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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

FEB 11 1993

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Byron Brant
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1822
Norfolk, Virginia 23511-6287

RE: Marine Corps Base Camp Lejeune NPL Site
Site 2
Jacksonville, North Carolina

Dear Mr. Brant:

EPA has reviewed the document titled "Draft Final Remedial Investigation and Feasibility Study Work Plan for Operable Unit No. 5 (Site 2) and associated documents. The revised documents incorporate most EPA comments. The enclosed comments must be addressed prior to finalization.

If you have any questions or comments, please call me at (404) 347-3016.

Sincerely,

A handwritten signature in cursive script that reads "Michelle M. Glenn".

Michelle M. Glenn
Senior Project Manager

Enclosure

cc: Peter Burger, NCDEHNR
George Radford, MCB Camp Lejeune

COMMENTS
DRAFT FINAL WORK PLAN
Operable Unit Five
(Site 2)

GENERAL COMMENTS

1. The Navy appears to have missed the intent of EPA's General Comment No. 4 on the Draft RI/FS Work Plan. The comment was not directed at contamination specifically from the Hadnot Point Industrial Area, but was a more general request for the Navy to indicate whether any RI/FS sites are located in the vicinity of Site 2. The Draft RI/FS Work Plan described contamination in the shallow aquifer in the northern part of Camp Lejeune, but there was no indication if the source of this contamination was near Site 2 and whether Site 2 had been affected. At a minimum, a map should be included in the Draft Final RI/FS Work Plan which shows the location of all RI/FS sites and, therefore, if any sites are located near Site 2.

2. The response to EPA's General Comment No. 5 on the Draft RI/FS Work Plan states that groundwater, surface water and sediments are being analyzed for full target compound list (TCL) organic compounds and target analyte list (TAL) inorganic compounds, that soil samples collected at the Building 712 area are primarily being analyzed for TCL pesticides and that only a limited number of samples collected from the Building 712 area are being analyzed for full TCL organic and TAL inorganic compounds.

Although EPA requested TCL/TAL analysis of all soil samples, the revised sampling program is only partially responsive. A substantial percentage of TCL/TAL analysis are proposed for all areas except the area north of Building 712. Additional samples north of Building 712 should be analyzed for TCL/TAL.

EPA requested TCL/TAL analysis of all surface water/sediment samples. The revised sampling program is not responsive to this request. Surface water and sediment samples from only 3 of 23 locations are proposed for full TCL/TAL analysis. Two of the three samples to receive full TCL/TAL analysis are background samples. Additional surface water/sediment samples should be analyzed for the full TCL/TAL constituents to identify types and locations of contaminants of concern and to adequately respond to EPA's request.

EPA requested TCL/TAL analysis of all groundwater samples. The revised sampling program provides for TCL/TAL analysis of all groundwater samples and is therefore responsive to EPA's request.

3. EPA's General Comment No. 6 on the Draft RI/FS Work Plan requests that summary data be provided in the Draft Final RI/FS Work Plan. The Navy was partially responsive to this request by providing summaries of groundwater, soil, surface water and sediment data. However, a potentiometric map should also be included to provide hydrogeologic background data for the proposed groundwater investigation.

SPECIFIC COMMENTS

1. Response to EPA Specific Comment No. 5 on the Draft RI/FS Work Plan, Page 2-23, Section 2.2.6, Table 2-4:
The response to EPA's Specific Comment No. 5 on the Draft RI/FS Work Plan states that the Maximum Contaminant Levels (MCL) for arsenic and lead have been changed in accordance with EPA's comment. However, neither the response nor the Draft Final RI/FS Work Plan addresses the remainder of EPA's comment that the MCL for barium became final July 1991.
2. Response to EPA Specific Comment No. 7 on the Draft RI/FS Work Plan, Page 2-30, Section 2.3.6:
The response to EPA Specific Comment No. 7 on the Draft RI/FS Work Plan states that the listing of North Carolina Water Quality Standard (NCWQS) for iron has been revised as EPA requested. However, this revision has not been incorporated into Table 2-5 of the Draft Final RI/FS Work Plan.
3. Response to EPA Specific Comment No. 11 on the Draft RI/FS Work Plan, Page 5-5, Section 5.3.1.3:
Same as General Comment No. 2.

Draft Final RI/FS Sampling and Analysis Plan

1. Response to EPA Specific Comment No. 1 on the Draft RI/FS Sampling and Analysis Plan, Page 3-1, Section 3.1.2:
Same as General Comment No. 2.
2. Response to EPA Specific Comment No. 5 on the Draft RI/FS Sampling and Analysis Plan, Page 3-1, Section 3.1.2:
Same as General Comment No. 2.
3. Response to EPA Specific Comment No. 15 on the Draft RI/FS Sampling and Analysis Plan, Page 3-17, Section 3.2.2:
Same as General Comment No. 2.

4. Response to EPA Specific Comment No. 18 on the Draft RI/FS Sampling and Analysis Plan, Page 3-19, Section 3.3:
The Navy has addressed EPA's Specific Comment No. 18 that organic-free, deionized water should be used for decontamination procedures. However, the Draft Final RI/FS Sampling and Analysis Plan states that water for trip blanks and preservative blanks will be analyte-free. Water used for both blanks should be organic-free, deionized water.

5. Response to EPA Specific Comment No. 20 on the Draft RI/FS Sampling and Analysis Plan, Page 5-6, Section 5.2.1:
The response to EPA's Specific Comment No. 20 states that "the use of PVC is justifiable" for monitoring well construction. The Navy provided a justification for the use of polyvinyl chloride (PVC) rather than stainless steel in well construction in Attachment A. Part of the Navy's justification for using PVC rests on the assumed occurrence of only two contaminants in the groundwater at Site 2. This assumption cannot be substantiated at this time because the groundwater at Site 2 has not been adequately sampled.

6. Response to EPA Specific Comment No. 25 on the Draft RI/FS Sampling and Analysis Plan, Page 5-27, Section 5.10.3:
The reply to EPA's Specific Comment No. 25 that soil will be stockpiled onsite is not responsive to EPA's comment that soil cuttings should be containerized and not stockpiled onsite.

7. Response to EPA Specific Comment No. 27 on the Draft RI/FS Sampling and Analysis Plan, Page 5-6, Section 5.2.1:
The response to EPA's Specific Comment No. 27 states that the procedure for well installation has been revised to reflect EPA Region IV protocol; however, neither the response nor the Draft Final RI/FS Sampling and Analysis Plan addresses EPA's request that the well screen and cap be placed on approximately 6 inches of sand at the bottom of the borehole to provide a firm footing for the well screen.

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