

06.01-06/30/94-01206



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IV

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

June 30, 1994

4WD-FFB

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Katherine Landman  
Department of the Navy - Atlantic Division  
Naval Facilities Engineering Command  
Code 1823  
Norfolk, Virginia 23511-6287

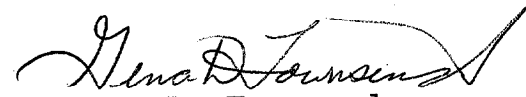
SUBJ: MCB Camp Lejeune  
Draft Interim Record of Decision  
Operable Unit No. 10 - Site 35

Dear Ms. Landman:

EPA has completed its review of the "Draft Interim Record of Decision for Operable Unit #10, Site 35, dated June 5, 1994. EPA does not agree with the selected course of action. A remedy must be evaluated and selected in the context of the Record of Decision. A more detailed discussion is included in the enclosed comments.

If you have any questions or comments, please call me at (404) 347-3016 or voice mail, (404) 347-3555, x-6459.

Sincerely,

  
Gena D. Townsend  
Senior Project Manager

Enclosure

cc: Patrick Waters, NCDEHNR  
Neal Paul, MCB Camp Lejeune

## Comments

1. Change the name of the document to "Interim Record of Decision, Contaminated Soil, Operable Unit 10....."
2. Page vi - "Statutory Determinations"  
This section should be re-titled and the context of this section changed. (see attachment "Exhibit 9-8").
2. A table should be included to identify the contaminants of concern and the detected concentrations relating to this Interim Action.
3. The ARAR discussion should only focus on the ARARs that pertain to the Interim Action and should be listed individually. (see the Revised Draft Final, Operable Unit 1, Record of Decision, dated 6/17/94).
4. The intent of the Record of Decision is to select a remedial action, and propose it to the public for comment. The selection of "three choices", that will be narrowed down during contract bidding, is not acceptable. An action should be selected with its appropriate cost at the writing of the Record of Decision.

9-13

## EXHIBIT 9-8

### Documenting Interim Action Decisions

#### OUTLINE FOR THE ROD

The guidance for preparing RODs in Chapter 6 should be followed for preparing a ROD documenting the selection of an interim action remedy, with the following modifications.

#### 1. The Declaration

- Site Name and Location
- Statement of Basis and Purpose
- Assessment of the Site
- Description of Selected Remedy
- ~~Statutory Determinations~~
- Declaration - The declaration statement should read as follows:

This interim action is protective of human health and the environment, complies with Federal and State applicable or relevant and appropriate requirements directly associated with this action, and is cost-effective. This action utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable, given the limited scope of the action. Because this action does not constitute the final remedy for the [site/operable unit], the statutory preference for remedies that employ treatment that reduces toxicity, mobility, or volume as a principal element [will not be satisfied by this interim action (or) will be addressed at the time of the final response action]. Subsequent actions are planned to address fully the principal threats posed by this [site/operable unit].

- Signature and Support Agency Acceptance of the Remedy

#### 2. Decision Summary

- Site Name, Location, and Description
- Site History and Enforcement Activities
- Highlights of Community Participation
- Scope and Role of Operable Unit - This section provides the rationale for taking the limited action. To the extent that information is available, the section should detail how the response action fits into the overall site strategy. The point should be made that the interim action will be consistent with any planned future actions, to the extent possible.
- Site Characteristics - This section should focus on the description of site characteristics to be addressed by the interim remedy.

**EXHIBIT 9-8 (continued)****Documenting Interim Action Decisions****OUTLINE FOR THE ROD****2. Decision Summary (continued)**

- **Summary of Site Risks - This section should focus on risks addressed by the interim action and should provide the rationale for the limited action. This could be supported by facts that indicate that action is necessary to stabilize the site, prevent further degradation, or achieve significant risk reduction quickly. Qualitative risk information may be presented if quantitative risk information is not yet available, which will often be the case.**
- **Description of Alternatives - This section should describe only the limited alternatives that were considered for the interim action. The ARARs discussion should be incorporated, as appropriate, given the limited nature of the action.**
- **Summary of Comparative Analysis of Alternatives - The comparative analysis should be presented in light of the limited scope of the action. Criteria not relevant to the evaluation of interim actions need not be addressed in detail. Rather, their irrelevance to the decision should be noted briefly.**
- **Statutory Determinations - The interim action should protect human health and the environment from the exposure pathway or threat it is addressing, any releases generated, or the waste material that is managed. The ARARs discussion should focus only on those ARARs specific to the interim action - those related to any final disposition of waste, off-site treatment or disposal, or releases caused during implementation. An interim remedy waiver may be necessary in some situations. However, if an interim waiver is needed, the final remedy must comply with the requirement. The discussion of the use of treatment should indicate that the selected remedy represents the best balance of tradeoffs with respect to pertinent criteria, given the limited scope of the action. The discussion under the preference for treatment section should note that the preference will be addressed in the final decision document for the site or operable unit.**
- **Explanation of Significant Changes**

**3. The Responsiveness Summary**