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CH:

To: HQ USMC

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

IN REPLY REFER TO

09.01-02/23/88-00516

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FXS
23 Feb 1988

MEMORANDUM FOR THE CHIEF OF STAFF, MARINE CORPS BASE

Via: AC/S, Facilities

Subj: NPL PUBLIC AFFAIRS PLAN

Encl: (1) NPL Press Packet

1. The enclosure is being distributed to all local media and contains the following:

Initial Press Release
Site History
Map of testing wells
Q's and A's concerning the Installation Restoration Program
Q's and A's with Colonel Dalzell
EPA list of abbreviations
Community Relations Plan

2. The AC/S, Facilities has reviewed and approved the enclosure.

Very respectfully,

S. W. WAGNER
Director, Public Affairs

SEND TO: MCAS CG, AT
LANT (Code 114)

Encl (2)

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022-87

NATIONAL PRIORITIES LIST

CAMP LEJEUNE, N.C.--As a result of a 1983 study program to identify, evaluate, control and correct past deficient waste disposal sites and practices involving ground water contamination here, the Environmental Protection Agency is likely to place Camp Lejeune on the National Priorities List (NPL) in late February.

The NPL establishes priorities for the EPA's use of Superfund monies to clean up hazardous waste sites in the United States.

Camp Lejeune uses and produces large quantities of hazardous materials and waste products. Although no hazardous waste is permanently stored aboard base, past hazardous waste disposal relied on burial.

This disposal method was acceptable at the time, but was subsequently found to potentially cause long-term problems through release of hazardous material into the soil and ground water.

Camp Lejeune realizes that the high amounts of hazardous material used aboard base presents the potential for damage to the environment, and vigorously pursues hazardous waste planning and training. The base has been recognized as a Model Installation, and will use the same commitment to excellence to deal with the ground water contamination, and will work with the EPA to clean the sites as rapidly as possible.

The initial steps to clean up the sites involve the Installation Restoration (IR) Program, a three-phase nationwide process to identify past hazardous waste sites and take necessary cleanup action.

The first phase is a Preliminary Assessment/Site Inspection (PA/SI), and was completed in April 1983 for Camp Lejeune. The study identified 76 potentially contaminated sites, and concluded that while none of the sites pose an immediate threat to human health or the environment, 22 sites warranted further investigation.

The area primarily under study at Camp Lejeune is the Hadnot Point industrial area. In 1985, traces of trichloroethylene, dichloroethylene and tetrachloroethylene were found in 8 of 35 wells in this area. The affected wells were immediately closed, and have remained closed since. No single contamination point has been identified as the source of contamination for the wells, and no contamination has been detected by periodic tests of drinking water aboard base.

The chemicals found are used primarily as solvents and degreasers.

Following the placement of Camp Lejeune on the NPL, the Base 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.

Within 180 days after completion of the RI/FS, Camp Lejeune must reach an agreement with EPA and state authorities for the completion of all necessary remedial actions at Camp Lejeune. Substantial continuous physical on-site remedial action must take place no later than 15 months after completion of the RI/FS.

Camp Lejeune continuously pursues a vigorous program of hazardous waste training, handling and management that includes annual courses of instruction for those dealing with hazardous waste. In addition, the base has minimized the use of hazardous materials by substituting non-hazardous substances for vehicle maintenance and parts cleaning.

The base has established a 24-hour Hotline for questions and comments concerning the National Priorities Listing. The number is 451-5100.

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SITE HISTORY

During the first phase of the Installation Restoration (formerly Naval Assessment Control of Installation Pollutants) program, eight potentially-contaminated sites were identified in the Hadnot Point industrial area, an area bounded by Holcomb Boulevard, Sneads Ferry Road, and the New River. Based on the available evidence, five of these sites were recommended for further study to confirm the existence of contamination. The Phase II effort commenced in April 1984 with the installation of 17 shallow monitoring wells in the Hadnot Point area and sampling of groundwater, surface water, soils and sediment. A preliminary report dated December 1984 showed benzene in Potable Well 602 at 380 part per billion.

Additional sampling by base and N.C. Division of Environmental Health personnel confirmed the benzene and detected T-1,2-dichloroethene and trichloroethene (TCE) in Well 602. TCE was also detected in Wells 601, 608, 634, 637, 651, 652, and 653, all of which were immediately shut down in January 1985.

Low concentrations of volatile organic compounds (VOC) were detected in some of the shallow monitoring wells during the 1984 sampling. With the exception of the benzene from Site 22, however, it did not appear that any identified sites could be the source of the VOC contamination. Subsequently, we conducted a site survey to locate other potential sources and investigated these further during a soil-gas survey.

The soil-gas survey identified several areas where TCE was detected and three buildings where concentrations in the vicinity exceeded 10 part per million: Buildings 1202, 1601, and 1709. A network of shallow wells (25-30' deep) was installed to confirm the soil-gas findings, including one at each contaminated potable well to determine if the well construction had contributed to the spread of contamination. These wells were sampled three times for VOCs.

Concurrent with the site survey/soil gas effort, each contaminated potable well was sampled. From the data, we can surmise that degradation of the TCE to lesser chlorinated compounds is occurring and that, from two years of pumping inactivity, significant contamination appears to be limited to Wells 602, 608, and 651.

From the shallow groundwater data, we have identified zones of contamination in the water table aquifer at two of the three buildings targeted by the soil-gas survey. Although the potable aquifer is described as semi-confined, neither U.S. Geological Survey nor our contractor have been able to locate an impervious layer separating it from the water table aquifer in the Hadnot Point area. The distribution of TCE in the water table aquifer is not areally extensive because it may be sinking up to several hundred feet and being picked up by the potable wells.

To test this hypothesis, we installed one 75-foot and one 150-foot well to form a cluster at each of the three buildings identified above. This work was completed in summer of 1987. At the conclusion of this effort, we obtained detailed data as a basis for the Draft Feasibility Report prepared by Naval Facilities Engineering Command, Atlantic Division and Environmental Science and Engineering Inc.

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Questions and Answers
Concerning the Installation Restoration (IR) Program

Q. What is the IR Program?

A. The IR Program is a DoD-wide environmental program to identify, assess, and control contamination from past hazardous waste disposal practices and spills.

Q. What are the goals of the program?

A. Program goals are to protect public health and the environment by cleaning up past hazardous waste disposal sites. Of specific concern is the threat of groundwater contamination and migration of pollutants. We comply with applicable laws and regulations while minimizing impacts on DoD's mission.

Q. What happened to NACIP?

A. From 1980 to early 1987, the Navy IR Program was called the NACIP (Navy Assessment and Control of Installation Pollutants) Program. As a result of the Superfund Amendments and Reauthorization Act (SARA), the program adopted RCRA/Superfund terminology. Navy terminology has been dropped.

Q. What is SARA?

A. SARA is the Superfund Amendments and Reauthorization Act of 1986. It amends CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act of 1980), which resulted in the original Superfund Program for cleanup of uncontrolled and abandoned sites, such as Love Canal. CERCLA is administered by the U. S. Environmental Protection Agency (EPA).

Q. Does CERCLA/SARA apply to the Navy?

A. Yes. CERCLA requires each department of the U. S. government to comply with the Act in the same manner and to the same extent, both procedurally and substantively, as any nongovernmental entity. In effect, Congress has waived sovereign immunity for DoD and other federal facilities with respect to this law.

Q. What does CERCLA, as amended by SARA, require?

A. The Act has many provisions, including the following requirements:

- EPA must establish a special Federal Agency Hazardous Waste Compliance Docket which contains information on hazardous waste sites at federal facilities. It must also establish a program to provide this information to the public.

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- O EPA must assure that a preliminary assessment is conducted for each facility on the docket and, where appropriate, evaluate such facilities for inclusion on the National Priorities List (NPL). The NPL is intended to call public attention to the worst sites in the nation. NAVFACENGCOM is ensuring that a preliminary assessment or its equivalent is done for each Navy facility on the docket.

- O Federal agencies must investigate NPL sites to determine feasible remedial measures in consultation with EPA and appropriate state authorities. The agencies must agree with EPA on plans and schedules for necessary cleanups.

- O For facilities not listed on the NPL, federal agencies must follow state laws concerning removal and remedial actions.

- O Federal agencies must consider the following factors in selecting remedial actions: the requirements of all applicable state/federal laws and regulations; a preference for treatment which reduces the volume, toxicity, and mobility of the hazardous contaminants; a preference against off-site transport and disposal; long-term uncertainties associated with land disposal; and potential threats to human health and the environment.

Q. Who is responsible for CERCLA compliance?

A. Under Executive Order 12088 (Federal Compliance with Pollution Control Standards) the head of each Executive agency is responsible for environmental compliance. DoD has delegated this responsiblity to each service. As a command function, environmental compliance is the responsibility of the Commanding Officer at the installation level.

Q. Who manages the IR Program?

A. The Office of the Deputy Assistant Secretary of Defense (Environment) manages the IR Program for DoD. The Chief of Naval Operations and the Commandant of the Marine Corps have directed NAVFACENGCOM to manage the Navy IR program funds and projects and to provide technical support to activities.

Q. How is the IR Program funded?

A. Since 1984, a central DoD transfer account called the Defense Environmental Restoration Account (DERA) has provided funds for eligible program activities. In FY87, we expect to spend approximately $45M in studies and cleanups. This money is managed by NAVFACENGCOM.

Q. What types of program activities are eligible for DERA funding?

A. Congress intended that DERA be focused on cleanup of past DoD hazardous waste disposal sites. The following types of activities are generally eligible for DERA funding within DoD and Navy guidelines and priorities:

- Immediate actions necessary to protect public health and safety when the hazard results from a release of hazardous substances from DoD property.
- Investigations to identify, confirm, and quantify contamination.
- Feasibility studies of remedial action (cleanup) alternatives.
- Remedial action plans and designs.
- Remedial (planned) or removal (quick response) actions.
- Long-term monitoring systems (capital costs and first two years of operating expenses).
- Research, development, and demonstrations necessary to prove cleanup technologies which offer permanent solutions.

Q. What are the public participation requirements of CERCLA?

A. CERCLA contains numerous provisions for public involvement in the IR Program, including the following major requirements:

- The installation must maintain an administrative record of documents on which we base the selection of a response action and make it available to the public at or near the facility at issue.
- Before a Commanding Officer approves any plan for remedial action, he must publish a notice and brief analysis of the proposed plan, make the plan available to the public, provide an opportunity for submission of written and oral comments, and provide an opportunity for a public meeting at or near the facility.
- The final plan must also made available to the public, and it must contain a response to each of the significant comments, criticisms, and new data submitted by the public.
- Appropriate state and local authorities, and a representative of the community involved, must be members of a technical review committee to review and comment on proposed actions with respect to releases of hazardous substances at Navy installations.

In 1986, CHINFO and CNO both published Public Affairs Guidance on Hazardous Waste Site Cleanup. The guidance calls for a proactive public information program for all Navy hazardous waste sites and a formal community relations plan for each installation that has a site listed on the National Priorities List.

Q. Who has the final say if EPA and/or a state does not agree with a cleanup remedy selected by the Navy?

A. For sites listed on the National Priorities List (NPL), CERCLA provides for selection of a remedial action by the Navy in consultation with the EPA or, if they are unable to reach agreement, selection by EPA. As a lead agency under the National Contingency Plan, the Navy has final decision authority for non-NPL sites on Navy installations. The Navy prepares an administrative record upon which it bases the selection of a remedial action. CERCLA requires a court to uphold a decision in selecting a remedial action unless an objecting party can demonstrate, on the basis of the administrative record, that the decision was "arbitrary and capricious" or otherwise not in accordance with law.

Q. Where can I find additional information on CERCLA/SARA and the DoD Installation Restoration Program?

A. Additional information is or will be available from the following sources:

- The text of CERCLA, as amended by SARA (Public Law 99-499, October 17, 1986).
- Executive Order 12580, Superfund Implementation, which delegates CERCLA responsibilities to various federal agencies, including EPA and DoD.
- The National Contingency Plan (NPL), found in the Code of Federal Regulations at Title 40, Part 300, implements CERCLA. EPA is currently revising the NCP to reflect the provisions of SARA. The revised NCP will contain a new section on federal facilities.
- The Federal Facilities CERCLA Compliance Manual, a 6-volume document which EPA is currently developing.
- A Navy IR Policy Manual which NAVFACENGCOM is developing for OPNAV.
- A series of NPL/Superfund/IR briefings which NAVFACENGCOM is giving at convenient Navy locations around the country.

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The overall coordinator for Camp Lejeune's placement on the National Priorities List will be Col. Thomas J. Dalzell, Assistant Chief of Staff, Facilities, Marine Corps Base. He recently answered some questions concerning NPL and the effects it might have on Camp Lejeune residents and workers.

Q. What is the National Priorities List?

a. Congress passed the Resource Conservation and Recovery Act back in the late 1970s, and that Resource Conservation and Recovery Act is our nation's hazardous waste management program. As part of that program, Congress requested that all the various activities within DoD and the federal government take a look at past hazardous waste dump sites and practices and initiate a plan to clean up these hazardous waste sites — especially where they impact on ground water contamination.

Q. Are there any hazardous waste sites aboard Camp Lejeune?

A. Yes there are. As a result of the Resource Conservation and Recovery Act the Navy developed what was called the NACIP program, and it was a program to go out and look at all Navy and Marine Corps installations and find out where past hazardous waste dump sites or any types of dumps were located. A study was done back in 1983 at Camp Lejeune, and from research of records, talking to people, and going out to look through the area, 77 old dump sites were identified here at Camp Lejeune. Of those 77 sites, 22 of them that were marked for further study, we have a number of sites right now, mainly in the Hadnot Point area where we have some test wells to monitor the amount of contamination and whether or not it's migrating through the ground.

Q. Is my health or the health of my family is any danger?

A. No it's not. All the wells which we get our raw water out of are continually tested and the wells that were identified as being contaminated have been closed off. All the other wells with water coming out contain no health problems at all to any individual who is living or working aboard Camp Lejeune or anyone in the local community.

Q. What about prior to 1983?

A. At that time we were not aware of any of these particular compounds that might have been in the ground water and we have no information that anyone's health was in any danger at that time.

Q. Could the contamination escape Camp Lejeune into Jacksonville?

A. Right now all the information we have is the contamination within the strata underground is contained, and we have no evidence of it migrating out into the local community. It's contained within Camp Lejeune.

Q. How do you test the drinking water?

A. Our drinking water is tested in accordance with the Safe Water Drinking Act. We do a bacteriological test on all of our water once a week, we do a heavy metal test once every three years, we do a volatile organic compound test once every three months, trihalomethane test once every three months and a radiological test every four years. All these tests are in accordance with federal and state regulations and meet those requirements.

Q. What are the chemicals found used for?

A. Most of the chemicals found mainly come from solvents, degreasers and other types of materials that we use in the maintenance and repair of vehicles aboard the base.

Q. What are the long term effects of exposure to these contaminants?

A. Heavy long term exposure to these chemicals could cause some health hazards, depending on the amount of chemicals ingested.

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Q. What precautions should we take?

A. The only precaution anybody here at Camp Lejeune needs to take is to ensure they only drink water that is coming through our approved water sources. Don't drink water out of streams; don't drink water raw water from a well site that somebody may have drilled around the area. These are the only precautions that individuals need to be aware of. At any time if an individual feels there's a different taste or a different odor or whatever in their drinking water, they need to contact us right away through the Joint Public Affairs Office at 451-5100 to let us know so that we can get an investigation going right away.

Q. How will we prevent this from happening again?

A. We have a number of procedures that are currently in effect that were mandated by the Environmental Protection Agency. All hazardous materials are accounted for aboard base. Hazardous waste is stringently controlled by federal and state EPA regulations, and all of it is taken off the base through the Defense Reutilization and Marketing Office and sold to private firms who handle and process the material. We are no longer dumping hazardous materials in sites like was done in the past. It's all handled in a very strict program that's monitored and inspected by federal and state EPA officials.

Q. How long will it take to clean up the wells?

A. That's a good question, but we really don't know how long it will take to get these cleaned up. As part of our remedial action we have to negotiate with the federal and the state EPA officials relative to the types of contamination that we have and the processes that we'll utilize to clean it up, and then the question comes up "How clean is clean?" and those are the things we have to work out. Some of these processes only take a few years, others may take a lifetime to clean.

Q. What was the source of contamination?

A. Most of the sources of contamination were the motor pools that existed down in the Hadnot Point area. At that time oils, greases, solvents, gasoline and cleaning fluids and other types of chemical compounds that were used in our everyday processes were just being dumped in the ground or dumped in sewers or thing like that; and we really were not aware back in the 60's and 70's of the effects on ground water contamination. Now we are more and more aware of of these things and have taken appropriate precautions to ensure the ground water contamination is not progressing any further.

Q. Is it likely that other sites on Camp Lejeune will be identified as NPL candidates?

a. The NPL listing applies to Camp Lejeune, and it's possible that other sites may show that we'll have to do some additional cleaning up. Once we go on the NPL listing, it involves all of Camp Lejeune and not a specific site on that.

Q. If there is no danger now, and the problem isn't serious, why is Camp Lejeune put on the list?

a. That's a good question, and as I mentioned the NPL listing is a priority listing the federal government comes up with to clean up those sites they consider to be the worst sites throughout the nation. Congress has authorized what we call a "Super Fund" act and those funds are for the clean up of hazardous waste sites. Without some method of prioritizing the hazardous waste sites the federal government would have no idea of the sites they should go and clean up first. So on some points of view, getting put on the NPL list brings the base to the forefront relative to public attention, but on the other hand, it becomes a help to us because we are eligible for the Super Fund money to enable us to get the clean up process started at a more timely manner.

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Q. If I'm concerned about this problem, who should I contact for more information?

a. If you have any concern whatsoever, or any additional information that you want concerning the extent of contamination or what we're planning on doing you should call the Joint Public Affairs Office, at 451-5100. Call them any time during the day or night and we'll get an answer back to you personally on that.

Q. When will the clean up begin?

a. The cleanup will probably not start for a while. We're currently in the second phase in the process of going through and looking at some remedial action that we can take. Then there's a certain time frame that we have to negotiate with the state of North Carolina relative to what procedures we are going to use and of course the time to get these cleanups will be dependent upon what the procedures we use and the availability of funding. I would anticipate sometime within the next two to three years some type of a process will be developed in which we'll start the clean up action. Right now we've just stopped using those wells we have put down monitor wells to monitor migration of any of the contaminates to ensure we are keeping it contained until such time as when we can get a clean-up process initiated.

Q. Will Camp Lejeune be in charge of clean-up or will state and federal EPA officials contract it out?

a. Camp Lejeune will be responsible for that. We will work through our engineers down at the Naval Facilities Engineering Command down in Norfolk, Virginia, and it will be in conjunction with the federal and state EPa. We have to work hand-in-hand. Some of the funding will come through the Navy, some will come through the Super Fund that's authorized by Congress.