



UNITED STATES MARINE CORPS
MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA 28542-5001

BO 6280.1
FAC/mlb
4 May 1988

BASE ORDER 6280.1

From: Commanding General
To: Distribution List

Subj: INSTALLATION RESTORATION (IR) PROGRAM/HAZARDOUS WASTE SITE CLEANUP

Ref: (a) Resource Conservation and Recovery Act (RCRA) (42 U.S.C. 9601, et seq) (NOTAL)
(b) EPA Regulations contained in 40 CFR parts 260-265 and 40 CFR parts 122-124 (NOTAL)
(c) MCO P11000.8B
(d) Contract No. N62470-83-C-6106, Confirmation Study for Marine Corps Base, Camp Lejeune (NOTAL)
(e) BO 6240.5A

Encl: (1) Installation Restoration (IR) Program Timetable
(2) List of Abbreviations

1. Purpose. To provide policy, prescribe procedures and assign responsibilities for the conduct of the Installation Restoration (IR) program (cleanup of old hazardous waste sites) located in and on the land of the Camp Lejeune and Marine Corps Air Station, New River complex.

2. Applicability and Scope. This policy and guidance applies to all Department of Defense agencies, military organizations and other authorized activities located on the Camp Lejeune and Marine Corps Air Station, New River complex and applies to all known, and newly discovered hazardous waste sites.

3. Background

a. The nation's Hazardous Waste (HW) Management Program was established by the Resources Conservation and Recovery Act (RCRA), reference (a). Federal regulations promulgated by the Environmental Protection Agency (EPA) to implement this HW management program are found in reference (b). Marine Corps policy, responsibilities and guidance are found in reference (c).

b. The Marine Corps uses and produces large quantities of hazardous materials and waste products. Lack of stringent legislation in the past led to the use of expedient disposal methods that threaten human health and the overall quality of the environment. Past hazardous waste disposal relied on burial. Although acceptable at the time, this method has caused long-term problems through release of hazardous pollutants into the soil and ground water. Residential and municipal wells have been contaminated by hazardous wastes improperly dumped or buried many years ago. In some cases, residential and commercial developments have been built on old disposal sites resulting in serious human health problems. These environmental and health problems have led to greatly increased national concern regarding past disposal practices.

c. A Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) set up a "Superfund" for hazardous waste (HW) site cleanups nationwide. The Department of Defense established an Installation Restoration (IR) program to assess and cleanup old HW sites. Funding for DoD HW site cleanup is provided through the Defense Environmental Restoration Account (DERA). The Superfund Amendments and Reauthorization Act (SARA) of 1986 made major changes to CERCLA and established the Defense Environmental Restoration Program (DERP) which reauthorized DERA to pay for the IR program. Congress for the first time statutorily recognized the relationship between the IR program and CERCLA.

d. The Department of the Navy established the Navy Assessment and Control of Installation Pollutants (NACIP) Program, now known as the Navy Installation Restoration (IR) Program, in accordance with the DoD concept plan to identify, evaluate,

control, and correct past deficient waste disposal sites and practices. Similar to other Department of the Navy environmental programs, the IR Program is oriented toward compliance with federal and state environmental laws and regulations. The IR Program consists of three basic phases of action: two to identify the presence of hazardous wastes and evaluate effects on the environment, and a third phase to identify and program any required corrective measures.

(1) Preliminary Assessment/Site Inspection (PA/SI). The PA/SI formerly called initial assessment studies involves an extensive review and evaluation of existing records located at the activity and elsewhere, an examination of the activity's waste disposal history, and identification of any potential or existing pollutant problems at the activity. The PA/SI of Marine Corps Base Camp Lejeune was completed in April 1983 by Water and Air Research, Inc., under the direction of the Naval Energy and Environmental Support Activity, Port Hueneme, California. Based on information from historical records, aerial photographs, field inspections, and personnel interviews, a total of 76 potentially contaminated sites were identified. Each of the sites was evaluated with regard to contamination characteristics, migration pathways and pollutant receptors. The study concluded that while none of the sites pose an immediate threat to human health or the environment, 22 sites warrant further investigation to assess potential long-term impacts.

(2) Remedial Investigation/Feasibility Study (RI/FS). A RI/FS, formerly called the confirmation studies, will verify problems uncovered by the PA/SI study through physical and/or analytical testing and monitoring of suspected hazardous pollutants. RI/FS studies might include, but are not limited to, soil and ground water sampling and analysis, pollutant characterization and detailed analysis of remedial alternatives. RI/FS studies for the 22 sites at Marine Corps Base Camp Lejeune identified for further investigation by the PA/SI are being conducted by Environmental Science and Engineering, Inc., under reference (d) through the Atlantic Division, Naval Facilities Engineering Command. Both the PA/SI studies and RI/FS studies are funded from pollution abatement funds managed by the Naval Facilities Engineering Command (NAVFACENGCOM).

(3) Remedial Design/Remedial Action (RD/RA). The RI/FS study may indicate the need for remedial actions such as cleanup of the old HW site. First priority will be given to remedial actions to control contamination migrating from Marine Corps property when such migration poses an immediate threat to the health and welfare of the installation or adjacent community. Corrective measures will be programmed in normal appropriation accounts utilizing NAVFACENGCOM-managed pollution abatement funds for projects of military construction scope and Marine Corps minor construction funds for projects of lesser scope.

e. Marine Corps policy is to comply with local, State, and Federal regulations concerning generation, transportation, storage, treatment, and disposal of hazardous wastes. Implementation of this policy is being accomplished in a program consisting of two parts. The first part addresses proper handling of day-to-day generated wastes. This part of the program is promulgated through reference (e). This Order implements the second part, which is a program to determine where hazardous wastes have been deposited in the past, assess the present and future environmental impact of the waste, and provide for control measures.

4. Discussion

a. There are some major impacts on federal installations as a result of the Superfund Amendments and Reauthorization Act (SARA). First, CERCLA, as modified by SARA, is expressly applicable to federal facilities and it defines the process by which federal facilities are required to take remedial actions at their facilities. Second, there are mandatory schedules that must be met. See enclosure (1).

(1) Preliminary Assessments/Site Inspections (PA/SI) must be completed by April 1988.

(2) Data from the PA/SI will be used by EPA to score each site in the Hazard Ranking System (HRS). (EPA is currently revising its HRS as mandated by SARA. The current HRS will be ineffective after 17 October 1988). Scoring will be accomplished prior to April 1989. Sites with a HRS score above 28.5 are considered of national

concern and are candidates for listing on the National Priority List (NPL) and are eligible for funding under DERA for cleanup.

(3) If a facility is listed on the NPL it has six months to initiate Remedial Investigation/Feasibility Study (RI/FS) action in consultation with EPA and appropriate State authorities. Time to complete the RI/FS is negotiable and must include public participation.

(4) Within 180 days after completion of the RI/FS, MCB Camp Lejeune must enter into an interagency agreement with EPA and appropriate State authorities for the expeditious completion of all necessary remedial action at Camp Lejeune. This Remedial Design/Remedial Action (RD/RA) is the third phase of the Installation Restoration (IR) Program and consists of cleanup of the old HW dump sites. Substantial continuous physical onsite remedial action shall be commenced not later than 15 months after completion of the RI/FS.

b. This order formally establishes the Installation Restoration (IR) Program for the Marine Corps Base Camp Lejeune and Marine Corps Air Station, New River complex in accordance with references (a), (b) and (c). Enclosure (2) is a List of Abbreviations commonly used in this program.

5. Action

a. Responsibilities, procedures and guidance for the Hazardous Material (HM) and Hazardous Waste (HW) Programs are provided in reference (e).

b. The Assistant Chief of Staff, Facilities, Marine Corps Base, is designated the activity point of contact to establish, direct, maintain and coordinate the Marine Corps Base Camp Lejeune and Marine Corps Air Station, New River complex, Installation Restoration (IR) Program. The Assistant Chief of Staff, Facilities will be assisted in accomplishment of specific tasks by the Marine Corps Base Environmental Engineer, the Director, Natural Resources and Environmental Affairs Division (NREAD), the Office of the Staff Judge Advocate, the Director, Joint Public Affairs Office, and an Installation Restoration Steering Committee.

(1) The Environmental Engineer is responsible for broad planning and management issues, in accomplishment of the goals and objectives of the Camp Lejeune IR Program. Responsibilities include:

(a) Documentation of IR studies, and actions and maintenance of complete administrative record.

(b) Liaison and coordination with federal EPA, appropriate State and local authorities, the Technical Review Committee and the IR Steering Committee.

(c) Development of a concise action plan in accordance with IR short and long term objectives.

(d) Compliance with federal and state regulations.

(e) Identification of program requirements and projects and forwarding of funding requirement information to Headquarters, Marine Corps (LF/LFL) as part of the Annual Operation Plan.

(f) Establishment of a Technical Review Committee (TRC) to review and comment on MCB Camp Lejeune actions and proposed actions with respect to releases or threatened releases of hazardous substances. Membership shall include EPA, DoD, appropriate state and local authorities and a public representative of the community.

(2) The Director, Natural Resources and Environmental Affairs Division (NREAD) is responsible for the management of the HM/HW Program outlined in reference (e). In addition the Director, NREAD will:

(a) Develop and implement appropriate HM/HW information and education programs.

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(b) Provide on-site environmental support as requested to commanders, staff officers and project managers for such issues as training exercises, construction and maintenance projects for which they may be responsible.

(c) Provide site inspection reports.

(d) Submit recommendations for program projects.

c. The Office of the Staff Judge Advocate is responsible for:

(1) Advice and recommendations to ensure compliance with federal and state regulations.

(2) Assistance in developing necessary interagency agreements in support of the IR program required during the RI/FS phase.

(3) Assistance in citizen suits and other legal considerations such as Tort Claims, personal liability, and FOIA.

d. The Joint Public Affairs Office is responsible for:

(1) Development of public affairs guidance concerning IR program activities.

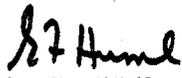
(2) Development and implementation of a formal Community Relations Plan (CRP) for both remedial and removal actions. Guidelines are 40 CFR 300.67 and SECNAVINST 5720.44A.

e. An Installation Restoration Steering Committee is established to provide advice and recommendations on procedures, priorities, planning and management for the IR program on Marine Corps Base Camp Lejeune and Marine Corps Air Station, New River complex. The Installation Restoration Steering Committee will consist of the following members:

Assistant Chief of Staff, Facilities -- Chairman
Representative, 2d Marine Division
Representative, 2d Force Service Support Group
Representative, Marine Corps Air Station, New River
Representative, Naval Hospital
Base Maintenance Officer
Environmental Engineer, Facilities Department
Representative, NREAD, Facilities Department
Representative, Office of the Staff Judge Advocate
Representative, Joint Public Affairs Office
Representative, Public Works Division
Representative, Base Safety Division

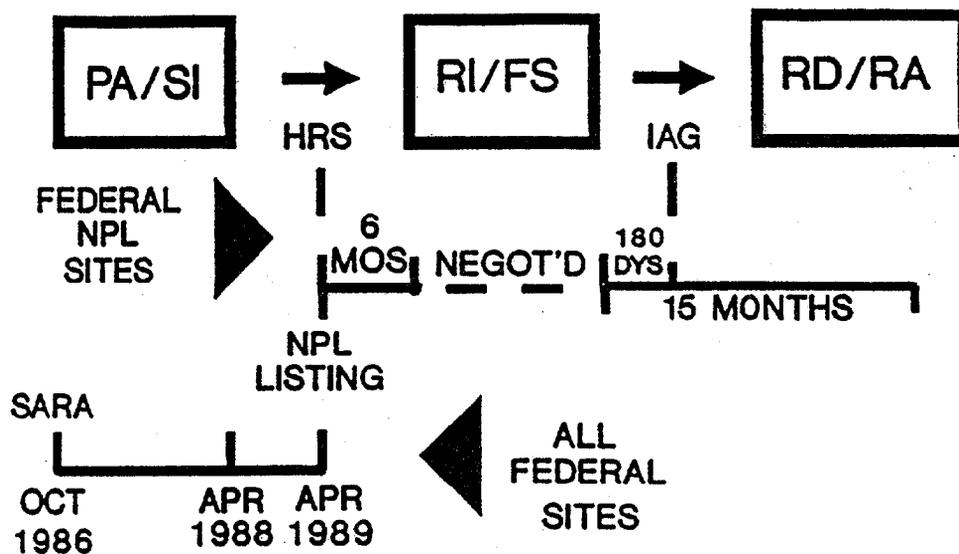
The Committee will meet as required on call of the Chairman.

6. Concurrence. This Order has been coordinated with and concurred in by the Commanding Generals, II Marine Expeditionary Force, 2d Marine Division, FME, 2d Force Service Support Group (Rein), FME, 6th Marine Expeditionary Brigade, FME, and the Commanding Officers, Marine Corps Air Station, New River, Naval Hospital and the Naval Dental Clinic.


G. F. HUML
Chief of Staff

DISTRIBUTION: A

INSTALLATION RESTORATION (IR) PROGRAM TIMETABLE



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LIST OF ABBREVIATIONS

ARAR	Applicable or Relevant and Appropriate Requirement
ATSDR	Agency for Toxic Substances and Disease Registry
BD/DR	Building Demolition/Debris Removal
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act: original 1980 Act set up "Superfund" for hazardous waste (HW) site cleanups nationwide
CERCLIS	CERCLA Information System
CFR	Code of Federal Regulations
CMC	Commandant of the Marine Corps
CNO	Chief of Naval Operations
CS	Confirmation Study
CSRS	Confirmation Study Ranking System
CWA	Clean Water Act of 1977
DEQPPM	Defense Environmental Quality Program Policy Memorandum
DERA	Defense Environmental Restoration Account: established by Congress, under SARA, to fund DoD HW site cleanups, building demolition, and HW minimization projects, FY87 = \$375M; FY88 = \$403M
DERP	Defense Environmental Restoration Program
DoD	Department of Defense
DoN	Department of the Navy
DPL	Defense Priority List
EO	Executive Order
EPA	Environmental Protection Agency
GAO	General Accounting Office
FAR	Federal Acquisition Regulations
FOIA	Freedom of Information Act
FY	Fiscal Year
HHS	Department of Health and Human Services
HRS	Hazard Ranking System: data from PA/SI is scored by EPA using this methodology
HSWA	Hazardous and Solid Waste Amendments of 1984
HWDMS	Hazardous Waste Data Management System
IAS	Initial Assessment Study

ENCLOSURE (2)

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IR Installation Restoration: DoD's program to assess and cleanup old HW sites; funded by DERA

LTM Long-Term Monitoring

NACIP Navy Assessment and Control of Installation Pollutants

NCP National Contingency Plan

NEESA Naval Energy and Environmental Support Activity

NOSC Naval Ocean Systems Center

NPL National Priority List: sites with HRS Scores above 28.5 are considered of national concern and are eligible for Superfund if no "responsible party" can be found; eight Navy activities have been proposed for the list; Navy NPL sites receive first priority for DERA funds

NRC National Response Center

NRT National Response Team

PA/SI Preliminary Assessment/Site Inspection: first phase in the DoD IR and EPA Superfund programs; consist of record searches, interviews, initial data collection for scoring purposes

PRP Potentially Responsible Party: PRPs can be any federal, state, or private entity who owns, owned, transported to, or generated hazardous waste at the site; PRPs have "joint and several" liability for assessment and cleanup of the site; if EPA cannot find a PRP, it can use Superfund money; the Navy has been named as a PRP at over 30 sites

RA Remedial Action

RCRA Resource Conservation and Recovery Act of 1976: amended the old Solid Waste Disposal Act and established the nation's HW Management program; Solid Waste Disposal Act and established the nation's HW Management program; includes requirements for Underground Storage Tanks (UST)

RD/RA Remedial Design/Remedial Action: third phase of IR and Superfund program; consists of cleanup phase; emerging on-site technologies for decontamination are required where "practicable;" off-site transportation and disposal are discouraged

RI/FS Remedial Investigation/Feasibility Study: second phase in IR and Superfund programs; consist of groundwater profiles, site sampling, pollutant characterization and detailed analysis of remedial alternatives

ROD Record of Decision. From a list of alternatives presented as an RI/FS, EPA will select the remediation option that provides the most cost-effective protection to human health and the environment. After announcement and explanation of its selection, and an opportunity for public comment, EPA will publish its final ROD document.

SARA Superfund Amendments and Reauthorization Act of 1986: makes major changes to CERCLA and RCRA; sets requirements for Defense Environmental Restoration Account (DERA)

SWMU Solid Waste Management Unit

TSD Treatment, Storage, and Disposal

UST Underground Storage Tank

ENCLOSURE (2)