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NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT

March 4, 1998



JAMES B. HUNT JR.
GOVERNOR

WAYNE MCDEVITT
SECRETARY

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DIRECTOR

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823

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

Commanding General
Attention: AC/S, EMD/IRD
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

RE: NC Superfund Comments on the
Work Plan for Aggressive Fluid Recovery Pilot Test
Former AST Area, Site 86
MCB Camp Lejeune, North Carolina

Dear Ms. Landman:

The referenced document has been received and reviewed by the North Carolina Superfund Section and our comments are below:

1. Page 1-1, Section 1.0, First Paragraph. Trichloroethene is the major contaminant at Site 86.
2. Page 1-1, Section 1.0, Third Paragraph. References to "free product" are also found in Sections 2 and 3.
3. Comment by David Lilley on the Health and Safety plan:

Page 2: The upgrade from level C to level B protection (according to page 7-1 of the safety plan) occurs at PID readings of greater than 500. According to the NIOSH Pocket Guide, the IDLH for tetrachloroethene is 150 ppm. **IT IS STRONGLY RECOMMENDED THAT LEVEL C NOT BE USED IN AREAS WHERE THE CONCENTRATION OF VAPORS EXCEED THE IDLH.** For groundwater concentrations this low, I would think the likelihood of such high concentrations

00-122 / ARE

Ms. Katherine Landman
March 4, 1998
Page 2

would be remote. If higher concentrations are encountered, I would also hope the crew would look into what is causing the problem long before concentrations reach 500 meter units.

Please call me at (919) 733-2801, extension 278 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "David J. Lown". The signature is fluid and cursive, with the first name "David" being the most prominent.

David J. Lown, LG, PE
Geological Engineer
Superfund Section

cc: Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune