

04.01-04/06/92-00116



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

TELEPHONE NO

(804) 445-2931

5090^{IN REPLY REFER TO}
1823:BB:clt

06 APR 1992

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

United States Environmental Protection Agency
Region IV
Attn: Camp Lejeune Remedial
Project Manager (Ms. Michelle Glenn)
345 Courtland Street
Atlanta, Georgia 30365

Re: MCB Camp Lejeune, Treatment of TCE Contaminated
Groundwater from the Hadnot Point Shallow Aquifer at the
Hadnot Point Wastewater Treatment Plant

Dear Ms. Glenn:

This letter confirms our recent discussion concerning the relevance of listed hazardous waste regulations (40 CFR 261) to our proposed remediation methodology for the Hadnot Point Shallow Aquifer at MCB Camp Lejeune, North Carolina. This methodology involves treating TCE contaminated groundwater in the existing Hadnot Point Wastewater Treatment Plant.

The Navy's position is that this TCE contaminated groundwater is not a listed hazardous waste. Thus, RCRA listed waste ARAR's will not apply to the treatment of the contaminated groundwater from CERCLA sites in MCB's Wastewater Treatment Plants. Further, listed hazardous waste regulations do not explicitly apply to the subject treatment.

During a meeting of Remedial Project Managers at MCB Camp Lejeune on February 19 and 20, 1992, you also provided the same interpretation that listed hazardous waste regulations would not apply to the treatment of TCE contaminated groundwater at the Hadnot Point Wastewater Plant.

As you are well aware, we are progressing toward a Record of Decision for the Interim Remedial Action for the Shallow Aquifer at the Hadnot Point Operable Unit with this understanding. As such, we request your written confirmation of the above by April 17, 1992. If no reply is received by this date, we will assume your concurrence with our position regarding this matter and proceed accordingly.

Re: MCB Camp Lejeune, Treatment of TCE Contaminated Groundwater
from the Hadnot Point Shallow Aquifer at the Hadnot Point
Wastewater Treatment Plant

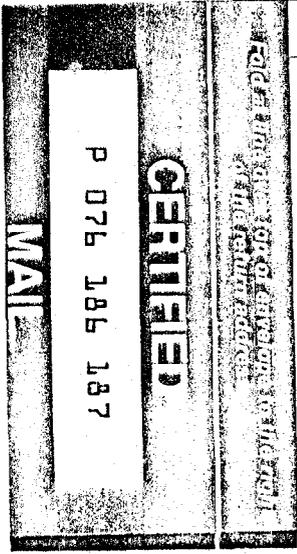
Please contact Mr. Byron Brant, Camp Lejeune Remedial Project
Manager, at (804) 445-2931 if you have any questions or comments
concerning this matter.

Sincerely,

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

Copy to:
MCB Camp Lejeune, EMD, IR Program
Baker Environmental (Mr. Ray Wattras)
NCDEHNR (Mr. Jack Butler)

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PS Form 3800, June 1985

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