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Baker

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March 26, 1993

Commander
Atlantic Division
Naval Facilities Engineering Command
Building N-26, Naval Base
Norfolk, Virginia 23511-6287

Attn: Mr. Byron Brant, P.E.
Code 1823

Re: Contract N62470-89-D-4814
Navy CLEAN, District III
CTO-0003, Site Inspections
MCB Camp Lejeune, North Carolina

Dear Mr. Brant:

Attached are the meeting minutes of the March 1, 1993 meeting with the U.S. Environmental Protection Agency, Region IV (EPA), and the North Carolina Department of the Environment, Health, and Natural Resources (DEHNR). These minutes summarize the discussions pertaining to Site Inspections at MCB Camp Lejeune, and expedited actions for RI/FS activities.

I have attached a disc that includes the meeting minutes so that you can add any information you feel is necessary. The file name is "minutes."

If you have any questions, please do not hesitate to contact me at (412) 269-2016.

Sincerely,

BAKER ENVIRONMENTAL, INC.

Raymond P. Wattras
Raymond P. Wattras
Project Manager

RPW/nd
Attachment

cc: Ms. Lee Anne Rapp, Code 183, (without attachment)
Mr. Keith Simmons, P.E., Code 0223 (without attachment)
Ms. Linda Berry, Code 1823
Mr. Neal Paul

MEETING MINUTES
March 1 - 2, 1993

CTO-0003
MCB Camp Lejeune, North Carolina

A meeting was conducted on March 1 and 2, 1993 at EPA Region IV in Atlanta, Georgia. The meeting was conducted to discuss the following: (1) EPA/DEHNR comments to the Draft SI Reports; (2) implementation of Site Inspections at Federal Facilities; and (3) ways to expedite the remediation process at Federal Facilities.

The following representatives of EPA, DEHNR, LANTDIV, MCB Camp Lejeune, and Baker Environmental, Inc. (Baker) were present:

Ms. Linda Berry, LANTDIV
Mr. Byron Brant, LANTDIV
Mr. Laurie Boucher, LANTDIV
Mr. Peter Burger, DEHNR
Ms. Mary Butler, EPA
Ms. Michele Glenn, EPA
Mr. Michael Hartnett, EPA
Mr. Jon Johnston, EPA
Mr. Neal Paul, MCB Camp Lejeune
Mr. Raymond Wattras, Baker

Meeting Minutes - March 1, 1993

The following remarks summarize the discussions and conclusions regarding EPA and DEHNR comments to the Draft SI Reports:

- Site 44 (Jones Street Dump) should continue through the RI/FS stage, based on the types and concentrations of contamination detected at the site.
- The SI report for Site 44 will be changed to recommend that an RI/FS be conducted.
- EPA indicated that more sampling is required at Sites 43 and 63 in order to better characterize the sites. The additional information will be used to determine whether the sites should continue through the RI/FS phase, or be eliminated from the IR program.
- A decision was made to conduct additional sampling at Site 65 rather than conducting an RI/FS.
- Responses to EPA/DEHNR comments should include a discussion of any additional sampling required to better characterize the site.

The following remarks summarize the discussions and conclusions regarding the implementation of site inspections at federal facilities.

- EPA indicated that there is no guidance for conducting SIs at federal facilities. The decision whether a site should continue through the RI/FS stage versus no further action is subjective and professional judgment must be used.

- Mr. Peter Burger indicated that the State would be very flexible on determining the basis of decision.
- In cases where no contamination (or trace levels, i.e., less than 1 ppb) is detected above detectable levels, the basis of decision will be "no further action." No risk assessment will be required in the SI report.
- In cases where low levels of contamination are present (above background), an RI/FS will be required. Additional data will be collected to perform a human health and ecological risk assessment to support the record of decision.
- In cases where contaminant concentrations exceed ARARs or are significantly above background levels (if no ARAR exists), the recommendation should be to proceed with an RI/FS. No risk assessment will be necessary in the SI report.
- In general, the SIs conducted to date at MCB Camp Lejeune do not have sufficient numbers of sampling points. Future SIs should include more sampling points to ensure that the site is adequately characterized.

Meeting Minutes - March 2, 1993

The following remarks summarize the discussions and conclusions regarding expedited site investigations/remedial action.

- EPA remarked that the progress of work at MCB Camp Lejeune is very good and that certain actions have already resulted in expediting the RI/FS schedule. In addition, EPA stated that certain aspects of the remedial process are mandated under law (e.g., public comment period, development of certain documents, etc.) and may not be subject to streamlining.
- Baker will look into standardizing portions of the Health and Safety Plans so that the review process can be streamlined.
- Baker will look into providing standard operation procedures in the Project Plans to streamline the review process. However, the format of the Project Plans will not be changed. A Work Plan, Sampling and Analysis Plan, and a Health and Safety Plan will be submitted as "stand alone" documents.
- A preface will be included in the Project Plans stating that the procedures referenced in the plans are based on comments previously submitted by EPA and the DEHNR.
- Preliminary Draft versions of the Project Plans will be eliminated.
- Neal Paul will discuss the following proposed changes with the members of the Technical Review Committee (TRC):
 - ▶ TRC meetings will be held periodically (e.g., quarterly, semi-annually) as opposed to conducting them on a project by project basis.
 - ▶ The Draft version of technical documents will be submitted to the TRC members for review. Subsequent versions of the report (e.g., draft final and

final) will not be forwarded to the TRC members. The TRC members will receive notification that the documents are available upon request.

- ▶ TRC meetings will focus on all ongoing IRP activities (as opposed to site-specific activities) and will be conducted in a less formal manner (e.g., a luncheon at the Officer's Club).
- Remedial design efforts could potentially be initiated prior to signing the record of decision; however, the Navy would have to weigh the risk of this action since changes in the selection of the alternative would effect the design.
- Preparation of RD Project Plans (prior to signing of the ROD) would be feasible to some extent since changes in the remedial alternative would not significantly alter the Project Plans.
- Remedial design efforts relating to the development of the 30 percent design could be initiated prior to final approval of the RD Project Plans.
- When conducting risk assessments, future risk scenarios should be conservative. The exposure pathway scenarios should assume that the area will be residential.