

07.01-10/19/92-01145

(804) 445-2931

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1823:BCB:srw

**OCT 19 1992**

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Peter Burger  
North Carolina Department of Environment,  
Health, and Natural Resources  
Post Office Box 27687  
401 Oberlin Road  
Raleigh, North Carolina 27611

Re: MCB Camp Lejeune; Extension of the Site Management  
Schedule for Site 69 (Operable Unit #4), Rifle Range  
Chemical Dump

Dear Mr. Burger:

We are writing this letter to request an extension, as provided in the Marine Corps Base Camp Lejeune Federal Facilities Agreement (Section XXIX.), to the Site Management Schedule for Site 69 (Operable Unit #4), the Rifle Range Chemical Dump. The referenced schedule is provided in Table 4-5 (pages 4-8 and 4-9) of the "Final Fiscal Year 1993 Site Management Plan for Marine Corps Base Camp Lejeune", dated September 18, 1992. The good cause for this request for extension is that the Department of Defense (DoD) policy for investigation of Installation Restoration sites which are potentially contaminated with chemical surety agents was changed in June 1992 without our knowledge.

The events leading to our request for extension are as follows:

In our letter to your agency of 10 December 1991 we outlined the issues of worker health and safety and proper storage of chemical surety materiel recovered at the referenced site. In December 1991, our understanding was that DoD policy authorized us to conduct only non-intrusive sampling (including sampling existing monitoring wells on the site) at sites potentially contaminated with chemical surety agents. We further understood we could conduct the non-intrusive sampling without substantial involvement of the U.S. Army Technical Escort Unit (TEU) or the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA), which were then involved as lead DoD agencies for sites with chemical agent contamination.

In late September 1992, as we were planning to conduct our sampling of Site 69, we called USATHAMA to discuss the proposed sampling at Site 69. We were informed the DoD policy

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for investigation of these types of sites had changed, and were directed to the U.S. Army Chemical Materiel Destruction Agency (USACMDA).

In the ensuing telephone conversations with representatives of USACMDA we were informed their agency was, as of 5 June 1992, assigned the mission for demilitarization of all "non-stockpile" chemical surety materiel. The USACMDA representatives further stated the assignment of this mission to their agency resulted from Congressional direction to the Army to establish a sole authority with the responsibility for coordinating and overseeing the study and remediation of sites contaminated with chemical surety agents. The USACMDA representatives also said current Department of Defense (DoD) policy states their agency must be involved in investigations of all Installation Restoration (IR) sites potentially contaminated with chemical surety agents. We were also told all sampling and analysis work must be coordinated through USACMDA and that both non-intrusive and intrusive sampling are permissible for these sites.

As a result of the events described above, we have sent a letter to USACMDA (of which you will receive a copy) formally requesting the following:

- written clarification of the policy for conducting RI/FS sampling and analysis at sites potentially contaminated with chemical surety agents;
- assistance with our efforts to revise our existing Remedial Investigation/Feasibility Study (RI/FS) Project Plans and conduct the necessary sampling and analyses for Site 69;
- a meeting with representatives of USACMDA at their earliest convenience to discuss the revision of the RI/FS workplans, the conducting of RI/FS sampling and analyses, and the actions required to commence this work promptly; and
- copies of the DoD documents which establish and describe USACMDA's new mission and authority for non-stockpile chemical materiel.

We intend to work within the new DoD policy guidelines to revise the RI/FS Project Plans and conduct the RI/FS sampling and analyses at Site 69 as expeditiously as possible. However, USACMDA representatives have indicated they are currently working on higher priority projects and are unsure when they will be available to provide assistance for revision of the RI/FS Project Plans and for field work at Site 69. In consideration of this, we are requesting all dates provided in the Site Management

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Schedule for Site 69 (Operable Unit #4), shown in Table 4-5 of  
the Fiscal Year 1993 Site Management Plan, be extended for  
6 months. Upon clarification by USACMDA of the timeframes  
required to revise the RI/FS Project Plans and conduct the RI/FS  
sampling and analyses, we will amend this request for extension  
and provide a revised Site Management Schedule.

Any questions concerning this matter should be directed to  
Mr. Byron Brant, our Remedial Project Manager for this effort, at  
(804)-445-2931.

Sincerely,

P. A. RAKOWSKI, P.E.  
Head  
Environmental Programs Branch  
Environmental Quality Division  
By direction of the Commander

Copy to:  
EPA Region IV (Ms. Michelle Glenn)  
MCB Camp Lejeune (Mr. George Radford)

Blind copy to:  
Baker Environmental, Inc. (Attn: Mr. Ray Wattras)  
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MCB Camp Lejeune Admin. Record File  
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★ U.S.G.P.O. 1983-403-517

PS Form 3800, Feb. 1982

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**MAIL**

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- Complete items 3, and 4a & b.
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- The Return Receipt will show to whom the article was delivered and the date delivered.

3. Article Addressed to:

NORTH CAROLINA DEPT OF ENV,  
HEALTH & NAT RESOURCES  
ATTN PETER BURGER  
P O Box 27687  
401 Oberlin Road  
Raleigh NC 27611

5. Signature (Addressee)

6. Signature (Agent)

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PS Form 3811, December 1991 ★ U.S.G.P.O. : 1992-307-530

**DOMESTIC RETURN RECEIPT**