(804) 445-2931

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MAR 26 1993

CERTIFIED MAIL RETURN RECEIPT REQUESTED

United States Environmental Protection Agency, Region IV Waste Management Division Attn: Ms. Michelle Glenn 345 Courtland Street, N.E. Atlanta, Georgia 30365

Re: MCB Camp Lejeune; Responses to EPA Region IV Comments on the Draft Final RI/FS Project Plans for Operable Unit #5 (Site 2)

Dear Ms. Glenn:

We have received your comments (letter dated and received February 11, 1993) to the subject documents. The Navy/Marine Corps responses to these comments are enclosed.

Any questions concerning these responses should be directed to Mr. Byron Brant at (804) 445-2931.

Sincerely,

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

Encl:

Navy and Marine Corps Response to EPA Region IV Comments on the Draft Final RI/FS Project Plans for Operable Unit #5, MCB Camp Lejeune, received via letter dated 11 February 1993

Copy to:
NCDEHNR (Mr. Peter Burger)
MCB Camp Lejeune (Mr. George Radford)
Blind copy to:
18232 (2 copies w/encls), 18S
F:\Admin\Typeout\DFRPRC-4.BCB

Response to Comments

Navy and Marine Corps Response to EPA Region IV Comments on the Draft Final RI/FS Project Plans for Operable Unit #5, MCB Camp Lejeune, received via letter dated 11 February 1993

Response to General Comments - Work Plan

- 1. Figure 2-1 has been revised to include all Installation Restoration Program sites at MCB Camp Lejeune.
- 2. Three additional sampling locations (for full TCL organics/TAL inorganics) have been included north of Building 712, in accordance with the comment (Figure 5-1 and Table 5-1 have been revised along with the text in Section 5.3.2). For the entire operable unit, 16 of the 57 test borings will include full TCL organics and TAL inorganics analysis (surface and subsurface soil samples): Given the small size of the site, sixteen samples is sufficient to characterize potential risks to human health and the environment.

Additional surface water/sediment samples will be analyzed for full TCL organics/TAL inorganics. Figures 5-4 and 5-5 have been revised along with Table 5-1 and Section 5.3.5.

3. Attached to this response summary is a preliminary groundwater contour map. This figure was developed using only one round of groundwater elevations. Groundwater flow direction at Site 2 is reportedly southeast, based on this one round of static water level measurements. Groundwater flow direction needs further evaluation prior to developing final groundwater contour maps. Water level measurements for the site monitoring wells will be recorded periodically during the field investigation phase of the RI. Final Groundwater contour maps will be included in the RI report.

Response to Specific Comments - Work Plan

- 1. Table 2-4 has been revised; the "proposed" designation for barium was eliminated.
- 2. The NCWQS for iron has been revised on Table 2-4.
- 3. See response to General Comment No. 2.

Response to Specific Comments - Sampling and Analysis Plan

- 1. See response to General Comment No. 2.
- 2. See response to General Comment No. 2. In general, the waste handling activities at Site 2 are well documented. Quantities of pesticides used at the site are reported in the Work Plan, based on background information obtained from previous reports/files.

With respect to the comment that previous investigations did not include full analysis, in July 1992 we obtained samples from three of the five monitoring wells for full TCL organics and TAL inorganics analysis prior to developing the RI/FS Work Plan.

- 3. See response to General Comment No. 2.
- 4. Changes to the Sampling and Analysis Plan have been made with respect to the type of water for QA/QC blanks. All blank water will be organic-free and deionized.
- 5. The Navy reserves the right to utilize PVC wells on a case by case basis. Navy/Marine Corps obtained samples from three of the five monitoring wells for full TCL organics and TAL inorganics analysis prior to developing the RI/FS Work Plan. Only low levels of organics were detected. The use of PVC should not result in false positives or false negatives if proper sampling techniques (purging, etc.) are applied.
- 6. Soil cuttings will not be stockpiled onsite. This section has been revised. All soil cuttings will be containerized.
- 7. Section 5.2.1 has been revised in accordance with the comment.

