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CERTIFIED MAIL RETURN RECEIPT REQUESTED

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

Re: Proposed Remedial Action Plans Operable Units No. 1 and  
No. 5 MCB Camp Lejeune, North Carolina

Dear Ms. Townsend:

Enclosed are the meeting minutes for the May 3, 1994 meeting in  
Atlanta, Georgia. Any questions concerning these responses  
should be directed to Ms. Linda Berry who may be reached at  
(804) 445-8637.

Sincerely,

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

Enclosure

Copy to: (w/encl)  
NC DEHNR (Mr. Patrick Watters)  
MCB Camp Lejeune (Mr. Neal Paul)  
Baker Environmental (Mr. Ray Wattras)

Blind copy to:  
~~XXXX~~ (LGB) 2 copies w/encls)  
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## MEETING MINUTES

May 3, 1994

### Operable Unit No. 1 (Sites 21, 24, and 78) and Operable Unit No. 5 (Site 2)

A meeting was conducted on May 3, 1994 at EPA Region IV in Atlanta, Georgia. The purpose of the meeting was to discuss the proposed remedial action plans for Operable Units No. 1 and No. 5. The following personnel were in attendance:

Ms. Linda Berry, LANTDIV  
Mr. Walt Haven, MCB Camp Lejeune EMD  
Ms. Gena Townsend, EPA Region IV  
Ms. Jennifer Herndon, EPA Region IV  
Mr. Kevin Koporec, EPA Region IV  
Mr. Patrick Watters, North Carolina DEHNR  
Mr. Ray Wattras, Baker  
Mr. Don Shields, Baker  
Ms. Tammi Halapin, Baker  
Mr. Rich Bonelli, Baker  
Mr. Matthew Bartman, Baker

The following items were discussed or agreed to during the meeting:

1. The recommended alternative for OU No. 5 (Alternative 2 - Limited Action) was acceptable to both Ms. Gena Townsend and Mr. Patrick Watters. The name of the alternative, however, will be changed to "Long-Term Groundwater Monitoring and Institutional Controls."
2. Due to slightly elevated levels of organics (toluene and ethylbenzene) and total metals above North Carolina drinking water standards, a waiver from the North Carolina standards will be necessary if remediation is not performed. Baker has prepared a letter that justifies the reason for the waiver. The letter, which was forwarded to LANDIV on April 29, 1994, addresses the criteria identified in the North Carolina regulations for not implementing corrective action. LANTDIV will be forwarding a letter to the North Carolina DEHNR requesting a waiver to not remediate the shallow aquifer at Site 2.
3. Due to elevated levels of total metals in groundwater, a waiver from meeting the Federal standards (i.e., MCLs) and State standards will be required for both Operable Units No. 1 and 5 on the grounds of engineering practicality. Baker believes that the elevated metals are either related to base-wide activities (i.e., not related to former disposal activities) or sampling techniques/well construction factors which would result in biased high levels of total metals due to suspended particulates. Baker noted that practically every site that has been investigated has shown that elevated levels of total metals are present in the shallow groundwater; however, dissolved metal concentrations have not been

elevated. Ray Wattras indicated that there does not appear to be any particular pattern to the metals contamination with respect to either elevated soil levels, which would correlate to the elevated metals, or a discrete definition of a plume configuration.

4. Gena Townsend and Patrick Watters indicated that it will take some time (possibly months) for the EPA and State to grant these waivers. It is unlikely that a waiver could be approved before May 24, which was the target date for the start of the public comment period for OUs No. 1 and No. 5. A third quarter ROD is not possible without this waiver. The FFA schedule does not indicate the signing of the ROD until the fourth quarter of FY 94.

5. Since the total metals issue is likely to be a problem for all sites, Ms. Townsend suggested that we address and resolve the problem now in order to obtain a "blanket" waiver from both the State and EPA. However, the "blanket" waiver would need to identify certain criteria so that it does not apply to all inorganic groundwater contamination problems at MCB Camp Lejeune.

6. A decision was made to make a presentation to the State explaining the situation with elevated total metals in the shallow aquifer at MCB Camp Lejeune. Baker will evaluate the following: total metals concentrations in upgradient (background or control) shallow wells versus onsite shallow wells; total metals concentrations in upgradient (background or control) deep wells versus onsite deep wells; dissolved metals concentrations in upgradient wells versus onsite wells; a comparison of metal concentrations in subsurface soil for both "clean" wells and "contaminated" wells; total inorganic levels in shallow groundwater at Cherry Point; inorganic levels in shallow groundwater in Jacksonville (ABC Cleaners Superfund Site); and regional groundwater quality using USGS reports. The evaluation will determine whether the elevated total metals are present due to site activities, or whether the total metals are elevated throughout the base or region. In addition, the study may indicate that the elevated total metals are due to sampling techniques or well construction factors.

7. Don Shields summarized the comments received on the Draft RI and FS reports for OU No. 5. As a result of the comments, Baker installed two additional shallow wells at Site 2, and collected another round of groundwater samples.

8. Tammi Halapin summarized the comments received on the Draft RI and FS reports for OU No. 1. As a result of the comments, Baker will calculate soil cleanup levels for Site 78 based on current usage of the area. With respect to other comments, Baker needs to provide additional justification for not remediating the deep aquifer. This justification will be based on remediating the aquifer may result in greater risks to human health and environment. Ms. Halapin explained that pumping the deep aquifer may result in influencing the migration of contaminants from the shallow aquifer, which is significantly more contaminated than the deep aquifer, to the deep aquifer. Base supply wells are located in the deep aquifer.

9. Matt Bartman asked Kevin Koporec for guidance and definitions of preliminary remediation goals (PRGs), remediation levels (RLs), and remediation goal options (RGOs). Mr. Koporec explained EPA Region IV's draft definitions and applications of this terminology in the RI/FS process.

10. A list of "action items" was discussed prior to concluding the meeting. This list includes:

a. Baker will evaluate inorganic data for shallow groundwater and present the results and conclusions to the State.

b. LANTDIV will request a waiver to not remediate shallow groundwater at Site 2. This request will be submitted to the State following the meeting in which the inorganic groundwater results will be presented to the State. This meeting is tentatively scheduled for June 6, 1994, at DEHNR's office in Wilmington, North Carolina.

c. No ROD will be signed during the third quarter of FY4.

d. EPA and the DEHNR will review the Draft Final RI, FS, PRAP, and ROD documents for OUs No. 1 and No. 5.