

Baker

M67001.AR.004540
MCB CAMP LEJEUNE
5090.3a

Baker Environmental, Inc.
Airport Office Park, Building 3
420 Rouser Road
Coraopolis, Pennsylvania 15108

July 1, 1992

(412) 269-6000
FAX (412) 269-2002

Commanding Officer
Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511-6287

Attn: Mr. Byron Brant, P.E.
Code 1822

Re: Contract N62470-89-D-4814
Contract Task Order (CTO)-0017
Submittal of Draft Final Predesign Report for an Interim Remedial Action
for the Shallow Aquifer at the Hadnot Point Industrial Area Operable Unit
MCB Camp Lejeune, North Carolina

Dear Mr. Brant:

Enclosed please find three (3) copies of the above-referenced report for your review. Comments submitted by EPA Region IV have been incorporated into this report. In addition, sections of the text referencing the "Draft" Interim Remedial Action (IRA) Feasibility Study (FS) and Proposed Remedial Action Plan (PRAP) has been revised to reference the "Final" IRA, FS, and PRAP (see Section 1.0 and Table 2-1).

Copies of the report have been forwarded to Mr. George Radford - CLEJ EMD (3 copies), Mr. Jack Butler - DEHNR (1 copy), Mr. Preston Howard - DEHNR (2 copies), and Ms. Michelle Glenn - EPA Region IV (3 copies).

In addition to the report, responses to the EPA comments have been included as Attachment A to this letter. A copy of the responses has also been forwarded to Mr. George Radford and Ms. Michelle Glenn (stamped "Draft").

Upon receipt of all comments or until notified by LANTDIV, Baker will respond to the comments and prepare the Final Predesign Report. If you have any questions, please contact me at (412) 269-2016, or Ms. Tammi Halapin at (412) 269-2023.

Sincerely,

BAKER ENVIRONMENTAL, INC.



Raymond P. Wattras
Project Manager

RPW/lmn
Enclosures (3)

cc: Mr. Marc Lambert, P.E. (w/o enclosure)
Ms. Laurie Boucher, P.E. (w/o enclosure)
Mr. George Radford (w/enclosures)

ATTACHMENT A

RESPONSES TO COMMENTS SUBMITTED BY EPA REGION IV LETTER DATED 6/9/92

Responses to Comments - Draft Supplemental Document for the Interim Remedial Action Focused Feasibility Study for the Shallow Aquifer at the Hadnot Point Industrial Area Operable Unit

1. Retitling of the Document - The document has been retitled to "Predesign Report for an Interim Remedial Action for the Shallow Aquifer at the Hadnot Point Industrial Area Operable Unit"
2. Capacity of Existing Sanitary Sewer Lines - In agreement with this comment, Section 2.4.1 has been revised. The following text has been added to the second paragraph in this section: "Please note that LANTDIV plans to conduct a pilot-scale treatability study of the proposed treatment system. As part of this treatability study, flow studies of the existing sewer lines will be conducted to determine actual dry and wet weather flows."
3. Aerated Equalization Lagoon Efficiency - The following changes have been made to Section 4.1 to respond to this comment and to clarify the overall objective of the "Predesign Report":
 - The following sentence has been added to the second paragraph of Section 4.1, after the second sentence: "Based on Baker personnel observations during the February 4-6, 1992 wastewater sampling event, it appears that the floating aerators in the lagoon produce a fair to good amount of aeration."
 - The following text has been added to the end of the second paragraph in Section 4.1.3: "Please note that the overall objective of this report is to evaluate the feasibility of using the existing STP to treat the groundwater extracted from the HPIA Site. Therefore, the estimated/calculated removal efficiencies should not be considered as actual removal rates. Pilot-scale treatability studies will be conducted to better determine removal rates."

Baker did re-assess the VOC removals using a 60 percent removal efficiency. The results indicated that in only the worst-case situation (low flow), one compound was calculated to be above the discharge standards.

4. Trickling Filter Efficiency - In agreement that very little data is available for VOC removal in a trickling filter (as stated in the report in Section 4.3). From the available information, TCE removal as high as 98 percent has been reported. Based on observations of the trickling filters at the site, it is believed that some removal of VOCs should occur, if by volatilization alone (spraying of the water over the rock filter). Therefore, an estimate of 10 percent removal may even appear to be on the conservative side. The results of the pilot-scale treatability study to be conducted will determine the effectiveness of the trickling filters. The following sentence has been added to the end of the third paragraph in Section 4.3: "LANTDIV intends to conduct a pilot-scale treatability study to determine the efficiency."

Please note that as stated in Section 4.4.1 and shown on Table 4-8, even assuming a zero percent removal of VOCs by the trickling filter, the surface water standards will be met at "end of pipe".

5. Overall Removal Efficiency - The overall removal of VOCs from the existing system cannot be accurately determined prior to the performance of a treatability study. Please keep in mind that the overall objective of the Predesign Report was to determine the feasibility of implementing the existing Hadnot Point STP as part of the recommended remedial action at the site. The results of the pilot-scale treatability study will be used to determine the effectiveness of the existing treatment system. No changes to the text were made due to this comment.