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United States Environmental Protection Agency
Region IV
Attn.: Ms. Gena Townsend
Atlanta Federal Center
Waste Management Division, Federal Facilities Branch
61 Forsyth St. S.W.
Atlanta, Georgia 30303-3104

Re: MCB Camp Lejeune Draft Focused Remedial
Investigation Report, Operable Unit Number 15
(Site 88) Response to Comments

Dear Ms. Townsend:

Attached are Navy/Marine Corps responses to your comments on the above-referenced document. These comments will be incorporated into the Final version of the document which is scheduled for submittal on April 30, 1998.

Please direct any questions to Ms. Katherine Landman at (757) 322-4818.

Sincerely,

L. G. SAKSVIG, P.E.
Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Attachment

Copy to:

NC DENR (Mr. Dave Lown)

MCB Camp Lejeune (Mr. Mick Senus)

Baker Environmental, Inc. (Mr. Matt Bartman)

**Response to Comments Submitted by the USEPA Region IV
on the Draft Focused Remedial Investigation Report CTO-0356
Operable Unit 15 (Site 88)
MCB Camp Lejeune North Carolina
Comments by Ms. Gena Townsend dated January 30, 1998**

General Comments

1. Section 1.4.3 will be updated to include the work that has been conducted at Site 88 relative to the presence of DNAPL (PCE) at the Site. Additional work has been conducted since the time the draft RI was issued. This work included the initiation of a free-phase DNAPL removal effort.

This section will also include information regarding surfactant-enhanced aquifer remediation (SEAR) activities to be conducted in the late summer/early fall of 1998. SEAR technology is designed to remove the residual-phase DNAPL.

2. Section 1.5 will be revised to discuss the differences between a "focused RI" and an RI.
3. Section 2.2.2 will be revised to provide rationale for not including iron and nickel in the groundwater sampling plan.
4. Section 2.5, paragraph 3 on page 2-10 states that decontamination was performed "in accordance with USEPA Region IV SOPs". The final organic/analyte-free water rinse was inadvertently omitted from the "routine sample collection equipment decontamination" procedures on Page 2-10. "Rinse thoroughly with organic/analyte-free water" will be inserted after the "Rinse with isopropyl alcohol".
5. Section 2.2.2 will be revised to provide rationale why all subsurface soil samples were not analyzed for volatile organic compounds.
6. The RI monitoring well network was designed to detect chlorinated solvents. Chlorinated solvents are denser than water, and will not float if present as an immiscible phase liquid. Accordingly, it was not necessary to screen the shallow wells across the water table. Revisions to the figures are not necessary.
7. Section 4.3 discusses compounds that were detected in blank samples. Acetone, 1,1,1-trichloroethane, and toluene were not detected in any equipment rinsates or laboratory blank samples.
8. There is no evidence that suggests that DNAPL is present in the deep aquifer. It is apparent from the DNAPL investigation that DNAPL has accumulated on a capillary barrier (a silt/clay layer) present at Site 88. Additionally, dissolved contaminant concentrations were detected at only one deep aquifer monitoring well (88-MW05DW) at trace levels.

This issue will be clarified in the Final RI text. Section 1.4.3 will be revised to include information regarding the clayey layer barrier. Further clarification will be provided in the revision to Sections 4.6.1 and 4.6.2 as per comment #9.

9. The discussion of the extent of contamination in Section 4.6.2 will be revised to include the detections of PCE, trans 1,2-DCE, and TCE in the sample from well 88-MW05DW.
10. Conclusion No. 7 will be revised to identify that there is a potential future risk of adverse human health effects.

Specific Comments

1. Section 2.2 will be revised to provide rationale for not collecting surface soil samples at Site 88.
2. A footnote will be added to the end of Table 2-4 that will read: "Dashes indicate that data was not collected for that time." You also state, "This comment also applies to Table 2-6." Since Table 2-6 has no dashes, it appears that you are referring to Table 2-5. A footnote will be added to the end of Table 2-5 that will read: "Dashes indicate that data was not collected for that time."
3. Figures 2-1 through 2-3, and 2-5 through 2-7 will be revised to show the study area boundary.
4. Units are provided at the bottom of the table notes. However, this note will be clarified to read: "Units for SWL are feet and units of SWE are feet above mean sea level". An additional note will be added that will read: "The dashes indicate that an SWE cannot be determined, see note 4."
5. The contour lines on Figure 3-9 are short because the data field is narrow. However, the contour lines on Figure 3-9 will be projected beyond the data field to better illustrate the groundwater potentiometric surface and groundwater flow direction.

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