

17 October 1991

**MCB CAMP LEJEUNE IR PROGRAM
SIGNIFICANT PAST/CURRENT PROBLEM AREAS
IN DEALING WITH EPA REGION IV**

Following is a listing of three key areas in which the Navy has had some difficulty in dealing with EPA Region IV during the last year (with respect to the IR program at MCB Camp Lejeune). It should be noted that the Navy continues to strive towards creating a positive open-line of communication with EPA Region IV and finds that the larger percentage of dealings with EPA Region IV can be characterized as positive and without major problems. However, for the purpose of briefing Code 18 and 182 on the less positive aspects of dealing with Region IV, the following is provided.

I. Last Spring the Navy verbally requested (phoncon with Carl Froede) a 71-day extension for submittal of the Draft RI/RA/FS reports (Hadnot Point shallow soils/deep aquifer). Carl Froede indicated this extension was acceptable. The Navy documented this agreement in a letter and forwarded this letter to EPA. Based on this agreement, the Navy proceeded to revise the Site Management Plan (SMP) to reflect this extension (the SMP was in process of yearly revision at that time) and to enter into contractual agreements impacted by this extension. Approximately one month later, without any "heads-up" the EPA notified the Navy in writing that the reasons stated in our follow-up letter were not sufficient, and the EPA would not grant the extension. The Navy forwarded the EPA another letter further documenting the need for an extension, which once again the EPA denied. To avoid dispute resolution, the Navy decided to send the reports by the original date.

Copies of the relevant letters are attached.

II. On October 8, 1991 we received a "Draft" copy of EPA's comments to the ESE RI/RA/FS Reports for the Hadnot Point Shallow Soils/Deep Aquifer. Included were 150 comments covering 23 pages. The Navy contends that approximately 20 percent of these comments should have been addressed during EPA review of the Workplan, since they dealt with the field approach (number of wells, types of analytical samples, etc.). Approximately 10 percent of the comments were repeats (i.e. stated in several different sections), and approximately 30-40 percent illustrated the reviewer's ignorance of past studies at Hadnot Point (this information was contained in these reports). It was clear that these comments had not been screened prior to being sent. A brief listing of the more important comments follows:

A. EPA recommends the Navy conduct a **basewide** Ecological Risk Assessment to assess the cumulative effects of risk posed at each site. While Micky Hartnett and Carl Froede of EPA indicate (verbally) they don't necessarily agree with this policy (impractical at this time), it is still included as a comment.

B. EPA states "EPA gives the Navy notice that a FS covering the shallow soils and deep aquifer is required at this time and a FS will be expected within 30 days of receipt of these comments." (Note that a FS for Hadnot Point was issued to EPA on August 23, 1991.) During the Navy/Marine Corp's October 16, 1991 meeting with EPA it became clear that this comment and a considerable number of the other comments were a result of the reviewer's ignorance of previous studies at Hadnot Point (record's search, soil gas survey, Verification Step, Characterization Study, etc.) which allowed the Navy to focus on key areas in the risk assessment versus all areas at Hadnot Point. Had the reviewer been provided this information (via a discussion with Carl Froede or review of RI report which was provided to EPA along with the FS), the above statement and approximately 30 to 40 percent of the comments could have been avoided.

C. The EPA includes a comment that "Additional wells at the site need to be installed in the surficial aquifer to define the contaminant plume." The objective of this investigation was to define deep aquifer and shallow soils contamination, not to address the shallow aquifer. (Groundwater wells in the surficial aquifer were sampled as part of this study to obtain current information only.) Therefore, the recommendation to install additional wells in the surficial aquifer is both a comment which comes over a year too late and which doesn't really apply to this study.

D. Several comments, again, indicate EPA contends additional wells should be installed in the surficial aquifer to further define the plume. These comments even recommend specific locations for these wells. However, these locations vary from comment to comment, creating inconsistency among the comments.

E. In EPA's letter, the same comments are repeated in different portions of the report by different reviewers.

F. EPA includes the comment "Groundwater in the surficial aquifer contains high concentrations of fuel-related contaminants and a layer of free floating product. The fuel tanks at this site and any additional sources should be removed or remediated. A pump and treat system is recommended for the surficial aquifer and should be initiated as soon as possible. EPA is well aware of the free product removal system currently near operation and also the interim remedial action in progress at HPIA. These two actions are identified (with dates) in the SMP.

G. EPA includes the comment "Reference is made to the shallow groundwater pump-and-treat alternative which was recommended as the most feasible remedial alternative, with the pumped groundwater disposal occurring in the Hadnot Point Sewage Treatment Plant. The question is when will the Navy propose this as an interim remedial action?" In July 1991 the Navy proposed to the EPA an interim remedial action for the surficial aquifer at Hadnot Point. This has been the subject of numerous discussions with EPA and is documented in the FY-91 and FY-92 SMP.

A copy of EPA's draft comments are attached. It should be noted that the Navy stressed to EPA at the October 16 meeting that the Navy contends it is not acceptable for EPA to send comments not screened. It appeared (but was not clearly confirmed) that the final letter would be screened, at least to some degree.

III. The EPA forwarded a letter containing comments to the MCB Camp Lejeune Community Relation's Plan **one year after close of the official review period**. MCB Camp Lejeune responded point by point to these comments.

A copy of EPA's letter and MCB Camp Lejeune's response is attached.

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