section 1.1 - This would be the appropriate location for clarifying the "scope and role" of this interim RI/FS in relation to the full the final RI/FS.

Also, the reference to just "oil and fuel" should be changed to a more generic term.
2. Page 2-4, Section 2.3 - There appears to be a typographical error in the second sentence.
3. Page 3-3, 2nd paragraph - A statement should be added here that the level III data will be used to support the interim ROD for the soils. Why aren't we using level IV data?
4. Page 3-3, Section 3.5 - This section needs to be clarified as to "interim" versus "final".
5. Page 3-3, Section 3.6 - There is a typographical error in the first sentence. The word "conditions" should be replaced with "contamination" in the first sentence.

6. Page 3-5, Section 3.13 - Please clarify whether these activities are planned for the interim work or the final RI/FS.
7. Page 4-1, Section 4.0 - There is a typographical error in the second sentence.

We need to decide as early in the process as possible whether or not the treatability studies will be necessary, in order to minimize any potential delays to the process.

8. Page 6-2, Section 6.2 - All soil samples (after the VOAs) should be homogenized prior to placing them in the bottles for analyses.
9. Page 6-2, Section 6.3 - This needs to include procedures in the event insufficient time is available to allow the equipment to air dry.
10. Page 7-1, Section 7.1 - This should reflect the level III not level II goal for data.
11. Page 7-1, Section 7.3 - Please double-check these methods, I don't think they are correct. Isn't EPA Method 3550 for explosives?