

Wagner, Glenn

From: Capito, Bonnie P CIV NAVFAC Lant [bonnie.capito@navy.mil]
Sent: Wednesday, June 17, 2009 1:22 PM
To: Wagner, Glenn
Subject: FW: MCAS Cherry Point OU1 site 83 EPA comments SAP OU1 Site 83
Signed By: There are problems with the signature. Click the signature button for details.

Attachments: Pre draft SAP OU1 Site 83, EPA comments March 2009.pdf



Pre draft SAP OU1
Site 83, EPA...

-----Original Message-----

From: Nielsen, Janice L CIV NAVFAC MidLant
Sent: Tuesday, June 16, 2009 12:44
To: Capito, Bonnie P CIV NAVFAC Lant
Subject: MCAS Cherry Point OU1 site 83 EPA comments SAP OU1 Site 83

EPA Comments on the UFP SAP for the OU1 Site 83 sampling for delineation. Jan

Jan Nielsen
NAVFAC Mid-Atlantic
Remedial Project Manager, Cherry Point MCAS Marine Corps North Carolina IPT
(757)322-8339

-----Original Message-----

From: Townsend.Gena@epamail.epa.gov [mailto:Townsend.Gena@epamail.epa.gov]
Sent: Monday, May 18, 2009 9:45
To: GeorgeL100@aol.com; townsend.gena@epa.gov; jeffrey.christopher@usmc.mil;
george.lane@ncdenr.gov; doug.bitterman@ch2m.com; tim.wenk@ch2m.com; erica@rhea.us;
Nielsen, Janice L CIV NAVFAC MidLant
Subject: EPA comments SAP OU1 Site 83

Hi All,

See attached

(See attached file: Pre draft SAP OU1 Site 83, EPA comments March 2009.pdf)

Gena D. Townsend
US EPA
61 Forsyth Street, SW
Atlanta, Georgia 30303
Tel. No: (404) 562-8538
Townsend.Gena@epa.gov

EXECUTIVE SUMMARY

This Sampling and Analysis Plan (SAP) provides the procedures and requirements to be implemented for collecting the proposed soil samples at Operable Unit 1 (OU1) Site 83 at Marine Corps Air Station (MCAS) Cherry Point, North Carolina, and was prepared in accordance with the requirements of the Uniform Federal Policy for Quality Assurance Plans (UFP-QAPP) (United States Environmental Protection Agency [USEPA 2005]) and USEPA Guidance for Quality Assurance Project Plans, USEPA QA/G-5, QAMS (USEPA 2002). The Navy, Naval Facilities Engineering Command (NAVFAC), Mid-Atlantic Division, is conducting this sampling under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). ~~USEPA Region 4 is the lead regulatory agency.~~

The objective of the soil sampling is to confirm residual contamination of polycyclic aromatic hydrocarbons (PAHs), pesticides, and lead at the site, characterize portions of the site where historical information is limited or suspect, and to delineate the vertical and horizontal extent of impacted site soils. This information will be incorporated into future site documents, which will be used to provide vital information for developing feasible remedial alternatives. These additional investigative samples will be utilized as pre-confirmatory samples in the event that an excavation remedial alternative is selected.

Soil samples will be collected from three areas (i.e., Areas A, B, and C) at Site 83, including the former area of Building 96 and the adjacent lot, the area west of Building 96, and the area southwest of Building 96. Samples will be collected at a minimum of 29 locations and analyzed for specific PAHs and pesticides. A select grouping of samples will also be analyzed for lead.

Environmental Chemistry Consulting Services, Inc. (ECCS), a National Environmental Laboratory Accreditation Conference (NELAC) and North Carolina Department of Environment and Natural Resources (NCDENR) certified mobile laboratory, will provide analytical services for this project. TestAmerica Laboratories, Inc. (TestAmerica) will provide fix-based analytical services for lead analysis.

This SAP serves to guide the sampling effort so that the analytical data generated from the soil sampling will be of the quantity and quality necessary to provide technically sound and defensible assessment of the vertical and lateral extent of the Site 83 soil contamination.

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Date: 5/14/2009 10:44:27 AM

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The following sections briefly summarize the various site investigations and other site actions completed to date at Site 83 (from oldest to most recent).

10.2.1 Facility Maintenance Department Spill Response

In February and April 1996, remedial activities were conducted for the cleanup of an oil spill near the Facility Maintenance Department (FMD) oil-water separator (OWS). The OWS was located south of Site 83, and the spill extended into the southern portion of Site 16. Petroleum-contaminated soil was excavated to depths ranging from 2 to 4 feet (below ground surface (bgs) and confirmation samples were collected from the sides and bottom of the excavation. Excavated soil was disposed of offsite.

During the excavation activities, pesticide contamination was observed in the soil based on visual and olfactory observations. Ten soil samples collected from the sides and bottom of the excavation were analyzed for chlordane. Since pesticides were detected in the soil, the remedial action for the oil spill was stopped. The details of the investigation are presented in the FMD Spill Response Summary Report, Operable Unit 1, Site 16 (FMD Spill Response Summary Report) (OHM, 1996).

There is uncertainty¹ regarding the locations of the soil samples collected during this spill response, as the 2002 RI (TetraTech, 2002) locations do not corroborate the locations identified on the FMD Spill Response Report (OHM, 1996). Similarly, the 2002 RI reported that the excavation bottom confirmation samples 16-FMD-CP63CS070, 16-FMD-CP63CS071, 16-FMD-CP63CS073, and 16-FMD-CP63CS075 were collected at a depth of 0 to 1 feet bgs; however, it is also documented that the samples were collected at a depth of 3 feet bgs (OHM, 1996).

10.2.2 Solid Waste Management Unit Assessment

In 1997, MCAS Cherry Point notified NCDENR and USEPA that a new SWMU had been discovered at Building 96, and the area was subsequently designated as Site 83. Multiple soil, sediment, and groundwater samples were collected and three monitoring wells were installed in the vicinity of the former Building 96. Details of the investigation are documented in the SWMU Assessment Report for Site 83, Building 96 Former Pesticide Mixing Area, Marine Corps Air Station Cherry Point, North Carolina (B&R, 1998). Pesticides and PAHs were detected in the surface soil at concentrations that pose an unacceptable risk to industrial workers; however, these concentrations were detected beneath the building concrete pad and did not provide a complete exposure pathway.

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Author: GTOWNSEN

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 This is an accurate depiction of the Site 83 discussion. However, it appears to be contradictory. It is stated that Hill would proceed to an FS, and yet we are reviewing a SAP for additional sampling. Another statement should be added explaining the change in direction.

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Gena said there are two options at this time: the FS can continue with the data we have or there can be an additional investigation to go back out and get data. Doug agreed but said the lateral and vertical extents of the removal area will have to be refined at some point. He said he was concerned that what we learn from this eventual sampling might change the team's opinion on the selected remedy. George said he thinks it is clear that additional samples are necessary, and we just need to decide when to collect the samples.

Bill asked the team if they are comfortable with proceeding with the FS submittal given the significant remedial assumptions/issues. Gena said that she was fine with moving forward with the FS and completing the ROD. She said if we proceed with an excavation remedy and the actual quantity exceeds what has been assumed, we need to stop and revisit everything. She added if nothing changes but the quantity the ROD is still acceptable as the changes would be fairly insignificant.

Given the location and use of the area near Site 83, Doug asked if it was even necessary to spend the money to clean the site up via a removal action. Gena said if chlordane is driving the risk and it is a listed waste, the contamination can not just be left there. Doug replied that the exposure pathway would be someone going into the woods and digging around in the dirt, so LUCs would seem to be sufficient. Gena said LUCs would be sufficient if the contamination was not within the first foot of soil.

Gena said regulations are likely to become more conservative over time. She said that she does not believe any additional removal volume would actually lead to a different alternative for the site. Jeff said once the ROD is complete, the removal action has to start within a year or so and he is concerned that the excavation area would be open for a long time while the answers to all of the questions about the site are figured out. Gena replied that you do not have to start digging right away; rather you just need to show continuous operations at the site. She said that will allow for collecting pre-excavation samples to delineate the extent. Gena said she does not see the need to collect samples at this point since it will not change the remedy. She just suggested that conservative assumptions be made when the costs are being developed.

Jan asked if the current plan for the FS is only to dig a certain amount and leave anything below that in place or will the excavation continue to chase the contamination and try to get all of it. Bill said the FS currently assumes that the excavation is only to go to a depth of one foot. Gena said based on previous investigations we know there are two areas with elevated concentrations at 3 feet below ground surface, so the FS needs to factor in an area with a depth of up to 3 feet to get additional quantity. Jan clarified that since they found the contamination at 3 feet, the excavation may have to go deeper still. Gena added that she does not think it is necessary to do anything where the previous removal action and backfill occurred.

2 Doug summarized that CH2M HILL will proceed with the FS using the current assumptions and a sampling/delineation approach will be developed at a later date.”



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Superfund

SAP Worksheet #3 -- Distribution List

Name of SAP Recipients	Title/Role	Organization	Telephone Number (Optional)	E-mail Address or Mailing Address	Document Control Number (Optional)
Janice Nielsen	Remedial Project Manager	NAVFAC Mid-Atlantic	757-322-8339	Email: Janice.nielsen@navy.mil Mailing/FedEx address: Commander NAVFAC MIDLANT LRA, Building C, NC IPT 6506 Hampton Blvd Norfolk, VA 23508-1278	
Jeff Christopher	Installation Restoration Program Manager	MCAS Cherry Point Environmental Affairs Department	252-466-4421	Email: Jeffrey.christopher@usmc.mil Mailing address: MCAS Cherry Point PSC Box 8006 Cherry Point, NC 28533-0006 FedEx address: MCAS Cherry Point Building 4223, Access Road Cherry Point, NC 28533-0006	
Gena Townsend	Remedial Project Manager	USEPA Region 4	404-562-8538	Email: townsend.gena@epa.gov Mailing/FedEx address: USEPA Region 4 Atlanta Federal Center Waste Management Division Federal Facilities Branch  Forsyth St. SW Atlanta, GA 30303-3104	

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Author: GTOWNSEN
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Federal

SAP Worksheet #2 -- SAP Identifying Information

Site Name/Number: Site 83 Soil Delineation Sampling

Operable Unit: OU1

Contractor Name: Rhēa Engineers & Consultants, Inc.

Contract Number: N40085-08-D-1409, CTO 0002

Contract Title: Environmental Remediation Services

1. This SAP was prepared in accordance with the requirements of the *Uniform Federal Policy for Quality Assurance Plans (UFP-QAPP)* (USEPA 2005) and *EPA Guidance for Quality Assurance Project Plans, EPA QA/G-5, QAMS (USEPA 2002)*.

2. Identify regulatory program: CERCLA

3. This SAP is a project-specific SAP.

4. List dates of scoping sessions that were held:

Scoping Session	Date
<u>Partnering Meeting</u>	<u>November 2008</u>
<u>Partnering Meeting</u>	<u>February 2009</u>

5. List dates and titles of any SAP documents written for previous site work that are relevant to the current investigation.

Title	Date
<u> </u>	<u> </u>

6. List organizational partners (stakeholders) and connection with lead organization:

Lead Organization: U.S. Navy (NAVFAC, Mid-Atlantic); ¹Lead Regulatory Agency: USEPA Region 4; State Regulatory Agency; NCDENR. ²

- If any required SAP elements or required information are not applicable to the project or are provided elsewhere, then note the omitted SAP elements and provide an explanation for their exclusion below:

The required SAP elements are included in this document.

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Author: GTOWNSEN
Subject: Cross-Out
Date: 5/14/2009 2:11:31 PM

Tcorrect spelling.
