



UNITED STATES MARINE CORPS

MARINE CORPS BASE
PSC BOX 20004
CAMP LEJEUNE, NORTH CAROLINA 28542-0004

IN REPLY REFER TO:
5090.10
BEMD

DEC 07 2006

Ms. Gena Townsend
Remedial Project Manager
US Environmental Protection Agency Region IV
Atlanta Federal Center
Waste Management Division
Federal Facilities Branch
61 Forsyth Street SW
Atlanta, Georgia 30303

Dear Ms. Townsend:

The Interim Record of Decision (IROD) for Site 69, Rifle Range Chemical Dump, requires annual reporting on the status of the buried Chemical Warfare Material (CWM) at the site. The Environmental Protection Agency (EPA) in their concurrence letter for the Site 69 IROD asked for the Base to contact the U.S. Army on an annual basis until work at this CWM site has commenced.

In November 2002, the Base completed a survey for the Project Manager for Non-Stockpiled Chemical Material, a Center tasked with providing management and direction to the Department of Defense for the disposal of non-stockpiled chemical material. This survey included the known CWM at Site 69 and the suspect CWM at sites 41, 74, 75, and 76.

Based on site-specific determinations, current technological limitations, stakeholder input, and the EPA's "Programmatic Environmental Impact Statement (PEIS): Destruction of Non-Stockpile Chemical Warfare Materiel Containing Chemical Agent" (Federal Register: October 18, 1996 (Volume 61, Number 203)), leaving the buried CWM in the ground may be preferable to excavation and destruction. The Installation Restoration Program Partnering Team for Marine Corps Base (MCB), Camp Lejeune have agreed that leaving any potential CWM buried is recommended based on the above mentioned screening criteria.

Similarly, the CWM Project Manager of the U.S. Army Corps of Engineers (USACE) supports this course of action through a memorandum to the Commanding General for MCB, Camp Lejeune dated February 14, 2005. The memorandum states, "Leaving the CWM in

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the ground while controlling access to the site and containing potential contamination is an acceptable alternative course of action." In their latest response to the Base, the USACE stated that the U.S. Army Chemical Materials Agency is operating a single Rapid Response System (RSS) to address CWM at DOD stockpile facilities. However, this technology to date has been utilized at large stockpile facilities only. The USACE recommends that if land-use changes or stakeholder concurrence changes, reconsideration of the above alternative is recommended.

If you require additional information or have any questions, the point of contact for this matter is Mr. Robert Lowder, Environmental Quality Branch, Environmental Management Division, Installations and Environment Department, at 910-451-9607.

Sincerely,



SCOTT A. BREWER, PE
Director, Environmental Management
By direction of
the Commanding Officer

Copy to:
NAVFACENGCOM (Mr. Hood Code OPCEV) ✓