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DEPARTMENT OF THE NAVY

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United States Environmental Protection Agency, Region IV
Attn: Ms. Gena Townsend
Waste Management Division, Federal Facilities Branch
Atlanta Federal Center
100 Alabama Street, S.W.
Atlanta, Georgia 30303-3104

Re: MCB Camp Lejeune Response to Comments Draft
Basis of Design, Phase 1 Operable Unit
Number 10 (Site 35)

Dear Ms. Townsend:

Enclosed please find Navy/Marine Corps responses to your comments dated May 13, 1997 on the subject document. These responses have been incorporated into the final version of the document submitted on August 14, 1997.

Please direct any questions or comments to Ms. Katherine Landman at (757) 322-4818.

Sincerely,

L. G. Saksvig
L. G. SAKSVIG, P.E.

Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Enclosure

Copy to: (w/encls)
NC DEHNR (Mr. Dave Lown)
MCB Camp Lejeune (Mr. Neal Paul, Mr. Mick Senus)
Baker Environmental, Inc. (Mr. Matt Bartman, Mr. Dan Bonk)
Activity Admin Record File

**Response to USEPA Comments by Gena Townsend dated May 13, 1997
on Draft Basis of Design for Phase I Interim Remedial Action
Operable Unit No. 10, Site 35**

Response to General Comments

1. Section 1.1, Page 1-1, Paragraph 5 states that one of the objectives of the Interim Remedial Action is to assess the impact of air emissions on human health and the environment and verify that air emissions will not impact the proposed highway project. However, this objective is not met. The impact of air emissions on human health and the environment as it relates to the proposed highway project is not discussed. The document should include a discussion of the aforementioned issue so that this objective can be met.

Response: The Basis of Design has been revised to discuss the impact of air emissions as they relate to the highway project. Ambient air monitoring will be conducted as part of an interim remedial action at points surrounding the IAS trench, especially between the trench and the proposed right-of-way. The goal of this air monitoring will be to determine if operation of the air sparging system impacts air quality.

2. Section 3.3, Page 3-4, Paragraph 2 discusses performance and monitoring requirements. However, the monitoring of CO₂ and O₂ levels in soil vapors is not addressed.

Response: The reference cited (Angell, 1992) in the comment recommends that an air sparging design include provisions for monitoring carbon dioxide and oxygen levels in soil vapor as a gauge of biological activity. The air sparging trench in this instance is intended to serve as a barrier through which contaminated groundwater can pass and the contaminants removed. The system is not designed to stimulate biological activity upgradient or downgradient although this may occur. The level of biological activity outside of the trench will, therefore, not provide useful data from which this remediation system can be evaluated. Consequently, provisions for monitoring carbon dioxide and oxygen in soil vapor have not been included in the Basis of Design or the specifications.

Response to Specific Comments

1. Section 2.3.5.1, Page 2-7, Paragraph 6, Sentence 2:

The text states that the draft PRAP detailed five Remedial Action Alternatives (RAAs) described in the Feasibility Study for the remediation of organic contamination of the surficial aquifer. However, Section 2.3.5, paragraph 2, states that six instead of five RAAs were listed.

Response: The text in Section 2.3.5.1 has been revised to note six RAAs, not five.

2. Appendix A, Page 2: Estimated costs for the IAS trench needs to be adjusted from \$49,100 to \$49,850.

Response: The cost estimate has been modified as per the comment.

3. Appendix A, Page 3: The total direct and indirect costs should be \$356,024 instead of \$275,311.

Response: After making the modifications noted in Comments 2 and 4, the total direct and indirect costs should be \$357,392. The cost estimate has been modified accordingly.

4. Appendix A, Table 1: Table 1 shows the cost estimate for the direct general costs for the installation of an IAS trench. However, the total preconstruction submittal costs of \$6,400 is incorrect and should be \$6,840.

Response: Table 1 and page 1 of the cost estimate have been revised as per the comment. These changes also impacted the overall cost estimate (i.e., Pages 1 through 3 of Appendix A) which resulted in additional modifications.

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