



06.01-07/13/92-01151

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

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

JUL 13 1992

4WD-RCRA/FF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Byron Brant
Department of the Navy - Atlantic Division
Naval Facilities Engineering Command
Code 1822
Norfolk, Virginia 23511-6287

RE: Marine Corps Base Camp Lejeune NPL Site
Jacksonville, North Carolina

Dear Mr. Brant:

This letter provides you with the EPA's comments on the draft Interim Record of Decision for the Shallow Aquifer at the Hadnot Point Industrial Area Operable Unit. EPA's comments are enclosed.

If you have any questions or comments, please call me at (404) 347-3016.

Sincerely,

A handwritten signature in black ink that reads "Michelle M. Glenn". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Michelle M. Glenn
Senior Project Manager

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

Review and Comments
Draft Interim Remedial Action Record
of Decision for the Shallow Aquifer at
the Hadnot Point Industrial Operable Unit

1. The Declaration functions as an abstract for the key information contained in the ROD and is the section of the ROD to be signed by the President's delegate in the Lead Agency.
2. The segment labeled "Declaration" should be retitled "Statutory Determinations".
3. Also, on page 2 of the Declaration - In the third bullet, replace "...volatile organic compounds..." with, "...the contaminated groundwater...".

Consolidate bullets 4 and 5 and label them "institutional controls".

In the last bullet, replace "evaluate" with "monitor".

4. Page 1, Section 1.0 - Please make it very clear up front that this document only addresses the shallow aquifer.
5. Page 5, 1st paragraph - Please note that the deep aquifer will be investigated further and addressed separately.
6. Page 6, Section 4.0 - This section should also note that this Interim remedy will reduce any potential threat to environmental receptors.
7. Page 7, Section 6.0 - Please state clearly that multiple contaminants were detected above MCLs and this finding was the basis for proceeding with an Interim action.

2nd paragraph - Delete the portion of the last sentence after the comma.

8. Page 9, "Alternative 1" - The nine criteria are referenced in this paragraph, however, they have not yet been defined for the reader. Please rewrite this sentence.
9. Page 9 - In the sentence at the bottom of the page please replace "treating" with "halting".
10. Page 14, "Alternative 3", bottom of the page - The discussion of ARARs is incomplete. There is no reference to the NPDES requirements, potential Air emissions ARARs and the possibility of RCRA being applicable to the treatment system when the contaminated water is introduced. Information on these ARARs as well as any others identified in the course of this ROD development must be included.

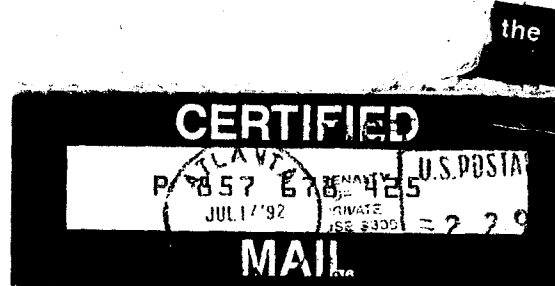
11. Page 15 and the remaining discussions - Comment 10 applies to all of the alternatives described in the "Description of Alternatives" section.
12. Page 17, "Compliance with ARARs" - This discussion should include air emissions and RCRA.
13. Page 19, "Reduction of Toxicity, Mobility or Volume" - The pump and treat alternatives will only reduce the volume of contaminants in the contaminated groundwater.
14. Page 19, "Short-term Effectiveness" - The last sentence is awkward. Please simplify it in the text.
15. Page 19, "Implementability" - Only the substantive technical requirements of permits must be met for a remedial action implemented on-site.
16. Page 20, "Community Acceptance" - EPA will review this segment of the ROD when it is submitted in the draft final document.
17. Page 20, Section 9.0 - The discussion of the selected remedy in this section of the ROD should expand upon the details of the remedy from the Description of Alternatives discussed earlier in the document. Please see Page 6-26 of "The Guidance on Preparing Superfund Decision Documents", 1989.
18. Page 20, Section 9.0, 2nd paragraph - This paragraph must be rewritten. The process of alternative modification described here would require reopening the ROD and preparing a new proposed plan. This would entail a new comment period and necessitate another public meeting. Use of performance specifications may eliminate this confusing language.
19. Page 21, Section 9.0 - See page 6-27 of the guidance for an example of the degree of detail necessary for the cost estimate.
20. Page 22, Section 11.0 - EPA looks forward to reviewing the Responsiveness Summary.

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REGION IV
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Mr. Byron Brant GLNND001
~~LAURIE A. DOUCHER, P.E.~~
COMMANDER, ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
CODE 1822
NORFOLK VA 23511-6287

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