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State of North Carolina Department of Environment, Health and Natural Resources Division of Solid Waste Management

James B. Hunt, Jr., Governor Jonathan B. Howes, Secretary William L. Meyer, Director



July 12, 1995

Commander, Atlantic Division

Naval Facilities Engineering Command

Code 1823

Attention:

MCB Camp Lejeune, RPM

Ms. Katherine Landman

Norfolk, Virginia 23511-6287

Commanding General

Attention:

AC/S, EMD/IRD

Marine Corps Base

PSC Box 20004

Camp Lejeune, NC 28542-0004

RE:

Revised Draft Point Paper from LANTDIV regarding

NCDEHNR, fax dated 7/10/95.

Dear Ms. Landman:

The referenced document has been received and reviewed by the North Carolina Superfund Section. Our comments are attached. Please call me at (919) 733-2801 if you have any questions about this.

Sincerely,

Patrick Watters

Environmental Engineer

Superfund Section

Attachment

cc: Gena Townsend, US EPA Region IV Neal Paul, MCB Camp Lejeune

Comments on Revised Draft Point Paper dated 7/10/95

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Third Paragraph of the Revised Point Paper

I do agree that established deadlines for comment submittal have not always been met and I also agree that this is not consistent with the stipulations in the FFA. I hope it is recognized however that this issue goes beyond merely issuing a declaration that the DEM must comply with the established review schedules. I do agree that the current system needs to be changed but it is important to remember that DEM (like each representative of the Lejeune team) has their own constraints and limitations which should be considered. If this is truly a "team" effort that uses a "partnering" philosophy, then adjustments and possibly some extra effort may need to be made by ALL members of the Lejeune team.

The following should be considered with regard to meeting document review deadlines.

- The Wilmington Regional Office of DEM covers several southeast counties of NC therefore it does not have the resources to dedicate a person solely to the Lejeune project.
- How many TRC meetings have we had? Do we meet on a regular basis? This could be an important vehicle by which we can solve a big part of this issue.
- How proactive have we been with regard to the concerns of the Wilmington Regional Office? We react when there is a crisis which is typically late in the process. I advocate getting them more involved up front which may mean more meetings and conferences.
- Look at the roles of the DEM-Regional Office versus the DEM-Central Office with regard to the document comment process. (This was noted in the last paragraph of the revised point paper)
- Does the Regional Office look at the proper documents? Maybe the document distribution process needs to be changed.
- Look at the document review schedule to see if it can be modified.