

07.01-10/19/92-01144

(804) 445-2931

5090
1823:BCB:srw

OCT 19 1992

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Michelle Glenn
Waste Management Division
United States Environmental Protection Agency, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Re: MCB Camp Lejeune; Extension of the Site Management
Schedule for Site 69 (Operable Unit #4), Rifle Range
Chemical Dump

Dear Ms. Glenn:

We are writing this letter to request an extension, as provided in the Marine Corps Base Camp Lejeune Federal Facilities Agreement (Section XXIX.), to the Site Management Schedule for Site 69 (Operable Unit #4), the Rifle Range Chemical Dump. The referenced schedule is provided in Table 4-5 (pages 4-8 and 4-9) of the "Final Fiscal Year 1993 Site Management Plan for Marine Corps Base Camp Lejeune", dated September 18, 1992. The good cause for this request for extension is that the Department of Defense (DoD) policy for investigation of Installation Restoration sites which are potentially contaminated with chemical surety agents was changed in June 1992 without our knowledge.

The events leading to our request for extension are as follows:

In our letter to your agency of 10 December 1991 we outlined the issues of worker health and safety and proper storage of chemical surety materiel recovered at the referenced site. In December 1991, our understanding was that DoD policy authorized us to conduct only non-intrusive sampling (including sampling existing monitoring wells on the site) at sites potentially contaminated with chemical surety agents. We further understood we could conduct the non-intrusive sampling without substantial involvement of the U.S. Army Technical Escort Unit (TEU) or the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA), which were then involved as lead DoD agencies for sites with chemical agent contamination.

In late September 1992, as we were planning to conduct our sampling of Site 69, we called USATHAMA to discuss the proposed sampling at Site 69. We were informed the DoD policy

Re: MCB Camp Lejeune; Extension of the Site Management
Schedule for Site 69 (Operable Unit #4), Rifle Range
Chemical Dump

for investigation of these types of sites had changed, and were directed to the U.S. Army Chemical Materiel Destruction Agency (USACMDA).

In the ensuing telephone conversations with representatives of USACMDA we were informed their agency was, as of 5 June 1992, assigned the mission for demilitarization of all "non-stockpile" chemical surety materiel. The USACMDA representatives further stated the assignment of this mission to their agency resulted from Congressional direction to the Army to establish a sole authority with the responsibility for coordinating and overseeing the study and remediation of sites contaminated with chemical surety agents. The USACMDA representatives also said current Department of Defense (DoD) policy states their agency must be involved in investigations of all Installation Restoration (IR) sites potentially contaminated with chemical surety agents. We were also told all sampling and analysis work must be coordinated through USACMDA and that both non-intrusive and intrusive sampling are permissible for these sites.

As a result of the events described above, we have sent a letter to USACMDA (of which you will receive a copy) formally requesting the following:

- written clarification of the policy for conducting RI/FS sampling and analysis at sites potentially contaminated with chemical surety agents;
- assistance with our efforts to revise our existing Remedial Investigation/Feasibility Study (RI/FS) Project Plans and conduct the necessary sampling and analyses for Site 69;
- a meeting with representatives of USACMDA at their earliest convenience to discuss the revision of the RI/FS workplans, the conducting of RI/FS sampling and analyses, and the actions required to commence this work promptly; and
- copies of the DoD documents which establish and describe USACMDA's new mission and authority for non-stockpile chemical materiel.

We intend to work within the new DoD policy guidelines to revise the RI/FS Project Plans and conduct the RI/FS sampling and analyses at Site 69 as expeditiously as possible. However, USACMDA representatives have indicated they are currently working on higher priority projects and are unsure when they will be available to provide assistance for revision of the RI/FS Project

Re: MCB Camp Lejeune; Extension of the Site Management
Schedule for Site 69 (Operable Unit #4), Rifle Range
Chemical Dump

Plans and for field work at Site 69. In consideration of this, we are requesting all dates provided in the Site Management Schedule for Site 69 (Operable Unit #4), shown in Table 4-5 of the Fiscal Year 1993 Site Management Plan, be extended for 6 months. Upon clarification by USACMDA of the timeframes required to revise the RI/FS Project Plans and conduct the RI/FS sampling and analyses, we will amend this request for extension and provide a revised Site Management Schedule.

Any questions concerning this matter should be directed to Mr. Byron Brant, our Remedial Project Manager for this effort, at (804)-445-2931.

Sincerely,

P. A. RAKOWSKI, P.E.
Head
Environmental Programs Branch
Environmental Quality Division
By direction of the Commander

Copy to:
NCDEHNR (Mr. Peter Burger)
MCB Camp Lejeune (Mr. George Radford)

Blind copy to:
Baker Environmental, Inc. (Attn: Mr. Ray Wattras)
1823 BCB (2 copies)
18S
MCB Camp Lejeune Admin. Record File
f:\admin\typeout\SCHDEX}4.BCB

P 681 351 923

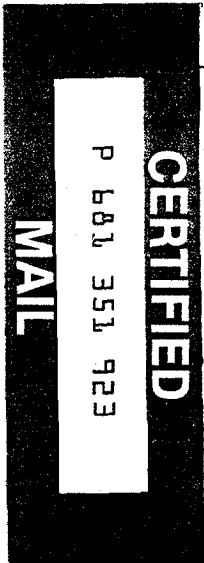
RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, Feb. 1982

★ U.S.G.P.O. 1983-403-517



P 681 351 923

CERTIFIED

MAIL

Sent to	US EPA, Region IV	
Street and No.	Michelle Glenn	
P.O., State and ZIP Code	Atlanta, GA 30365	
Postage	\$	
Certified Fee		
Special Delivery Fee		
Restricted Delivery Fee		
Return Receipt Showing to whom and Date Delivered		
Return receipt showing to whom, Date, and Address of Delivery		
TOTAL Postage and Fees	\$	
Postmark or Date	Feb 20 1991	

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- 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.

I also wish to receive the following services (for an extra fee):

- 1. Addressee's Address
- 2. Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
 US EPA REGION IV
 WASTE MGT DIV
 MS MICHELLE GLENN
 345 COURTLANT ST NE
 ATLANTA GA 30365

5. Signature (Addressee)

6. Signature (Agent)

4a. Article Number
 P 681 351 923

4b. Service Type
 Registered Insured
 Certified COD
 Express Mail Return Receipt for Merchandise

7. Date of Delivery

8. Addressee's Address (Only if requested and fee is paid)

Thank you for using Return Receipt Service

PS Form 3811, December 1991 ★ U.S.G.P.O.: 1992-307-530

DOMESTIC RETURN RECEIPT