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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

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4WD-RCRA & FFB

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RETURN RECEIPT REQUESTED

Commander, Atlantic Division  
Naval Facilities Engineering Command  
Code 1822  
Attn: Ms. Laurie A. Boucher, P.E.  
Remedial Project Manager for MCB Camp Lejeune  
Norfolk, Virginia 23511-6287

RE: RPM Meeting of October 16, 1991, in Raleigh, NC,  
for MCB Camp Lejeune, North Carolina

Dear Ms. Boucher:

The Environmental Protection Agency (EPA) appreciated the opportunity to meet with the Navy to review Draft EPA comments to the following documents.

Draft Remedial Investigation Report for Hadnot Point Industrial Area, Characterization Study to Determine Existence and Possible Migration of Specific Chemicals In Situ (Volumes 1, 2 and 3).

Hadnot Point Industrial Area, Baseline Risk Assessment Final Draft.

Draft Feasibility Study (Shallow Soils and Deep Aquifer) for Marine Corps Base Camp Lejeune.

Site Assessment Report for Sites 6, 48 and 69, Characterization Study to Determine Existence and Possible Migration of Specific Chemicals In Situ.

As a result of the meeting both EPA (draft comments) and North Carolina Department of Environment, Health, and Natural Resources (NCDEHNR) comments were further clarified. This should aid the Navy in understanding what is needed to gain Federal and State approval.

In addition to comments to the above referenced documents, discussions were held concerning the:

- 1) MCB Camp Lejeune Site Management Plan for FY 1992, including EPA comments.
- 2) Expedited schedules for work performed at each operable unit.
- 3) Parallel review of internal draft documents to expedite document deliverable.
- 4) Removal/Interim Remedial Actions at several sites.

This letter is to present EPA's understanding of what is to be expected from the Navy in regards to the issues discussed.

#### I. MCB Camp Lejeune Site Management Plan

##### OPERABLE UNITS

A. "Sites" at MCB Camp Lejeune should be assigned to operable units (OU). These OU's can be composed of one site or several sites. Boundaries for each operable unit should be clearly defined or described.

B. Realize that each operable unit will have RI/FS work performed to determine the magnitude and extent of contamination within the entire OU - to the extent necessary to select and design a remedy.

C. All work for each operable unit will proceed through Record of Decision (ROD) stage and if necessary continue through implementation of the final remedy if the Baseline Risk Assessment and ROD so warrant.

D. Any "Sites" to be excluded from within operable units should be clearly identified.

#### II. EXPEDITED SCHEDULES

A. Informal Expedited Schedules should be planned for each operable unit prior to the implementation of the RI/FS. The informal schedule is an attempt by the Navy and the other parties to work faster than the formal schedule presented in the Federal Facility Agreement (FFA). The purpose of the informal expedited schedule is to seek to achieve the most efficient management of work, hence cutting unnecessary time from the remedial process as provided for in the formal enforceable schedules in the FFA.

### III. PARALLEL REVIEWS OF INTERNAL DRAFT DOCUMENTS

A. As part of expediting the schedule EPA suggests "Parallel Review" of documents. For example, when the Navy contractor sends an internal draft document for the Navy's review/comment and concurrence, EPA would also receive a copy of the document to review and submit comments within specific timeframes set by the Navy. All EPA comments sent to the Navy on such internal draft documents would be informal and not be subject to Navy response to comments.

B. ~~I~~ Incorporation of EPA's comments would result in a better formal draft submission and quicker finalization of a draft final document. The EPA could also review the formal draft document at the same time as the Navy and eliminate the time needed for internal reviews prior to the Navy submitting a draft document.

C. All aspects of work performed, be it field work, document review timeframes, contractor time management, etc., should be evaluated to determine if they are the best possible, can be shortened, or overlap with other activities.

### IV. REMOVALS/INTERIM REMEDIAL ACTIONS

A. It was EPA's understanding that the following sites are going to be proposed for either Removals or Interim Remedial Actions for FY 1992:

- 1) Hadnot Point Industrial Area - Shallow Aquifer - IRA: remediation of shallow groundwater contamination found beneath this area.
- 2) DRMO Storage Lots (Site 6) 201 and 203 - removal of hazardous waste contained in drums found at these sites, with possible removal of any soils found to be contaminated as a result of being exposed to these drums.
- 3) Possibility for the removal of UST's at HPIA which contain(ed) hazardous waste. EPA requests the Navy provide a list stating which UST's are considered for removal (for the entire MCB Camp Lejeune Military Reservation) under existing North Carolina UST rules and regulations and which tanks will be removed under IRP/CERCLA.

EPA will work to provide the Navy with guidance to aid in the Navy's remedial activities for MCB Camp Lejeune, NC.

If you have any questions concerning these matters, please contact me at (404) 347-3016.

Sincerely yours,

*Carl R. Froede Jr.*

Carl R. Froede Jr.  
Remedial Project Manager  
DOD Remedial Unit  
RCRA and Federal Facilities Branch  
Waste Management Division

cc: Mr. Jack Butler, NCDEHNR  
Mr Brynn Ashton, MCB Camp Lejeune