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FEB 02 1987

From: Commanding General, Marine Corps Base, Camp Lejeune,
North Carolina
To: Commandant of the Marine Corps (Code LFL), Washington,
D.C. 20380

Subj: IN-PROGRESS REVIEW OF N.A.C.I.P. PROGRAM WITH STATE OF
NORTH CAROLINA OFFICIALS

Encl: (1) List of Attendees
(2) U.S. EPA ltr 4WD-RM dtd 18 Dec 86
(3) U.S.G.S. Project Report, April 1986-January 1987

1. We are forwarding the enclosures with a summary of discussions to keep you informed of Marine Corps Base and State agency relationships. Significant points of these discussions were:

a. Based on discussion by N.A.C.I.P. contractor of soil gas monitoring results near buildings 1710 and 1711, Marine Corps Base should investigate possible leaking underground storage tanks at this site.

b. Characterization Report for Hadnot Point Water Supply (HPWS) study area is to be published July 1987.

c. Feasibility Report of HPWS study area is expected in Fall 1987. (Note: N.A.C.I.P. response to contamination problems and completion of Feasibility Report at Marine Corps Base is progressing faster than similar responses by the private sector, per state CERCLA coordinator.)

d. Verification Step Report on remaining 20-plus sites will be completed summer 1988.

e. State agency cognizance over N.A.C.I.P. work at Camp Lejeune appears to lie with Hazardous Waste permitting staff, N.C. Solid and Hazardous Waste Management Branch, Department of Human Resources (unless Marine Corps Base site is listed on the National Priority List (NPL)).

f. If Marine Corps Base is listed on NPL, the CERCLA staff of N.C. Hazardous Waste Management Branch, vice Hazardous Waste permitting staff, will maintain cognizance.

g. N.C. Hazardous Waste permitting staff indicated the existing Part B Hazardous Waste storage permit would be modified to address corrective action requirement for inactive sites when EPA delegates authority for this to the state.

h. The Groundwater Section, N.C. Division of Environmental Management, Department of Natural Resources and Community Development, will compare N.A.C.I.P. results with state rules requiring restoration of groundwater to meet water quality standards.

i. EPA memo to State of North Carolina dated 18 December 86 (enclosure (2)) states:

(1) N.A.C.I.P. work at Camp Lejeune essentially satisfies corrective action requirements of the RCRA amendments (i.e., permits for inactive operations/sites).

(2) N.C. regulatory staff must work closely with N.A.C.I.P. staff and consultants.

j. U.S.G.S. Phase I study report is expected in March-April 1987 (enclosure (3)).

k. Water Supply VOC monitoring requirements will substantially increase in 1987 under pending N.C. rule changes per N.C. Water Supply Branch Head.

1. Construction of MILCON or other projects can be accomplished on or near N.A.C.I.P. sites pending completion of Characterization Step Report -- but requires thorough review with state officials of data collected to date, with an analysis of project effects on contaminant migration and possible commitment to continued post-project site monitoring.

2. State officials were pleased to have this exchange of data and the opportunity to comment on our plans in the early stages. All attendees agreed the N.A.C.I.P. project represents a reasonable and very detailed response to our contamination problems. Another meeting in mid-summer is planned as a means of presenting the Hadnot Point study results.

3. Our point of contact is Mr. Bob Alexander, Marine Corps Base Environmental Engineer, Autovon 484-3034.

T. J. DALZELL
By direction

Copy to:
LANTNAVFACENGCOM (Code 114)

Blind copy to:

SJA
BMO
PWO
NREAD
EnvEngr

Writer: Mr. Alexander, EnvEngr, FAC, X3034
Typist: M. Ballentine, 27 Jan 1987

CAMP LEJEUNE
 NAVY ASSESSMENT & CONTROL OF INSTALLATION POLLUTANTS
 21 JAN 87

NAME	REPRESENTING	PHONE
J. FRED HILL	NC DHS - Water Supply	756-1343
W. E. (WALLY) VERRICK	NC DHS. WATER SUPPLY	919-733-2321
MICHAEL BELL	NC DIV. OF HEALTH SERV. - Water Supply	756-1343
PERRY NELSON	N.C. DIV. ENV. MGMT.	919 733 3221
RICK SHIVER	N.C. D. E. M.	919 256-4161
BOB ALEXANDER	MCB FACILITIES DEPT	919-451-3034
Cherryl Barnett	Atlantic Division Naval Facilities Engineering Command	(804) 445-1814
BOB GREGORY	ENVIRONMENTAL SCIENCE & ENGINEERING (ESE)	(904) 332-3318
O. BRUCE LLOYD JR.	US Geological Survey Water Resources Division	(919) 856-4991
WANDA MEEKS	"	919-856-4510
DOUGLAS HARNED	"	919-856-4791
RONALD COBLE	"	"
MARY WHEAT	MCAS, NEW RIVER	919-451-6518
LEE CROSBY	NC DHR SOLID + HAZ WASTE	919 733-2301
James Carter	NC DHR Solid + Hazardous Waste	919/733-2178
Paul Layman	NC, DHR, Solid + Haz. Waste Manag.	919/733-2178
LT COL J. A. Wellington	OSJA, MCB	5177
ELIZABETH A. BETZ	NREAD, MCB	919/451-5977



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

DEC 18 1985

4WD-RM

Mr. William L. Meyer, Head
Solid and Hazardous Waste Management Branch
Department of Human Resources
Division of Health Services
306 North Wilmington Street
P.O. Box 2091
Raleigh, North Carolina 27602-2091

Dear Mr. Meyer:

The enclosed memo from Marcia Williams, Director of EPA's Office of Solid Waste explains the relationship between the Department of Defense (DOD) Installation Restoration Program (IRP) and EPA's Corrective Action Program under 3004(u) of the Hazardous and Solid Waste Amendments of 1984 (HSWA).

Our experience to date is that although there is a correlation between the various phases of an IRP and the various phases of a HSWA corrective action program under 3004(u), it requires close coordination with DOD and DOD's consultants for the IRP activities and outputs to fully satisfy the Corrective Action requirements under 3004(u).

Corrective Action activities to satisfy the requirements of 3004(u) of HSWA must include:

- 1) Identification of all solid waste management units (SWMU's) at a facility.
- 2) Identification of those SWMU's with known or suspected releases of hazardous wastes or hazardous constituents.
- 3) Determination of the nature and extent of releases of hazardous wastes or hazardous constituents that have occurred.
- 4) Development and implementation of corrective action measures for releases that have occurred, where appropriate.

If the reports and evaluations that have been developed under an IRP do not satisfy these four (4) basic requirements then the IRP must be modified or supplemented as appropriate to meet the Corrective Action requirements of HSWA.

Enclosure (2)

Although the four basic requirements noted above seem simple and straight forward, in actuality there are numerous complex questions that must be resolved.

In closing let me reiterate the importance of working closely with DOD and their consultants to see that DOD's ongoing Installation Restoration Program can be utilized to meet the requirements of Section 3004(u) of HSWA.

Sincerely yours,



James H. Scarbrough, P.E., Chief
Residuals Management Branch
Waste Management Division

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

WES

DEC 8 1986

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: The Department of Defense Installation
Restoration Program

FROM: Marcia E. Williams, Director *Marcia Williams*
Office of Solid Waste

TO: Waste Management Division Directors
Regions I - X

This memorandum discusses RCRA permits at facilities owned or operated by the Department of Defense (DOD). DOD has developed the Installation Restoration Program (IRP) to identify and clean-up hazardous waste sites. Under the IRP, DOD prepares studies and generates data that can assist EPA in drafting RCRA permits.

The IRP is carried out in stages that are comparable to the stages of a cleanup required by RCRA. Phase I of the IRP is intended to identify waste sites and is comparable to a RCRA Facility Assessment. A Phase I report should identify most, if not all, of the solid waste management units at a DOD facility. Phase II of the IRP characterizes the nature and extent of contamination at a site or unit. Phase II usually provides site characterization information and monitoring data and is comparable to a RCRA Facility Investigation. Phase III of the IRP is an R&D phase that is used where a site cannot be controlled with proven technology or where a site is suitable for evaluating new technologies. Although the permitting process has no R&D stage, Phase III of the IRP can be helpful in identifying new or unique corrective measures. Phase IV of the IRP develops and implements a remedial action plan. Phase IV is comparable to identifying and implementing corrective measures under RCRA.

EPA has placed a high priority on RCRA compliance at Federal facilities. The work performed under the IRP will provide you with much of the information you need to prepare a permit, and I urge you to incorporate the IRP process into the permit development process. This means that you need to work with the DOD installation in reviewing the results of each phase of the IRP process and when necessary, expand the scope of the IRP to include all solid waste management units at the facility.

Please keep in mind that we are developing a rule that will recognize priorities for corrective action at Federal facilities. After we promulgate the rule we will incorporate a facility's priority into the schedule of compliance under §3004(u) of RCRA. Until we prepare a final rule, permits should recognize that DOD can not address releases from every solid waste management unit at every facility simultaneously.

In sum, I urge you to use the IRP process when you implement the RCRA corrective action authorities under §3004(u). Thank you for your attention to this matter.

cc: RCRA Branch Chiefs
Regions I - X

INVESTIGATION NO. GC-084: An appraisal of the ground-water resources of Camp Lejeune Marine Corps Base, N.C.

PERIOD OF INVESTIGATION: 1986-89

INVESTIGATION CHIEF: Douglas A. Harned, U.S. Geological Survey, Box 2157, Raleigh, N.C., 27602, PHS 672-4791, 919-856-4791

COOPERATOR: Federal

OBJECTIVE: The objectives of this study are: to describe the ground-water resources of the base and environs and to construct an appropriate ground-water flow model that will be used to evaluate alternative ground-water use and management practices. This is a three-phased study: the first phase is examination of available data, the second phase is collection of additional data and construction of new observation wells, and the third phase is modelling.

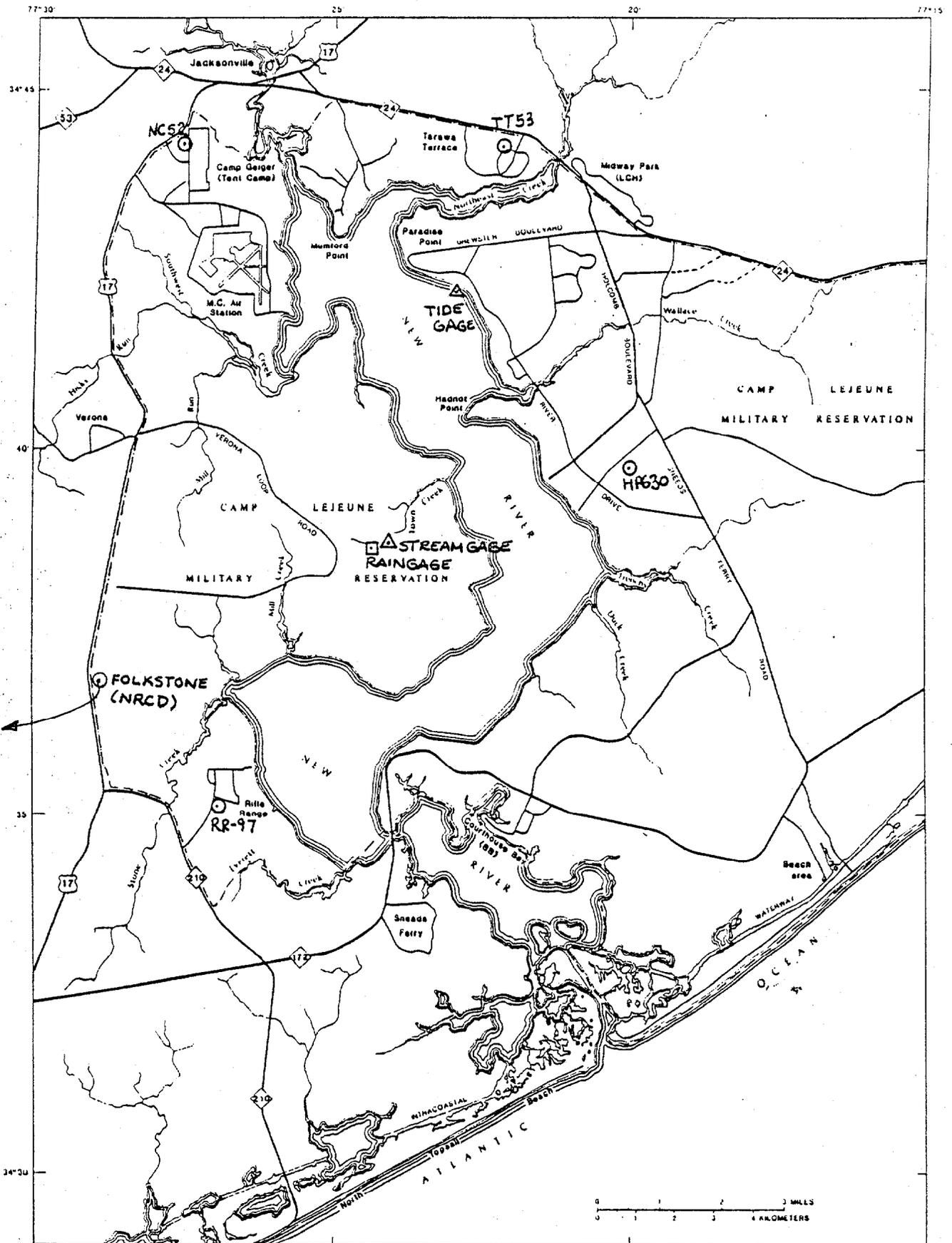
SIGNIFICANT FINDINGS AND PROGRESS: A stream-gauging station, and a rain gage were installed in the Town Creek basin to provide data on ground-water recharge. Water-level recorders were installed at 4P-030, IT-03, R3-97, and at the Folkstone NRCC site. Well drilling at the Camp Lejeune NRCC site began in September. Water-use and well-file data were obtained. A well inventory was made in preparation for the well logging and water-level surveys run in October. A tide gage and a barometer were installed. In the water level survey 7 wells were checked and water levels were obtained at 76 of those wells. Geophysical logs were run in November for the 16 open wells identified in the well survey. Data obtained from Camp Lejeune files on static water levels, pumping levels, and drawdown were entered into a SAS dataset.

PLANS FOR NEXT QUARTER: Continue examination of existing water use and well data. Install one additional water-level recorder. Analyze the water-level data and develop a preliminary water-level map. Establish elevations of the wells where water levels were obtained. Examine geophysical log data, and make a preliminary geohydrologic framework. Obtain geophysical logs of new observation wells being drilled by ESE. Make a second water-level survey in March. Write the annual project report.

REPORT STATUS: Data collection and analysis for the annual project report is underway.

PROJECT HIGHLIGHTS:

- A. Project stage: Phase I: review of existing data and preliminary description of the geohydrologic framework.
- B. Cooperator Contacts: Periodic contact with Mr. Price and Mack Frazelle of Utilities, periodic meetings with Bob Alexander of Facilities, and a meeting with Mike Seden of ESE.
- C. Changes affecting project elements: None.
- D. Problems associated with project: None.
- E. Hydrologic data released: Water level data for the NRCC Folkstone static and 16 Gamma-ray log copies sent to Rick Shiver of NRCC 1/16/87.



Locations of U.S. Geological Survey water-level recorders (Folkstone, RR-97, HP630, TT53, and NC52), stream gage, tide gage and rain gage.