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DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
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IN REPLY REFER TO:

5090

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10 DEC 1991

State of North Carolina
Department of Environment,
Health, and Natural Resources
Attn: Mr. Jack Butler
Division of Solid Waste Management
P.O. Box 27687
Raleigh, North Carolina 27611-7687

Re: MCB Camp Lejeune; Draft RI/FS Work Plan for Sites 6, 48,
and 69

Dear Mr. Butler:

This correspondence is in reference to a telephone conversation between our Ms. Laurie Boucher and yourself of November 20, 1991 concerning the Remedial Investigation at Site 69 (Rifle Range Chemical Dump) at MCB Camp Lejeune.

On December 1, 1991, we forwarded to EPA Region IV and N.C. DEHNR the draft project plans (Work Plan, Sampling and Analysis Plan, and Health and Safety Plan) for Remedial Investigation/Feasibility Study (RI/FS) work at Sites 6, 48, and 69. As we discussed during our telephone conversation, these project plans reflect a noninvasive field approach at Site 69 (Rifle Range Chemical Dump). This letter serves to document our present difficulties with conducting additional invasive field work at Site 69 at this time.

Site 69 is a chemical dump which has the high likelihood of containing chemical surety agents. The complexities of dealing with such materials presents several problems.

One key issue involves worker health and safety. Although we have been discussing this subject with the technical experts [U.S. Army Armament, Munitions, and Chemical Command (AMCCOM); U.S. Army Technical Escort Unit (TEU); and U.S. Army Toxic and Hazardous Materials Agency (USATHAMA)], we have not yet pieced together all the components that would ensure the safety of our workers.

Another key issue involves the proper securing and storage of chemical surety material uncovered during such an investigation. In our discussions with the TEU and USATHAMA, we've discovered the following:

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and 69

a. If the TEU uncovers chemical surety material or suspect chemical surety material during a site characterization, the TEU is required to secure this material, i.e., the TEU cannot leave the chemical surety material in place.

b. Chemical surety material removed from a waste site is/may be classified as a regulated hazardous waste.

c. Presently, DoD chemical surety storage units do not have RCRA permits for storage of hazardous waste. Therefore, no locations are available to accept such chemical surety material.

These issues of worker health and safety and the proper storage of chemical surety material have not been resolved at this point. Along with these issues, we need to further clarify the appropriate site investigation guidelines and ultimate disposal technologies. We have requested per our letter to AMCCOM dated November 19, 1991 that the U.S. Army assist us resolving these issues.

These critical issues need to be resolved by the Departments of Navy and Army before it is appropriate to begin any intrusive on-site work. Due to past site monitoring efforts, remoteness from population and the security fence, this site does not appear to present an imminent hazard situation. The safest course of action is to define the site as best as possible using non-invasive field techniques (e.g., geophysics; ground penetrating radar, groundwater samples from existing site wells, surface water, and sediment sampling) until these issues have been resolved. We will provide EPA an update on our planned non-invasive field techniques in our quarterly progress reports. Further, any input you could provide to help us resolve these issues or suggestions on other non-invasive technical approaches would be appreciated.

Our point of contact for questions concerning this matter is Ms. Laurie Boucher, P.E., at (804) 445-1814.

Sincerely,



P. A. RAKOWSKI, P.E.

Head

Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Copy to:

EPA Region IV (Attn: Mr. Carl Froede)
MCB Camp Lejeune (AC/S, Environmental Management)

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and 69

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