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NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WASTE MANAGEMENT

April 10, 2000



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1510 Gilbert Street (Building N-26)
Norfolk, Virginia 23511-2699

Attention: Ms. Katherine Landman, PE
Navy Technical Representative
Code 18232

Commanding General
Marine Corps Base
PSC Box 20004
Camp Lejeune, NC 28542-0004

Attention: AC/S, EMD/IRD

RE: NC Comments
Draft Design Package for Time Critical Removal Action
Statement of Work, Basis of Design, and Technical Specifications for
Remediation of VOC-Contaminated Soil
by Low-Temperature Thermal Desorption
Site 89, Operable Unit 16

Dear Ms. Landman:

The Superfund Section received and reviewed this document and our comments are attached. We appreciate the opportunity to review this document. If you have any questions or comments, please contact me.

Sincerely,

David J. Lown, LG, PE
Geological Engineer
Superfund Section

cc: Neal Paul, MCB Camp Lejeune
Gena Townsend, USEPA



NC Comments
Draft Design Package for Time Critical Removal Action
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Draft Statement of Work

1. Page 9, First list. The Region III Industrial RBC for Tetrachloroethene, Trichloroethene, and Vinyl Chloride are not correct. These values are correct in Table 1 of the Statement of Work.

Compound	Region III Industrial RBC (10/1999 Version)
Tetrachloroethene	110,000 ug/kg
Trichloroethene	520,000 ug/kg
Vinyl Chloride	3,000 ug/kg

2. Table 1. The North Carolina SSL (for gw protection) for cis-1,2-dichloroethene is 350 ug/kg.

Basis of Design

3. Page 5, First table. Units should be ug/kg not mg/kg. Some values are wrong. See correct values in Comment 1 above.
4. Page 7, Treated Soil Disposal. As stated, before going to a Subtitle D facility, the treated soil must pass a TCLP test. In addition, the soil totals must be lower than industrial risk-based levels (Region III or IX, which ever is more stringent). For compounds not listed in the TCLP test, the leachate must be less than 100 times the North Carolina groundwater standard. Soil totals that are less than 2000 times the groundwater standard do not require TCLP testing.

Preferably, each roll-off box is tested. If storage piles are used, see the Groundwater Section guidance (Section 8.0 of Groundwater Section Guidelines for Investigation and Remediation and Groundwater – Vol. 1, Sources Other than Petroleum Underground Storage Tanks) for information on sampling procedures.

5. Page 11, Item 3. As stated in Comment 4 above, for compounds at the site not listed in the TCLP test, the leachate concentration must be determined unless soil totals are less than 2000 times the groundwater standard.