04.01-04/13/93-00922

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

APR 13 1993

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Linda Berry
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1822
Norfolk, Virginia 23511-6287

RE: Marine Corps Base Camp Lejeune NPL Site
Operable Unit 1 - Shallow Aquifer - HPIA
Jacksonville, North Carolina

Dear Ms. Berry:

EPA has reviewed the document titled "Draft Remedial Action Work Plan for the Hadnot Point Industrial Area Shallow Aquifer" and dated March 12, 1993. EPA comments are enclosed.

If you have any questions or comments, please call me at (404) 347-3016.

Sincerely,

Michelle M. Glenn

Michelle M. Glenn
Senior Project Manager

Enclosure

cc: Peter Burger, NCDEHNR
Neal Paul, MCB Camp Lejeune

COMMENTS
DRAFT REMEDIAL ACTION WORK PLAN
HADNOT POINT INDUSTRIAL AREA
SHALLOW AQUIFER

GENERAL COMMENTS

The Draft RA Work Plan is generally well written, but apparently is based on outdated and therefore inappropriate EPA guidance. The Draft RA Work Plan addresses the requirements of Superfund Remedial Design and Remedial Action Guidance (OSWER Directive 9355.0-4A, EPA, 1986). However, the RD and RA Guidance Document cited in Section 1.0 of this TRC Report would be more appropriate. Consequently, the Draft RA Work Plan is incomplete.

The RD and RA Guidance Document contains nine criteria that should be addressed in a Remedial Action Work Plan, none of which are included in the guidance document (Superfund Remedial Design and Remedial Action Guidance) that Baker used to develop the Draft RA Work Plan. Following are the nine criteria, and an assessment of whether the Draft RA Work Plan adequately addresses each criteria:

1. CRITERIA -- Tentative formulation of the Remedial Action Team, including the key personnel, descriptions of duties, and lines of authority in the management of the construction activities.

   COMMENT -- Not addressed in the Draft RA Work Plan.

2. CRITERIA -- Description of the roles and relationships of the (Potentially Responsible Party) PRP, PRP Project Coordinator, Resident Engineer, Independent Quality Assurance Team, Remedial Design Professional, and Remedial Action Constructor.

   COMMENT -- The Draft RA Work Plan refers to an RA "Contractor", as opposed to an RA "Constructor", which the RD and RA Guidance Document refers to. The responsibilities of the RA Contractor are listed on Page 4-1 of the Draft RA Work Plan; however, the roles and relationships of the other participants are not addressed.

3. CRITERIA -- Process for selection of the Remedial Action Constructor.

   COMMENT -- On page 10-1, the Draft RA Work Plan discusses the RA "Contractor" Procurement Phase, not "Constructor."

4. CRITERIA -- Schedule for the Remedial Action and the process to continuously update the project schedule.

COMMENT -- Page 10-2 of the Draft RA Work Plan includes a proposed construction schedule; however, there is no mention of a process to continuously update the project/construction schedule.

5. CRITERIA -- Method to implement the Construction Quality Assurance Plan, including criteria and composition of the Independent Quality Assurance Team.

   COMMENT -- Page 8-1 of the Draft RA Work Plan addresses the components of the site-specific Quality Assurance Project Plan; however, criteria and composition of the Independent Quality Assurance Team are not addressed.

6. CRITERIA -- A Health and Safety Plan for field construction activities.

   COMMENT -- Page 6-1 addresses the components of a Health and Safety Plan.

7. CRITERIA -- Strategy for implementing the Contingency Plan.

   COMMENT -- The Draft RA Work Plan does not address strategy for implementing the contingency plan.

8. CRITERIA -- Procedure for data collection during the Remedial Action to validate the completion of the project.

   COMMENT -- Page 7-1 of the Draft RA Work Plan describes the Sampling and Analysis Plan which includes routine sampling over the duration of the remedial action.

9. CRITERIA -- Requirements for project closeout.

   COMMENT -- Not addressed in the Draft RA Work Plan.

SPECIFIC COMMENTS

1. Page 2-4a, Figure 2-1 - For clarification, a legend should be included with this figure.

2. Page 2-4b, Figure 2.2 - This figure should contain a more comprehensive legend, as some of the symbols in the figure are not defined.

3. Page 2-6, Section 2.5, Paragraph 4 - The text states that "the compound concentrations from the January 1991 data were generally lower than the concentrations identified in the earlier studies." An explanation should be given as to why the concentrations were lower in January 1991 as compared to previous sampling data.

4. Page 3-1, Section 3.1.1, Paragraph 3 - The text states that the recovery wells will be designed to withdraw groundwater "at an assumed rate of approximately 5 [gallons per minute] gpm per well." Since the maximum pumping rate achieved during the aquifer test was 1.5 gpm, it cannot be assumed that 5 gpm will be achieved during operation of the treatment system.

5. Page 3-2, Section 3.1.2, Paragraph 2 - The text refers to a "gravity separation system," yet in paragraph 3 of the same page, the text refers to "oil/water separation." It is not clear if "gravity separation system" is referring to the oil/water separator, or a separate gravity settling tank. Clarification is needed.

6. Page 3-2, Section 3.1.2, Paragraph 2 - The text states that effluent from the "gravity separation system" will be transferred to "an inorganic chemical treatment system for the removal of the inorganic contaminants of concern." However, the next sentence states that "inorganic removal will not be required as a pretreatment step." The two statements are contradictory and should be clarified. Furthermore, based on agreement reached in the 30 Percent Design Review meeting held in Raleigh, North Carolina, on March 23, 1993, inorganic removal will be required as a pretreatment step.

7. Page 3-2, Section 3.1.2, Paragraph 3 - The text states that "additional organic contaminant removal with activated carbon will not be required following air stripping." However, based on agreement reached in the 30 Percent Design Review meeting mentioned in Specific Comment No. 6, carbon adsorption will be required.

8. Page 3-2, Section 3.2, Paragraph 6 - The text refers to the "treatment system operating parameters." Clarify what this term means (i.e., treatment goals or effluent concentrations).

9. Section 3.2 - For clarification, a table should be included listing the treatment system influent concentrations, along with the effluent concentrations.

10. Page 3-3, Table 3-2 - This table should include both primary and secondary drinking water criteria.

11. Page 4-1, Section 4.1, 3rd bullet - The technical requirements of all permits must be met.

12. Page 4-3, Section 4.4 - The last sentence should be clarified.

13. Page 4-4, Section 4.7.1 - EPA and the State of North Carolina should be included in the pre-final inspection.

    Also, as-built drawings should be included on this list.

14. Page 5-2, Table 5-1, Section 8.0 - Shouldn't minimum training requirements for operators be included in this section?