

08.01-04/12/89-00174



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

IN REPLY REFER TO:

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APR 12 1989

From: Commanding General, Marine Corps Base, Camp Lejeune  
To: Commandant of the Marine Corps (Code LFL, Mr. Rob Warren),  
Washington, D.C. 20380-0001  
Commander, Atlantic Division, Naval Facilities Engineering  
Command (Code 1152, ~~Mr. Sheila Ashton~~), Norfolk, VA  
23511-6287

Subj: FEDERAL FACILITY AGREEMENT MEETING WITH EPA AND STATE OF  
NORTH CAROLINA REPRESENTATIVES ON 26 APRIL 1989

1. Our staff has discussed various issues relative to the subject meeting and has come to the conclusion that we need to develop a more detailed agenda. Since we are meeting on 25 April 1989 prior to the 26 April 1989 meeting with EPA and the State, we have developed a number of agenda items for discussion and have listed them below. Please review these items, add items as required, and recommend development of a formal agenda that could be provided to all prior to the meetings.

a. Camp Lejeune - HQMC discussions, 2230, 25 April 89:

(1) Does HQMC really desire IAG negotiations before RI/FS and ROD are completed?

(2) What is there to negotiate if cleanup standard, selected methodology and schedule are unknown?

(3) What does HQMC perceive the role of "stipulated penalties" in IAG negotiations if that is currently boiler plate but appears to again be the subject of negotiation between DoD/EPA?

(4) What background can HQMC provide re above?

(5) Does HQMC want one IAG for entire base or separate IAGs (e.g., interim response at Hadnot Point Industrial Area)?

(6) HQMC position re cleanup standard? (How clean is clean?) Who drives this issue?

b. Camp Lejeune - HQMC - DAVIS APPROXIMATION Discussion, 1430, 25 April 89:

(1) Where do we stand on RI/FS for Hadnot Point Industrial Area?

(2) What is status of response to EPA/NOI comments on draft RI/FS for Hadnot Point Industrial Area?

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(3) What is status of RI/FS for remaining 19 Camp Lejeune sites?

(4) To what extent is/will be Hadnot Point deep aquifer addressed in IR program?

(5) When should we expect that cleanup technology will be identified for all Camp Lejeune sites?

(6) When does TRC need to meet next with regard to Hadnot Point Industrial Area?

(7) Should a single IAG be negotiated for all of Camp Lejeune, an IAG for an interim response at Hadnot Point Industrial Area followed by either another IAG for remaining sites or addendum or???

(8) What is there to negotiate without known cleanup-standard, cleanup technology and schedules?

(9) What AKARs has contractor identified?

(10) What is EPA's position with regard to current status of IR program at Camp Lejeune? (Satisfied, frustrated, pressing for action...???)

(11) What contact has there been with North Carolina? What is State's perception of IR program at Camp Lejeune (satisfied, frustrated, pressing for action...???)?

(12) What is CERCLA/SARA overlap?

(13) While LANTNAVFACENGCOM has the "lead" in the negotiations, what does that term actually entail?

(14) Has a timetable/list of deadlines for expeditious completion of an RI/FS for the facility been established for Camp Lejeune, and what are they?

c. Camp Lejeune - HOMC - LANTNAVFACENGCOM - EPA - N.C. discussions, 0830, 26 April 89:

(1) LANTNAVFACENGCOM provide information brief on current status of program for all Camp Lejeune sites (what has been done, what is to do, what is underway, when events will occur...).

(2) EPA: Does EPA desire one IAG for all of Camp Lejeune, one IAG for all but Hadnot Point Industrial Area and an "interim response" there or what?

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(3) Does listing on NPL bring all sites into one agreement or only site which caused listing?

Is State role re RCRA corrective actions, CERCLA/RCRA overlap and what  
DEP removal/remedial actions?

(5) If RCRA corrective action is incorporated in IAG, what work needs to be done re existing DDMUR from a RI/FS perspective?

(6) By its letter of 22 September 1988, N.C. Department of Natural Resources and Community Development indicates that it wants "to begin discussions on a Special Order by Consent (SOC) between the Marine Corps and the NC Environmental Management Commission" (re Hadnot Point Industrial Area groundwater cleanup). Considering the State's role under IAG is not this agreement redundant?

(7) Should not a single set of negotiations in IR context be used vice multiple negotiations with a view toward environmental cleanup?

(8) Provide a copy of DoD/EPA model language (boiler plate) for standard clauses so that at a later meeting questions/ambiguities can be addressed.

(9) Provide a copy of DoD/EPA optional IAG clauses with a view to discussion which we would want included (with discussion at a later meeting).

(10) Provide copy of recently promulgated DoD/EPA/State model clauses (17 March 89) so that all parties can review and discuss applicability/IAG incorporation at a later meeting.

(11) Status Camp Lejeune NPL listing?

2. If we address the various items indicated for the various sites, we stand, where we are going and have a clearer picture of where we get there. The tone of pending meetings should be "information exchange and issue clarification" vice "pre-negotiation discussions."

3. I am not of the opinion that we have sufficient information or have sufficiently progressed to enter the "pre-negotiation" discussion phase. Use of the word "negotiations" in any form may inappropriately raise expectations which cannot be met and may have significant negative community relations overtones if

