



**OHM Remediation
Services Corp.**

A Subsidiary of OHM Corporation

D0-13/ARF

06.01-3/11/99-00695

March 11, 1999

Ms. Mauritz Montegross, Code 18
Atlantic Division, NAVFACENGCOM
LRA, Building A, Room 3200
1510 Gilbert Street
Norfolk, VA 23511-2699

Re: Work Plan Submittal Remediation of the Camp Johnson Battery Dump – Site 85
Contract N62470-97-D-5000, Delivery Order 0013
MCB Camp Lejeune, NC

Dear Ms. Montegross:

Enclosed herewith please find one copy of OHM Remediation Services Corp.'s Final Work Plan for the planned Remedial Action at MCB Camp Lejeune, NC for Site 85. Included with this Work Plan are all the appendices comprising the SHSP, SAP, and QCP plans.

Very truly yours,
OHM Remediation Services Corp.

Danielle Morris for

James A. Dunn, Jr., P.E.
Senior Project Manager

Enclosure

Pc: Mick Sensus – IRD/EMD	Brent Rowse – ROICC
Gena Townsend – EPA Region IV	Kathy Chavara – Baker Environmental
Dave Lown – NCDENR	Greg Hedley – COTR
John Franz – OHM	Randy Smith – OHM w/5 copies
Dave Fulton – OHM	Pete Hunter – OHM
Roland Moreau – OHM	Raymond Boyd – OHM
OHM Project File 920736	Kate Landman – NAVFACENGCOM

RESPONSE TO COMMENTS
ON
REMEDIAL ACTION WORK PLAN
FOR REMEDIATION OF SITE 85
THE CAMP JOHNSON BATTERY DUMP
MCB CAMP LEJEUNE, NORTH CAROLINA

A. Comments from North Carolina Superfund Section.

Response to Comment 1 – USEPA Region III Industrial Soil Risk-Based Concentration has been incorporated into table given on Page 2-1 of the Remedial Action Work Plan. Institutional control will be applied to this site.

Response to Comment 2 – The comment “One characterization sample should be collected for every 500 cubic yards of soil” has been incorporated into Appendix C, Page 3-1, Section 3.1.2.

Response to Comment 3 – Confirmatory samples will be collected from the floor of the excavated areas, and one sample will be collected for every 500 square feet, or fraction therefore, of the base of the excavation. Since the excavated area will be approximately one foot deep with sloped sides, side wall confirmatory samples will not be collected. The above response has been incorporated into Appendix C, Page 3-1.

B. Comments from Baker Environmental, Inc.

Response to Comment 1 – The wording “batteries as well as soil” has been incorporated into the last sentence, Section 1.1, page 1-2.

Response to Comment 2 – The misspelled word “battery” has been incorporated into the first sentence of Section 1.3, page 1-2.

Response to Comment 3 – Figure 2 title has been changed to “Battery Pile Locations”.

Response to Comment 4 – Within the contaminated areas, no stump or root removal will be performed. Section 3.3, page 3-2 has been revised, and the work plan has been revised to delete the word “grubbing” accordingly.

Response to Comment 5 – The specific of the seed mix and fertilizer type is deferred to future response.

Response to Comment 6 – The Baker analytical results may not have all the parameters OHM is looking for. Therefore, OHM will obtain a representative sample and have it analyzed prior to start of work. The text in Section 4.0 page 4-1 will stay as is.

Response to Comment 7 – Contaminated debris will be disposed of in selected landfills. This sentence has been incorporated in Section 5.2, page 5-1.

Response to Comment 8 – The extra word “not” has been deleted from the sentence in Section 5.3, page 5-1.

Response to Comment 9 – The proposed seed mixture will be specified at a later date.

Response to Comment 10 – The base landfill has been included in Section 6.2, page 6-2.

Response to Comment 11 – The “Waste Disposal Activities Checklist” is included in Section 6.5, after page 6-3.

Response to Comment 12 – There is no confined space entry required for the remediation of this site, therefore, this procedure is not provided in the HASP. Sanitation facilities and potable drinking water will be covered during site orientation prior to each employee begin work at site and will not be covered in the HASP.

Response to Comment 13 – The word “batteries” has been added to the scope of work in Appendix A, HASP, Section 1.

Response to Comment 14 – Mr. Randy Smith is the Site Supervisor and is also the Project Supervisor.

Response to comment 15 – PCBs have been deleted from Appendix A, HASP, Section 3.1.

Response to Comment 16 – Appendix A, HASP, Section 6.1 has been revised to incorporate two layers of 10 mil polyethylene in the decontamination areas.

Response to Comment 17 – MSDSs will be prepared in a separate binder and posted on site.

Response to Comment 18 – The PID action levels will stay as shown in Appendix A, Section 7.0.

Response to Comment 19 – The mini-ram action levels will stay as shown in Appendix A, Section 7.0.

Response to Comment 20 – The base hospital is shown in the revised Figure 1. The street address of each hospital is included in Appendix A, Section 8.12.

Response to Comment 21 – The word “batteries” has been incorporated into Exhibit 9.1, Definable Feature of Work.

Response to Comment 22 – The word “batteries” has been incorporated in the Project Task Descriptions in Appendix C, page 2-1.

Response to Comment 23 – The project chemist is to be determined. The pronouns have been revised to reflect a he/she in the paragraph.

Response to Comment 24 – Appendix C, page 3-1, Section 3.1.1, the wording “remediation goals or limits” has been incorporated into the first sentence, last paragraph.

Response to Comment 25 – Appendix C, Page 3-1, has been revised to define SS (stainless steel).