

09.01-09/17/91-00495

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17 SEP 1991

From: Commander, Atlantic Division, Naval Facilities
Engineering Command
To: Commanding General, Marine Corps Base, Camp Lejeune
(Attn: AC/S, EMD)
Subj: CANCELLATION OF TECHNICAL REVIEW COMMITTEE MEETING

1. In regard to the upcoming Technical Review Committee (TRC) meeting scheduled for 4 October 1991 to discuss the Draft RI/FS reports at Hadnot Point (shallow soils and deep aquifer), we recommend this meeting be postponed for the following reasons:

a. We will be receiving EPA/DEHNR's comments to these reports later than we had originally expected, and this greatly deteriorates our ability to prepare a negotiation position for the Remedial Project Manager (RPM) meeting scheduled for 3 October 1991, one day prior to the TRC. A successful RPM meeting is an important precursor to the TRC since, ideally, at this meeting we intend to resolve the more important issues so that when we present the reports and conclusions to the TRC, MCB Camp Lejeune and the regulators present a unified, rather than disjointed, position. We had anticipated receiving EPA comments to these reports the week of 23 September 1991; this would have allowed us approximately one week to review EPA/DEHNR's comments and prepare for the RPM meeting. Mr. Carl Froede of EPA Region IV has now indicated he will not have EPA comments to these reports until 2 October 1991, one day before the RPM meeting and two days before the TRC meeting. If we were to proceed as scheduled, MCB Camp Lejeune would essentially be at a disadvantage since we would not have adequate time to prepare for the RPM meeting and therefore the TRC meeting.

b. At this point in time, the data we have to present to the TRC is inconclusive since we are not convinced the contaminants of concern (PAHs) are in line with background levels or actually represent contamination resulting from disposal practices. Until we know what EPA/DEHNR's position is concerning these extremely low levels of PAHs (i.e. if these levels are within a range of an acceptable risk), we do not know what constitutes the appropriate next phase of the IR process. If EPA/DEHNR deems this an acceptable risk, then the next step is generation of a PRAP and ROD to document a "no action" decision. If EPA/DEHNR deems this an unacceptable risk, then further soil sampling is necessary to define background levels and volumes of contaminated soils, if

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these are considered contaminated. Since a TRC is held to solicit input from the local community, holding a TRC when we do not know which of these two alternatives we want to pursue would not be appropriate.

2. Because of these reasons, it is suggested that the TRC meeting be postponed until a later date at which point we have conclusive information to present. It is suggested that we conduct a RPM meeting the week of 7 October 1991 to discuss EPA/DEHNR's comments and negotiate the most appropriate next IR phase. As a first choice, this meeting would be held at MCB Camp Lejeune and as a second choice at EPA Region IV's office in Atlanta, Georgia, depending on EPA's ability to obtain travel funding this early in the fiscal year.

3. Our point of contact for information concerning the above is Ms. Laurie Boucher, P.E., at (804) 445-1814. Please inform her at your earliest convenience of MCB Camp Lejeune's ability to participate in an RPM meeting the week of 7 October 1991.

P. A. RAKOWSKI
By direction

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