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UNITED STATES MARINE CORPS
MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA 28542-5001

IN REPLY REFER TO:
6280
BEMD
13 MAY 1991

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commander, Atlantic Division, Naval Facilities
Engineering Command

Subj: REVIEW OF DRAFT LANTDIV (CODE 1822) LETTER TO NUS CORP
REGARDING MCB, CAMP LEJEUNE SITE MANAGEMENT PLAN (SMP)

Ref: (a) Mtg btwn Representative of Region IV, USEPA; NC
DEHNR; LANTDIV (Code 1822); NUS CORP and MCBCL on
16 Apr 91

1. The subject letter was "FAXED" to this command on 8 May 91 for review and comment not later than 9 May 91. A draft response was "FAXED" to your office on 9 May 91. We have no specific comments regarding proposed changes to the SMP contained in the subject proposed letter. However, the changes to the Site Management Plan (SMP) described in the subject letter do not adequately address the following concerns stressed by representatives of the United States Environmental Protection Agency, Region IV (USEPA) during the reference:

a. The SMP should identify more interim remedial actions and/or removal actions, particularly relative to Sites 6 and 69.

b. The generic time line contained in the SMP is too long and is in direct conflict with congressional demand for more timely clean up/remediation of contaminated sites.

2. Regarding paragraph 1a above, this command believes there is a potential threat to Camp Lejeune's drinking water supply by contamination at Site 6 and other sites. Rapid residential development and existing new Onslow County elementary school in the near vicinity of Site 69 supports expediting source removal. The SMP should provide for a geophysical survey of site 69 as soon as possible with the intent to perform appropriate interim remedial action at the site.

3. Regarding paragraph 1b above, this command also desires more aggressive schedules within the SMP for RI/FS starts, proposed plans, records of decision, and interim RD/RAs. With the favorable "Force Majeure and Extensions" provisions of the Federal Facilities Agreement (FFA), this command must question a generic time frame requiring 45 months to conduct a RI/FS.

4. Your representatives have taken a firm position during the reference and subsequent conversations with this command that limited personnel resources and contracting constraints preclude any compromise on these two issues. Based on the reference,

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this command fully expects USEPA to initiate the FFA Section XI, Resolution of Dispute, relative to one or both of the issues addressed in paragraphs 1a and 1b above.

5. Should dispute resolution occur, the Navy and Marine Corps must have a mutual understanding of the issues involved. Therefore, it is requested LANTDIV provide a position paper on the feasibility of modifying the SMP to reduce the 45 months required to perform a RI/FS and to initiate interim remedial/removal actions. It is requested that the position paper identify possible solutions to the manpower and contracting constraints which preclude a positive response to the USEPA position.

6. Point of contact for this department is Mr. Danny Sharpe, Director, Hazardous Waste and Pollution Control Division, Environmental Management at Autovon 484-5093 or commercial (919) 451-5093.



J. I. WOOTEN
By direction

Copy to:
CMC (Code LFL)