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WILMINGTON REGIONAL OFFICE

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State of North Carolina
Department of Natural Resources and Community Development
Division of Environmental Management
512 North Salisbury Street • Raleigh, North Carolina 27611

James G. Martin, Governor
S. Thomas Rhodes, Secretary

R. Paul Wilms
Director

October 25, 1985

Mr. Larry Fitzpatrick
141 Brookview Court
Jacksonville, N.C. 28540

Dear Mr. Fitzpatrick:

The attached report on groundwater pollution at Camp Lejeune was prepared by Rick Shiver of our Wilmington Regional Office. I hope it will be helpful to you.

You may note that our recommendations regarding future investigations or corrective action are "requested" when normally they would be "required". This is because there is some question as to the extent of our authority to correct groundwater pollution on federal installations under the Water and Air Resources Act (GS 143). The Oil Pollution and Hazardous Substances Control Act seems clearly to exclude discharges due to negligence on federal property from our jurisdiction.

We are now in the process of requesting the Attorney General to address these questions and provide us with their opinion of our legal authority on these properties.

Central office groundwater staff are in agreement with Rick's conclusions and recommendations and are taking immediate steps to implement them.

Should you wish to be kept informed periodically on progress at Camp Lejeune, please give me a call at (919) 733-5083.

Sincerely,

Perry F. Nelson
Perry F. Nelson, Chief
Groundwater Section

PFN/tfa

Attachment:

cc: Paul Wilms
Chuck Wakild

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Pollution Prevention Pays

TABLE 1: A LIST OF SOURCES AT CAMP LEJEUNE THAT ARE OF CONCERN TO D.E.M.

| SITE NUMBER | SITE NAME | DESCRIPTION OF SOURCE | WASTE TYPE | SIZE (CAPACITIES) | QUANTITY (MAXIMUM) | DATES USED | HACIR PRIORITY SITE? |
|-------------|------------------------------------|---|--|-------------------|------------------------|-----------------------|----------------------|
| 1 | EDENH CO. ROSAL AREA | INTENTIONAL SPILLS | USED DRY ACID, POL "POL" IS PETROL-FUEL, OILS, AND LUBRICANTS) | 7 | 5000 GAL 20,000 GAL | LATE 1940s- MID 1970s | 15 |
| 2 | FORWARD DAY CARE CENTER | SLOPS, LEAKS, SPILLS | PESTICIDES | 1/4 | UK | 1945-1948 | 4 |
| 3 | ABANDONED CRISO-SOTE PLANT STORAGE | SLOPS, LEAKS, SPILL | CREOSOTE | 2 | UK | 1951-1952 | NO |
| 4 | LOTS 201 AND 203 STORAGE | SLOPS, LEAKS, SPILLS | PESTICIDES, TRANSFORMER OIL (CRO) | | UK | 1940s- PRESENT | 2 |
| 6 | LOTS 201 AND 203 STORAGE | LANDFILL | PESTICIDES | UK | UK | UK | YES |
| 6 | LOT 203 STORAGE | LANDFILL | SOLID WASTE | UK | UK | UK | NO |
| 7 | TARAWA TERRACE DUMP | LANDFILL | SOLID WASTE | 2 | UK | CLOSED IN 1972 | NO |
| 9 | FIRE FIGHTING TRAINING PIT | UNLINED SURFACE IN-ROUNDMENT (LINED LATE 60s) | USED OILS, SOLVENTS, CONTAMINATED FUELS | 1 | 30,000 GAL/YEAR | 1960s- PRESENT | 11 |
| 10 | ORIGINAL BASS DUMP | LANDFILL | SOLID WASTE | 10 | UK | PRE-1950 | NO |
| 11 | PEST CONTROL SHOP | SLOPS, SPILLS, LEAKS | PESTICIDES | 2 | UK | 1987- PRESENT | NO |
| 11 | PEST CONTROL SHOP | LANDFILL | LOW LEVEL RADWASTE | | 000000 | 1976-1987 | NO |

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TABLE 1: A LIST OF SOURCES AT CAMP LEJEUNE THAT ARE OF CONCERN TO D.E.M.

| ITE NUM- ER | SITE NAME | DESCRIPT- ION OF SOURCE | WASTE TYPE | SIZE (AC- RES) | QUAN- TITY (MAX- QTY) | DATES USED | HAZAR- DUS PRIORITY SITE? |
|-------------------|---|---------------------------------|---|----------------------|--------------------------------|------------------------|------------------------------------|
| 5 | MONTEGRO POINT DUMP | LADDELL | SOLID WASTE | 4 | UK | 1948- 1958 | NO |
| 6 | MONTEGRO POINT BURD DUMP | LADDELL | SOLID WASTE | 4 | UK | 1958- 1972 | 17 |
| 3 | WATKIN VILLAGE (E) SITS | LADDELL | SOLID WASTE | 1 | UK | 1976- 1978 | NO |
| 2 | NAVAL RE- SEARCH LAB - DUMP | LADDELL | SOLID WASTE LOW LEVEL RADWASTE | 3 | UK | 1956- 1960 | NO |
| 0 | NAVAL RE- SEARCH LAB INCINERAT- OR | UNDEVELOPED | BOTTOM ASH | 1/2 | UK | 1956- 1960 | NO |
| 1 | TRANSPORT- ED STORAGE LOT 140 | SLIPS, LEAKS, SPILLS | PESTICIDES | 4 | 1000 GAL | 1958- 1977 | 5 |
| 1 | TRANSPORT- ED STORAGE LOT 140 | SURFACE IMPROVEMENT- MENT | TRANSPORT- ED OIL (PCB) | | 11,000 GAL | 1950- 1951 | |
| 2 | INDUSTRIAL AREA TANK FARM | UNDER- GROUND LEAKS | GAS AND DIESEL FUEL | 4 | 50,000 GAL | 1940s- PRE- SENT | 18 |
| 4 | INDUSTRIAL FLY ASH DUMP | LADDELL | FLY ASH | 25 | 31,500 TONS | 1940s- 1980 | 12 |
| | INDUSTRIAL FLY ASH DUMP | LADDELL | SLUDGES FROM WTP AND STP | | UK | | |
| | INDUSTRIAL FLY ASH DUMP | INTENTIONAL SPILLS | VARIOUS ORGANICS, SOLVENTS, STRIKERS, VARNISHES, LACQUERS) | | 45,000 GAL | | |

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TABLE 1: A LIST OF SOURCES AT CAMP LEJEUNE THAT ARE OF CONCERN TO D.E.M.

| SITE NO. | NAME | DESCRIPTION OF SOURCE | WASTE TYPE | SIZE (CAC-RES) | QUANTITY (MAXIMUM) | DATES USED | PACIFIC PRIORITY SITE? |
|----------|---|-----------------------|--|----------------|-------------------------|----------------|------------------------|
| 5 | BASS INCINERATOR | LANDFILL ? | BOTTOM ASH | UK | UK | 1940-1960 | NO |
| 6 | COAL STORAGE AREA | STOCKPILE | STOCKPILE | 3 | UK | PRE-SENT | NO |
| 3 | HADNOT POINT BURN DUMP | LANDFILL | SOLID WASTE INDUSTRIAL WASTE | 23 | 370,000 YD ³ | 1946-1971 | 14 |
| 9 | BASS SANITARY LANDFILL | LANDFILL | SOLID WASTE | 30 | UK | 1972- PRE-SENT | NO |
| 0 | SPREADS BY ROAD - FUEL TANK SLUDGE AREA | LANDFILL | GASOLINE TANK BOTTOM SLUDGE | UK | 600 GAL | 1970 | 20 |
| 5 | CAMP GEIGER AREA FUEL FURNACE | UNDERGROUND | FUELS | 1/10 | UK | 1957-1958 | 22 |
| 6 | CAMP GEIGER AREA DUMP | LANDFILL | SOLID WASTE | 1/2 | UK | LATE 1950s | 21 |
| | CAMP GEIGER AREA DUMP | | WASTE OIL | | 25,000 GAL | 1960s | |
| | CAMP GEIGER AREA DUMP | | SOLVENTS | | 15,000 GAL | | |
| 7 | CAMP GEIGER AREA OPEN DUMP | OPEN DUMP | SOLID WASTE | 4 | UK | 1950-1951 | NO |
| | CAMP GEIGER AREA DUMP | LANDFILL | SOLID WASTE INDUSTRIAL WASTE, POLYMER, SOLVENTS, PESTICIDES, ORDNANCE, BATTERIES | 30 | 110,000 YD ³ | 1946-1970 | 6 |

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TABLE 1: A LIST OF SOURCES AT CAMR
LEJEUNE THAT ARE OF CONCERN
TO D.E.M.

| SITE NO/ID- ID | SITE NAME | DESCRIPT- ION OF SOURCE | WASTE TYPE | SIZE (AC- RES) | QUAN- TITY (MAXI- MUM) | DATE USED | HAZAR- DUS PRIOR- ITY SITE? |
|----------------------|---|--|--|----------------------|---------------------------------|--------------------------------|---|
| 45 | CAMPBELL STREET AV- GAS - JP FUEL FARM | UNDER- GROUND LEAKS | AVGAS AND JP FUEL | 3 | 100,000 GAL | 1978 | 13 |
| 48 | MCAS NEW RIVER TER- CITY DUMP | INTENTION- AL SPILLS | SILICENT- AL TER- CITY | 1/2 | 1000 LBS | 1956- 1966 | 3 |
| 52 | MCAS DIRECT REFUEL DE- POT | UNDER- GROUND LEAKS | AVGAS AND JP FUEL | 3 | UK | 1971 | NO |
| 53 | MCAS WARE- HOUSE BLDG 3525 AREA AND ROAD- WAYS | INTENTION- AL SPILLS (DUST CON- TROL) | WASTE OIL, JP FUEL, PAINT THIN- NER | 3 MILES | UK | 1970- 1975 | NO |
| 54 | CRASH CRSC FIRE TRAIL- ING BURN PIT | UNLINED SURFACE IMPROVED- MENT (UN- ID 1975) | WASTE OILS, FUELS SOLVENTS | 1 1/2 | 500,000 GAL | MID- 1950s- PRE- SENT | 19 |
| 64 | MARINES ROAD- SPREADS ETR BY ROAD MORGAN SPILL | UNIDENT- IFIED SPILL | MORGAN | 1 | UK | 1975 | NO |
| 66 | AMTRAC LOADING SITE AND STORAGE AREA | INTENTION- AL SPILLS | OIL, POL, BATTERY ACID | UK | UK | 1950s- PRE- SENT | NO |
| 68 | RIFLE RANGE DUMP | LADRELL | SOLID WASTE SOLVENTS | 4 | 50,000 YD ³ | 1942- 1972 | 16 |

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TABLE 1: A LIST OF SOURCES AT CAMP LEJEUNE THAT ARE OF CONCERN TO D.E.M.

| ITE NUMB- ER | SITE | DATE | DESCRIPT- ION OF SOURCE | WASTE TYPE | SIZE (AC- RES) | QUAN- TITY (MAXI- MUM) | DATES USED | HAZAR- DOUS SITE? |
|--------------------|--|------|-------------------------------|--|----------------------|---------------------------------|-------------------------|-------------------------|
| 69 | RIEL'S RACCS | | LANDFILL | CHEMICAL WASTES, PESTICIDES, PCB, SOL- VENTS | 6 | 93,000 YD ³ | 1950- 1976 | 1 |
| 73 | COURTHOUSE BAY LIQUID DISPOSAL AREA | | INTENTIONAL SPILLS | BATTERY ACID | 13 | 400,000 GAL 20,000 GAL | 1946- 1977 | 10 |
| 74 | MESS HALL GREASE PIT AREA | | LANDFILL | PESTICIDES, PCB, (TRANS- FORMED OIL) | 1/10 | 20, DRUMS | EARLY 1950s- 1963 | 7 |
| 15 | MCAS BASK- ET BALL COURT SITE | | LANDFILL | "CN" GAS IN SOLUTION CCHLORO- ACETOPHE- NONE, VARI- OUS SOL- VENTS | 1/10 | 100 DRUMS | | 8 |
| 16 | MCAS CURT- IS ROAD SITE | | LANDFILL | "CN" GAS IN SOLUT- ION, VARI- OUS SOL- VENTS | 1/4 | 100 DRUMS | 1949 | 9 |

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