

07.01-08/23/91-00328



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

AUG 28 1991

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 Site Management Plan for FY 1992
MCB Camp Lejeune, North Carolina

Dear Ms. Boucher:

Enclosed are Environmental Protection Agency (EPA) comments specifically regarding the Draft Site Management Plan (SMP) for Fiscal Year 1992. These were inadvertently omitted from our previous letter of August 6, 1991. In accordance with the Federal Facility Agreement (FFA), the Draft Final SMP must be submitted within 60 days of receipt of comments. Please advise us if you will be able to maintain the original schedule.

GENERAL COMMENTS

- 1) All references to updating the SMP for each fiscal year in November, need to be changed to reflect the original June 1 date as originally agreed to in the Federal Facility Agreement (FFA).
- 2) The SMP is to reflect a five year overview of remedial activities at the facility, with the current fiscal year (FY) presented in greater detail than the future years. This idea is presented in graphic (timeline) form, but not reflected in the individual site plans. More details need to be added beneath the "Target Dates" heading to present what is anticipated at that specific site/operable unit.
- 3) All removal and/or interim remedial activities which Marine Corps Base Camp Lejeune will be initiating or proposing should be shown within that sites section of the SMP. Anticipated dates for removals and/or interim remedial actions should also be included.

SPECIFIC COMMENTS

1) Page 5-2, Site 78, Hadnot Point Industrial Area: The layout presented on this page is confusing. If multiple operable units (HP-Shallow Aquifer, HP-Deep Aquifer, HP-Soils, etc.) are proposed for this site then a clearer display for each one of these units needs to be presented. Each operable unit should have dates (for primary and secondary documents) projected through the five years that this SMP is to reflect. Shallow Aquifer - The dates for the submittals of the "Draft ROD" and "Final RI/FS Report and PRAP" need to be reversed.

2) Page 5-3, Site 6, DRMO Storage Lots 201 & 203: The dates presented for the RI/FS Workplan submittal are listed under the "Target Date" column, but should be listed under the "Compliance Date" column. Once again greater detail should be presented if any removal and/or interim remedial action, future site activities, etc., are planned for this site.

EPA recommends that a removal be conducted on the "DDT Drums" followed by an interim remedial action on the "Site 6 Ditch" and a final ROD/Remedial Action for any related soil or groundwater contamination.

3) Page 5-4, Site 48, MCAS New River Mercury Dump Site: Same comment as No. 2.

4) Page 5-5, Site 69, Rifle Range Chemical Dump: Same comment as No. 2.

5) Page 5-6, Site 9, Fire Fighting Area at Piney Green Road: Same comment as No. 2.

6) Page 5-7, Site 21, Transformer Storage Lot 140: Same comment as No. 2.

7) Page 5-8, Site 22, Industrial Area Tank Farm: Same comment as No. 2.

8) Page 5-9, Site 24, Industrial Area Fly Ash Dump: Same comment as No. 2.

As we have previously discussed, EPA is requesting that the Navy provide EPA and the State with a copy of the preliminary draft final SMP submitted to the Navy by the contractor for unofficial concurrent review prior to submission of the official draft final SMP.

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

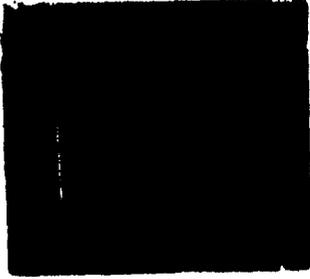
Sincerely yours,

Carl R. Froede Jr.

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

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

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Naval Facilities Engineering Command
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ATTN: Ms. Laurie A. Boucher, P.E.
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Norfolk, Virginia 23511-6287

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DATE *8/23/91*



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