

LANTDIV Comments
 CTO-0304 Draft RI/FS Project Plans
 OU#13, Site 63
 MCB Camp Lejeune

K. Landman, 7/10/95

emailed to Matt 7/10/95

General Comment

1. Will the area downgradient of 63MW02 be adequately characterized? There is currently no well planned for this area. See Work Plan specific comment #16.

WORK PLAN

1. Page 1-1, Section 1.0

Typo in last sentence of 1st paragraph - should read: "...appropriate CERCLA response *and* RCRA corrective action alternatives...."

2. Page 1-2, Section 1.2

In 2nd bullet on this page, specify that ARARs to be identified in this phase are only *potential* ARARs. They will not become actual ARARs unless we select a remedial option to which they apply.

3. Page 2-4, Section 2.1.3

In the last paragraph, suggest re-wording for clarity as follows:

Baker conducted a site investigation at Site 63 under the direction of Atlantic Division, Naval Facilities Engineering Command (LANTDIV). The Final SI Report (Baker, 1994) presents the results of this investigation.

4. Page 2-4, Section 2.1.4

Typo in last paragraph - should read "... (FEMA National *Flood* Insurance Program).

5. Page 2-5, Section 2.1.6

Typo in 2nd paragraph - should read "...aquifer not used for water supply *at* MCB Camp Lejeune."

6. Page 2-5, Section 2.1.6

In the 7th paragraph, please specify in the text the source of the estimate for vertical hydraulic conductivity of the confining unit. Is this from previous Baker work?

7. Page 2-6, Section 2.1.6

In the 1st paragraph on this page, it is assumed that the last sentence refers to a single past measurement of chloride in the well referred to in the previous sentence. Please clarify.

8. Page 2-6, Section 2.1.6

In the second paragraph, should the 5th sentence read as follows? "Though most of the rainfall entering the surficial aquifer discharges to local streams, a relatively small amount infiltrates through *to* the Castle Hayne."

9. Page 2-6, Section 2.1.6

Typo in the 3rd paragraph on this page - should read *potentiometric surface* not *potentiometer surface*.

10. Page 2-6, Section 2.1.7

Typo in the last sentence of paragraph 2 - should read "...meet *at* the New River Inlet."

11. Page 2-8, Section 2.1.10

Typo in the last sentence of 2nd paragraph - should read "... land use *areas* for Site 63."

12. Page 2-9, Section 2.1.11

In the last paragraph, water supply wells within 1/2 mi radius are discussed. Normally, a survey of nearby wells within at least a one-mile radius is included.

13. Page 2-11, Section 2.2.5

In the 2nd paragraph, clarify when the SI was completed by Baker, i.e. when was field work conducted and when was the report finalized? The Final SI report is dated 1994.

14. Page 2-11, Section 2.2.5.1, Surface Soil

In the 1st bullet, the 1st sentence should refer to *surface* soil samples, not subsurface.

15. Page 2-11, Section 2.2.5.3

When comparing previous results to NC & Federal standards, both the standard(s) and the previous results should be presented for comparison. Also, significance of the effective-range median should be discussed here if it is to be used as a general comparator for metals levels.

16. Page 4-2, Section 4.3.1, Groundwater Investigation

Will we be able to adequately define the area downgradient of 63MW02? Should a well be added to the east of the site boundary, about 1/2 way between MW02 and the surface water body?

Also, clarify that the temporary wells are to be installed by a geoprobe-type direct push unit, not a drill rig. This will clarify why the temporary wells will not need to be developed.

17. Page 4-3, Section 4.3.1, Surface Water/Sediment Investigation

Last sentence of 1st bullet has typo - should be *connection*. Also, 3rd bullet is redundant with last sentence of 1st bullet.

18. Page 4-8, Section 4.6.1.4, Exposure Point Concentrations

Typo in 2nd paragraph - delete extraneous word *upper* in "The upper 95 percent upper confidence limits..."

19. Page 5-1, Section 5.0 and Figure 5-1

The NTR will be Katherine Landman, not Linda Saksvig.

20. Table 2-2

Text on page 2-8 indicates that all the areas included in this table are shown on Figure 2-1. The locations of several regions are not indicated, such as Berkeley Manor/Watkins Village, Tarawa Terrace I & II, Knox Trailer, and French Creek. Also, the statistics for Camp Geiger include the MCAS area - for clarity, this should be indicated here and in the text heading for Section 2.1.10.1 on page 2-9.

Also, why is the Courthouse Bay line in this table in boldface?

21. Table 4-1

Page 4-3 of the Sap indicates that grain size & TOC will only be analyzed for from the 5 stream samples, not all 7 samples. Please clarify.

22. Figure 2-1

See comment #20.

FIELD SAMPLING & ANALYSIS PLAN

1. Table of Contents

Section 4.1 heading should read *Operable Unit No. 13 (Site 63) - Verona Loop Dump*.

In the List of Appendices, Appendix E should read *Decontamination of Sampling and Monitoring Equipment*.

2. Page 1-1, Section 1.0

In the 1st paragraph, the site name should be Verona Loop *Dump*.

Also, NEESA has been reorganized and the name has changed to NFESC, Naval Facilities Engineering Service Center.

3. Page 5-1, Section 5.0

Explanations referring to dissolved metals analyses are confusing since we are not planning any samples dissolved metals analysis. These references should be removed.

QUALITY ASSURANCE PROJECT PLAN

1. Table of Contents

Section 1.0, Introduction, starts on Page 1-1, not 1-3.

Also, Section 8.2, Laboratory Analysis on page 8-1 was omitted. It should be added.

In the List of Tables, Tables 10-1 and 10-2 have been reversed. Table 10-1 is QA/QC Sample Frequency and appears on page 10-2. Table 10-2 is QC Analysis Frequency and appears on page 10-4.

HEALTH & SAFETY PLAN

1. Page 3-1, Section 3.2.1, Surface Soil

See Work Plan comment #14.

2. Page 3-2, Section 3.2.3

See Work Plan comment #15.