

04.01-04/20/92-00725



DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
NORFOLK, VIRGINIA 23511-6287

TELEPHONE NO

(804) 445-2931

5090 IN REPLY REFER TO:
1823:BB:clt

20 APR 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

North Carolina Department of Environment,
Health, and Natural Resources
Post Office Box 27687
Attn: Mr. Jack Butler
401 Oberlin Road
Raleigh, North Carolina 27611

Re: MCB Camp Lejeune, Treatment of TCE Contaminated
Groundwater from the Hadnot Point Shallow Aquifer at the
Hadnot Point Wastewater Treatment Plant

Dear Mr. Butler:

During a meeting of Remedial Project Managers at MCB Camp Lejeune on 19 and 20 February 1992, we discussed the relevance of listed hazardous waste regulations (40 CFR 261) to our proposed remediation methodology for the Hadnot Point Shallow Aquifer at MCB Camp Lejeune, North Carolina. This methodology involves treating TCE contaminated groundwater in the existing Hadnot Point Wastewater Treatment Plant.

The Navy's position is that this TCE contaminated groundwater is not a listed hazardous waste. Thus, RCRA listed waste ARAR's will not apply to the treatment of the contaminated groundwater from CERCLA sites in MCB's Wastewater Treatment Plants. Further, listed hazardous waste regulations do not explicitly apply to the subject treatment.

During this meeting, the EPA Region IV Remedial Project Manager also provided the same interpretation that listed hazardous waste regulations would not apply to the treatment of TCE contaminated groundwater at the Hadnot Point Wastewater Plant.

As you are well aware, we are progressing toward a Record of Decision for the Interim Remedial Action for the Shallow Aquifer at the Hadnot Point Operable Unit with this understanding. As such, we request the NCDEHNR's written position on the above matter by April 24, 1992. If no reply is received by this date, we will assume your concurrence with our position regarding this matter and proceed accordingly.

Re: MCB Camp Lejeune, Treatment of TCE Contaminated Groundwater
from the Hadnot Point Shallow Aquifer at the Hadnot Point
Wastewater Treatment Plant

Please contact Mr. Byron Brant, Camp Lejeune Remedial Project
Manager, at (804) 445-2931 if you have any questions or comments
concerning this matter.

Sincerely,

P. A. RAKOWSKI, P.E.
Head,
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Copy to:
MCB Camp Lejeune, EMD, IR Program
Baker Environmental (Mr. Ray Wattras)
EPA Region IV (Ms. Michelle Glenn)

Blind copy to:

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MR JACK BUTLER
PO BOX 27687
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RALEIGH NC 27611

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