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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

February 9, 1995

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Katherine Landman
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1823
Norfolk, Virginia 23511-6287

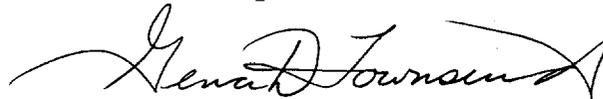
SUBJ: MCB Camp Lejeune
Draft Interim Feasibility Study
Groundwater
Operable Unit No. 10 - Site 35

Dear Ms. Landman:

The Environmental Protection Agency (EPA) has partially completed its review of the above subject document. Comments are enclosed. Comments from EPA's risk assessment will be forwarded by February 23.

If you have any questions or comments, please call me at (404) 347-3016 or voice mail, (404) 347-3555, x-6459.

Sincerely,



Gena D. Townsend
Senior Project Manager

Enclosure

cc: Patrick Waters, NCDEHNR
Neal Paul, MCB Camp Lejeune

1.0 GENERAL COMMENTS

The objective of the Draft Interim FS Report is to identify and evaluate remedial actions for contaminated groundwater in the vicinity of the Fuel Farm at Site 35 that will be protective of human health and the environment. The Site 35 - Camp Geiger Fuel Farm Area consists of five 15,000-gallon aboveground storage tanks, a pump house, a fuel loading/unloading pad, an oil/water separator and a distribution island. The fuel farm has been decommissioned and will be dismantled to make room for a six-lane divided highway proposed by the North Carolina Department of Transportation. The nature and extent of groundwater contamination at Site 35 has not been fully defined. Therefore, at a later date, a comprehensive FS that will consider remedial actions for the entire area of contaminated groundwater as well as other contaminated media will be conducted once the nature and extent of groundwater contamination at Site 35 has been determined. Numerous technologies and process options were screened and evaluated in the Draft Interim FS Report for Site 35 - Camp Geiger Fuel Farm Area. As the result of this screening and evaluation process, five Remedial Action Alternatives (RAAs) were developed for Site 35 and are as follows:

- RAA 1 - No Action
- RAA 2 - No Action with Institutional Controls
- RAA 3 - Groundwater Collection and OnSite Treatment
- RAA 4 - In Situ Air Sparging and Off-Gas Carbon Adsorption
- RAA 5 - In-Well Aeration and Off-Gas Carbon Adsorption

Standard pump and treat methods were eliminated as an RAA because the extraction/injection process may induce intolerable ground settlement below the proposed highway as the result of the fluctuations in the groundwater table.

The following are the general comments which Dynamac developed from its review of the Draft Interim FS Report:

1. The Draft Interim FS Report eliminates potentially feasible, cost-effective technologies generally referred to as passive treatment systems, citing as its reason that the passive treatment systems screened are only at the pilot scale state and are not currently available. The Superfund Innovative Technology Evaluating (SITE) Program Sixth Edition, identifies a specific passive treatment system which has been chosen as part of the selected remedy for a Superfund project in EPA Region I. Therefore, the Draft Interim FS Report should not indiscriminately eliminate passive treatment technologies as a potential RAA.

The statement should be removed which states that pilot scale studies are not available. In the future we should

include innovative technologies in the alternative screening.

2. Previous groundwater sampling at Site 35 indicated elevated levels of both dissolved and undissolved inorganic constituents in the surficial aquifer. The Draft Interim FS Report states that additional groundwater samples will be collected using a low-flow sampling technique to determine if these inorganic constituents are the result of site activities. If groundwater samples collected using the low-flow sampling technique indicates inorganic contamination that exceeds Applicable or Relevant and Appropriate Requirements (ARARs), additional RAAs should be proposed that will address both inorganic and organic contamination.

2.0 SPECIFIC COMMENTS

Section 3.0 of this TRC Report provides the specific comments on the Draft Interim FS Report. The specific comments for this TRC Report are listed on the following pages in the order of occurrence and are organized according to page, section and paragraph number.

1. Page 5-9, Section 5.1.4.1, Paragraph 2:
The text states that the radius of influence of an air sparging well is on the order of 25 feet and references EPA 1992. However, there is no EPA 1992 listed in the reference section. Please include this reference.
2. Page 5-12, Section 5.1.5.1, Paragraph 1:
The text states that an estimated 18 in-well aeration wells would be required at Site 35. Please indicate how the number of wells were estimated.