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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

October 27, 1994

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823-2

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: Draft Final Interim RI/FS & PRAP for Operable
Unit # 10

Dear Ms. Landman:

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

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

Sincerely,

Patrick Watters

Patrick Watters
Environmental Engineer
NC Superfund Section

Attachment

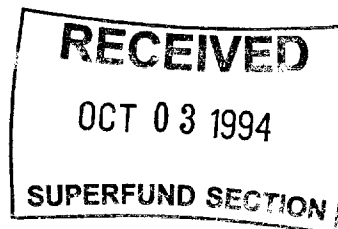
cc: Preston Howard, DEHNR
Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune
Bruce Reed, DEHNR - Wilmington Regional Office

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

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
A. Preston Howard, Jr., P.E., Director



September 26, 1994



MEMORANDUM

TO: Jack Butler, Head
Remediation Branch

FROM: Preston Howard *PH*

SUBJECT: Camp Lejeune
Draft Interim Remedial Action ROD for Operable Unit #10
Onslow County
Project No. 94-37

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

Air Quality Section

The selected Remedial Action Alternative (RAA), either RAA 3,5, or 6, for Site 36 MAY include treatment of the volatilized organic contaminants (activated carbon or catalytic oxidation). If a treatment system which qualifies as air pollution equipment (ACPE) is selected, then an air quality permit is required. If the selected RAA does not involve ACPE, then an air quality permit is not required, although registration of the project may still be required (airstrippers must be registered, for example).

Pages v, vi, and 14 of the report will be copied and retained on file by the Air Quality Section and will be available to the public. If this is unacceptable to Camp Lejeune, then Camp Lejeune or Baker Environmental must contact NC DEHNR.

Questions concerning remediation project registration may be directed to Mr. John Anderson at (910) 395-3900. Questions concerning air quality rules permitting requirements may be directed to Mr. Anderson or to the DEM, Air Permits Branch, Raleigh, (919) 733-7015.

Water Quality Section

The Groundwater Section does not object to the referenced

selection RAA 3,5, or 6. If an RAA is selected that utilizes on-site treatment methods such as landfarming or containment, a soil remediation permit must be obtained from the Wilmington Regional Office Groundwater Section.

The necessity for this interim measure is for highway construction expansion which will trend across the site. The document references that petroleum contaminated soils, found above the seasonal high water table, will be removed and treated/disposed. The document states that most of the soil contamination at the site is a function of a dissolved phase groundwater contaminant plume and seasonal fluctuations of the water table. If this is true, the responsible party and the Superfund Section need to be advised that it is our opinion that contamination of the soil may reoccur if the soil contamination is derived from these sources. The responsible party may want to consider a no action alternative to soil removal until groundwater remediation has been achieved.

If there are any questions, please advise.

APHjr/sbp/CAMP1.SWM

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