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(804) 445-2931

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124 MAR 1992

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Jack Butler
North Carolina Department of Environment,
Health, and Natural Resources
Post Office Box 27687
401 Oberlin Road
Raleigh, North Carolina 27611

Re: MCB Camp Lejeune; Responses to North Carolina DEHNR
Comments on the Draft Interim Remedial Action RI, Focused
FS, and Proposed Plan for the Shallow Aquifer at the
Hadnot Point Industrial Area and the Draft RI/FS Project
Plans for Sites 6, 48, and 69

Dear Mr. Butler:

We have received the North Carolina Department of Environment,
Health, and Natural Resources comments (two letters dated January
31, 1992 received in our office February 5, 1992) to the subject
draft documents. The Navy/Marine Corps responses to these
comments are enclosed.

Any questions concerning these responses should be directed to
Mr. Byron Brant at (804)-445-2931.

Sincerely,

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

Enclosure

Copy to:
EPA Region IV (Ms. Michelle Glenn)
MCB Camp Lejeune (Mr. George Radford)

Blind copy to:

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1823 (BCB) (2 copies w/encls)
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ATTACHMENT A

RESPONSE TO COMMENTS NORTH CAROLINA DEHNR LETTER DATED DECEMBER 31, 1991

Draft RI Report for the Shallow Aquifer at HPIA

1. Figure 4-4, which has been revised, may have been misleading with respect to depicting four lead plumes at the HPIA. Based on ES&E's record search and a reconnaissance of the HPIA, the source of the elevated levels of lead in monitoring wells HP-14 and HP-25 could not be determined. Well HP-14 is located near a roadway, adjacent to a parking lot. This well is downgradient from the fuel farm (Site 22). Therefore, the presence of lead may be associated with Site 22 rather than another "unknown" source. Well HP-25 is located in a wooded area adjacent to Sneads Ferry Road just north of the 900 Building Area. Wells in the Building 900 Area exhibited elevated levels of lead. Unfortunately, no soil samples were obtained by ES&E during the installation of monitoring wells. Therefore, no correlation can be made with respect to whether the elevated levels of lead in these wells or other monitoring wells are due to suspended solids in unfiltered samples or whether the elevated levels of lead are due to soil contamination/disposal/spill events. The Navy/Marine Corps will be reassessing shallow soils at the HPIA in the near future. These areas may be investigated as part of this investigation. In addition, another round of groundwater samples may be obtained. Unfortunately, only one round of groundwater samples were obtained for metals analysis. Therefore, conclusions with respect to groundwater metal contamination patterns are difficult to formulate.

2. The sites and areas of concern have been provided on Figure 2-2. They are not shown on Figures 4-1 through 4-4 since the figure would become difficult to interpret.

3. See Response No. 1.

4. See Response No. 1.

Draft FFS Report for the Shallow Aquifer at the HPIA

1. Lead contamination at the HPIA is being accounted for in the development of alternatives. The Navy/Marine Corps is assessing chemical/physical treatment technologies for reducing lead and other metal constituents above State or Federal drinking water standards.

2. The discussion pertaining to the waiver of an NPDES permit has been excluded from the Draft Final FS. Because the discharge to the STP is considered an offsite discharge, all pretreatment requirements need to be met.

3. This technology will be retained for further evaluation. However, the Interim Remedial Action (IRA) Feasibility Study (FS) has been revised to evaluate or carry through the detailed analysis only one biological treatment alternative (trickling filter). The trickling filter technology has been carried through the FS since it is already in place at the HPIA STP.

4. A sentence has been added indicating that the disposal of sludge will need approval by the NC DEHNR prior to disposal.

5. The costs for Alternative 5 will be presented in a table format similar to the other alternatives.

Draft Proposed Plan for the Shallow Aquifer at the HPIA

1. The chemical reduction technology has been described in more detail.

2. The capital costs for Alternatives 2, 3, 4, and 5 are in agreement with the capital costs presented in Section 4.0 of the FS. There may be some confusion with the additional capital costs incurred for the installation of additional extraction wells over a three year period. For example, in the PRAP, the capital cost for Alternative 2 is \$347,500. In the FS, the capital cost is \$310,000 plus \$12,500 for the first three years of operation, which equals \$347,500. The text in the FS (Section 4.0) has been revised to clarify the cost of the alternative.

3. The phone number of the NC DEHNR Superfund Section has been included.

Draft Sampling and Analysis Plan for Sites 6, 48, and 69

1. A list of acronyms has been added. A listing of TCL and TAL constituents is given in the Quality Assurance Project Plan. The FSAP references the QAPP for those who may be interested in the parameters which comprise the lists.

2. PCBs have been added to the list of parameters for both surface water and sediment in Bear Head Creek.

3. These parameters will be added to the sampling and analysis program for wells at Site 6, Lot 201.

4. Surface water and groundwater will be analyzed for full TCL organics and TAL inorganics.

Draft Health and Safety Plan for Sites 6, 48, and 69.

1. It is recognized that Lindane is synonymous with the gamma isomer of hexachlorocyclohexane (HCH); however, during the development of the Health and Safety Plan (HASP), it was assumed that the technical grade pesticide (i.e., lindane), a composition of the alpha, beta, and gamma isomers (Lewis, 1991), was probably the original chemical of use. Therefore, Lindane was chosen since it is the only regulated isomer with a PEL-TWA of 0.5 mg/m³ (OSHA, 1989). The HASP will be modified to reflect these assumptions.
2. Pentachloroethylene will be changed to perchloroethylene.
3. The allowable exposure concentrations outlined under the HNu/OVA section are guidelines based on a potential for exposure to benzene at a PEL of 1 ppm. We agree that Drager tubes do not show fluctuations, but they are chemical-specific, unlike the HNu meter. Also, the separate level of protection guidelines under this section allow for the possibility that a particular constituent of concern may be present that is not detectable or sensitive enough to the HNu or OVA.

The combustible gas meter's intended use, in addition to detecting flammable atmospheres, is that like the drager tubes; to detect hazardous conditions that can not be detected by the HNu or OVA.

We agree that equating levels of protection with a percent of the LEL is not acceptable; therefore, the HASP will be modified so that the combustible gas meter will be used only when an elevated reading is detected by either the HNu or OVA. Additionally, an HNu with an 11.7 eV ultraviolet lamp will be specified to monitor along side the OVA to encompass a broader range of chemicals.

4. The combustible gas meter is intended for drum sampling activities. The HASP will be revised to address the use of the combustible gas meter given an elevated reaction from the HNu or OVA as it applies to intrusive work.
5. This section (Emergency Procedures) will be modified to reflect a blast duration and time interval between long and short blasts.

6. It is agreed that the exact concentrations are not known, however, the following points were considered prior to determining the level of protection:

- The low concentration of contaminants detected previously in the various media;
- The low potential for an inhalation hazard from volatilization of chemicals from either groundwater or surface water; and
- The HEPA respiratory protection available (see Section 7.3) for potential particulate entrainment in the ambient environment that could occur during intrusive work.

To remove apparent inconsistency or vagueness of the respiratory protection specified within the HASP, the sections that pertain to respiratory protection will be revised and consolidated.

ATTACHMENT B

RESPONSE TO COMMENTS ON THE INTERIM ACTION PROPOSED PLAN NORTH CAROLINA DEHNR LETTER DATED JANUARY 31, 1992

1. We do not believe that there are four separate lead plumes at the HPIA, based on the review of background information regarding potential source areas within the HPIA proper. The discussion has been revised to indicate that only two plumes are being addressed at this time until the remainder of the HPIA is completely investigated. The areas where it is suggested by DEHNR that there are two additional sources will be evaluated in an upcoming RI/FS of the HPIA operable unit. It is possible that soil samples need to be obtained from these areas to eliminate (or confirm) them as sources. In addition, only one round of samples were collected for metals analysis. Another round will be collected for comparison purposes.
2. This has been changed to offsite treatment.
3. EPA Region IV has provided the Navy/Marine Corps and their contractor with the format and text of the PRAP. This change will not be made unless directed by EPA Region IV.