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**UNITED STATES MARINE CORPS  
Marine Corps Base  
Camp Lejeune, North Carolina 28542-5001**

6286  
BEMD  
20 Aug 90

**From:** Commanding General, Marine Corps Base, Camp Lejeune, North Carolina 28542-5001

**To:** Commander, Atlantic Division, Naval Facilities Engineering Command (Code 18), Norfolk, Virginia 23511-6287

**Subj:** MARINE CORPS BASE CAMP LEJEUNE COMMENTS ON WORKPLAN

**Ref:** (a) Phoncon btwn Mr. Andrew Kissell, LANTDIV and Mrs. Stephany Johnson, BEMD on 13 Aug 90  
(b) US EPA Region IV ltr RCRBFFB dtd 2 Aug 90

**Encl:** (1) MCB CLNC comments on Workplan  
(2) Community Relation Plan comments

1. Per reference (a), Marine Corps Base (MCB) personnel have reviewed reference (b), and our comments are contained in enclosure (1).

2. In addition to enclosure (1), additional comments concerning the Community Relation Plan are contained in enclosure (2).

3. MCB appreciates the opportunity to provide comments to the subject workplan, and if there are any questions, or if any additional information is required, MCB point of contact is Mrs. Stephany Johnson, at telephone (919) 451-5093.



J. I. WOOTEN  
By direction

**COMMENTS ON WORKPLAN**

**Marine Corps Base  
Camp Lejeune, North Carolina**

- Even though the FFA has not been signed, MCB agrees with EPA that all parties involved should meet early on to discuss IR initiatives. It is our belief that such meetings will occur once the FFA comes into existence.

- EPA had agreed to the soil study prior to implementing a remedial action for the shallow aquifer which will be concluded by June 1991. A commitment that funding will be available in June 1991 to initiate a design for the shallow aquifer, as well as a timeline for the completion of the design and initiation of the remedial action needs to be made. In addition, a timeline for completing the studies for the deep aquifer needs to be developed and submitted to EPA.

- MCB has agreed to forward all information concerning the HPPF to EPA. However, all parties need to meet and discuss the possibility of including all UST sites under the FFA if these sites are going to be included under the FFA due to state participation at this point in time.

- MCB should consider additional alternatives in the feasibility study for the clean up of the shallow aquifer since the study of surface soils and the effect the soils have on the shallow aquifer is being performed.

- MCB does not agree with EPA concerning the Risk Assessment. A baseline risk assessment should be conducted and used as part of the decision process.

The following comments relate to EPA's specific comments enclosed in reference (b).

- Section 1.1                    MCB concurs.
- Section 2.1                    Further discussion is needed concerning UST sites before we include the HPPF in the workplan.
- Section 3.1                    MCB concurs.
- Section 3.1                    A proposed plan describing the preferred alternative will be prepared when the draft RI/FS is completed in June 1991.
- Section 4.1                    MCB concurs.
- Section 4.2.1  
(pgs 19-24)                    A reference to the site characterization report should be sufficient.

Section 4.2.1 (pg 19) MCB concurs.

Section 4.2 MCB, Camp Lejeune will provide all information on the HPPF to EPA.

Tables 4-1 through 4-4 MCB concurs.

Section 4.4.1 MCB concurs.

Section 4.4.2 MCB concurs.

Section 4.5 MCB strongly concurs. It should not be that difficult to develop some initial remedial alternatives.

Section 4.5.1 MCB concurs.

Section 4.5.2.5 MCB concurs.

Section 5.1 (pg 39) MCB concurs.

Section 5.1 (pg 39) MCB feels the need for a risk assessment to aid in the determination of a remedial action.

Section 5.1 Even though MCB, Camp Lejeune desires cleanup for these three top priority sites, the DON contract mechanism will not allow for this work to be conducted at this point in time.

Section 6.1 This comment was agreed upon during the 25 July 1990 TRC meeting.

Section 6.1 MCB concurs.

Section 6.2 MCB does not concur with this comment as stated. A risk assessment is necessary.

Section 6.2.3 MCB concurs - provided we can negotiate with the contractor within the Scope of Work any additional work.

Table 6-1 (pg 43) MCB concurs.

Figure 6-1 (pg 44) The Project Operations Plan will provide this information.

Section 6.2.4 (pg 45) A tentative schedule could be set.

Section 6.2.5 (pg 45) Same as Section 6.2.4.

Section 6.2.5 (pg 46) MCB concurs.

Section 6.2.5 (pg 46) This information should be described in the Project Operation Plan versus the workplan.

Section 6.3 and Section 6.4 MCB does not think this proposed work can be conducted underneath a fixed price contract. If the ESE contract could be expanded, we may be able to perform the suggested work. DON should speak with EPA concerning the new clean contracts.

Section 6.4.3 MCB strongly concurs.

Section 6.5 Same as Section 6.3 and 6.4.

Section 6.5.4 MCB concurs.

Section 6.8 MCB concurs.

Section 6.9 Treatability studies were not considered as part of the SOW, and will have to be addressed in a pre design phase.

Section 6.10 Again, this was not originally identified in the SOW. This should be addressed under another contract as soon as the sampling data for these three sites is finalized.

Section 6.11 Same as Section 6.10.

Section 6.12 and Section 6.13 These tasks will be completed by June 1991.

- MCB concurs with the comments on the shallow aquifer, even though the schedule will be tentative. Our contractor is in the process of comparing DON's FSP with EPA Region IV's Operating Procedures and Quality Assurance Manual.