

Baker

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July 1, 1994

Commander
Atlantic Division
Naval Facilities Engineering Command
1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

Attn: Ms. Linda Berry, P.E.
Code 1823

Re: Contract No. N62470-89-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0249
Final Sample Strategy Plan
RI/FS, Operable Unit No. 9 (Sites 65 and 73)
MCB, Camp Lejeune, North Carolina

1. Need copy of FTA -
2. Petroleum exclusion - cleared Baker?
3. If we did put UST sites into IL program would we use the pertinent portions of the UGS for studying USTs as an ARAA? Should we look into the possibility of delineating our ARAA's up front?

Dear Ms. Berry,

Enclosed please find two advance copies of the Final Sample Strategy Plan for the Remedial Investigation/Feasibility Study (RI/FS) at Operable Unit No. 9 (Sites 65 and 73), MCB Camp Lejeune, North Carolina which have been provided for your review and comment. A copy of this document has also been forwarded to Mr. Neal Paul of MCB, Camp Lejeune, EMD.

Baker Environmental, Inc. (Baker) utilized available background information along with observations obtained during a recent site visit and the results of a preliminary investigation at Site 73 to develop the proposed RI/FS strategy at Sites 65 and 73. Site 73 is particularly noteworthy because of its size (roughly 48 acres), history of past environmental investigations, and overall complexity. Site 73 contains one active UST and several inactive USTs that, for the most part, have been used for the storage of petroleum products. Baker conducted a preliminary investigation at Site 73 which involved a soil gas and groundwater screening survey of the site in an attempt to delineate potential areas of environmental concern.

In addition, the preliminary investigation data was evaluated with respect to determining whether any of the current or former USTs are or were associated with volatile organic contamination. The results of the preliminary investigation and previous investigations performed at Site 73 indicate that only petroleum-based contamination appears to be associated with the majority of USTs. Exceptions include the three former USTs located south of Buildings A1 and A2 where elevated levels of total solvents were identified during the preliminary investigation along with petroleum constituents such as benzene (B), toluene (T), ethylbenzene (E), xylenes (X), and total volatile hydrocarbons (TVHC).

Petroleum exclusion (?)

Good IL study?

would we do a risk assessment?

is the petroleum exclusion still valid under CERCLA? If not, we should probably identify which sites are petroleum contaminated which ones aren't and study under RCRA.



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Baker has proposed in the Final Sample Strategy Plan a comprehensive RI/FS program that considers the entire 48-acre area as a single IR site, including several USTs and other appurtenances such as oil/water separators. This type of comprehensive study is likely to be more cost effective than the combination of an RI/FS focused on the majority of the site and various small UST investigations.

One potential alternative to a full site-wide RI/FS would be to investigate the non-UST areas of the site along with those USTs that are located in areas where solvent plumes were identified during the preliminary investigation. ^{as part of RI/FS program} However, since it is anticipated that petroleum contamination will be detected in non-UST areas, as determined by the preliminary investigation, the process of defining the extent of the contamination may ultimately lead to the investigation of some UST areas anyway.

The third option would be to exclude all of the UST areas from the full site-wide RI/FS on the basis that the USTs are only associated with POL wastes. However, the presence of solvents in the area of the former USTs located south of the Buildings A1 and A2, if verified under an RI/FS, would likely bring these USTs back into the IR program in the future.

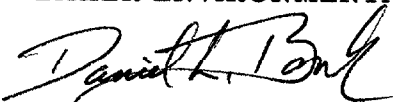
Baker looks forward to discussing these issues during our upcoming review of the Final Sample Strategy Plan scheduled to take place in our office in Coraopolis on July 7, 1994.

In the meantime, if you have any questions or comments please contact me at (412) 269-2063 or Mr. Raymond Wattras, Activity Coordinator, at (412) 269-2016.

Thank you for your continued consideration.

Sincerely,

BAKER ENVIRONMENTAL, INC.



Daniel L. Bonk, P.E.
Project Manager

DLB/jc

cc: Mr. Neal Paul (w/ enclosures)
Ms. Lee Anne Rapp (w/o enclosures)
Ms. Beth Hacic (w/o enclosures)