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

in reply refer to:
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0 9 MAY 1988

From: Staff Judge Advocate, Marine Corps Base, Camp Lejeune
To: Assistant Chief of Staff, Facilities, Marine Corps Base,
Camp Lejeune

Subj: CAMP LEJEUNE INSTALLATION RESTORATION PROGRAM (IRP)

- 1. After LANTDIV representatives visited Camp Lejeune on 21 January 1988 to brief the Camp Lejeune IRP and CERCLA (SARA) requirements, the Base responded by taking swift action upon LANTDIV's recommendations. Your department drafted and staffed a proposed Base Order; the Director of Public Affairs drafted a public affairs plan to implement the public participation requirements of CERCLA; invitations were sent to various Federal, State and local officials requesting participation on the Technical Review Committee; and this Office provided guidance regarding the legal importance of the proper compilation of the CERCLA (SARA) administrative record. Captain Dougherty and Ms. Sue Jarman recently attended the CERCLA (SARA) seminar held at NAS, Norfolk. From NAVFACENGCOM's discussion of the four Department of the Navy NPL sites, the remedial process is extremely time and manpower intensive. It appears prudent to implement the following recommendations before EPA's announcement of Camp Lejeune's proposed NPL listing so the Base can "hit the deck running" to implement its CERCLA (SARA) duties.
- 2. To prevent the Base from losing its momentum in preparing for its imminent listing on the National Priorities List (which triggers specific time sensitive requirements), I recommend the following action:
 - a. Publish the proposed Base Order as soon as possible.

DONE

- b. Convene the Base Steering Committee to introduce the IRP and to identify the expected role of each steering committee representative. Additionally, the following should be included as agenda items and assigned to action officers:
 - (1) Identification of a project manager.
- (2) Identification of the Base Spokesman to represent Camp Lejeune at all Technical Review Committee meetings.
- (3) Preparation for the first Technical Review Committee meeting which should include preparation of an agenda, a briefing booklet, and perhaps a slide presentation.

(4) Identification (from the Camp Lejeune perspective) of the "Applicable or Relevant and Appropriate Requirements" (ARAR's).

M. R. MCCARTY
Deputy Staff Judge Advocate