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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

FEB 03 1994

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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


RE: Marine Corps Base Camp Lejeune NPL Site
Draft Record of Decision
Operable Unit No. 5 - Site 2
Jacksonville, North Carolina

Dear Ms. Berry:

EPA has completed its review of the "Draft Record of Decision for Operable Unit #5, Site 2, dated December 28, 1993. EPA does not agree with the selected remedy. A more detailed discussion is included in the enclosed comments.

If you have any questions or comments, please call me at (404) 347-3016.

Sincerely,


Gena D. Townsend
Senior Project Manager

Enclosure

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

Comments

1. The selected remedy, RAA No. 2 - Limited Action, is not acceptable to the Agency. Land use restriction along with long term monitoring does not meet the goals and objectives of this program. This selection is neither a permanent solution nor is it protective of the environment.

The ROD states that an ARAR wavier is required because Federal and State groundwater standards will not be achieved upon implementing this remedy. The Comprehensive Environmental Response Compensation and Liability Act (CERCLA) identifies the circumstances in which a waiver can be invoked. They are:

- a. Interim Measures - the remedial action selected is only part of a total remedial action that will attain such level or standard of control when completed,
- b. Greater Risk to Health and the Environment - Compliance with such requirements at the facility will result in greater risk to human health and the environment than alternative options,
- c. Technical Impracticability - Compliance with such requirement is technically impracticable from an engineering perspective,
- d. Equivalent Standard of Performance - The remedial action selected will attain a standard of performance that is equivalent to that required under the otherwise applicable standard, requirement, criteria, or limitation, through use of another method or approach, and
- e. Inconsistent Application of State Requirements - With respect to a State standard, requirement, criteria, or limitation, the State has not consistently applied (or demonstrated the intention to consistently apply) the standard, requirement, criteria, or limitation in similar circumstances at other remedial actions.

In reviewing the above criteria and comparing it to the selected remedy, the request for a waiver is inappropriate for this site and another alternative should be selected.

2. A table should be included to identify the contaminants of concern and the detected concentrations. (An example from the "ABC One-Hour Cleaners" ROD has been attached.)
3. The site specific ARARS should be listed individually and not identified in a general paragraph. (see example from ABC Cleaners, attached)