

04.01-07/08/92-01152

(804) 445-2931

5090  
1823:BCB:srw  
08 JUL 1992

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Jack Butler  
North Carolina Department of Environment,  
Health, and Natural Resources  
Post Office Box 27687  
401 Oberlin Road  
Raleigh, North Carolina 27611

Re: MCB Camp Lejeune Interim Remedial Action for the Hadnot  
Point Shallow Aquifer

Dear Mr. Butler:

We recently finalized the "Interim Remedial Action Proposed Plan for the Shallow Aquifer at the Hadnot Point Industrial Area Operable Unit Camp Lejeune, North Carolina", in which we proposed Trichloroethylene (TCE) contaminated groundwater extracted during the remedial action efforts be treated at the Hadnot Point Sewage Treatment Plant (STP). As we agreed during a Remedial Project Managers' meeting at Camp Lejeune on April 29, 1992, we plan to conduct a pilot study to confirm the feasibility of this treatment and disposal option for the contaminated groundwater.

The pilot study will address the following issues:

1) The comparability of treatment afforded by the Hadnot Point STP versus treatment by oil/water separation, chemical reduction, air stripping, and carbon adsorption (which was recommended as "the minimum treatment required" in your letter of March 24, 1992); and

2) Any possible adverse impacts of the contaminated groundwater on the Hadnot Point STP, such as decreased Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS) removal.

To evaluate the first issue, groundwater from the site will be treated through a bench scale treatment process to simulate treatment through a system containing an oil/water separator, a chemical reduction system, an air stripper, and a carbon column. Effluent from this bench scale treatment process will be analyzed for TCE and Benzene, Toluene, Ethylbenzene, and Xylene (BTEX) to determine pollutant discharge concentrations. These discharge concentrations will be used for comparison with the discharge concentrations measured during the pilot testing of the proposed treatment at the Hadnot Point STP.

Re: MCB Camp Lejeune Interim Remedial Action for the Hadnot  
Point Shallow Aquifer

To evaluate the second issue, groundwater from the site will be transported to the Hadnot Point STP via a tanker truck for introduction into the head of the plant. During the actual remediation, groundwater will be treated through an oil/water separator which will be constructed at the site, then discharged to a nearby sanitary sewer. To simulate oil/water separation during the pilot study, the groundwater will be allowed to sit in the tanker truck upon arrival at the plant for period of time representing the expected detention time in the on-site separator. Then, the groundwater will be metered into the head of the plant at the flow rate expected during actual site remediation. Sampling and analysis will be conducted at various points throughout the plant to evaluate the TCE treatment and to monitor any impacts on the biological system. Effluent sampling will also be conducted to determine the STP treatment efficiencies for TCE and BTEX, which will be compared with the discharge concentrations from the bench scale treatment system discussed above.

It is our intention to meet all compliance requirements as outlined in the Special Order by Consent during the course of the pilot study work at the Hadnot Point STP. During the pilot work, BOD/COD and TSS effluent concentrations will be frequently monitored. If at any time it is evident that the plant is experiencing upset conditions caused by the introduction of the groundwater, or if plant effluent limits are in danger of being violated, the flow of contaminated groundwater to the plant will be shut off immediately and the plant will be allowed to stabilize. If this should occur, we will determine at that time if the pilot work should continue.

We plan to begin the pilot work at the Hadnot Point STP in October 1992. This pilot work will continue for several weeks, ending in December 1992. Specific details concerning the length of the pilot study, quantity of contaminated groundwater to be treated, and exact testing procedures will be included in the Draft Remedial Design Work Plan, which we plan to submit for your review and comment in August 1992.

As a condensed schedule is necessary to ensure that our design and construction of the Interim Remedial Action for the Hadnot Point Industrial Area Shallow Aquifer are accomplished within the timeframes established by environmental regulations, we request you respond to us by July 17, 1992 with any objections or concerns regarding this pilot study. Otherwise, we will assume your concurrence.

Re: MCB Camp Lejeune Interim Remedial Action for the Hadnot  
Point Shallow Aquifer

Any questions concerning this matter should be directed to  
Mr. Byron Brant at (804)-445-2931.

Sincerely,

P. A. RAKOWSKI, P.E.  
Head  
Environmental Programs Branch  
Environmental Quality Division

Copy to:  
EPA Region IV (Ms. Michelle Glenn)  
MCB Camp Lejeune (Mr. George Radford)  
NCDEHNR (Mr. Dave Adkins)

Blind copy to:  
182  
1823 (BCB - 2 copies)  
Admin. Records for MCB Camp Lejeune  
1812  
18S  
f:\admin\typein\TSTUD}N.BCB  
BCBDOC:TSTUD}N.BCB