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HEADQUARTERS, MARINE CORPS BASE, CAMP LEJEUNE

ACTION BRIEF

Date: MAR 15 1988

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Staff Section: Utilities Branch
Base Maintenance Division
Facilities Department

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Subj: ENVIRONMENTAL CONCERNS OF UTILITIES BRANCH, BASE
MAINTENANCE DIVISION

Problem: Clarification of Environmental Responsibility

Background: The water and wastewater plants aboard Camp Lejeune and MCAS, New River are experiencing numerous environmental related problems, including violations of permits issued by the State of North Carolina. These environmental concerns involve: operation of utility plants, monitoring of effluents from wastewater treatment plants, maintenance and repair of facilities, and expansion of utility systems throughout the service areas.

Currently, the Utilities Branch is responsible for operation of utility plants in compliance with environmental permit parameters and determining required facility improvements and expansions.. NREAD is performing compliance monitoring, and the Environmental Engineer in the AC/S, Facilities office is intermittently involved with permit actions. The major problems in the environmental arena as seen from an Utilities Branch perspective are: (1) Confusion exists regarding which organization or person is responsible for acting on environmental issues, implementing environmental policies and programs, and resolving environmental problems; (2) No single point of contact is available for consultation with State and Federal agencies; (3) Confusion exists among Base activities and State and Federal Agencies regarding who to talk to on various environmental concerns; and (4) NREAD and the Base Environmental Engineer have differing priorities, concerns, and duties which results in lack of coordination and fragmentation of the Base's environmental program.

Discussion: In order to prevent potential problems, negative publicity, and a need to maintain good working relationships with State and Federal authorities, the Utilities Branch has been handling environmental issues without authority or manpower to properly do so. One example pertains to the permit to discharge into New River from the Camp Geiger Wastewater Treatment Plant. The new permit was issued on 18 February 1988, to be effective on 1 March 1988. Since the effective date, the permit is continually being violated due to new effluent ammonia limits. Weekly notice of violations are being sent to the appropriate State authorities. The Utilities Branch was notified of the new permit approximately 10 days after receipt, which did not allow adequate response time to prevent violation. To prevent additional problems, Utilities

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and NREAD representatives met with the NC Department of Environment Management representatives to inform them of intended corrective actions. If permit violations continue and a major consequence results, such as a fish kill, punitive fines may be imposed and certified operators at utility plants may lose their licenses to operate water and wastewater treatment facilities.

Following is a condensed list of outstanding environmental concerns that require review and action:

- (1) Permit violation of BOD limit at Camp Johnson Wastewater Treatment Plant.
- (2) Permit violation of ammonia limit at Camp Geiger Wastewater Treatment Plants.
- (3) Permit violation of fecal coliform limit at Hadnot Point Wastewater Treatment Plant.
- (4) Permit violation for effluent toxicity at Hadnot Point, Tarawa Terrace, Camp Johnson, and Camp Geiger Wastewater Treatment Plants.
- (5) Relocation of Onslow Beach Wastewater Treatment Plant outfall.
- (6) Inability to enlarge Courthouse Bay Wastewater Treatment Plant to meet projected demand.
- (7) Elimination of discharge into New River below Sneads Ferry Bridge.
- (8) Increased trihalomethane concentration in potable water at MCAS, New River, and Camp Geiger.
- (9) Public notification of lead and other heavy metals in drinking water.
- (10) Requirements for industrial sewage treatment facility.
- (11) Revision of air quality regulations.
- (12) Compliance with U.S.E.P.A. wastewater monitoring requirements.
- (13) Reactivation of secured water wells.

These concerns involve one or more Departments or Divisions on Base including AC/S, Facilities, Base Maintenance, NREAD, and Public Works regarding master planning, MCON Program, contract

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designs, utility operations, environmental monitoring and consultation with State and Federal agencies. Currently, there is a lack of coordination and continuity in the environmental program and organizations or persons tasked with the responsibility of handling environmental issues, not performing their duties.

Recommendations:

Conduct a meeting with representatives from AC/S, Facilities, NREAD, Base Maintenance and Public Works to discuss environmental policy and clarify responsibilities and authority of organizations and positions affected.



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