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## DEPARTMENT OF THE NAVY

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ATLANTIC DIVISION NAVAL FACILITIES ENGINEERING COMMAND NORFOLK, VIRGINIA 23511-6287 TELEPHONE NO

(804) 445-2931

5090 IN REPLY REFER TO 1823:BCB:srw 2 0 MAR 1992

CERTIFIED MAIL RETURN RECEIPT REQUESTED

North Carolina Department of Environment, Health, and Natural Resources Post Office Box 27687 Attn: Mr. Jack Butler 401 Oberlin Road Raleigh, North Carolina 27611

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 Mr. Butler:

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 EPA Region IV comments on the draft versions of the subject documents, provided in their letter dated 27 January, 1992. In our letter to EPA Region IV 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 EPA comments of 27 January must be addressed. However, as we could not proceed with revising the subject documents until a number of significant issues were clarified at the RPM 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. 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

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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

Copy to: EPA Region IV (Ms. Michelle Glenn) MCB Camp Lejeune (Mr. George Radford) Blind copy to: 182, 1823 (BCB)(2 copies), 1812, 185 f:\admin\typeout\SA-EX}NC.BCB

SENDER: Complete items 1 and 2 and 4. Put your address in the REFURN PO sard from being returned to you. The delivered to and the date of delivery. F postmaster for fees and check box(es) for L. D. Show to whom delivered, date, an 1/Extra charge/f	"Bysce such an an return receipt fe or additional fees or additional servic d addressee's addr	versels $d = Faild$ be will provide the following e(s) requested. ess. 2. $\Box$ R $\uparrow (E$	ne to de the wi vou the name services are avai estricted Delive xtra charge) †	lli prevent this of the person liable. Consult	
3. Article Addressed to: NC DEPT OF ENVIRONMEN HEALTH AND NATURAL RESOURCES PO BOX 27687 MR. JACK BUTLER 401-OBERLIN RD RAFEIGH NC 27611		NF4. Article_Number P 982 093 094 Type of Service: Registered Insured Certified COD Express Mail:			
Signature - Addressee Hullis Jack Signature - Agent Date of Delivery 3 - 26-92		or egent and	In signature of <u>DATE DELIV</u> e's Address (OA i and fee paid)	<u>ERED</u> .	
Form 3811, Mar. 1987 <b>* U.S</b> BCB Code 1823 BCD Code 1823 BCB Com 3800, June 1985 Com 380, June 1985 Com 380, June 1985	RECEIPT FC NO INSURA NOT FOU (S Sent to NCDEHN Street and No. P.O. BO P.O. BO	2 093 ( DR CERTIFIE INCE COVERAGE PRO RINTERNATIONAL MU ee Reverse) X 27687 P Code r1in Rd.	Raleigh N s 2761		