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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

NOV 18 1985

4PM-EA/WM

Commander
Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511-6287

Attention: J.R. Bailey, P.E.
Environmental Quality Branch

Re: 6280/1143CFB

Dear Sir:

We have received your letter dated October 31, 1985, pertaining to Navy Assessment and Control of Installation Pollutants (NACIP) Phase I reports pertaining to Marine Corps Air Station, Cherry Point (NEESA 13-009) and Marine Corps Base, Camp Lejeune (NEESA 13-011), which you transmitted in May and August 1983, respectively.

Personnel of the U.S. Environmental Protection Agency (USEPA) have recently (October 31, to November 1, 1985) had the opportunity to visit these two installations for the purpose of familiarization with the proposed NACIP sites, and the following comments and observations are offered for your consideration in pursuing the NACIP Phase II Confirmation Studies. We hope that the delay in providing this input will not preclude its consideration.

1. General Comments Applicable to Both Studies

- a. Phase I reports generally propose analytical protocol which are heavily dependent on use of indicator parameters such as Total Valuable Organics, Total Organic Carbon and Total Organic Halides, and other physico-chemical measures in addition to specific chemical species suspected to be present from the available information on past operations. While the USEPA recognizes that such analyses are useful for preliminary screening, or detection of pollutant plumes, or for siting sampling locations, principally due to economic considerations, we feel strongly that they should not be the basis for conclusive decisions that no releases of pollutant exist at a given location.

EPA recommends that at some point in the NACIP Phase II Study, an optimally collected sample(s) of groundwater, soil and/or surface water from each site under investigation be analyzed for all 123 priority pollutants before a final decision is made in the presence or absence of any environmental release from that site.

- b. In designing any confirmatory survey to identify and/or characterize environmental releases from potential uncontrolled hazardous materials disposal sites it is necessary to identify and sample representative background levels of the 123 priority pollutants at representative locations for each environmental media, soil, groundwater and surface water.
- c. The NACIP Phase II studies should contain, or make reference to, sufficient geologic and hydrological data to support conclusions regarding the hydrogeology and drainage of the general area, and to provide a valid assessment of the probable direction of horizontal migration or potential for vertical migration of releases from the sites under investigation. Likewise, where vertical migration in groundwater is contemplated, the design of sampling schemes should take this into consideration.
- d. Where studies indicate significant potential for release, or detect migration of pollutants, it is desirable to collect and include data on potential receptors or populations at risk of exposure in the confirmatory report.

2. Comments Which Pertain Specifically to MCAS Cherry Point

- a. The proposals contained in the NACIP Phase I Study Report (NEESA 13-009) are acceptable, subject to the preceding general comments, however it would be highly desirable to consider the effects of pending RCRA regulation in evaluating future work at Site 10, the Old Sanitary Landfill.
- b. It may prove impractical to attempt to separate the environmental effects of the sludge pits at Site 10 from the effects of other disposals throughout this landfill. Consequently, if the total area of the landfill will be regulated under a RCRA permit or post-closure order, it may be desirable to defer remedial action as the sludge pits alone until the required action for the surrounding area is defined.

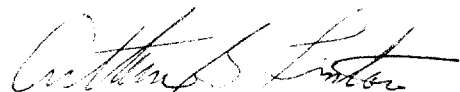
3. Comments Pertaining Specifically to MCS Camp Lejeune

- a. The proposals contained in the NACIP Phase I Study Report (NEESA 13-011) are acceptable, subject to the preceding general comments.
- b. Based on information and preliminary data presented by MCS Camp Lejeune staff during a November 1, 1985, meeting, USEPA believes that there is sufficient data

indicating potential extensive contamination of ground-water in several areas of Camp Lejeune to warrant immediate consideration of this site for inclusion on the National Priority List (NPL). Because of the potential risk to the population dependent on groundwater as a potable water supply at Camp Lejeune, USEPA recommends that further investigation at Camp Lejeune commence as expeditiously as practical; we wish to emphasize that inclusion on the NPL, if supported by available data, should enhance the priority for funding assigned to this facility.

If you have any questions, please do not hesitate to contact me at (404) 881-3776 or FTS 257-3776.

Sincerely yours,



Arthur G. Linton, P.E.
Regional Federal Facilities Coordinator
Environmental Assessment Branch
Office of Policy and Management

cc: Commander, MCAS Cherry Point
Commander, MCS Camp Lejeune
Mr. Carl Zillig, Chief of Naval Operations
LTC Warren Hull, OFA