



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

MAR 7 1986

4PM-EA/JLH

Commanding Officer
Department of the Navy
Southern Division
Naval Facilities Engineering Command
P.O. Box 10068
Charleston, South Carolina 29411

Attention: Mr. D.R. Spell, Head
Environmental Branch

Dear Sir:

In the recent past during informal contact with your staff, we have suggested that your agency (including the facilities you represent) and the Environmental Protection Agency (EPA), Region IV might benefit from more direct contact and closer coordination in carrying out your Naval Assessment and Control of Installation Pollutants (NACIP) Program. To date, we have participated by providing written comments on Phase I and in some cases, Phase II of the program at various facilities.

The need for careful coordination including the timely exchange of information on the regulation of inactive hazardous waste sites has been re-enforced by enactment of amendments to the Resource Conservation and Recovery Act (RCRA), (Note: these amendments have been titled the Hazardous and Solid Waste Amendments of 1984 (HSWA). We believe that provisions of the Act (Section 3004(U) will impact on-going programs by expanding or modifying objectives or requirements deriving from the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the National Contingency Plan. Specific areas in which this impact will be felt most heavily are groundwater monitoring at individual sites and development and implementation of appropriate remedial action plans that will require RCRA approval through a system of permitting. While the details on the extent to which Section 3004(U) are applicable at Federal Facilities have not been provided, we have been assured that they will be provided soon. Because of our belief that a better developed protocol will offer benefits to all we would like to propose a meeting with you and appropriate members of your staff to discuss this in depth.

We would suggest a meeting at your offices in Charleston on or about March 27, 1986, if this is acceptable to you. If practicable, representatives of the Norfolk Office might find it desirable to participate.

Sincerely yours,



Arthur G. Linton, P.E.
Regional Federal Facilities Coordinator
Environmental Assessment Branch
Office of Policy and Management

cc: J. Bailey
Atlantic Division
Norfolk, VA