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State of North Carolina  
Department of Environment,  
Health and Natural Resources  
Division of Solid Waste Management

James B. Hunt, Jr., Governor  
Jonathan B. Howes, Secretary



November 23, 1993

Commander, Atlantic Division  
Naval Facilities Engineering Command  
Code 1823-2

Attention: MCB Camp Lejeune, RPM  
Ms. Katherine Landman  
Norfolk, Virginia 23511-6287

Commanding General

Attention: AC/S, Environmental Management  
Building 67, Marine Corps Base  
Camp Lejeune, NC 28542-5001

RE: Draft Final Remedial Investigation Feasibility  
Study Work Plan, Sampling and Analysis Plan, and  
Health and Safety Plan for Operable Unit #7 (sites  
1, 28, and 30)

Dear Ms. Landman:

The referenced documents have been received and reviewed by  
the North Carolina Superfund Section.

Our comments are attached. Comments on the Health and Safety  
Plan are attached as a memorandum from David Lilley, our Industrial  
Hygienist, to myself. Note also that the Health and Safety Plan  
comments were also provided on the draft version of the document.  
Please call me at (919) 733-2801 if you have any questions about  
this.

Sincerely,

*Patrick Watters*

Patrick Watters  
Environmental Engineer  
Superfund Section

Attachment

cc: Gina Townsend, US EPA Region IV  
Neal Paul, MCB Camp Lejeune  
Bruce Reed, DEHNR - Wilmington Regional Office

North Carolina Superfund Comments  
Camp Lejeune MCB Operable Unit 7 RI/FS Project Plans

General

It was noted in the Work Plan and the Sampling and Analysis Plan that only 1 well is planned to be used to evaluate shallow groundwater downgradient of the suspected source area for Site 30. Recent discussions with LANTDIV and Baker Environmental indicated that this would be acceptable due to the use of the surface water/sediment samples at the nearby stream and because there is considerable uncertainty as to whether or not this is the real source area. It was indicated that a statement would be added to the Final version of these plans to consider additional groundwater monitoring if warranted based on the results of the soil sampling program.

RI/FS Work Plan Specific Comments

1. Page 3-2, Section 3.1.4.1  
The reference to the HPIA in the third sentence should be FCLDA.
2. Page 5-22, Section 5.4.2.2  
Regarding the need for trenching, the Work Plan is not clear when this would be used. This section indicates that trenching would be used to further characterize the nature of the waste material, if present. Clarify how the presence of waste material is to be determined (i.e. analytical results, visual inspection of the samples, etc.).
3. Page 5-27, Section 5.4.2.3  
The well identified as 1GW1 should be 28GW1.

RI/FS Sampling and Analysis Plan (S&AP)

4. Page 1-28 and 1-29, Section 1.2.3.2  
The use of the term "mitigation" should be "migration". Also, the Exposure Pathways list does not include the airborne fugitive particles from contaminated surface soil as a potential pathway as noted on Page 3-10 of the Work Plan.
5. Page 2-2, Table 2-1  
This table does not include the RI/FS objectives for Sites 28 and 30 (see Table 4-1 of the Work Plan).
6. Page 3-8, Section 3.1.3.1  
The description of the monitoring wells for Site 1 indicates that at least 7 shallow wells will be installed during the RI. The Work Plan indicates at least 8 will be used.
7. Page 3-9, Table 3-2  
The HP-636 supply well is included in Table 5-2 of the Work plan but not in Table 3-2.

8. Page 3-17, Section 3.2.3.3  
This section should be numbered 3.2.2.3.
9. Page 3-21, Section 3.2.3.2  
The well identified as 1GW1 should be 28GW1.
10. Page 3-29, Section 3.3.3.2  
This section indicates that one groundwater sample from 30GW3 will be analyzed for engineering parameters. The Work Plan indicates that well 30GW1 will be used for the engineering parameters sample.

November 8, 1993

TO: Patrick Watters

FROM: David Lilley

DBL

RE: Comments prepared on the Draft Final Remedial Investigation/Feasibility Study Health and Safety Plan for Operable Unit No. 7 (Sites 1, 28, and 30), MCB Camp Lejeune, NC

After reviewing the above mentioned document, I offer the following comments:

1. Page 5-2: It is unclear to the reader what information is being conveyed by differentiating between external and internal probes for radiation survey meters.
2. Cartridge respirators are not recommended for use on site 1 because 1,1,2,2-tetrachloroethane has inadequate warning properties.
3. Cartridge respirators are not recommended for use on site 28 because manufacturer's literature states that cartridge respirators should never be used to protect against vinyl chloride.
4. Page 5-1: How sure are you that the chemicals listed on Table 3-1 are the only chemical contaminants present on site 30? If the site has been extensively sampled and you are very sure these are the only contaminants present, level C protection may be appropriate. If not, level C will not be appropriate.