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(804) 322-4793

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CERTIFIED MAIL RETURN RECEIPT REQUESTED

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

Re: MCB Camp Lejeune; August 3, 1993 Meeting Minutes, Draft
RI/FS Comment-Response Meeting For Operable Unit No. 2

Dear Ms. Townsend:

Attached please find a copy of the meeting minutes for the
referenced subject. If you have any questions, please contact
Ms. Linda Berry, P.E., at (804) 322-4793.

Sincerely,

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

Attachment

Copy to:

MCB Camp Lejeune (EMD, Mr. Neal Paul)
EPA Region IV (Ms. Michelle Glenn, Ms. Jennifer Herndon,
Mr. Kevin Koporec)
NC DEHNR (Ms. Hanna Asseja, Messrs. David Lilley,
Patrick Watters)
DYNAMAC (Mr. Jack Sulima, Mr. Sonny Sun)
Baker Environmental, Inc. (Ms. Tammi Halapin
Messrs. Matt Bartman, Rich Bonelli, Rich Hoff)

Blind copy to:

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MEETING MINUTES, AUGUST 3, 1993
DRAFT RI/FS COMMENT-RESPONSE MEETING FOR OPERABLE UNIT NO. 2
MCB CAMP LEJEUNE, NORTH CAROLINA

A Remedial Investigation/Feasibility Study (RI/FS) comment-response meeting was conducted on August 3, 1993 at the USEPA's Region IV office in Atlanta, Georgia. The purpose of this meeting was: (1) to discuss agency comments to the documents that were unclear, (2) discuss the planned predesign work with respect to additional monitoring wells, (3) confirm the submittal dates for the "Final" documents and the dates for the TRC/public meetings, (4) receive final comments on the public notices and fact sheet, and (5) discuss the disposal options for the treated groundwater.

The following personnel attended the meeting:

Ms. Linda Berry, EIC, LANTDIV
Mr. Neal Paul, EMD, MCB Camp Lejeune
Ms. Michelle Glenn, Remedial Project Manager, USEPA Region IV
Ms. Gena Townsend, Remedial Project Manager, USEPA Region IV
Mr. Kevin Koporec, Toxicologist, USEPA Region IV
Ms. Jennifer Herndon, Geologist, USEPA Region IV
Ms. Hanna Asseja, Toxicologist, NC DEHNR, Superfund
Mr. David Lilley, Industrial Hygienist, NC DEHNR, Superfund
Mr. Jack Sulima, Project Manager, Dynamac
Mr. Sonny Sun, Environmental Engineer, Dynamac
Mr. Matt Bartman, Risk Assessment Specialist, Baker
Mr. Rich Bonelli, Geologist, Baker
Ms. Tammi Halapin, Engineer, Baker
Mr. Rich Hoff, Risk Assessment Specialist, Baker

The meeting began at 11:00 AM and concluded at approximately 1:00 PM. The meeting began with the introduction of all of the attendees. Ms. Glenn introduced Ms. Gina Townsend to the Team as her replacement as Remedial Project Manager for the Camp Lejeune projects.

After the introductions, the meeting continued with a discussion of questions regarding the risk assessment portion of the RI. Summarized below are the relevant issues pertaining to all of the items discussed at the meeting.

Agency Comments on the RI/FS

Overall, only a limited number of individual comments on the RI/FS were discussed at the meeting. An itemized listing of the results of the discussions are presented below.

- EPA suggested that more references to Section 4.0 of the RI are made in Section 6.0 of the RI.
- Justification for elimination of COPCs (i.e., contaminants detected in blanks, contaminants less than background) should be more clearly defined in the text. For elimination of inorganics, less than two times background concentrations is a good rule of thumb. For contaminants detected in blanks use the 5x and 10x rule for uncommon and common lab contaminants, respectively.
- Comment No. 46 - Input parameters should be USEPA defaults unless rationale for site-specific inputs is provided.

- Appendix tables presenting the data summaries (i.e., maximum, minimum, average, 95% UCL) should be in report. However, due to size of report and number of tables, this information was provided in the Appendix.
- Michelle Glenn and Kevin Koporec commented on data summaries and stated that due to the size of the report and the number of sites, semantics was not a big issue.
- USEPA was confused about how RME (95% UCL levels) were calculated - some 95% UCL values listed in the appendix are less than the arithmetic mean. Baker stated that they would investigate the computer program used to determine statistics and see if any discrepancies were evident. In addition, Baker will provide example computation of 95% UCL in Appendix K.
- Region IV is not currently employing the Monte Carlo method. Therefore, an average and 95% UCL risk does not need to be estimated.
- The provisional toxicity values for trichloroethene (TCE) and tetrachloroethene (PCE) will be used to estimate risks from groundwater ingestion and dermal contact.
- The representatives from DEHNR commented to make sure that any changes made in the RI risk assessment are carried through to Section 2.0 of the FS.
- No other individual comments regarding USEPA's comments on the RI or FS were discussed.
- The comments from DEHNR were reviewed at the meeting. The comment regarding the State's only acceptable option for the groundwater (complete remediation) was discussed. This is General Comment No. 4 from the FS. Since Mr. Peter Burger was not present at the meeting, the comment could not be explained. Ms. Glenn thinks that maybe the State misunderstands the intent of our proposed groundwater alternative just because of the title alone (i.e., "Partial" Remediation as compared to "Complete" Remediation). Ms. Glenn was disappointed in the State to see such a comment at this time in the process. The Team decided that a meeting with Mr. Burger and other State personnel may be necessary next week in Wilmington to resolve this issue.
- Ms. Glenn noted an error in the State's comment letter (General Comment No. 2): Mr. Waynon Johnson is not from USEPA Region IV, and that his phone number was listed incorrectly.
- FS Specific Comment No. 2.7: the comment indicates that the risk accepted in the State of North Carolina is 1.0E-06. Ms. Glenn said that unless the State has a promulgated law, this statement is incorrect. The State's ARAR personnel should be contacted to verify.

Planned Predesign Work

Mr. Bonelli discussed the locations and depths of the four new deep wells to be installed within Operable Unit No. 2 - Site 82. He also explained the rationale for these wells (i.e., to better determine the vertical and horizontal extent of deep groundwater contamination). Ms. Jennifer Herndon was concerned that not enough information will be known regarding the groundwater flow direction below the confining clay layer since only two proposed wells will be installed at this depth, and since no other nearby wells are screened at this depth. Mr. Bonelli said that based on the existing regional information, it appears that the groundwater would be flowing in the same direction as the groundwater above the clay layer (i.e., towards Wallace Creek and/or the New River). Ms. Glenn said she concurs with our plan, but

that this issue will be reevaluated once the analytical groundwater data is received from the four additional wells. Additional well(s) may be needed if there is contamination detected in this deeper portion of the aquifer, to verify the extent and groundwater flow direction.

Submittal Dates and Meeting Dates

Ms. Tammi Halapin wanted to confirm if the submittal date for the Final RI/FS Reports was August 23, 1993 since the Draft Final version was being omitted. Ms. Glenn said that the final documents must be available prior to having a public meeting (which is scheduled for August 17, 1993). The date for the TRC/public meeting was changed to August 24, 1993. The TRC meeting will start at 1:00 PM, and the public meeting at 7:00 PM. Ms. Glenn said that the RI/FS documents should be in hand the day before (i.e., August 23, 1993). The public comment period will be between August 24, 1993 to September 24, 1993.

The USEPA wants only one copy of the Final RI/FS, but it has to be a complete set (no inserts).

Final Comments on the Newspaper Notices and Fact Sheet

Ms. Halapin asked if there were any final changes or comments on the Fact Sheet for Operable Unit No. 2 or on the two newspaper notices (one announcing the public meeting for Operable Unit No. 2 and one announcing the signing of the ROD for HPIA shallow aquifer). The revised dates for the public meeting and the public comment period will have to be incorporated into both the fact sheet and the notice.

Disposal Options for the Treated Groundwater

Ms. Glenn, Ms. Berry, and Mr. Neal Paul briefly discussed the issue of what to do with the groundwater (approximately 300 gpm) once it is extracted and treated. The options of reinjecting the water back into the aquifer and use as a drinking water source (i.e., treated and then discharged to the drinking water plant) were both discussed. Ms. Glenn said that USEPA would concur with either option, but that we need the State's opinion. The Team decided that a meeting in Wilmington, North Carolina next week with the appropriate State representatives may be necessary to discuss the potential disposal options and the preferred groundwater alternative.