



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

NOV 29 1990

4WD-RCRA & FF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Brigadier General Michael P. Downs
Commanding General
Building 1
Marine Corps Base
Camp Lejeune, North Carolina 28540

RE: Review of Remedial Investigation/Feasibility Study
Documents

Dear General Downs:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the following documents on remedial activities at MCB Camp Lejeune, all dated September 1990:

- 1) Site Summary Report
- 2) Draft Final Work Plan for RI/FS at HPIA and Limited Scope Investigations at Sites 6, 48, 69
- 3) Draft Final Sampling Plan for RI/FS at HPIA and Limited Scope Investigations at Sites 6, 48, 69
- 4) Draft Final Health and Safety Plan for RI/FS at HPIA and Limited Scope Investigations at Sites 6, 48, 69
- 5) Draft Camp Lejeune Community Relations Plan for RI/FS at HPIA and Limited Scope Investigations at Sites 6, 48, 69

Several issues still need to be addressed before final approval of the above referenced documents can be given. Our comments are as follows for the sites designated in the titles:

- 1) The Site Summary Report may be used as supporting information for remedial investigations for sites listed in Appendix C of the Federal Facility Agreement (FFA). Site 68 - Rifle Range Dump Site will require further investigation (RI) to confirm or deny the presence of contaminants. Due to the type of materials reportedly disposed of at Site 68 and groundwater contamination associated within the general area, the EPA will require an additional monitoring well to be constructed and sampled as per previously used Draft Final Site Summary Report "Appendix A" constituents. The monitor well should be located hydrologically downgradient and in line with any probable contaminant plume which could be drifting from the primary dump area towards Stone Creek.

2) The Draft Final Work Plan has been tentatively approved to allow remedial activity to begin. However, the deficiencies in this document must be addressed before it can be accepted as Final under the terms of the FFA. If it is resubmitted after the effective date of the FFA it can be considered a "Final Draft" primary document per terms of the FFA and must meet applicable deadlines.

The Project Schedule within the Work Plan (page 71) should show report submittals (Primary and Secondary documents) in terms of Navy to EPA, with review periods (from the Federal Facility Agreement) taken into account. In addition, a projected schedule (preferably in timeline form) needs to be provided to address all remedial activity to be performed at the facility. The Operable Units should be prioritized within the work plan project schedule to allow for funding and scheduling of remedial activities. The project schedule also needs to include a Draft Proposed Plan Report submitted concurrently with the Draft Final FS Report, which addresses the recommended remedial action for each operable unit.

3) The Draft Final Sampling Plan is approved as submitted.

4) The Draft Final Health and Safety Plan is approved as submitted.

5) The Draft Final Community Relations Plan is approved as submitted.

Enclosed are two sets of examples for Proposed Plan and Record of Decision documents. The first document (Proposed Plan) was released for public comment. The Record of Decision document was then written with comments addressed as appropriate. These documents should provide guidance as MCB Camp Lejeune prepares to move forward on several operable units.

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

Sincerely yours,


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

Enclosures

cc: Ms. Lee Crosby, NCDEHNR
Mr. Jack Butler, NCDEHNR (with enclosures)
Ms. Laurie Boucher, NAVFAC (with enclosures)
Mr. Andrew Kissell, NAVFAC
Commander, NAVFAC
Ms. Stephanie Del-Re, MCB Camp Lejeune (with enclosures)
Mr. Julian Wooten, MCB Camp Lejeune