



DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
NORFOLK, VIRGINIA 23511-6287

08.01-03/20/92-00046

TELEPHONE NO

(804) 445-2931

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20 MAR 1992

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Waste Management Division
United States Environmental Protection Agency,
Region IV
Attn: Ms. Michelle Glenn
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: Extension of Submittal Date for Draft Final Interim
Remedial Action, Remedial Investigation, Feasibility
Study, and Proposed Plan for the Hadnot Point Industrial
Area Operable Unit

Dear Ms. Glenn:

We are writing this letter to provide written notice that, as per the Marine Corps Base Camp Lejeune Federal Facilities Agreement (Section X.G.6.), we are exercising our privilege to extend the sixty-day period for issuing the subject draft final primary documents by twenty days. Therefore, the submittal date for the subject documents is delayed from March 27 to April 16, 1992.

This twenty-day extension is required to adequately address your comments on the draft versions of the subject documents, provided in your letter dated January 27, 1992. In our letter dated February 11, 1992, we explained the subject documents (including the Focused Feasibility Study) were prepared based on guidance given previously by the EPA Region IV. The letter dated March 5, 1992, from EPA Region IV specified that the guidance given previously was not approved and did not apply to the subject site and situation, and reiterated that your comments of 27 January 1992, must be addressed. However, as we could not proceed with revising the subject documents until a number of significant issues were clarified at our meeting of February 19 and 20, 1992 and documented in the EPA Region IV letter dated March 5, 1992, additional time is required to address EPA Region IV comments. EPA Region IV comments require we substantially revise the subject documents, including the following:

- The FS will include and evaluate a significant number of new technologies and process options. Table 2-1 will be expanded. In addition to adding these new technologies and process options, this will have a "domino" effect, in that new alternatives will also be identified and evaluated.

03/20/92

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- The evaluation of alternatives against the nine evaluation criteria will be expanded in accordance with EPA guidance.
- The pre-treatment of the groundwater will be modified to address "new" contaminants of concern, such as chromium, lead, iron, and manganese.
- Recalculation of cost estimates for most of the alternatives based on changes to pre-treatment technologies or discharge options (we may have to discharge the treated groundwater to either the New River or the Hadnot Point Wastewater Treatment Plant, since we can not discharge to Codells Creek due to downstream wetlands).
- A considerable effort will be required to better assess the feasibility of using the existing sewage treatment plant (e.g. sewer line evaluation, capacity, potential air emissions, etc.).
- New figures will be prepared for the Interim Remedial Action RI since the existing figures were copied from ES&E's reports and are not of the highest quality (e.g., not to scale, illegible, too busy, etc.)
- The PRAP will be revised to reflect changes in the FS. The ROD will have to be prepared to reflect the selected alternative, which the Navy/Marine Corps assumes to be the use of the Hadnot Point Wastewater Treatment Plant (Alternative 2).

Any questions concerning this matter should be directed to Mr. Byron Brant at (804)-445-2931.

Sincerely,

P. A. RAKOWSKI, P.E.
Head
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

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NCDEHNR (Mr. Jack Butler)
MCB Camp Lejeune (Mr. George Radford)
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3: Article Addressed to: Waste Mgmt Division
 US Environmental Protection Agency
 Region IV
 Ms. Michelle Glenn
 345 Courtland St, NE
 Atlanta, GA 30365

4. Article Number
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