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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

MAR 05 1992

4WD-RCRA/FF

Mr. P.A. Rakowski, P.E.
Head
Environmental Programs Branch
Environmental Quality Division
Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511-6287

RE: MCB Camp Lejeune NPL Site
Jacksonville, North Carolina

Dear Mr. Rakowski:

The Environmental Protection Agency (EPA) offers this letter as a follow-up and clarification of the purpose and intent of a letter dated February 19, 1992, in response to your letter dated February 11, 1992. EPA appreciated the opportunity to meet with members of your staff to discuss these issues on February 19-20, 1992. I have again reviewed the issues raised in your letter and have considered the information provided to my staff in these meetings. I would like to offer the following information regarding both the specific issues raised in your letter and the response provided to you in my earlier letter.

EPA is in agreement that work completed at the subject site has been conducted in good faith and with a sincere effort by the Navy to comply with the direction provided by EPA personnel. EPA direction on this work was also provided in good faith and with a sincere effort to assist in expediting the RI/FS process while producing a defensible, high quality document. In spite of this, there apparently has been some mis-communication between our offices. At least in part this was caused when EPA provided draft internal guidance with the intent of clarifying the documentation necessary to achieve specific Agency goals. I wish to take this opportunity to ensure that our working relationship moves forward in a cooperative and non-adversarial manner.

The following items specifically address the concerns raised in your letter in light of EPA's position and the results of the recent meeting between our staffs.

EPA letter of January 22, 1992 - EPA understands the Navy's concern with receiving these comments at such a late date after submission of the draft Feasibility Study (FS) Report. Ms. Michelle Glenn discussed the rationale for submission of these comments with Ms. Laurie Boucher prior to their submission. The FS comments were provided in the event the draft FS would have to undergo a future revision.

The Navy's efforts to expedite the decision for the shallow aquifer created an oversight in the development of other documents pertaining to the shallow soils at the NPIA site. While the risk range may not necessitate development of an FS, the threat posed by continuing contamination to groundwater may require that alternatives be evaluated for remediating the soil. Evaluating the threat posed by the soil contamination is a relatively straightforward procedure and agreement was reached in the recent meeting that this work would be performed as part of the Hadnot Point RI/FS. EPA agrees, as a result of the decisions reached in the meeting, that at this time the effort to revise the FS may be postponed until the results of the evaluation of the threat posed by the soil as a continuing source to the groundwater is completed. It is understood that this will be scheduled as part of the RI/FS Supplemental Work Plan for Hadnot Point in September 1992.

EPA Letter of January 27, 1992 - EPA reiterates that these comments must be addressed. The comments do not require additional field work, they merely identify areas where the documents must be improved to comply with the NCP. The draft guidance provided has not been approved and may apply to a general situation where an interim action is warranted and a very limited amount of data is available to support the action. This is not the case here. A large body of information is available for inclusion in the Reports. Until specific final guidance has been developed, the EPA RI/FS Interim Final Guidance (1988) is the applicable guidance document. The Navy's efforts are recognized as having been made in good faith; however, it will be necessary to revise the documents to utilize all available data and current approved guidance in accordance with the NCP. It is EPA's opinion that the improvements called for in the comments can be readily accomplished. In light of the probability that the Interim Action may be acceptable as a final action, the supporting documentation must utilize all the available information to the maximum extent possible. My staff is available to provide assistance in incorporation of the comments if you feel that would be helpful.

EPA Letter of January 28, 1992 - This issue was discussed extensively in the meeting held between our staffs at MCB Camp Lejeune. The comment provided as general comment #2 in this letter indicated that insufficient information was available to reach conclusions concerning the "nature and extent of contamination" at the sites discussed in these documents. Recognition of the fact that additional studies were warranted has resulted in a decision

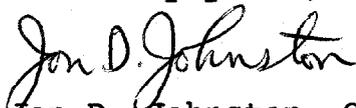
to term the documents "interim" and use the available information to formulate the work plans necessary to complete characterization of the entire Hadnot Point Industrial Area. I concur with the decision reached in the meeting that the appropriate course of action is to incorporate the necessary additional work into the work plans due for sites 21 and 24 in September 1992.

EPA appreciates the Navy's concern with schedules. EPA, as well as DoD, is under a significant amount of pressure to show significant progress at listed sites in a timely manner. EPA will provide whatever assistance is necessary to meet the Site Management Plan schedules and ensure a defensible, quality product.

I am confident that further close coordination and cooperation between our staffs will result in an excellent working relationship and fully defensible decisions as well as timely achievement of significant milestones in implementation of the RI/FS process at MCB Camp Lejeune.

If you have any questions or would like to discuss any of the above, please call me at (404) 347-7603.

Sincerely yours,



Jon D. Johnston, Chief
Federal Facilities Branch
Waste Management Division

cc: Nina M. Johnson, LANTDIV
Laurie Boucher, LANTDIV
George Radford, MCB Camp Lejeune
Jack Butler, NCDEHNR