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UNITED STATES MARINE CORPS
MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA 28542-5001

IN REPLY REFER TO
6286/5
BEMD

JUL 26 1991

From: Commanding General, Marine Corps Base, Camp Lejeune,
North Carolina 28542-5001
To: Commander (Code 1822), Atlantic Division, Naval
Facilities Engineering Command, Norfolk, Virginia 23511
Subj: REVIEW OF REMEDIAL INVESTIGATION REPORT FOR HADNOT POINT
INDUSTRIAL AREA (HPIA)
Ref: (a) ESE Draft Remedial Investigation Report for HPIA

1. Marine Corps Base, Camp Lejeune has reviewed the reference as requested. The following comments are provided for your review:

- The report is very repetitive in stating the same information in several sections. By combining some sections, the report will be much easier for TRC members and the public to review.

- In Appendix G, QA/QC Discussion of Results, variability in duplicate sample results is explained by the amount of sediments in samples from well HPGW-12. Duplicate samples are typically obtained from the same bailer volume as the original samples and at the same time. The fact that one sample is relatively free of sediments and its duplicate contains appreciable sediments indicates possible errors in sampling or handling techniques.

- Section 3.3.3, page 3-15, Item 4a of groundwater sampling techniques states the PVC bailers were dedicated to wells. The report does not state if bailers were maintained above static water level to prevent possible degradation of the PVC by volatile organic compounds in the groundwater. Item 4f should define a "sample tap". It is unclear if this is in reference to the bypass valve at the water supply wells or the bottom drain of a bailer.

- Section 5.2.2, page 5-6 and 5-7, states that acetone and methylene chloride were detected in samples but considered laboratory contaminants. The text does not state whether this artifact was confirmed by the laboratory through validation. These constituents are dismissed throughout the report as laboratory contaminants without laboratory confirmation. Also stated, select metals were detected at concentrations greater than 1,000 ug/kg. This should read mg/kg. This discrepancy is encountered throughout this section.

Encl. (4)

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- Section 5.3.1, pages 5-12, states that certain metals were detected above drinking water standards but does not list concentrations.

- Section 5.3.1, page 5-12 and 5-13, discusses buildings 1709 and 1710 where TCE concentrations found in well HPGW-4 may be related to building 1601 without presenting any evidence. It must be assumed that buildings 1709 and 1710 are downgradient of 1601. This should be clarified.

- Sections 5.3.1, page 5-12, Report states that lead concentrations in Set 1 and 2 are not of concern without providing concentrations (were these concentrations near the MCL or below detectable levels?).

- Section 5.3.1, page 5-13, report indicated that TCE in well HPGW-2 after stating that levels of TCE in water supply well (Well 608) are not from the shallow zone even though HPWG-2 is located near Well 608. This needs to be clarified.

- Section 5.3.1, page 5-14, discusses building 1613 and states some hydrocarbons in shallow groundwater without stating which parameters and their concentrations. Also, lead was not listed as a constituent of concern without provided concentrations or rationale.

- Analytical data from all sampling points should be presented in table form within the main body of the text. Analytical data are only presented in the appendices.

- Comparison of all data in table form from previous sampling efforts to the 1990 sampling effort would be very helpful. The table should also identify MCL's where appropriate. (This might be included in the Risk Assessment).

2. We appreciate the opportunity to review this document and look forward to your submittal or the draft report to EPA in August. If we can be of any further assistance, please call Stephany Del Re'-Johnson, (919) 451-5093.

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Environmental Management
By direction of
the Commanding General