02.01-12/03/93-01041

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary

DEHNR

December 3, 1993

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823-1
Attention: MCB Camp Lejeune, RPM
Ms. Linda Berry, P. E.
Norfolk, Virginia 23511-6287

Commanding General
Attention: AC/S, Environmental Management
Building 67, Marine Corps Base
Camp Lejeune, NC 28542-5001

RE: Draft Work Plan, Field Sampling Plan, Quality Assurance Plan, Site Specific Health & Safety Plan and Final Plans and Specifications for the Time Critical Removal Action at Site 6, Operable Unit 2, Marine Corps Base, Camp Lejeune, NC.

Dear Ms. Berry:

The NC Superfund Section appreciates the opportunity to review and comment on the referenced documents for the Site 6 time critical removal action. Our comments are attached. Note also that the Work Plan was distributed to the NC Division of Environmental Management for their review. Their comments will be provided to you as we receive them. Please call me at (919) 733-2801 if you have any questions about this.

Sincerely,

Patrick Watters

Patrick Watters
Environmental Engineer
Superfund Section

Attachment

cc: Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune

North Carolina Superfund Comments
Time Critical Removal Action for Site 6, Operable Unit 2
Draft Work Plan

1. Page 3-1, Section 3.0
We are unfamiliar with the acronym ROICC. Also, we are assuming that NTR means Navy Technical Representative.

2. Figure 4-1
This figure indicates the cover will be a Permalon 210 liner whereas drawing number 4270694 shows this as simply a 40 mil polyethylene sheeting. Please indicate whether these are equivalent.

3. Page 4-6, Section 4.3
Since we are not very familiar with ordnance surveys, we would like to see more detailed information in the Work Plan on how this is to be conducted.

4. Page 4-13, Section 4.6
NC Superfund recommends that stainless steel samplers be used instead of PVC for drum sampling.

5. Page 5-4, Section 5.6.1
Regarding ambient air monitoring, the NC Superfund Section recommends that you consider including some perimeter air monitoring for selected areas (i.e. at site boundaries and/or downwind locations) in case an abnormal or accident condition causes airborne contamination to migrate beyond controlled areas. Since the operation is close to Holcomb Boulevard and involves volatile contaminants and live ordnance there may be a higher potential for contamination spread in an accident situation.

Field Sampling Plan

6. Page 4-1, Section 4.1
This section indicates that the four open trenches have a collective length of ~230 feet. The Final Plans and Specifications indicates only 141 linear feet. Also, this section of the Field Sampling Plan states that about 38 soil samples will be taken, however we calculate 48 samples based on 16 sampling points (Figure 4.1) and 3 samples per location (walls and the floor or ends of the trench)

7. Page 4-4, Section 4.3
This section states that one waste characterization sample will be collected for every 100 cubic yards of soil. NC Superfund does not think one sample is adequate to characterize such a large amount of soil. We recommend that the number of samples be expanded considerably to provide a higher level of confidence that the soil has been appropriately sampled.

8. Page 4-4, Section 4.3
Does the sampling for decontamination water noted in the third paragraph of this section include the rainwater collected in the 12,000 gallon aboveground temporary pool noted in the Work Plan?

9. Page 4-4 and 4-5, Section 4.4
This section states that one sample each will be collected from the soil, debris and decontamination water wastestream for disposal analysis. Since there is insufficient information on the quantities of these materials expected, we cannot conclusively determine if this amount of sampling is appropriate. Based on the volume of the rainwater holding tank and the estimated quantity of soils to be removed from the trenches, it seems that this level of sampling may not be adequate. See also comment number 7 above.

10. Page 6-1, Section 6.1.1
There is no discussion of how the waste characterization soil samples are to be taken or the location of the designated sample points (i.e. top or bottom, beginning or end of the soil pile, composite sampling, etc.). This section pertains exclusively to the floor and wall sampling in the trenches. See also comment number 7 regarding the concern of characterizing 100 cubic yards of soil with only one sample.

11. Page 6-3, Section 6.1.3.1
There is not enough information on debris sampling to determine if it is adequate.

12. Page 6-4, Section 6.1.4
The concerns noted above on the waste characterization samples apply also to disposal samples.

Quality Assurance Project Plan

13. Figures 2-1 and 2.2
These figures were not included in our copy of the QAPP. Based on the narrative, they are probably the same as Figures 2-1 and 2-2 used in the Field Sampling Plan.

14. Table 5.2
The analyses listed for drums (common waste streams) is different than those noted on Table 7.1 of the Field Sampling Plan.