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TRANSMITTAL FOR EXECUTED ORIGINAL OF FEDERAL FACILITY COMPLIANCE  
AGREEMENT CNC CHARLESTON SC  
3/19/1991  
NAVFAC SOUTHERN



DEPARTMENT OF THE NAVY

CHARLESTON NAVAL SHIPYARD

NAVAL BASE

CHARLESTON, S. C. 29408-6100

19 March 1991

Donald J. Guinyard, Acting Director  
Waste Management Division  
U.S. Environmental Protection Agency  
Region IV  
345 Courtland Street, N.E.  
Atlanta, Georgia 30365

Re: FEDERAL FACILITY COMPLIANCE AGREEMENT

Dear Sir:

Enclosed is the executed original of the Federal Facility Compliance Agreement, which I signed yesterday on behalf of the Charleston Naval Shipyard, permittee for the Naval Base South Complex, Charleston, South Carolina.

As noted in discussions between my attorney, Mr. Geffen and Mr. Pallas of your staff, it would appear that there are two provisions - Enforceability and Dispute Resolution - about which there remain some differences of interpretation between the Department of Defense and the EPA. These differences were pointed out to EPA in a letter dated July 1, 1988 from the then Deputy Assistant Secretary of Defense, a copy of which is also enclosed.

It is my belief that this Federal Facility Compliance Agreement will serve both the EPA and the Navy in providing a framework we will both be able to use both to assure full environmental compliance, and to ensure that significant attention will continue to be paid to stressing the environmental ethic in our workplace.

I sincerely appreciate the time and effort devoted to this matter by your staff, and look forward to working with you and your staff in the future.

Sincerely,

A handwritten signature in cursive script that reads "Paul H. Fenton".

Paul H. Fenton  
Captain, USN  
Commander, Charleston Naval Shipyard

Enclosures

Blind copy to:

CNSY 400

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NAVSEA 07

NAVSEA OOL

NAVSEA 08

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