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CERTIFIED MAIL RETURN RECEIPT REQUESTED

Waste Management Division
United States Environmental Protection Agency,
Region IV
Attn: Ms. Michelle Glenn
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: MCB Camp Lejeune; Responses to EPA Region IV Comments on
the Preliminary Draft Remedial Action Work Plan for the
Shallow Aquifer at Hadnot Point Industrial Area MCB Camp
Lejeune, North Carolina

Dear Ms. Glenn:

We have received the EPA Region IV comments (letter dated
April 13, 1993) to the subject draft final document. The
Navy/Marine Corps responses to these comments are enclosed.

Any questions concerning these responses should be directed to
Ms. Linda Berry at (804) 445-8637.

Sincerely,

L. A. BOUCHER, P.E.
Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Encl:
Response to EPA Region IV Comments on the Preliminary Draft
Remedial Action Work Plan for the Shallow Aquifer at Hadnot Point
Industrial Area MCB Camp Lejeune, North Carolina

Copy to:
NC DEHNR (Mr. Peter Burger)
MCB Camp Lejeune (Mr. Neal Paul)
Blind copy to:
1823 (LGB) (2 copies w/encls); 18S, LGBDoc:wp30res

ENCLOSURE

RESPONSES TO USEPA REGION IV'S COMMENTS ON THE
DRAFT REMEDIAL ACTION WORK PLAN
FOR THE HADNOT POINT INDUSTRIAL AREA
SHALLOW AQUIFER
MARINE CORPS BASE CAMP LEJEUNE

1. **Tentative formulation of the Remedial Action Team including personnel, duties, and lines of authority are not addressed in the Work Plan.**

Response to Comment:

According to Ms. Michelle Glenn, this comment does not have to be addressed. Therefore, no changes were made to the Work Plan.

2. **Roles and relationships of the project participants other than the RA Contractor are not addressed.**

Response to Comment:

The text has been revised to include the roles and relationships of the project participants.

3. **The Work Plan discusses the RA "Contractor" procurement in Section 4.0, not the "Constructor".**

Response to Comment:

The text has been revised to indicate that "Contractor" and "Constructor" can be used interchangeably.

4. **No mention of a process to continuously update the project/construction schedule.**

Response to Comment:

According to Ms. Michelle Glenn, this comment does not have to be addressed. Therefore, no changes were made to the Work Plan.

5. **Criteria and composition of the Independent QA Team are not addressed in Section 8.0 of the Work Plan.**

Response to Comment:

The Work Plan now references Section 01400 of the project specifications, which addresses construction quality control.

6. **No comment, the components of a Health and Safety Plan are addressed in the Work Plan.**

Response to Comment:

No response necessary.

7. **The strategy for implementing the Contingency Plan is not addressed in the Work Plan.**

Response to Comment:

According to Ms. Michelle Glenn, this comment does not have to be addressed. Therefore, no changes were made to the Work Plan.

8. **No comment, the Work Plan describes the Sampling and Analysis Plan.**

Response to Comment:

No response necessary.

9. **The requirements for project closeout are not addressed in the Work Plan.**

Response to Comment:

The requirements for project closeout have been added to Section 4.0 of the Work Plan.

SPECIFIC COMMENTS:

1. **Add a legend to Figure 2-1.**

Response to Comment:

Upon review of Figure 2-1, it is not clear as to what USEPA wants included in the legend to this figure. The figure is a typical site location map indicating the location of the Hadnot Point Industrial Area (HPIA). Everything appears to be indicated on the map in addition to being mentioned in the text. A legend may not be necessary. No changes have been made to this figure.

2. **Add a more comprehensive legend to Figure 2-2.**

Response to Comment:

Upon review of Figure 2-2, it is not clear as to what USEPA wants added in the legend to this figure. The figure is a site map showing the significant areas within HPIA, other nearby sites, and groundwater elevations. Everything appears to be indicated on the map and mentioned in the text. No changes have been made to this figure.

3. **Explain why the 1991 compound concentrations were generally lower than the**

concentrations detected in the earlier studies, Section 2.5, page 2-6.

Response to Comment:

There is no apparent reason why the shallow groundwater concentrations were lower in 1991. However, deep groundwater quality showed an improving trend after the potable supply wells near the HPIA were shut down in the mid-1980's. An explanation has been added to Section 2.5 to explain this reason.

4. **Cannot assume that 5 gpm withdrawal rate will be achieved during the operation of the treatment system since the aquifer test pumping achieved only 1.5 gpm.**

Response to Comment:

The text has been revised to explain that a step-down test will be performed once the wells have been installed. This information will be used to determine if additional recovery wells are required to contain the plumes of each recovery well to determine its actual well yield. If the well yield is too low a new well location will be selected.

5. **Unclear if the "gravity separation system" referred to in Section 3.1.2, page 3-2 is the same as the "oil/water separation system" or not.**

Response to Comment:

Sections 3.1.1 and 3.1.2 have been revised to note that the treatment system includes an oil/water separator and a gravity settling tank.

6. **Contradictory sentences in Section 3.1.2, paragraph 2, page 3-2. In addition, inorganic removal will be required as a pretreatment step.**

Response to Comment:

The text has been revised as requested. Section 3.1.2 now includes a brief discussion of the inorganic removal system (polymer feed system with flocculation tank followed by solids settling, and filtration).

7. **Based on agreement reached during the March 23, 1993 meeting, carbon adsorption will be required in the treatment system. Paragraph 3, Section 3.1.2 on page 3-2 states that carbon adsorption will not be required.**

Response to Comment:

The text has been revised as requested. Section 3.1.2 now indicates that carbon adsorption with bypass piping will be included in the system.

8. **Clarify what the treatment system operating parameters are - referred to in Section 3.2, paragraph 6, page 3-2.**

Response to Comment:

Section 3.2 has been revised to indicate that the effluent from the treatment system will meet the Federal and/or North Carolina groundwater standards.

9. **Include a table to Section 3.2 listing the treatment system influent concentrations along with the effluent concentrations.**

Response to Comment:

Table 3-1 has been revised to include the anticipated influent and effluent treatment system concentrations.

10. **Table 3-1 on page 3-3 should include both primary and secondary drinking water criteria.**

Response to Comment:

Table 3-1 (now Table 3-2) has been revised to include both primary and secondary drinking water criteria.

11. **The third bullet in Section 4.1, page 4-1 should state that the technical requirements of all permits must be met.**

Response to Comment:

The third bullet in Section 4.1 has been revised to indicate that the technical requirements of all permits required will be met.

12. **The last sentence on page 4-3 (Section 4.4) should be clarified.**

Response to Comment:

See response to comment 11. above. The text has been revised to indicate that the technical requirements of all permits required will be met.

13. **Include EPA and the State of North Carolina in the pre-final inspection mentioned in Section 4.7.1 on page 4-4.**

Response to Comment:

The first sentence in Section 4.7.1 has been revised to indicate that the USEPA and the State of North Carolina will attend the pre-final construction conference and inspection.

14. **Include training requirements for operators on Table 5-1, page 5-2.**

Response to Comment:

Table 5-1 has been revised to include training for operators.