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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

May 10, 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

4WD-FFB

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

SUBJ: MCB Camp Lejeune - OU10
Draft Interim Remedial Action

Dear Ms. Landman:

The Environmental Protection Agency (EPA) has partially completed its review of the "Draft Interim Remedial Action, Remedial Investigation/Feasibility Study, Operable Unit 10, Site 35, dated April 5, 1994. The comments from EPA's contractor, Dynamac, are enclosed.

If there are any questions or comments, please call me at (404) 347-3016 or voice mail (404) 347-3555, x-6459.

Sincerely,


Gena D. Townsend
Senior Project Manager

Enclosure

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

1.0 General Comments

The following general comments were developed from review of the Draft Interim Remedial Action RI/FS Report.

1. A summary of previous sampling and analysis data for soil and groundwater and the list of parameters analyzed have not been provided. This information should be provided to indicate the known nature and extent of horizontal and vertical contamination present at the site in order to define site-related data gaps.
2. The laboratory sample analysis forms for the samples collected during the Interim Remedial Action RI/FS should be provided. This would allow the summary data tables to be cross checked against the actual lab analysis forms.
3. The text should state the analytical method used for the oil and grease analysis of soil samples collected during the Interim Remedial Action RI/FS.
4. Inorganic constituents have been detected throughout the soil at Site 35. The text states that slightly elevated levels of inorganic constituents were detected and are believed to be of natural origin. This argument is not justified since inorganic constituents in background samples were either not detected or were present at levels below the concentrations detected in the investigation samples. The text also states that there does not appear to be a significant source of inorganic contaminants in Site 35 soils due to the random distribution of the inorganic constituents and the fact that the concentrations at which these analytes were detected fall within the range of element concentrations detected in soils in the eastern United States. This conclusion is unacceptable. Adequate justification should be presented for the deletion of inorganic constituents from the BRA section of the Interim Remedial Action RI/FS Report.

2.0 SPECIFIC COMMENTS

The specific comments are listed on the following pages. The comments are listed in order of occurrence in the Draft Interim Remedial Action RI/FS Report and are organized by section number, page and paragraph and/or figure and table number, as appropriate.

Remedial Investigation

1. Section 2.3, Page 2-3, Paragraph 2:
The text states, "Results of laboratory analysis revealed that groundwater in one well and soil cuttings from two

borings were contaminated with petroleum hydrocarbons." Summaries of analytical results of previous investigations should be included in the Draft Interim Remedial Action RI/FS Report to support this statement. See General Comment No. 1.

2. Section 2.4, Page 2-4, Paragraph 1:
The text states that soil samples collected during the Comprehensive Site Assessment (CSA) were analyzed for total petroleum hydrocarbons (TPH). The text does not state which portion of the range of TPH constituents was included in the analyses. The text should be revised to state whether the analyses represents the TPH gasoline or diesel range or a combination of the two.
3. Section 2.4, Page 2-4, Paragraph 2:
The text states, "The results of the CSA identified areas of impacted soil and groundwater." Summaries of analytical results of previous investigations should be included in the Draft Interim Remedial Action RI/FS Report to support this statement. See General Comment No. 1.
4. Section 2.4, Page 2-4, Paragraph 4:
The text states that soil samples collected during a followup to the CSA were analyzed for TPH. The text does not state which portion of the range of TPH constituents was included in the analyses. See Specific Comment No. 2.
5. Section 3.1, Page 3-1, Paragraph 4:
The text states, "[Soil Borings] SB-34 and SB-34 were drilled to be downgradient of the Fuel Farm, a suspected source of groundwater contamination." The text should be modified to provide a unique number to each of the soil borings.
6. Section 4.3, Page 4-12, Paragraph 4:
The text states that the detectable levels of oil and grease in soil samples obtained during the Interim Remedial Action RI/FS may be due to the presence of naturally occurring hydrocarbons. This argument is not justified since oil and grease constituents were present at levels below the concentrations detected in the background investigation samples. Adequate justification should be presented for the deletion of oil and grease constituents from the BRA section of the Draft Interim Remedial Action RI/FS Report.
7. Section 5.3, Page 5-2, Paragraph 4:
The text states that inorganic constituents were detected in one or more Interim Remedial Action RI/FS samples and that the occurrence of these constituents does appear to be site related because of the sporadic nature of their detection in

site soils. This conclusion is unacceptable. See General Comment No. 4.

8. Page 6-3, Paragraph 2, Last Sentence:
Regarding using sample prevalence as a screening criterion, the wording that "one positive detection in twenty or fewer environmental samples..." is vague and inconsistent with the statement presented in the preceding sentence. Please revise. A detection frequency of 5 percent requires that at least 20 samples be collected from any single medium.
9. Pages 6-6 through 6-9, Tables 6-1 through 6-3:
Footnotes should be provided for the symbols "J", "K" and "L" used in these tables.
10. Page 6-7, Paragraph 1:
Eliminating bis(2-ethylhexyl)phthalate and di-n-butylphthalate on the basis of these constituents being common laboratory contaminants is not automatically justified unless appropriate screening criteria are met. To be considered a laboratory contaminant, the concentration of a contaminant in an environmental sample should not exceed 10 times the concentration of that contaminant in the associated blank. However, it is unclear from the text whether the proper screening has been conducted. Additionally, no justification is provided in the paragraph regarding the elimination of dibenzofuran. Therefore, a complete rationale should be provided for the deletion of these contaminants as COPCs.

Feasibility Study

12. Section 1.2.5.3, Page 1-5, Paragraph 3:
The text indicates that lead was detected during the confirmation study, but that these concentrations fall within the lead concentrations observed in soils and other surficial material of the eastern United States. See General Comment No. 4.