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NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT

December 8, 1997

JAMES B. HUNT JR.  
GOVERNOR

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Commander, Atlantic Division  
Naval Facilities Engineering Command  
Code 1823

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: Comments on the Draft Remedial Action Work Plan for  
Phase I Interim Air Sparging Remediation System  
Operable Unit 10, Site 35  
Marine Corps Base, Camp Lejeune, North Carolina

Dear Ms. Landman:

The referenced document has been received and reviewed by the North Carolina Superfund Section and our comments are attached. Please call me at (919) 733-2801, extension 278 if you have any questions.

Sincerely,



David J. Lown, LG, PE  
Geological Engineer  
Superfund Section

Attachment

cc: Gena Townsend, US EPA Region IV  
Neal Paul, MCB Camp Lejeune  
Diane Rossi, DEHNR - Wilmington Regional Office

North Carolina Superfund Section Comments  
Draft Remedial Action Work Plan  
Phase I Interim Air Sparging Remediation System  
OU 10, Site 35, MCB, Camp Lejeune

1. Page 4-4, Section 4.4.3 **Horizontal Air Sparging Piping Placement and Backfill**. In the absence of TCLP testing to determine regulatory levels, the following levels, in the third column of the table below, are considered hazardous waste and cannot be used for backfill:

Constituent	TCLP Regulatory Level for Leachate (mg/L)	Corresponding Soil Level - Leachate Level x 20 (mg/kg)
Benzene	0.5	10
Toluene	ND	ND
Ethyl benzene	ND	ND
Xylene	ND	ND
Tetrachloroethylene	0.7	14
Trichloroethylene	0.5	10
Vinyl chloride	0.2	4

ND - Not determined.

Soils that contain constituents that are above levels that present a risk to public health and the environment, and/or are not protective of groundwater, must be handled accordingly.

Also, to be used as backfill, TPH levels must be below 10 ppm for gas-, 40 ppm for diesel- and 250 ppm for oil and grease-contaminated soils.

2. We concur with EPA's general comment 5 (letter dated 11/24/97), consideration should be given to adding additional monitoring wells upgradient of the sparging trench.