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UNITED STATES MARINE CORPS

MARINE CORPS BASE
PSC BOX 20004
CAMP LEJEUNE, NORTH CAROLINA 28542-0004

IN REPLY REFER TO:

6286

BEMD

14 JUN 1995

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commander, Atlantic Division, Naval Facilities Engineering
Command, Attn: Ms. Katherine Landman (Code 1823), 1510
Gilbert Street, Norfolk, Virginia 23511-2699

Subj: WORK PLAN FOR SOIL REMEDIATION, SAMPLING AND ANALYSIS
PLAN, SITE-SPECIFIC HEALTH AND SAFETY PLAN, OPERABLE UNIT
10, SITE 35, MARINE CORPS BASE, CAMP LEJEUNE, NORTH
CAROLINA

Encl: (1) Comments concerning the Work Plan for Soil
Remediation, Sampling and Analysis Plan, Site-Specific
Health and Safety Plan for Operable Unit 10, Site 35
Marine Corps Base, Camp Lejeune, North Carolina

1. The subject document has been reviewed. Our comments are contained in the enclosure.
2. It is requested that the Installation Restoration Division, Environmental Management Department, Marine Corps Base, Camp Lejeune be notified of the actions taken to accommodate the comments provided in the enclosure.
3. If you have any questions or comments, please contact Mr. Neal Paul, Director, Installation Restoration Division, Environmental Management Department, at telephone (910) 451-5068.

A handwritten signature in cursive script, appearing to read "Robert L. Warren".

ROBERT L. WARREN
By direction

Comments concerning the Work Plan for Soil Remediation, Sampling and Analysis Plan, Site-Specific Health and Safety Plan for Operable Unit 10, Site 35 Marine Corps Base, Camp Lejeune, North Carolina

Work Plan for Soil Remediation

1. Page 2-1, 2.0 Site Background, states that Areas A, B, C, and D will be remediated in this work plan. It is the understanding of this office that Area D will be remediated under the UST program.
2. Page 4-1, 4.0 Site Preparation and Mobilization, indicates that pilot testing will be conducted to determine which test kit to use. The data gathered in this pilot test can either be obtained from the kit manufacturer, or it should already be known. It is requested that this data be gathered on the contractor's own time.
3. Page 6-2, 6.2 Soil Excavation, indicates that the excavation may be greater than four feet deep. Note that excavations greater than four feet deep can be considered a confined space. Confined space entry requires an access permit and monitoring if occupied by personnel.
4. Page 6-4, 6.4.1 Characterization of Wastestreams, states that contaminated soils that do not exceed the TCLP regulatory limits will be disposed of at an off-site thermal treatment/recycling facility. The possibility of using the bioremediation facility at Lot 203 should be considered.

Sampling and Analysis Plan

1. Page 3-1, 3.1 Sampling Methods and Procedures, states that a pilot study will be performed to evaluate and validate the screening methods. This data can be obtained from the manufacturer.
2. Page 3-2, 3.1.1 Segregation of Excavated Soils, states that if the Total Petroleum Hydrocarbon (TPH) is greater than 100 mg/kg, the soil will be designated as contaminated. Page 6-1 of the Work Plan for Soil Remediation states that the action levels will be 40 mg/kg per EPA Method 5030/8015 and 160 mg/kg per EPA method 3550/8015. There is an inconsistency in the action levels and the determination of contaminated soils. It is requested that this discrepancy be corrected.

Health and Safety Plan

1. Page 1-1, 1.1 Site History, this section should be corrected to indicate that the Base covers 236 square miles instead of 170 square miles.
2. Page 8-4, 8.2 Emergency Recognition and Prevention, states that the maps for the routes to the hospital are posted on-site. These maps should also be included in the Health and Safety Plan.