



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

FEB 25 1992

4WD-RCRA/FF

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Laurie A. Boucher, P.E.  
Remedial Project Manager  
Department of the Navy - Atlantic Division  
Naval Facilities Engineering Command  
Code 1822  
Norfolk, Virginia 23511-6287

RE: Marine Corps Base Camp Lejeune NPL Site  
Jacksonville, North Carolina

Dear Ms. Boucher:

Please find enclosed a copy of the action items discussed and agreed to in the meetings held at the subject site February 18-20, 1992. I have not yet received attendance sheets listing the participants, but I suggest they be attached as an addendum to this letter, when they become available.

If you have any questions or comments concerning the items listed in the enclosure, please call me at (404) 347-3016.

Sincerely,

A handwritten signature in cursive script that reads "Michelle M. Glenn".

Michelle M. Glenn  
Senior Project Manager

Enclosure

cc: Jack Butler, NCDEHNR  
George Radford, MCB Camp Lejeune

## TRIP REPORT

Ms. Michelle M. Glenn, RPM, and Mr. Glenn Adams, Risk Assessment Specialist, attended an RPM and TRC Meeting on 2/19 and 2/20/92. In addition, a site visit was conducted.

The following action items and decisions were identified during the course of the RPM meeting.

- 1) The response to the Navy's letter dated 11 Feb 1992 requires clarification. EPA will provide a letter clarifying our position ASAP.
- 2) The Draft Final RI/BRA for the shallow soils/deep aquifer will be considered interim documents. The Navy will provide a written response detailing how the comments submitted by reviewers will be addressed or dispensed with.
- 3) The work plan for the deep aquifer and other outstanding issues at Hadnot Point Industrial Area will be submitted with the rest of the Hadnot Point Industrial Area Work Plans (Sites 21 and 24) due late September 1992. This approach envisions an RI/FS (BRA included) being submitted for the entire HPIA at the conclusion of this work. The ROD will include the final remedy for the shallow aquifer as well.
- 4) The Navy will undertake removal of the closed out underground tank in the vicinity of buildings 901/902. This removal will be proposed in a letter detailing the confirmatory sampling to be conducted after the tank is removed. The area of the tank is not currently identified as a source area.
- 5) Site 9, while in the vicinity of HPIA is not contributing to the identified contamination plume and therefore will be considered separately. The assumption that the source is not contributing to the HPIA groundwater plume will be confirmed prior to finalization of this decision. It is anticipated that work on this site will not occur this fiscal year.
- 6) MCB will prepare a letter for LantDiv requesting clarification of potential RCRA ramifications of processing the contaminated groundwater through the existing wastewater treatment plant.
- 7) LantDiv will send a letter requesting Site 22 be turned over to the UST program at the State of North Carolina in light of the fact that all previous sampling in the area has indicated the fuel tank farm is the only source of contamination in that area. These were tanks of jet fuel and are exempt from CERCLA under the petroleum exclusion.

- 8) The Navy has questions concerning EPA's strong recommendation that an Administrative Record should be prepared to support each ROD. Currently, one AR for the entire facility is envisioned. The potential problems associated with this approach were discussed. EPA committed to investigate current practices in Region IV and the Navy was directed to consult with their legal department to get an opinion on the matter.

The Navy also has a question as to when in the RI/FS process the AR is required. EPA and the State will be informed of the results of the Navy's internal discussions.

- 9) Previously, operable units were thought to be appropriate only in those instances where a groundwater problem common to two or more areas was identified. EPA clarified that an operable unit may also be appropriate where sites are physically separate, but a common remedy may be feasible. This would reduce the number of RODs and associated supporting documents that may be necessary overall at MCB.
- 10) Operable Unit one is now redefined to include all the identified sites at HPIA (with the exception of Sites 22, 28 and 9).
- 11) It was agreed that the FFA may require modification to clarify the deliverables deemed to be necessary and "primary". EPA, the State, and Lantdiv/MCB Camp Lejeune will schedule a conference call to discuss potential changes.
- 12) EPA told the Navy that a revised expedited schedule will not be necessary at this time. Work for the remainder of FY92 has been decided. In addition, consideration of EPA suggestions for reducing the time in the SMP may result in acceptable schedules. The issue of expedited schedules will be revisited after submission of the June 1992 SMP.
- 13) A letter will be submitted to EPA in the near future indicating MCB Camp Lejeune's position on EPA's Data Locational Policy.
- 14) The "phased" approach to the RI/FS presented in the project plans for Sites 6, 48, and 69 is being reconsidered by the Navy/MCB Camp Lejeune. It was agreed that Site 69 requires a phased approach due to the unique nature of the waste at the site.

