

COMMENTS TO BE INCORPORATED IN
DRAFT SITE MANAGEMENT PLAN
DUE June 1, 1992

GENERAL COMMENTS

1. The individual sites must be reconfigured in order for them to be addressed in the RI/FS process. Currently, the document identifies a minimum of 18 different sites. If they are carried through the process as individual sites the following documents will be required on a site-specific basis: RI/FS Work Plan, Field Sampling and Analysis Plan, Quality Assurance Project Plan, Baseline Risk Assessment, Remedial Investigation Report, Feasibility Study Report, Proposed Plan and Record of Decision. Each site will require a separate and complete Administrative Record and will have to meet the statutory community relations requirements on a site-specific basis. This approach is not only unwieldy, it is extremely expensive and time-consuming. EPA is certainly willing to devote whatever time and resources are necessary to simplify the process by reducing the amount of "paper" that must be generated.
2. The work required to reach a final Record of Decision for the shallow aquifer at Operable Unit One must be scheduled in the Site Management Plan.
3. Due Dates of Draft Work Plans should be realistically scheduled. Scheduling them for the last day of the last quarter of the fiscal year does not provide much room for adjustment. This can have serious ramifications for both the Navy and EPA when making or meeting program commitments. At a minimum, the projects should be scheduled to allow the contractor to stay in the field uninterrupted, thereby avoiding the expense of continual mobilization and demobilization at Camp Lejeune.

SPECIFIC COMMENTS

1. Page 2-7, Footnote (1) - "Project start" should be defined as submission of draft project plans to EPA and the State.
2. Table 4-1, Page 4-3 - The Navy/Lejeune review time must be drastically reduced or eliminated as a separate item. An "integrated" review of the documents should be implemented. This would also eliminate the extra 75-90 days required for revision of the project plans prior to receiving comments from signatories to the Federal Facilities Agreement (FFA). The FFA is the driving force behind all schedules.
3. Page 4-2, RI/FS and RA - The 450 days proposed for the conduct of the RI/FS and the Baseline Risk Assessment is too long. This time must be reduced. I would offer specific suggestions, however, the presentation of the time required to conduct specific activities is confusing and I am unclear as to which activities will overlap and, ultimately, which activities have been projected to require too much time.

4. Page 4-3, Proposed Remedial Action Plan - The time projected to complete the proposed plan is too long. This document amounts to a fact sheet summarizing the FS and providing the recommended alternative. It should be prepared and submitted in thirty (30) days or less.
5. Page 4-3, Community Relations Activities - The public notice should appear in the newspaper a minimum of two weeks prior to the start of the public comment period. The public meeting should be held to open the public comment period. The comment period should extend to thirty days after the meeting. This minimizes the possibility that the public will feel "rushed" and request the automatic thirty day extension to the comment period.
6. Page 4-3, Record of Decision - Once again, the timeframes proposed are too long. All of the parties to the FFA should have come to agreement as to the remedy prior to making the proposed plan public. Most of the document can be prepared prior to conclusion of the comment period. After all, the Record of Decision should provide an objective, factual discussion and comparison of the nine evaluation criteria. Changes resulting from the public comment period can be addressed in the appropriate section of the Record of Decision.
7. Page 4-4, Remedial Design Report - What is envisioned by a "Draft Proposed Remedial Action Plan"? This terminology applies to the proposed plan prepared prior to the Record of Decision.
8. Page 4-5 and subsequent pages - Much more overlap of activities is necessary to reach acceptable schedules. The proposed plan should be prepared and submitted to the FFA parties at the same time the Draft Final FS is submitted. The draft Record of Decision should be submitted within three weeks of the finalization of the proposed plan. The Draft Final Record of Decision should be submitted no later than 30 days after the conclusion of the public comment period.
9. Page 4-9, Figure 4-5 - As demonstrated by this schedule the overall site schedule for MCB Camp Lejeune is unacceptable. This shows some sites not reaching a Record of Decision until FY 1999. This is too long. The schedules and workload will be greatly reduced when operable units are formed and prioritized.
10. Page 5-4, Operable Unit No. 1: Shallow Soils and Deep Aquifer - This must be revised to reflect the current schedule and the additional work required.
11. Page 5-5 - The deliverables for the Deep Aquifer include: 1) Supplemental RI/FS Work Plan; 2) Field Sampling and Analysis Plan; and, 3) Quality Assurance Project Plan. I suggest the additional work required for the shallow soils also be included in this work plan to minimize the number of documents produced.