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DEPARTMENT OF THE NAVY

ATLANTIC DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

1510 GILBERT ST NORFOLK VA 23511-2699 TELEPHONE NO

(804) 322-4818

IN REPLY REFER TO:

6280

18232:KHL:clm

DEC 06 1994

CERTIFIED MAIL RETURN RECEIPT REQUESTED

North Carolina Department of Environment, Health, and Natural Resources Attn: Mr. Patrick Watters P.O. Box 27687 401 Oberlin Road Raleigh, NC 27611

Re: MCB Camp Lejeune Remedial Investigation/ Feasibility Study Schedule Change Request Camp Geiger Fuel Farm Operable Unit No 10 (Site 35)

Dear Mr. Watters:

The purpose of this letter is to request your concurrence on proposed schedule changes for the Remedial Investigation and Feasibility Study (RI/FS) at Site 35, MCB Camp Lejeune. This request is made in accordance with Section XXIX of the Federal Facilities Agreement (FFA) of December 1989. In summary, we propose preparation of an Interim FS/PRAP/ROD to address groundwater contamination in the eastern part of the site, an additional study to investigate extent of groundwater contamination in the western portion of the site, and delay of submittal of the comprehensive FS/PRAP/ROD until results of the additional study can be incorporated. The rationale supporting this proposal is explained below.

This site is unique in several ways. Site terrain and other physical features effectively divide the site into two parts: (1) to the west, a relatively flat and well-developed upland area, and (2) to the east, a heavily-wooded and steeply sloped area that dips down to Brinson Creek. The eastern portion is the location of the Camp Geiger Fuel Farm and is also the proposed location for the construction of a 6-lane highway by the North Carolina Department of Transportation (NCDOT).

Field work recently completed in conjunction with the RI at Site 35 indicates that additional investigation is necessary to fully characterize the extent of the TCE plume in the groundwater in the western portion of the site. However, sampling results indicate that extent of petroleum and TCE contamination in the groundwater on the eastern portion of the site is well-defined. Details of these sampling results are presented in the Draft Remedial Investigation (RI) Report for Site 35 (issued 31 October 1994).

The unique characteristics of the site, sampling results, and possible courses of action were discussed at our Partnering Meeting of November 8-9, 1994. The Navy/Marine Corps feels that the unique site characteristics indicate that separate remedies will likely be required for the eastern and western portions of the site. In addition, we do not want to delay implementing a remedial action in the eastern portion of the site while we continue to collect data from the western portion. As discussed, we propose the following changes to the 1995 Site Management Plan (FY95 SMP) in order to appropriately address contamination at this site:

- 1. <u>Submission of RI Report</u>
 The Draft Remedial Investigation (RI)report has already been issued. Subsequent versions of this report will be submitted as previously scheduled in the FY95 SMP.
- 2. Submission of an Interim FS Report, PRAP, and ROD An Interim Feasibility Study (FS) Report, Interim PRAP, and Interim ROD for contaminated groundwater in the eastern portion of the site (vicinity of the Fuel Farm) will be submitted according to the schedule presented in Attachment A. Note that this schedule closely mirrors the original FY95 SMP schedule for the full FS, with only minor changes to accommodate the shift to an Interim FS submittal.
- 3. Additional Investigation
 Additional sampling will be performed to fully define extent of
 TCE contamination in groundwater on the western portion of the
 site. This sampling will be performed under the existing Project
 Plans as modified by letter to the State of North Carolina and
 EPA Region IV presenting rationale for proposed additional
 sampling. We expect this additional sampling to occur in the
 first quarter of 1995. A proposed schedule will be provided at a
 later date.
- 4. Addendum to RI Report
 The results of the additional investigation will be presented in a separate document titled "Addendum to Remedial Investigation Report." A proposed schedule for submission of this report will be provided at a later date.
- 5. Submission of a Full FS Report, PRAP, and ROD Following the Addendum to the RI Report, a full FS, PRAP, and ROD will be submitted to fully address the entire site, including specific remedial action plans for contaminated groundwater of the western portion of the site. A proposed schedule for submission will be provided at a later date.

The Navy/Marine Corps appreciates your continued involvement in this project and we hope that the these proposed changes are to your satisfaction. Please direct any questions or comments to Ms. Katherine Landman at (804) 322-4818.

Sincerely,

L. A. BOUCHER, P.E.

Laure Boucher

Head

Installation Restoration Section
(South)

Environmental Programs Branch Environmental Quality Division By direction of the Commander

Attachment

Copy to:
EPA Region IV (Ms. Gena Townsend)
MCB Camp Lejeune (Mr. Neal Paul)
Baker Environmental, Inc. (Mr. Ray Wattras, Mr. Dan Bonk)
Activity Admin Record File

ATTACHMENT A

Proposed Schedule for Interim FS/PRAP/ROD Contaminated Groundwater at Camp Geiger Fuel Farm Site 35, Operable Unit No. 10 MCB Camp Lejeune, NC

FS/PRAP	Original FY95 SMP Full FS/PRAP/ROD ¹	Proposed <u>Interim Reports²</u>	
Draft FS/PRAP	28 Nov 94	09 Dec 94	
Draft Final FS/PRAP	28 Mar 95	08 Apr 95 07 Jun 95	
Final FS/PRAP	27 May 95		
ROD			
Draft ROD	26 Jan 95	26 Jan 95	
Draft Final ROD	26 May 95	26 May 95	
Final ROD	09 Jul 95	09 Jul 95	

Notes

- 1. Full FS/PRAP/ROD reports will not be submitted until completion of additional investigation of groundwater in the western portion of Site 35. A revised schedule for submission of these reports will be submitted under separate cover.
- 2. Interim FS/PRAP/ROD reports for the remediation of contaminated groundwater in the eastern portion of Site 35 will be submitted according to the original schedule set for the Full FS/PRAP/ROD reports with the exception of the Draft FS/PRAP as indicated.

pleted on the reverse side?	 Complete items 3, and 4a & b. Print your name and address on the reverse of this form so that we can return this card to you. Attach this form to the front of the mailpiece, or on the back if space does not permit. Write "Return Receipt Requested" on the mailpiece below the article number. The Return Receipt will show to whom the article was delivered and the date delivered. 		Consult postmaster for fee. ticle Number 773		
our RETURN ADDRESS completed on	5.	Article Addressed to: NC DEPT OF ENVIRONMENT, HEALTH AND NATURAL RESOURCES ATTN MR PATRICK WATTERS PO BOX 27687 401 OBERLIN RD RALEIGH NC 27611 Signature (Addressee)	P 07 4b. Ser Regis XCerti Expr. 7. Date	cle Number 75 381 773 vice Type stered	•
S Y	PS	Form 3811 , December 1991	3-402 D	OMESTIC RETURN RECEIPT	•

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