

State of North Carolina
 Department of Environment,
 Health and Natural Resources
 Division of Solid Waste Management



James B. Hunt, Jr., Governor
 Jonathan B. Howes, Secretary
 William L. Meyer, Director

September 30, 1994

Commander, Atlantic Division
 Naval Facilities Engineering Command
 Code 1823-1

Attention: MCB Camp Lejeune, RPM
 Ms. Linda Saksvig, P. E.
 Norfolk, Virginia 23511-6287

Commanding General

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

RE: Feasibility Study and Proposed Remedial Action Plan
 for Operable Unit # 5, Site 2

Dear Ms. Saksvig:

Attached please find comments provided to the NC Superfund Section
 by our sister agencies for the above referenced documents.

Please let me know if you have any questions about this.

Sincerely,

Patrick Watters

Patrick Watters
 Environmental Engineer
 NC Superfund Section

Attachment

cc: Preston Howard, DEHNR
 Gena Townsend, US EPA Region IV
 Neal Paul, MCB Camp Lejeune
 Bruce Reed, DEHNR - Wilmington Regional Office

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A. Preston Howard, Jr., P.E., Director



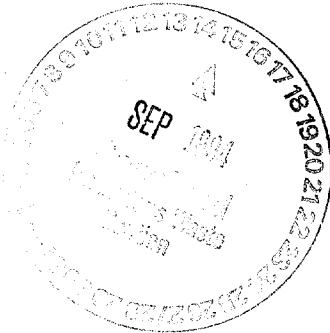
September 23, 1994

MEMORANDUM

TO: Jerome Rhodes, Chief
Hazardous Waste Section

FROM: Preston Howard *PH*

SUBJECT: Camp Lejeune
FS Remedial Action Plan for Operable Unit #5
Onslow County
Project No. 94-32



The Division of Environmental Management has completed the review of the subject document and offers the following comments and recommendations at this time.

Air Quality

Comments on the FS: The purpose of the FS is to ensure that appropriate remedial alternatives are developed and evaluated. Remedial Action Alternative (RAA) No. 3 consists of an air stripping unit (page 4-6 of FS). RAA No. 6 is an air sparging/soil vapor extraction system which is designed to withdraw and release vapors to the atmosphere (page 4-12).

If the selected RAA involves air pollution control equipment (APCE) (carbon adsorption of a volatilized airstream, for example), then an air permit is required. If the alternative does not involve APCE, then a permit is not required.

All selected remedial alternatives which emit air pollutants must be registered with the appropriate regional office (DEM). Registration information for this project should be sent to the WiRO and include the following:

- Name of Company Operating Source
- Principal Contact
- Location of Source (ADDRESS)
- Site Diagram (system + roads, homes, building and streams)
- Project Description - system description
- Parameters (CFM/GPM) - stk ht - fuels - if applicable
- Emission Estimates - release rates

- (amount (pph & ppd) and kind (benzene, toluene, xylene, etc)).
- Calculations of Emission Estimates
- Commitment to Notify DEM if Emissions Increase
- Projected Duration of Project (Months/Years)

Questions concerning remediation project registration may be directed to Mr. John Anderson, (910) 395-3900 (WiRO).

Comments on the PRAP: The preferred RAA for Site 2 is No. 2, Limited Action. This alternative, if selected, does not require an air permit, nor registration since the principal components of this RAA include institutional controls such as long-term monitoring, aquifer use restrictions, and deed (land use) restrictions.

If another treatment alternative (RAA) presented in the report is selected, then the Air Quality Section may require that the project be registered with the Wilmington Regional Office.

Water Quality

No comments at this time.

Groundwater Section

Comments on the FS: The Groundwater Section has no comments to offer.

Comments on the PRAP: The report states that the selected RAA for Operable Unit No. 5 is RAA No. 2, Limited Action. This RAA consists of implementation of a long-term monitoring program on-site wells and nearby potable water supply water wells, and restricting the installation of new potable water supply wells in the vicinity of the site. Furthermore, the report states on Page 40 that "CERCLA regulations provide for a number of circumstances in which a waiver can be invoked. These include the inconsistent application of State requirements. The North Carolina Administrative Code (T15A: 02L.0106[k]) includes criteria for requesting that the State approve a corrective action plan without requiring groundwater remediation to State standards (e.e., NCWQS)". The elements comprising the criteria of 15A NCAC 2L.0106(k) have been included in the PRAP, starting on page 27. The request for limited action will need to be sent to the Director of DEM for approval. The request should be made under 15A NCAC 2L .0106 and follow all procedures in, and guidelines as associated with, those rules.

The consultant's answer to the question concerning the plume's possible intersection with surface waters is weak. The consultant states that there is no indication, from the monitoring well network, that contaminants have migrated off site to a surface water

body. The consultant should have performed modelling that showed that 2L standards would be met within one year time of travel upgradient from any receptor. This determination should be based on the travel time and natural attenuation capacity of the contaminant or on a physical barrier to groundwater migration that currently exists or will be installed. The consultant suggests that migration will not be a problem based upon the low levels of contamination combined with the low seepage rates reported for the site.

The Navy should transmit a copy of the PRAP to the Onslow County Health Director.

If there are any questions, please advise.

APHjr/sbp/94-32.swm

cc: Alan Klimek
Steve Tedder
Wilmington Regional Office
Central Files
Groundwater Section Files