

Baker

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August 28, 1998

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

Attn: Ms. Katherine Landman
Navy Technical Representative
Code 18232

Re: Contract N62470-D-4814
Navy CLEAN, District III
Contract Task Order (CTO) 0274
Final Amended Proposed Remedial Action Plan
Operable Unit No. 12 (Site 3)
Marine Corps Base, Camp Lejeune, North Carolina

Dear Ms. Landman:

I am pleased to present on behalf of Baker Environmental, Inc. two copies of the Final Amended Proposed Remedial Action Plan (PRAP) for Operable Unit (OU) No. 12 (Site 3), Marine Corps Base (MCB), Camp Lejeune, North Carolina. The Final Amended PRAP incorporates all comments regarding the Draft Amended PRAP. Copies of the Final Amended PRAP have been forwarded as follows:

- MCB, Camp Lejeune (Mr. Mick Senus) - two copies
- USEPA - Region IV (Ms. Gena Townsend) - one copy
- NC DENR (Mr. David Lown) - one copy
- NC DENR (Mr. Rick Shiver) - one copy
- NC DENR (Mr. Arthur Mouberry) - one copy
- NEHC (Ms. Carole Hossum) - one copy
- ATSDR (Mr. David McConaughy) - one copy
- OHM (Mr. James Dunn) - one copy

In addition to the Final Amended PRAP, members of the Restoration Advisory Board (RAB) have each received a Community Information Sheet regarding the new proposed cleanup remedy. The information sheet presents a brief summary of the material presented in the Amended PRAP. A copy and schedule of the 30-day public comment period announcement has also been provided to the RAB members. The announcement will appear in the Jacksonville Daily News Friday, Saturday, and Sunday August 28, 29, and 30, 1998, as well as each day during the week of September 13 through September 19 and again on Sunday September 27, 1998.



A Total Quality Corporation

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Ms. Katherine Landman

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We appreciate the opportunity to serve LANTDIV on this important project. If you have any questions, please contact me at (412) 269-2051 or Jeffrey P. Tepsic (Project Manager) at (412) 269-2055.

Sincerely,

BAKER ENVIRONMENTAL, INC.



Thomas F. Trebilcock
Activity Coordinator

BWP/TFT/lq
Attachments

cc: Ms. Lee Ann Rapp, Code 18312 (letter only)
Ms. Beth Collier, Code 02115 (letter only)
Mr. Mick Senus, MCB, Camp Lejeune (two copies)



You are invited to comment on the Amended Proposed Remedial Action Plan for Operable Unit No. 12 (Site 3) located within Marine Corps Base, Camp Lejeune, North Carolina

In accordance with guidelines established for the U.S. Navy and Marine Corps, the Installation Restoration (IR) Program office at Marine Corps Base (MCB), Camp Lejeune announces the availability for public review and comment the Amended Proposed Remedial Action Plan (PRAP) for Operable Unit (OU) No. 12 (Site 3). The Amended PRAP summarizes information that can be found in greater detail within previous reports and presents the Navy and Marine Corps' preferred remedial alternative for site cleanup.

Site 3 is located 250 feet east of Holcomb Boulevard and consists of approximately 5 acres. A wood treating plant operated at Site 3 during 1951 and 1952. Lumber was treated at Site 3 with creosote, a coal tar based wood preservative. The treated lumber was then used during construction of the Camp Lejeune Railroad. A chimney and several concrete pads are all that remains of the former wood treatment plant today.

The Amended PRAP describes changes to the original remedy presented in the Record of Decision for OU No. 12 (Site 3) and approved in 1997. Results of a treatability study indicate that the original soil cleanup remedy would not be fully effective. Therefore, an alternate soil cleanup remedy is being proposed by the Navy and Marine Corps. Members of the community are being asked to provide comments regarding the new proposed soil cleanup alternative. Community involvement is critical during selection of a final cleanup remedy and may modify the proposed alternative further.

The Amended PRAP and other documentation that pertains to Site 3 is available for public review at the following locations:

Onslow County Library
58 Doris Avenue East
Jacksonville, NC 28540
(910) 455-7350

MCB, Camp Lejeune
Building 58, Room 234 Marine Corps Base
Camp Lejeune, NC 28542
(910) 451-5068

The Amended PRAP can also be found online at: <http://www.bakerenv.com/camplejeune>.

The Navy and Marine Corps will hold a 30-day public comment period beginning August 28, 1998 and extending through September 26, 1998. Public comments are encouraged and will be used in the remedial selection process for OU No. 12 (Site 3). During the comment period any member of the public may request that a meeting be held to review the Amended PRAP for OU No. 12 (Site 3). If requested, the public meeting will be held in Jacksonville on the evening of September 29, 1998. Comments received during the comment period or at the public meeting will become part of the Administrative Record for MCB, Camp Lejeune. Responses to comments will be presented in a Responsiveness Summary and published within the Amended Record of Decision document. The names of those who provide comments will be available through the Freedom of Information Act.

Written comments or requests for a public meeting should be directed to:

Mr. Neal Paul, Commanding General
AC/S EMD (IRD)

Marine Corps Base PSC Box 20004
Camp Lejeune, North Carolina 28542-0004

Voice (910) 451-5068 Fax (910) 451-5997 E-mail pauln@clb.usmc.mil

Display Ad for MCB Camp Lejeune Size: 3 col. wide (4 3/4) by 7.6 inches long
This ad should appear in the Friday, Saturday, and Sunday August 28, 29, 30 1998; again from Sunday September 13 through Saturday September 19, and Sunday September 27, 1998 Jacksonville Daily News, local section
Thanks, Kari Adams, Baker Environmental, Inc. (412) 269-2027

COMMUNITY INFORMATION SHEET
OPERABLE UNIT NO. 12 (SITE 3)
MARINE CORPS BASE, CAMP LEJEUNE, NORTH CAROLINA

This Community Information Sheet presents a brief summary of the material presented in the Amended Proposed Remedial Action Plan (PRAP) for Operable Unit (OU) No. 12 (Site 3). Study results indicate that the original soil cleanup remedy selected for Site 3 would not be effective if fully implemented. Members of the community are now being asked to provide comments regarding an alternate soil cleanup remedy, as presented in the Amended PRAP.

BACKGROUND

In 1951 and 1952 a wood treatment plant operated at Site 3. Treated wood from Site 3 was used to construct the Camp Lejeune Railroad. During the two years of operation, rough-cut lumber was treated with creosote. A coal tar based wood preservative, creosote is distilled from raw coal ore during the production of coke industrial fuel. The liquid creosote presumably ran off concrete drip pads at Site 3 during wood treatment and onto the soil. The liquid creosote then solidified in the subsurface soil. Today, evidence of creosote in the groundwater and soil remains. Several polynuclear aromatic hydrocarbons (PAHs), organic compounds that are constituents of creosote, have been detected among groundwater and subsurface soil samples obtained from the central portion of Site 3.

ASSESSMENT OF SITE RISKS

An assessment of the potential risks to human health if exposed to soil and groundwater at Site 3 was completed using highly conservative state and federal guidelines. Findings from the risk assessment (RA) suggest that no health concerns exist for current military personnel and future construction workers. However, potentially cancerous and noncancerous risks were calculated for possible adult and child residents. If future residents were to ingest or bathe with groundwater from Site 3 over a long period, the likelihood of developing an adverse health condition would increase. Laboratory research has shown that exposure to PAH compounds, like those found in creosote, causes cancer in mice and rats. In addition, other research has demonstrated that long-term exposure to PAH compounds may result in skin disorders and liver disease. It is very unlikely however, that groundwater from the shallow aquifer would be used if Site 3 were developed for residential purposes.

PREFERRED CLEANUP REMEDY

The preferred cleanup remedy for groundwater at Site 3 will remain as presented in original PRAP and Record of Decision (ROD). An aquifer restriction will prohibit future use of groundwater within 1,000 feet of Site 3 and periodic monitoring of the natural contaminant breakdown process will continue. The Navy and Marine Corps are, however, proposing that the original soil cleanup remedy be amended. The preferred soil remedy consisted of removal and on-site biological treatment of soils contaminated with PAH compounds. Biological treatment is simply the introduction of microorganisms that "eat" the offending compounds within an outdoor containment area.

A small-scale study of the biological processes needed to successfully reduce the target contaminants was conducted prior to full-scale implementation of the cleanup remedy. Results from the study suggest that biological treatment is ineffective in reducing PAH soil contamination. The need to pursue an alternate means of soil cleanup arose from the unsatisfactory study results. The new proposed soil cleanup remedy, presented in the Amended PRAP, consists of excavation and disposal of the contaminated soils. Additional testing indicates that the contaminated soil is nonhazardous and, therefore, may be transported to either an on- or off-base permitted landfill. Landfill disposal of the soil will greatly reduce the overall cleanup cost. Removal of the soil is also expected, over time, to reduce contaminants concentrations in the groundwater at Site 3. Based upon this information, the Navy and Marine Corps favor removal and disposal of the soil and welcome your comments regarding the new proposed soil cleanup remedy.

This information sheet is a brief summary of material presented in the Amended PRAP. The Amended PRAP may be obtained at the Onslow County Library or online at the web address: <http://bakerenv.com/camplejeune>.