04.01-06/09/93-01269

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

JUN 09 1993

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ms. Linda Berry
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1822
Norfolk, Virginia 23511-6287

RE: Marine Corps Base Camp Lejeune NPL Site
HPIA Shallow Aquifer
Jacksonville, North Carolina

Dear Ms. Berry:

EPA has reviewed the document titled "Draft Final Treatbility Study Report for the Shallow Aquifer at the Hadnot Point Industrial Area Operable Unit". Comments on the document are enclosed.

If you have any questions or comments, please call me at (404) 347-3016.

Sincerely,

Michelle M. Glenn

Michelle M. Glenn
Senior Project Manager

Enclosure

cc: Peter Burger, NCDEHNR
Neal Paul, MCB Camp Lejeune

COMMENTS

GENERAL COMMENTS

The Final Treatability Study Report addresses most of the EPA comments on the Draft Treatability Study Report. However, there are a few issues that should be clarified regarding the design of the treatment system. The Final Treatability Study Report states that during the installation of additional recovery wells, aquifer tests will be conducted to determine well yield. A description is not provided regarding the design of the proposed aquifer tests and the locations of the additional recovery wells. In addition, a description of how the new treatment system will be monitored to determine the recovery well system effectiveness should be provided.

The following general comments were developed from a review of the Final Treatability Study Report and the EPA General Comments (dated 4/16/93) on the Draft Treatability Study Report.

1. EPA General Comment No. 2 states that monitoring data should be presented to demonstrate the magnitude and cause of any oil and grease contamination at HPIA. The Final Treatability Study Report states that free phase oil and grease is visible as an oily sheen on the surface of the groundwater, and was detected in the bench-scale analytical results at 6 micrograms/liter (ug/l). However, the cause of the oil and grease contamination in the groundwater is still not explained.

2. EPA General Comment No. 6. states that the regulatory requirements for the air emissions produced by the air stripper and the treatment of the air emissions should be addressed. The Final Treatability study does address the regulatory requirements for air emissions on a basewide level and states that specific air emissions sources may not require treatment. However, the Final Treatability Study Report does not conclude whether treatment is required for the air stripper emissions.

SPECIFIC COMMENTS

1. Response to EPA Comment No. 1 on the Draft Treatability Study Report, Pages 1-4 and 5-9 - EPA's Specific Comment No. 1 states that the use of the January 1991 groundwater sampling analytical data is a poor choice because the Draft Treatability Study Report refers to the January 1991 compound concentrations as being "generally lower than the earlier studies." The EPA also requested that summaries of previous groundwater analytical data be presented and an explanation be provided regarding variations in concentration over time. However, the Final Treatability Study Report still does not provide summaries of previous groundwater analytical data.

2. Response to EPA Comment No. 7 on the Draft Treatability Study Report, Page 5-4 - EPA's Specific Comment No. 7 requested that the composition of the cationic and anionic polymers be provided. The Final Treatability Study Report states the brand name of the anionic and the cationic polymers used in the bench test. However, the specific chemical composition of the polymers is not presented.

3. Response to EPA Comment No. 11 and General Comment No. 7 on the Draft Treatability Study Report - EPA's Specific Comment No. 11 states that the quantity and chemical composition of the metal-bearing sludge wastes produced from the treatment process should be addressed. However, the Final Treatability Study Report does not provide data regarding this analysis and does not discuss the waste sludge disposal.