

11/01/90

TRIP REPORT
LANTDIV CODE 18, MCB CAMP LEJEUNE, EPA REGION IV

I. Meeting Objective: to discuss the Camp Lejeune Site Management Plan (SMP). A SMP is required, per the Camp Lejeune Federal Facilities Agreement (FFA), to be submitted within 30 days of the signing of the FFA. It is anticipated the FFA will be signed within the next 30 to 45 days.

II. Pre-EPA Meeting (19 Nov 90)

1. An afternoon meeting was held in Atlanta. Attendees were:

Andrew Kissell (Code 1822 Supervisor)
 Laurie Boucher (Code 1822 Camp Lejeune RPM)
 John Thompson (LANTDIV attorney)
 Stephanie Del Re Johnson (Camp Lejeune IR Manager)
 Captain Hinkle (Camp Lejeune attorney)

In the following discussion, persons shall be identified by their initials.

2. The objective of this meeting was to conduct preliminary discussions concerning site prioritization, probable format of the SMP, and to come to some consensus concerning the SMP prior to meeting with EPA.
3. SDRJ presented a draft proposed site prioritization. She indicated that ideally, if LANTDIV had the resources (DERA funds and RPM support), Camp Lejeune (CL) proposes five Remedial Investigation/Feasibility Studies (RI/FS) per year. Site inspections of several sites of which little is known would be in addition to this. SDRJ prioritized sites 6, 48, 69 and HPIA as the top priority sites.
4. SDRJ indicated she would review and possibly reprioritize sites after she knew EPA Region IV's criteria for prioritizing sites.
5. LB indicated that we intended to move into RI/FS phase for sites 48, 69, and 6 once ESE conducts field sampling, submits the field reports, and scopes and cost estimates can be developed. Since all three site reports are due 3rd quarter of FY-91, the timeframe for getting the RI/FS for these three sites negotiated will likely span from 4th quarter FY-91 to 1st quarter FY-92.
6. AK indicated that several evolutions would likely be occurring at one time, i.e. start-up of RI/FS at several sites, preliminary investigations at others, development of Proposed Remedial Action Plans (PRAPs) and Records of Decision (ROD), and remedial design and remediation efforts at others. Therefore,

although the availability of DERA funds did not appear to be a problem, people resources (RFMs to manage these projects) continues to be a limiting factor.

7. LB brought up the issue of Site Quarterly Progress Reports. Although unable to commit CL to this decision without the consent of her supervisor Julien Wooten, SDRD indicated CL would develop and submit these reports, as required by the FFA, to EPA. LANTDIV would provide CL with the consultant's monthly progress reports as input to these reports. The Memorandum of Understanding, which CH is currently developing, will document this decision.

8. The FFA requires notification of RPM alternates. Andrew Kissell is LANTDIV's alternate CL RPM. SDRJ agreed to submit this in writing to the EPA as required by the FFA. CL was unable to commit to their alternate at this meeting.

9. State ARAR issue was discussed. LANTDIV sent a letter to the state of North Carolina one year ago requesting clarification of State ARARs. State has not yet responded. SDRJ stated she would discuss this with Rich Carpenter (NOAH). LANTDIV will resend the letter if necessary.

10. Should Underground Storage Tanks (UST) be retained under the FFA or is the State the regulating authority? No decision was made. CL wants the UST sites in the FFA. LANTDIV will have to convince CL that removing them is in their best interests.

Statement is incorrect.

11. LANTDIV indicated 5 copies of draft Work Plans, Sampling Plans, etc. and 3 copies of draft final plans would be provided to EPA for review purposes. Draft, Final Draft, and Final documents will be sent directly from the LANTDIV consultant to the TRC members, as SDRJ requested.

12. We discussed proposed role of Vicki Bomberger (consultant presently working on several CL sites) at EPA meeting. VB was to arrive that evening. We requested she take meeting notes.

13. LB and AK discussed intent to task NUS to review CL and LANTDIV's recommended prioritization of sites, provide comments/recommendation, format and submit the actual SMP hard copy. CL will submit the SMP to EPA.

III. EPA Meeting (20 Nov 90)

1. In general, the meeting went quite well. EPA was congenial and expressed interest in an open, communicative working relationship with LANTDIV and CL. In fact, VB, who has been to numerous EPA meeting with Government Facilities and industrial clients, indicated this was the most congenial EPA meeting she had ever attended.

2. EPA provided copies of several actual SMP examples, guidance on developing FRAPs and RODs, and examples of Work Plan schedules.

3. EPA needs to know when the "primary" (major) documents will be submitted. The SMP schedule should be specific for the first fiscal year and generic for future years. Penalties could be imposed on CL if current year schedules are not met.

4. A discussion ensued concerning the difference between an Interim ROD and a Final ROD. An Interim ROD will be developed for each site/operable unit. The Final ROD, which is an accumulation of all Interim RODs, is appropriate when the entire Site (i.e. Camp Lejeune) is to be taken off the NPL list.

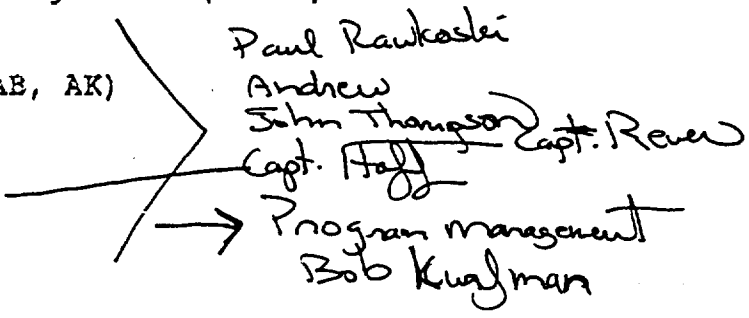
5. CL intends to study and remediate sites as quickly as possible within available resource constraints. EPA indicated their available manpower resources are limited as well.

6. Meeting notes [enclosure (1)] describe the meeting discussion in further detail.

Encl: (1) Meeting Notes (Draft)

Copy to:

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1822 (LAB, AK)
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MEETING NOTES
 NOVEMBER 20, 1990
 9:00-11:30
 USEPA REGION IV
 ATLANTA, GEORGIA

ATTENDEES

Jack Butler (JB)	Environmental Engineer North Carolina Superfund Section	(919) 733-2801
Andrew Kissall (AK)	Supervisor Environmental Engineer Atlantic Division Naval Facilities Engineering Command	(804) 445-2931
John Thompson (JT)	Assistant Counsel Atlantic Division Naval Facilities Engineering Command	(804) 444-9507
Laurie Soucher (LS)	RPM, Marine Corps Base Camp Lejuene Atlantic Division Naval Facilities Engineering Command	(804) 445-1814
Steve Hinkle (SH)	OSJA Marine Corps Base Camp Lejuene	(919) 451-2321
Stephany Del Re'- Johnson (SDJ)	IFM Marine Corps Base Camp Lejuene	(919) 451-5093
Vicki L. Bomberger (VB)	NUS Corporation Project Manager	(412) 788-1080
Wayne R. Mathis (WM)	Federal Hazmat Coordinator USEPA Region IV OPM-FAB-FFC	(404) 347-3776
Carl Froede Jr. (CF)	Marine Corps Base Camp Lejuene RPM Waste Division/RCRA/FFC USEPA Region IV	(404) 347-3016
Michael J. Hartnett (MH)	Chief DOD Remedial Unit Waste Division/RCRA/FFC USEPA Region IV	(404) 347-3016

MEETING OBSERVATIONS

(MH): The main topic today is the site management plan. EPA feels that with the size of the "base" and number of sites, a management plan is needed. Sites need prioritization. EPA intends to track on a yearly basis. (Navy can select start month.) The year time frame represents what EPA will track progress against. Activities beyond the impending year shall be shown briefly.

(SDJ): Will sites be referred to as Operable Units?

(MH): The grouping of sites and/or referencing of sites as operable units is up to LANTDIV/Lejuene, groupings can be based on media, location of sites, etc. Whatever makes sense relative to study and/or budget.

(AK): LANTDIV/Lejuene has discussed this concept also. We agree that prioritization is needed and intend to implement a plan accordingly. We would like to be able to show progress, including completion of some sites in a reasonable time frame.

(MH): EPA needs to know what you are doing, when, etc.

(WM): Keep in mind that once schedules are established you must keep to schedule or enforcement actions must kick in.

(MH): EPA needs to know when major or primary documents are due. Main goal is to get into "remediating" problems as opposed to producing RI's. We want to see ROD's implemented.

(AK): We intend to move ahead on a number of sites. AK described possible staging of activities.

(WM): LANTDIV may find that EPA may not be able to support all reviews etc. in as timely a manner as LANTDIV may need.

ROD'S

(MH): There are two types of ROD's (Interim & Final). Final ROD only occurs after all sites are resolved. All ROD's on a site by site basis until the final ROD are called Interim RODs. May even reassess interim RODs as new information (data) is available. Interim RODs are not cast in stone.

(WM): Does LANTDIV understand EPA's position on ROD's, in that we need public concurrence.

(SDJ): Why would we have an Interim ROD at discrete (stand alone) sites?

(MH): You can't do a final ROD until all sites are completed (per NPL). This NPL language may change. Can't do a delation until all sites are addressed and when the Final ROD is issued. (EPA recognizes need for removals under certain circumstances).

(LB): If a "proposed plan" is approved it becomes the ROD document also? I thought two documents were needed.

(MH): They are basically the same.

(SEJ): We would like to show (public) that sites are being "crossed off list".

(MH): The issue of Subpart K still needs to be resolved at HDQ's. Remember that regulations were set up for private sites as opposed to "bases" or federal facilities with multiple sites. (1-2 Operable Units vs. Multiple).

(AK): We still would like to show progress. The term "interim" is tentative.

(MH): Call it a "ROD". You just can't call it a "final ROD".

(SEJ): My concern is with public perception, that we want to show progress.

(MH): Don't need to call the ROD interim call it a ROD, but can't call it final ROD.

SCHEDULE

(CF): We have an example of a time line used at a Florida Site. This is what we would like to see from Navy. We also have a Pensacola example. This study has phasing of OU's (Operable Units). Calendar year is 89-90, then the last few years are shown briefly at end. Schedules in final years can't be firm at this point. Operable Unit groupings may change.

(MH): We want to see the schedule for primary documents.

(AK): I see fiscal years on this schedule.

(LB): Ours is set up on June to June basis.

(MR): Whatever you want, as long as its on a year to year basis.

(CF): I have another timeline example we would like to see in your work plan. This is important - we would like to see schedule so we can plan on going out and split samples with you, etc.

HADNOT POINT

(CF): Have you all received Hadnot Points Comments? (ESE Work Plan)

(LB): No, not yet.

(MH): We are starting to send out confirmation letters for primary documents.

A discussion of Hadnot Point Contamination (particularly groundwater) recovery of fuel product ensued. There was a communication error among parties. EPA/State thought at one point that only fuel would be cleaned up. It is Lejuene's intention to address entire site - fuel recovery is just first step.

SITE PRIORITIZATION

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(CF): In prioritization of sites - EPA would like to be part of review.

(MH): The Site Management Plan is a primary document.

(AK): Are you looking for backup/justification on prioritization.

(MH): We are looking for "rationale" more than justification.

(CF): This is important for public review.

(SDJ): Is the scope for Homestead (see attached reference material) what you want?

(CF): Look at our comments for that site (attached) - our theme is:

- Prioritized Units
- Shorten work time (want to see 18 months period)

(CF): We also have given you a ROD guidance package. It shows how to write a proposed plan.

We also have two samples of "real life" plans from Florida we have sent to you. There are two RODs generated for plans.

We sent 1) guidance document and 2) actual examples.

(CF): Also submitted are task breakout for plan.

Enclosure 3 is a primary document schedule which is what we would like to see (long term view).

Enclosure 4 is the generic primary and secondary documents description.

We also distributed July '89 Guidance on Preparing Superfund Documents: Interim Plan.

NAVY COMMENTS:

(AK): We have a few points we would like to address also. We have 5 sites we would like to start with. We are limited by staffing resources (besides money) as to how much we can "manage."

(MH): EPA is in same resource situation.

(AK): Situation in Iraq may also impact our ability to move forward "rapidly" at some point.

REGION IV DIRECTIVES

(MH): I want to address Enclosure 4 briefly. This is EPA Region IV guidance (Outline) not EPA HQ. This is what we need to see. This is our latest guidance (it may conflict with FFA terminology and we can upgrade FFA language). (This, revised guidance is tailored to what you are doing).

(CF): I will be out until December 14th. During interim please contact M. Harrett.

NAVY COMMENTS CONTINUED

(AK): We have several other issues we want to discuss.

Do you want to see data? i.e., all backup?

(CF): We don't need it, but it should be available.

(SDJ): Does 120 day schedule shown mean report delivery?

(CF): No--just data, there is a separate timeline for the RI Report.

(MH): EPA may want backup data for split samples if there is a conflict in results.

(AK): Are you going to consolidate EPA and State comments? Or will we get separate comments?

(MH): You will get comments from State and EPA separately, although we will coordinate comments. You may get conflicting comments, but we will try to avoid it.

(MH): We may have a time crunch and can't coordinate thoroughly with the state.

(SDJ): I have comment regarding community relations. Our community relations personnel have left for "Desert Shield". This will result in a change in the Community Relations Plan.

(MH): Just send us a letter with change noted.

(CF): Teamwork/coordination of this group (State/EPA/Navy) is very important.

(LB): When we send you draft reports - at end of 60 day review - we would like to have TRC so we can finalize documents.

(MH): We have RPM meetings and TRC meetings -- both with separate objectives.

RPM - FFA requires 3 parties (EPA must have meeting)
TRC - Keep public involved.

Generally we have RPM meeting first.

(CF): I think at the end of 60 days you would want to review our comments. Then 30 days later schedule TRC (unless there are problems with comments). Key is we would like to resolve all issues before having TRC so we can present a united and coordinated front.

(LB): You have 60 days for comments. We then have 60 days for revisions. We would like to insert TRC in this time frame.

(MH): TRC is required by Navy - it is up to you when you conduct it.

(AK): You would be receptive to schedule changes if we have major comments. Also if something comes up in TRC's.

(CF) and (MH): Yes

(WM): Again, we would like to present a unified front at a TRC.

(MH): We usually prefer RFA meetings prior to TRC to resolve issues. TRC is not in PFA, as it is a Navy requirement.

(LB): What about detailed scope of work.

(CF): Look at Homestead example, SMP is different than Work Plan.

Work Plan will have the detailed scope, not in SMP (Note: SMP is primary document).

The meeting concluded at 11:30.

ACTION ITEMS:

Navy is to prepare Site Management Plan.

Notes: Carl Froese will be out of the office through December 14th.
Michael Hartnett will handle questions.

VLS/sic

Attachments

(FINAL ONLY)

- Enclosure I through IV
- Additional Handouts