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UNITED STATES MARINE CORPS
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CAMP LEJEUNE, NORTH CAROLINA 28542-0004

IN REPLY REFER TO:
6287
BEMD

10 JUL 1997

Mr. David Lown
North Carolina Department of Environment,
Health, and Natural Resources
Division of Solid Waste Management
Superfund Section
Post Office Box 27687
Raleigh, North Carolina 27611-7687

Dear Mr. Lown:

The enclosure is submitted as a response to the North Carolina Department of Environment, Health and Natural Resources' comments on the Draft Solid Waste Management Unit (SWMU) Confirmatory Sampling Project Plans dated 15 May 1997. The original project plans were submitted in December 1996.

The point of contact for this matter is Mr. Mick Senus, Installation Restoration Division, Environmental Management Department, at telephone (910) 451-5068.

Sincerely,

N. NEAL PAUL
Acting Deputy Assistant Chief of Staff
Environmental Management
By direction of
the Commanding General

Enclosure: (1) Comments to the Draft SWMU Confirmatory Sampling Project Plans and Health and Safety Plan

Copy to: (w/o encls)
COMLANTNAVFACENGCOM (K. Landman)
EPA, Region 4 (G. Townsend)
NCDEHNR, Hazardous Waste Section (J. Carter)

Comments to the Draft Solid Waste Management Unit (SWMU)
Confirmatory Sampling Project Plans and Health and Safety Plan
Marine Corps Base, Camp Lejeune

General Comments

1. The project scope will be modified for a two-phase approach as requested by North Carolina Department of Environment, Health and Natural Resources (NCDEHNR). The proposed schedules will need to be adjusted to accommodate the additional field time.

2. Section 5 figures for SWMU sites (5-1 through 5-100) will be modified in order to show scale and distances to their respective sampling locations.

The following paragraphs will address each of the proposed goals specified for the SWMU sampling plan by NCDEHNR.

a. The first goal was responded to in the above general comment number 1.

b. The second goal, suggests that angled soil borings be used to obtain representative soil samples. If present, contamination will disperse horizontally as it migrates downward. Detection can be accomplished using traditional drilling techniques (i.e., vertical borings) as proven during numerous past investigations. In addition, utility clearance for angled borings would be much more difficult and risky since there is a margin of error when it comes to predicting the travel path of the drill bit.

c. The third goal is a statement indicating NCDEHNR has guidance available for preparing project plans for confirmatory sampling at SWMUs. The initial guidance provided from NCDEHNR was for the project plans to follow a CERCLA format, however, Baker has secured a copy of this document. The document will be reviewed and used as guidance for revising the Final Project Plans.

d. The fourth goal indicates that samples should be collected on all sides or quadrants of each SWMU and additional samples collected in areas that show evidence of contamination. This may be excessive for confirmatory sampling. The approach that was used during development of the project plans was to select a reasonable number of samples based on photos, notes and observations made during the site visit. If evidence of contamination was noted, a sample was proposed for the area where the evidence was observed. It is believed that the number of samples recommended for each SWMU is adequate to meet the objectives of confirmatory sampling (i.e., to determine if the soils have been contaminated by activities at the unit).

e. The fifth goal eludes that in the case of adjacent SWMUs, one sample between two SWMUs would not be adequate to represent the soil conditions around the units.

However, if the SWMUs are small in size (i.e., an oil/water separator) and relatively close to each other, then the sample would be representative of soil conditions. If the units are not close or if contamination streams per SWMU differ, multiple samples were proposed in the project plans to determine the soil conditions around each of the units. The SWMUs that have a single sample separating two units will be evaluated further to determine if additional samples are necessary. As applicable, additional samples will be added for those units.

f. The final goal provided by NCDEHNR indicates underground piping associated with the SWMUs should be considered and assessed as part of the confirmatory sampling plan. Each SWMU will be re-examined to determine if piping associated with the unit warrants additional samples not presently required in the project plans.

3. The project plans will be modified to delete discussions of groundwater flow until the groundwater investigation phase is carried out in accordance with NCDEHNR comments.

4. The analytical program proposed for the confirmatory sampling at the SWMUs was established after review of the RCRA Facility Assessment (RFA) Report. The set of analytical parameters proposed for each specific unit was based on the suspected contaminants for each SWMU as determined in the RFA Report. If a particular item was noted as the reason for the site to be listed for confirmatory sampling, the sampling should include analytical parameters which would indicate if the observed item had caused environmental impact to the soils. Confirmatory sampling is designed to determine if the environment has been impacted by contaminants contained within the SWMU in question and therefore sampling should be conducted for the most prevalent contaminants for each SWMU. Thus, if a particular dumpster was considered for confirmatory sampling because a number of paint cans were observed during the initial site visit, then it would be reasonable to analyze the samples from this SWMU for VOCs and metals, not SVOCs, PCBs, pesticides and herbicides. No changes to the existing analytical program will be made in the project plans.

5. The SWMUs recommended for no further action (NFA) in the draft project plans will be sampled during the Confirmatory Sampling activities. Specific details and drawings will be included in the Final Project Plans for this investigation.

6. The project plans were formatted in accordance with CERCLA guidance as per direction by the state, which includes the admission of a Health and Safety document. In addition, Section F of the Confirmatory Sampling Workplan Guidance states that a Health and Safety Plan is required for all field activities and should be submitted with the Confirmatory Sampling Work Plan.

7. This unit is being investigated under the IR program (Site 89) and therefore has been excluded from this investigation.

Specific Comments

8. This unit was removed from the Confirmatory Sampling program because it is covered under the LUST program at MCB, Camp Lejeune.

9. A figure will be copied from the RFA report submitted by ENSAFE, Inc. and included in the final version of the project plans.

10. The dotted line indicated the edge of a gravel parking lot. However, the symbol will be clarified in the final version of the work plans.

11. Samples will be collected along the drainage ditch in addition to the existing samples proposed for the site.

12. IDW during the first phase of this investigation will be limited to a very small amount of soil cuttings (suspected to be less than a half drum for the entire investigation) and decontamination fluids. It is proposed that the soil cuttings be used as backfill for the soil borings and the decontamination fluids be treated as hazardous thus eliminating the need for unnecessary analyses and storage of the materials.

13. Appendix IX parameters are not part of the analytical program for this investigation. The PQLs listed on Table 8-1 are correct for the analytical methods proposed for this project.