Doc. No.: CLEJ-00231-1.02-08/09/89

89-B-2611
PWO
AUG 9 - 1989

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commandant of the Marine Corps (Code LFF-2, Ben Bond)

Subj: CONSTRUCTION CONTRACT 89-B-2611, TEMPORARY FUEL FARM

Encl: (1) Justification and Background Data on Temporary Fuel Farm

1. As previously requested, background data/justification to fund the subject contract utilizing M2 funds is provided as the enclosure.

2. Point of contact is Mr. F. E. Cone, telephone AV 484-2213.

T. L. HUGUELET
By direction

Drafter: F. Cone, X2213
Typist: J. Peterson, 8Aug89

29 Palms

DOC NO: CLEJ-00231-1.02-8/9/84

CAMP LEJEUNE FUEL FARM

Background: The Camp Lejeune Fuel Farm was originally constructed in 1943 (currently 46 years old). The fuel farm consists of 17 tanks ranging in size from 3,000 gallons to 600,000 gallons. The majority of the tanks are in the 12,000 to 15,000 gallon range. The fuel farm also includes an outdated, congested refueling area and dispatch building. Unloading facilities are considered inadequate. Fuel leaks have been detected and repaired (to the extent possible) on several occasions over the years. A recent study by O'Brien and Gere (consulting firm) of the ground water in the area (excerpts included as attachment (1)) indicates significant amounts of free fuel are located under the fuel farm. Further, several potable water wells in the fuel farm area have been shut down due to the detection of benzene and other chemicals in the water.

Past Action: During the early 1980s, several actions were taken in an attempt to correct problems associated with the fuel farm. A condition survey (attachment (2)) indicated significant discrepancies with the existing tanks and piping. Further, HQMC Projects LE201M and LE433R (attachments (3) and (4)) were initiated to test and correct specific discrepancies. During design of Project LE201M, it was discovered that the cost to replace valves (necessary to isolate the tanks to allow leakage testing and inspection) would cost between $300,000 and $500,000. Because of the age of the tanks (+40 years), a decision was made that the fuel farm was beyond its expected life and that expenditures of $500,000 to merely determine the condition of the 40-year old tanks and piping would be wasteful. A decision was made to cancel major repairs to the fuel farm and to submit under the Military Construction Program to obtain a new fuel farm at a new location.

Current Status: The O'Brien and Gere study indicates significant leakage from the underground storage tanks and piping. Upon receipt of this study, the following actions were taken:

a. Notification to the State of North Carolina required by regulation, including notice that the fuel farm would be immediately shutdown (attachment (5)).

b. Notification to LANTDIV to proceed with design of clean-up and closure plan.

c. Design of a temporary fuel farm adjacent to the existing fuel farm until funding and completion of the future MILCON project. The fuel farm is currently still in operation. A compliance order is expected in the near future from the State of North Carolina regarding the fuel farm. Design of the temporary fuel farm as an interim fix is completed. Additional data regarding the fuel farm is provided as attachment (6). To date, funding has not been provided for the project.

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Requested Action: Request M2 funding in the amount of $332,000 to allow advertisement and award of the interim fuel farm as a major repair project. The following data is provided as justification.

a. The site for the interim fuel farm is directly adjacent to the existing fuel farm.

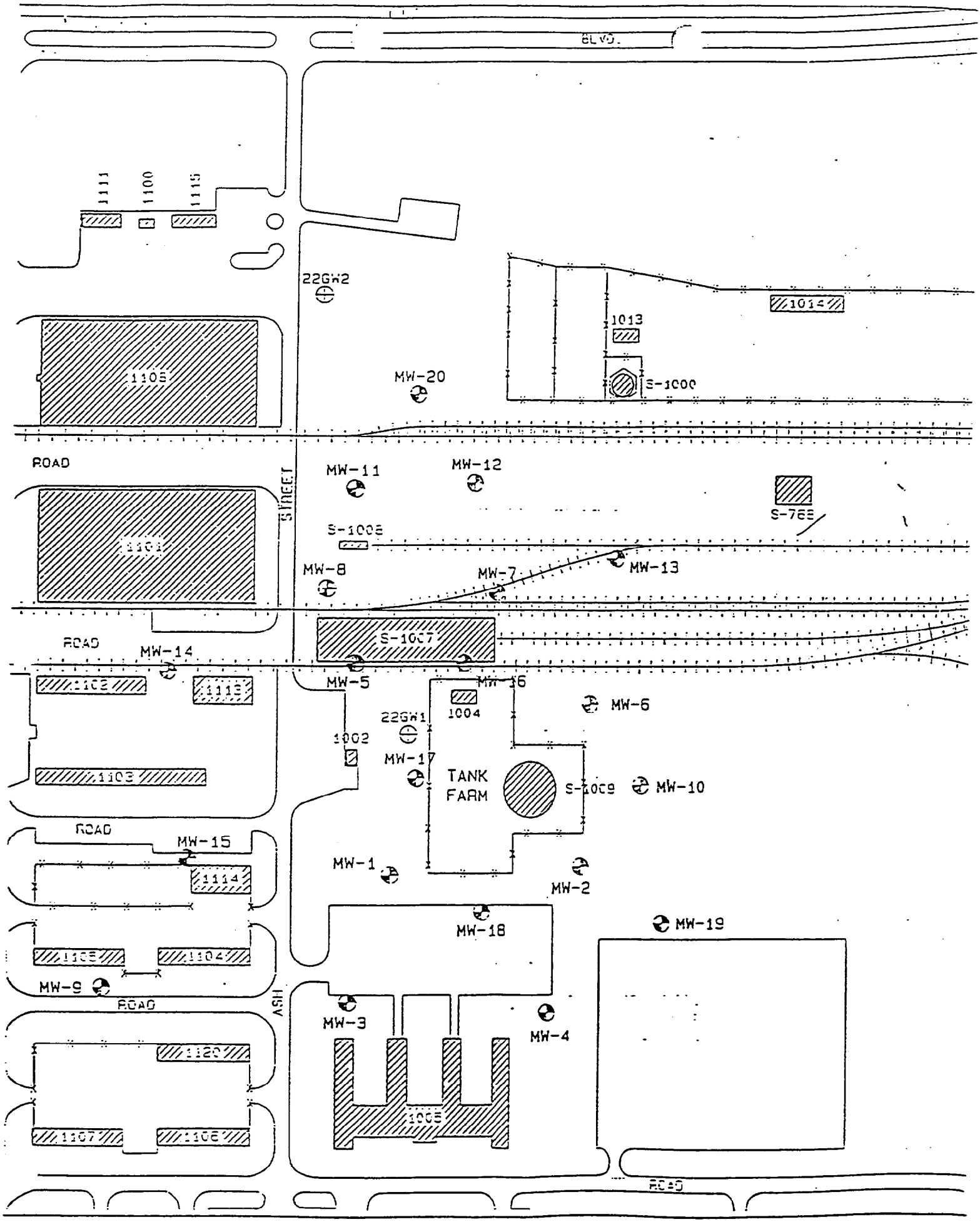
b. As noted previously, a cost of approximately $500,000 would be incurred in accomplishing minimal repairs necessary to test and inspect sections of the existing fuel farm.

c. Repairs of the existing fuel farm would likely run in the $2 to 3 million range.

d. No circumstances are envisioned where repairs on the existing fuel farm could be accomplished for less than the $332,000 projected for the interim facility.

e. Although not a pure repair project in terms of in-kind replacement, we feel interim replacement of the fuel facilities by use of repair dollars is a reasonable and logical approach to an urgent need.

f. The interim fuel farm will likely remain a permanent or semi-permanent fuel dispensing facility.



Attachment 1

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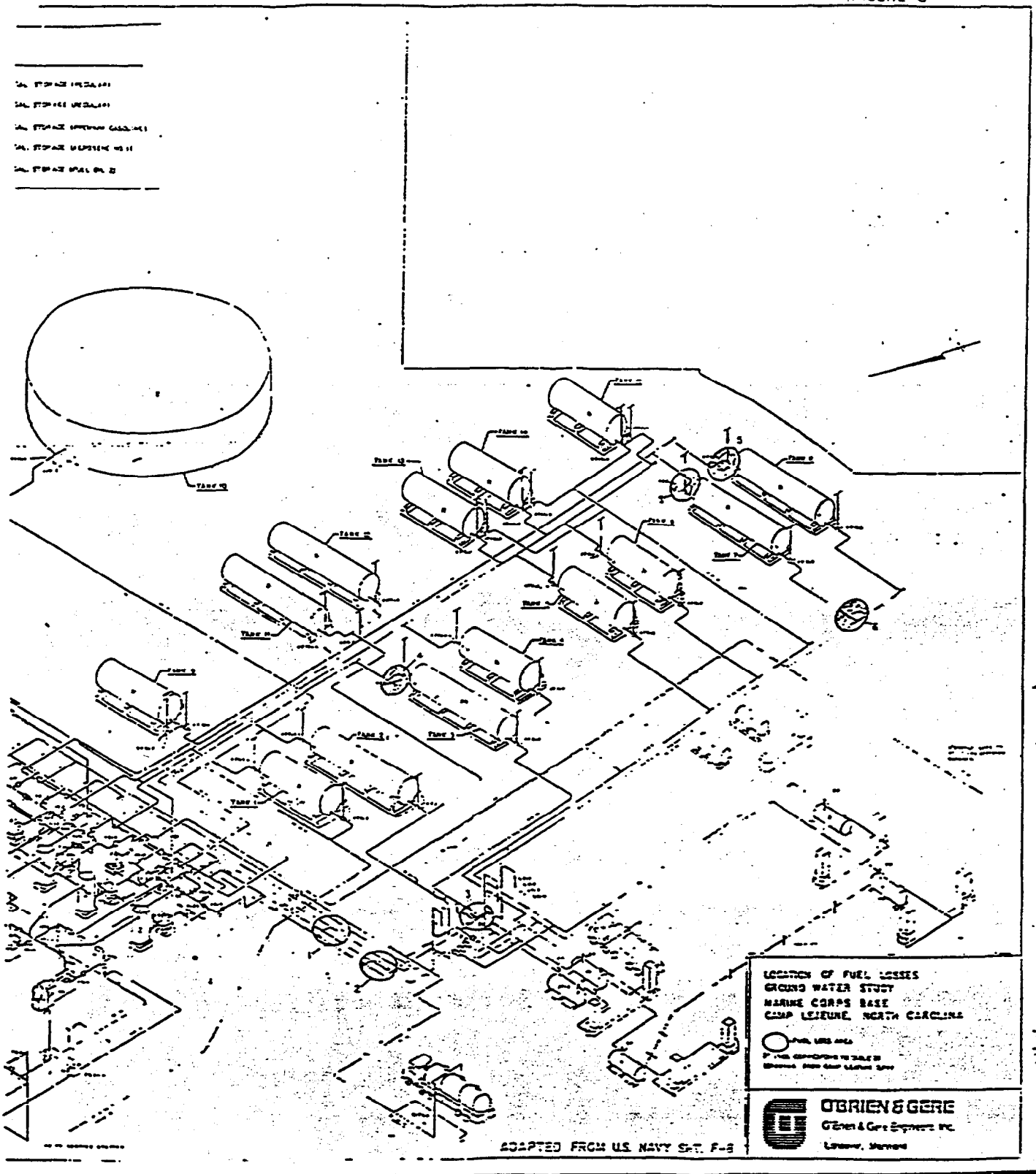
FIGURE 3



Doc No: OLEJ-00231-1.05-8/9/89

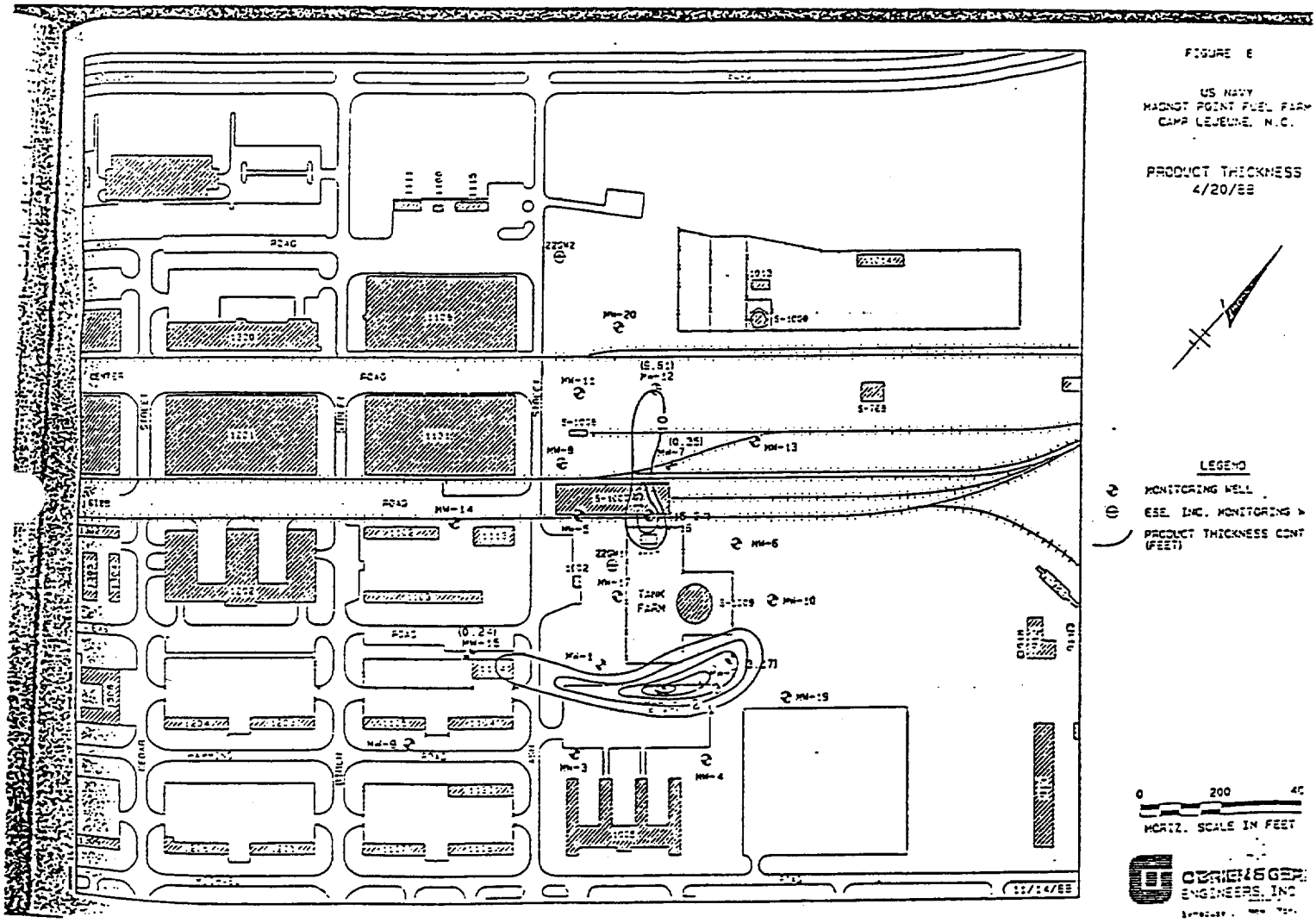


FIGURE 8

US NAVY
MAGNET POINT FUEL FARM
CAMP LEJEUNE, N.C.

PRODUCT THICKNESS
4/20/88

LEGEND

MONITORING WELL

ESE, INC. MONITORING W

PRODUCT THICKNESS CONT (FEET)

0 200 40

HORIZ. SCALE IN FEET

ENGINEERS, INC

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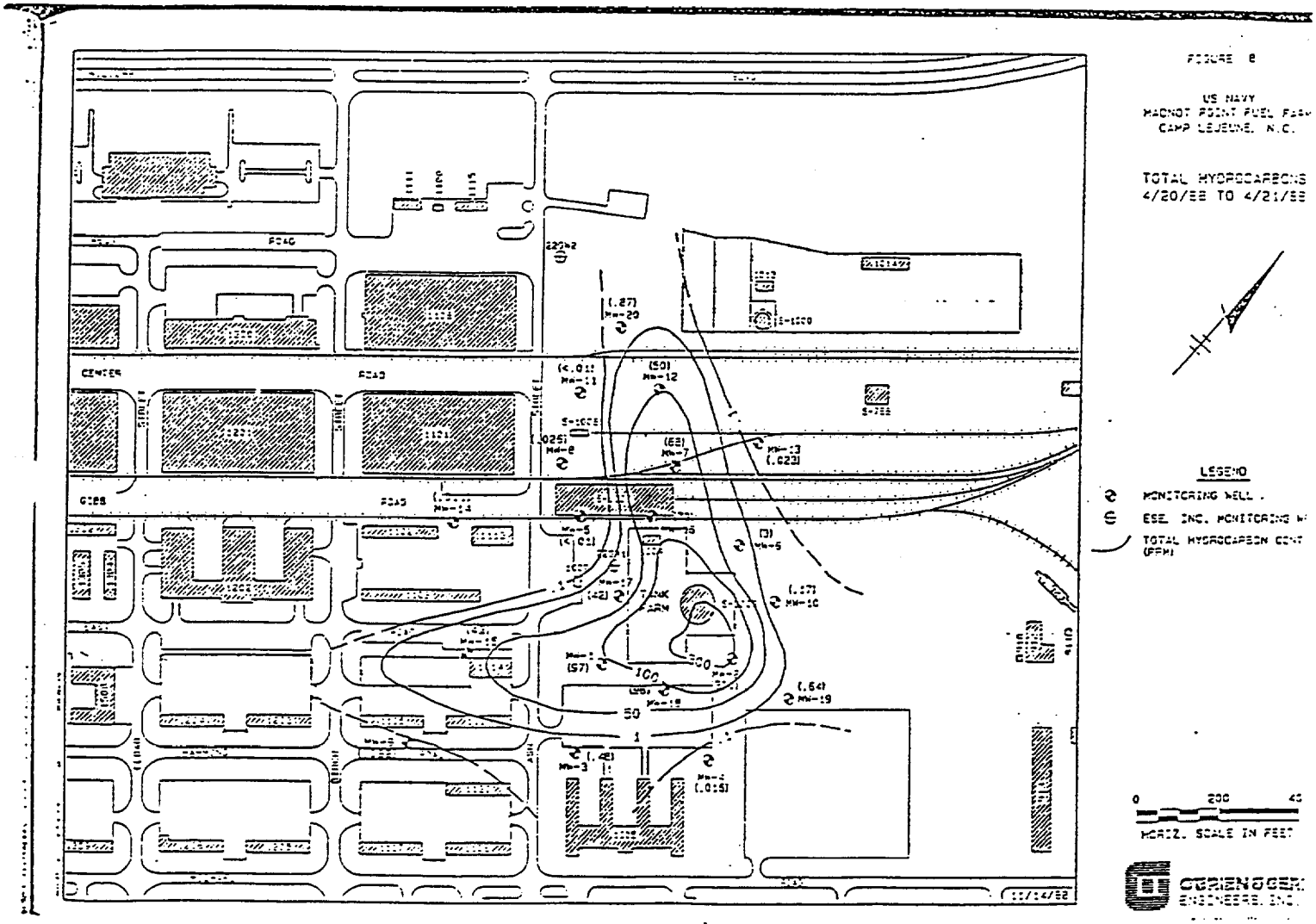

DRAFT

GROUND WATER ELEVATIONS AND PRODUCT THICKNESS MEASUREMENTS
HADNOT POINT TANK FARM
CAMP LEJEUNE, NC

WELL NUMBER	GROUND ELEV.	CASING ELEV.	3/15/88 GROUND WATER ELEV.	3/15/88 PRODUCT THICKNESS	4/20/88 GROUND WATER ELEV.	4/20/88 PRODUCT THICKNESS
MW-1	28.3	30.00	19.38	--	19.41	--
MW-2	30.0	31.68	15.97	2.97	15.93	3.17
MW-3	29.0	29.23	19.72	--	19.83	--
MW-4	29.8	31.61	21.69	--	21.73	--
MW-5	28.5	28.54	21.45	--	21.25	--
MW-6	27.8	29.95	19.26	--	19.20	--
MW-7	27.7	27.68	N/A	N/A	20.25	0.35
MW-8	26.6	26.35	20.12	--	20.18	--
MW-9	28.8	30.73	18.78	--	18.75	--
MW-10	28.1	28.01	18.26	--	18.42	--
MW-11	26.5	28.52	19.49	--	18.63	--
MW-12	26.9	28.62	16.92	4.33	11.32	9.81
MW-13	28.8	30.56	20.94	--	20.87	--
MW-14	27.7	27.87	19.72	--	20.05	--
MW-15	28.3	30.13	19.52	0.86	19.51	0.24
MW-16	28.4	30.33	6.49	14.85	6.16	15.34
MW-17	29.5	31.70	19.25	--	18.97	--
MW-18	29.9	31.80	14.92	4.59	14.68	5.10
MW-19	29.4	31.99	18.72	--	18.45	--
MW-20	26.8	31.01	20.84	--	19.65	--

N/A = DATA NOT AVAILABLE
-- = NO PRODUCT LAYER DETECTED

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Table 5
Ground Water Sample Analysis
Hadnot Point Fuel Farm
Camp Lejeune, NC

Well No.	Date	BEN (ppb)	TOL (ppb)	EBEN (ppb)	XYL (ppb)	TCE (ppb)	PERC (ppb)	MTBE (ppb)	THC (ppb)
MW-1	4/20/88	19000	36000	3200	21000	<1000	<1000	<10000	97000
MW-2	4/21/88	29000	110000	11000	48000	<1000	<1000	<10000	300000
MW-3	4/20/88	<1	2	<1	4	<1	4	<10	480
MW-4	4/20/88	<1	<1	<1	2	<1	<1	<10	16
MW-5	4/20/88	<1	1	<1	2	<1	<1	<10	<10
MW-6	4/20/88	600	1700	1600	7100	<100	<100	<1000	13000
MW-7	4/21/88	28000	26000	2800	12000	<1000	<1000	<10000	68000
MW-8	4/20/88	19	1	<1	<1	<1	<1	<10	26
MW-9	4/20/88	<1	<1	2	8	<1	<1	<10	92
MW-10	4/20/88	51	1	9	14	<1	<1	<10	170
MW-11	4/20/88	1	1	<1	1	<1	<1	<10	<10
MW-12	4/21/88	19000	17000	1500	8400	<1000	<1000	<10000	50000
MW-13	4/20/88	2	2	2	8	<1	<1	<10	23
MW-14	4/20/88	6	<1	<1	2	<1	<1	<10	11
MW-15	4/21/88	4700	18000	2400	13000	<1000	<1000	<10000	43000
MW-16	4/21/88	28000	28000	1900	12000	<1000	<1000	<10000	79000
MW-17	4/21/88	11000	13000	2500	9100	<100	<100	2800	42000
MW-18	4/21/88	24000	42000	1900	12000	<1000	<1000	<10000	96000
MW-19	4/21/88	21	150	53	130	<1	<1	<10	640
MW-20	4/21/88	60	160	79	96	1	<1	<10	870

LEGEND: BEN - Benzene
TOL - Toluene
EBEN - Ethylbenzene
XYL - Xylenes
TCE - Trichloroethene
PERC - Tetrachloroethene
MTBE - MTBE
THC - Total Hydrocarbons

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Table 4

Product Sample Analsis
Hadnot Point Fuel Farm
Camp Lejeune, NC

Well Number	Product Identification
MW-2	Gasoline
MW-7	Gasoline
MW-12	Gasoline
MW-16	Gasoline
MW-18	Gasoline

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CONDITION SURVEY
POL FACILITIES
CAMP LEJEUNE, NORTH CAROLINA
27 June 1980

1. INTRODUCTION

Mr. Dal J. Ingram, Petroleum Engineering Consultant, Naval Facilities Engineering Command, carried out a comprehensive physical condition survey of the POL facilities at Camp Lejeune and Marine Corps Air Station, North Carolina from 10-12 June 1980. Station personnel contacted during the visit were as follows:

Lcdr J.T. Sherron	Assistant Public Works Officer
T.R. Rankins	Head, Mechanical Branch, Public Works
David S. Batchelor	Fuels Supervisor [illegible]
E.H. Howell	Fuels Supervisor, Air Station
Rufus Carter	Base Motor Transport
Maj J.N. Newman	OIC, DSSC
J.M. Luchsinger	Fuels Division, Air Station
Ronald H. Waters	OIC Shop Stores
J.D. Friel	Fuel Farm, DSSC
K.E. Cone	Base Maintenance
E.T. Smith	Base Maintenance

Special appreciation is expressed to T.R. Rankins for his willing cooperation and able assistance in carrying out the work.

2. PURPOSE

The purpose of the survey was to carefully inspect all of the existing facilities to determine deficiencies and to make recommendations for repair, rehabilitation and modernization. This has become necessary due to leakage problems, obsolescency and environmental and safety violations.

3. MAIN BASE

a. Storage Tanks currently in use are as follows:

Tank #	Use	Capacity (gals)	Type
S-1036	kerosene	15,000	Horizontal; mounded-over steel
S-1034	kerosene	12,000	Horizontal; mounded-over steel
S-1033	premium mogas	12 000	Horizontal; mounded-over steel
S-1031	regular mogas	15,000	Horizontal; mounded-over steel
S-1029	regular mogas	15,000	Horizontal; mounded-over steel
S-1027	regular mogas	15,000	Horizontal; mounded-over steel
S-1025	unleaded mogas	12,000	Horizontal; mounded-over steel
S-1023	unleaded mogas	12,000	Horizontal; mounded-over steel
S-1035	kerosene	15.000	Horizontal; mounded-over steel
S-1032	kerosene	12,000	Horizontal; mounded-over steel

Enclosure (1) to NAVFAC 0453/NLT
ltr 11162 Ser 80-73 dated 3 July

Attachment 2

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Tank #	Use	(Gals)	
S-1030	kerosene	12,000	Horizontal; mounded-over steel
S-1029	regular mogas	15,000	Horizontal; mounded-over steel
S-1026	regular mogas	15,000	Horizontal; mounded-over steel
S-1024	regular mogas	15,000	Horizontal; mounded-over steel
UNKNOWN	regular [illegible]	2,900	Horizontal; underground steel
UNKNOWN	kerosene	2,700	Horizontal; underground steel
S-1009	DF-2	600,000	Vertical; aboveground steel

b. Total storage capacity is as follows:

DF-2	600,000 gallons
regular mogas	90,000 gallons
unleaded mogas	24,000 gallons
premium mogas	12,000 gallons
kerosene	72,000 gallons

798

= 990K Bbls Oil

c. Total amount of fuel issued from 1 June 1979 to 31 May 1980 was as follows:

DF-2	3,433,752 gallons
regular mogas	926,310 gallons
unleaded mogas	871,625 gallons
premium mogas	70,856 gallons
kerosene	592,242 gallons

5,898,785

d. Observations and Discussion

(1) Based on the foregoing storage and issue data, existing storage capacity is considered adequate. This does not take into account contingency planning or mission changes which were not available to the investigator.

(2. These fuel facilities are approximately 35 years old. Because of age, there has been general corrosion and deterioration of the tanks and pipelines. Maintenance over the years has been minimal due to insufficient funding. Likewise, modification funding to keep abreast of the latest state-of-the-art has not been available.

(3) Some fuel facility deficiencies where Camp Lejeune has not kept pace with new fueling system design concepts include such items as automatic high liquid level alarms, tank coatings, dead man control, impervious diked areas and containment curbs with oil-water separators for truck fill stands.

(4) As far as could be determined, the fuel storage tanks have never been cleaned since they were built. Also, until recently, there was no regular scheduled program for water draw-off. There are many buried valves and buried flanges that cannot be inspected or maintained.

(5) About two years ago automatic liquid level indicators were installed in all the tanks with a central readout console in Pumphouse No. 1004. This

ystem has never been operable since it was completed. The tape on the float e in Tank No. S-1009 had been removed. It was reported a contract had cently been negotiated with a firm to come in and repair this system, calibrate t and put it into operation.

(6) Inspection of aboveground Tank No. S-1009 showed the exterior oating was beginning to peel and there is evidence of rust. There were some articularly bad spots on the tank top. The diked area was obviously not mpervious and the holding capacity appeared insufficient. There was no flat rea on the basin floor around the tank and dirt and weeds were on top of the ing foundation around the tank perimeter. There was no oil-water separator n the drain line from the basin area and the drain valve had no lock to prevent nauthorized opening.

(7) The base had attempted to empty and vapor free Tank No. S-1031 for a thorough internal inspection. A leaking tank valve was discovered which made it impossible to vapor free the tank. Observations were made through the manhole without actual tank entry. The tank shell around the sides appeared to be in excellent condition with only minor surface corrosion. There was a narrow strip along the bottom about one foot wide the full length of the tank which showed somewhat more corrosion and pitting. There was no way to actually measure pit depths or take ultrasonic thickness readings. The best assumptions that could be made were that there were no perforations, but probably some significant pitting along this bottom strip. These pits may be as deep as 1/2 inch.

(8) As indicated above, the tank valve for Tank No. S-1031 leaked. It s also reported that one other tank valve was known to leak badly. Because of their age, it is expected all the tank valves leak. This may also be the cause of erroneous gage readings due to fuel leaking from one tank into another because of differences in static head.

(9) The present location of the truck fill stands are too close to a public road and far too close to the vehicle fueling area. Clearance criterion for truck fill stands from the nearest aboveground storage tank, building, public road, or other fuel loading or dispensing facility is at least 100 feet. One of the truck fill stands is approximately 30 feet from a public road and another is approximately 40 feet from other vehicle dispensing pumps. These clearance violations are considered extremely hazardous. Also, there are no fuel spill containment curbs around the truck fill stands.

(10) There are no fuel spill containment curbs around the truck unloading facility.

(11) The present location of the first row of mogas pumps (four pumps) is approximately 15 feet from the public road. Although there is no prescribed clearance criterion between mogas dispensing pumps and roadways, a distance of 15 feet is considered hazardous. A minimum clearance of 50 feet is recommended.

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c. Recommendations   HE. BACKHOE (FUEL FARM) 5186

(1) Repair the recently installed automatic liquid level indicators as necessary, calibrate and put the system into operation. As noted in paragraph d(5), this work has already been initiated. See Cary How (PWC)
600,000

(2) Empty and clean Tank No. S-1009 as soon as practicable. Brush sandblast flat surfaces in accordance with SSPC-SP7. Blast bottom welds to bright metal to permit adequate inspection. Inspect all internal surfaces for pits and all bottom welded seams for discontinuity, porous areas and cracks. Vacuum test all bottom welds and suspect areas on flat bottom surfaces for leaks. Use a vacuum box with a sponge rubber gasket around the bottom edge and a glass top for these tests. Apply a rich soapy film over the weld area to be tested. Place the vacuum box over the spot and pull a partial vacuum of at least three psig. Bubbles can be observed through the glass top wherever leaks occur. Remove the soapy film from the surface with a wet rag after completion of each test. Also, conduct thorough ultrasonic measurements of bottom plates. Record these measurements on a drawing of the tank properly referenced as to location. Readings should be taken on about three-feet centers. Take extra measurements in severely pitted areas and subtract the depth of adjacent pits from the thickness readings. LE201H PWC WKS DESIGN DIV ... 4 To Contract in '82

(3) Depending on conditions found above, repair and coat the bottom interior of Tank No. S-1009 as follows to prevent further loss of steel, possible leakage, loss of product and environmental contamination: LE201H

(a) If loss of plate thickness is severe, if pitting is severe or if leaks are found, repairs must be made by welding. Repair random pits over 1/8 inch deep by filling with weld metal and grinding off smooth with the surface. Repair areas having more than six pits within a square foot area by covering the area with a new 1/4 inch thick steel cover plate and seal welding all around the plate. Repair defective weld seams showing leaks, surface porosity, cracks or other [illegible] defects by welding as necessary. [illegible] out and replace plates that are [illegible] repair.

(b) If corrosion has been minimal, sandblast the tank bottom and up twelve inches onto the tank shell to white metal in accordance with SSPC-SP5 and coat the entire bottom and up twelve inches in accordance with NAVFAC TS-09872. A copy of this guide specification can be furnished upon request.

(c) If the tank bottom has lost substantial amounts of steel due to corrosion, but not over half of the original thickness, sandblast to white metal as indicated above and line the bottom and up twelve inches onto the tank shell with 1/8 inch thick fiberglass reinforced polyester resin. Guide specifications for this lining system can be furnished upon request.

(4) Clean dirt and weeds away from the bottom perimeter on top of the concrete ring foundation all around Tank No. S-1009. Sandblast the entire exterior to a near-white condition in accordance with SSPC-SP10. Coat the entire exterior with one prime coat of inorganic zinc, one bond or tie coat and two finish LE201H

coats of vinyl paint. Guide specifications for this lining system can be furnished upon request.

(5) Install a new automatic high level alarm completely independent of the gaging system on Tank No. S-1009. It is understood this alarm will be installed in this tank and all other storage tanks under the Industrial Waste Collection and Treatment Facilities contract already awarded.

(6) Recalculate the volume of the diked area around Tank No. S-1009. Enlarge and reshape the dike so as to provide a volumetric capacity of the enclosure sufficient to retain the greatest volume of fuel that can be released from the tank plus one foot of freeboard. Provide a minimum flat surface of five feet between the tank foundation and the toe of the dike. Dike slopes must be no steeper than one foot vertical to one and one half feet horizontal. Provide a three foot wide flat surface on top of the dike. The inside and top of the dike and the floor of the basin area must be made impervious. Although there are alternative ways to achieve this, it is recommended these surfaces be covered with three inch thick concrete paving reinforced with woven wire fabric. Provide expansion and contraction joints in the concrete as necessary. Slope the floor of the basin to a new drain sump.

(7) Provide a new six inch steel drain line to outside the dike. Install a new normally closed lock type rising stem gate valve in the drain line inside the dike and provide a new concrete valve pit for this valve.

(8) Extend the drain line to outside the fenced area and provide a new concrete two stage gravity-type oil-water separator. Connect the water discharge from the separator to the base sanitary or storm drain system. Run a line for the oil skimmings to a waste tank. Also, provide a bypass with a gate valve, to permit drainage of normal water runoff directly into the sanitary or storm drain without passing through the oil-water separator.

(9) Install new pressure-vacuum vents on all existing underground tanks. Vent settings shall be one and one half ounces per square inch for pressure and one half ounce per square inch vacuum.

(10) Install new automatic high level alarms on all of the underground storage tanks. It is understood these alarms will be installed under the Industrial Waste Collection and Treatment Facilities contract already awarded.

(11) Install new concrete access pits over the manhole covers of all the underground storage tanks. It is understood this work will also be accomplished under the same contract indicated in the previous item.

(12) Relocate and Replace install new piping, new tank valves and new concrete valve pits for all storage tanks. Use double seated block and bleed valves for this service. Recommend use of either ball or non-lubricated plug valves. Redesign and locate piping so as to combine and minimize the number of valve pits required. Also, as far as practicable, locate valve pits outside of mounded area to avoid excessively deep pits. It is essential that all valves be accessible for proper maintenance.

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(13) Empty and clean the interiors of all the underground storage tanks. fully inspect the bottom for leaks. Use the vacuum box test described in ragraph 3e(2) to check the one foot wide strip along the tank bottoms. Repair y perforation found by drilling out the hole using an air drill (apply coolant the cutting edge of the drill), tap each hole and install a threaded tapered ug. Grind off the edges of the plug to make smooth. After repairs have been mpleted, sandblast all the tank interiors to white metal in accordance with FC-SP5 and coat the entire interiors in accordance with NAVFAC TS-09872.

(14) Recalibrate all the storage tanks during the time they are empty for leaning and coating. The horizontal tanks shall be calibrated in accordance ith API Standard 2551 and the vertical tank in accordance with API Standard 2550. alibration tables should show the volume of fuel in gallons in each tank for ry height of liquid measured in feet, inches and eighths of an inch. This ork must be done by a qualified experienced firm that can certify to at least ne year of prior successful experience in calibrating tanks of comparable type nd size.

(15) Construct a new three lane truck fill stand for all three products (mogas, diesel and kerosene) on the Northeast side of the tank farm and remove the existing truck fill stands. As indicated in paragraph 3d(9), the present location is extremely hazardous. Design the new fill stands in accordance with the latest technology with automatic fail safe electronic control systems. Each fill stand should be equipped with a meter with two-stage set-stop controls, flow control valve, deadman switch with pilot light, grounding and bonding ntinuity monitor, truck high level sensor with audible alarm and automatic cutoff and bottom loading connection with product selectivity type fill nozzle.

(16) Provide concrete paving for all truck fill positions with a concrete containment curb with sufficient capacity to contain one truck load (approximately 5,000 gallons). Be sure the ramp slopes over the curbs are gradual and that ingress and egress approaches will permit the trucks to travel in a straight line.

(17) Provide catch basins in the containment area and extend lines to a new oil -[illegible] separator. If possible utilize the same oil-water separator as recommended for the drain line from the diked area around Tank No. S-1009 as described in paragraph 3e(8).

(18) Provide new concrete paving in the truck unloading area with concrete containment curb, catch basins, drain lines and oil-water separator as described in the previous item for truck fill stands. It is understood this work will be performed under the Industrial Waste Collection and Treatment Facilities contract already awarded. P-996 substituted a Containment Basin vice oil/water Sep

(19) Relocate the row of four mogas pumps closest to the public road (Ash Street) to the opposite side of the service station building for greater safety. Provide new access roadways from Ash Street and eliminate the present access roadway from the adjoining parking lot.

Continue 10/2/89

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1. COMPONENT	FY 1982 MILITARY CONSTRUCTION PROJECT DATA	2. DATE
[illegible]		5 March 1981

3. INSTALLATION AND LOCATION	4. PROJECT TITLE
MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA 28542	REPAIR POL FACILITIES BASEWIDE

5. PROGRAM ELEMENT	6. CATEGORY CODE	7. PROJECT NUMBER	8. PROJECT COST ($000)
	124-50	LE201M	512.2

9. COST ESTIMATES

ITEM	U/M	QUANTITY	UNIT COST	COST ($000)
TOTAL COST	LS	-	-	465.6
CONTINGENCIES (10%)	LS	-	-	46.6
ESTIMATED CONTRACT COST (FUNDED)	LS	-	-	512.2
SUPERVISION, INSPECTION & OVERHEAD	-	-	-	-
PLANNING AND DESIGN COST (UNFUNDED)	LS	-	-	25.0
TOTAL FUNDS REQUESTED (FUNDED & UNFUNDED)	LS	-	-	537.2
INSTALLED EQUIPMENT PROVIDED FROM OTHER APPROPRIATIONS	-	-	-	

10. DESCRIPTION OF PROPOSED CONSTRUCTION

Clean and repair petroleum/oil/lubricant tanks. Perform vacuum tests, sandblasting, and required repairs. Install automatic high level alarms. Rework dikes, miscellaneous piping and valves to be replaced. See PWD Dwg #14226.

11. REQUIREMENTS:

PROJECT: Repair POL facilities.

REQUIREMENT: Facilities are utilized as fuel storage and dispensing facilities. Scope of this project was determined by a condition survey initiated by NAVFACENGCOM from 10-12 June 1980.

CURRENT SITUATION: POL facilities are approximately 36 years old, resulting in general corrosion and deterioration of tanks and pipelines.

IMPACT IF NOT PROVIDED: Deterioration leakage problems, and potential violation of environmental and safety standards will continue.

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COST ESTIMATE

DATE PREPARED: 19 [illegible] 1991

SHEET 1 OF [illegible]

[illegible] CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA 28542

REPAIR POL FACILITIES BASEWIDE

ESTIMATED BY: D. V. MARSHBURN

IDENTIFICATION NO.: LE20[illegible]1

CATEGORY CODE: 124-50

STATUS OF DESIGN: [X] PDP [ ] 35% [ ] 100% [ ] FINAL [ ] OTHER (SPECIFY)

ITEM DESCRIPTION	QUANTITY NUMBER	QUANTITY UNIT	MATERIAL COST UNIT COST	MATERIAL COST TOTAL	LABOR COST UNIT COST	LABOR COST TOTAL	ENGINEERING UNIT COST	ENGINEERING TOTAL
CLEAN AND TEST TANK NO. S-1009	1	LS						7,200
REPAIR TANK S-1009	1	LS						[illegible],400
REPAIR EXTERIOR OF TANK NO. S-1009	1	LS						7,000
[illegible] DIKE	1	LS						61,100
REPLACE DRAIN FROM DIKE	1	LS						3,600
[illegible] EXISTING AND REPLACE PRESSURE [illegible]	1	LS						6,050
[illegible] EXISTING AND REPLACE PIPING VALVES								
AND CONCRETE	1	LS						1[illegible]2,200
CLEAN AND TEST UNDERGROUND TANKS	1	LS						33,600
RECALIBRATE UNDERGROUND TANKS	1	LS						10,000
SUBTOTAL								342,980
OVERHEAD (15%)								51,447
TAXES, INS., S.S. (12% OF LABOR)								24,694
SUBTOTAL								419,121
PROFIT (10%)								41,912
SUBTOTAL								461,033
[illegible] (1.0%)								4,610

Doc No: CLEJ-00231 F1.02 - 8/7/89

[illegible] 19 [illegible] 1981 | SHEET 2

[illegible] BASE
[illegible], NORTH CAROLINA 28542
[illegible]PAIR POL FACILITIES BASEWIDE

LC201R

ESTIMATED BY: D. V. MARSHBURN

CATEGORY CODE: 124-50

JOB ORDER NO.:

STATUS OF DESIGN: [X] PED [ ] [illegible] [ ] [illegible] [ ] FINAL [ ] OTHER (Specify)

ITEM DESCRIPTION	QUANTITY: NUMBER	QUANTITY: UNIT	MATERIAL COST: UNIT COST	MATERIAL COST: TOTAL	LABOR COST: UNIT COST	LABOR COST: TOTAL	ENGINEERING: UNIT COST	[illegible]
[illegible]TOTAL								435,643
[illegible] (10%)								[illegible]
[illegible] CONTRACT COST								51[illegible],207
[illegible] AND DESIGN								[illegible]
[illegible] ESTIMATED COST								537,207
							SAY:	537,200

Doc No: CLEJ-00231-1.02-8/9/89

1. COMPONENT	FY 19 8 MILITARY CONSTRUCTION PROJECT DATA	2. DATE
NAVY		7 Mar 83

3. INSTALLATION AND LOCATION	4. PROJECT TITLE
MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA 28542	POL TRUCK DISPENSING UNITS, FUEL FARM

5. PROGRAM ELEMENT	6. CATEGORY CODE	7. PROJECT NUMBER	8. PROJECT COST ($000)
	126-30	LE433R	190.3

9. COST ESTIMATES

ITEM	U/M	QUANTITY	UNIT COST	COST ($000)
TOTAL COST	LS	1	-	173.0
CONTINGENCY -10%	LS	1	-	17.3
TOTAL CONTRACT COST	LS	1	-	190.3
SUPERVISION, INSPECTION & OVERHEAD	-	-	-	-
DESIGN COST - 6%	LS	-	-	19.0
TOTAL FUNDS REQUESTED	LS	1	-	209.3
INSTALLED EQUIPMENT OTHER APPROPRIATIONS	-	-	-	-

10. DESCRIPTION OF PROPOSED CONSTRUCTION

Provide fuel farm improvements by providing new truck fill stands with associated pumps, valves, piping, pavement and oil spill controls. See the attached layout.

11. REQUIREMENTS:

PROJECT: Provide new truck fill stands with capability for pumping Diesel, Regular, Unleaded, and Kerosene fuels.

REQUIREMENT: Existing fuel farm system supports Base functions and fuel requirements for Base tenants, 2d Marine Division FMF, and 2d Force Service Support Group REIN.

CURRENT SITUATION: Existing facilities are located too close to Ash Street, creating a safety hazard that was identified by a Condition Survey conducted by COMNAVFACENGCOM in June 1980, Risk Assessment Code IIC3.

IMPACT IF NOT PROVIDED: Continued hazardous operation of fuel dispensing system.

ATA

DD FORM 1 DEC 76 1391

PREVIOUS EDITIONS MAY BE USED INTERNALLY UNTIL EXHAUSTED

S/N 0102 LF-001-3910

☆U.S. GOVERNMENT PRINTING OFFICE: 1979—603-076/3959 2-1

Attachment 4

NAVFAC 11013/7 (1-70)
Supersedes NAVDOCKS 2417 and 2417A

COST ESTIMATE

DATE PREPARED: 7 Mar 83

SHEET 1 OF 1

ACTIVITY AND LOCATION: MARINE CORPS BASE, CAMP LEJEUNE, NC 28542

CONSTRUCTION CONTRACT NO.:

IDENTIFICATION NUMBER: LE433R

PROJECT TITLE: POL TURCK DISPENSING UNITS, FUEL FARM

ESTIMATED BY: V. MARSHBURN

CATEGORY CODE NUMBER: 126-30

STATUS OF DESIGN: [ ] PED [ ] 30% [ ] 100% [ ] FINAL [X] Other (Specify) Project

JOB ORDER NUMBER:

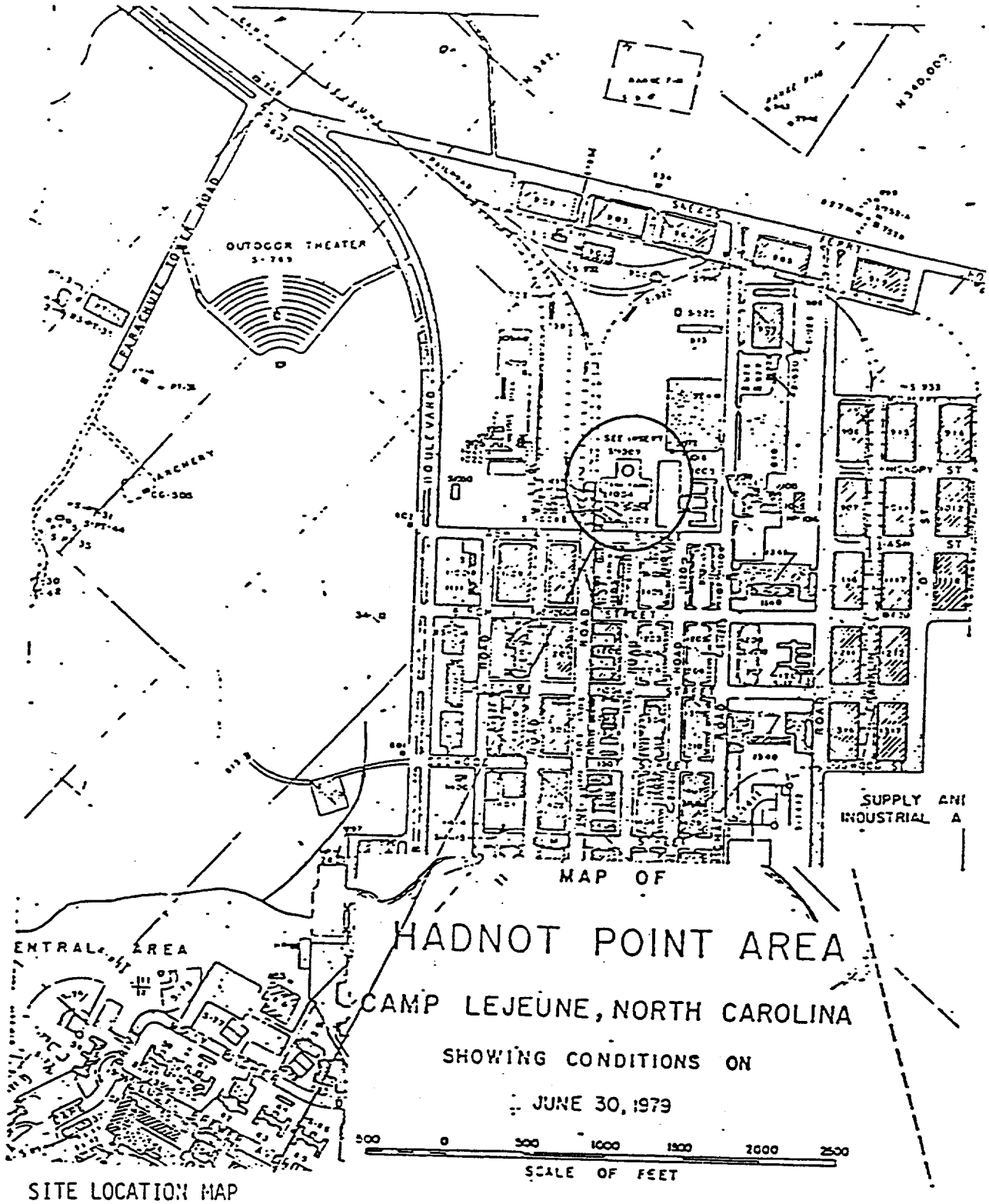
ITEM DESCRIPTION	QUANTITY NUMBER	QUANTITY UNIT	MATERIAL COST UNIT COST	MATERIAL COST TOTAL	LABOR COST UNIT COST	LABOR COST TOTAL	ENGINEERING ESTIMATE UNIT COST	ENGINEERING ESTIMATE TOTAL
EXTEND CULVERT	200	LF	25	5,000	20	4,000		9,000
ASPHALT PAVING	3,000	SY	10.00	30,000	5.00	15,000		45,000
TRUCK FILL STANDS w/ATTENDANTS BOOTH	2	EA	10,000	20,000	5,000	10,000		30,000
PIPING, VALVES, METERS, PUMPS	1	LS	25,000	25,000	10,000	10,000		35,000
OIL SPILL CONTROL	1	LS	5,000	5,000	1,500	1,500		6,500
SUBTOTAL				85,000		40,500		125,500
OVERHEAD - 15%								18,825
TAXES, INS., S.S. 18% OF LABOR								7,290
SALES TAX 4% OF MATERIAL								3,400
SUBTOTAL								155,015
BOFIT - 10%								15,501
SUBTOTAL								170,516
BOND - 1.5%								2,557
SUBTOTAL								173,073
							SAY	173,000

Doc No: CLEJ: 00231 - 1.02 - 8/9/84

S/N 0105-LF-010-1355

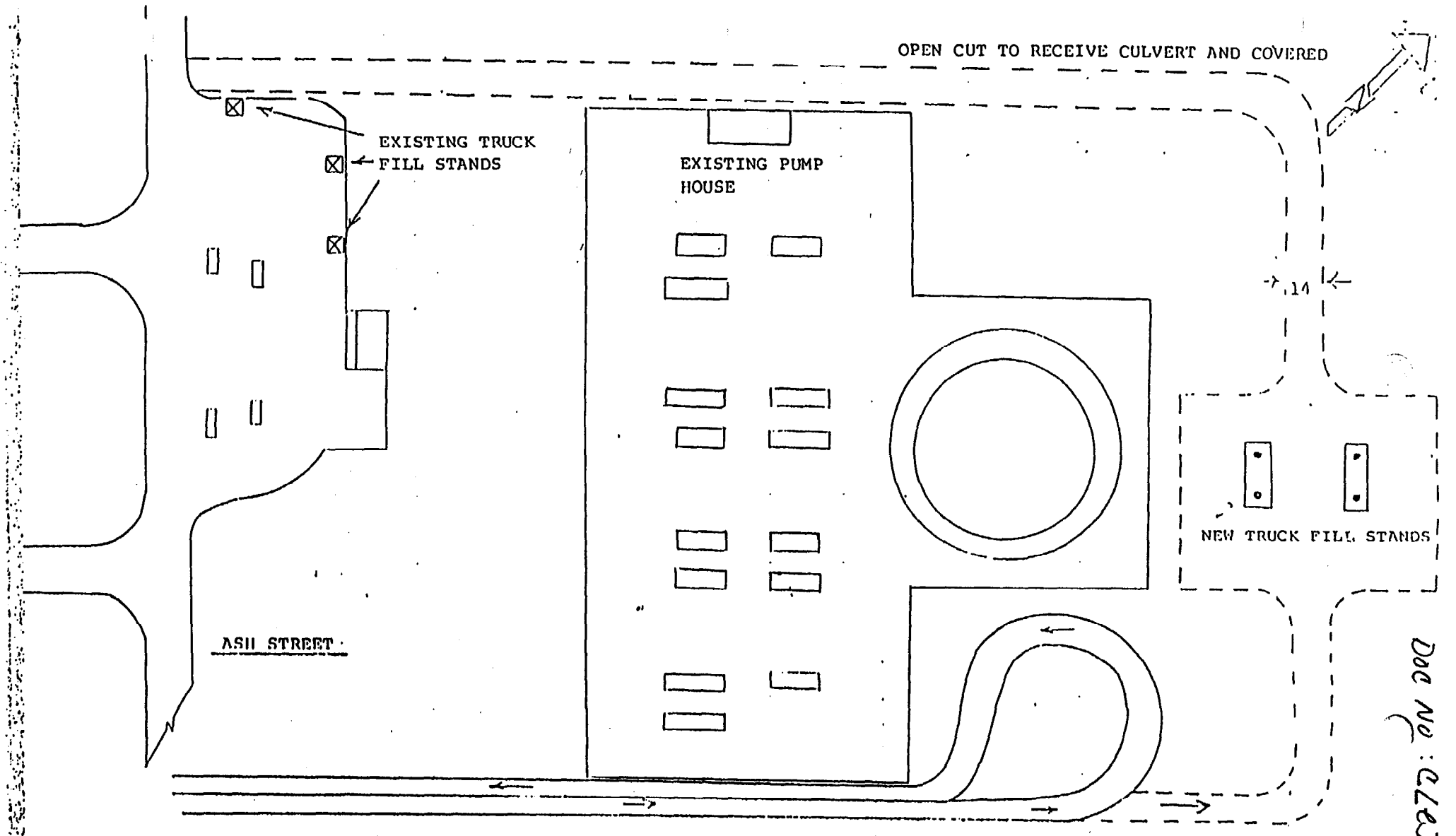
U.S. GOVERNMENT PRINTING OFFICE: 1980—000-199/6000

Doc No: CLEJ-00231-1.02 -
8/9/89



SITE LOCATION MAP

RELOCATE POL TRUCK DISPENSING - UNITS, FUEL FARM



PROPOSED FUEL FARM LAYOUT

NOT TO SCALE

PUBWKS SKETCH 482

Doc No: CLEJ-00231-1.02 - 8/9/89

TO COMMANDANT OF THE MARINE CORPS (CODE LFF)

DOC NO: CLEJ-0023I-1.02-8/9/89 (4700)

FROM
MARINE CORPS BASE, CAMP LEJEUNE NC 28542

CATEGORY CODE AND PROJECT TITLE	TYPE OF FUNDING	COST ($000)	PROGRAM YEAR
126-30 POL TRUCK DISPENSING UNITS, FUEL FARM	O&MMC	190.3	FY-84

PROJECT DESCRIPTION
Fuel farm improvements at Hadnot Point.

REMARKS
Existing facilities are located too close to Ash Street, creating a safety hazard. Risk Assessment Code IIC3.

TYPE OF MAP	DATE
SITE LOCATION MAP (encl 1)	-

REQUESTED BY (Typed name and signature)
R. E. CARLSON, CDR, CEC, USN

DATE: 7 Mar 83

ANALYSIS (Place a check (✓) in the appropriate each item) Yes, No, NA = Not Applicable

DATE RECEIVED

Y	N	NA	PROJECT SITING CONSIDERATION	Y	N	NA	PROJECT SITING CONSIDERATION
✓			a. COMPATIBLE WITH ACTIVITY PLANNED DEVELOPMENT GOALS				b. COMPLIES WITH THE FOLLOWING CRITERIA
✓			c. DEMONSTRATES SOUND PLANNING PRINCIPLES			✓	(1) AMMUNITION AND EXPLOSIVES
✓			d. MEETS MINIMUM PLANNING AND SITING CRITERIA			✓	(2) ELECTROMAGNETIC RADIATION
						✓	(3) AIRFIELD SAFETY
						✓	(4) NOISE INTENSITY
						✓	(5) FIRE PROTECTION

COMPATIBLE WITH ACTIVITY MASTER PLAN (Check appropriate box)

- ☐ IDENTICAL
- ☐ DIFFERENT BUT CONSISTENT
- ☑ NOT SHOWN BUT CONSISTENT
- ☐ *NOT SHOWN AND INCONSISTENT
- ☐ *DIFFERENT AND INCONSISTENT

CRITERIA CERTIFICATION IS REQUESTED (Check) ☐ DDESB ☐ CNO ☐ NAVSEA ☐ NAVELEX ☐ NAVAIR ☐ OTHER — DATE

DATE CERTIFICATION S RECEIVED

DDESB	CNO	NAVSEA	NAVELEX	NAVAIR	OTHER

ACTION
☑ APPROVED ☐ DISAPPROVED ☐ DEFERRED

REMARKS

SITE APPROVED
HQMC
DATE 5/24/83
BY [illegible]

APPROVING OFFICIAL (Typed name and signature)

DATE: 24 MAY 1983

*Requires approval of a major change to the master plan prior to site approval

Encl 12

Dan DE

Doc NO: CLtJ-00231-1.02-8/9/89

SAM
John
Betz
Tom

File 6S

6280/9.
FAC

MAY 1 8 1988

Mr. Preston Howard
NC Division of Environmental Management
Wilmington Regional Office
7225 Wrightsville Avenue
Wilmington, North Carolina 28403

RE: NOTICE OF RELEASE FROM UNDERGROUND FUEL STORAGE FACILITIES HADNOT POINT FUEL FARM

Dear Mr. Howard:

We are forwarding information at the enclosures regarding the identification of fuel products in the groundwaters underlying the subject fuel farm. This data as noted in the engineer's letter represents the initial field data collection and will be followed by a detailed plume report in the next three to four weeks.

This detailed engineering report will document the plume boundary and estimated product thickness and provide a recommended location for a recovery well or wells. We will forward this report to you immediately upon receipt by our office.

In the interim, the Commanding General has directed the Fuel Farm be closed and the tanks and lines drained. An interim fuel farm will be established with all environmental precautions to preclude further contamination. We have programmed a permanent replacement facility for the fuel farm and will keep you abreast of developments in the design and construction process as it unfolds.

Attachment 5.

Doc NO: CLEJ-00231-1.02-8/9/89

6200/9
FAC

For further information in this matter, please contact Mr. Bob Alexander, (919) 451-3834.

Sincerely,

T. J. DALZELL
Colonel, U. S. Marine Corps
Assistant Chief of Staff, Facilities
By direction of the Commanding General

Encl:
(1) O'Brien & Gere, Inc. ltr of 26 Apr 88 w/o well boring logs

Copy to:
CMC-LFL
LANTDIV (114)
O'Brien & Gere, Inc.

Blind copy to:
AC/S, Log
SJA
JPAO
NREAD
BHO
PWO
EnvEngr

Doc No: CLEJ-00231-1.02-8/9/89

VEHICLE POPULATION, MAIN SIDE FUEL FARM, BLDG 1002

TYPE OF VEHICLES SERVED: COMMERICAL AND TACTIAL

NUMBER OF VEHICLES: AVG. 243 PER DAY (SAMPLE MONTH OF MAY)
HOURS OF OPERATION 0500-2300
80% ARE BETWEEN 0800-1630 (195)
THIS EQUALS TO ONE VEHICLE APPROX.
EVERY 2.5 MINUTES. OVERALL IS ONE
EVERY 4.19 MINUTES.

BULK LOADING = AVG. 7 PER DAY

Attachment 6

Doc No: CLEJ-0022[illegible]-1.02-8/9/89.

fflejl/m4

Questions for meeting on new (interim) fuel farm on 19 July 89.

1. Have any investigations been conducted to determine the source of leaks (i.e. tanks, piping) at the Hadnot Pt fuel farm? If so, have them available. YES/NO

2. Can Part of the existing facility be isolated for continued use or repaired for continued use until Milcon comes on line? ~~YES~~ NO

3. Have regulatory agencies issued a notice of violation, or other regulatory requirements associated with cleanup of contamination at the fuel farm? If so, have them available. NO

4. Are tank inventory records available, which would provide an indication of where ~~most~~ the most serious leaks have occurred? YES YES

NC Groundwater Rules: NO detectable Fuel Gals in GW.

NO (very inaccurate*)

5. Is proposed site of interim fuel farm located over contamination plume? NO- MAPS

6. What assets are available to meet requirements if no action?

7. What is the vehicle population and make-up served at the dispensing point?

8. Is earth-berm with liner adequate containment at new site? Would this significantly reduce cost?

* Allowable losses from "stick-gauging" are.

½ of 1% : .05% of 10000 gals = 50 gals

or < 1/16" measurement on stick ⇒

i.e. NOT VISIBLE TO PERSON RECORDING MEASUREMENT

NO RECORDS OF MINOR LEAKS

Doc NO: CLEJ - 00231 - 1.02 - 8/9/89

HEADQUARTERS, MARINE CORPS BASE, CAMP LEJEUNE

POSITION PAPER: DATE:

Subj: BASE BULK FUEL STORAGE FACILITY

Ref: (a) Cdr, NAVFACENGCOM ltr 04B3/HJI 11162 Ser 80-73 of 3 Jul 80
(b) OIC, DSSC ltr DSSC/DRF/edw 11300 of 1 Mar 83
(c) AC/S, Fac ltr 6280/9 FAC of 12 May 88
(d) Cdr, DLA ltr DFSC-OI of 1 Jul 88

1. PROBLEM: To develop a Command position on the concept of future Marine Corps Base, Camp Lejeune bulk fuel operations and associated support to tenant organizations.

2. WHY REQUIRED: A Command position on the subject matter is required due to the inevitable closure of the current facility for environmental reasons.

3. BACKGROUND:

a. The bulk fuel storage facility located adjacent to the intersection of Ash Street and Gibb Road in the Industrial Area was constructed approximately 45 years ago, circa 1943.

b. The Commander, Naval Facilities Engineering Command reported in 1980 the facility was badly in need of major repairs and modifications due to general corrosion and tank deterioration. Additionally, extremely hazardous conditions are cited, e.g., truck fill stands were too close to a public road (Ash Street) and far too close to the vehicle refueling area. Reference (a) refers. Apparently, lack of a coordinated effort among Public Works, Base Maintenance, and Logistics precluded substantial improvement of the situation.

c. During March, 1983, the OIC, DSSC indicated piece meal rehabilitation of the present fuel facility would not be cost effective and recommended a major rehabilitation of the facility to include: relocation of bulk loading stands, dispensing pumps, unloading area, and the administration building. Additionally, installation of refueler parking area with spill containment capability, tank liquid level indicators, fencing, POV parking, and deluge eye wash/shower were recommended. Further, excavation and exposure of all tanks and pipes were recommended. These recommendations were endorsed to the Assistant Chief of staff, Facilities. Reference (b) refers.

d. Based on the preceding information, it appears a new bulk fuel storage and dispensing facility was planned, documented, and submitted during July, 1985. Subsequent correspondence reduced the capacity of the proposed project from 925,000 gallons to 128,000 gallons. The new facility is programmed, but in all probability, five years from completion.

e. The Assistant Chief of Staff, Facilities notified the North Carolina Division of Environmental Management during May, 1988 that fuel product contamination in the groundwater underlying the current bulk fuel facility had been identified. Additionally, he indicated the Commanding General had directed the bulk fuel facility be closed and an interim facility be established pending a permanent facility.

f. Several alternatives have been discussed and evaluated. Those alternatives are outlined below with pertinent comments.

(1) Discussions were held with representatives of 2d Force Service Support Group regarding the use of Amphibious Assault Fuel Systems (AAFS). The 2d FSSG proposed to set the AAFS up in the vicinity of the Field Ammunition Dump (FAD) located on Piney Green Gate Road. The 2d FSSG enthusiastically supported this alternative as it would provide an excellent training opportunity for the Bulk Fuel Company of 8th Engineer Support Battalion. There are three factors which preclude implementation of this alternative:

(a) In the event of the contingency operations, the Bulk Fuel Company could be deployed eliminating our retail capability.

(b) The access road to the FAD is an unimproved dirt road which under adverse weather conditions could restrict deliveries/issues by commercial tankers and refuelers.

(c) It was estimated that construction of concrete pads and berms for the 20,000 gallon bladders might cost $400,000.

(2) Discussions were held with representatives of the Marine Corps Exchange (MCX) regarding the purchase of fuel from the Exchange System. Exchange representatives enthusiastically supported this alternative. There are three factors which preclude implementation of this alternative:

(a) Regulatory restraints on the purchase of supplies/services from the Exchange System.

(b) The unavailability of diesel fuel of which approximately 10,000 gallons per week are dispensed through our retail outlet.

(c) Potential default problems with the Defense Fuel Supply Center (DFSC) contracts.

(3) There appear to be a number of tanks throughout the Base which are no longer used, e.g., three 15,000 gallon capacity tanks at Midway Park. However, there are apparently none in the Hadnot Point area. Our largest retail customers are located mainside, Base Maintenance, and Base Motor Transport.

(4) Rail tankers have been evaluated. They provide a good contingency storage capability but no metered issue capability. Additionally, location, safety, and environmental questions would have to be resolved.

(5) An interim facility in the Hadnot Point area has been evaluated. An interim facility offers the advantages of maintaining customer support, maintaining control of the inventory, and minimizing costs. The following specifics are provided:

(a) Position three temporary 15,000 gallon tanks (unleaded gasoline and diesel) on the paved parking lot between Building 1003 and 926/927/928 adjacent to Michael Road in the Industrial Area. Costs for the tanks are estimated to be approximately $6,000 each.

(b) Install a 46 x 35 foot concrete pad and containment wall for any potential spills. Cost unknown.

(c) Install five dispensing pumps and three unloading pumps adjacent to the temporary tanks. Costs would be negligible as assets are available in house.

(d) Modify one of three empty buildings (926, 927, or 928) to serve as issue/attendants booth. Cost unknown.

(6) Fuel requirements for the period 1 April 1989 through 31 March 1991 must be provided to DFSC by 15 October 1988. In addition to fuel requirements, the number of capacity of storage tanks for each type of fuel must be provided. Requirements received after 15 October 1988 will not be included in the basic solicitation. Reference (d) refers.

4. POSITIONS OF OTHER AGENCIES: Not applicable.

5. RECOMMENDED MARINE CORPS BASE POSITION: That a combination of an interim retail facility and utilization of abandoned storage tanks be adopted as the approved plan to provide fuel support until the replacement facility is completed.

6. RATIONALE: The recommended position facilitates continued retail support. It provides for approximately 45,000 gallon backup capacity at Midway Park. Additionally, the proposed position ensures appropriate inventory controls and accountability are maintained. The position allows us to initiate implementation planning in order to close the current facility as rapidly as possible. Finally, the proposed position allows us to meet Defense Logistics Agency (DLA) deadlines for requirements submission which ensures uninterrupted support and the lowest possible price. The plan has been tentatively concurred in by Assistant Chief of Staff, Facilities and Logistics.

7. RECOMMENDATIONS:

a. Approve the immediate planning and construction of an interim retail fuel facility on the parking lot between Buildings 1003 and 926/927/928.

	APPROVED	DISAPPROVED
Commanding General	_____	_____

b. Approve the use of three 15,000 gallon capacity fuel storage tanks located at Midway Park as an interim backup gasoline and diesel bulk storage facility.

	APPROVED	DISAPPROVED
Commanding General	_____	_____

c. Approve immediate action on all issues related to this initiative in order to commence operations from the interim facility by 1 January 1989.

	APPROVED	DISAPPROVED
Commanding General	_____	_____

d. Approve the use of priorities commensurate with the urgency of this initiative to ensure all actions are complete by 1 January 1989.

	APPROVED	DISAPPROVED
Commanding General	_____	_____

Doc No.: CLEJ-00231-1.02-8/9/89

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

IN REPLY REFER TO
6280
SJA41
29 MAR 1988

FOR OFFICIAL USE ONLY

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

Subj: LEAKING UNDERGROUND STORAGE TANKS (UST); GASOLINE CONTAMINATION IN HADNOT POINT FUEL FARM AREA

Ref: (a) AC/S, Fac ltr 6280/14 of 23Mar88
(b) General Statutes of North Carolina, § 143-215.75 et seq., North Carolina Oil and Hazardous Substances Pollution Control Act
(c) MCO P11000.8, Real Property Facilities Manual, Volume V

1. At the recent Marine Corps Natural Resources and Environmental Workshop, Mr. Alexander gave a presentation on Camp Lejeune's recovery of inadvertently leaked fuels from UST's aboard Camp Lejeune. He also briefed the attendees of the Hadnot Point Fuel Farm contamination and the steps the Command was taking to address the problem. Mr. Alexander presented a disconcerting fact that the tanks are in such deteriorated state that they continue to leak at a rate of approximately 1,500 gallons per month.

2. Phone contact with Mr. Alexander on 25 March 1988 revealed the details of the plan to address this problem (i.e. develop more wells; identify the plume; design recovery wells; receive bids to construct recovery system; award a contract; disposition of recovered fuel). Reference (a) notified the Commanding General of the situation, explaining that a MILCON project is scheduled in the out-years for replacement of the leaking UST's, with a possibility that replacement could be moved up to a near year.

3. In my opinion two additional steps should be taken:

a. Apply pressure upon HQMC to move up the replacement of these leaking USTs to the immediate future. The loss of 1,500 gallons per month will be difficult for taxpayers to understand, and the extremely high costs of recovering that lost fuel exacerbate the problem. With other contaminants in that area, disposition of the recovered fuel may be difficult, and its value concomitantly diminished. From a non-engineer viewpoint, I cannot evaluate the reasonableness of the Command's and HQMC's approach to remedying the problem. From an attorney's perspective, concerned with responding to potential litigation, it appears patently unreasonable to wait until out-years to replace the tanks. Such delay will result in an indefensible waste of money, and a continuing potential threat to human health

and the environment. Formally applying to HQMC for expedited action will assist in demonstrating to the public and the residents of Camp Lejeune that the Command took swift, reasonable action.

b. Notify the North Carolina Department of Environmental Management (Department of NRCD). Reference (b) explicitly excepts discharges of oil caused by the United States government into lands of North Carolina from being "unlawful" discharges. However, reference (b) does require notice of such a discharge, even though it is not unlawful. Section 143.215.85 provides:

> Every person owning or having control over oil or other substances discharged in any circumstances other than pursuant to existing regulation of the Environmental Management Commission or the U.S. Environmental Protection Agency or pursuant to a permit required by G.S. 143-215.1 or the Federal Water Pollution Control Act, upon notice that such discharge has occurred, shall immediately notify the Department...of the nature, location and time of the discharge and of the measures which are being taken to contain and remove the discharge.

"Person" as used above is defined in § 143.215.77(13): "...any and all natural persons, firms, partnership, associations, public or private institutions, municipalities or political subdivisions, governmental agencies...." (Emphasis added). Additionally, paragraph 4103.1 of reference (c) states: "...Marine Corps activities shall comply with the requirements of Federal, State, and local environmental laws and regulations and demonstrate leadership in pollution abatement and environmental enhancement."

Not only is such notice required by law and regulation, but prudence also dictates such action. The Base will soon be organizing the Technical Review Committee for the CERCLA (SARA) NPL cleanup, and the nature of the Hadnot Point groundwater contamination will be fully explained to the members. Naturally, they will be concerned about the steps the Base is taking to stop further contamination, and State officials in particular will want to know why they were not advised earlier. Providing notification to the State now will ensure the Base establishes its credibility as an open, frank, totally-candid player in the NPL cleanup process--which is a crucial objective in the NPL cleanup process.

4. I offer my Office's assistance to you in tackling this sensitive issue.

A. P. TOKARZ