

06.01-12/30/91-00070



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

DEC 30 1991
DEC 30 1991

4WD-RCRA & FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1822
Attn: Ms. Laurie A. Boucher, P.E.
Remedial Project Manager for MCB Camp Lejeune
Norfolk, Virginia 23511-6287

RE: Draft Informal Expedite Schedule
MCB Camp Lejeune, North Carolina

Dear Ms. Boucher:

The Environmental Protection Agency (EPA) appreciated the opportunity to participate in the teleconference December 20, 1991. This letter is per Navy request for comments regarding the Informal Expedited Schedule. Please realize that the Informal Expedited Schedule is a "best effort" schedule, and should not take into account any assumed or implied time restrictions. Additionally, the informal expedited schedule should be looked upon as reasonable and obtainable not as a schedule that is "not realistic".

If you have any questions concerning this matter, please contact me at (404) 347-3016.

Sincerely yours,

A handwritten signature in cursive script that reads "Carl R. Froede Jr.".

Carl R. Froede Jr.
Remedial Project Manager
DOD Remedial Unit
RCRA and Federal Facilities Branch
Waste Management Division

Enclosure

cc: Mr. Jack Butler, NCDEHNR
Mr. George Radford, MCB Camp Lejeune

EPA Comments on Informal Expedited Schedule

General Comments

EPA is very interested in the length of time as reflected in the "Duration" column. EPA is not as concerned with the exact "Scheduled Start" and "Scheduled Finish" dates as relates to the Informal Expedited Schedule (IES). Every attempt should be made by all parties to the Federal Facility Agreement to shorten the Duration period where appropriate, realizing that the IES is not an enforceable schedule. All schedules should be consistent and specific comments are applicable for each schedule.

Specific Comments

- 1) Please leave "Agency Review" (Draft) as 21 days, however, please change "Agency Review" (Draft Final) to 14 days.
- 2) EPA believes that the 51 day Navy turn-around time shown for the Draft Final Document could be shortened. This is based upon minor comments from NCDEHNR and EPA as a result of the opportunity to informally review the Draft documents before the official Draft documents were sent out.
- 3) The Draft ROD should be submitted to NCDEHNR and EPA within the first the two weeks after the public notice has been issued. The reasoning behind this is due to the Navy already basically knowing what remedy will be selected for the site (based upon the earlier RI/FS and proposed plan). Additionally, by getting this document out early (in Draft form) it prepares everyone's management for the selection and any hangups can be dealt with early on in the process.
- 4) For planning purposes the Draft Final ROD with responsiveness summary can be submitted by the Navy the day after the end of the comment period if there are no major comments. This document can be expedited as a result of management's previous review of the Draft ROD.
- 5) The approval/concurrence period for the Draft Final ROD can be shortened to about three days. This is because, once again, there are no surprises - management has had plenty of opportunity to review and comment on the ROD.

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET
ATLANTA GEORGIA 30365

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

CERTIFIED

P 857 678 623

MAIL

U.S. OFFICIAL MAIL

RESISTANT

ATL GA 30365 12/31/90 2 9 2

OPENED AND INSPECTED
FOR CLASSIFIED MATERIAL
BY CODE 011
DATE 1-3-91

J. Ducklow
Ms. Laurie A. Boucher, P.E.
Dept. of Navy - Atlantic Div.
NAVFACENG COM
Code 1822
Norfolk, VA 23511-6287

58 JAN 3 AM 8 25

RECEIVED
CODE 011

DOC. No. : CLEF-090970-6.01-12/30/91