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State of North Carolina
Department of Environment, Health, and Natural Resources
Division of Solid Waste Management
P.O. Box 27687 · Raleigh, North Carolina 27611-7687

James G. Martin, Governor
William W. Cobey, Jr., Secretary

William L. Meyer
Director

September 15, 1992

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1822
Attention: MCB Camp Lejeune, RPM
Mr. Byron Brant
Norfolk, Virginia 23511-6287

Commanding General
Attention: AC/S, Environmental Management
Building 1, Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

RE: MCB Camp Lejeune, Draft Record of Decision for the Interim Remedial Action,
Shallow Aquifer at the Hadnot Point Industrial Area, NC 6170 022 580

Dear Mr. Brant:

The North Carolina Superfund Section would like to thank you and all those involved for their time, patience, and valuable input to the process of selecting a treatment alternative for this specific remediation effort. We hope that you will find this proposal acceptable.

The Superfund Section has consulted with other sections of the NC DEHNR, including the Division of Environmental Management. Based on these consultations and continued discussions with the Navy, LANDIV, and the EPA, we are requesting revisions to the referenced document:

Air stripping shall be included as part of the treatment process for extracted groundwater. This can be accomplished by choosing alternative #4 as the preferred alternative. It should be noted that an Activated Carbon Unit may be required to meet standards of the NC DEHNR as outlined in this letter. This will be determined during a Bench Study.

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The remedial design phase should also incorporate the following studies and criteria for establishing the actual Remedial Treatment.

Bench Study

A Bench scale study shall be performed prior to construction of the actual treatment facility. This bench scale study should be similar to that described in Item #1 of your letter dated 8 July 1992. This study should simulate the effluent at the air stripping tower (influent to the activated carbon unit) and the effluent from a simulated activated carbon unit.

Testing, Frequency, and Analysis

Thirty (30) days of operations data for contaminants of concern, BTEX and TCE, will be required. In addition, long term monthly monitoring of the contaminants of concern will be required.

Multi-concentration acute toxicity tests of the influent and effluent (obtained at the same time) of the Activated Carbon Unit will be performed one time using methods described by United States Environmental Protection Agency, 1991, Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms, Fourth Edition, EPA/600/4-90-027. 292 pp. with fathead minnow (*Pimephales promelas*) as the test organism. These analyses must be conducted by a laboratory certified for such tests by the State of North Carolina.

Discharge Requirements

Effluent from the Groundwater Treatment system discharged to the Hadnot Point Industrial Area sewer system shall meet the following standards:

Toxicity

Toxicity levels must be "acceptable" to the NC DEM Water Quality Section. The term "acceptable" implies that no level is being established at this time. It is understood that the HP STP is currently not meeting toxicity levels as established in the NPDES permit, and the DEM is reserving their right to make a decision until more data is obtained from the HP STP and the Bench Study. In no case will toxicity levels be required to be lower than that established in the existing NPDES Permit.

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NC Groundwater Standards

Effluent flowing at any point in a cracked, loose, or open jointed sewer pipe shall meet NC Standards for Groundwater for the contaminants of concern. Dilution due to mixing of other waste flows will be acceptable in reducing contaminant levels.

NC Surface Water Standards

Effluent discharged to sewer lines that are relined, replaced, or otherwise refurbished and inspected, to assure leakage will be kept to a minimum, shall meet NC standards for surface water.

In accordance with Section XVI, Part A of the Federal Facilities Agreement, effective this date, Mr. E. Peter Burger shall be the designated Project Manager and Mr. Jack Butler shall be the Alternate. If you have any questions, please contact Peter Burger at (919) 733-2801.

Sincerely,



Jack Butler, PE
Environmental Engineering Supervisor
Superfund Section

JB/PB/dk/18

cc: Michelle Glenn, US EPA Region IV
George Radford, MCB Camp Lejeune