



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

APR 11 1991

4WD-RCRA & FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1822
Ms. Laurie A. Boucher, P.E.
Remedial Project Manager for MCB Camp Lejeune
Norfolk, Virginia 23511-6287

RE: Review of the MCB Camp Lejeune Site Management Plan

Dear Ms. Boucher:

The U.S. Environmental Protection Agency (EPA) has completed the review of the following document dated March 1991:

Draft Site Management Plan for Marine Corps Base Camp
Lejeune, North Carolina

Several issues need to be addressed before final approval of the above referenced document can be given. EPA comments as relates to this document are enclosed.

EPA recommends that the three parties agree to a minor amendment to change the document titled "Site Scope of Work" to "Site Management Plan" in accordance with FFA Section XXXV., AMENDMENT OF AGREEMENT. The Site Management Plan document is not listed in the Federal Facility Agreement (FFA) as a primary or secondary document. The Site Scope of Work is the same document as the "Site Management Plan" and is a primary document in the FFA. EPA recommends this action to clarify the role of the Site Management Plan document and how it relates to the FFA.

The most significant changes needed are as follows:

- The SMP needs more aggressive schedules for RI/FS starts, proposed plans, records of decisions, and Interim RD/RAs beginning in 1991. The Region will provide all necessary assistance in initiating such activities as quickly as possible.
- Interim remedial actions needed for protection of human health or the environment should be identified and expedited in the schedule.
- Operable units should be developed, i.e., what site(s) or media will be addressed as an entity under the remedial investigation and remedial action.

- Prioritize operable units to assure progression to field mobilization on waste sites in FY 91, 92, & 93. Lower priority sites would overlap with remedial investigation and remedial actions starting later.

If you have any questions concerning these matters, please contact Mr. Carl R. Froede Jr., of my staff at (404) 347-3016.

Sincerely yours,


James H. Scarbrough, P.E., Chief
RCA and Federal Facilities Branch
Waste Management Division

Enclosure

cc: Mr. Jack Butler, NCDEHNR
Ms. Stephanie Del-Re Johnson, MCB Camp Lejeune
Ms. Nancy Stehle
Ms. Jacqueline Schafer

GENERAL COMMENTS

1) The Site Community Relations Plan (CRP), designated a primary document in the Federal Facility Agreement (FFA), is missing from the Site Management Plan (SMP). This document is required to be submitted very early in the remedial process to ensure public participation in remedial activities and selection of remedial action. The SMP should have a submittal date for the Draft CRP.

2) The SMP should outline all primary and relevant secondary documents to be generated and provided to EPA/State for review.

3) Site Investigation (SI) activities should be moved into a separate chapter/section of the SMP to prevent confusion on the public's part. While it is good to show that site investigative work is proceeding, the FFA deals only with sites in the Remedial Investigation/Feasibility Study (RI/FS) stage. Any sites that warrant further investigation after the SI is completed will be expected to be move into the FFA RI/FS stage of investigation.

4) Any specific actions that need to proceed in advance of the final remedy (to prevent the further migration/contamination and/or be protective of human health and environment) can be processed in an expedited manner as an Interim Remedial Action and EPA Region IV will provide guidance and assistance in the development of the appropriate CERCLA documents to obtain an expedited Record of Decision (ROD).

5) Refine and define the prioritization criteria used in assigning the order of remedial activity to be performed at MCB Camp Lejeune and MCAS New River RI/FS sites. Some catagories appear to be redundant or vague.

6) A general statement needs to be added on what the annual revision process will be and its implementation.

7) Operable Units (OU) should be developed for MCB Camp Lejeune and MCAS New River. Site numbers could still be used when referencing OUs.

8) Consider adding a section for acronyms and definitions of terms to ensure public understanding of the SMP.

SPECIFIC COMMENTS

1) Section 1.0, 4th paragraph, page 1-1: Delete the narrative and simply write the number of sites which are currently addressed under the FFA at present. A statement could be added stating that the existing list was based upon the results of a previous investigation and as sites warrant further investigation after the SI they will be added to the RI/FS list.

2) Section 2.0, Second Paragraph, Criteria bullets, page 2-1: Better descriptions are required for this list of criteria. It is not clear exactly what each item means nor is it clear how they affect the prioritization process. Please keep in mind that the Navy is also writing these documents for public review. The clearer the documents the better the public can understand the remedial activity.

3) Section 2.0, Site Listing, pages 2-1, 2-12 thru 2-22: All SI sites should be removed from this section. The FFA only relates to sites undergoing an RI/FS. It is therefore not necessary to show any SI work in this SMP. A separate section/chapter could be created to show these SI sites, if the Navy wishes to include them.

4) Table 2-1, page 2-2 thru 2-4: All SI sites should be removed from this table. A separate table could be created to show SI sites, however, it should be limited to the section/chapter on SI activity.

5) Table 2-2, page 2-5, 2-6: All SI sites should be removed from this chart. A separate chart could be created to show SI work, however, it should be limited to the section/chapter on SI activity.

6) Table 2-3, page 2-7: All SI sites should be removed from this table. A separate table could be created to show SI work, however, it should be limited to the section/chapter on SI activity.

7) Section 3.0, pages 3-1, 3-2: All SI site work referenced in this section should be removed and moved to the section/chapter on SI activity.

8) Section 3.0, pages 3-1, 3-2: Operable units should be proposed in this section to set the stage for future remedial activity. An operable unit can encompass several sites (i.e., Hadnot Point Shallow Ground Water Operable Unit would contain several sites). This will not divert attention from possible source areas, but rather create operable units (i.e., air, soil, ground water, etc.) which are impacted by the site, and which will require specific remedial actions and schedules.

9) Table 4-1, page 4-2 and 4-3: EPA cannot concur with the length of the RI/FS to Record of Decision (ROD) timeframe (45 months is too long!). We realize that this timeframe is generic in nature and certain timeframes are dictated by the FFA, however, some amount of time should/could be cut from this process (i.e., does it really take 360 days to conduct the RI and Risk Assessment?). The Region will continue to work with the Navy to refine these planning schedules.

10) Site Inspections Chart, Figure 4-1, page 4-5: This chart should be moved to the section/chapter on Site Investigations.

11) Site Management Schedule, Sites 6, 48, 69, Figure 4-2, page 4-7: These sites have undergone several rounds of remedial investigation. EPA does not believe that 360 days will be required to perform the RI and Baseline Risk Assessment. This timeframe is not acceptable as presented and timeframes for work at these sites need to be re-evaluated.

12) Site Management Schedule, Hadnot Point Shallow/Deep Aquifers, Figure 4-3, page 4-9: This schedule should be re-evaluated with considerations given to operable units as previously discussed.

13) Site Management Schedule, Figure 4-4, page 4-11: The timeframes projected in this chart should be re-evaluated. Some time could possibly be cut from these projects.

14) Site Management Schedule, Figure 4-5, page 4-13: Move all references to free product removal (sites 22 and 35) to a separate section/chapter of the SMP. A statement should be included as to the involvement of the North Carolina UST section at these sites.

15) Section 5.0, Scope of Work Summaries, page 5-1 thru 5-35: Only RI/FS sites covered under or added to the FFA are to be in this section. Delete all references to SI work from this section. The SI material could be moved to the section/chapter relating to SIs. Also references to free product removal (sites 22 and 35) at underground storage tank (UST) sites could be moved into a section/chapter relating to UST free product removal.

16) Section 5.0, Scope of Work Summaries, page 5-1 thru 5-35: Explain what "Scheduled Start", and "Scheduled Complete" mean in terms of site remediation. If there are not deliverables scheduled in 1991 do not only show "None", but rather show next planned deliverable.

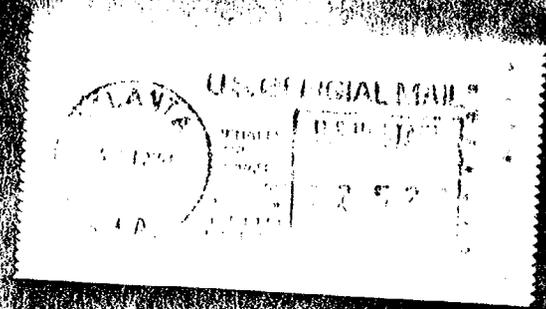
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Doc. No: CES-00120-3.01-4/11/91