UNITED STATES MARINE CORPS MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA 28542-5001

IN REPLY REFER TO: 6286 BEMD JUL 24 1991

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From: Commanding General, Marine Corps Base, Camp Lejeune, North Carolina 28542-5001

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- To: Commander (Code 182), Atlantic Division, Naval Facilities Engineering Command, Norfolk, Virginia 23511
- Subj: EPA'S COMMENTS ON THE SITE MANAGEMENT PLAN (SMP) FOR MCB CAMP LEJEUNE

Ref: (a) 17 July 1991 FAX from Ms. Laurie Boucher, Lantdiv (Code 1822) Re: EPA's comments on the SMP

1. This memorandum is in response to the reference. This command is pleased that Region IV, United States Environmental Protection Agency, (EPA) is overall satisfied with the recently submitted draft of the SMP. In addition, the following comments are provided:

a. Major comments by EPA.

(1). Regarding EPA comment 1: this command concurs with EPA's recommendation to initiate the feasibility study after the first round of data. A second round of data is usually used to support a remedial action and/or verify first round data that is questionable. Usually, second round sampling is limited to only those portions of first round data found questionable vice all first round data.

(2). Regarding EPA comment 2: the Federal Facility Agreement (FFA), the first draft of the SMP and the Technical Review Committee (TRC) minutes support EPA's position on submittal of the RI/FS report for the soils and deep aquifer. EPA was led to believe that the ESE reports would be available for their review in August 1991. Discussions during the second and third TRC meetings held at MCB, Camp Lejeune, were specific on this point. We do not believe the EPA comments provided in the reference deny the request for an extension of submittal date for the RI/FS. Rather, EPA is emphasizing the importance of following FFA procedures for obtaining an extension. This command is opposed to entering into dispute resolution over this matter. In the event EPA does deny the extension, the preliminary documents should be provided to EPA and the State.

(3). Regarding EPA comment 3: this command concurs.

b. <u>Minor comments by EPA</u>. This command recommends revising Section 5.0 for FY '93 SMP to address these EPA comments. Subj: EPA'S COMMENTS ON THE SITE MANAGEMENT PLAN (SMP) FOR MCB CAMP LEJEUNE

121

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2. Major Navy and Marine Corps efforts have been expended to develop a SMP document satisfactory to all parties involved. At this point, the overall Installation Restoration Program objectives are better served by finalizing the SMP document as quickly as possible. Marine Corps Base, Camp Lejeune, point of contact with this matter is Stephany Del Re'-Johnson, Installation Restoration Program Manager, telephone extension (919) 451-5093 or Autovon 484-5093.

Danny D Sharpe

DANNY D. SHARPE Director, Hazardous Waste and Pollution Control Division By direction of the Commanding General

HQMC (Code LFL)