

UNITED STATES MARINE CORPS
Environmental Management Department
Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

6286
BEMD

From: Assistant Chief of Staff, Environmental Management
Department, Camp Lejeune
To: Director, Public Affairs Office, Camp Lejeune
Subj: RESPONSE TO STUMP SOUND ENVIRONMENTAL GROUP QUESTIONS
Encl: (1) Response to questions
(2) Dr. Grant's ltr w/encl

1. The enclosure contains responses prepared by the IRP and SJA for the Stump Sound Environmental Group questions.
2. Point of contact is Stephany Del Re', Installation Restoration Manager, Environmental Management Department, at extensions 5093/5094.

J. I. WOOTEN

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- 1a. The Defense Environmental Restoration Program (DERP) was established in 1984 to promote and coordinate efforts for the evaluation and cleanup of contamination at DoD installations. The annual Defense Appropriations Act provides funding for DERP. Camp Lejeune's Installation Restoration Program (IRP) is funded by the Defense Appropriations Act through the Department of the Navy.
- 1b. Funding from 1980 to August 1989 was approximately \$500,000. Since August 1989, the Department of the Navy has programmed a little over 2 million to Camp Lejeune for FY'90.
- 1c. Camp Lejeune anticipates funding will be increased in the future to cover remedial investigations/feasibility studies as well as addressing the permanent cleanup.
- 1d. Since being placed on the National Priorities List (NPL) in October of 1989, Camp Lejeune has received over 2 million dollars to conduct Installations Restoration activities. This represents a level of funding which allows this command to fulfill its installation restoration responsibilities.
- 2a. EPA, the State, Department of the Navy, Camp Lejeune and the general public will provide input on selected cleanup alternatives. The US EPA has oversight responsibilities under CERCLA. The site cleanup remedy will be decided by the Commanding General, subject to being overruled by the Administrator of the US EPA.
- 2b. Sites are delisted from the NPL by the EPA based on meeting cleanup requirements. A notice to delist a site is required to be published in the Federal Register.
- 2c. Yes, Marine Corps Base Camp Lejeune/MCAS, New River is listed as one site on the NPL.
- 2d. Yes, the general public is given 60 days to comment on the preferred cleanup alternative.
3. Camp Lejeune hired an Installation Restoration (IR) Manager in August 1989. The IR manager is an environmental scientist with 11 years of experience with the EPA Superfund office. The IR Program is under the Environmental Management Department.
- 4a. Site discovery is provided through records, base employees, private citizens, etc. Site evaluation is conducted by the IR manager with private contractors. This technical information is given to EPA and the State to determine the need for further remedial investigation/feasibility studies.

4b. A feasibility study will be prepared by a civilian contractor, which will discuss several cleanup alternatives. As stated previously, EPA, the State, Navy, Marine Corps and the general public will provide input on the selected cleanup alternatives.

4c. Civilian contractors will implement the remedial action. The IR manager will oversee all construction activities.

4d. Long term monitoring will be provided by Marine Corps Base, Camp Lejeune employees or by a civilian contractor depending upon the type of O&M to be performed.

5a. Aerial Photo analysis, field trips, records, and interviews are all used in identifying potential hazardous waste sites.

5b. No, the Base has not conducted any shellfish sampling to date. The Base is scheduled to start sampling sediment, shellfish and ground water in June 1990.

5c. Hazardous waste sites have been denoted by posted signs warning of hazards where appropriate.

6a. The initial stage, a Preliminary Assessment or PA, is an installation wide study to determine if sites are present that may pose hazards to public health or the environment. Available information is collected on the source, nature, extent and magnitude of actual and potential hazardous substance releases at Camp Lejeune's Site Inspection or SI, consists of limited sampling and analysis to determine the existence of actual site contamination. Uncontaminated sites are eliminated from the later stages of the IRP process.

6b. Contaminated sites are fully investigated in the Remedial Investigation/Feasibility Study or RI/FS. The RI may include a variety of site investigative, sampling and analytical activities to determine the nature, extent and significance of contamination. Concurrent with these investigations, the FS is conducted to evaluate remedial actions for the site.

6c. After agreement is reached with appropriate EPA and/or state regulatory authorities on how the site will be cleaned up, Remedial Design/Remedial Action or RD/RA work begins. During this phase, detailed design plans for the cleanup are prepared and implemented.

The exception to this sequence involves Removal Actions and Interim Remedial Actions. These actions may be conducted at any time during the IRP to protect public health or control contaminant releases to the environment. Such measures may include providing alternate water supplies to local residents, removing concentrated sources of contaminants or constructing structures to prevent the spread of contamination.

6d. Four wells are situated around the Sanitary Landfill that are monitored annually in accordance with the Landfill permit.

7. Cleanups under the Superfund process are required to address current risk as well as speculative future risks.

8a. Full cleanups have not been accomplished to date on Camp Lejeune. Long term monitoring is required by the Resource Conservation and Recovery Act. Depending on cleanups chosen in the future, operation and maintenance requirements will be documented in the FS for public review.

8b. Each cleanup will meet the requirements of the law.

8c. These issues will be addressed in each site's remedial action plan.

9. Camp Lejeune is subject to the Resource Conservation Recovery Act which establishes a cradle-to-grave program for the management of hazardous waste. Marine Corps Base, Camp Lejeune is a RCRA permitted facility. The RCRA permit may be reviewed by the public. Marine Corps Base also has internal regulations which effect the RCRA program.

10. Marine Corps Base, Camp Lejeune does not have a hazardous waste landfill. Hazardous waste are disposed of through the Defense Logistics Agency, which in turn contracts with permitted waste disposers or treaters.

11. Marine Corps Base, Camp Lejeune has not received any reports of Agent Orange (dioxin) having been stored or disposed of on the base. Sampling events have not documented any dioxin or elements of dioxin.

UNITED STATES MARINE CORPS
Environmental Management Department
Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

6286
BEMD
4 May 90

From: Assistant Chief of Staff, Environmental Management
Department
To: Director, Public Affairs Office, Camp Lejeune
Subj: STUMP SOUND ENVIRONMENTAL GROUP QUESTIONS
Ref: (a) Dir, Public Affairs Office ltr JPAO dtd 19 Mar 90
Encl: (1) AC/S, EMD ltr 6286 BEMD dtd 21 Mar 90
(2) Response to subject questions

1. The reference was received by this office for action. Due to the nature of the subject, your letter was forwarded to Staff Judge Advocate for assistance as indicated by enclosure (1). Enclosure (2) contains responses prepared by the IRP and SJA for the subject questions.

2. Point of contact for this matter is Ms. Stephany Del Re, Environmental Management Department at extensions 5093/5094.

J. I. WOCTEN

Copy to:
SJA

UNITED STATES MARINE CORPS
Marine Corps Base
Camp Lejeune, North Carolina 28542-4001

5286
BEND
21 Mar 90

From: Assistant Chief of Staff, Environmental Management
Department
To: Staff Judge Advocate
Subj: STUMP SOUND ENVIRONMENTAL GROUP QUESTIONS OF 15 MARCH 1990
Encl: (1) Dir, PAC ltr 5727/JPAC of 19 Mar 90

1. The enclosure contains subject questions with a request for AC/S, EMD to provide written answers. Due to possible legal issues with some of the eleven questions, it is requested that Staff Judge Advocate assist this office in answering the questions.

2. The EMD point of contact is Mrs. Stephany Del Re-Johnson at extension 2471.

J. I. WOOTEN

Copy to:
EACW



UNITED STATES MARINE CORPS
PUBLIC AFFAIRS OFFICE
P.O. BOX 8438
CAMP LEJEUNE, NORTH CAROLINA 28542-5000
919-451-5655/1607/FAX - 5882

IN REPLY REFER TO:

5727
JPAO
19 Mar 1990

From: Director, Public Affairs Office
To: AC/S, Environmental Management Department
Subj: STUMP SOUND ENVIRONMENTAL GROUP QUESTIONS
Encl: (1) Dr. Grant's ltr w/encl

1. The enclosure contains questions proposed by the Stump Sound Environmental Group.
2. Request you provide this office written answers to the questions contained in the enclosure.
3. Point of contact is Capt Ken White.

S. W. Wagner
S. W. WAGNER

Copy to:
C/S, MCB



Rt 2, Box 431
Sneads Ferry, NC 28460
Mar 15, 1990

Commanding General
Marine Corps Base
Camp Lejeune, NC 28542

Dear Sir:

Captain White, of your Public Affairs staff, contacted me, and several others in this area, and invited us to comment on Toxic Waste Site (TWS) cleanups on Camp Lejeune. We thank you for this opportunity.

In order to discuss and comment intelligently on this subject, several of us met and identified a number of aspects upon which we might wish to comment if we had more information. Accordingly, enclosed are listed a few questions, the answers to which, if you can provide them, would prepare us, either individually or as a group, to meet with your staff. In fact, to save time, the information requested could be provided to us at such a meeting.

Sincerely,



Gilbert S. Grant
327-2904

Enclosure

Enclosure: Questions regarding MCB, CLNC Toxic waste Site Cleanups

1. Who is funding Toxic Waste Site (TWS) cleanups on CLNC? (EPA? USMC? other?)
 - a. What has been the level of funding since 1980?
 - b. What is the direction of funding in the future?
 - c. Year by year, do you think MCB has spent too much, too little, or just right?

2. What Authority has oversight responsibility for TWS cleanups at CLNC? (EPA? DOD? other?)
 - a. Does that Authority approve of the site cleanup remedy?
 - ? b. Does that Authority certify the cleanup?
 - c. Are CLNC sites on the National Priorities List?
 - d. Does MCB, CLNC give the public opportunity to comment on the preferred cleanup alternative?

3. What is the MCB level of effort directed toward TWS cleanups? (e.i. What is the organizational structure directly responsible for this matter?)
 - a. Environmental scientists? Technicians? Equipment? Other?
 - b. Experience level of those involved?

4. Does MCB rely on civilian contractors in these matters?
 - a. Site discovery and evaluation?
 - b. Evaluation of cleanup alternatives?
 - c. Implementation of remedial action?
 - d. Long term monitoring?

5. What methods has, and does, MCB use in site discovery? (Historical Aerial Photo analysis? Field trips by environmental staff personnel? other?)
 - ⓐ Has MCB done chemical testing of shellfish in waters near TWS to determine if mercury, lead or other metals or organochlorides are, in fact, entering the aquatic food chain?
 - b. Are TWS marked on the ground? How?

6. What procedures and systems are used for site evaluations?
 - a. Which sites require cleanup?
 - b. How much cleanup is necessary?
 - c. What cleanup technology can do the job?
 - d. Does MCB have ground water monitoring wells around the MCB Sanitary Landfill?

- ? 7. Generally, do cleanups address current risk, or speculative future risk?

8. Has MCB accomplished any TWS cleanups to date?
 - a. In each case, do you estimate the cleanups to be successful over the long run?
 - b. Is long term monitoring a part of the cleanups accomplished?
 - c. If cleanups have involved retrieving chemicals or land removal, what has been done with the offensive material?

9. For each toxic element the Marine Corps has used in the past, and still uses, what programs for toxic waste control does MCB have in effect? (e.g. motor oil, etc.)

a. Does MCB have directives covering all aspects of the toxic waste program?

Can copies be reviewed by the public?

10. What remedial actions does the MCB use? (Land disposal? Containment? Incineration? Reclamation? other?)

a. Does MCB have an approved Toxic Waste Landfill site on CLNC?

11. Is, or was, Agent Orange (dioxin) stored on CLNC? Where?

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MAY 04 1990

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