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Admin.

DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
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IN REPLY REFER TO:

5090
18232:KHL:cag

NOV 21 1994

CERTIFIED MAIL RETURN RECEIPT REQUESTED

North Carolina Department of Environment,
Health, and Natural Resources
Attn: Mr. Patrick Watters
P.O. Box 27687
401 Oberlin Road
Raleigh, NC 27611

Re: MCB Camp Lejeune, Response to NC DEHNR
Comments Draft Interim ROD Operable
Unit Number 10 (Site 35)

Dear Mr. Watters:

Attached are Navy/Marine Corps responses to comments provided by your Air Quality and Water Quality sections on the above-referenced document. Please note that although these comments pertain to the Draft Interim ROD, our responses reflect the remedial alternative selected in the Final Interim ROD, issued August 31, 1994 and signed September 15, 1994 by the Commanding General, MCB Camp Lejeune. NC Superfund Section concurrence on the Final Interim ROD was provided September 27, 1994.

Please direct any questions to Ms. Katherine Landman at (804) 322-4818.

Sincerely,

L. A. BOUCHER, P.E.
Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Attachment

Copy to: (w/encls)
EPA Region IV (Ms. Gena Townsend)
CG MCB Camp Lejeune (Mr. Neal Paul)
Baker Environmental, Inc. (Mr. Ray Wattras, Mr. Dan Bonk)
Activity Admin Record File

Quality Performance . . . Quality Results

**RESPONSE TO COMMENTS SUBMITTED BY
PATRICK WATTERS, NC DEHNR
DRAFT INTERIM ROD, SITE 35, OPERABLE UNIT NO. 10
LETTER DATED OCTOBER 27, 1994**

GENERAL

1. Note that while the October 27, 1994 letter indicated that comments provided pertained to the Draft Final Interim RI/FS & PRAP for Operable Unit #10, the attached memorandum from Preston Howard to Jack Butler, dated September 26, 1994, referred to the Draft Interim Remedial Action ROD for Operable Unit #10. The responses to comments included here refer to the Final Interim ROD for Operable Unit #10. Note that by the date of this memorandum (September 26, 1994), the Final Interim ROD had already been issued (August 31, 1994) and signed by the Commanding General, MCB Camp Lejeune (September 15, 1994). NCDEHNR Superfund Section provided concurrence one day later (September 27, 1994), prior to receipt of these comments.

2. For convenience, the selected remedy as stated in the Final Interim ROD for Contaminated Soil, Operable Unit No. 10, Site 35 (dated August 31, 1994) is summarized here:

The selected remedy is identified as RAA 5, Source Removal and Off-Site Soil Recycling. The ROD identified 6 remedial action alternatives that were considered. These alternatives are listed below, with their associated estimated cost of implementation:

RAA 1: No Action	\$0
RAA 2: Source Removal and Off-Site Landfill Disposal	\$527,390
RAA 3: Source Removal and Off-Site Biotreatment	\$558,366
RAA 4: Source Removal and On-Site Ex-Situ Soil Aeration	\$455,304
RAA 5: Source Removal and Off-Site Soil Recycling	\$558,366
RAA 6: Source Removal and On-Site Low Temperature Thermal Desorption	\$613,542

In general, RAAs 3, 5, and 6 were considered to be roughly technically equivalent overall. However, RAAs 3 & 5 appeared to be more cost effective than RAA 6. RAA 5 (off-site recycling) was selected in lieu of RAA 3 (off-site biotreatment) primarily because there are more commercial soil recycling facilities that service the Camp Lejeune area than biotreatment facilities, so it was assumed that RAA 5 (off-site soil recycling) would be easier to implement.

RESPONSE TO AIR QUALITY SECTION COMMENT

1. Permits and Registration of Air Pollution Equipment

Comment generally does not apply to the selected final remedy because the selected remedy includes only excavation and transport to an off-site soil recycling facility. Since the selected remedy does not include any air pollution equipment or air strippers, then no permits or registration will be required.

Comment will be taken into consideration if at some point it becomes necessary to change the selected alternative and amend the ROD. At this time, this situation is not expected to occur. Please note that §300.400(e) of the National Hazardous Substances Pollution Contingency Plan (NCP) specifically states that no federal, state, or local permits are required for *on-site* response actions conducted under CERCLA. Permits would still be required, as applicable, for any off-site response activities taken.

RESPONSE TO WATER QUALITY SECTION COMMENTS

1. On-Site Treatment

Comment generally does not apply because the selected remedy includes only excavation and transport to an off-site soil recycling facility, and does not utilize on-site treatment methods. Therefore, a soil remediation permit will not be required.

Comment will be taken into consideration if at some point it becomes necessary to change the selected alternative and amend the ROD. At this time, this situation is not expected to occur. Please note that §300.400(e) of the National Hazardous Substances Pollution Contingency Plan (NCP) specifically states that no federal, state, or local permits are required for *on-site* response actions conducted under CERCLA. Permits would still be required, as applicable, for any off-site response activities taken.

2. Source of Soil Contamination and Possibility of Re-contamination

As stated in the Final Interim RI/FS, PRAP, and ROD for Site 35, the selected remedy targets 4 areas of petroleum contaminated soil found *above* the seasonal high water table. These are the areas that are to be excavated and sent to an off-site soil recycling facility. The selected remedy does not include excavation below the seasonal high water table because it is believed that these soils are subject to seasonal fluctuations of the groundwater table impacted by a dissolved phase groundwater contaminant plume. Thus, the soils *below* the seasonal high water table are considered to be part of the groundwater problem at the site, and are not included in this Interim ROD. Soils below the seasonal high water table will be included in an upcoming ROD that will result from currently on-going investigations concentrating on groundwater at Site 35.