

03.01-06/12/95-01405

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Solid Waste Management



James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
William L. Meyer, Director

June 12, 1995

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1823-2

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: Draft RI and FS for Operable Unit 7 and the Draft
RI, FS, PRAP, and ROD for Operable Unit 10.

Dear Ms. Landman:

Attached please find the comments provided to the Superfund Section
by our sister agencies for the above referenced documents.

Regarding the need for an air quality permit, NC Superfund
acknowledges that such permits are not required for NPL sites.
Note however that the substantive requirements of the North
Carolina Air Quality regulations must be met. Please let me know
if you have any questions about this.

Sincerely,

Patrick Watters

Patrick Watters
Environmental Engineer
NC Superfund Section

Attachments

cc: Preston Howard, DEHNR
Gena Townsend, US EPA Region IV
Neal Paul, MCB Camp Lejeune
Bruce Reed, DEHNR - Wilmington Regional Office

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Environmental Management

James B. Hunt, Jr., Governor
Jonathan B. Howes, Secretary
A. Preston Howard, Jr., P.E., Director



May 23, 1995

MEMORANDUM

TO: Jack Butler, Head
Remediation Branch

FROM: Preston Howard *PH*

SUBJECT: Camp Lejeune
Draft RI, FS, PRAP and ROD for OU #10
Onslow County
Project No. 95-09

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SUPERFUND SECTION

The Division of Environmental Management has completed the review of the subject document and offers the following comments and recommendations.

Air Quality Section Comments

The selected preferred remedial action alternative is alternative 5 (RAA 5). The alternative includes carbon adsorption for control of volatilized organic compounds' [please read beginning of page 16-DIROD].

Since RAA 5 includes air pollution control equipment, an air quality permit is required. The statutory authority for air quality permits is found at NCGS 143-215.108. The facility (owner) may not build or operate an air pollution control device prior to receiving an air quality permit for the device.

Questions concerning this project or permitting requirements may be directed to Mr. John Anderson. Questions concerning permitting requirements may be directed to Mr. Kent Harrell, NCDEM, at (910) 395-3900.

Water Quality Section Comments

No comments at this time.

Groundwater Section Comments

Comments on the RI:

We agree that the assessment of the groundwater found in the lower portion of the surficial aquifer is incomplete. It appears to us that a substantial amount of work is still needed at this site, and as the consultant has stated, sources of contamination may reside outside the bounds of this Operable Unit. The Division would also like to see assessment on the east side of Brinson Creek.

Comments on the FS, PRAP, and ROD:

The reports state that the selected remedial action alternative concerning the surficial groundwater at this site is "In Well Aeration and Off-Gas Carbon Adsorption" or UVB. Groundwater remediation in the State is covered under 15A NCAC 2L. Section .0106(j) of this rule states that a "best available technology" be used for the active remediation of contaminated groundwater. We are not familiar with UVB as a proven remediation technology. A thorough review of UVB and its effectiveness should be conducted prior to implementation.

If it is determined that the UVB technology cannot be used at this site, we recommend that RAA 4 (In Situ Air Sparging and Off-Gas Carbon Adsorption), or RAA 3 (Groundwater Collection and On-Site Treatment) be implemented. The Navy's consultant appeared to shy away from the In Situ Air Sparging alternative because of the high water table. They stated that vapors may not be able to be completely captured by the SVE system, and thus some would escape to the atmosphere without being captured and treated by carbon. This off-gas issue is outside the realm of the Groundwater Section and would be best approached by a toxicological review.

If there are any questions, please advise.

APHjr/baw/camp10.doc

cc: Alan Klimek
Steve Tedder
Wilmington Regional Office
Central Files
Groundwater Section Files

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Department of Environment,
Health and Natural Resources
Division of Environmental Management

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JUN 06 1995

May 23, 1995

MEMORANDUM

SUPERFUND SECTION

TO: Jack Butler, Head
Remediation Branch

FROM: Preston Howard *PH*

SUBJECT: Camp Lejeune
Draft RI & FS for OU #7
Onslow County
Project No. 95-05

The Division of Environmental Management has completed the review of the subject document and offers the following comments and recommendations.

Air Quality Section Comments

Regardless of the alternative selected, the use or absence of air pollution control equipment or MCB's NPL CERCLA listing, the project must be registered with the NC DEHNR, Wilmington Regional Office. Registration is not difficult. In nearly all cases, when FS comparing alternative has been written or a report selecting an alternative has been written, the technical, geographic and general information needed to register a project is detailed in a report and a facility may register the project using the information.

Questions concerning remediation project registration may be directed to Mark Hedrick, NC DEM/AQS at (910) 395-3900, extension 289.

Water Quality Section Comments

The lead levels associated with the sites within Operable Unit No. 7 are a major concern as they appear to be or are likely to impact surface waters. The potential impact of the metals on surface water quality should be further evaluated as the project develops.

Groundwater Section Comments

Remediation Alternative Development and Evaluation may be found on pages ES-12 ES-16 of the report. If the corrective action selected is a no action option, control of primary and secondary sources of groundwater contamination must be demonstrated before a corrective action plan can be filed under 15A NCAC 2L.0106(k) or (l). If these subsections are not pursued or are pursued and not approved by the Division of Environmental Management's Director, then full restoration of groundwater by active methods to state standards is required.

Mention is also made to a new technology called "In-Well Aeration and Off-Gas Carbon Adsorption" or UVB. Groundwater remediation in the State is covered under 15A NCAC 2L. Section .0106(j) of this rule states that a "best available technology" be used for the active remediation of contaminated groundwater. We are not familiar with UVB as a proven remediation technology. A thorough review of UVB and it's effectiveness should be conducted.

If there are any questions, please advise.

APHjr/baw/camp7.doc

cc: Alan Klimek
Steve Tedder
Wilmington Regional Office
Central Files
Groundwater Section Files