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DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
1510 GILBERT ST
NORFOLK VA 23511-2699

TELEPHONE NO.

(804) 322-4818

IN REPLY REFER TO:
6280
81232:KHL:clm

DEC 06 1994

CERTIFIED MAIL RETURN RECEIPT REQUESTED

United States Environmental Protection Agency, Region IV
Attn: Ms. Gena Townsend
Waste Management Division
345 Courtland Street, N.E.
Atlanta, GA 30365

Re: MCB Camp Lejeune Remediation Investigation/
Feasibility Study Schedule Change Request
Camp Geiger Fuel Farm Operable Unit No 10 (Site 35)

Dear Ms. Townsend:

The purpose of this letter is to request your concurrence on proposed schedule changes for the Remedial Investigation and Feasibility Study (RI/FS) at Site 35, MCB Camp Lejeune. This request is made in accordance with Section XXIX of the Federal Facilities Agreement (FFA) of December 1989. In summary, we propose preparation of an Interim FS/PRAP/ROD to address groundwater contamination in the eastern part of the site, an additional study to investigate extent of groundwater contamination in the western portion of the site, and delay of submittal of the comprehensive FS/PRAP/ROD until results of the additional study can be incorporated. The rationale supporting this proposal is explained below.

This site is unique in several ways. Site terrain and other physical features effectively divide the site into two parts: (1) to the west, a relatively flat and well-developed upland area, and (2) to the east, a heavily-wooded and steeply sloped area that dips down to Brinson Creek. The eastern portion is the location of the Camp Geiger Fuel Farm and is also the proposed location for the construction of a 6-lane highway by the North Carolina Department of Transportation (NCDOT).

Field work recently completed in conjunction with the RI at Site 35 indicates that additional investigation is necessary to fully characterize the extent of the TCE plume in the groundwater in the western portion of the site. However, sampling results indicate that the extent of petroleum and TCE contamination in the groundwater on the eastern portion of the site is well-defined. Details of these sampling results are presented in the Draft Remedial Investigation (RI) Report for Site 35 (issued 31 October 1994).

The unique characteristics of the site, sampling results, and possible courses of action were discussed at our Partnering Meeting of November 8-9, 1994. The Navy/Marine Corps feels that the unique site characteristics indicate that separate remedies will likely be required for the eastern and western portions of the site. In addition, we do not want to delay implementing a remedial action in the eastern portion of the site while we continue to collect data from the western portion. As discussed, we propose the following changes to the 1995 Site Management Plan (FY95 SMP) in order to appropriately address contamination at this site:

1. Submission of RI Report

The Draft Remedial Investigation (RI) report has already been issued. Subsequent versions of this report will be submitted as previously scheduled in the FY95 SMP.

2. Submission of an Interim FS Report, PRAP, and ROD

An Interim Feasibility Study (FS) Report, Interim PRAP, and Interim ROD for contaminated groundwater in the eastern portion of the site (vicinity of the Fuel Farm) will be submitted according to the schedule presented in Attachment A. Note that this schedule closely mirrors the original FY95 SMP schedule for the full FS, with only minor changes to accommodate the shift to an Interim FS submittal.

3. Additional Investigation

Additional sampling will be performed to fully define extent of TCE contamination in groundwater on the western portion of the site. This sampling will be performed under the existing Project Plans as modified by letter to the State of North Carolina and EPA Region IV presenting rationale for proposed additional sampling. We expect this additional sampling to occur in the first quarter of 1995. A proposed schedule will be provided at a later date.

4. Addendum to RI Report

The results of the additional investigation will be presented in a separate document titled "Addendum to Remedial Investigation Report." A proposed schedule for submission of this report will be provided at a later date.

5. Submission of a Full FS Report, PRAP, and ROD

Following the Addendum to the RI Report, a full FS, PRAP, and ROD will be submitted to fully address the entire site, including specific remedial action plans for contaminated groundwater of the western portion of the site. A proposed schedule for submission will be provided at a later date.

The Navy/Marine Corps appreciates your continued involvement in this project and we hope that the these proposed changes are to your satisfaction. Please direct any questions or comments to Ms. Katherine Landman at (804) 322-4818.

Sincerely,



L. A. BOUCHER, P.E.
Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Attachment

Copy to:

NC DEHNR (Mr. Patrick Watters)

MCB Camp Lejeune (Mr. Neal Paul)

Baker Environmental, Inc. (Mr. Ray Wattras, Mr. Dan Bonk)

Activity Admin Record File ,

ATTACHMENT A

**Proposed Schedule for Interim FS/PRAP/ROD
Contaminated Groundwater at Camp Geiger Fuel Farm
Site 35, Operable Unit No. 10
MCB Camp Lejeune, NC**

	<u>Original FY95 SMP Full FS/PRAP/ROD¹</u>	<u>Proposed Interim Reports²</u>
FS/PRAP		
Draft FS/PRAP	28 Nov 94	09 Dec 94
Draft Final FS/PRAP	28 Mar 95	08 Apr 95
Final FS/PRAP	27 May 95	07 Jun 95
ROD		
Draft ROD	26 Jan 95	26 Jan 95
Draft Final ROD	26 May 95	26 May 95
Final ROD	09 Jul 95	09 Jul 95

Notes

1. Full FS/PRAP/ROD reports will not be submitted until completion of additional investigation of groundwater in the western portion of Site 35. A revised schedule for submission of these reports will be submitted under separate cover.
2. Interim FS/PRAP/ROD reports for the remediation of contaminated groundwater in the eastern portion of Site 35 will be submitted according to the original schedule set for the Full FS/PRAP/ROD reports with the exception of the Draft FS/PRAP as indicated.

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3. Article Addressed to:
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REGION IV
MS GENA TOWNSEND
345 COURTLAND ST NE
ATLANTA GA 30365

4a. Article Number
P 075 318 772

4b. Service Type

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7. Date of Delivery

5. Signature (Addressee)


8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

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