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10 MAY 1991

Waste Management Division
U.S. Environmental Protection Agency
Attn: Mr. Carl Froede
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Project Plans for Site Inspections for Nine Sites at the
Camp Lejeune Military Reservation

Dear Mr. Froede:

In reference to your letter dated March 6, 1991, the Atlantic Division, Naval Facilities Engineering Command (LANTNAVFACENGCOM) and Marine Corps Base, Camp Lejeune (MCB Camp Lejeune) have reviewed the Environmental Protection Agency's (EPA) comments to the Camp Lejeune Site Inspection project plans for nine sites. The following is a line by line address of EPA's comments:

A.1) The number of known and potential sites under investigation is currently 34. These have all been accounted for in the Draft Site Management Plan recently submitted to your office for review and comment. To avoid any further confusion, we intend to remove reference to the number of present sites.

A.2) The target compound list of organics and inorganics will be stated in the Draft Final report.

A.3) A reference will be made to what the numbers on the location map mean.

A.4) BTEX is being used strictly as a screening tool. This, in combination with Total Petroleum Hydrocarbons (TPH) analyses, will be adequate to determine whether or not contamination is present.

If benzene is present (as it is found in many types of fuel, such as gasoline and jet fuel), it will drive the risk assessment. Benzene is a Class A carcinogen (known human carcinogen).

The types of PAH's commonly found in fuels are naphthalene and 2-methylnaphthalene. All the other PAH's are relatively insoluble and immobile in the environment. Naphthalene is not a carcinogen, and there are no toxicity data for 2-methylnaphthalene. Therefore, these will not be significant in the risk assessment. The TPH analyses may detect these heavier chain hydrocarbons if they are present. When we know whether or

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not there is a problem, more detailed sampling may be appropriate.

A.5) Existing monitor wells and soil borings will be designated by a symbol different than that used for new wells/borings.

A.6) Complete proposed Applicable, Relevant, and Appropriate Requirements (ARARs) will be stated in the Site Inspection reports, but will not be included in the project plans.

A.7) It will be stated in the appropriate project plan(s) that cuttings from all wells, well development water, and purge water shall be containerized on-site in labeled 55-gallon drums. The analysis of these drum contents shall be made upon evaluation of Site Inspection data.

A.8) A variance request to use PVC as a monitoring well material for these Site Investigations will be included in the Work Plan.

A.9) It will be clarified in the appropriate project plan(s) that surface water samples will be collected from areas of low current velocity and low turbulence to preclude stripping of compounds from the water by aeration.

A.10) It will be clarified in the appropriate project plan(s) that it is not necessary to seal the hole of shallow borings with bentonite unless contamination at the surface is to be kept from spreading to subsurface soils or a landfill cap has been violated and needs to be repaired.

A.11) It will be clarified in the appropriate project plan(s) that the HNU and OVM are appropriate for detecting organics only.

A.12) We intend to obtain unfiltered samples only. This will result in a conservatively biased analytical results. Samples may be obtained both filtered and nonfiltered in future remedial investigation at these sites.

Section 13.3.4. The sketch of a typical monitor well will be corrected.

Section 13.3.5. It shall be stated that no development water will be released to the ground surface and that well development will be containerized in labeled 55-gallon drums.

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Section 13.6. Removal of potential gross decontamination of the drilling rigs/augers will be conducted on-site; decontamination water/muds will be containerized. Final decontamination will be conducted on an existing vehicle washrack equipped with an oil-water separator. Effluent from this oil-water separator discharges to the HPIA sewer system.

Section 13.6.2. As discussed with EPA during the March 21, 1991 meeting at Camp Lejeune, it is acceptable to use deionized water versus organic-free water if equipment is air dried prior to reuse. The project plans will specify under which conditions deionized or organic-free water is to be used. Trip blanks shall be organic-free water.

Appendix A, SA-1.1. Either teflon or stainless steel bailers will be specified.

The following minor modifications have been made to the Work Plan:

- Site 44 (Jones Street Dump): We have added two surface water/sediment samples to be taken in Edwards Creek just north of the site. These samples will be analyzed for TCL organics, TCL inorganics, and cyanide.

- Site 63 (Verona Loop Dump): We have decreased the number of surface water/sediment samples from three to two. When the Work Plan was originally developed, surface water was present in depressions in the center of the site. This surface water is no longer present and is not anticipated to be during at the time the field work will be conducted. The remaining two surface water/sediment samples will be taken in the creek to the southeast of the site.

- Site 65 (Engineer Area Dump): The number of soil borings is increased from three to five. The number of surface water/sediment samples is decreased from five to three, with one surface water/sediment sample taken from each pond and one in the creek between the ponds.

Revised project plans will be forwarded to EPA by May 12, 1991.

We intend to initiate Site Inspection field activities at Sites 3, 7, 54, 80, and 82 by June 10, 1991 in accordance with the revised project plans.

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the Camp Lejeune Military Reservation

Our point of contact is Ms. Laurie Boucher, P.E., (804) 445-1814.

Sincerely,

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

Copy to:
CMC (LFL)
COMNAVFACENGCOM (Code 18)
MCB Camp Lejeune (AC/S, Environmental Management)
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