04.01-07/17/92-00792

(840) 445-2931

5090 1823:BCB:clt 1.7 JUL 1999

CERTIFIED MAIL RETURN RECEIPT REQUESTED

North Carolina Department of Environment, Health, and Natural Resources Post Office Box 27687 Attn: Mr. Jack Butler 401 Oberlin Road Raleigh, North Carolina 27611

> Re: MCB Camp Lejeune Installation Restoration Program; Treatment of TCE Contaminated Groundwater at the Hadnot Point Wastewater Treatment Plant

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Dear Mr. Butler:

As discussed in our meeting with you and EPA Region IV representatives on 28 and 29 April 1992 aboard Marine Corps Base Camp Lejeune, we have finalized a report entitled "Interim Remedial Action Proposed Plan for the Shallow Aquifer at the Hadnot Point Industrial Area Operable Unit." Our preferred alternative for remediation of the shallow aquifer involves utilizing the Hadnot Point Wastewater Treatment Plant (WTP) to treat chlorinated solvent contaminated groundwater from the Hadnot Point Industrial Area (HPIA) shallow aquifer.

As previously stated in our letter dated 6 April 1992, we assert that the TCE contaminated groundwater in the HPIA shallow aquifer should not be considered a listed hazardous waste. EPA Region IV's response, in a letter dated 14 April 1992, was that "if wastewater enters a surface impoundment at any time in the treatment process the RCRA regulations would apply (as) an 'Applicable or Relevant and Appropriate Requirement.'"

Nonetheless, in the meeting referenced above EPA Region IV representatives indicated that the 40 CFR 261.3 allows the exclusion of the listed hazardous waste provisions for wastewater if the generator can demonstrate that the maximum weekly usage of these solvents divided by the average weekly flow of wastewater into the headworks of the wastewater treatment plant does not exceed one (1) part per million (ppm). Although we do not consider the TCE-contaminated groundwater in the HPIA shallow aquifer as "wastewater", an analogy can be drawn between the treatment of contaminated wastewater and contaminated groundwater. As agreed during the referenced meeting, we are providing calculations detailing the theoretical concentrations of chlorinated solvents at the headworks of the Hadnot Point WTP. Please find enclosed our Chlorinated Solvents Concentration Calculations package, which details Marine Corps Base Camp Lejeune information regarding hazardous material purchases, hazardous waste disposal, and Hadnot Point WTP flows for calendar year 1991. These calculations were prepared in accordance with 40 CFR 261.3. The results of these calculations demonstrate MCB Camp Lejeune potentially has 0.372 ppm of chlorinated solvent in the flow to the wastewater treatment plant. As discussed in the enclosure, this calculation is very conservative, predominantly because all the solvents were assumed to process through the Hadnot Point WTP, rather than being split among the seven (7) wastewater treatment plants aboard the Base. Complete supporting documentation for the enclosure is maintained at MCB Camp Lejeune and available for review.

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More accurate information that strongly supports the enclosed calculations can be found in the report previously submitted to you entitled "Draft Supplemental Document to the Interim Remedial Action Focused Feasibility Study for the Shallow Aquifer at the Hadnot Point Industrial Area Operable Unit." In Chapter 3 of the above-mentioned document, Table 3-4 reports the results of three (3) 12-hour composite samples of the influent to the Hadnot Point WTP. These composite samples were taken by Baker Environmental, Inc personnel on 4-6 February 1992 to support the Interim Remedial Action Proposed Plan. TCE was detected in only one of these samples at a concentration of one (1) part per billion.

Based on the enclosure and the aforementioned submitted report, the concentration of chlorinated solvent at the headworks of the Hadnot Point WTP during treatment of the contaminated groundwater from the HPIA shallow aquifer should be well below one part per million (ppm). Thus, if an analogy between the treatment of TCEcontaminated wastewater and TCE-contaminated groundwater is made, the treatment of TCE-contaminated groundwater from the HPIA shallow aquifer at the Hadnot Point WTP would be allowable.

In order to maintain our expedited schedule for this action, we request your written confirmation of this interpretation by 29 July 1992. If you have questions or comments, please contact Mr. Byron Brant, MCB Camp Lejeune Remedial Program Manager, at (804) 445-2931.

Sincerely,

P. A. RAKOWSKI, P.E. Head Environmental Programs Branch

Environmental Quality Division by direction of the Commander Encl: Chlorinated Solvents Concentrations Calculations Package

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Copy to: MCB Camp Lejeune (AC/S, Environmental Management) EPA Region IV (Attn: Ms. Michelle Glenn) EPA Region IV, RCRA (Attn: Mr. John Lank)

Blind copy to: (w/ encl) 1823 (BCB)(2 copies) Administrative Record MCB Camp Lejeune

(w/o encl) 182 185

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MARINE CORPS BASE, CAMP LEJEUNE HADNOT POINT WASTEWATER TREATMENT PLANT CHLORINATED SOLVENT (F001 AND F002) CONCENTRATION CALCULATIONS PACKAGE

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(Extended Market

CY 1991

Annual Chlorinated Solvent Purchases 378 Gallons Annual Chlorinated Solvent Listed HW Shipped Out for Disposal - <u>257 Gallons</u> CY 1991 Annual Chlorinated Solvent Usage 621 Gallons

Yearly Average (CY 1991) Hadnot Point Wastewater Plant Flow:

4.575 MGD * 365 Days/Year = 1670 Million Gallons/Year Solvent Exclusion Calculation:

<u>621 Gallons/Year Chlorinated Solvent</u> = 3.72×10^{-7} 1,670,000,000 Gallons/Year Wastewater

or

.372 parts per million (ppm)

0.372 ppm is a conservative calculation and is substantially below the 1 ppm exclusion limit.

CONSERVATIVE ASSUMPTIONS UTILIZED IN CALCULATING THE CHLORINATED SOLVENT CONCENTRATION CALCULATIONS PACKAGE

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- All chlorinated solvent purchases were included in the calculation.
- Calculations are on an annual basis. Weekly hazardous material purchase information is not readily available and would not reflect actual total weekly usages.
- Listed chlorinated hazardous wastes (F001 and F002) were obtained from the CY 1991 Environmental Protection Agency (EPA) hazardous waste report and combined for the exclusion calculation.
- The HW solvent exclusion calculation was based on not exceeding one part per million, even though several solvent purchases could have been calculated using 25 parts per million.
- Marine Corps Base, Camp Lejeune operates seven separate wastewater treatment plants. For this calculation, all chlorinated solvent usage, after subtracting that disposed of as HW, is assumed to be treated at the Hadnot Point Wastewater Treatment Plant. Actually, chlorinated solvent usage and potential discharge would be split among all seven plants.
 - Conversion of listed HW reported on the CY 1991 EPA HW Report from pounds to gallons assumes an average chlorinated solvent density of 11.7 lb/gal.

GENERAL INFORMATION FOR THE CALCULATION OF HAZARDOUS MATERIAL IN GALLONS UTILIZED IN CALENDAR YEAR (CY) 1991 ABOARD MARINE CORPS BASE, CAMP LEJEUNE

CAN = 12 oz

1 PINT = 16 oz

1 DRUM = 55 gal

128 oz = 1 gal

TOTAL GALLONS:

123 (12 oz CANS OF TRICHLOROETHANE) = 11.5 gal

(a)1966(**1**/b)

148 (GALLONS of RIFLE BORE CLEANING COMPOUND) = 148 gal

30 (16 oz PINTS OF DEGLAZING SOLVENT) = 3.75 gal

13 (55 GALLON DRUMS of DRY CLEANING SOLVENT TYPE II) = 715 gal

TOTAL = 878.2 gal

TOTAL = 878 GALLONS

METHODOLOGY FOR COMPILING THE HAZARDOUS MATERIAL QUANTITY

1. Reviewed Logistics purchasing information for potentially chlorinated compounds.

2. Utilized the Navy computerized Hazardous Material Information System to generate Material Safety Data Sheets (MSDS's) for each potentially chlorinated compound.

3. Utilized MSDS's to screen potentially chlorinated compounds and determine actual chlorinated compounds.

4. Compiled a list of chlorinated solvent purchases.

5. Created a spreadsheet using the CY 1991 chlorinated solvent purchases.

6. Calculated the total gallons of chlorinated Hazardous Material purchased for CY 1991.

CHLORINATED SOLVENT AVERAGE DENSITY CALCULATIONS

CHLORINATED SOLVENT	SPECIFIC GRAVITY
tetrachloroethylene (perchloroethylene)	1.625
trichloroethylene	1.456
carbon tetrachloride	1.595
chlorobenzene	1.107
methylene chloride	1.335
111 trichloroethane	1.325

Average S.G. = 1.40

1.40 * 8.342 lb/gal water = 11.7 lb/gal Average Chlorinated Solvent Density

Chemical Densities Taken From: Condensed Chemical Dictionary Tenth Edition Revised by Gessner G. Hawley Van Nostrand Reinhold Company, 1981.

CHLORINATED SOLVENT HAZARDOUS MATERIAL

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PLANT: HADNOT POINT PERMIT #: NC0063029

YEAR: 1991

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NPDES MONITORING DATA MONTHLY AVERAGES

	SAMPLE MONTH	FLOW	DO	CL2	BOD	BOD EFF	TSS INF	TSS EFF	pH MIN	pH MAX	CEL		NITROGEN		FECAL	OIL/ GREASE	
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RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE FROVIDED NOT FOR INTERNATIONAL MAIL

	(See Reverse)					
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