

07.01-07/16/91-00317



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IV

JUL 16 1991

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

4WD-RCRA & FFB

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

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

RE: Draft Final Site Management Plan  
MCB Camp Lejeune, North Carolina

Dear Ms. Boucher:

Enclosed are the Environmental Protection Agency (EPA) comments addressing the Draft Final Site Management Plan (SMP) received in our office July 2, 1991. This SMP will establish the Fiscal Year 1991 primary and secondary document due dates.

Overall, EPA is pleased with this draft final document and looks forward to finalizing it and moving on with remedial activities. The enclosed comments must be addressed prior to the SMP becoming final on July 31, 1991. Failure to adequately address these comments may lead to EPA initiating dispute resolution pursuant to the Federal Facility Agreement.

If you have any questions concerning this matter, please contact me at (404) 347-3016.

Sincerely yours,

*Carl R. Froede Jr.*

Carl R. Froede Jr.  
Remedial Project Manager  
DOD Remedial Unit  
RCRA and Federal Facilities Branch  
Waste Management Division

Enclosure

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

EPA Comments to Draft Final Site Management Plan

MAJOR: (potentially subject to dispute resolution)

1) Section 4.0, Table 4-1, page 4-2: EPA recommends that the Navy start the feasibility study (FS) after the first round of sampling. Data results from the first round should generate information from which certain technologies for remediation can be considered. If a second round of sampling is necessary, additional data/information can be obtained to facilitate the remedy and selection process.

2) The request for an extension for the RI/FS Report for the soils and deep aquifer was received in our office June 18, 1991. The official notification is the receipt in writing of the request for an extension. As per Federal Facility Agreement Section XV. NOTIFICATION:

Part A. Unless otherwise specified, the following shall be sent by a registered/return-receipt mail, facsimile machine or hand delivery to Project Managers or their designated agent(s):

5. Any request, and response thereto, for extensions under Section XXIX (Extensions) of this Agreement.

The extension for the RI/FS Report for Hadnot Point soils and deep aquifer due August 23, 1991, has not been approved and the SMP addressing the report submission date should not have been changed until official acceptance from EPA and State of North Carolina DEHNR was received in writing.

The references to the RI/FS Report (November 1, 1991) due date for Hadnot Point Soils and Deep Aquifer should be changed to reflect the original August 23, 1991, due date. The SMP cannot be accepted until this change is made. Any extensions granted by EPA and the State will be reflected in separate correspondence and the impacts on following activities determined at that time.

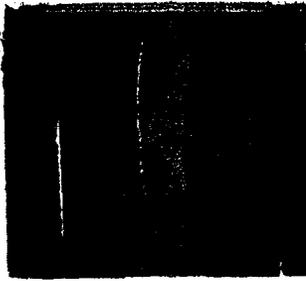
3) Section 5.0, Site Numbers 16 (pg. 5-6) and 28 (pg. 5-10): The "Deliverables" date shown does not correspond with either Figure 4-4 (deliverables chart) in Section 4.0, pg. 4-8, or the Scheduled Start date.

MINOR: (will not be subject of dispute resolution)

1) Section 5.0, page 5-2 through 5-19: Although all information presented in this section is both applicable and appropriate, EPA recommends that the sites be listed by their "Deliverables" and not by site number. That way the "Scope of Work Summaries" for each site will move through consecutive years the same way that Section 4.0 is presented.

07/16/91

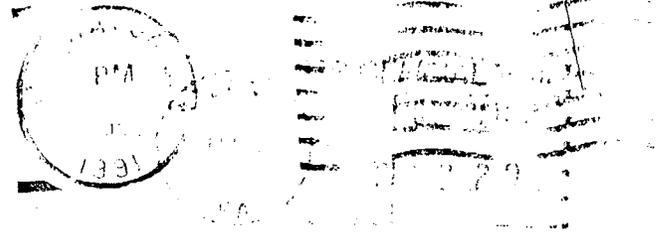
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*Linda Buckner*

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

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of the return address*

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