

03.1-08/06/93-01004

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AUG 06, 1993

CERTIFIED MAIL RETURN RECEIPT REQUESTED

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

Re: MCB Camp Lejeune; Responses to EPA Region IV Comments on
the Draft Interim RI/FS Project Plan for Operable Unit
No. 10 (Site 35-Camp Geiger Fuel Farm)

Dear Ms. Glenn:

This letter addresses your comments (letter dated July 20, 1993)
on the above referenced project. Navy/Marine Corps responses are
attached.

Any questions concerning these responses should be directed to
Ms. Linda Berry at (804) 322-4793.

Sincerely.

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

Attachment

Copy to:
NC DEHNR (Mr. Peter Burger)
MCB Camp Lejeune (Mr. Neal Paul)

Blind copy to:
1823 (LGB) 2 copies w/encls)
18S
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**Responses to Comments Submitted by the
USEPA, Region IV on the Draft Interim RI/FS Project Plan
Operable Unit No. 10, Site 35 - Camp Geiger Area Fuel Farm
Marine Corps Base, Camp Lejeune, North Carolina
Comment Letter Dated July 20, 1993**

Response to General Comments

- ✓ 1. This comment has been addressed in Section 1.1 (Purpose of the Interim RI/FS).
- ✓ 2. As per 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) has been added to Section 1.1 (Purpose of the Interim RI/FS).
- ✓ 3. Test pits rather than trenches were discussed as a means of obtaining shallow soil samples in the area of the drainage ditches located north of the Fuel Farm and along the southern bank of Brinson Creek. One test pit, however, will be excavated to evaluate site conditions (e.g., flow of free product) during the actual remediation of soil. This information on "actual" site conditions will be useful during the design phase with respect to what may be expected during actual excavation. The Interim Project Plans will be revised to include test pitting/trenching.

Responses to Specific Comments

- ✓ 1. The first part of this comment has been addressed (see Response to General Comments 1 and 2 above). References to "fuel and oil" throughout this document have been changed to the more generic term "petroleum hydrocarbons."
- ✓ 2. The typographical error occurs in the third rather than the second sentence and has been corrected.
- ✓ 3. A statement has been added to Section 3.4 (Sample Analysis and Validation) indicating the rationale for specifying Level III versus Level IV data. This level of QA/QC is deemed appropriate in this case because this data is needed primarily to aid in the evaluation of remedial alternatives. Sufficient Level IV data will be obtained under the site-wide RI/FS to support the risk assessment and provide for the delineation of the extent of contamination.
- ✓ 4. This sentence has been modified in accordance with the comment.
- ✓ 5. The word "conditions" has been replaced with "contamination" in the first sentence.

- ✓ 6. Section 3.13 has been revised to include three projected meetings. The first meeting will be between Baker and LANTDIV to discuss the results of the investigation following the submission of the Draft Interim RI/FS Report. The next two meetings are anticipated to occur on the same day and include a Technical Review Committee (TRC) meeting to present the findings of the Interim RI/FS and a public meeting to present the proposed Interim Remedial Alternative.
- ✓ 7. The second sentence on page 4-1, Section 4.0 has been deleted. Baker concurs that the survey of landfill operators and technology vendors discussed in Section 3.7 (Task 7 - Treatability Study/Pilot Testing) needs to be initiated immediately in the study so that the knowledge gained from the survey can be used to determine whether or not the data available is sufficient to allow for the evaluation of the applicability/effectiveness and cost of various vendor-supplied technologies. Based on preliminary discussions with one vendor, treatability studies may not be necessary since there are numerous case studies involving the remediation of petroleum contaminated soil. It appears that the proposed sampling program may be sufficient to acquire all necessary information without the need for treatability studies. Nevertheless, additional discussions with technology vendors will be conducted as part of Task 7. Task 7 will be initiated immediately following notice to proceed from LANTDIV.
- ✓ 8. Section 6.2, page 6-2 has been modified to indicate that all soil samples will be homogenized after VOA samples have been segregated and prior to placing them in sample containers for analysis.
- ✓ 9. Extra sampling utensils will be on site such that sufficient time will be available to allow the equipment to air dry.
10. Section 7.1, page 7-1 has been modified to indicate the Level III data goal.
11. The methods identified are correct.