

12.01-11/19/91-00049

(804) 445-1814

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1822:LAB:srw

15 NOV 1991

From: Commander, Atlantic Division, Naval Facilities
Engineering Command

To: Commander, U.S. Army Armament, Munitions, and Chemical
Command

Subj: CHEMICAL SURETY MATERIAL REMOVED FROM A DUMP SITE

Ref: (a) PHONCONS AMCCOM (Ms. Betty Peterson)/LANTNAVFACENGCOM
(Ms. Laurie Boucher) of 5, 6, and 8 Nov 91
(b) PHONCON USATEU (Mr. Goforth)/USATHAMA
(Mr. Jim Arnold)/OESO (Mr. Mike Kovalchick)/
MCB Camp Lejeune (Mr. Brynn Ashton)/
LANTNAVFACENGCOM (Ms. Laurie Boucher) of 7 Nov 91

1. This letter is sent to request confirmation and further clarification of certain pertinent information discussed during reference (a) concerning disposal of chemical surety material removed from past military disposal sites.

2. As we discussed, the Navy is administering the remedial investigation of the Rifle Range Chemical Dump (Site 69) located on MCB Camp Lejeune in North Carolina. This investigation is compliance driven, since MCB Camp Lejeune is on the National Priorities List (NPL). Historical information is sufficient to indicate the potential for chemical surety agents to exist buried at this site. Based on our recent telephone conversations with your Ms. Betty Peterson along with our conference call [reference (b)] with the U.S. Army Technical Escort Unit (TEU), the U.S. Army Toxic and Hazardous Materials Agency (USATHAMA), and the Navy Ordnance Environmental Support Office (OESO), we understand the following statements apply:

a. The U.S. Army Technical Escort Unit (TEU) is the group which traditionally provides support to the various Department of Defense (DoD) branches in the performance of site investigation and characterization work at locations potentially contaminated with chemical surety material.

b. If the TEU uncovers chemical surety material or suspect chemical surety material during a site characterization, the TEU is required to secure this material, i.e., the TEU cannot leave the chemical surety material in place.

c. Chemical surety material removed from a waste site is classified as a regulated hazardous waste.

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d. Presently, DoD chemical surety storage units do not have RCRA permits for storage of hazardous waste. Therefore, no locations are available to accept this chemical surety material.

e. On non-surety installations, the U.S. Army approaches remedial investigations at chemical surety sites using noninvasive field work only (geophysics, groundwater monitoring, etc.) until such time that the issue of disposal of such material is resolved.

3. Since the remedial investigation and hence cleanup of Site 69 is compliance driven, the Navy and Marine Corps must demonstrate to the Environmental Protection Agency (EPA) the present difficulties with conducting invasive field work at Site 69, one of which concerns the logistical aspects of securing chemical surety material. To support this, we require written response to the following:

a. Are comments 2a. through 2e. stated above accurate statements?

b. Please provide us a copy of the document which directs the TEU to remove any chemical surety material uncovered during such an investigation. Please indicate the applicable section.

c. Is there any way to safely contain and hold chemical surety material on-site until disposal? If so, please outline these requirements (technical, security, etc.)

d. Are all or just some of the chemical surety materials considered hazardous waste? Please provide a complete listing of those common chemical surety materials that are hazardous wastes along with the applicable EPA Hazardous Waste Identification Number.

c. Indicate what the Army is doing to resolve the issue of regulated storage of chemical surety material and the estimated timeframe for its resolution.

d. Please provide any other relevant information related to health and safety controls, site investigation guidelines, ultimate disposal technologies, etc.

4. Due to the timeframe imposed for remedial activities on an NPL site, we must inform EPA and the State of North Carolina of our plan of action for Site 69 no later than 1 December 1991. We, therefore, request your written response no later than 26 November 1991. We appreciate your continued support in the process of resolving how to approach sites containing chemical surety material in a safe and effective manner.

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5. Our point of contact is Ms. Laurie Boucher, P.E., at
(804) 445-1814.

P. A. RAKOWSKI
By direction

Copy to:

MCB Camp Lejeune (AC/S Environmental Management)
COMNAVFACENGCOM Code 18
NEESA (Attn: Mr. Thomas Flor, Code 112E2)
OESO (Attn: Mr. Mike Kovalchick, Code OE5)
USATHAMA (Attn: Mr. Jim Arnold)
U.S. EPA Region IV (Attn: Mr. Carl Froede)
N.C. DEHNR (Attn: Mr. Jack Butler)

Baker Environmental, Inc.
Attn: Mr. Ray Wattras

Blind copy to:

1822 (LAB)
1822 Admin. Record File
18S
LANTDIV Reading File
LABDOC:F:\ARMY1.LAB