Vol III

6241/2
NREAD
8 OCT 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Base Maintenance Division, Marine Corps Base, Camp Lejeune, (Attn: Util Dir)

Subj: HAZARDOUS WASTE DETERMINATION ON DRUM AT BUILDING 1700

Encl: (1) JTC Environmental Consultants, Inc., Report No. 539, Table 3
(2) JTC Environmental Consultants, Inc., Report No. 539, Addendum Tables 3 & 6

DDS Supvy Eco l.

1. On 7 January 1987, the black drum containing an "unknown" substance at Building 1700 was sampled by Natural Resources and Environmental Affairs Division personnel. The enclosures contain the analysis of the black drum marked with sample number 87-20. The analysis indicated that the contents of the drum are an ignitible waste and test toxic for lead. The primary EPA Hazardous Waste Number is D001, with a secondary EPA Hazardous Waste Number of D008.

2. It is recommended that the drum be turned in to DRMO as a hazardous waste. The point of contact on this matter is Ms. Elizabeth Betz, Supervisory Chemist, Natural Resources and Environmental Affairs Division, at extension 5977.

J. I. WOOTEN

Copy to:
Base HMDC
DRMO

Blind copy to:
EC&MS (2)

Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

Date: 4-22-87 Report No. 539 to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 3

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		TOX ppm	Corrosivity pH	Flashpoint# °C	PCB ug/g				
87-20 top layer	12-4453	100	*	40	<5				
87-20 bottom layer	12-4453	<500	*	35	**				

* unable to do analysis due to sample matrix
# level of confidence ± 5°C
* insufficient sample volume to do analysis

ENCLOSURE (1)

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

Date: 6-17-87 Report No. 539 Add to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 3

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		Reactivity							
		Cyanide ug/g	Sulfide ug/g						
87-20 top layer	12-4453	<10	<10						
87-20 bottom layer	12-4453	<10	<10						

ENCLOSURE (2)

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

Date: 6-17-87 Report No. 539 Add to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 6

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		As mg/kg	Ba mg/kg	Cd mg/kg	Cr mg/kg	Pb mg/kg	Hg mg/kg	Se mg/kg	Ag mg/kg
87-20 top layer	12-4453	<10	<10	<1	<0.75	14.3	<0.1	<10	<1
87-20 bottom layer	12-4453	<10	<10	<1	<0.75	<5	3.3 ug/L	<10	<1

6240
NREAD
6 Oct 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Assistant Chief of Staff, Training and Operations, Marine Corps Base, Camp Lejeune

DPS

Subj: HAZARDOUS MATERIAL PACKAGING TRAINING

Ref: (a) AC/S, Training & Operations ltr 1500 Trng & Ops of 29 Sep 87

Encl: (1) List of nominees for Defense Packaging of Hazardous Materials for Transportation

1. Reference (a) was provided to this office by SSgt Scott, extensions 1714/5276 informally. SSgt Scott requested a list of potential nominees for the subject training.

2. If the subject training is held at Camp Lejeune, then those individuals listed in Section A of the enclosure are nominated and would benefit greatly from the training. It is also recommended that those officials listed in Sections B - E of the enclosure be requested to submit nominees in that hazardous material and hazardous waste disposal must be done in accordance with transportation regulations.

3. Point of contact in this matter is Mr. Sammy Gwynn, NREAD, at extensions 1690/2083.

J. I. WOOTEN

LIST OF NOMINEES

SECTION A

NREAD:

Ken Warren
Sammy Gwynn
John Riggs
Manuel Martin
Tom Barbee

Hazardous Waste Inspectors and Specialists

SECTION B

2D Marine Division:

Lt Gonzales, Division Engineer, Hazardous Material Disposal Coordinator

SECTION C

2D Force Service Support Group:

Lt Byrnes, Facilities and Safety, G-4, Hazardous Material Disposal Coordinator

SECTION D

MCAS, New River:

Barbara Coogle, Grounds Safety Office, Hazardous Material Disposal Officer

SECTION E

Defense Reutilization and Marketing Office:

Nadine Hipp, Chief

Enclosure (1)

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

IN REPLY REFER TO:
1500
TRNG&OPS
29 Sep 87

From: Assistant Chief of Staff, Training and Operations
To: Assistant Chief of Staff, Logistics
Civilian Personnel Division (Attn: Training Dept)

Subj: DEFENSE PACKAGING OF HAZARDOUS MATERIALS FOR TRANSPORTATION MOBILE TRAINING TEAMS (MTT); REQUIREMENTS FOR

Encl: (1) CG FMFLant 281830Z Sep 87

1. Request that you review the enclosure and submit requirements to this department (Attn: Base Training) by 6 October 1987.

2. Point of contact at this department is SSgt Scott, extensions 1714/5276.

J. F. Charles
J. F. CHARLES
By direction

NO. & NAMES

MCB TRNG SECT			
	INT	ACT	INT
TRNG O			
TRNG CH			
SCH NCO			
TRNG NCO			
D/A NCO			
L/HR NCO			
TCT NCO			
CLERK			

TRNG

PRIORITY

P 281830Z SEP 87

FM CG FMFLANT//SMO//

TO CG II MAF//G-4/EMBO//
CG SECOND MAW//G-4/EMBO//
CG SECOND FSSG//G-4/SMO/EMBO//
CG MCB CAMP LEJEUNE NC
TWO TWO MAU//S-4/EMBO//
TWO SIX MAU//S-4/EMBO//
CG SECOND MARDIV//G-4/EMBO//
CG SIXTH MAB//G-4/EMBO//
CG MCAS CHERRY PT NC
CG FOURTH MAB//G-4/EMBO//
TWO FOUR MAU SOC//S-4/EMBO//

UNCLAS //N01500//

SUBJ: DEFENSE PACKAGING OF HAZARDOUS MATERIALS FOR TRANSPORTATION MOBILE TRAINING TEAMS (MTT); REQUIREMENTS FOR

A. DOD 5010.16-C
B. CMC LTR 1500 SER TPIQ12445 DTD 29 JUL 87 (NOTAL)

1. REVIEW OF POST DEPLOYMENT AND POST EXERCISE CRITIQUES HAS UNDERSCORED A NEED FOR GREATER EMPHASIS ON CERTIFICATION AND PACKAGING OF HAZARDOUS MATERIALS. TO THIS END, THIS CMD WILL COORDINATE THE REQUESTING OF MOBILE TRAINING TEAMS FOR THE SUBJ CRS.

2. CRS DURATION IS 9 1/2 DAYS. PRIMARILY INTENDED TO TRAIN MILITARY PERSONNEL, CIVILIAN GOVERNMENT EMPLOYEES, AND QUALIFIED MEMBERS OF INDUSTRY IN THE CURRENT REQUIREMENTS AND PROCEDURES IN THE PREPARAT OF HAZARDOUS MATERIALS FOR TRANSPORTATION INCLUDING MARKING, CERTIFI CATION, HANDLING, AND STORAGE THROUGH THE APPROVED METHODS AND TECHNIQUES OF DOD AND DEPARTMENT OF TRANSPORTATION (DOT). PERSONNEL NOMINATED SHOULD MEET PREREQUISITES SET FORTH IN REF A.

3. IAW REF'S A AND B, REQ YOU SUBMIT PROPOSED CRS DATES AND CLASS

DLVR:CG SIXTH MAB(7)...ACT
DLVR:TWO TWO MAU(4)...ACT
DLVR:TWO SIX MAU(5)...ACT

TRNG(2)...ACT FOR CG MCB CAMP LEJEUNE(13) 01500/ 1/0030
BCOS(1) BEDO(1) BRSU(1) BSDO(1) CEOA(1) MANP(1) OICB(1) PERS(3)
RASC(1)

G-3(2)...ACT FOR CG II MAF(12) 01500/ 1/0162
ADJ(1) CEO(1) CFU(1) G-1(1) G-2(1) G-4(2) G-5(1) SOG(1) S-S(1)

RTD:000-000/COPIES:0041

SIZES TO THIS CMD NLT 5 OCT 1987.

4. POC THIS CMD IS WO ARMSTRONG/SSGT WILLIAMS AV 564-6309/6954 OR COMM (804) 444-XXXX.

BT

6240
NREAD
5 Oct 87

DAB
Surv'y Ecol.

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Base Motor Transport, Marine Corps Base, Camp Lejeune

Subj: CAUSTIC VAT AT BUILDING 1502

1. Method of disposal of contents of the vat (both liquid and solids), cannot be properly determined until Material Safety Data Sheet (MSDS) is received for review as requested by this office on 3 September 1987.

2. Please notify Mr. Sammy D. Gwynn, Natural Resources and Environmental Affairs Division, extension 2083, upon receipt of the MSDS.

J. I. WOOTEN

Copy to:
AC/S, FAC
AC/S, LOG, HMDO
(Attn: Capt Peters)
BMO, (Attn: Util Dir)

NREAD

6240
NREAD
OCT 0 2 1987

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Assistant Chief of Staff, Logistics, Marine Corps Base, Camp Lejeune

Subj: PROPER CONTAINERS AND RELATED PACKAGING FOR DISPOSAL OF USED LITHIUM BATTERIES

Ref: (a) BO 6240.5A
(b) EPA Onsite HW Inspection of 31 Mar - 1 Apr 87
(c) Resource Conservation and Recovery Act

Ecologist

1. Reference (a) requires that all hazardous waste (HW) be placed in Department of Transportation (DOT) approved containers while being collected for disposal. During reference (b), the Environmental Proteciton Agency (EPA) cited Camp Lejeune for failure to store the subject batteries in DOT approved containers. EPA's citation was based on the condition of the inventory of the subject batteries held at Building TP-451. Building TP-451 is operated by the Defense Reutilization and Marketing Officer (DRMO) under a HW permit issued pursuant to reference (c) by the North Carolina Division of Health Services (DHS).

2. Addressee is requested to take the lead in resolving this discrepancy. As a minimum the following action shall be taken:

a. In cooperation with appropriate officials involved in disposal of the subject batteries, develop and publish in message format concise specifications and guidance for the containerization and packaging of lithium batteries during collection and turn in to DRMO per reference (a) and applicable DOT regulations.

b. Immediately procure and stock (at appropriate supply points) containers and related supplies required to recontainerize/repackage existing inventories of the subject batteries at DRMO and approximately six months of anticipated generation based on DRMO records;

c. Ensure future availability of items listed in 1b above, and;

d. Coordinate the recontainerization/repackaging of all of the subject batteries in storage by DRMO which are not in containers meeting DOT regulations.

6240
NREAD

Subj: PROPER CONTAINERS AND RELATED PACKAGING FOR DISPOSAL OF USED LITHIUM BATTERIES

3. Addressee should coordinate the resolution of any problems, such as funding, arising during the implementation of the above corrective action. Please provide weekly progress reports to this office indicating anticipated date of completion of above action and any unresolved issues. Contact with EPA and DHS if required, should be coordinated with AC/S, Facilities.

4. Request your assistance in the courses of action outlined above. It is essential we have approved containers available no later than 1 December 1987.

5. Your point of contact in this matter is, Mr. Danny Sharpe, Natural Resources and Environmental Affairs Division, extensions 2083/1690.

T. J. DALZELL
By direction

Copy to:
SJA
DRMO

File

Julian
Good
Letter
DOS

6280/2
FAC
OCT 0 2 1987

Marine Corps Base, Camp Lejeune
Staff, Training and Operations
Staff, Logistics

NS

ection by U. S. Environmental Protection
of North Carolina, the disposal of
as hazardous waste disposal. Subsequent
to the inspection, representatives from Camp Lejeune accompanied by a representative from Headquarters Marine Corps (Major Creswell) met with State officials to further discuss this issue. During discussions, Major Creswell explained to the State that the disposal (burning or detonating) of munitions is exempt from the permitting requirements of the Resources Conservation and Recovery Act (RCRA). The State took a hard stance on this issue interpreting the regulations as meaning disposal is in fact authorized but a permit must be first obtained. The State conceded orally that disposal of munitions and bulk propellant pursuant to a bonafide training mission would be permissible without a permit, but the disposal of munitions for the purpose of mere disposal would require a permit.

2. For the interim until further resolution of this issue, the State agreed to accept telephonic requests for permits to dispose of munitions. In view of this pending issue and its impact on military training at Camp Lejeune, it is requested that you compile documentation concerning the disposal of munitions at Camp Lejeune. As a minimum, the document should show the following:

a. Where munitions are disposed.

b. How much and with what frequency munitions are disposed.

c. What types of munitions are disposed.

d. Under what circumstances is disposal of munitions a bonafide training function.

e. The methods of disposal with indications of the primary/secondary/tertiary methods.

f. The impact should Camp Lejeune not be permitted to dispose of munitions at Camp Lejeune.

file

6280/2
FAC
OCT 0 2 1987

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Assistant Chief of Staff, Training and Operations
Assistant Chief of Staff, Logistics

Subj: DISPOSAL OF MUNITIONS

1. During the recent inspection by U. S. Environmental Protection Agency (EPA) and the State of North Carolina, the disposal of munitions was noted by EPA as hazardous waste disposal. Subsequent to the inspection, representatives from Camp Lejeune accompanied by a representative from Headquarters Marine Corps (Major Creswell) met with State officials to further discuss this issue. During discussions, Major Creswell explained to the State that the disposal (burning or detonating) of munitions is exempt from the permitting requirements of the Resources Conservation and Recovery Act (RCRA). The State took a hard stance on this issue interpreting the regulations as meaning disposal is in fact authorized but a permit must be first obtained. The State conceded orally that disposal of munitions and bulk propellant pursuant to a bonafide training mission would be permissible without a permit, but the disposal of munitions for the purpose of mere disposal would require a permit.

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d. Under what circumstances is disposal of munitions a bonafide training function.

e. The methods of disposal with indications of the primary/secondary/tertiary methods.

f. The impact should Camp Lejeune not be permitted to dispose of munitions at Camp Lejeune.

JdW · Danny DDS File Haz Waste

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 7-8-87

TO:

BASE MAINT O
PUBLIC WORKS O
COMM-ELECT O
DIR., NAT. RESOURCES & ENV. AFFAIRS
DIR, FAMILY HOUSING
DIR, BACHELOR HOUSING
BASE FIRE CHIEF

ATTN: Mr Worten

1. Attached is forwarded for ~~info/~~action. Request you prepare memo to AC/S MC (Par 3) and prepare change to BO.

2. Please initial, or comment, and return all papers to this office.

Overcome by events. DDS

3. Your file copy.

BW Elston
By direction

"LET'S THINK OF A FEW REASONS
WHY IT CAN BE DONE"

MCBCL 5216/21 (REV. 04-85)

OFFICE OF THE STAFF JUDGE ADVOCATE
Marine Corps Base
Camp Lejeune, North Carolina 28542-5000

5090
SJA43
0 8 JUL 1987

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

Subj: BURNING OF MUNITIONS AS HAZARDOUS WASTE

Ref: (a) EPA Region IV Inspection report of 28Apr87
(b) Dir, Office of Solid Waste (EPA) ltr of 30Nov84
(c) CNO ltr 5090 Ser 451/5U392698 of 7Feb85

1. After the joint EPA/North Carolina DHS hazardous waste inspection of Marine Corps Base, Camp Lejeune which was conducted on 31 March and 1 April 1987, the EPA noted in reference (a) that Camp Lejeune was burning munitions, a form of hazardous waste disposal, without having obtained a required RCRA permit for such disposal.

2. After conducting research into this area, I am of the opinion that this "violation" was unwarranted. Liaison between this Office and the Base Explosive Ordnance Officer disclosed that munitions are in fact burned in open pits at authorized locations aboard the Base (G-10, K-2, K-326, G-4A). Such disposal, however, only involves munitions of calibers up to and including .50. Reference (b) is a letter from the Director of the Solid Waste Office at the Environmental Protection Agency (EPA) to the Director of the Air and Waste Management Division, EPA Region VIII. In reference (b), based on a study conducted by the Remington Arms Company, it was concluded that munitions less than an equal to .50 caliber were not "reactive" and therefore not a hazardous waste subject to the permit requirements of the Resource Conservation and Recovery Act. As reflected in reference (c), the guidance contained in the EPA internal memorandum was disseminated to all Naval Materiel Commands to assist in their coordination with Federal, State, and local hazardous waste control agencies. Although this guidance does not explicitly grant authorization for open pit burning of munitions less than or equal to .50 caliber, it suggests that the EPA inspector was incorrect in citing Camp Lejeune for this practice in the 28 April inspection report.

3. It is recommended that this issue be forwarded to Headquarters, U.S. Marine Corps (HQMC), for resolution with EPA. Liaison between this Office and Mr. Paul Hubbell, HQMC (LFL), disclosed that this is a problem of first impression in the Corps. Mr. Hubbell disclosed that this issue is currently being addressed between EPA and the Department of Defense. This issue also may have Corps-wide interest. Additionally, Mr. Ellison will likely remain the Region IV EPA inspector and he may be affronted by Camp Lejeune pointing out this error. All of the above point to HQMC being the logical choice for resolution of this question instead of local resolution.

4. In the interim, it is also recommended that you draft a Base order regarding the burning of munitions aboard Camp Lejeune which imposes EPA's internal policy upon EOD's practice. Such action may be sufficient to preclude the need for a RCRA permit for this activity, and submission of this order to EPA and the North Carolina Department of Human Services will demonstrate both good faith toward compliance and knowledge of permit requirements regarding munitions as a hazardous waste.

A. P. Tokarz

A. P. TOKARZ

4

76280/2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

APR 28 1987

4WD-WC

General J.E. Cassity
Commanding General
U.S. Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

RE: RCRA Hazardous Waste Inspection March 31 and April 1, 1987

Dear General Cassity:

On March 31 and April 1, 1987, an inspection was conducted to determine whether Camp Lejeune is in compliance with applicable RCRA requirements for a transporter, generator and the permitted storage area for hazardous waste. The enclosed report and checklist indicates that Camp Lejeune is not in compliance.

The violations identified during the inspection will be addressed under a separate letter by the State of North Carolina or this Agency. If you should have any questions, please contact David Ellison at 404/347-7603.

Sincerely yours,

John C. Lank, P.E., Chief
East Unit, Waste Compliance Section

Enclosure

cc: Gary Babb, North Carolina Solid & Hazardous Waste Mgmt. Branch

~~5 MAY 1987~~ 1 May 1987

Sir:
This is the after action report of our inspection by EPA. We will prepare a response to the letter which we expect soon from the State of N.C. No response required on this letter.
Respectfully,
T. J. Dalgell

- SJA
- FACILITIES
HELP!

MAY 1 1987

ROUTING AND TRANSMITTAL SLIP

Date 4/8/87

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Julian Wooten		
2.		
3.		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
X	As Requested		For Correction		Prepare Reply
	Circulate		For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

Attached is the guidance on open burning and detonation of waste explosives.

Any questions let me know

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Dave Ellison, USEPA	Phone No. FTS-257 (404) 347-7603

5041-102

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

* U.S.G.P.O.: 1983 -421-529/320

Johnson

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

RECEIVED

DEC 04 1984

AIR & HAZARDOUS MATERIALS DIVISION

30 NOV 1984

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

MEMORANDUM

SUBJECT: Classification of Small Arms Ammunition With Respect to Reactivity

FROM: John H. Skinner, Director
Office of Solid Waste (WH-562)

TO: David Wagoner, Director
Air & Waste Management Division
Region VIII

Recently, a question arose as to the status under RCRA of off-specification small arms ammunition (ball or sporting ammunition of calibers up to and including 0.50) intended for disposal. The issue concerned whether such wastes are "reactive wastes" within the meaning of 40 CFR 261.23(a)(6) and, therefore, subject to RCRA hazardous waste requirements. Because the ammunition contains an ignition source that may be shock and heat sensitive and is designed to generate high pressure during use, it had been our opinion that it is probably "reactive." However, on the basis of information that was received from the Remington Arms Company and the Army, we now conclude that such materials are not "reactive" within the meaning of 40 CFR 261.23 (a)(6).

Section 261.23 (a)(6) of Title 40 provides that a solid waste which is "capable of detonation or explosive reaction if it is subjected to a strong initiating source or if heated under confinement" is "reactive." As discussed in the May 19, 1980, preamble to 40 CFR 261.23, shock and thermal instability are important elements of this definition. While presently there is no Agency guidance regarding these criteria, the Remington Arms Company of Independence, Missouri, and the U.S. Army have provided information which addresses both of these factors.

Remington Arms Company submitted details on the effects of heat and impact to small arms ammunition. There was no explosion when a box of ammunition was set afire. Small arms, when subjected to the SAAMI (Sporting Arms and Ammunition Manufacturer's Institute) Impact Test, showed no evidence of mass propagation or explosion.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE JUN 4 1984

SUBJECT Tooele Army Depot

FROM Matthew A. Straus, Acting Chief Matt
Waste Identification Branch, (WH-562B)

TO Jon P. Yeagley, Chief
State Programs Section, (8AW-WM)

We have reviewed your submissions related to the Chemical Agents Munitions Disposal System facility. Our preliminary assessment of the properties of agents GB (isopropyl methyl phosphonofluoridate), VX (Ethyl-S-diisopropyl aminoethyl methyl phosphonothiodate), and HD (Bis-2-chloroethyl sulfide) lead us to conclude that the wastes should be considered hazardous due to their reactive nature. While the wastes are not specifically listed at this time, we believe them to be reactive according to the definition of §261.23(a)(4) -- namely, when mixed with water, they generate toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment. The gases of concern in each case are as follows: for GB, emissions of hydrogen flouride which has a TLV of 3 ppm in air; for HD, emissions of hydrogen chloride which has a TLV of 5 ppm; and for VX, emissions of diethyl methyl phosphonate, bis-ethyl methyl phosphonic acid and bis-S-(diisopropyl amino ethyl) methyl phosphonodithiolate. In the case of VX, the emitted gases are indicated as toxic decomposition products that would be emitted upon addition of VX to water. (The reference for these anticipated emissions is the Army's field manual on military chemistry.) Sufficient quantities of any of these chemical agents, when mixed with water, would be expected to emit gases at levels of concern and, thus, exhibit the characteristic of reactivity. In addition, mustard gas could meet the criteria in §261.23(a)(5), due to emissions of sulfides.

With respect to our ultimate plans vis-a-vis these wastes, we do expect to develop listings for all three agents. These listings would probably be developed under the criteria of §261.11(a)(2) and result in the designation of the wastes as Acute Hazardous Waste. Unfortunately, other priorities and a general dearth of available information will hinder our efforts and may result in the passage of considerable time before these listings are finalized. We are not overly concerned about this delay, however, since the State's letter suggests that these wastes are being managed in a manner consistent with their extreme toxicity. In addition, as we have stated above, the wastes are currently regulated. Nevertheless, it would be useful to our efforts if your group or the State agency could submit information on the wastes and the corresponding treatment and disposal options under discussion.

Do not hesitate to call Ben Smith (382-4791) of my staff if you require further information.

cc. Julia Bussey (T-2-2) Region IX

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 3 1985

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Mr. Carl J. Schafer, Jr.
Director
Environmental Policy
Acquisition and Logistics
Office of the Assistant Secretary of Defense
Washington, D.C. 20301

Dear Mr. Schafer:

In your letter of July 25, 1985, you requested EPA concurrence on the proposed DoD policy regarding the applicability of the RCRA hazardous waste regulations to the demilitarization of military munitions. These are munitions which have not yet been used and which now may be recycled or disposed. Your request raises two issues: 1.) are such military munitions subject to RCRA prior to demilitarization and 2.) can DoD directives be applied in lieu of RCRA requirements for treatment, storage, and disposal of hazardous waste?

Military Munitions Subject to RCRA

RCRA Section 6001 requires federal facilities to comply with all Federal, State, and local laws pertaining to the management of hazardous waste. RCRA hazardous waste regulations apply from the time and at the point that the material (e.g., military munitions) becomes a hazardous waste. The identification of munitions subject to RCRA must be based on the definition of solid and hazardous waste as presented in 40 CFR Part 261.

Under 40 CFR §261.33, unused commercial chemical products become hazardous wastes only when discarded or intended for discard. Recycling (i.e., use, reuse, or reclamation) is ordinarily not considered to be a form of discard. Similarly, unused munitions ordinarily would not be considered to be wastes unless and until there is an intent to dispose or destroy them, and they would not be wastes when recycled in lieu of disposal. We thus agree that the mere assignment of munitions to the Special Defense Property Disposal Account does not automatically subject munitions to RCRA. It is not until DoD decides to handle the material in a manner which classifies it as a hazardous waste that its storage and transportation must be in accordance with RCRA rules.

You should be aware, however, that burning of these munitions in military deactivation furnaces is considered to be incineration because the main purpose of the activity is waste treatment. Likewise, storage of these wastes prior to incineration would also be considered management of a hazardous waste.

The DoD strategy for identifying those munitions subject to RCRA appears to be in accordance with the RCRA regulations with the exception of the exclusion of hazardous waste storage. Your letter states that military munitions are never waste until demilitarization occurs. We interpret "demilitarization," as used in the DoD policy, to encompass all activities regulated under the RCRA rules except storage. Once there is an intention to dispose or destroy munitions, their storage as well as transportation would be regulated since they are hazardous waste. Therefore, the storage and transportation of military munitions that are hazardous waste are subject to RCRA prior to demilitarization.

RCRA Applicability to DoD

Your letter suggests that because DoD directives provide adequate protection of human health and the environment and "conform" to RCRA requirements, that DoD facilities may comply with DoD directives in lieu of the RCRA requirements. Our initial review of your directives indicates that in many respects, the DoD directives adequately address the corresponding RCRA requirements. However, we have also identified several deficiencies. For example, RCRA Subpart I §264.175 requires a containment system for container storage, whereas your directives do not. Under RCRA Subpart G §264.113, a closure plan is required for all hazardous waste facilities whether or not the facility plans to close. Your directives inaccurately state that this requirement does not apply.

Enclosed is a checklist which identifies all of the RCRA regulations promulgated prior to the Hazardous and Solid Waste Amendments of 1984 (HSWA or the "Amendments"). This checklist is used by the States during the State authorization review process to determine the equivalency of State standards to RCRA requirements. We believe the checklist will be useful to you, as a first step, to identify major omissions in the DoD directives when compared to EPA's "base" (pre-HSWA) program. Unlike State programs, however, the DoD directives must do more than achieve an equivalent level of environmental protection to EPA's program. DoD facilities must meet EPA's standards promulgated under RCRA, and thus the DoD Directives would need to be revised accordingly. We would be glad to help you determine whether specific parts of RCRA apply to DoD (e.g., closure requirements).

We are currently revising the checklist to reflect the Amendments and we should be able to provide a copy of the draft revised checklist in approximately one month. The Amendments will primarily require additions to the checklist; however, a few of the current provisions of the checklist may also need to be revised slightly. Please contact Chaz Miller (382-2220) of the State Programs Branch, Office of Solid Waste, with regard to the use of the checklist and its revisions.

We are confident that the final DOD directives will facilitate the permitting of DOD facilities and should reduce the need for authorized States to impose requirements other than those prescribed in your current directives.

Sincerely yours,

Jack W. McGraw
Deputy Assistant Administrator

Enclosure

Scotch® BRAND 7664 "Post-it" Routing-Request Pad

ROUTING - REQUEST 13 May 87

Please

- [ ] READ
- [ ] HANDLE
- [ ] APPROVE

and

- [ ] FORWARD
- [ ] RETURN
- [ ] KEEP OR DISCARD
- [ ] REVIEW WITH ME

Date _____

To Dan,

Can we make a change to Hq waste order to cover this?

From PJW

We are currently revising the checklist to reflect the Amendments and we should be able to provide a copy of the draft revised checklist in approximately one month. The Amendments will primarily require additions to the checklist; however, a few of the current provisions of the checklist may also need to be revised slightly. Please contact Chaz Miller (382-2220) of the State Programs Branch, Office of Solid Waste, with regard to the use of the checklist and its revisions.

We are confident that the final DOD directives will facilitate the permitting of DOD facilities and should reduce the need for authorized States to impose requirements other than those prescribed in your current directives.

Sincerely yours,

Jack W. McGraw
Deputy Assistant Administrator

Enclosure

North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

August 10, 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Colonel T.J. Dalzell
Assistant Chief of Staff, Facilities
United States Marine Corps Base
Camp Lejeune, North Carolina

Re: Compliance Order
United States Marine Corps Base - Camp Lejeune, NC6170022580

Dear Colonel Dalzell:

Enclosed is a Compliance Order issued to USMCB - Camp Lejeune, for certain violations of the North Carolina Solid Waste Management Act and rules, N.C.G.S. 130A, Article 9 (Act), and the North Carolina Hazardous Waste Management Rules, 10 NCAC 10F (Rules). The Compliance Order describes both the violations and the actions required for compliance at your facility with the Act and Rules.

In the past, the informal meetings have been productive in that the lines of communication have been improved. However, to ensure compliance with the Act and Rules in a timely manner, it is now necessary to issue the attached Compliance Order which contains a specific and detailed schedule for compliance. It is suggested that adherence to this compliance schedule by Camp Lejeune will avoid further enforcement action such as reconsideration of the current permitted status of the facility.

Pursuant to N.C.G.S. 130A-22(a), an administrative penalty of $30,000 is imposed on the Compliance Order. However, based on Meyer v. U.S. Coast Guard No.86-02-CIV-2 the penalty imposed is moot.

If you desire to schedule an informal conference to discuss the Compliance Order, please contact Dr. Carol Schiller, Branch Attorney, at (919) 733-2178.

Sincerely

William L Meyer

William L. Meyer, Head
Solid and Hazardous Waste Mgt. Branch
Environmental Health Section

WLM/pgb/6913A

cc: Central File
John Lank, EPA - Region IV
Gary Babb
Richard Gay
Carol Schiller
County Health Director

NORTH CAROLINA DEPARTMENT OF HUMAN RESOURCES
DIVISION OF HEALTH SERVICES
SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH

In Re: United States Marine Corps Base)
Camp Lejeune, North Carolina)
NC6170022580

COMPLIANCE ORDER
Docket # 87-493

PRELIMINARY STATEMENT

This Compliance Order is issued under the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9 (Act), and the North Carolina Hazardous Waste Management Rules, 10 NCAC 10F (Rules). William L. Meyer, Head, Solid and Hazardous Waste Management Branch, Department of Human Resources (the Branch), has been delegated the authority to implement the Act and Rules. United States Marine Corps Base, Camp Lejeune (hereinafter Camp Lejeune) is a United States Military installation which generates, treats, stores, and/or disposes of hazardous waste in Onslow County, North Carolina. Based upon an inspection performed at Camp Lejeune, the North Carolina Solid and Hazardous Waste Management Branch has determined that Camp Lejeune is in violation of certain requirements of the Act and Rules as set forth in this Compliance Order.

STATEMENTS OF FACT AND LAW

1. On December 18, 1980, the State of North Carolina, Solid and Hazardous Waste Management Branch, was authorized to operate the State RCRA Hazardous waste program under the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9, and rules codified at 10 NCAC 10F. William L. Meyer, Head of the Branch, has been delegated those responsibilities.

2. Camp Lejeune is a United States Military installation which owns and/or operates an existing hazardous waste treatment, storage and/or disposal facility, as defined in N.C.G.S. 130A-290(5) and 10 NCAC 10F .0002, in Onslow County, North Carolina. Camp Lejeune owns and/or operates a site generating hazardous waste as defined in N.C.G.S. 130A-290-7 and 10 NCAC 10F .0002 located at Onslow County, North Carolina. Camp Lejeune is a person as defined in N.C.G.S. 130A-290(12) and 10 NCAC 10F .0002.

3. On September 7, 1984, Camp Lejeune was issued a permit by the North Carolina Department of Human Resources to manage hazardous waste at the Onslow County, North Carolina facility in accordance with standards for owners or operators of hazardous waste management facilities set forth in 40 CFR 264 as adopted in 10 NCAC 10F .0032.

4. 40 CFR Part 264, codified at 10 NCAC 10F .0032, contains standards and requirements applicable to owners and operators of hazardous waste management facilities which have achieved permitted status. 40 CFR Part 262, codified at 10 NCAC 10F .0030, contains standards and requirements applicable to generators of hazardous waste.

5. On March 31, and April 1, 1987, a joint EPA/Branch inspection was made of the Camp Lejeune facility by David Ellison (US-EPA), Scott McPhiliamy (US-EPA) and Richard Gay, Waste Management Specialist (the Branch). The Camp Lejeune facility was found to be in violation of certain requriements contained in 40 CFR 262, and 264, codified at 10 NCAC 10F .0030, and .0032 respectively. Specifically:

A. 40 CFR 262.34(a), codified at 10 NCAC 10F .0030, states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:

(1) the waste is placed in containers and the generator complies with Subpart I of 40 CFR Part 265.

40 CFR 265.171 (Subpart I), codified at 10 NCAC 10F .0033 states that if a container holding hazardous waste is not in good condition or if it begins to leak, the owner or operator must transfer the hazardous waste from this container to a container that is in good condition or manage the waste in some other way that complies with the requirements of this part.

Camp Lejeune is in violation of 262.34(a)(1), codified at 10 NCAC 10F .0030 in that it did not transfer the contents of a dented container to a container that is in good condition at the generator site. (These hazardous wastes may be stored at the permitted storage area for more than 90 days.)

B. 40 CFR 262.34(a), codified at 10 NCAC 10F .0030 states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:

(3) While being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste."

Camp Lejeune is in violation of 262.34(a)(3), codified at 10 NCAC 10F .0030 in that it did not mark all its containers with the words "Hazardous Waste" at the generator site.

C. 40 CFR 262.34(a), codified at 10 NCAC 10F .0030 states that except as provided in paragraphs (d), (e), and (f) of this section, a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that:

(4) The generator complies with the requirements for owners or operators in Subparts C and D in 40 CFR Part 265 and with Section 265.16.

40 CFR 265.16(a)(1), codified at 10 NCAC 10F .0033, states that facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform

their duties in a way that ensures the facility's compliance with the requirements of this part. The owner or operator must ensure that this program includes all the elements described in the document required under paragraph (d)(3) of this section.

40 CFR 265.16(a)(2), codified at 10 NCAC 10F .0033, states that this program must be directed by a person trained in hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed.

40 CFR 265.16(c), codified at 10 NCAC 10F .0033, states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Camp Lejeune is in violation of 40 CFR 262.34(a)(4), codified at 10 NCAC 10F .0030, in that facility personnel have not completed a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facilitys compliance with the requirements of this part as specified by 40 CFR 265.16(a)(1), and personnel directing the program of training in hazardous waste management procedures have not been trained in those procedures as specified by 40 CFR 265.16(a)(2) and facility personnel previously trained have not taken part in an annual review of the intitial training required by paragraph (a) as specified by 40 CFR 265.16(c).

D. 40 CFR 264.16(c), codified at 10 NCAC 10F .0032, states that facility personnel must take part in an annual review of the initial training required in paragraph (a) of this section.

Camp Lejeune is in violation of 40 CFR 264.16(c), codified at 10 NCAC 10F .0032 in that facility personnel previously trained have not taken part in an annual review of the initial training required by paragraph (a) of this section at the storage area.

E. 40 CFR 264.74(a), codified at 10 NCAC 10F .0032 states that all records, including plans, required under this Part must be furnished upon request, and made available at all reasonable times for inspection, by any officer, employee, or representative of DHR who is duly designated by the Secretary.

Camp Lejeune is in violation of 40 CFR 264.74(a), codified at 10 NCAC 10F .0032 in that it could not provide upon request records required to be maintained by the Part B Permit.

F. 40 CFR 262.11, codified at 10 NCAC 10F .0030, states that a person who generates a solid waste, as defined in 40 CFR 261.2, must determine if that waste is a hazardous waste using the following method:

a. He should first determine if the waste is excluded from regulation under 40 CFR 261.4;
b. He must then determine if the waste is listed as a hazardous waste in Subpart D of 40 CFR Part 261.

Note: Even if the waste is listed, the generator still has an opportunity under 40 CFR 260.22 to demonstrate to the Administrator that the waste from his particular facility or operation is not a hazardous waste.

c. If the waste is not listed as a hazardous waste in Subpart D of 40 CFR Part 261, he must determine whether the waste is identified in Subpart C of 40 CFR Part 261 by either:

1. Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
2. Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

Camp Lejeune is in violation of 40 CFR 262.11, codified at 10 NCAC 10F .0030, in that it has not determined if the solid wastes it generates are hazardous wastes.

G. Permit condition - Part I F of the Part B Permit states that all amendments, revisions and modifications to any plan required by this permit shall be submitted to the Secretary of the Department of Human Resources for approval and permit modification.

Camp Lejeune is in violation of Permit Condition Part I F in that it failed to submit to the Secretary of the Department of Human Resources for approval and permit modifications changes in plans required by its permit.

H. Permit Condition - Part II L 3 of the Part B Permit states that the Base Fire Chief will, at least annually, review the contingency plan and the types of wastes located in the hazardous waste storage facility with representatives of the Naval Hospital and Base Provost Marshall.

Camp Lejeune is in violation of Permit Condition - Part II L 3, in that the Base Fire Chief does not annaully review the contingency plan and the types of wastes located in the hazardous waste storage facility.

I. Permit Condition - Part III C Management of Containers states that the permittee shall manage containers in accordance with 40 CFR 264.173 as adopted in 10 NCAC 10F .0032 and as described on page 25, Part D of the attachment.

40 CFR 264.173(b), codified at 10 NCAC 10F .0032, states that a container holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

Part D-1a(1) of the attachment, Description of Containers, states that containers used to store HM at the DPDO are either the original shipping container or a DOT-approved container, as listed in 49 CFR 100.

Camp Lejeune is in violation of Permit Condition Part III C and Permit Condition Part D-1a(1), in that containers of hazardous waste are not the original shipping container or a DOT-approved container, as listed in 40 CFR 100 and the containers are stored in a manner which may cause the containers to rupture.

J. 3005(a) of RCRA states that after the effective date of that part (i.e. Parts 270 and 124 of this chapter) the treatment, storage and disposal of hazardous waste is prohibited except in accordance with a permit.

Camp Lejeune is in violation of 3005(a) of RCRA in that its treatment of hazardous waste was not in accordance with a permit in that it is not permitted to treat any hazardous on site.

CIVIL PENALTY

N.C.G.S. 130A-22(a) and 10 NCAC 10G .0701-.0707 authorize an administrative penalty of up to $10,000 per day for each violation of the hazardous waste provisions of the Act and Rules. The N.C. Solid Waste Management Penalty Computation Procedure (March 19, 1985) was used to determine the penalty. Accordingly, a penalty of $30,000 is hereby imposed. The factors considered in determining the administrative penalty include, but are not limited to: the nature of the violations, the potential effect on the public health and environment, the degree and extent of harm caused by the violations, the costs of rectifying any damage, the types and amount of wastes, the ease and costs of compliance and the history of noncompliance.

CONDITIONS FOR CONTINUED OPERATION

Based upon the foregoing, Camp Lejeune is hereby ordered to take the following actions within 10 days of receipt of this Compliance Order to correct all violations as stated in this Compliance Order and otherwise be in compliance with the requirements of 40 CFR 262, 264, 265 and 270, codified at 10 NCAC 10F .0030, .0032, .0033 and .0034 respectively:

1. Comply with 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030. Camp Lejeune shall transfer the contents of any container of hazardous waste which is not in good conditon to a container which is in good condition.

2. Comply with 40 CFR 262.34(a)(3), codified at 10 NCAC 10F .0030. Camp Lejeune shall mark each container of hazardous waste with the words "Hazardous Waste."

3. Comply with 40 CFR 262.34(a)(4), codified at 10 NCAC 10F .0030. Camp Lejeune shall have all facility personnel complete a program of class room instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facilitys compliance with the

requirements of this part as specified by 40 CFR 256.16(a)(1). Personnel directing this program shall have received training in hazardous waste management procedures as specified by 40 CFR 265.16(a)(2). Personnel previously trained under the requirements of 262.34(a)(4) shall have taken part in an annual review of initial training as specified by 40 CFR 265.16 (c).

4. Comply with 40 CFR 264.16(c), codified at 10 NCAC 10F .0032. Facility personnel previously trained under the requirements of 40 CFR 264.16(a) shall have taken part in an annual review of initial training.

5. Comply with 40 CFR 264.74(a), codified at 10 NCAC 10F .0032. Camp Lejeune shall furnish upon request and make available at all reasonable times for inspection by any officer, employee, or representative of DHR who is duly designated by the Secretary all records required to be maintained by the Part B Permit.

6. Comply with 40 CFR 262.11, codified at 10 NCAC 10F .0030. Camp Lejeune shall determine if solid wastes it generates are hazardous waste.

7. Comply with Permit Condition Part I F of the Part B Permit. Camp Lejeune shall submit to the Secretary of the Department of Human Resources for approval and permit modification changes in plans required by its permit.

8. Comply with Permit Condition Part II L. 3 of the Part B Permit. The Base Fire Chief shall review the contingency plan and types of waste located in the hazardous waste storage facility with representatives of the Naval Hospital and Base Provost Marshall.

9. Comply with Permit Condition Part III C. and Permit Condition Part D-1a(1) of the Part B Permit. Camp Lejeune shall manage hazardous waste only in containers that are original shipping containers for that material or in a DOT-approved containers as listed in 49 CFR 100. These containers shall not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

10. Comply with 3005(a) of RCRA. Camp Lejeune shall treat, store, or dispose of hazardous waste only in accordance with a permit.

POTENTIAL CONSEQUENCES OF FAILURE TO COMPLY

Camp Lejeune is hereby advised that pursuant to N.C.G.S. 130A-22, each day of continued violation of any requirement of the Act or the Rules, constitutes a separate violation for which an additional penalty of up to $10,000 per day may be imposed. If the violation(s) continues, Camp Lejeune may also be subject to further enforcement including injunction from any further generation of hazardous waste and such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules. Permit Condition Part I D.1. of the Part B Permit states that the permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance is authorized by an emergency permit issued under 40 CFR 270.61 as adopted in 10 NCAC 10F .0034. Any permit noncompliance constitutes a violation of N.C. Hazardous Waste Management Rules

and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application.

OPPORTUNITY TO REQUEST A HEARING

Camp Lejeune has the right to request an administrative hearing to contest any matter of law, material fact, requirement, set forth in this Compliance Order. To request an administrative hearing, a written petition must be submitted upon receipt of this Compliance Order in accordance with N.C.G.S. 150B-23(a) and 10 NCAC 10G .0704.

The petition shall be verified or supported by affidavit and shall state facts tending to establish that the agency has deprived Camp Lejeune of property, has ordered Camp Lejeune to pay a fine or civil penalty otherwise substantially prejuiced Camp Lejeune's rights and that the Branch:

1. exceeded its authority or jurisdiction;
2. acted erroneously;
3. failed to use proper procedure;
4. acted arbitrarily or capriciously; or
5. failed to act as required by law or rule.

The petition must be submitted to the Office of Administrative Hearings, P. O. Drawer 11666, Raleigh, North Carolina 27604, in accordance with N.C.G.S. 150B-23(a). A copy of the petition must be submitted to Betty Turner, Agent, Department of Human Resources, 325 N. Salisbury Street, Raleigh, North Carolina 27611. Requested administrative hearings will be conducted in accordance with applicable rules contained in the North Carolina Administrative Code, a copy of which will be furnished to you upon request.

If compliance is not satisfied as required, the Secretary of Human Resources may request the Attorney General to commence injunctive action to achieve complinace pursuant to 130A-22(g).

INFORMAL CONFERENCE

Whether or not Camp Lejeune requests an administrative hearing, the Branch encourages an informal conference to discuss this matter and to give Camp Lejeune an opportunity to provide additional information, including any actions it has taken to correct the violation(s). If an informal conference is desired, please contact:

Dr. Carol M. Schiller, Branch Attorney
Solid and Hazardous Waste Management Branch
P. O. Box 2091, 306 N.Wilmington Street
Raleigh, N. C. 27602-2091
(919) 733-2178

THE SCHEDULING OF AN INFORMAL CONFERENCE WILL NOT RELIEVE CAMP LEJEUNE OF THE NEED TO FILE A WRITTEN PETITION FOR AN ADMINISTRATIVE HEARING WITHIN 30 DAYS OF RECEIPT OF THIS COMPLIANCE ORDER WITH ADMINISTRATIVE PENALTY.

By: William L. Meyer

William L. Meyer, Head
Solid & Hazardous Waste Management Branch
Division of Health Services
Department of Human Resources

Date: 9/11/87

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Compliance Order with Administrative Penalty to be served upon the person(s) designated below, at the last known address, by causing said copy to be deposited in the U. S. Mail, First Class (certified mail, restricted delivery, and return receipt requested, postage prepaid) in an envelope addressed to:

Colonel T.J. Dalzell
Assistant Chief of Staff, Facilities
United States Marine Corps Base
Camp Lejeune, North Carolina

Dated this 11th day of August, 1987.

William L Meyer

William L. Meyer, Head
Solid and Hazardous Waste Management Branch

6913A

6240
NREAD
1 Oct 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Distribution List

Subj: TRAINING FOR HAZARDOUS MATERIAL DISPOSAL OFFICERS AND HANDLERS

HMDC

Ref: (a) BO 6240.5A

Encl: (1) HMDO's for MCB

1. In accordance with the reference, a hazardous waste training program will be held for primary and alternate Hazardous Material Disposal Officer's, (HMDO's), on 14 October 1987. Handlers will attend class on 15 October 1987. Class schedule will be from 0830 - 1000 hours each day in the Base Safety Office Classroom, Building 1403, Hadnot Point area. HMDO's listed on the enclosure should make arrangements to attend. A list of handlers nominated for the training from each organization must be submitted to the Base Hazardous Material Disposal Coordinator no later than 8 October, 1987.

2. Point of contact is Mr. Sammy D. Gwynn, Natural Resources and Environmental Affairs Division, extensions 2083/1690.

C. D. PETERSON
Acting

Distribution:
MCES, HMDO
RR DET, HMDO
FMSSS, HMDO
MCSSS, HMDO
RSU, HMDO
ITS, HMDO
SUPBN, HMDO
HQBN, HMDO
AC/S, MWR, HMDO
AC/S, LOG, HMDO
BMO, HMDO
AC/S, FAC

HAZARDOUS MATERIAL DISPOSAL OFFICERS
MARINE CORPS BASE, CAMP LEJEUNE

NAME OF ORGANIZATION	HAZARDOUS MATERIAL DISPOSAL OFFICER PRIMARY	ALTERNATE
Natural Resources & Environmental Affairs Division	Sammy Gwynn Phone: 5003/2083 Bldg: 1103	Manuel Martin 5003/2083 1103
Marine Corps Engineer School	Maj Ferral Phone: 7570/7275 Bldg:	1stLt G L McNutt 7528/7233
Rifle Range Detachment	Capt O'Hara Phone: 7510 Bldg:	GySgt E E Taylor 7510
Field Medical Service School	Lt Rumbaugh Phone: 0826/0915 Bldg:	HM2 R Allen 0742/0892
Marine Corps Service Support Schools	1stLt R D Rule Phone: 0973/0839 Bldg: M131	MGySgt Beckley 0710/0738 M119
Reserve Support Unit	Capt M J Stroff Phone: 3144/1790 Bldg: 1403	GySgt Filipczuk 3144/1790
School of Infantry	WO F L Cote Phone: 0378 Bldg: TC-820	SSgt Gladden 0200
Support Battalion	MSgt D S Keifer Phone: 5247 Bldg: 1011	Sgt Amrine 5247 1011

HAZARDOUS MATERIAL DISPOSAL OFFICERS
MARINE CORPS BASE, CAMP LEJEUNE

NAME OF ORGANIZATION	HAZARDOUS MATERIAL DISPOSAL OFFICER PRIMARY	ALTERNATE
Headquarters Battalion	Capt Gander Phone: 3852 Bldg: 12	GySgt Crider 3852/1079 12
Assistant Chief of Staff, Morale, Welfare and Recreation	D Parker Phone: 2135/2537 Bldg:	Fred Schmitt 2106/5623 2819
Assistant Chief of Staff, Logistics	Capt Peters Phone: 2536 Bldg: 1116	Mrs. Arlene Waters 2536 1116
Base Maintenance Division	D K Bullock Phone: 5300 Bldg: 1202	S Marsicano 5307/3722 1202

6240
NREAD

30 Sep 87

Base Hazardous Material Disposal Coordinator, (HMDC), Natural Resources & Environmental Affairs Division, Marine Corps Base, Camp Lejeune
Hazardous Material Disposal Officer, (HMDO), Base Maintenance Division, Marine Corps Base, Camp Lejeune
Via: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune

CONTENTS OF ABOVE GROUND OIL TANK AT BUILDING M-625

Ref: (a) NREAD Memo 6240/2 NREAD of 11 Jun 87
(b) Resource Conservation and Recovery Act
(c) BO 6240.5A

1. Reference (a) advised that the oil in the above ground tank at Building M-625 be pumped into barrels and turned in to DRMO as hazardous waste (HW). On 25 September 1987, I inspected the subject oil tank and found the oil had not been turned in to DRMO as provided by reference (a).

2. Reference (b) states a generator may accumulate hazardous waste on-site for 90 days or less without a permit. The subject issue constitutes a violation of reference (b) in that the subject tank has not be permitted. It is requested that the subject waste be disposed of as soon as possible as a hazardous waste per reference (c).

SAMMY GWYNN

Copy to:
Dir, NREAD
Supvy Ecologist

6240
NREAD
30 Sep 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune

Subj: EPA HAZARDOUS WASTE (HW) REINSPECTION

DDS
Supvy Ecol.

Ref: (a) FONECON btwn Mr. Dave Ellison, EPA, Region IV, and Mr. D. Sharpe, NREAD, Camp Lejeune, of 25 Sep 87
(b) FONECON btwn Mr. Mack Henderson, NCDHS, and Mr. D. Sharpe, NREAD, Camp Lejeune, of 28 Sep 87
(c) SJA, Camp Lejeune MEMO 5800 SJA41 of 21 Sep 87

1. References (a) and (b) were conducted as directed by the Deputy Assistant Chief of Staff, Facilities in response to reference (c). During reference (a), Mr. Ellison advised that EPA would likely conduct the subject reinspection during or shortly after January 1988. During reference (b), Mr. Henderson advised that it was highly likely that the State's next reinspection would be at the same time as EPA's.

J. I. WOOTEN

File Haz Waste

NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS
Marine Corps Base
Camp Lejeune, North Carolina 28542

29 Sept 87
Date

From: Director
To: Dan DDS
Subj:

See attached

JLW

Glenée gls

return to JLW

UNITED STATES MARINE CO
EXPLOSIVE ORDNANCE DISPOSA
RANGE CONTROL
MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA 285

Sec
Make copy
NREA
BWE

RECEIVED
11 SEP 1987

ER TO:

EOD
10 Sep 1987

From: Explosive Ordnance Disposal Officer, MCB Camp Lejeune
To: Staff Judge Advocate, MCB Camp Lejeune
Via: (1) Range Control Officer 11 Sep 87
(2) AC/S Training and Operations JSC 11 Sep 87
(3) AC/S Facilities BWEl 9/17/87

Subj: NORTH CAROLINA EVIRONMENTAL PROTECTION AGENCY (EPA) REGULATIONS EFFECTING EXPLOSIVE ORDNANCE DISPOSAL (EOD) OPERATIONS.

Ref: (a) Telephone Con btwn Capt. Way and Mr. Wooten on 870909

1. During the Reference, I learned that a meeting took place between representatives of the EPA, Headquarters Marine Corps, and Mr. Wooten, in Raleigh, NC., on 870904.

2. At this meeting the subject of disposal of unserviceable ammunition was raised. Presently, it is believed by Mr. Wooten and myself that a state permit will be required in order to conduct future operations. Mr. Wooten informed me that guidance will be forthcoming from the EPA or CMC on this subject.

3. There are three (3) other areas of concern that should be addressed with the EPA.

a. Does disposal of explosive items recovered by EOD personnel, off base require a permit?

b. Is a permit required to transport explosive items that are recovered off base?

c. Ammunition fired into high explosive impact areas, that does not function as designed, is periodically cleared. This clearance involves countercharging the items with a small amount of C-4 High Explosives. Will a permit be required for this?

4. It is my understanding that the generator of the hazardous waste is resposible for obtaining the permit. In none of the situations above are EOD personnel the generators of the hazardous waste. Who will request these permits?

5. Assistance in obtaining interim guidance in the aforementioned areas would be greatly appreciated.

UNITED STATES MARINE CORPS
EXPLOSIVE ORDNANCE DISPOSAL
RANGE CONTROL
MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA 28542-5000

IN REPLY REFER TO:
4570
EOD
10 Sep 87

From: Explosive Ordnance Disposal Officer, MCB Camp Lejeune
To: Staff Judge Advocate, MCB Camp Lejeune
Via: (1) Range Control Officer 11 Sep 87
(2) AC/S Training and Operations JTC 11 Sep 87
(3) AC/S Facilities BWEl 9/17/87

Subj: NORTH CAROLINA EVIRONMENTAL PROTECTION AGENCY (EPA) REGULATIONS EFFECTING EXPLOSIVE ORDNANCE DISPOSAL (EOD) OPERATIONS.

Ref: (a) Telephone Con btwn Capt. Way and Mr. Wooten on 870909

1. During the Reference, I learned that a meeting took place between representatives of the EPA, Headquarters Marine Corps, and Mr. Wooten, in Raleigh, NC., on 870904.

2. At this meeting the subject of disposal of unserviceable ammunition was raised. Presently, it is believed by Mr. Wooten and myself that a state permit will be required in order to conduct future operations. Mr. Wooten informed me that guidance will be forthcoming from the EPA or CMC on this subject.

3. There are three (3) other areas of concern that should be addressed with the EPA.

a. Does disposal of explosive items recovered by EOD personnel, off base require a permit?

b. Is a permit required to transport explosive items that are recovered off base?

c. Ammunition fired into high explosive impact areas, that does not function as designed, is periodically cleared. This clearance involves countercharging the items with a small amount of C-4 High Explosives. Will a permit be required for this?

4. It is my understanding that the generator of the hazardous waste is resposible for obtaining the permit. In none of the situations above are EOD personnel the generators of the hazardous waste. Who will request these permits?

5. Assistance in obtaining interim guidance in the aforementioned areas would be greatly appreciated.

6. For any further information on EOD procedures or operations contact Capt. R. WAY at Ext. 0558/0382.

R. WAY

NAV 5216/144A (Rev. 8-81)
N 0107-LF-052-2320

DEPARTMENT OF THE NAVY

Memorandum

ATE: 29 Sep 87

OM: Supvy Chemist, EC & M Section, Environmental Branch, NREAD

O: Supvy Ecologist, Environmental Branch, NREAD

UBJ: SOIL SAMPLE FROM BATTERY STORAGE AT BLDG 902

1: (1) JTC Environmental Consultants, Rept # 86-673 (Table 1)

1. On 5 September 1986, Danny Becker, Tom Barbee and myself collected soil from the lot behind Bldg 902 where batteries had been stored upside down. EPA had objected to batteries being stored empty upside down because runoff from the batteries could contaminant the soil with metals.

2. The enclosure contains the analysis of the soil, sample #86-29. The pH was neutral. Only two metals were found, cadmium and lead, which indicates some runoff was contaminating the soil, however, the levels were below toxicity limits.

ELIZABETH BETZ

Copy to:
Dir, NREAD

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 9-11-86 Turnaround: routine

Date: 10/28/86 Report No. 406 to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 86-673 Table 1

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		pH							
MCBCL 86-29 9-5-86	12-3667	7.2							

NAVY SAMPLE ID	JTC SAMPLE ID	EP Tox Extraction							
		As ug/L	Ba ug/L	Cd ug/L	Cr ug/L	Pb ug/L	Hg	Se ug/L	Ag ug/L
MCBCL 86-29 9-5-86	12-3667	<150	<200	11	<10	70	<0.2	<200	<10

DDS

Glenene glw

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 9-24-87

TO:

BASE MAINT O

PUBLIC WORKS O

COMM-ELECT O

DIR., NAT. RESOURCES & ENV. AFFAIRS

DIR, FAMILY HOUSING

DIR, BACHELOR HOUSING

BASE FIRE CHIEF

ATTN: Mr Sharpe

1. Attached is forwarded for info/~~action~~. Copy provided N/S Logistics for action.

2. Please initial, or comment, and return all papers to this office.

3. Your file copy.

Haz Waste 9-28-87

File JdW

By dir

"LET'S THINK OF A FEW REASONS WHY IT CAN BE DONE"

MCBCL 5216/21 (REV. 04-85)

UNITED STATES MARINE CORPS
MARINE CORPS AIR STATION
NEW RIVER, JACKSONVILLE
NORTH CAROLINA 28545-5001

IN REPLY REFER TO:
6240
GSO
24 Sep 87

From: Commanding Officer, Marine Corps Air Station, New River
To: Commanding General, Marine Corps Base, Camp Lejeune, North Carolina

Subj: TRANSPORTATION OF HAZARDOUS WASTE

Ref: (a) BO 6240.5A
(b) CO, MCAS ltr 6280 GSO of 30 Jul 87
(c) CO, MCAS ltr 6280 GSO of 26 Aug 87
(d) Phonecon between Harold Norris, TMO, and Mary Wheat, this Command, on 16 Sep 87

Encl: (1) Listing of Hazardous Waste

1. Reference (a) assigns the responsibility of transportation of hazardous waste generated at this installation to the Assistant Chief of Staff, Logistics. References (b) and (c) requested the Defense Reutilization and Marketing Office (DRMO) to accept accountability and arrange transportation for hazardous wastes accumulated by our units, and provided nomenclature, quantity and accumulation start dates. Accountability was accepted by DRMO on 4 September 1987.

2. Transportation was scheduled for 17 September, however reference (d) advised that the forklift at the hazardous waste warehouse was not working and transportation could not be accomplished. Mrs. Wheat emphasized that the 90-day storage limitation had already been exceeded on numerous containers and several others would reach the limitation before the end of the month.

3. A listing of wastes needing transportation immediately or prior to 30 September is provided as enclosure (1). With the exception of one 55-gallon drum, all the containers are 10-gallons or less in size and do not require a forklift. Your assistance is requested in getting the wastes itemized in enclosure (1) removed from this installation as soon as possible. Point of contact at this Command is Mary Wheat, extensions 6506/6518.

V. L. McMINN
Acting

LISTING OF HAZARDOUS WASTE

Waste	Quantity	Accum Start Date
Trichlorotrifluoroethane	1 5-gal can	24 May 87
Trichlorotrifluoroethane	2 5-gal cans	28 May 87
Trichlorotrifluoroethane	1 5-gal can	12 Jun 87
Toluene/MIK	1 5-gal can	14 Jun 87
Methyle Ethyl Ketone	1 5-gal can	15 Jun 87
Alodine	1 5-gal can	15 Jun 87
Paint Remover	1 5-gal can	15 Jun 87
Paint Thinner	1 5-gal can	19 Jun 87
Toluene	1 10-gal can	22 Jun 87
Paint Remover	1 5-gal can	22 Jun 87
Trichlorotrifluoroethane	3 5-gal cans	23 Jun 87
Toluene/MIK	1 5-gal can	24 Jun 87
Petroleum Distillates	1 55-gal drum	30 Jun 87

Enclosure (1)

PRIORITY

P 282020Z SEP 87

FM CG MCB CAMP LEJEUNE NC//BLOG//

TO MCB CAMP LEJEUNE NC//S-4/MMO/MTO//

P 250202Z SEP 87

FM CMC WASHINGTON DC//LMA-3//

TO CG FMFPAC//G-3/G-4/CEO//
CGMCDEC QUANTICO VA
CG FOURTH MAW
CG MCB CAMP LEJEUNE NC
CG FOURTH MARDIV
CG MCLB BARSTOW CA
MARBKS GUANTANAMO BAY CU
COMMARCORBASESPAC CAMP H M SMITH HI
CG FMFLANT//G-3/G-4/CEO//
CG MCLB ALBANY GA
CG MCAGCC TWENTYNINE PALMS CA
CG MCB CAMP PENDLETON CA
CG MCB CAMP BUTLER JA

INFO CDRCECOM FT MONMOUTH NJ //AMSEL-SF-SEE//

UNCLAS //N04400//

SUBJ: ADDENDUM TO SAFETY ADVISORY, LITHIUM-SULFUR DIOXIDE (LI-SO2) BATTERIES

A. CMC WASHINGTON DC 140202Z SEP 87
B. CDR CECOM FT MONMOUTH NJ 041255Z SEP 87 NOTAL

1. REQUEST THAT LOT NUMBER 0287B BE ADDED TO THE LIST OF SUSPENDED FROM USE BATTERIES, LITHIUM-SULFUR DIOXIDE, BA-5590, NSN 6135-01-036-3495 LISTED IN PARA 5.A.(1) OF REF A. A BATTERY FROM THIS LOT VENTED WHILE UNDERGOING GOVERNMENT TESTING PER REF B.

2. THEREFORE, ALL BA-5590/U BATTERIES MANUFACTURED UNDER CONTRACT NUMBER DAAB07-85-C-H334, LOT NUMBERS 0287B, 0387B, 0387C AND 0387D ARE TO BE IMMEDIATELY SUSPENDED FROM USE.

3. ALL OTHER INSTRUCTIONS IN REF A REMAIN THE SAME.

4. POC THIS HQ IS J. MARTIN, LMA-3, AV 225-5963.

BT

BLOG(2)...ORIG FOR CG MCB CAMP LEJEUNE(117) /13/
BCOS(1) BSDO(1) OICB(1) CEOA(1) GSTF(12) SSTF(85) OCDR(14)

RTD:000-000/COPIES:0117

367436/271 1 OF 1 MATA0289 271/21:33Z 250202Z SEP 87
CSN:RXIA00017 CMC WASHINGTON

DDS
JDW
9-28-87

File Hz Waste

OFFICE OF THE STAFF JUDGE ADVOCATE
Marine Corps Base
Camp Lejeune, North Carolina 28542-5000

4510
SJA41

23 SEP 1987

From: Staff Judge Advocate, Marine Corps Base, Camp Lejeune
To: Director, Natural Resource and Environmental Affairs Division, Marine Corps Base, Camp Lejeune

Subj: NORTH CAROLINA HAZARDOUS WASTE HANDLING FEE

Ref: (a) Your memo of 14Sep87
(b) OASD memo of 4 June 1984

1. Pursuant to your request, reference (a), I have reviewed reference (b) and determined that Camp Lejeune should pay the annual North Carolina hazardous waste management fee. Using the criteria contained in the Office of the Assistant Secretary of Defense memorandum, reference (b), and based upon the particular facts of this fee as applied to those criteria, I am of the opinion that the fee constitutes a service charge and is not a tax.

2. Captain Dougherty of this Office learned from Mr. Edwards of the North Carolina Solid and Hazardous Waste Management Branch that the $1200 cost associated with Camp Lejeune being a storage facility is being deleted from the bill. Mr. Edwards related that Camp Lejeune will not be required to pay this fee because it is not a "commercial" generator of hazardous waste. Mr. Edwards stated a revised invoice is being sent to Camp Lejeune which indicates a total amount due as $1232.00. Accordingly, I recommend that payment be withheld until the corrected invoice is received.

M R McCarty

M. R. MCCARTY
Acting

OFFICE OF THE STAFF JUDGE ADVOCATE
Marine Corps Base
Camp Lejeune, North Carolina 28542-5000

4510
SJA41
SEP 9

From: Staff Judge Advocate, Marine Corps Base, Camp Lejeune
To: Director, Natural Resource and Environmental Affairs Division, Marine Corps Base, Camp Lejeune

Subj: NORTH CAROLINA HAZARDOUS/WASTE HANDLING FEE

Ref: (a) Your memo of 16 Sep 87
(b) OJSD memo of 4 June 1984

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R. R. MCCARTY
Acting

Copy Furnished
BMO 9-28-87
File Hg Waste
JLW

ICE OF THE STAFF JUDGE ADVOCATE
Marine Corps Base
ejeune, North Carolina 28542-5000

4510
SJA41

23 SEP 1987

Advocate, Marine Corps Base, Camp Lejeune
tural Resource and Environmental Affairs
rine Corps Base, Camp Lejeune

NA HAZARDOUS WASTE HANDLING FEE

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M R McCarty
M. R. MCCARTY
Acting

OFFICE OF THE STAFF JUDGE ADVOCATE
Marine Corps Base
Camp Lejeune, North Carolina 28542-5000

4510
SJA41

23 SEP 1987

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To: Director, Natural Resource and Environmental Affairs Division, Marine Corps Base, Camp Lejeune

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M R McCarty

M. R. MCCARTY
Acting

Charlie
Dave
Peter

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

PRIORITY

P 2318157 SEP 87

FM CG MCB CAMP LEJEUNE NC//BLOG//

TO CG II MAF//SUPO//
CG SIXTH MAB//SUPO//
MCAS NEW RIVER NC//G-4//
NAVDENCLINIC CAMP LEJEUNE NC//SUPO//
CG SECOND MARDIV//SUPO//
CG SECOND FSSG//SUPO//
NAVHOSP CAMP LEJEUNE NC//SUPO//
MCB CAMP LEJEUNE NC//SUPO//

UNCLAS //N04400//

SUBJ: DSSC INFORMATIONAL BULLETIN 15-87 (AVAILABILITY OF LEADED GASOLINE)

A. DEFENSE FUEL SUPPLY CENTER, CAMERON STATION, ALEXANDRIA, VA

LTR DFSC-01 OF 10 SEP 87 (NOTAL)

1. DUE TO THE PHASE DOWN OF LEAD IN GASOLINE ORDERED BY THE ENVIRONMENTAL PROTECTION AGENCY SEVERAL REFINERS HAVE GIVEN NOTICE TO DFSC THAT THEY HAVE STOPPED OR WILL STOP PRODUCTION OF ALL LEADED GASOLINE. THE REF STATES THAT CONTRACT COVERAGE FOR LEADED GASOLINE MAY NOT BE AVAILABLE FOR THIS ACTIVITY AFTER 1 JAN 1988.

2. ALL ADDRESSEES ARE REQUESTED TO REVIEW THEIR LEADED GASOLINE REQUIREMENTS AND CONVERT TO UNLEADED GASOLINE WHEREVER THE CAPABILITY EXISTS.

3. DSSC HAS VALIDATED ITS SUPPORT REQUIREMENTS FOR LEADED GASOLINE BASED ON CURRENT SALES AND WILL CONTINUE TO MONITOR SALES TO DETERMINE IF FURTHER ADJUSTMENTS TO REQUIREMENTS ARE NEEDED.

4. ADDRESSEES WHO HAVE KNOWN FUTURE REQUIREMENTS WHICH WOULD

DLVR:CG SIXTH MAB(7)...ACT
DLVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...ACT
DLVR:NAVHOSP CAMP LEJEUNE NC(4)...ACT

BLOG(2)...ORIG FOR CG MCB CAMP LEJEUNE(119) /13/
DSSC(1) SUPO(1) BCOS(1) BSDO(1) CEOA(1) OICB(1) OCOR(14) GSTF(12)
SSTF(85)

G-4(2)...ACT FOR CG II MAF(6) 04400/ 1/0078
CEO(1) CFU(1) SOG(1) S-S(1)

RTD:000-000/COPIES:0140

354275/266 1 OF 2 MATA0628 266/21:05Z 231815Z SEP 87
CSN:RXIA00106 CG MCB CAMP LE

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

RESULT IN INCREASED DEMAND FOR LEADED FUEL ARE REQUESTED TO REPORT THESE REQUIREMENTS TO THE OIC, DSSC NLT COB 28 SEP 87.

5. POINTS OF CONTACT ARE MAJ FISHER OR MR FINNEY, DSSC, TEL 451-5762 OR AV 484-5762.

BT

Haz Waste File

CLEANUP PROGRAMS

CERCLA	PAST HW SITES	40 CFR 300 (NCP)
RCRA	PERMITTED TSD SITES	DRAFT STRATEGY (14 OCT 86)
UST	UNDERGROUND STORAGE TANKS	PROPOSED RULES (FR, 17 APR 87)

RCRA CORRECTIVE ACTION PROGRAM

- THREE PHASES: FACILITY ASSESSMENT
  FACILITY INVESTIGATION
  CORRECTIVE MEASURES
- DRAFT STRATEGY (OCT 86)
- DRAFT RCRA FACILITY ASSESSMENT GUIDANCE (OCT 86)
- IR (DERA) COVERS PAST SITES/SWMUs, NOT CURRENT OPERATIONS

UST VS. CERCLA CLEANUP PROGRAMS

- O UST: INTENDED TO BE LESS COMPLEX, FASTER
- O CERCLA: FOR OLD AND/OR LARGE SITES
- O NAVY UST AND IR PROGRAMS ARE SEPARATE
- O IR INCLUDES INVESTIGATION

UST CORRECTIVE ACTION PROGRAM

- O PETROLEUM AND HAZARDOUS SUBSTANCE RELEASES
- O STAGE I. IMMEDIATE STEPS:
  - REPORTING
  - INITIAL ABATEMENT
  - FREE PRODUCT REMOVAL
  - SITE INVESTIGATION
- O STAGE II. LONGER-TERM ACTIONS:
  - RISK ASSESSMENT by State
  - CORRECTIVE ACTION PLAN
  - CLEANUP

DERA FUNDING FOR UST

ELIGIBLE:

TANKS NOT USED SINCE JAN 84
STUDIES TO LOCATE
CLEANUP OF CONTAMINATION

LEAKS PRIOR TO JAN 84
CLEANUP OF CONTAMINATION

INELIGIBLE:

CLEANUPS INCIDENTAL TO TANK REPLACEMENT
TESTING ACTIVE TANKS
REPLACING LEAKING TANKS
SPCC MEASURES

DERA MCON PROVISIONS

- MCON SCOPE
- ACTION REQUIRED BY CERCLA
- CAN'T WAIT
- 21 DAY NOTIFICATION

MCON DOCUMENTATION

- DD 1391 (W/35% ESTIMATE)
- PCR EXHIBIT
- JUSTIFICATION FOR DERA

DERA USE ON PROJECTS

- o EMERGING POLICY ISSUE
- o GREEN
  - CERCLA - REQUIRED CLEANUP
  - PRECEDES PROJECT
  - CLEANUP SITE >> PROJECT SITE
- o RED
  - REQUIRED BY CONSTRUCTION
  - INCIDENTAL TO PROJECT
  - RESULTS IN INCREMENTATION
  - MIXED FUNDING (O&M, MCON)
- o AMBER
  - MOST EVERYTHING ELSE

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 6-8-87

TO:

BASE MAINT O
PUBLIC WORKS O
COMM-ELECT O
DIR., NAT. RESOURCES & ENV. AFFAIRS
DIR, FAMILY HOUSING
DIR, BACHELOR HOUSING
BASE FIRE CHIEF

ATTN: Mr Worten

1. Attached is forwarded for ~~info/~~action. Request preparation of response for ACS Fac. signature, by 10 July 87.

2. Please initial, or comment, and return all papers to this office.

3. Your file copy.

By dir

"LET'S THINK OF A FEW REASONS
WHY IT CAN BE DONE"

MCBCL 5216/21 (REV. 04-85)

18 MAY 1987
ACTION: BFAC
Route original

DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
WASHINGTON, D.C. 20380-0001

IN REPLY REFER TO
628073
LFL/2-787
08 MAY 1987

From: Commandant of the Marine Corps

Subj: MARINE CORPS USAGE OF CHLOROFLUOROCARBONS, CHLOROCARBONS AND HALONS

Ref: (a) Clean Air Act

Encl: (1) Background Information on Potential Ozone Depleters
(2) Quantitative Information on Use of Halons
(3) Qualitative Information on Use of Potential Ozone Depleters Other Than Halons

1. The reference requires the Environmental Protection Agency (EPA) to regulate "potential ozone depleters" (PODs) which affect ozone in the stratosphere. Background information on these substances is provided as enclosure (1). EPA will announce its intent to regulate certain PODs on or about 1 May 1987 and develop and publish proposed regulations by 1 November 1987. The Marine Corps uses many PODs in performance of its missions. The regulations could severely impact some uses and require extensive controls or product changes. We must, therefore, take a proactive role in the development of national policy on PODs.

2. Participation in the development of this policy requires knowledge of Marine Corps POD usage. Toward this end, the Office of the Deputy Secetary of Defense (Environment) has provided forms (enclosures (2) and (3)) for completion by the Services. The information in these forms will be the basis for discussions with EPA regarding mission impacts of control and alternative regulatory strategies. Since stratospheric ozone depletion is a global problem, and because host nations overseas may begin control of POD's, the need for information includes Marine Corps activities both in the United States and in Japan.

3. Halons (enclosure (2)) have been singled out for more detailed quantitative information due to their potentially increased destructive effect on the ozone layer and their criticality to many fire supression systems. The data requested on the remaining PODs (enclosure (3)) is qualitative for now to allow the immediate identification of critical issues to EPA.

4. Development of data for enclosures (2) and (3) will require a coordinated effort by environmental, fire protection, supply, and maintenance personnel at the activity. Please forward your best

LFL/2-787

Subj: MARINE CORPS USAGE OF CHLOROFLUOROCARBONS, CHOROCARBONS AND HALONS

estimates on POD use to this Headquarters (LFL) by 15 July 1987. Our point of contact is Mr. Paul C. Hubbell (LFL) on autovon 227-1890.

E. R. ZAPTIN
By direction

Distribution:
CG FMFPAC
CG FMFLANT
CG MCDEC QUANTICO VA
CG MCB CAMP PENDLETON CA
CG 4TH MARDIV
CG MCRD ERR PARRIS ISLAND SC
CG MCRD WRR SAN DIEGO CA
CG MARCOR LOG BASE ALBANY GA
CG MCAS CHERRY POINT NC
CG MARCOR BASE CAMP LEJEUNE NC
CG MCAGCC/CG TWENTYNINE PALMS
CG MARCOR LOG BASE BARSTOW CA
CG MCAS EL TORO SANTA ANA CA
CG CAMP BUTLER/C/S MARCORBASESJAPAN
CO MCAS BEAUFORT SC
CO MCAS YUMA AZ
CO MCAS CAMP PENDLETON CA
CO MCAS TUSTIN CA
CO MCAS KANEOHE BAY HI
CO CAMP SMITH HI
CO MCAS FUTENMA JA
CO MCAS IWAKUNI JA
CO MCAS NEW RIVER NC

Copy to:
COMMARCORBASESPAC
COMCABEAST
COMCABWEST

BACKGROUND INFORMATION ON POTENTIAL OZONE DEPLETERS (PODs)

1. Chlorofluorcarbons (CFC), Chlorocarbons and Halon are three groups of chemicals which potentially deplete stratospheric ozone. Ozone is oxygen, but in an unusual form in which three instead of two oxygen atoms are linked together. Unlike ozone at the earth's surface which is associated with photochemical smog, a beneficial layer of ozone-enriched air exists between 6 and 30 miles above the earth. This band filters (absorbs) ultra violet (UV) radiation. As POD's rise into the ozone layer sunlight decomposes them, releasing the chlorine and bromine they contain. These act as catalysts in breaking the ozone molecule apart. At present enough UV radiation passes through the ozone layer to cause sunburn, and in some people, skin cancer. More UV radiation would significantly increase skin cancers, reduce agricultural yield, cause property damage, decrease aquatic productivity, and potentially warm the earth's atmosphere. The worst case predictions suggest such warming trends would change weather patterns and raise the level of the ocean due to melting polar ice.

2. Unlike more localized environmental issues, ozone layer modification is a global phenomenon which effects the well-being of every country in the world. Many nations have actively demonstrated their commitment to understand the processes which control atmospheric ozone, and its susceptibility to change because of human activities. National and international scientific agencies have implemented long-range research programs aimed at developing an organized, reliable body of knowledge of upper atmospheric processes while providing, in the near term, assessments of potential effects of human activities on the atmosphere.

3. The Administrator of the U.S. Environmental Protection Agency (EPA), has made a commitment to make a decision on the need for regulation of these substances in the Fall of 1987. Despite the complexities of developing a response that addresses all the issues and concerns surrounding the environmental risks of ozone depletion, he is committed to moving forward in a timely manner to address the issues. EPA has begun collecting data on POD production, usage, imports and exports as part of their decision to regulate and, if so, to what extent.

Encl: (1)

QUANTITATIVE INFORMATION NEEDED ON USAGE OF HALONS

Halon Type (1211 or 1301)	System/Use[1]	Aggregate Quantities for Each Intended System/Use (In 1000 lb Units) On Hand	Procured Per Year	Emitted[2] Per Year	Substitutes[3]	Emission[4] Controls	Detection[5] System(s)	Remarks[6]

NOTES ON HALON FORM

1. Make a specific entry for each intended class of uses for each Halon type. These include: (1) on board systems for aircraft, vehicles and/or ships; (2) crash and response vehicles; (3) hand-held units; (4) area systems for the following classes of facilities: a) computer, b) command, control and communication centers, c) trainers, and/or d) work/storage; (5) quantities held in reserve; and/or (6) other specific applications (identify).

2. Quantities emitted to the atmosphere are part of the intended system use, testing, training, servicing, and/or accidental releases or leaks.

3. Indicate chemical name of known (non-Halon) substitutes for the intended class uses.

4. Types of control equipment, recovery processes or other procedural or operational techniques to limit releases of Halons to the atmosphere.

5. For 1301 area systems, identify the detection, activation and/or procedural steps in place to minimize false discharges.

6. Remarks section should indicate if data came from a dedicated survey, existing records or are "best estimates." This section can also be used to refer to attachment on planned changes (increase/decrease) in Halon use, studies underway on process modification, etc.

In addition to information in the table, the following are also important to establishing a position:

- o Reports on the effectiveness of Halons for the intended use and comparison or findings on the effectiveness or deficiencies of substitute materials.

- o Evaluations or studies on the criticality of Halons for specific operational uses.

- o To the extent practicable, estimate future growth in procurement of Halons along existing use lines plus identify new or significant changes in requirements or needs of Halons (e.g., new weapon or support systems, new use area, etc., (format similar to the foregoing table may be used)).

QUALITATIVE INFORMATION USE OF POTENTIAL OZONE DEPLETERS (PODs) OTHER THAN HALONS

				Estimated Quantity (To the nearest 100 lb Units)					
Chemical[1]	Class[2]	Use[3]	On Hand[4]	Procured Per Year	Consumed[5] (Destroyed) Per Year	Emitted[6] Per Year	Disposal[7] Per Year	Substitute[8]	Remarks[9]

Encl (3)

NOTES ON POTENTIAL OZONE DEPLETERS
OTHER THAN HALON

1. Chemical name and formula.

2. POD Class (e.g., CFC or Chlorocarbon).

3. Specific end use or process(es) involvement.

4. Static quantities in systems, process tanks, or reserve storage.

5. Quantities consumed or destroyed (not emitted) as part of its use.

6. Quantities emitted to the atmosphere as part of the intended process, testing, training, and/or accidental releases, spills or leaks.

7. Quantities disposed due to expiration of shelf life or other signs of non-effectiveness.

8. Indicate chemical name of known (non-POD) substitutes for the intended use.

9. Remarks section should indicate if data came from a dedicated survey, existing records, or are "best estimates." This section can also be used to refer to attachments on planned changes (increase/decrease) in use, studies underway on process modifications, etc.

   a. Reports on the effectiveness of POD materials foddress the issues. EPA has begun collecting data on POD production, usage, imports and exports as part of their decision to regulate and, if so, to what extent.

Copy for Dany
given to
24 Sep 87

THE STAFF JUDGE ADVOCATE
Marine Corps Base
e, North Carolina 28542-5000

5800
SJA41
21 SEP 1987

TANT CHIEF OF STAFF, FACILITIES

ANAGEMENT PROGRAM; AFTER ACTION REPORT OF
CE WITH STATE OFFICIALS

Encl: (1) Capt Dougherty's memo 5800 SJA41 of 15Sep87

1. The enclosure is readdressed and forwarded for your information and action as deemed appropriate. I concur in all of the actions recommended in paragraphs 5a through 5g of Captain Dougherty's memorandum.

2. I invite your attention to recommendation 5d of the enclosure. DRMO is the organization which has the greatest need to document the steps being taken to remove the waste oil in order to provide the Command with a complete audit trail. Because DRMO is a subordinate office of the Defense Logistics Agency (DLA), the Commanding General lacks the authority to direct such action. Accordingly, I recommend that the Commanding General recommend that HQMC forward this concern to DLA, requesting that DLA issue appropriate orders to DRMO to effect the action recommended in paragraph 5d.

A. P. Tokarz
A. P. TOKARZ
Staff Judge Advocate

Copy to:
AC/S, Training
AC/S, Logistics
DRMO

FOR OFFICIAL USE ONLY

OFFICE OF THE STAFF JUDGE ADVOCATE
Marine Corps Base
Camp Lejeune, North Carolina 28542-5000

5800
SJA41
21 SEP 1987

FOR OFFICIAL USE ONLY

MEMORANDUM FOR THE ASSISTANT CHIEF OF STAFF, FACILITIES

Via: Chief of Staff

Subj: HAZARDOUS WASTE MANAGEMENT PROGRAM; AFTER ACTION REPORT OF INFORMAL CONFERENCE WITH STATE OFFICIALS

Encl: (1) Capt Dougherty's memo 5800 SJA41 of 15Sep87

1. The enclosure is readdressed and forwarded for your information and action as deemed appropriate. I concur in all of the actions recommended in paragraphs 5a through 5g of Captain Dougherty's memorandum.

2. I invite your attention to recommendation 5d of the enclosure. DRMO is the organization which has the greatest need to document the steps being taken to remove the waste oil in order to provide the Command with a complete audit trail. Because DRMO is a subordinate office of the Defense Logistics Agency (DLA), the Commanding General lacks the authority to direct such action. Accordingly, I recommend that the Commanding General recommend that HQMC forward this concern to DLA, requesting that DLA issue appropriate orders to DRMO to effect the action recommended in paragraph 5d.

A. P. Tokarz
A. P. TOKARZ
Staff Judge Advocate

Copy to:
AC/S, Training
AC/S, Logistics
DRMO

FOR OFFICIAL USE ONLY

OFFICE OF THE STAFF JUDGE ADVOCATE
Marine Corps Base
Camp Lejeune, North Carolina 28542-5000

5800
SJA41

SEP 15 1987

MEMORANDUM

From: Capt. C. E. Dougherty
To: Staff Judge Advocate

Subj: CONFERENCE WITH N.C. HAZARDOUS WASTE MANAGEMENT BRANCH OFFICIALS REGARDING CAMP LEJEUNE'S COMPLIANCE ORDER

Ref: (a) Compliance Order of 10Aug87 w/cover letter to AC/S Facilities
(b) CG ltr to Mr. Meyer of 3Sep87
(c) 40 C.F.R. 265.382

1. On Friday 4 September 1987, I traveled to Raleigh with Colonel Dalzell, Mr. Wooten, and Mr. Sharpe to discuss the compliance order issued by the State to Camp Lejeune with the State Hazardous Waste Management Branch officials. The State officials were: Mr. Gary Babb, Mr. Mac Henderson of the Department of Human Resources (Solid and Hazardous Waste Management Branch) and Ms. Jill Ledford of the N.C. Attorney General's Office. Maj. Creswell, HQMC (Code LFL) also attended most of the conference.

2. Purpose of the Trip: The representatives from Camp Lejeune had four goals to achieve. First, to demonstrate to the State Camp Lejeune's cooperation in complying with all hazardous waste laws and regulations. Second, to seek clarification of three of the violations noted by the State in its compliance order. These were:

a. The storage of lithium batteries
b. The disposal of munitions
c. Halogenated solvents in waste oil

Third, to impart knowledge of the Command's organization and the mission of the Base and its tenant commands with hopes that with such knowledge, the State would move towards a philosophy of "substantial compliance" versus strict compliance. Fourth, to impress upon the State that they have gained the attention of the Command, and that more drastic measures of enforcement were unnecessary.

3. Narrative Summary. After introducing all of the Camp Lejeune and HQMC personnel, Colonel Dalzell hand delivered a letter, reference (b), from the Commanding General which indicated that the Command was dedicated to achieving compliance with hazardous waste laws and regulations. Colonel Dalzell then asked for clarification of three issues raised by the compliance order.

a. Regarding the storage of lithium batteries (for which the Command was cited for improperly stacking greater than the height of two 55 gallon drums) the State officials had two points to make. First, the batteries must be stacked no higher than the height of 2 drums, regardless of whether they are stacked upon shelves (as we had done) or not. Second, the State alerted the Command that they consider our storage of lithium batteries in non-Department of Transportation (DOT) approved containers to be a violation. Presently, our batteries are stored in the crates made by PP and P personnel pursuant to DOD specifications. The State indicated that no violations would result if Camp Lejeune were to obtain a waiver from the State, or if Camp Lejeune were to obtain documentation from DOT stating that DOD specifications met DOT approval.

b. The issue of the disposal of munitions was discussed by Major Creswell. He explained to the State that reference (c), Code of Federal Regulations 265.382 exempts the disposal (burning or detonating) of munitions from the permitting requirements of RCRA. The State took a hard stance on this issue, interpreting the regulation as meaning disposal is in fact authorized, but a permit must be first obtained. The State conceded orally that disposal of munitions and bulk propellant pursuant to a bona fide training mission would be permissible without a permit, but the disposal of munitions for the purpose of mere disposal would require a permit.

c. The contaminated waste oil stored aboard Camp Lejeune was discussed. Mr. Sharpe explained in detail the steps his personnel took to identify the halogen identified in seven of the ten tanks aboard the facility which store waste oil. The State stated that no matter how low the concentration of freon in the waste oil, they considered all seven tanks to be hazardous waste. However, the State agreed to allow Camp Lejeune to store the waste for 90 days from the actual discovery that the waste oil contained the halogen. (Tuesday 1 September 1987). They would also be willing to entertain a request for a thirty day extension if Camp Lejeune could not dispose of all the oil within 90 days.

Colonel Dalzell attempted to ascertain whether the State would be seeking additional enforcement action to achieve Camp Lejeune's compliance. Mr. Babb stated that no further action would be taken by the State until the next EPA site inspection, and Mr. Babb was uncertain when that inspection would occur. He seemed confident that EPA would not be back to Camp Lejeune until after fiscal year 1988. After the conference adjourned, I spoke with Mr. Babb regarding the mention in the compliance order of revoking Camp Lejeune's permit, and whether Camp Lejeune would receive additional notice besides the compliance order should the State decide such action would be appropriate enforcement. He stated that he was unsure, because his office had never revoked a permit before, but he believed Camp Lejeune would receive additional notice and given an opportunity to correct the deficiencies. Mr. Babb also added that the mention of permit revocation was merely an "attention gainer" in that the State

knew that they were unable to levy administrative penalties against the Command.

4. Personal Comment:

a. I felt the informal conference was a success in that the State was willing to continue a dialogue with Camp Lejeune. I feel that all four objectives were met, most notably, the State was able to see, through Colonel Dalzell's able and credible presentation, that the Commanding General and Camp Lejeune are committed to implementing a successful hazardous waste management system. I also am encouraged that the State is beginning to view Camp Lejeune differently than other industrial and commercial generators and storers of hazardous waste. After the conference, Mr. Babb indicated that should the Command fare well on the next inspection, the State would be more inclined to only issue notice of violations instead of levying compliance orders. This concession indicates to me that the State may be understanding better Camp Lejeune's mission and how difficult it is for Camp Lejeune to balance mission completion and hazardous waste management and that substantial compliance may be a more realistic goal for the Command to achieve and the State to accept.

b. I did not get the impression that the State considered the conference to be a priority agenda item. I gleaned this from the dress of the officials (sport shirts; Mr. Babb did not wear a tie) and the fact that the Attorney General's representative was nearly ten minutes late. The State's apparent informal attitude highlighted to me that EPA has great influence over the State. When EPA attended the last informal conference with Camp Lejeune and the State, higher ranking officials from the State attended, the proceedings were more formal and less concessions were granted.

c. I feel that the next EPA inspection is critical. Camp Lejeune has a golden, one-time opportunity to demonstrate to the State and EPA that we are dedicated to hazardous waste management and that our program is in compliance. If Camp Lejeune units gear up and make the best effort they have made to date, and the inspectors see the improvements we have been lauding to them, I believe the State will merely issue notice of violations instead of compliance orders. But, we must make noticeable improvements for the inspectors to believe that our hazardous waste program has indeed "turned the corner".

5. Recommendations:

a. Assistant Chief of Staff, Facilities should probe EPA, Region IV to determine when the reinspection will occur.

b. Alert all commands to the forthcoming EPA reinspection in October 1987 and detail the significance of the inspection to the future of the Camp Lejeune hazardous waste management program. Continued violations will do nothing but exacerbate Camp

Lejeune/EPA/State relations and will probably result in a revocation of our permit. Insist upon maximum effort to take advantage of a unique opportunity.

c. As of the date of the informal conference, no funding appeared to be available with which to dispose of the halogen contaminated waste oil. Since that time, it is reported that $278,000 has been identified which can be made available to fund disposal of the waste oil. Should additional funds be needed and unavailable, a request for emergency funding should be forwarded to HQMC. Camp Lejeune has only 90 days with which to dispose of the oil, and if Camp Lejeune does not dispose of the oil in that time period, a serious violation will result. The State was extremely concerned the contaminated waste oil has been stored at Camp Lejeune for up to two years already.

d. All personnel and Staff Sections (AC/S Fac, SJA, Base Maintenance, AC/S Comptroller, DRMO) associated with resolving the disposal of the waste oil should keep a daily log which records their efforts each day during this 90 day period to dispose of the waste oil. Such a log will not only assist the Command should a thirty day extension be necessary, but it will also negate any criminal liability should the State aver that Camp Lejeune's noncompliance with storage regulations was deliberate and willful. The log should extend back to 1 September 1987, (the day the waste oil was deemed to be hazardous) because the Command has taken steps since that date to dispose of the oil (e.g., located $278,000.)

e. The Command should purchase DOT approved packaging containers in which our lithium batteries should be stored. Such action will result in the speediest compliance with the law. Requesting DOT approval of our DOD approved packaging crates may be done, however it will probably take much longer than it would take to buy containers already DOT approved. If a cost savings may be gained by using the PP & P containers which are DOD approved, perhaps DOT approval should be sought in the interim period during which the Command is waiting approval and is storing the batteries in the purchased DOT approved containers.

f. Assistant Chief of Staff, Training, Assistant Chief of Staff, Logistics and Assistance Chief of Staff, Facilities should immediately compile a Command document which illustrates where munitions are disposed; how much and with what frequency munitions are disposed; what types of munitions are disposed; under what circumstances is disposal of munitions a bona fide training function; the impact upon the Command should Camp Lejeune not be permitted to dispose of munitions at Camp Lejeune; the methods of disposal with indications of the primary/secondary/tertiary methods. Such a document needs to be assembled so that Camp Lejeune representatives may speak intelligently about the disposal of munitions in a hazardous waste context and to provide documentation should the Command need to obtain an emergency permit to conduct such operations.

g. The Assistant Chief of Staff, Facilities should request from the State their written concessions which were granted orally on 4 September 1987. Namely: (1) The 90 day grace period from 1 September 1987 for the temporary storage of the contaminated waste oil; (2) Their written interpretation of 40 CFR 265.382 regarding the open burning of munitions, and their granting Camp Lejeune the authority to dispose of waste explosives as long as it is pursuant to a legitimate training function; (3) Their sanction of DOD approved containers as acceptable containers for lithium battery storage should Camp Lejeune gain DOT approval of such DOD approved crates.

C E Dougherty

C. E. DOUGHERTY

6241/5
NREAD
17 Sep 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Base Maintenance Officer, Marine Corps Base, Camp Lejeune

Subj: TRANSFORMER OIL DISPOSAL; POLYCHLORINATED BIPHENYL (PCB) ANALYSIS RESULTS

Ref: (a) BO 6240.5

Encl: (1) IEA Report No. 304-015 of 21 Aug 87
(2) Transformer Oil Sample List

1. Enclosures (1) and (2) are provided for use in turn-in of used transformer oil to Defense Utilization and Marketing Officer, (DRMO). Enclosure (2) relates the sample number to the serial number. The sample number is also on the transformer.

2. Sample number 1752 refers to a transformer located at the Air Station that had no serial number on it.

3. The results indicate that none of the transformers had over 500 parts per million (ppm or mg/kg) PCB's. Three of the transformers had 50 to 499 ppm of PCB's which requires management as "PCB contaminated transformers". These three transformers should be turned in to DRMO and stored in the PCB storage building at Lot 140.

4. DRMO should be requested to take physical custody of the remaining transformers. Point of contact for this matter is Tom Barbee, NREAD, extension 5977.

C. D. PETERSON
Acting

Copy to:
DRMO (w/o Encls)

Blind copy to:
EC&MS (2)

August 21, 1987
IEA Report No. 304-015
Page 1

	Aroclor 1242 mg/Kg	Aroclor 1254 mg/Kg	Aroclor 1260 mg/Kg	Total Aroclors mg/Kg
1752		33		33
1753				<1.0
1754				<1.0
1755		5.1		5.1
1756			25	25
1757				<1.0
1758			7.8	7.8
1759			2.1	2.1
1760			2.4	2.4
1761			2.7	2.7
1762				<1.0
1763			2.3	2.3
1764			5.0	5.0
1765				<1.0
1766				<1.0
1767				<1.0
1768	14			14
1769	2.8			2.8
1770	3.5		3.4	6.9
1771			3.8	3.8
1772			4.5	4.5
1773				<1.0
1774				<1.0
1775		2.8		2.8
1776				<1.0
1777				<1.0
1778			210	210
1779		2.4		2.4
1780			100	100
1781			94	94
1782			15	15
1783				<1.0
1784				<1.0
1785				<1.0

ENCLOSURE (1)

ENVIRONMENTAL CHEMISTRY MICROBIOLOGY SECTION WORKSHEET

TRANSFORMER OIL SAMPLES

SAMPLE NUMBER	SERIAL NUMBER	BRAND	KVA	CAPACITY	SAMPLER	DATE
1753	HE02184	MAG	10	20	BETZ	23 July 87
1754	A2412A10AAF	W	10	20		
1755	101884	S	225			
1756	3151358	W	300	242		
1757	W87529		15			
1758	1817095	AC	135			
1759	6402547	W	37½			
1760	6402546	W	37½			
1761	6402548	W	37½			
1762	A721BA37XA	W	37½			
1763	6404345	W	75			
1764	6404343	W	75			
1765	161981	S	50			
1766	86A260806	W	15			
1767	A6512A75AA	W	75			
1768	6231975	ESCO	75			
1769	6231976	ESCO	75			
1770	6231974	ESCO	75			
1771	71231	S	75			
1772	71232	S	75			
1773	1590980A	W	37½			
1774	N10351	DS	75			
1775	1817097	AC	3	60		

BRANDS: Westinghouse(W), General Electric(GE), Standard(S), Kuhlman(K)
Delta Star(DS), Allis-Chalmers(AC), Line Material(LM)

ENCLOSURE 27

ENVIRONMENTAL CHEMISTRY & MICROBIOLOGY SECTION WORKSHEET

TRANSFORMER OIL SAMPLES

SAMPLE NUMBER	SERIAL NUMBER	BRAND	KVA	CAPACITY	SAMPLER	DATE
1776	78A383824	W	10		BETZ	23 July 87
1777	K161729Y71A	GE				
1778	57E10929	W	5			
1779	1809462	AC	5			
1780	57L11381	W	5			
1781	0171493	GE	30			
1782	6805290	GE	3			
1783	1473627	LM	75			
1784	1473629	LM	75			
1785	1473628	LM	75			

BRANDS: Westinghouse(W), General Electric(GE), Standard(S), Kuhlman(K)
Delta Star(DS), Allis-Chalmers(AC), Line Material(LM)

6240
NREAD
15 Sep 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune

Subj: HAZARDOUS WASTE

Ref: (a) FONECON btwn Maj Creswell, Attorney, HQMC and J. I. Wooten, NREAD on 14 Sep 87

1. During the reference, Major Creswell made the following comments/recommendations:

a. Lithium Batteries - Base should:

(1) Buy DOT approved boxes for lithium batteries now for immediate use.

(2) Get DOT approval for Marine Corps manufactured boxes.

(3) Seek ammendment to hazardous waste permit to use DOD manufactured boxes.

b. Waste Oil - Base should:

(1) Establish chronology of everything Base Maintenance and DRMO are doing to get rid of the hazardous waste oil in next 75 days. (Beginning 1 September 1987, State gave base 90 days to get rid of hazardous waste oil).

(2) There is some question at HQMC as to whether the base/DRMO will be able to move all of the oil in 90 days and if the State pursues court action details will be invaluable for any legal proceedings.

c. Ordnance disposal - Base should:

(1) Research the problems and determine:

(a) How much ordnance is being disposed at Camp Lejeune?

(b) How much ordnance is being used by EOD to train EOD personnel?

(c) Kind of ordnance being disposed at Camp Lejeune?

(d) Where aboard base is ordnance being disposed?

(e) How often is ordnance being disposed at Camp Lejeune?

(f) Who is disposing of ordnance at Camp Lejeune?

Subj: HAZARDOUS WASTE

(2) That Major Creswell was advised by Mr. Henderson, Division of Health Services, that it was likely that only one or two emergency permits (telephone request by base) would be approved by DHS to dispose of ordnance. This doesn't include legitimate EOD personnel training.

(3) Base has the option of not disposing of any ordnance until the new regulations are published and a state permit is obtained.

(4) Consider having Ms. Pam Clement, Ordnance Environmental Support Office, Naval Ordnance Station, Code 043B, Indian Head, Maryland, 20640-5000, AV 364-4534, 4450, visit Camp Lejeune and brief cognizant officials.

2. NREAD Recommendations:

a. It is recommended that Base Maintenance and DRMO document all actions/events pertaining to disposal of the hazardous waste oil. If court action is taken against the base, a complete chronology of events to show positive steps taken by the base will be very helpful (i.e., BMO/DRMO transactions, related telephone calls, oil pickup by contractor, funding issues, and unique events related to hazardous waste oil disposal at Camp Lejeune).

b. It is recommended DRMO be requested to provide the Assistant Chief of Staff, Facilities a hazardous waste oil removal schedule. Mr. Brinson DRMO advised on 15 September 1987 no hazardous waste oil had been removed from the Camp Lejuene/ New River Air Station Complex.

c. It is recommended that Training and Operations review all ordnance disposal activities aboard base, (including MCAS, Cherry Point, and other commands), covered by RCRA and related state regulations and provide information addressed in paragrpah 1c above.

d. It is recommended Ms. Clement be requested to visit Marine Corps Base, Camp Lejeune, and brief appropriate personnel on ordnance disposal and related environmental issues during the week of 5 - 9 October 1987.

6240
NREAD

Subj: HAZARDOUS WASTE

e. It is recommended Staff Judge Advocate be requested to develop the official chronology on the compliance order issues with input from cognizant personnel of the Assistant Chief of Staff, Training and Operations, Assistant Chief of Staff, Logistics, Traffic Management Officer, Assistant Chief of Staff, Facilities, Base Maintenance Officer, Natural Resources and Environmental Affairs Division, Commanding Officer MCAS, New River, 2d Marine Division, 2dFSSG and HQMC.

f. It is recommended Assistant Chief of Staff, Logistics initiate immediate action to procure DOT approved boxes for storage of lithium batteries.

J. I. WOOTEN

6240
NREAD
16 Sep 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Base Maintenance Officer, Marine Corps Base, Camp Lejeune

Subj: N. C. ANNUAL FEES BILLING FOR HANDLERS OF HAZARDOUS WASTE OF 1 SEPTEMBER 1987

Ref: (a) Discussion btwn Col Lilley, BMO, and J. I. Wooten, NREAD, on 11 Sep 87

(b) FONECON btwn Mr. Paul Hubbell, HQMC, and J. I. Wooten, NREAD, on 11 Sep 87

Encl: (1) N. C. Dept. of Human Resources, Div. of Health Services Memo of 1 Sep 87

1. During reference (a), Col Lilley raised a question about the subject bill being a tax by the State of North Carolina. State taxes and funds were the subject of discussion at the HQMC Facilities Conference of 17 - 21 August 1987.

2. During a review of relivant criteria with Mr. Hubbell during reference (b), it was concluded the fee assessed by the enclosure must be paid.

3. If I can be of further assistance, please advise.

J. I. WOOTEN

A 9/4

North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

September 1, 1987

MEMORANDUM

TO: North Carolina Generators; Transporters; and Treaters; Storers or Disposers (TSD's) of Hazardous Waste

FROM: R. J. Edwards, III, Compliance Officer
Solid & Hazardous Waste Management Branch
Environmental Health Section

SUBJECT: Annual Fees Billing for Handlers of Hazardous Waste

Effective January 1, 1986, all handlers of hazardous waste were required by administrative rule 10 NCAC 10C .0701 through .0704 to pay an annual fee. The above rules were adopted November 13, 1985 as authorized by G.S. 130A-29(a)(7) which was ratified August 12, 1987. A copy of the adopted rules is included with this billing.

The annual fee for FY 87-88 is due 30 days from the date of the attached invoice. The amount of your fee is included on the attached invoice. Checks should be made payable to the Division of Health Service, and mailed to R. J. Edwards, Compliance Officer, Solid and Hazardous Waste Management Branch, P.O. Box 2091, Raleigh, North Carolina 27602-2091.

IMPORTANT: THE FACILITY ID NUMBER MUST BE ON THE CHECK.

If you have any questions concerning this invoice, please call Jim Edwards at (919) 733-2178.

ENCLOSURE (1)

North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

SEPTEMBER 1, 1987

INVOICE
GENERATORS, TRANSPORTERS, TREATERS, STORERS, OR DISPOSERS (TSD'S)
OF HAZARDOUS WASTE

NC6170022580
US Marine Corps Base
Facilities Dept.
Camp LeJeune NC 28542

DESCRIPTION OF CHARGES	RATE	QTY. (TONS)	AMOUNT
GENERATOR OF HAZARDOUS WASTE			$600.00
WASTE GENERATED	$0.50	64	$32.00
STORAGE FACILITY			$1,200.00
TRANSPORTER OF HAZARDOUS WAS			$600.00
TOTAL AMOUNT DUE			$2,432.00

AMOUNT OF ANNUAL FEES DUE $2,432.00 AS REQUIRED BY ADMINISTRATIVE RULE 10 NCAC 10C .0701 THROUGH .0704 IS DUE (30 DAYS AFTER INVOICE DATE).

PLEASE MAKE CHECK PAYABLE TO: DIVISION OF HEALTH SERVICES

MAIL TO: R. J. EDWARDS
SOLID & HAZARDOUS WASTE MANAGEMENT BRANCH
P.O. BOX 2091
RALEIGH, NORTH CAROLINA 27602-2091

IMPORTANT: THE FACILITY ID NUMBER MUST BE ON THE CHECK. IF YOU HAVE ANY QUESTIONS CALL JIM EDWARDS AT (919) 733-2178.

Copy furnished Dan + Betty 9-16-87

File NPDES

UNITED STATES MARINE CORPS
Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

6280/2
FAC
SEP 11 1987

From: Assistant Chief of Staff, Facilities, Marine Corps Base
To: Staff Judge Advocate
Base Maintenance Officer
Director, Natural Resources & Environmental Affairs

Subj: PROPOSED NOTICE OF VIOLATION, NPDES PERMIT VIOLATION

Encl: (1) Dept of Natural Resources and Community Development ltr dtd 12 Aug 1987

1. The enclosure is forwarded for your information.

B. W. ELSTON
Acting

Pl A 31

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

August 12, 1987

Dear Permit Holder:

Subject: Notices of Noncompliance
NPDES Permit Violations

In the very near future this Division will begin generating Notices of Noncompliance for all NPDES permit violations. These notices will be based on the discharge information supplied to this Division on your self-monitoring reports.

These letters will be generated on a monthly basis and will be your official notice that you are considered in violation of your permit.

The purpose of this new procedure is to avoid long-term noncompliance situations which result in significant penalty assessments by the Division of Environmental Management. These letters should reinforce the need for you to take necessary remedial actions at your facility to avoid further agency actions.

If you receive a notice that is questionable or if you need assistance in addressing noncompliance problems, contact the appropriate NRCD regional office.

Sincerely,

R. Paul Wilms

R. Paul Wilms

6280
SJA41

Mr. William L. Meyer
Head, Solid and Hazardous Waste
Management Branch
Division of Health Services
North Carolina Department of Human Resources
P. O. Box 2091
Raleigh, North Carolina 27602-2091

Dear Mr. Meyer:

My Assistant Chief of Staff, Facilities, Colonel T. J. Dalzell, is in receipt of your letter dated 10 August 1987, including your compliance order attached thereto. I informed you in writing on 20 March 1987 that I was very concerned with the proper management of hazardous waste aboard Camp Lejeune. My concern has not diminished since that writing; in fact, your letter and its compliance order have heightened my interest on this issue.

Colonel Dalzell, along with my Natural Resources Director, Mr. J. I. Wooten, and a Judge Advocate, Captain C. E. Dougherty have arranged for an informal conference with Mr. Gray Babb of your staff and Ms. Jill Ledford of the Attorney General's Office to further discuss this issue. A representative from Headquarters, U. S. Marine Corps in Washington, D. C., Major L. L. Creswell, will also attend the meetng to share initiatives taken at the Department of Defense level relative to the management of hazardous waste.

I have been assured improvements have been made in our hazardous waste management program since the joint EPA/ North Carolina inspection conducted at Camp Lejeune on 31 March - 1 April 1987. Since that inspection, training deficiencies have been identified, broad measures have been implemented and others have been planned to enhance the existing hazardous training programs aboard the installation. The Base Order governing our hazardous waste management program has been distributed to all units aboard the Base, and, through an aggressive system of inspections, improvement is noted among most units.

I want to once again express my commitment to the proper management of hazardous waste aboard Camp Lejeune. It is Camp Lejeune's goal to comply with all the North Carolina hazardous waste laws and regulations. Although the waste oil and ordnance disposal issues may require assistance of higher headquarters to resolve, the violations identified during recent inspections can be corrected without your having to resort to further enforcement action. I can assure you that you have commanded my attention, and we are working as diligently as possible to addresss the deficiencies which you pointed out as existing with our program.

As you probably know, Camp Lejeune is the home of five major Marine Corps commands. Four of these commands, II Marine Amphibious Force, the 2d Marine Division, the 2d Force Service Support Group, and the 6th Marine Amphibious Brigade are elements of the Fleet Marine Force, Atlantic. Each of these commands

presently executes the mission assigned to the Marine Corps by Congress of deploying infantry Marines and combat service support units to all theatres of the world: the Persian Gulf, the Indian Ocean, the Middle East, the Caribbean Ocean, and the Far East. With such commitments to support, there is a tremendous turnover of personnel within these deployable Fleet Marine Force units assigned to this Base, and many are stationed here for very short periods of time before being deployed. Although compliance by a military organization is much more difficult than for an industrial organization which enjoys geographic and personnel stability, Camp Lejeune can meet the goal of complying with all hazardous waste laws and regulations and accomplish the Marine Corps mission at the same time. I realize that our hazardous waste management program is deficient in some areas, but we are striving for our goal. I expect that your inspectors will be encouraged by the efforts we have taken since the inspection and with your assistance and cooperation, Camp Lejeune will be in compliance with laws and regulations.

Sincerely,

J. E. CASSITY
Major General, U. S. Marine Corps
Commanding General

6280/2

6280
SJA41
SEP 0 3 1987

Mr. William L. Meyer
Head, Solid and Hazardous Waste
Management Branch
Division of Health Services
North Carolina Department of Human Resources
P.O. Box 2091
Raleigh, North Carolina 27602-2091

Dear Mr. Meyer:

My Assistant Chief of Staff, Facilities, Colonel T. J. Dalzell, is in receipt of your letter dated 10 August 1987, including your compliance order attached thereto. I informed you in writing on 20 March 1987 that I was very concerned with the proper management of hazardous waste aboard Camp Lejeune. My concern has not diminished since that writing; in fact, your letter and the compliance order have greatly heightened my interest concerning this critical matter.

Colonel Dalzell, along with my Natural Resources Director, Mr. J. I. Wooten, and a Judge Advocate, Captain C. E. Dougherty have arranged for an informal conference with Mr. Gary Babb of your staff and Ms. Jill Ledford of the Attorney General's Office to further discuss this issue. A representative from Headquarters, U.S. Marine Corps in Washington, D. C., Major L. L. Creswell, will also attend the meeting to describe initiatives taken at the Department of Defense level relative to the management of hazardous waste.

I have been assured improvements have been made in our hazardous waste management program since the joint EPA/North Carolina inspection conducted at Camp Lejeune on 31 March-1 April 1987. The Base Order governing our hazardous waste management program has been distributed to all units aboard the Base, and through an aggressive system of inspections, improvement is noted among most units. Since that inspection, training deficiencies have been identified and broad measures have been implemented and others have been planned to enhance the existing hazardous waste training programs aboard the installation.

I want to once again express my commitment to the proper management of hazardous waste aboard Camp Lejeune. It is Camp Lejeune's goal to comply with all the hazardous waste laws and regulations. Inasmuch as the violations noted during the most recent inspection pose no immediate physical danger to the environment and to personnel, they can be corrected by Camp Lejeune without your having to resort to further enforcement

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J. E. CASSITY
Major General, U.S. Marine Corps
Commanding General

6280/2

6280
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Management Branch
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Sincerely,

J. E. CASSITY
Major General, U.S. Marine Corps
Commanding General

NREAD

6240/1
NREAD
11 Sep 87

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commanding Officer, Marine Corps Air Station, New River, Jacksonville, North Carolina

Subj: ANALYSIS OF HAZARDOUS MATERIALS; RESULTS OF

Ref: (a) CO, MCAS, New River ltr 6280 GSO of 17 Oct 86
(b) BO 6240.5A
(c) CO, MCAS, New River ltr 6280 GSO of 4 Sep 87

Encl: (1) Table of Sample Numbers and EPA Hazardous Waste Numbers

1. As requested in reference (a), samples were taken of the 18 containers of unidentified materials from Marine Aircraft Group (MAG) 26, and MAG 29. The samples were numbered 87-01 through 87-18 and the containers were marked with the sample numbers. Ms. Barbara Coogle of the Ground Safety Office, Marine Corps Air Station, New River, (MCAS, NR), accompanied Base personnel during sampling, and is familiar with the location of each container. We have tenatively set re-sampling of container labelled Sample #87-04 for 21 Sep 87 if the MCAS, NR Hazardous Material Disposal Coordinator (HMDC) is unable to make hazardous waste determination based on information contained in the enclosure. The HMDC should request re-sampling by calling Ms. Elizabeth Betz, at extension 5977.

2. It should be noted the cost of contract laboratory support required to prepare the enclosure was approximately $9000. This cost could have been avoided if the units having the material had followed simple, prudent management measures, outlined in reference (b), (i.e., particularly proper marking and labelling of the container). Reference (b) and previous additions thereof published clear guidance and responsiblities for proper management and disposal of hazardous material. This has been a repeated problem of MAG 26 and MAG 29 and specific corrective action is indicated. Please advise of assistance required from this command in preventing reccurrence of similar discrepancies.

3. We agree with your concerns indicated by reference (c) regarding length of time required to provide information contained in the enclosure. Steps have been taken to correct this problem. In the future, laboratory support requests turn around time should be approximately 45-60 days. Point of contact on this matter is Danny D. Sharpe, NREAD at extensions 2083/1690.

JULIAN I. WOOTEN
By direction

TABLE OF SAMPLE NUMBERS AND EPA HAZARDOUS WASTE NUMBERS
(SEE NOTE 1) FOR MARINE CORPS AIR STATION, NEW RIVER

SAMPLE #	PRIMARY EPA HW #	SECONDARY EPA HW #
87-01	D001	D009
87-02	D001	
87-03	D001	
87-04	(See note 2)	
87-05	D010	
87-06	D001	D007, D010
87-07	D001	D007, D010
87-08	D006	
87-09	D001	D010
87-10	F001	
87-11	None	
87-12	D001	D006
87-13	D001	
87-14	D007	D004
87-15	D001	D006
87-16	D002	D010
87-17	F001	
87-18	F001	

Note #1: Based on information contained in attachments (A) and (B), primary and secondary (if applicable) Environmental Protection Agency (EPA) hazardous waste (HW) numbers have been determined. It is recommended that the information contained herein be reviewed with the generator to ensure that the HW numbers are consistent with their knowledge of the substance(s).

Note #2: Original sample volume insufficient for complete analysis. Reactivity test was not performed. If MCAS, NR unable to make a HW determination based on attached data, further testing is required.

Prepared by:

Elizabeth A. Bet
Signature

11 SEPTEMBER 1987
Date

ENCLOSURE (1)

Partial Results

REPORT # 539

LABORATORY ANALYSIS ON

NAVAL SAMPLES

(A/E CONTRACT N62470-84-B-6932)

JTC REPORT # 87-132

PREPARED FOR:

DEPARTMENT OF THE NAVY

ATLANTIC DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

NORFOLK, VA 23511

PREPARED BY:

JTC ENVIRONMENTAL CONSULTANTS, INC.

4 RESEARCH PLACE, SUITE L-10

ROCKVILLE, MARYLAND 20850

APRIL 22, 1987

Ann E Rosecrance

Ann E. Rosecrance
Laboratory Director

Attachment A

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

Date: 4-22-87 Report No. 539 to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 1

NAVY SAMPLE #	JTC SAMPLE ID	ANALYSIS PARAMETER							
		TOX ppm	Corrosivity pH	Flashpoint °C+	PCB ug/g				
87-01 top layer	12-4435	<100	*	65	<5				
87-01 bottom layer	12-4435	<500	*	35	**				
87-02	12-4436	<500	6.1	50	<5				
87-03	12-4437	<100	6.0	45	<5				
87-04	12-4438	340	10.9	not observed boiled at 70°	<5				
87-05 top layer (oil)	12-4439	200	*	70°	<5				
87-05 bottom layer (water)	12-4439	<500	7.0	not observed boiled at 100°	**				
87-06	12-4440	100	*	45	<5				
87-07	12-4441	<100	6.0	20	<5				
87-08	12-4442	<100	*	65	<5				
87-09	12-4443	<100	6.0	20	<5				
87-10	12-4444	5900	*	20	<5				
87-11	12-4445	<100	*	75	<5				
87-12	12-4446	100	*	45	<5				
87-13	12-4447	<500	5.9	55	<5				

* unable to do analysis due to sample matrix

+ level of confidence ± 5°C

** insufficient sample volume to do analysis

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

Date: 4-22-87 Report No. 539 to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 2

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		TOX ppm	Corrosivity pH	Flashpoint °C +	PCB ug/g				
87-14	12-4448	100	*	not observed boiled at 95°	<5				
87-15	12-4449	<100	*	35	<5				
87-16	12-4450	<100	13.0	not observed boiled at 60°	<5				
87-17	12-4451	370,000	*	20	<5				
87-18	12-4452	349,000	*	20	<5				

* unable to do analysis due to sample matrix

+ level of confidence ± 5°C

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

Date: 4-22-87 Report No. 539 to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 4

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		As ug/L	Ba ug/L	Cd ug/L	Cr ug/L	Pb ug/L	Hg	Se ug/L	Ag ug/L
87-01 top layer	12-4435	<2700	<760	<1500	<640	<2340	0.3 mg/kg	<860	<8920
87-01 bottom layer	12-4435	<1000	1930	260	540	990	5.3 ug/L	<1000	<100
87-02	12-4436	<2700	<760	<1500	<640	<2340	2.0 ug/L	<860	<8920
87-03	12-4437	<2700	<760	<1500	<640	<2340	<2.0 ug/L	<860	<8920
87-04	12-4438	NA	NA	NA	NA	NA	0.14 mg/kg	NA	NA
87-05 top layer (oil)	12-4439	<2700	1850	<1500	<640	<2340	<0.1 mg/kg	<860	<8920
87-05 bottom layer (water)	12-4439	<500	750	<25	3010	<250	<2.0 ug/L	3640	<50
87-06	12-4440	<1000	<500	80	7960	1750	**	4970	<100
87-07	12-4441	<500	<250	55	11,500	1210	<2.0 ug/L	6480	75
87-08	12-4442	<2700	1980	12,400	1080	<2340	<0.1 mg/kg	<860	<8920
87-09	12-4443	<1000	<250	50	1760	720	<2.0 ug/L	3620	<100
87-10	12-4444	<2700	3740	<1500	<640	<2340	<0.1 mg/kg	<860	<8920
87-11	12-4445	<2700	<760	<1500	<640	<2340	<0.1 mg/kg	<860	<8920
87-12	12-4446	<2700	10,800	1810	<640	<2340	0.1 mg/kg	<860	<8920
87-13	12-4447	<2700	<760	<1500	<640	<2340	2.7 ug/L	<860	<8920

* insufficient sample volume to do analysis

NA = not available, will be reported in separate addendum

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

Date: 4-22-87 Report No. 539 to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 5

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		As ug/L	Ba ug/L	Cd ug/L	Cr ug/L	Pb ug/L	Hg	Se ug/L	Ag ug/L
87-14	12-4448	6830	<250	<25	3940 mg/L	<250	<0.1 mg/kg	<570	<50
87-15	12-4449	<500	2590	1110	310	355	<0.1 mg/kg	<570	<50
87-16	12-4450	<500	<250	<25	135	<250	4.0 ug/L	1120	<50
87-17	12-4451	NA	NA	NA	NA	NA	NA	NA	NA
87-18	12-4452	NA	NA	NA	NA	NA	NA	NA	NA

NA = not available, will be reported in separate addendum

CASE # 539 Addendum

LABORATORY ANALYSIS ON

NAVAL SAMPLES

(A/E CONTRACT N62470-84-B-6932)

JTC REPORT # 87-132

PREPARED FOR:

DEPARTMENT OF THE NAVY

ATLANTIC DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

NORFOLK, VA 23511

PREPARED BY:

JTC ENVIRONMENTAL CONSULTANTS, INC.

4 RESEARCH PLACE, SUITE L-10

ROCKVILLE, MARYLAND 20850

JUNE 17, 1987

Ann E. Rosecrance

Ann E. Rosecrance
Laboratory Director

Attachment B

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

Date: 6-17-87 Report No. 539 Add to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 1

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		Reactivity							
		Cyanide ug/g	Sulfide ug/g						
87-01 top layer	12-4435	*	*						
87-01 bottom layer	12-4435	*	*						
87-02	12-4436	<10	<10						
87-03	12-4437	<10	<10						
87-04	12-4438	*	*						
87-05 top layer	12-4439	<10	<10						
87-05 bottom layer	12-4439	<10	<10						
87-06	12-4440	<10	<10						
87-07	12-4441	<10	<10						
87-08	12-4442	<10	<10						
87-09	12-4443	<10	<10						
87-10	12-4444	<10	<10						
87-11	12-4445	<10	<10						
87-12	12-4446	<10	<10						
87-13	12-4447	<10	<10						

* sample depleted, unable to do analysis

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

Date: 6-17-87 Case No. 539 Add. to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 2

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		Reactivity							
		Cyanide ug/g	Sulfide ug/g						
87-14	12-4448	613	<10						
87-15	12-4449	<10	<10						
87-16	12-4450	<10	<10						
87-17	12-4451	<10	<10						
87-18	12-4452	<10	<10						

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

Date: 6-17-87 Case No. 539 Add to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 4

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		As mg/kg	Ba mg/kg	Cd mg/kg	Cr mg/kg	Pb mg/kg	Hg mg/kg	Se mg/kg	Ag mg/kg
87-04	12-4438	<50	<100	<2.5	<5	<50	0.14	<50	<5

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

Date: 6-17-87 Case No. 539 Add. to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 5

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		As mg/kg	Ba mg/kg	Cd mg/kg	Cr mg/kg	Pb mg/kg	Hg mg/kg	Se mg/kg	Ag mg/kg
87-17	12-4451	<10	<10	<1	<0.75	<5	<0.1	<10	<1
87-18	12-4452	<10	<10	<1	4.2	<5	<0.1	<10	<1

JdW Dan J DPS

UNITED STATES MARINE CORPS
MARINE CORPS AIR STATION
NEW RIVER, JACKSONVILLE
NORTH CAROLINA 28545-5001

IN REPLY REFER TO:
6280
GSO
4 SEP 1987

From: Commanding Officer, Marine Corps Air Station, New River
To: Commanding General, Marine Corps Base, Camp Lejeune, North Carolina
(Attn: Director, Natural Resources and Environmental Affairs Division)

Subj: SAMPLING RESULTS

Ref: (a) CO, MCAS, NR ltr 6280 GSO of 17 Oct 86

1. The reference requested that samples be taken of 18 containers of unknown substances and that they be processed for identification of hazardous materials. Those samples were drawn by your staff chemists during early December 1986.

2. It is requested that this Command be officially advised of the status of the samples so that disposal action may be initiated to comply with time limitations. Point of contact is Mary Wheat, extensions 6506/6686.

B. D. Waddell
B. D. WADDELL

From: Commanding Officer, Marine Corps Air Station, New River
To: Commanding General, Marine Corps Base, Camp Lejeune, North Carolina
(Attn: Director, Natural Resources and Environmental Affairs Division)

Subj: CA/FLING REQUEST

Ref: (a) CO, MCAS, NR ltr 5280 CEO of 17 Dec 86

1. The reference requested that samples be taken of 12 containers of unknown substances and that they be processed for identification of hazardous materials. Those samples were drawn by your staff chemists during early December 1986.

2. It is requested that this Command be officially advised of the status of the samples so that disposal action may be initiated to comply with time limitations. Point of contact is Mary Wheat, extension 6206/6076.

R. D. WAGNER

JMW Dan DDS Glenee) For info - Nat Res - CL

UNITED STATES MARINE CORPS
Marine Corps Air Station
New River, Jacksonville
North Carolina 28545-5000

6280
GSO
4 SEP 1987

From: Commanding Officer, Marine Corps Air Station, New River
To: Commanding Officer, Marine Aircraft Group 26
Commanding Officer, Marine Aircraft Group 29

Subj: DISPOSAL OF HYDRAULIC CONTAMINATION TEST SAMPLES

Ref: (a) ASO 6280.1A

1. At this installation all squadron waste oil tanks are emptied and the contents stored in central collection tanks until it is sold to a contractor. Camp Lejeune has notified us that an analysis of the waste oil collected shows high levels of chlorinated hydrocarbons, believed to be a result of the freon and hydraulic fluids from the subject tests being deposited into waste oil tanks.

2. A small amount of freon (.1% of the total volume) can reclassify a 240 gallon tank of waste oil as a hazardous waste. Continuation of this practice could cause the state to determine us to be a treatment/storage/disposal facility and subject us to even more stringent controls than we already operate under.

3. It is imperative that action be immediately initiated to ensure that all squadrons properly segregate and dispose of test samples as hazardous waste. Reference (a) provides specific guidance on hazardous waste procedures.

4. For further information contact the Station Hazardous Material Disposal Manager, Mary Wheat, extensions 6506/6686.

B. D. WADDELL

ROUTINE

R 021935Z SEP 87

FM CG MCB CAMP LEJEUNE NC//BLOG//

TO MCB CAMP LEJEUNE NC

R 311527Z AUG 87

FM CG MCLB ALBANY GA//834//

TO AIG ONE ONE ONE NINE TWO AIG TWO EIGHT
AIG THREE EIGHT ZERO

UNCLAS //N04400//

SUBJ: CLARIFICATION OF CG MCLB ALB 211451Z AUG 87 (POTENTIAL HAZARD WHEN USING EATON DILL AIR VALVE CAPS: WS/EM ALERT NR 87-3-64

1. ONLY EATON DILL AIR VALVE CAPS (NSN 1650-00-222-4525) PURCHASED UNDER CONTRACT DAAE07-86-C-1388 ARE DEFECTIVE.

2. AIR CAPS THAT MEET ALL OF THE FOLLOWING CRITERIA WILL BE REPLACED THROUGH NORMAL SUPPLY CHANNELS.

   A. AIR CAPS IS YELLOW.

   B. HAS "DILL" STAMPED ON IT.

   C. AIR CAPS THAT CANNOT BE TRACED TO PURCHASE CONTRACT NUMBER.

3. AIR CAPS ~~THAT MEET A AND B ABOVE~~ THAT CAN BE TRACED TO ANOTHER PURCHASE CONTRACT NUMBER ARE CONSIDERED GOOD.

4. DEFECTIVE AIR CAPS WILL NOT DEADLINE VEHICLE.

5. POC FOR MCLB ALB IS GYSGT DICKENSON, CODE 834-2, ILSMF/ORD DIV AUTOVON 460-6586.

BT

BLOG(2)...ORIG FOR CG MCB CAMP LEJEUNE(119) /13/
BCOS(1) BSDO(1) OICB(1) CEOA(1) GSTF(12) SSTF(85) OCDR(14)
CONT(1) DSSC(1)

RTD:000-000/COPIES:0119

299985/245 1 OF 1 MATA0564 245/23:50Z 311527Z AUG 87
CSN:RXIA00072 CG MCLB ALBANY

File Hg Waste

A 9/6

North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

September 1, 1987

MEMORANDUM

TO: North Carolina Generators; Transporters; and Treaters; Storers or Disposers (TSD's) of Hazardous Waste

FROM: R. J. Edwards, III, Compliance Officer
Solid & Hazardous Waste Management Branch
Environmental Health Section

SUBJECT: Annual Fees Billing for Handlers of Hazardous Waste

Effective January 1, 1986, all handlers of hazardous waste were required by administrative rule 10 NCAC 10C .0701 through .0704 to pay an annual fee. The above rules were adopted November 13, 1985 as authorized by G.S. 130A-29(a)(7) which was ratified August 12, 1987. A copy of the adopted rules is included with this billing.

The annual fee for FY 87-88 is due 30 days from the date of the attached invoice. The amount of your fee is included on the attached invoice. Checks should be made payable to the Division of Health Service, and mailed to R. J. Edwards, Compliance Officer, Solid and Hazardous Waste Management Branch, P.O. Box 2091, Raleigh, North Carolina 27602-2091.

IMPORTANT: THE FACILITY ID NUMBER MUST BE ON THE CHECK.

If you have any questions concerning this invoice, please call Jim Edwards at (919) 733-2178.

North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director

SEPTEMBER 1, 1987

INVOICE
GENERATORS, TRANSPORTERS, TREATERS, STORERS, OR DISPOSERS (TSD'S)
OF HAZARDOUS WASTE

NC6170022580
US Marine Corps Base
Facilities Dept.
Camp LeJeune NC 28542

DESCRIPTION OF CHARGES	RATE	QTY. (TONS)	AMOUNT
GENERATOR OF HAZARDOUS WASTE			$600.00
WASTE GENERATED	$0.50	64	$32.00
STORAGE FACILITY			$1,200.00
TRANSPORTER OF HAZARDOUS WAS			$600.00
TOTAL AMOUNT DUE			$2,432.00

AMOUNT OF ANNUAL FEES DUE $2,432.00 AS REQUIRED BY ADMINISTRATIVE RULE 10 NCAC 10C .0701 THROUGH .0704 IS DUE (30 DAYS AFTER INVOICE DATE).

PLEASE MAKE CHECK PAYABLE TO: DIVISION OF HEALTH SERVICES

MAIL TO: R. J. EDWARDS
SOLID & HAZARDOUS WASTE MANAGEMENT BRANCH
P.O. BOX 2091
RALEIGH, NORTH CAROLINA 27602-2091

IMPORTANT: THE FACILITY ID NUMBER MUST BE ON THE CHECK. IF YOU HAVE ANY QUESTIONS CALL JIM EDWARDS AT (919) 733-2178.

T-6240

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 6/29/87

TO:

BASE MAINT O
PUBLIC WORKS O
COMM-ELECT O
DIR., NAT. RESOURCES & ENV. AFFAIRS
DIR, FAMILY HOUSING
DIR, BACHELOR HOUSING
BASE FIRE CHIEF

ATTN: Hay Mat'l Info

1. ~~Attached is forwarded for info/action.~~

Julian,
Do you feel this should be distributed to Safety, Fire, etc.?

2. Please initial, or comment, and ~~return all papers to this office~~.

If so, please do. I have some background info on SARA, but SJA has a complete set of these ref's.

V/R
Bob A

3. Your file copy.

"LET'S THINK OF A FEW REASONS
WHY IT CAN BE DONE"

SJA } furnished
BASE Safety } copy

MCBCL 5216/21 (REV. 04-85)

JOINT MESSAGE FORM

SECURITY CLASSIFICATION: UNCLASSIFIED

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BOOK: ADMIN

MESSAGE HANDLING INSTRUCTIONS

FROM: LANTNAVFACENGCOM NORFOLK VA

TO: ABL CUMBERLAND MD

ARMED FORCES EXPERIMENTAL TNG ACTY CAMP PEARY VA

FCTCLANT DAM NECK VA

HPDTA HERTFORD NC

INACTSHIPFAC PORTSMOUTH VA

LANTCOMOPSUPPFAC NORFOLK VA

MARCORB CAMP LEJEUNE NC

MARCORCRUITSTA LOUISVILLE KY

MARCORCRUITSTA RICHMOND VA

MARCORCRUITSTA SOUTH CHARLESTON WV

MARCORESTRACEN BALTIMORE MD

MARCORESTRACEN LYNCHBURG VA

MARCORESTRACEN RICHMOND VA

MARCORESTRACEN ROANOKE VA

MARCORESTRACEN SOUTH CHARLESTON WV

MCAS CHERRY POINT NC

MCAS NEW RIVER NC

NAVAVNDEPOT CHERRY POINT NC

NAVAVNDEPOT NORFOLK VA

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DISTR:

NAVGRAM

QUALIFIED BY: TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

P. A. RAKOWSKI, 5-2936, 1142, 1ac

SPECIAL INSTRUCTIONS

COPY: 09BS, 09RF, 11, 11S, 114, 114S

TYPED NAME, TITLE, OFFICE SYMBOL AND PHONE

R.D. CROWSON, DIR. UTIL. DIV., 4-9537

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE TIME GROUP: 1142/6 6/11/87

NAVGRAM

JOINT MESSAGE FORM

SECURITY CLASSIFICATION: UNCLASSIFIED

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02 OF 08				RR	UUUU				

MESSAGE HANDLING INSTRUCTIONS

FOOK ADMIN

FROM: NAS NORFOLK VA (2 CYS)

TO: NAS OCEANA VA

NAVCOMMSTA ROOSEVELT ROADS RQ

NAVHOSP CAMP LEJEUNE NC

NAVHOSP PORTSMOUTH VA

NAVMARCORESCEN LITTLE CREEK VA

NAVMARCORESCEN LOUISVILLE KY

NAVMARCORESCEN NEWPORT NEWS VA

NAVMARCORESCEN RICHMOND VA

NAVMARCORESCEN ROANOKE VA

NAVMARCORESCEN WHEELING WV

NAVORDSTA LOUISVILLE KY

NAVPHIBASE LITTLE CREEK VA

NAVRADSTA R SUGAR GROVE WV

NAVRADTRANSFAC DRIVER VA

NAVRESCEN BALTIMORE MD

NAVRESCEN CUMBERLAND MD

NAVRESCEN HUNTINGTON WV

NAVRESCEN LEXINGTON KY

NAVRESCEN PARKERSBURG WV

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APPROVER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

SPECIAL INSTRUCTIONS

NAVGRAM

JOINT MESSAGE FORM

SECURITY CLASSIFICATION: UNCLASSIFIED

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BOOK: ADMIN

MESSAGE HANDLING INSTRUCTIONS

FROM: NAVRESCEN SOUTH CHARLESTON WV

TO: NAVRESCEN STAUNTON VA

NAVSECGRUACT NORTHWEST VA

NAVSECGRUACT SABANA SECA RQ

NAVSHIPYD NORFOLK VA

NAVSTA NORFOLK VA

NAVSTA ROOSEVELT ROADS RQ

WPNSTA YORKTOWN VA

NSC NORFOLK CHEATHAM ANNEX VA

NSC NORFOLK VA

PWC NORFOLK VA

SUPSHIP NEWPORT NEWS VA

CNTT BAINBRIDGE MD

INFO CNO WASHINGTON DC (OP-45)

CINCLANTFLT NORFOLK VA

CMC WASHINGTON DC

CNET PENSACOLA FL

CHNAVPERS WASHINGTON DC

COMNAVAIRLANT NORFOLK VA

COMNAVAIRSYSCOM WASHINGTON DC

DISTR:

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

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NAVGRAM

JOINT MESSAGE FORM

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BOOK: ADMIN

MESSAGE HANDLING INSTRUCTIONS

FROM: COMNAVBASE NORFOLK VA

TO: COMNAVFACENGCOM ALEXANDRIA VA

COMNAVFORCARIB ROOSEVELT ROADS RQ

COMNAVOCEANSYSLANT NORFOLK VA

COMNAVSEASYSCOM WASHINGTON DC

COMNAVSECGRUCOM WASHINGTON DC

COMSUBLANT NORFOLK VA

COMNAVSUPSYSCOM WASHINGTON DC

COMNAVSURFLANT NORFOLK VA

COMNAVTELECOM WASHINGTON DC

COMTRALANT NORFOLK VA

NAVCAMS LANT NORFOLK VA

NAVMEDCOM WASHINGTON DC

NAVMEDCOMMIDLANTREG NORFOLK VA

NAVSAFCEN NORFOLK VA

NEESA PORT HUENEME CA

NAVENVIRHLTHCEN NORFOLK VA

NSC NORFOLK VA (CRANEY ISLAND FUEL TERMINAL)

SOUTHNAVFACENGCOM CHARLESTON SC

NORTHNAVFACENGCOM PHILADELPHIA PA

DISTR:

DRAFTER TYPED NAME TITLE OFFICE SYMBOL PHONE

SPECIAL INSTRUCTIONS

NAVGRAM

JOINT MESSAGE FORM

SECURITY CLASSIFICATION: UNCLASSIFIED

bob Alexander

TIME	MONTH	YR	ACT	INFO
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MESSAGE HANDLING INSTRUCTIONS

ADMIN

FROM: WESTNAVFACENGCOM SAN BRUNO CA

TO: PACNAVFACENGCOM PEARL HARBOR HI

CHESNAVFACENGCOM WASHINGTON DC

UNCLAS //N06280//

SUBJ: SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT (SARA) OF 1986, SUBTITLE A, SECTION 302 OF TITLE III, NATIONAL OIL AND HAZARDOUS SUBSTANCES POLLUTION CONTINGENCY PLAN (NCP): EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW

A. PHONCON COMNAVFACENGCOM (MR. BRIAN HIGGINS)/ LANTNAVFACENGCOM (MR. PAUL RAKOWSKI) OF 5 JUN 87

B. 40 CFR 300, SUBPART I-EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW, FEDERAL REGISTER, 12 DEC 86

C. 40 CFR PARTS 300 AND 365, NCP AND EMERGENCY PLANNING AND NOTIFICATION, FEDERAL REGISTER, 22 APR 87

D. DRAFT 40 CFR 370, HAZARDOUS CHEMICAL, REPORTING: COMMUNITY RIGHT-TO-KNOW, FEDERAL REGISTER, 30 JAN 87

1. WE HAVE RECEIVED VARIOUS INQUIRIES CONCERNING COMPLYING WITH INFORMATIONAL AND RELATED REQUESTS UNDER THE SUBJECT SECTION 302 OF SARA. WRITTEN POLICY GUIDANCE IS IN PREPARATION AT THE WASHINGTON LEVEL OF THE NAVY AND DOD. IN THE INTERIM, WE RECOMMEND THAT YOU

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MESSAGE HANDLING INSTRUCTIONS

FROM: ADMIN

RESPOND IN A POSITIVE AND CONCERNED MANNER AS OUTLINED BELOW TO FORMAL REQUESTS FROM ANY REGULATORY/STATE/LOCAL AGENCY. THIS INTERIM DIRECTION WAS CONFIRMED DURING REF A AND WILL BE MODIFIED WHEN FURTHER POLICY IS ISSUED.

2. SARA REQUIRES CERTAIN STATUTORY STEPS BE TAKEN BOTH BY EPA AND DESIGNATED STATE/LOCAL AGENCIES TO OBTAIN INFORMATION ON THE PRODUCTION, USE OR STORAGE OF 402 EXTREMELY HAZARDOUS SUBSTANCES. BOTH SARA, THE LAW, AND EPA'S REGULATIONS, REF B, CLEARLY EXCLUDE FEDERAL ACTIVITIES IN THE DEFINITION AS A PERSON SUBJECT TO THE REQUIREMENTS OF TITLE III OF SARA (SEE 40 CFR 300.92, DEFINITIONS). WE ANTICIPATE THAT THE FINAL POLICY TO BE ISSUED TO NAVY AND MARINE CORPS ACTIVITIES WILL MANDATE SUBSTANTIVE VOLUNTARY COMPLIANCE WITH TITLE III WITHOUT RELEASE OF ANY INFORMATION THAT WOULD VIOLATE OR COMPROMISE YOUR SECURITY INTERESTS. THE LIST OF THE 402 SUBSTANCES CAN BE FOUND IN REF C ALONG WITH THEIR THRESHOLD PLANNING QUANTITIES (ACTION/REPORTING LEVELS). A PROPOSED REPORTING/NOTIFICATION FORMAT WAS ISSUED BY EPA AS REF D.

3. WE RECOMMEND THAT YOU RESPOND IN WRITING TO ANY REQUESTS RECEIVED UNDER THE SUBJECT SECTION OF SARA AND INCLUDE THESE GENERAL STATEMENTS:

DISTR:

AUTHENTICATION: TYPED NAME, TITLE, OFFICE SYMBOL, PHONE	SPECIAL INSTRUCTIONS

NAVGRAM

JOINT MESSAGE FORM

SECURITY CLASSIFICATION: UNCLASSIFIED

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BOOK: ADMIN

MESSAGE HANDLING INSTRUCTIONS

FROM:

TO:

A. FEDERAL AGENCIES SUCH AS OURS ARE NOT STRICTLY REQUIRED TO COMPLY WITH TITLE III OF SARA. WE WERE NOT INCLUDED IN THE DEFINITION OF A PERSON IN EITHER SARA SECTION 329 OR 40 CFR 300.92 TO INSURE THAT INFORMATION DETRIMENTAL TO OUR SECURITY INTERESTS IS NOT RELEASED. HOWEVER, WE ARE A CONCERNED AND INVOLVED CITIZEN IN THE COMMUNITY AND WILL WORK WITH YOU TO MEET BOTH THE REQUIREMENTS AND INTENT OF SARA.

B. THE SCOPE AND EXTENT OF OUR VOLUNTARY COMPLIANCE WITH THE GOALS AND IDEALS OF SARA IS, UNFORTUNATELY, STILL IN THE DEVELOPMENT STAGE AT THE DOD LEVEL. THUS OUR ACTIVE AND DIRECT INVOLVEMENT IN THIS ISSUE IS IN A TEMPORARY HOLD STATUS UNTIL THIS POLICY IS RECEIVED.

C. WE WILL NOTIFY YOU JUST AS SOON AS THE POLICY IS RECEIVED. OUR COMMITMENT TO THE TITLE III REQUIREMENTS IS NOT TO BE ASSUMED TO BE NEGATIVE DUE TO THIS POLICY ABBERRATION. IF YOU ARE, OR WILL BE, DEVELOPING AREA/LOCAL EMERGENCY RESPONSE ORGANIZATIONS, WE WILL BE WILLING TO ATTEND AND DISCUSS WITHIN SECURITY LIMITATIONS AND TO THE BEST OF OUR CAPABILITY, OUR RESOURCES, MATERIALS STORED/USED, ETC., TO INSURE CONTINUITY OF YOUR INITIAL AND CONTINUING EMERGENCY AND PLANNING EFFORTS.

NOTE: PLEASE SEND COPIES OF ANY RESPONSES TO YOUR CHAIN OF COMMAND,

DISTR:

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

SPECIAL INSTRUCTIONS

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JOINT MESSAGE FORM

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BOOK: ADMIN

MESSAGE HANDLING INSTRUCTIONS

CNO (OP-45) AND YOUR AREA COORDINATOR, COMNAVFACENGCOM, CODE 112, AND THIS COMMAND, CODES 114 AND 09RF.

4. IF YOU REQUIRE FURTHER ASSISTANCE OR SUPPORT IN INITIAL MEETINGS WITH THE STATE OR LOCAL AGENCIES PERTAINING TO SARA TITLE III REQUIREMENTS, OUR POINT OF CONTACT IS MR. PAUL RAKOWSKI, AUTOVON 565-2936 OR (804) 445-2936.

DISTR:

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

SPECIAL INSTRUCTIONS

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MINISTRATIVE MESSAGE

UTINE

201901Z AUG 87 ZYB

CG MCB CAMP LEJEUNE NC

CMC WASHINGTON DC

FO CG SECOND MARDIV
II MAF
SIXTH MAB
VHOSP CAMP LEJEUNE NC
NTNAVFACENGCOM NORFOLK VA
B CAMP LEJEUNE NC

CG SECOND FSSG
HQ NUC II MAF
MCAS NEW RIVER NC
NAVDENCLINIC CAMP LEJEUNE NC
DRMO CAMP LEJEUNE NC

CLAS //N06280//
CTION 01 OF 03 //N06280//

C//CODEXLFL//LANTDIV FOR 2032//
BJ: HAZARDOUS WASTE MANAGEMENT PROGRAM, REPORT OF NOTICE OF
OLATION

MCO P11000.6B
CG MCB CAMLEJ NC 052154Z MAR 87

IN ACCORDANCE WITH REF A, THE FOLLOWING INFORMATION IS SUBMITTED
THE SUBJ MATTER. A COMPLIANCE ORDER, DOCKET NO. 87-493 WAS
SUED TO MARINE CORPS BASE, CAMP LEJEUNE, NC ON 11 AUG 1987,
CEIPTED BY THIS COMMAND ON 17 AUG 1987, FOR CERTAIN VIOLATIONS OF
E NORTH CAROLINA SOLID WASTE MANAGEMENT ACT AND RULES, N.C.G.S.
0A, ARTICLE 9 (ACT), AND THE NORTH CAROLINA HAZARDOUS WASTE
NAGEMENT RULES, 10 NCAC 10F (RULES).

VR:CG SIXTH MAB(7)...INFO
VR:NAVDENCLINIC CAMP LEJEUNE NC(4)...INFO
VR:NAVHOSP CAMP LEJEUNE NC(4)...INFO
VR:DRMO CAMP LEJEUNE NC(4)...INFO
VR:HQ NUC II MAF(7)...INFO

AC(2)...ORIG FOR CG MCB CAMP LEJEUNE(117) /13/
OICB(1) BCOS(1) BSDO(1) CEOA(1) GSTF(12) SSTF(85) OCDR(14)

4(1)...INFO FOR CG II MAF(3) / 8/0116
CFU(1) S-S(1)

RTD:000-144/COPIES:0146

264160/232 1 OF 7 MATA0504 232/20:58Z 201901Z AUG 87
N:RXIA00057 CG MCB CAMP LE

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2. PURSUANT TO N.C.G.S. &30A-22(A), AN ADMINISTRATIVE PENALTY OF $30,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE OF NORTH CAROLINA LETTER OF TRANSMITTAL, THEY ADVISED THAT BASED ON MEYER V. U.S. COAST GUARD NO. 86-02-CIV-2 THE PENALTY IMPOSED IS MOOT.

3. THE COMPLIANCE ORDER WAS ISSUED BASED UPON AN INSPECTION PERFORMED AT CAMP LEJEUNE BY REGION IV US EPA IN CONJUNCTION WITH NORTH CAROLINA SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH AT WHICH IT WAS DETERMINED THAT CAMP LEJEUNE IS IN VIOLATION OF CERTAIN REQUIREMENTS OF THE ACT AND RULES AS SET FORTH IN THE COMPLIANCE ORDER. THE CAMP LEJEUNE FACILITY WAS FOUND TO BE IN VIOLATION OF CERTAIN REQUIREMENTS CONTAINED IN 40 CFR 262, AND 264, CODIFIED AT 10 NCAC 10F .0030, AND .0032 RESPECTIVELY, SPECIFICALLY:

A. 40 CFR 262.34(A), CODIFIED AT 10 NCAC 10F .0030, STATES THAT EXCEPT AS PROVIDED IN PARAGRAPHS (D), (E) AND (F) OF THIS SECTION, A GENERATOR MAY ACCUMULATE HAZARDOUS WASTE ON-SITE FOR 90 DAYS OR LESS WITHOUT A PERMIT OR WITHOUT HAVING INTERIM STATUS, PROVIDED THAT:

(1) THE WASTE IS PLACED IN CONTAINERS AND THE GENERATOR COMPLIES WITH SUBPART I OF 40 CFR PART 265.

40 CFR 265.171 (SUBPART I), CODIFIED AT 10 NCAC 10F .0033 STATES THAT IF A CONTAINER HOLDING HAZARDOUS WASTE IS NOT IN GOOD CONDITION OR IF IT BEGINS TO LEAK, THE OWNER OR OPERATOR MUST TRANSFER THE HAZARDOUS WASTE FROM THIS CONTAINER TO A CONTAINER THAT IS IN GOOD CONDITION OR MANAGE THE WASTE IN SOME OTHER WAY THAT COMPLIES WITH THE REQUIREMENTS OF THIS PART.

CAMP LEJEUNE IS IN VIOLATION OF 262.34(A)(1), CODIFIED AT 10 NCAC 10F .0030 IN THAT IT DID NOT TRANSFER THE CONTENTS OF A DENTED CONTAINER TO A CONTAINER THAT IS IN GOOD CONDITION AT THE GENERATOR SITE. (THESE HAZARDOUS WASTES MAY BE STORED AT THE PERMITTED STORAGE AREA FOR MORE THAN 90 DAYS).

B. 40 CFR 262.34(A), CODIFIED AT 10 NCAC 10F .0030 STATES THAT EXCEPT AS PROVIDED IN PARAGRAPHS (D), (E) AND (F) OF THIS SECTION, A GENERATOR MAY ACCUMULATE HAZARDOUS WASTE ON-SITE FOR 90 DAYS OR LESS WITHOUT A PERMIT OR WITHOUT HAVING INTERIM STATUS, PROVIDED THAT:

(3) WHILE BEING ACCUMULATED ON-SITE, EACH CONTAINER AND TANK IS LABELED OR MARKED CLEARLY WITH THE WORDS, "HAZARDOUS WASTE."

CAMP LEJEUNE IS IN VIOLATION OF 262.34(A)(3), CODIFIED AT 10 NCAC 10F .0030 IN THAT IT DID NOT MARK ALL ITS CONTAINERS WITH THE WORDS "HAZARDOUS WASTE" AT THE GENERATOR SITE.

C. 40 CFR 262.34(A), CODIFIED AT 10 NCAC 10F .0030 STATES THAT EXCEPT AS PROVIDED IN PARAGRAPHS (D), (E) AND (F) OF THIS SECTION, A GENERATOR MAY ACCUMULATE HAZARDOUS WASTE ON-SITE FOR 90 DAYS OR LESS WITHOUT A PERMIT OR WITHOUT HAVING INTERIM STATUS, PROVIDED THAT:

(4) THE GENERATOR COMPLIES WITH THE REQUIREMENTS FOR OWNERS OR OPERATORS IN SUBPARTS C AND D IN 40 CFR PART 265 AND WITH SECTION 265.16.

40 CFR 265.16(A)(1), CODIFIED AT 10 NCAC 10F .0033 STATES THAT FACILITY PERSONNEL MUST SUCCESSFULLY COMPLETE A PROGRAM OF

ASSROOM INSTRUCTION OR ON-THE-JOB TRAINING THAT TEACHES THEM TO RFORM THEIR DUTIES IN A WAY THAT ENSURES THE FACILITY,S COMPLIANCE TH THE REQUIREMENTS OF THIS PART. THE OWNER OR OPERATOR MUST SURE THAT THIS PROGRAM INCLUDES ALL THE ELEMENTS DESCRIBED IN THE CUMENT REQUIRED UNDER PARAGRAPH (D)(3) OF THIS SECTION.

40 CFR 265.16(A)(2), CODIFIED AT 10 NCAC 10F .0033, STATES AT THIS PROGRAM MUST BE DIRECTED BY A PERSON TRAINED IN HAZARDOUS STE MANAGEMENT PROCEDURES (INCLUDING CONTINGENCY PLAN PLEMENTATION) RELEVANT TO THE POSITIONS IN WHICH THEY ARE PLOYED.

40 CFR 265.16(C), CODIFIED AT 10 NCAC 10F .0033, STATES THAT CILITY PERSONNEL MUST TAKE PART IN AN ANNUAL REVIEW OF THE INITIAL AINING REQUIRED IN PARAGRAPH (A) OF THIS SECTION.

CAMP LEJEUNE IS IN VIOLATION OF 40 CFR 262.34(A)(4), DIFIED AT 10 NCAC 10F .0030, IN THAT FACILITY PERSONNEL HAVE NOT MPLETED A PROGRAM OF CLASSROOM INSTRUCTION OR ON-THE-JOB TRAINING AT TEACHES THEM TO PERFORM THEIR DUTIES IN A WAY THAT ENSURES THE CILITIES COMPLIANCE WITH THE REQUIREMENTS OF THIS PART AS ECIFIED BY 40 CFR 265.16(A)(1), AND PERSONNEL DIRECTING THE PROGRAM TRAINING IN HAZARDOUS WASTE MANAGEMENT PROCEDURES HAVE NOT BEEN AINED IN THOSE PROCEDURES AS SPECIFIED BY 40 CFR 265.16(A)(2) AND CILITY PERSONNEL PREVIOUSLY TRAINED HAVE NOT TAKEN PART IN AN NUAL REVIEW OF THE INITIAL TRAINING REQUIRED BY PARAGRAPH (A) AS ECIFIED BY 40 CFR 265.16(C).

D. 40 CFR 264.16(C), CODIFIED AT 10 NCAC 10F .0032, STATES THAT CILITY PERSONNEL MUST TAKE PART IN AN ANNUAL REVIEW OF THE INITIAL AINING REQUIRED IN PARAGRAPH (A) OF THIS SECTION.

CAMP LEJEUNE IS IN VIOLATION OF 40 CFR 264.16(C), CODIFIED 10 NCAC 10F .0032 IN THAT FACILITY PERSONNEL PREVIOUSLY TRAINED VE NOT TAKEN PART IN AN ANNUAL REVIEW OF THE INITIAL TRAINING QUIRED BY PARAGRAPH (A) OF THIS SECTION AT THE STORAGE AREA.

E. 40 CFR 264.74(A), CODIFIED AT 10 NCAC 10F .0032 STATES THAT L RECORDS, INCLUDING PLANS, REQUIRED UNDER THIS PART MUST BE RNISHED UPON REQUEST, AND MADE AVAILABLE AT ALL REASONABLE TIMES R INSPECTION, BY ANY OFFICER, EMPLOYEE, OR REPRESENTATIVE OF DHR D IS DULY DESIGNATED BY THE SECRETARY.

CAMP LEJEUNE IS IN VIOLATION OF 40 CFR 264.74(A), CODIFIED 10 NCAS 10F .0032 IN THAT IT COULD NOT PROVIDE UPON REQUEST CORDS REQUIRED TO BE MAINTAINED BY THE PART B PERMIT.

F. 40 CFR 262.11, CODIFIED AT 10 NCAC 10F .0030, STATES THAT A RSON WHO GENERATES A SOLID WASTE, AS DEFINED IN 40 CFR 261.2, MUST TERMINE IF THAT WASTE IS A HAZARDOUS WASTE USING THE FOLLOWING THOD:

ADMINISTRATIVE MESSAGE

ROUTINE

R 201901Z AUG 87 ZYB

FM CG MCB CAMP LEJEUNE NC

TO CMC WASHINGTON DC

INFO CG SECOND MARDIV
CG II MAF
CG SIXTH MAB
NAVHOSP CAMP LEJEUNE NC
LANTNAVFACENGCOM NORFOLK VA
MCB CAMP LEJEUNE NC
CG SECOND FSSG
HQ NUC II MAF
MCAS NEW RIVER NC
NAVDENCLINIC CAMP LEJEUNE NC
DRMO CAMP LEJEUNE NC

UNCLAS
SECTION 02 OF 03 //N06280//

(1) HE SHOULD FIRST DETERMINE IF THE WASTE IS EXCLUDED FROM REGULATION UNDER 40 CFR 261.4;

(2) HE MUST THEN DETERMINE IF THE WASTE IS LISTED AS A HAZARDOUS WASTE IN SUBPART D OF 40 CFR PART 261.

NOTE: EVEN IF THE WASTE IS LISTED, THE GENERATOR STILL HAS AN OPPORTUNITY UNDER 40 CFR 260.22 TO DEMONSTRATE TO THE ADMINISTRATOR THAT THE WASTE FROM HIS PARTICULAR FACILITY OR OPERATION IS NOT A HAZARDOUS WASTE.

(3) IF THE WASTE IS NOT LISTED AS A HAZARDOUS WASTE IN SUBPART D OF 40 CFR PART 261, HE MUST DETERMINE WHETHER THE WASTE IS IDENTIFIED IN SUBPART C OF 40 CFR PART 261 BY EITHER:

(A) TESTING THE WASTE ACCORDING TO THE METHODS SET FORTH IN SUBPART C OF 40 CFR PART 261, OR ACCORDING TO AN EQUIVALENT METHOD APPROVED BY THE ADMINISTRATOR UNDER 40 CFR 260.21; OR

DLVR:CG SIXTH MAB(7)...INFO
DLVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...INFO
DLVR:NAVHOSP CAMP LEJEUNE NC(4)...INFO
DLVR:DRMO CAMP LEJEUNE NC(4)...INFO
DLVR:HQ NUC II MAF(7)...INFO

BFAC(2)...ORIG FOR CG MCB CAMP LEJEUNE(117) /13/
OICB(1) BCOS(1) BSDO(1) CEOA(1) GSTF(12) SSTF(85) OCDR(14)

G-4(1)...INFO FOR CG II MAF(3) / 8/0116
CFU(1) S-S(1)

RTD:000-144/COPIES:0146

(B) APPLYING KNOWLEDGE OF THE HAZARD CHARACTERISTIC OF E WASTE IN LIGHT OF THE MATERIALS OR THE PROCESSES USED.

CAMP LEJEUNE IS IN VIOLATION OF 40 CFR 262.11, CODIFIED AT 10 AC 10 .0030, IN THAT IT HAS NOT DETERMINED IF THE SOLID WASTES IT NERATES ARE HAZARDOUS WASTES.

G. PERMIT CONDITION - PART IF OF THE PART B PERMIT STATES THAT L AMENDMENTS, REVISIONS AND MODIFICATIONS TO ANY PLAN REQUIRED BY IS PERMIT SHALL BE SUBMITTED TO THE SECRETARY OF THE DEPARTMENT OF MAN RESOURCES FOR APPROVAL AND PERMIT MODIFICATION.

CAMP LEJEUNE IS IN VIOLATION OF PERMIT CONDITION PART I F IN AT IT FAILED TO SUBMIT TO THE SECRETARY OF THE DEPARTMENT OF HUMAN SOURCES FOR APPROVAL AND PERMIT MODIFICATIONS CHANGES IN PLANS QUIRED BY ITS PERMIT.

H. PERMIT CONDITION - PART II L 3 OF THE PART B PERMIT STATES AT THE BASE FIRE CHIEF WILL, AT LEAST ANNUALLY, REVIEW THE NTINGENCY PLAN AND THE TYPES OF WASTES LOCATED IN THE HAZARDOUS STE STORAGE FACILITY WITH REPRESENTATIVES OF THE NAVAL HOSPITAL D BASE PROVOST MARSHAL.

CAMP LEJEUNE IS IN VIOLATION OF PERMIT CONDITION - PART II L IN THAT THE BASE FIRE CHIEF DOES NOT ANNUALLY REVIEW THE NTINGENCY PLAN AND THE TYPES OF WASTES LOCATED IN THE HAZARDOUS STE STORAGE FACILITY.

I. PERMIT CONDITION - PART III C MANAGEMENT OF CONTAINERS ATES THAT THE PERMITTEE SHALL MANAGE CONTAINERS IN ACCORDANCE WITH CFR 264.173 AS ADOPTED IN 10 NCAC 10F .0032 AND AS DESCRIBED ON GE 25, PART D OF THE ATTACHMENT.

40 CFR 264.173(B), CODIFIED AT 10 NCAC 10F .0032, STATES AT A CONTAINER HOLDING HAZARDOUS WASTE MUST NOT BE OPENED, NDLED, OR STORED IN A MANNER WHICH MAY RUPTURE THE CONTAINER OR USE IT TO LEAK.

PART D-1A(1) OF THE ATTACHMENT, DESCRIPTION OF CONTAINERS, ATES THAT CONTAINERS USED TO STORE HM AT THE DPDO ARE EITHER THE IGINAL SHIPPING CONTAINER OF A DOT-APPROVED CONTAINER, AS LISTED 49 CFR 100.

CAMP LEJEUNE IS IN VIOLATION OF PERMIT CONDITION PART IIIC D PERMIT CONDITION PART D-1A(1), IN THAT CONTAINERS OF HAZARDOUS STE ARE NOT THE ORIGINAL SHIPPING CONTAINER OR A DOT-APPROVED NTAINER, AS LISTED IN 40 CFR 100 AND THE CONTAINERS ARE STORED IN MANNER WHICH MAY CAUSE THE CONTAINERS TO RUPTURE.

J. 3005(A) OF RCRA STATES THAT AFTER THE EFFECTIVE DATE OF THAT RT (I.E. PARTS 270 AND 124 OF THIS CHAPTER) THE TREATMENT, STORAGE D DISPOSAL OF HAZARDOUS WASTE IS PROHIBITED EXCEPT IN ACCORDANCE TH A PERMIT.

CAMP LEJEUNE IS IN VIOLATION OF 3005RA) OF RCRA IN THAT ITS EATMENT OF HAZARDOUS WASTE WAS NOT IN ACCORDANCE WITH A PERMIT IN AT IT IS NOT PERMITTED TO TREAT ANY HAZARDOUS ON SITE.

WITHIN 10 DAYS OF RECEIPT OF THE COMPLIANCE ORDER, 28 AUG 1987, RINE CORPS BASE, CAMP LEJEUNE MUST TAKE ACTION TO CORRECT ALL OLATIONS AS STATED IN THE COMPLIANCE ORDER. EACH DAY OF CONTINUED

VIOLATION OF ANY REQUIREMENT OF THE ACT OR RULES, CONSTITUTES A SEPARATE VIOLATION FOR WHICH AN ADDITIONAL PENALTY OF UP TO $10,000 PER DAY MAY BE IMPOSED. IF THE VIOLATION(S) CONTINUES, CAMP LEJEUNE MAY ALSO BE SUBJECTED TO FURTHER ENFORCEMENT INCLUDING INJUNCTION FROM ANY FURTHER GENERATION OF HW AND SUCH FURTHER RELIEF AS MAY BE NECESSARY TO ACHIEVE COMPLIANCE.

5. CORRECTIVE MEASURES IDENTIFIED IN PARAGRAPH 3 OF REF B HAVE BEEN COMPLETED. IN ADDITION, THE FOLLOWING SPECIFIC ACTIONS WERE TAKEN SUBSEQUENT TO THE 31 MAR-1 APR EPA INSPECTIONS:

A. CONTAINERS OF HW SPECIFICALLY ADDRESSED IN PARAGRAPH 3F ABOVE WERE EXAMINED, TESTED, AND A HW DETERMINATION MADE. ALL WASTE OIL BULK STORAGE TANKS HAVE BEEN TESTED AND A HW DETERMINATION IS BEING CONDUCTED.

B. ALL MEMBERS OF BASE ENVIRONMENTAL STAFF DIRECTLY INVOLVED IN HW MANAGEMENT HAVE BEEN PROVIDED FORMAL HW CLASSROOM TRAINING, FAR EXCEEDING REQUIREMENTS OUTLINED ABOVE.

C. FOURTEEN KEY STAFF MEMBERS WERE PROVIDED 40 HOURS OF FORMAL CLASSROOM TRAINING ON RESPONSE TO HM/HW SPILLS.

D. APPROXIMATELY 75 KEY PERSONNEL ARE SCHEDULED FOR FORMAL CLASSROOM TRAINING IN HW MANAGEMENT DURING THE WEEK OF 8-11 SEP 1987. THIS INCLUDES EXECUTIVE LEVEL PERSONNEL AS WELL AS FIRST LINE SUPERVISORS/MANAGERS.

E. THE BASE HW TRAINING COORDINATOR HAS BEEN SCHEDULED FOR A THREE DAY FORMAL SCHOOL ON DEVELOPMENT AND IMPLEMENTATION OF HW TRAINING PROGRAMS TO BE CONDUCTED AT NAVAL STATION, NORFOLK DURING THE WEEK ENDING 28 AUG 1987.

F. INTERNAL CAPABILITY TO PROVIDE MINIMAL LEVEL OF CLASSROOM TRAINING FOR HW HANDLERS IS BEING DEVELOPED.

6. TWO SIGNIFICANT ISSUES REMAIN AS FOLLOWS:

A. DURING THE INSPECTION USEPA NOTED THAT CAMP LEJEUNE WAS BURNING AND DETONATING MUNITIONS, A FORM OF HAZARDOUS WASTE DISPOSAL, WITHOUT HAVING OBTAINED A REQUIRED RCRA PERMIT FOR SUCH DISPOSAL. IF THIS POSITION IS SUSTAINED, IT WOULD HAVE SERIOUS ADVERSE IMPACT. RECOMMEND THAT THIS ISSUE BE ADDRESSED BETWEEN HQMC AND EPA DUE TO CORPS-WIDE IMPLICATIONS. SEE PARAGRAPH 4.J ABOVE.

B. DURING THE INSPECTION, EPA REQUESTED COPIES OF ANALYSIS OF CURRENT INVENTORIES OF WASTE OIL AWAITING DISPOSAL THROUGH DRMO. A REPORT IS CURRENTLY BEING PREPARED FOR SUBMITTAL TO EPA. TEST DATA INDICATES THAT HALOGEN CONTENT OF THE MAJORITY OF THE OIL EXCEEDS THE 1000 PART PER MILLION LIMIT (I.E., LEVELS ARE IN 1700-2500 PPM

BT

MINISTRATIVE MESSAGE

UTINE

201901Z AUG 87 ZYB

CG MCB CAMP LEJEUNE NC

CMC WASHINGTON DC

FO CG SECOND MARDIV
II MAF
SIXTH MAB
VHOSP CAMP LEJEUNE NC
NTNAVFACENGCOM NORFOLK VA
B CAMP LEJEUNE NC
CG SECOND FSSG
HQ NUC II MAF
MCAS NEW RIVER NC
NAVDENCLINIC CAMP LEJEUNE NC
DRMO CAMP LEJEUNE NC

CLAS
NAL SECTION OF 03 //N06280//

NGE). WHILE ONGOING EFFORTS HAVE BEEN MADE TO ELIMINATE DISPOSAL
REGULATED HALOGENATED SOLVENTS INTO WASTE OIL, WE MAY NOT BE ABLE
SUCCESSFULLY REBUTT EPA'S POSITION THAT OUR WASTE OIL IS A
GULATED HW. EPA TOOK THIS POSITION DURING THE INSPECTION, BASED
ANALYSIS OF OIL PREVIOUSLY DISPOSED OF BY CAMP LEJEUNE THROUGH
MO.

A COPY OF THE COMPLIANCE ORDER IS BEING FORWARDED VIA SEPARATE
RRESPONDENCE TO CODE LFL, ATTN: MR. PAUL HUBBELL.

VR:CG SIXTH MAB(7)...INFO
VR:NAVDENCLINIC CAMP LEJEUNE NC(4)...INFO
VR:NAVHOSP CAMP LEJEUNE NC(4)...INFO
VR:DRMO CAMP LEJEUNE NC(4)...INFO
VR:HQ NUC II MAF(7)...INFO

AC(2)...ORIG FOR CG MCB CAMP LEJEUNE(117) /13/
OICB(1) BCOS(1) BSDO(1) CEOA(1) GSTF(12) SSTF(85) OCDR(14)

4(1)...INFO FOR CG II MAF(3) / 8/0116
CFU(1) S-S(1)

RTD:000-144/COPIES:0146

NREAD
28 Aug 87

6240
NREAD
AUG 31 1987

Mr. Willian Meyer, Head
Solid and Hazardous Waste
Management Branch
N. C. Department of Human Resources
Post Office Box 2091
Raleigh, North Carolina 27602-2091

Supply Ecologist

Re: Resources Conservation and Recovery Act, Part B Permit, Facility ID No. NC6170022580, Marine Corps Base, Camp Lejeune, North Carolina

Dear Mr. Meyer:

In accordance with the N. C. Hazardous Waste Management Rules, the following changes to the subject permit are warranted:

a. The building number for TC 863 has been changed to TP 463.

b. Enclosure (1) to the application for the subject permit has been revised and is provided as enclosure (1) to this letter.

c. The position title for Mr. George Eggers, (page 37 of the application for the subject permit) has been changed to Environmental Protection Specialist.

Changes a and c above are administrative in nature. The revised Base Order, enclosure (1), was provided to your office previously in both draft and final form. For further assistance on this matter, please contact Mr. Julian Wooten at (919) 451-5003.

Sincerely,

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

Encl:
(1) BO 6240.5A

Copy to:
CMC (LFL)
COMLANTNAVFACENGCOM (Code 114)
DRMO, Lejeune

6241/1
NREAD
20 Aug 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Defense Reutilization and Marketing Officer, Marine Corps Base, Camp Lejeune

Subj: HAZARDOUS WASTE DRUMS AT AMTRAC BATTALION

Encl: (1) JTC Environmental Consultants Report #87-259 dtd 9 Jul 87

1. The enclosure identifies three drums, labelled 87-40, 87-42, and 87-43, as an ignitiable waste, D001, located at the 2nd Assault Amphibian Battalion. The drums have been inspected by Natural Resources and Environmental Affairs Division personnel, and have the hazardous waste labels and the sample numbers on them. The 2nd Assault Amphibian Battalion HMDO is preparing necessary turn-in documents.

2. Sample number 87-48 is an analysis of one of five barrels located at 2nd AAV Battalion that has been turned into DRMO. The analysis agrees with the D001 designation given by the HMDO.

3. It is imperative that these barrels be transported to the DRMO hazardous waste storage facility as soon as possible. The point of contact on this matter is Danny Sharpe, at extension 2083.

D. D. SHARPE
By direction

Copy to:
AAV BN (HMDO)
Div Engrs, 2d MarD, (HMDC)

20 JUL 1987

JTC DATA REPORT # 87-259

LABORATORY ANALYSIS ON NAVAL SAMPLES

CONTRACT #N62470-86-C-8754

CASE # 47

PREPARED FOR:

DEPARTMENT OF THE NAVY
ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
NORFOLK, VIRGINIA 23511-6287

PREPARED BY:

JTC ENVIRONMENTAL CONSULTANTS, INC.
4 RESEARCH PLACE, SUITE L-10
ROCKVILLE, MARYLAND 20850

JULY 9, 1987

Ann E Rosecrance

Ann E. Rosecrance
Laboratory Director

ENCLOSURE (1)

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 6-8-87 Turnaround: routine

Date: 7-9-87 Case No. 47 to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-259 Table 1

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		Corrosivity pH	Reactivity Cyanide ug/g	Reactivity Sulfide ug/g	TOX %	Flashpoint °C	PCB ug/L		
87-37	61-0387	5	*	*	*	N.O. boiled at 85°	<50		
87-38	61-0388	7	*	*	*	N.O. boiled at 85°	<50		
87-39	61-0389	7	*	*	*	N.O. boiled at 80°	<50		
87-40	61-0390	7	<10	<10	<0.05	45	<5 ug/g		
87-41	61-0391	7	*	*	*	N.O. boiled at 80°	<50		
87-42	61-0392	7	<10	<10	<0.05	30	<5 ug/g		
87-43	61-0393	7	<10	<10	<0.05	55	<5 ug/g		
87-44	61-0394	5	*	*	*	N.O. boiled at 60°	<50		
87-45	61-0395	6	*	*	*	N.O. boiled at 85°	<50		
87-46	61-0396	6	*	*	*	N.O. boiled at 80°	<50		
87-47	61-0397	6	*	*	*	N.O. boiled at 75°	<50		
87-48	61-0398	7	<10	<10	<0.05	30	<5 ug/g		

N.O. = not observed

* sample depleted unable to do analysis

JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 6-8-87 Turnaround: routine

Date: 7-9-87 Case No. 47 to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-259 Table 2

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		As ug/L	Ba ug/L	Cd ug/L	Cr ug/L	Pb ug/L	Hg ug/L	Se ug/L	Ag ug/L
87-37	61-0387	<10	<200	<20	<15	<100	<0.2	<5	<20
87-38	61-0388	12	<200	<20	<15	<100	<0.2	<5	<20
87-39	61-0389	<10	<200	<20	<15	<100	<0.2	<5	<20
87-40	61-0390	<0.5 mg/kg	<10 mg/kg	<1.0 mg/kg	0.85 mg/kg	<5 mg/kg	<0.1 mg/kg	<0.25 mg/kg	<1.0 mg/kg
87-41	61-0391	<10	2,677	<20	19	<100	<0.2	<5	<20
87-42	61-0392	<0.5 mg/kg	214 mg/kg	<1.0 mg/kg	<0.75 mg/kg	16.1 mg/kg	<0.1 mg/kg	<0.25 mg/kg	1.0 mg/kg
87-43	61-0393	<10	<200	<20	16	<100	<0.2	<5	<20
87-44	61-0394	<10	<200	<20	<15	<100	<0.2	<5	<20
87-45	61-0395	<10	<200	23	<15	<100	<0.2	<5	<20
87-46	61-0396	<10	<200	<20	<15	<100	<0.2	<5	<20
87-47	61-0397	<10	208	<20	<15	<100	<0.2	<5	<20
87-48	61-0398	<0.5 mg/kg	141 mg/kg	<20 mg/kg	<0.75 mg/kg	20.5 mg/kg	<0.1 mg/kg	<0.25 mg/kg	<1.0 mg/kg

Please ensure that this guidance is widely distributed within your component. Questions in particular instances should be taken to your cognizant legal office. This direction has been coordinated with OSD(GC).

Douglas Lackman

acting for Robert A. Stone
Deputy Assistant Secretary of Defense
(Installations)

cc: OSD(GC)
OSA(JAG)
OSN(JAG)
OSAF(JAG)
DLA(G)
DNA(GC)

CSCHAFER/thc/3-23/4-17/5-29-64
CASD(M&L)EP/3D833/57820

I Chron
I File
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EP Stayback

67497

File No. EQ-1.2

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File
Haz Waste

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, DC 20301

MANP
INSTALL
AND LO

JUN 1984

F THE ARMY, (I&L)
ETARY OF THE NAVY (I&F)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE (IE&S)
DIRECTOR, DEFENSE NUCLEAR AGENCY
DIRECTOR, DEFENSE LOGISTICS AGENCY

SUBJECT: State Environmental Taxes

The Department of Defense is obligated to comply with state requirements to control and abate pollution; this may include permit requirements and payment of reasonable "service charges." We are not, however, lawfully authorized to pay taxes to a state in these cases.

Whether a charge is a tax or a reasonable service charge depends on the actual character of the charge and not on the label affixed to it. A three element test for distinguishing a service charge from a tax was identified by the Supreme Court, and should be followed by DoD:

1. Is the charge imposed in a nondiscriminatory fashion; e.g., does it apply to all entities in the state who are engaged in the activity being taxed?

2. Is the charge "a fair approximation of the costs of benefits" received; e.g., does it seem reasonable in the context of the value of the permit received or assistance that might be provided to the regulated community?

3. Is the charge structured to produce revenue that will not exceed the total cost to the government of the benefits to be supplied; e.g., does it demonstrably support only the cost to the state of administering the program, or does it produce net revenues to the state for potentially unrelated uses?

If the answer to all three questions is "yes," the charge is a service charge, not a tax, and may be paid. The word "benefits" is used in questions 2 and 3 to mean "the benefits received by those on whom the charges are imposed," e.g., the receipt of a permit may be such a benefit.

All environmental fees and charges levied by a state on a DoD facility whether associated with the issuance of a permit or not should be evaluated against these criteria. Any state seeking to impose questionable charges should be requested to furnish the data and rationale necessary to justify our payment.

AT GOVERNMENT EXPENSE

Rend

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, DC 20301

MANPOWER
INSTALLATIONS
AND LOGISTICS

4 JUN 1984

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY, (I&L)
DEPUTY ASSISTANT SECRETARY OF THE NAVY (I&F)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE (IE&S)
DIRECTOR, DEFENSE NUCLEAR AGENCY
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[redacted] GOVERNMENT EXPENSE

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Hg Waste

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ANT SECRETARY OF DEFENSE
GTON, DC 20301

JUN 1984

OF THE ARMY, (I&L)
DEPUTY ASSISTANT SECRETARY OF THE NAVY (I&F)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE (IE&S)
DIRECTOR, DEFENSE NUCLEAR AGENCY
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L GOVERNMENT EXPENSE

Rend

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, DC 20301

MANPOWER
INSTALLATIONS
AND LOGISTICS

4 JUN 1984

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY, (I&L)
DEPUTY ASSISTANT SECRETARY OF THE NAVY (I&F)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE (IE&S)
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[redacted] GOVERNMENT EXPENSE

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Douglas Fortuna

Acting for Robert A. Stone
Deputy Assistant Secretary of Defense
(Installations)

cc: OSD(GC)
OSA(JAG)
OSN(JAG)
OSAF(JAG)
DLA(G)
DNA(GC)

OSCHAFER/thc/3-23/4-17/5-29-64
OASD(M&L)EP/3D833/57820

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67497

File No. EQ-1.2

Read

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, DC 20301

MANPOWER
INSTALLATIONS
AND LOGISTICS

4 JUN 1984

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY, (I&L)
DEPUTY ASSISTANT SECRETARY OF THE NAVY (I&F)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE (IE&S)
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Douglas Forbutter
acting for Robert A. Stone
Deputy Assistant Secretary of Defense
(Installations)

cc: OSD(GC)
OSA(JAG)
OSN(JAG)
OSAF(JAG)
DLA(G)
DNA(GC)

CSCHAFER/thc/3-23/4-17/5-29-64
OASD(M&L)EP/3D833/57820

1 Chron
1 File
EP Comeback
EP Stayback

67497

File No. EQ-1.2

M93182 7162-0001
EGGERS 272,000 (7166)

6240
MAIN

From: Hazardous Material Disposal Officer

To: Director, Defense Reutilization and Marketing Office, Camp Lejeune

Subj: DISPOSAL OF HAZARDOUS WASTE FUEL

Ref: (a) BO 6240.5

Encl: (1) DISPOSAL DOCUMENT DD 1348-1
(2) JTC ENVIROMENTAL CONSULTANTS, INC. REPORT #559

1. In compliance with the reference, enclosures (1) and (2) are submitted.

2. Currently, all storage tanks maintained by this organization for collection and storage of hazardous and/or contaminated fuel and lubricants are filled to capacity. Therefore, the requirement to empty the storage tank as listed on enclosure (3) is URGENT.

3. The storage capacity of the storage tank is 272,000 gallons. It is requested that the contents, down to the sludge level, be properly disposed of.

DAVID K. BULLOCK

Writer: D Bullock, Supply, x5300
Typist: D Pearson, 11 June 87

NREAD

6240
NREAD
AUG 14 1987

Env'l Cons

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Defense Reutilization and Marketing Office, Camp Lejeune

Subj: RCRA WASTE MINIMIZATION CERTIFICATION

Ref: (a) DRMO-ZWM (N. Hipp/5652/11p) of 24 July 1987
(b) BO 6240.5A
(c) MCO P11000.8B

Encl: (1) MCO 6280.8

1. This letter provides information requested by reference (a). Be advised that there is a Hazardous Waste Minimization Program in effect within the Camp Lejeune complex. Reference (b) assigns overall responsibilities for minimizing hazardous waste generation and providing compliance with Marine Corps requirements published in reference (c) and related state and federal regulations.

2. The DRMO is an intergral part of this program and is requested to ensure that disposal options are selected which maximize recycling and resource recovery.

3. The enclosure provides latest Marine Corps guidance on Hazardous Waste Minimization and will be implemented locally. It is anticipated that a Base Order providing expanded guidance will be developed and staffed by the end of the calendar year.

T. J. DALZELL
By direction

Writer/Typist G. Smith / T. Hardison
Date Typed 13 Aug 87
Word Processor Number Env'l disk

Writer/Typist G. Smith/T. Hourihan

Date Typed 19 Aug 91

Word Processor Number 6 in disk

6240
NREAD
21 Jul 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune

Subj: HAZARDOUS SUBSTANCE INCIDENT RESPONSE MANAGEMENT COURSE ON 27 July - 31 July 1987

Ref: (a) NEESA MSG 0516207 June 1987

Encl: (1) List of Attendees
(2) Memo NEESA/Chris Connelly

1. This memo is in response to your recent request for an update on the subject training to be held at Camp Lejeune as provided by the reference. Enclosure (1) lists personnel from local activities attending. We were fortunate to be able to get this many slots. Approximately eight individuals will be attending from other activities. Mr. Sammy Gwynn, NREAD, has coordinated base efforts to provide the support outlined in enclosure (2). The Civilian Personnel Division classroom, Bldg. 1003, will be used. Actual spill field exercises will be held at Building TP-448, on Piney Green Road.

J. I. WOOTEN

HAZARDOUS SUBSTANCE INCIDENCE RESPONSE
MANAGEMENT COURSE
ATTENDEES FROM CAMP LEJEUNE
27-31 July 1987

NAME	UNIT
TOM BARBEE	NREAD
ELIZABETH BETZ	"
GLENEE SMITH	"
MANUEL MARTIN	"
TEX RITTER	BASE SAFETY
JOHN KOKINDA	NAVAL HOSPITAL SAFETY OFFICE
HARRY J. USTACH	BASE FIRE DEPARTMENT
ROBERT J. OWENS	"
FLEMING E. WIGGINS	"
MELVIN M. SHEPARD	"
JAMES D. KELLUM	INSECT VECTOR
JEFF JONES	PREVENTIVE MEDICINE UNIT
IVEY SANCHEZ	"
RICHARD BROCK	TRAFFIC MANAGEMENT OFFICE
LT GONZALES	2d MARDIV
MSGT LOVEJOY	2d FSSG

ROUTINE REPLY, ENDORSEMENT, TRANSMITTAL OR INFORMATION SHEET

OPNAV 5216/158 (Rev. 7-78)
SN 0107-LF-052-1691

A WINDOW ENVELOPE MAY BE USED
Formerly NAVEXOS 3789

CLASSIFICATION (*UNCLASSIFIED when detached from enclosures, unless otherwise indicated*)

FROM (*Show telephone number in addition to address*)

DATE

SUBJECT

SERIAL OR FILE NO.

TO:
Sammy G. Wynn
MCB
NREA office
Camp Le Jeune NC 28542

REFERENCE

ENCLOSURE

VIA:

ENDORSEMENT ON

☐ FORWARDED ☐ RETURNED ☒ FOLLOW-UP, OR TRACER ☐ REQUEST ☐ SUBMIT ☐ CERTIFY ☐ MAIL ☐ FILE

GENERAL ADMINISTRATION	CONTRACT ADMINISTRATION	PERSONNEL
FOR APPROPRIATE ACTION	NAME & LOCATION OF SUPPLIER OF SUBJECT ITEMS	REPORTED TO THIS COMMAND:
UNDER YOUR COGNIZANCE	SUBCONTRACT NO. OF SUBJECT ITEM	
INFORMATION	APPROPRIATION SYMBOL, SUBHEAD, AND CHARGEABLE ACTIVITY	DETACHED FROM THIS COMMAND
APPROVAL RECOMMENDED ☐ YES ☐ NO	SHIPPING AT GOVERNMENT EXPENSE ☐ YES ☐ NO	OTHER
☐ APPROVED ☐ DISAPPROVED	A CERTIFICATE, VICE BILL OF LADING	
COMMENT AND/OR CONCURRENCE	COPIES OF CHANGE ORDERS, AMENDMENT OR MODIFICATION	
CONCUR	CHANGE NOTICE TO SUPPLIER	
LOANED, RETURN BY:	STATUS OF MATERIAL ON PURCHASE DOCUMENT	
SIGN RECEIPT & RETURN		
REPLY TO THE ABOVE BY:		
REFERENCE NOT RECEIVED		
SUBJECT DOCUMENT FORWARDED TO:		
SUBJECT DOCUMENT RETURNED FOR:		
SUBJECT DOCUMENT HAS BEEN REQUESTED, AND WILL BE FORWARDED WHEN RECEIVED		
COPY OF THIS CORRESPONDENCE WITH YOUR REPLY		
ENCLOSURE NOT RECEIVED		
ENCLOSURE FORWARDED AS REQUESTED		
ENCLOSURE RETURNED FOR CORRECTION AS INDICATED		
CORRECTED ENCLOSURE AS REQUESTED		
REMOVE FROM DISTRIBUTION LIST		
REDUCE DISTRIBUTION AMOUNT TO:		

REMARKS (*Continue on reverse*)

These are the support Requirement for training course -

I will help you with any that are difficult -

Good Luck

Chris

SIGNATURE & TITLE

COPY TO:

CLASSIFICATION (*UNCLASSIFIED when detached from enclosures, unless otherwise indicated*)

ENCLOSURE (1)

☆U.S. GOVERNMENT PRINTING OFFICE: 1981—703-100/8636 2-1

Christine Connelly
Environmental Enginee

NAVAL ENERGY AND ENVIRONMENTAL
SUPPORT ACTIVITY, CODE 112H
Port Hueneme, CA 93043

3351 3351 3351
5) 982-~~4504~~ FTS 799-~~4504~~ A/V 360-~~4504~~

Special requirements for IRMC:

1. 16 empty, closed-top, 55 gallon drums (with bungs).

2. 4 five-gallon pails. ✓

3. One-hand truck. ✓

4. 26 cardboard boxes (approximate volume, 1.5 cu. ft. each). GYSET SHAN

5. Two fire extinguishers available.

6. Bus to transport students to and from exercise area (if necessary).

7. Flat bed truck for transportation spill exercise. ✓

8. Enclosed area for a warehouse exercise with door to outside (located near classroom).

9. Field area for a spill exercise (located near classroom).

10. 600-1000 square foot area adjacent to classroom to be used for a suiting-up exercise. ✓

11. Secure storage area (indoors) located near classroom and exercise areas for protective equipment (SCBAs, environmental suits, air monitoring instruments, etc.). ✓

12. Medical personnel should be notified of the potential for heat stress incidents and the need for salt replacement liquids.

13. Provide one person and forklift with operator to assist contractor in unloading heavy boxes and setting up for course on day before course starts.
and for loading @ end of course

Support Requirements*

For all Courses:

VEESA

1. Prepare a course announcement and circulate it to your activities ten weeks before the course.

2. Ensure that there are enough nominations to justify holding the class (75% of class size).

3. Coordinate screening of nominations with NEESA.

4. Reserve a classroom for specified class size.

5. Ensure that classroom has the following audiovisual equipment set up and operation:

   - o Slide projector and screen
   - o 16mm movie projector
   - o Overhead projector 3/4 UMATIC
   - o 3/4" VHS video machine and television monitor (video recorder required for HSIRMCs) HAZARDOUS SUBSTANCE INCIDENCE RESPONSE MANAGEMENT COURSE

6. Ensure that classroom has a chalkboard; drapes or blinds; and tables (or large desks). Remember that students learn more if they are comfortable and the small (regular) desk/chair combination found in most classrooms are very uncomfortable for 8 hours a day. Also coffee and soft drink facilities are a definite advantage.

for HSIRMC

7. Arrange for and coordinate with guest speakers to provide site-specific information to the HWMS and HWFOC. The list of required guest speakers will be provided at a later date.

for NEESA

8. Present an overview of the environmental protection provided by your office and information on other navy sources of support to all HW training courses.

9. Provide for secretarial and logistic support to include:

Minimal!

   - o Stamping of military orders
   - o Resolution of billeting and security problems
   - o Small quantities of typing and copying support

Enclosure (2)

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 20 July 87

TO: Sam,
Please give me a little info for Col Dalzell on this.
Julian

FROM: SAM -
Lets Discuss
Shaife

ATTN: _____

1. Attached is forwarded for info/action.

2. Please initial, or comment, and return all papers to this office.

What is status of our participation in subject course?

3. Your file copy.

T.J. Dalzell

"LET'S THINK OF A FEW REASONS
WHY IT CAN BE DONE"

MCBCL 5216/21 (REV. 6-83)

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 17 July 1987

TO:

BASE MAINT O
PUBLIC WORKS O
COMM-ELECT O
DIR., NAT. RESOURCES & ENV. AFFAIRS

DIR, FAMILY HOUSING
DIR, UNACCOMPANIED PERS HSG
BASE FIRE CHIEF

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 17 July 1987

TO:

BASE MAINT O
PUBLIC WORKS O
COMM-ELECT O
DIR., NAT. RESOURCES & ENV. AFFAIRS
DIR, FAMILY HOUSING
DIR, UNACCOMPANIED PERS HSG
BASE FIRE CHIEF

ATTN: _____

1. Attached is forwarded for info/action.

2. Please initial, or comment, and return all papers to this office.

What is status of our participation in subject course?

3. Your file copy.

T. J. Dalzell

"LET'S THINK OF A FEW REASONS
WHY IT CAN BE DONE"

MCBCL 5216/21 (REV. 6-83)

UUUUUUUUU
U U N
UUUUUUUUU

I sent a copy of this to NREA (Sammy Owen). We were not on distribution. Sammy has talked w/personnel from Port Hueneme & they will know for sure how many quotas we can have after 2 July. As little as four..... up to 20. Sammy is coordinating with them –

Sue

ADMINISTRATIVE MESSAGE

ROUTINE

R 0516207 JUN 87 ZYB

FM NEESA PORT HUENEME CA

TO CG MCDEC QUANTICO VA
CG MCB CAMP PENDLETON CA
COMCABWEST EL TORO CA
COMCABEAST CHERRY PT NC
MCAS TUSTIN CA
MCAS NEW RIVER NC
CG MCB CAMP BUTLER JA
CG MCLB BARSTOW CA
CG MCAGCC TWENTYNINE PALMS CA
MCAS IWAKUNI JA
MCAS BEAUFORT SC
CG MCRD ERR PARRIS ISLAND SC
CG MCRD WRR SAN DIEGO CA
CG MCAS EL TORO CA
CG MCAS CHERRY PT NC
MCAS YUMA AZ
CAMP H M SMITH HI

INFO CMC WASHINGTON DC//LFI

UNCLAS //N12400//

PASS TO NATURAL RESOURCE AND ENVIRONMENTAL AFFAIRS OFFICES AND HAZARDOUS SUBSTANCE SPILL TEAMS
SUBJ: HAZARDOUS SUBSTANCE INCIDENT RESPONSE MANAGEMENT COURSE (HSIRMC)

1. NEESA IS PROVIDING A HSIRMC SPONSORED BY CMC TO BE HELD AT CAMP LEJEUNE NC ON 27-31 JUL 87. PLS PASS MSG TO ALL APPROR DEPTS AND TENANT ACT.

2. NOMINATION DEADLINE: 2 JUL 87
TUTITION: NONE
CLASS SIZE: 24
TARGET AUDIENCE: ON-SCENE COMMANDERS AND LEADERS OF A HAZARDOUS SUBSTANCE (HS) ON-SCENE OPERATIONS TEAM RESPONSIBLE FOR MGMT OF THE RESPONSE, CONTROL, CONTAINMENT, AND CLEAN UP OF HS SPILLS.
SCOPE: INSTRUCTION ON SAFE RESPONSE TO HS EMERGENCIES. INCLUDES: HAZARD RECOGNITION, TOXICOLOGY, LAWS, PPE, RESPONSE ORGANIZATION, INITIAL RESPONSE, CONTROL, CONTAINMENT, CLEAN UP, DECONTAMINATION,

MANP(2)...ACT FOR CG MCB CAMP LEJEUNE(11) 12400/ 1/0361
BCOS(1) BCPO(1) BSUO(1) CEOA(1) ECCC(4) OICB(1)

RTD:000-000/COPIES:0011

065991/160 1 OF 2 MATA0139 160/04:05Z 051620Z JUN 87
CSN:AUIB00114 NEESA PORT HUE

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

AND A SIMULATED SPILL INCIDENT.

3. ACTIVITIES WISHING TO NOMINATE PERS TO ATTEND THIS CRS SHOULD SEND THE FOL INFOR BY MSG TO NEESA WITH COPY TO MCB CAMP LEJUNE, CRO-TRNG IN THE FORMAT INDICATED BELOW:
NOMINEES'S NAME CODE ACTIVITY JOB TITLE GRADE/RANK
ALSO, THE NAME AND DATE OF THE CLASS DESIRED AND THE NAME AND PHONE NUMBER FOR A LOCAL POC SHOULD APPEAR ON THE MESSAGE.

4. NEESA POC'S FOR THIS COURSE ARE MR. DAN TANNER, A/V 360-4504, OR MS. CHRISTINE CONNELLY, A/V 360-3351, FTS 799 OR COMMERCIAL 805-2982.

BT

6241/2
NREAD
14 Jul 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Base Maintenance Officer, Marine Corps Base, Camp Lejeune

Subj: WASTE OIL STORAGE TANKS; ANALYSIS OF

Ref: (a) BO 6240.5

Encl: (1) JTC Environmental Consultants, Inc., Report #87-247
(2) JTC Environmental Consultants, Inc., Report #87-247 Addendum

1. On 28 May 1987, the four waste oil storage tanks at Holcomb Boulevard, two of the three tanks at Marine Corps Air Station, New River, and three of the six tanks at Tarawa Terrace, were sampled by NREAD. Sample numbers 87-49 through 87-52 are the Holcomb Boulevard tanks S-888, S-889, S-890, and S-891, respectively. Sample number 87-53 is the Marine Corps Air Station, New River tank in the middle and sample number 87-54 is the Marine Corps Air Station, New River tank closest to the crash crew. Sample numbers 87-55 through 87-57 are the tanks at Tarawa Terrace, STT-61, STT-62, and STT-63 respectively.

2. Based on data contained in enclosures (1) and (2), the contents of S-888, S-890 and STT-63 are specification used oil. The rest of the tanks, due to the levels of Total Organic Halogen (TOX), are regulated as a hazardous waste fuel by regulations outlined in the reference. The majority of the subject waste oil appears to be suitable for burning for recovery of energy based on information provided by Oldover Corporation, Aquadale, North Carolina.

3. It is recommended that the subject oil be turned in to DRMO for disposal. Point of contact is Danny Sharpe, extension 2083.

J. I. WOOTEN

Copy to:
DRMO
AC/S, FAC
EC&MS (2)

DD3

UNITED STATES MARINE CORPS
2d Marine Division, Fleet Marine Force
Camp Lejeune, North Carolina 28542-5500

IN REPLY REFER TO:
6240
G-4 ENGR
17 JUL 1987

From: Commanding General, 2d Marine Division, FMF
To: Commanding Officer, 10th Marine Regiment, 2d Marine Division, FMF

Subj: RESULTS OF HAZARDOUS WASTE MANAGEMENT COMPLIANCE INSPECTIONS

Ref: (a) BO 6240.5A
(b) CG, MCB 291625Z Oct 86
(c) BO 11090.1B
(d) CG, MCB 192005 Sep 84
(e) CG, MCB 111421 Mar 87

Encl: (1) CG, MCB CLNC ltr 6240 NREAD dtd 18 May 1987 (w/enclosure)

1. The subject inspection was conducted by Base Enviromental personnel in accordance with the references. The enclosure identifies cited discrepancies and provides recommendations for corrective actions.

2. Request a list of all corrective actions taken to date be provided this Headquarters by 17 Aug 1987. The date for re-inspection by Base Enviromental personnel will be coordinated through the Division Engineer Office.

3. Point of contact at this Headquarters is Captain J. M. REUTER, Division Engineer Officer, at extensions 2755/5111.

W. E. Marcantel
W. E. MARCANTEL
By direction

Copy to:
→ NREAD, MCB, CLNC

Twyla please note & remind me on 2 Jun
JdW

Danny & Steve
have a copy

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

IN REPLY REFER TO:
12410
FAC
MAY 08 1987

North Carolina State University
Department of Nuclear Engineering
Attn: Ms. Brenda W. Long
Box 7909
Raleigh, North Carolina 27695-7909

Dear Ms. Long:

Thank you for your recent invitation to attend the Hazardous Waste Management Workshop. We have several employees actively involved in all phases of Hazardous Waste Management throughout the base. We welcome the opportunity to avail ourselves of training, particularly on this subject and close at home.

The enclosure provides names and titles of personnel we would like to attend and the date desired. Our personnel are amenable to rescheduling if required.

Sincerely,

B. W. ELSTON
Deputy Assistant Chief of Staff, Facilities
By direction of the Commanding General

Encl:
(1) List of Attendees

Blind copy to:
MAIN
NREAD
FIRE

MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA

LIST OF ATTENDEES

Name	Title	Date/Location Desired
Ray French	Deputy Fire Chief	2 June, Beaufort
Robert Bright	Asst. Fire Chief	2 June, Beaufort
Julian I. Wooten	Director, Natural Resources & Environmental Affairs Div	2 June, Beaufort
Danny D. Sharpe	Supervisory Ecologist	2 June, Beaufort
Glenee Smith	Environ. Control Specialist	2 June, Beaufort
Lewis D. Shepard	Grounds Structure, General Foreman	2 June, Beaufort
Frank Lane, Jr.	Electrician, General Foreman	2 June, Beaufort
Coy Strain	Supvry Planner & Estimator (General)	2 June, Beaufort
Robert Marshall	Planner & Estimator (Carpenter)	2 June, Beaufort
James Grimmet	Planner & Estimator (Eng. Equip. Operator)	2 June, Beaufort
Donald Oglesby	Planner & Estimator (General)	2 June, Beaufort
Kenneth Shepard	Boiler Plant Operator, General Foreman	3 June, New Bern
Byron Frazell	Utilities Systems Operator General Foreman	3 June, New Bern
David Bullock	Supvry Supply Technician	3 June, New Bern

File

PROPOSED AGENDA

for

PLANNING SESSION, HM/HW MANAGEMENT PROGRAM BRIEFING

to

GOVERNORS ADVISORY COMMISSION ON MILITARY AFFAIRS

22 July 1987

MARINE CORPS BASE, CAMP LEJEUNE, NORTH CAROLINA

- Introduction of Attendees
- Purpose of Planning Session

  Feasibility
  Content
  Format

- Overview of HM/HW Management Program at Marine Corps Base, Camp Lejeune
- Overview, comments from other Commands
- Discussion
- Recommendations

PLANNING SESSION ATTENDEES

NAME	RANK	COMMAND	BILLET/POSITION	[redacted]
DALZELL, T. J.	COLONEL	CAMP LEJEUNE	AC/S FACILITIES	[redacted]
NELSON, R. D	GM-13	CHERRY POINT	NREAO	[redacted] 186
Dougherty, Chris	CAPT	Camp Lejeune	Office of Staff Judge Advocate	[redacted] 383
MACKMULL, Stephen J.	GS-11	Fort Bragg	Environmental Office	[redacted]
Talley, Debra J.	CPT	Fort Bragg	Ft Bragg JAG	[redacted] 193
Byrd, Bob	GS-11	Fort Bragg	Environmental Office	[redacted]
Harris, Kenneth L.	GS-12	Fort Bragg	Natural Resources Div	[redacted]
WRIGHT, Joseph A	GS-11	U.S. COAST GUARD SUPPORT CENTER	STAFF ENGINEER HAZ MAT MANAGEMENT	[redacted]
WOOTEN JULIAN	GS-12	NREAD CAMP LEJEUNE	Dir Nat Res	[redacted] 1690
SOMERS, BRUCE	GM-13	POPE AFB	DEPUTY BCE	[redacted]
LOPEZ, ROBERT	GS-11	POPE AFB	ENVIRONMENTAL PLANNING SEC	[redacted]
not in attendance Donny Jones		Seymour Johnson AFB		

~~SSA~~ NREA

T5120

5420
FAC
JUL 14 1987

From: Commanding General, Marine Corps Base, Camp Lejeune, North Carolina 28542-5001
To: Commanding General, Marine Corps Air Station, Cherry Point, North Carolina 28533

Subj: GOVERNORS ADVISORY COMMISSION ON MILITARY AFFAIRS

1. The Governors Advisory Commission on Military Affairs (GACMA) is established to provide a forum for the discussion of issues of mutual concern between United States military installations in North Carolina and the State. The next meeting is scheduled to occur at Marine Corps Base, Camp Lejeune, North Carolina, on 19 August 1987.

2. One current issue that is very prominent at the National, State and local level is the handling and disposal of hazardous material (HM) and hazardous waste (HW). Pursuant to the statutory scheme enacted by Congress, Environmental Protection Agency (EPA) has approved State enforcement of hazardous waste management regulations. The North Carolina Division of Health Services (DHS) is tasked to carry out the various enforcement actions.

3. In our continuing effort to maintain the dialogue between the military and civilian community, I propose that the military bases in North Carolina develop and present an appropriate briefing concerning our management of HM/HW for the next GACMA meeting. The brief would outline how we in the military deal with this extremely important issue.

4. My Director of Natural Resources and Environmental Affairs, Mr. Julian Wooten, has already contacted your action officers to obtain some initial impressions about this proposal. If you concur in the proposal, please let me or Mr. Wooten know as soon as possible. I suggest a planning session be conducted at 1000 on 22 July 1987 at Marine Corps Base, Camp Lejeune, North Carolina. The planning session should include appropriate subject matter and legal experts as you deem necessary and should be at the working officer level. The planning session will determine the feasibility of the proposal, proper format, items to be included, briefers and other necessary items.

5. I have requested comments from my staff; Marine Corps Air Station, Cherry Point; Fort Bragg; Seymour Johnson Air Force Base; Pope Air Force Base; and the U. S. Coast Guard Base, Elizabeth City.

Subj: GOVERNORS ADVISORY COMMISSION ON MILITARY AFFAIRS

6. Points of contact at Marine Corps Base, Camp Lejeune are as follows:

a. AC/S, Facilities: Colonel T. J. Dalzell
AV: 484-3034/5925

b. Director, Natural Resources and Environmental Affairs Division: Mr. Julian Wooten
AV: 484-5003/2083

c. Staff Judge Advocate: Captain C. E. Dougherty
AV: 484-5177/5675

M. C. HARRINGTON
Chief of Staff

Blind copy to:
FAC
NREAD
SJA

5200
NREAD
22 May 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune

Subj: COMPLIANCE WITH HAZARDOUS WASTE REGULATIONS PROMULGATED UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

Ref: (a) EPA Regulations contained in Code Federal Regulations Title: 40 Parts 260-265
(b) NC Administrative Code 10F, Parts 1 NC Hazardous Waste Management Rules
(c) Onsite Hazardous Waste Compliance Inspection by EPA and the NC Div of Health Services (DHS) of 26 Jun 87
(d) Onsite Hazardous Waste Compliance Inspection by EPA and DHS of 31 Mar - 1 Apr 87

Encl: (1) BO 6240.5A

1. Background

a. References (a) and (b) placed stringent regulations on the disposal and related handling of various types of hazardous materials which are defined by reference (a) to be hazardous wastes regulated by the subject law (RCRA). Camp Lejeune has been in serious negotiations with the DHS regarding possible enforcement and legal action related to discrepancies cited by EPA and DHS as result of reference (c). DHS has issued a compliance order to Camp Lejeune directing immediate compliance with reference (b). As a result of a reinspection during reference (d), the EPA has advised that Camp Lejeune is not in compliance with either reference (a) nor the compliance order issued by DHS. Although EPA acknowledged significant improvement since referene (c), EPA referred the matter to DHS for enforcement action.

b. The enclosure provided revised procedures, internal controls and responsibilities for addressing the various areas of concern relative to compliance with RCRA. Commonly generated hazardous wastes are used lithium batteries, waste electrolyte drained from damaged wet cell batteries, chlorinated and non-chlorinated solvents and degreasers and paint wastes, thinners and strippers. One issue which has arised out of references (c) and (d) is the applicability of references (a) and (b) to waste oil generated aboard the activity. For example, a recent analysis of samples taken of approximately 270,000 gallons of waste oil indicated high levels of halogenated solvents and chromium. Unless Camp Lejeune can prove that these contaminants were not deliberately dumped into the waste oil for purposes of disposal, the entire contents of that particular tank of oil will have to be managed as a hazardous waste. This can signi-

ficantly increase disposal costs particularly if the quality of the oil is further degraded due to high water content, anti-freeze and other contaminants resulting from sloppy shop operations.

c. Close examination of the physical and chemical characteristics of commonly generated hazardous wastes aboard Camp Lejeune, indicate that hazardous waste management aboard Camp Lejeune is not a technologically complex requirement. Except for waste oil, the volumes of regulated items generated annually are small. It is the large number of hazardous waste generation sites and the large number and rate of turnover of personnel involved in hazardous waste management which makes satisfactory compliance difficult. Simply said, Camp Lejeune has a "people management" problem when it comes to compliance with RCRA and references (a) and (b). The most significant management concerns arising out of references (c) and (d) were:

(1) The need for additional environmental management personnel to assist in providing training, technical assistance and monitoring of compliance,

(2) The identification of each and every location where hazardous waste handling and management at each location,

(3) Improved training of personnel on the environmental, safety, health and special handling requirements applicable to items regulated under RCRA,

(4) The assignement of higher priority to hazardous waste management by commanding officers and organizational commanders at all levels,

(5) Need to strengthen internal controls and inspections to ensure the prompt identification and correction of the many minor violations of RCRA and references (a) and (b) typical of military shops handling hazardous waste aboard Camp Lejeune and

(6) Improved segregation of used oil and solvents.

2. Current Status

a. Four additional environmental billets have been identifed to assist with implementation and enforcement of RCRA and references (a) and (b). While the number of environmental personnel has not been increased at this time due to funding constraints, two existing billets have been dedicated to hazardous waste management. It is anticipated that the four new billets will be filled by the first quarter of FY-1988.

b. Base environmental personnel are currently revising the hazardous waste training program and are conducting periodic training for hazardous waste handlers and managers. It appears that even if strict controls are placed on who is authorized

civilians will require formal training/training records annually.

c. The enclosure revised activity guidelines to address many of the concerns previously discussed. Primary responsibility for ensuring that hazardous wastes are collected, handled and disposed of properly has been assigned to the battalion/squadron commander. The enclosure requires battalion/squadron commanders to appoint a Hazardous Material Disposal Officer (HMDO) to over see hazardous waste management.

3. Future Action

a. As previosuly stated, EPA has referred the findings of their most recent inspection to DHS for enforcement. While the forwarding correspondence acknowledged signficant improvement in the Camp Lejeune Program, the potential exists that DHS enforcement action could include an attempt to assess fines/penalties. While Camp Lejeune will continue a dialogue with the DHS relative to local efforts to achieve compliance with RCRA, the risk of serious adverse publicity is present. Most of the violations of RCRA previously cited are minor. However, their number and recurrence jeopardizes our credibility, particularly in the perception of the general public whose information will be in the form of news media reports. At this time, the individual battalion/squardon commander is the key to putting this issue behind us. It is essential that these commanders place adequate priority on the subject issue. The following are examples of action needed:

(1) Ensuring that HMDOs appointed per the enclosure have the authority and resources required,

(2) Disciplinary action is taken against individuals violating published hazardous waste management procedures and regulations,

(3) Frequent inspections of generation sites by HMDOs until such time as personnel training programs can be strengthened,

(4) Improved cooperation between supply officers and base logistics officials to ensure local stocking of routinely used hazardous waste handling equipment, supplies and storage containers,

(5) Placing high priority on personnel training and awareness to the signficance of hazardous materials in the work place,

(6) Promote the use of solvent recycling services available in the private sector,

(7) Reducing the locations were hazardous wastes are stored.

b. The ultimate solution to this problem is for each and every Marine and civilian routinely handling hazardous waste to be properly trained and held accountable for their actions relative to the collection and disposal of hazardous waste. While Marine Corps Base can develop a training program, the total support of battalion and squadron commanders in enforcing the enclosure is essential.

JULIAN I. WOOTEN

d

From: CG

TO: Distribution List

Subj: HAZARDOUS WASTE (HW) TRAINING FOR BASE HAZARDOUS MATERIAL DISPOSAL OFFICERS (HMDO)

Ref (A): BO 6240.5

(B): HW TRAINING SESSION OF 16 DEC 1986

Encl (1): Record of Hazardous Waste Training (form for)

Encl (2): RECORD OF HAZARDOUS WASTE TRAINING HELD ON 16 DEC 86

1. The subject training is required on an annual basis by Reference (A) and state and federal regulations described therein. Reference (b) met the basic requirement for attendees for Calendar year 1986. HMDO's are requested to update their personal Hazardous waste Training records (see enclosure (1)) to include the course described in enclosure (2). A copy of the updated training record shall be forwarded to the Base Hazardous Material Disposal Coordinator (HMDC), Natural Resources and Environmental Affairs Division, Marine Corps Base, and to the Assistant Chief of Staff, Manpower, attention Civilian Personnel Director.

2. The Base HMDC, Mr. Sammy Gwynn, extension 2083, is available to answer questions about this matter.

From: CO

To: Distribution List

Subj: Hazardous Waste (HW) Training for Base Hazardous Material Disposal Officers (HMDO)

Ref (A): DO 5470.5

(B): HW Training Session of 15 Dec 1986

Encl (1): Recorded Hazardous Waste Training (Sem Su)

Encl (2):

1. The subject training is required on an annual basis by Reference (A) and state and federal regulations described therein. Reference (B) met the basic requirement for attendees for Calendar year 1986. HMDO's are requested to update their personal Hazardous Waste Training records (see enclosure(1)) to include the courses described in enclosure (2). A copy of the updated training record should be forwarded to the Base Hazardous Material Disposal Coordinator (HMDC) Natural Resources and Environmental Affairs Division, Building 1025, Base, or to the Assistant Chief of Staff, Management, attention Civilian Personnel Director.

2. The Base HMDC will Sponsor extensive 3083 is available to answer questions about this matter.

1. Name of Course: Hazardous Waste Management Orientation Course for Hazardous Material Disposal Officers (HMDO)

2. Instructors: Danny D. Sharpe, Supervisory Ecologist
Sam Gwynn, Biological Technician

3. Description of Course: Two hour formal Classroom Training on the Requirements of the Resource Conservation and Recovery Act; duties and responsibilities of HMDO's and Techniques for implementing a Battalion Hazardous waste management Program

4. List of Attendees:

Name of Organization	Representatives at Course
AC/S Logistics	Captain Peters
AC/S MWR	Dave Parker, Donald Raynor
Base Maintenance	None
Field Medical Service School	2Lt C.W. Hansen III, HM1 C.H. Schroeder
Headquarters Battalion	CWO-2 J.G. Williams
Infantry Training School	WO F.L. Cote
Marine Corps Engineer School	Major Ferral, 1st Lt G.L. McNatt
Marine Corps Service Support Schools	1st Lt R.D. Rule, MSgt Beckly
Reserve Support Unit	MGySgt Butcher
Rifle Range Detachment	GySgt J.U. Adams
Support Battalion	GySgt C.A. Diehl

INFO
Copy to:
CPD (TRNG)

Encl (2)

1. Name of Course: Hazardous Waste Management Orientation Course for Hazardous Material Disposal Officers

2. Instructors: Danny D. Sharpe, Supervisory Ecologist
Sam Gwynn, Biological Technician

3. Description of Course:

1. Name of Course: Hazardous Waste Management Orientation Course for Hazardous Material Disposal Officers (HMDO)

2. Instructors: Danny D. Sharpe, Supervisory Ecologist
Sam Gwynn, Biological Technician

3. Description of Course: Two hour formal classroom training on the Requirements of the Resource Conservation and Recovery Act; duties and responsibilities of HMDO's and Techniques for implementing a Battalion Hazardous waste management Program

4. List of Attendees:

Name of Organization	Representatives at Course
AC/S Logistics	Captain Peters
AC/S MWR	Dave Parker, Donald Raynor
Base Maintenance	None
Field Medical Service School	2Lt C.W. Hansen III, HM1 C.H. Schroeder
Headquarters Battalion	CWO-2 J.G. Williams
Infantry Training School	WO F.L. Cote
Marine Corps Engineer School	Major Ferral, 1st Lt G.L. McNatt
Marine Corps Service Support Schools	1st Lt R.D. Rule, MSgt Beckly
Reserve Support Unit	MGySgt Butcher
Rifle Range Detachment	GySgt J.U. Adams
Support Battalion	GySgt C.A. Diehl

Encl (2)

1. Name of Course: Hazardous Waste Management Orientation Course for Hazardous Material Disposal Officers

2. Instructors: Danny D. Sharpe, Supervising Geologist
Sam Gugum, Biological Technician

3. Description of Course:

1. Name of Course: Hazardous Waste Management Orientation Course for Hazardous Material Disposal Officers (HMDO)

2. Instructors: Danny D. Sharpe, Supervisory Ecologist
Sammy Gwynn, Biological Technician

3. Description of Course: Two-hour formal classroom training on the requirements of the Resource Conservation and Recovery Act; duties and responsibilities of HMDO's and techniques for implementing a Battalion Hazardous Waste Management Program

4. List of Attendees:

Name of Organization	Representative at Course
AC/S Logistics	Capt Peters
AC/S Morale, Welfare & Recreation	Dave Parker, Donald Raynor
Base Maintenance	None
Field Medical Service School	Lt C. W. Hansen, II
	HM1 C. H. Schroeder
Headquarters Battalion	CWO-2 J. G. Williams
Infantry Training School	WO F. L. Cote
Marine Corps Engineer School	Maj Ferral
	1stLt G. L. McNutt
Marine Corps Service Support Schools	1stLt R. D. Rule
	MSgt Becky
Reserve Support Unit	MGySgt Butcher
Rifle Range Detachment	GySgt J. V. Adams
Support Battalion	GySgt C. A. Diehl

PART I

RECORD OF HAZARDOUS WASTE TRAINING

1. Employee Name: _____

2. Job Title/MOS: _____

3. Name of Organization: _____

4. Date this Record Established: _____

5. Description of HW Duty: _____

6. Description of HW Training Completed:

a. Date	b. Description of Training/Name of Trainer	c. Signature and Date

Encl(1)

PART I - Description of HW Training Completed - (continued)

a. Date	b. Description of Training/Name of Trainer	c. Signature and Date

PART II

MINIMUM LEVELS AND RECORD KEEPING FOR HAZARDOUS WASTE MANAGEMENT ORIENTATION TRAINING

Personnel routinely handling HW will be provided sufficient on-the-job training to ensure adequate awareness to the items listed below:

(1) The types and characteristics of HM/HW handled.

(2) Applicable activity oil and hazardous substance spill prevention and contingency plan contained in BO 11090.1_.

(3) Organizational procedures and policy for implementation of BO 6240.5.

(4) Procedures to follow in protecting personal safety during HM/HW emergencies.

(5) The HW Standard Operating Procedure for the organization.

(6) The employees specific HW handling responsibilities.

Enc (1)

01 08 | DATE/TIME | MONTH | YR | ACT RR | INFO UUUU | Base Safety ATT

MESSAGE HANDLING INSTRUCTIONS

ADMIN | RS/Tex

FROM: LANTNAVFACENGCOM NORFOLK VA

TO: ABL CUMBERLAND MD

ARMED FORCES EXPERIMENTAL TNG ACTY CAMP PEARY VA

FCTCLANT DAM NECK VA

HPDTA HERTFORD NC

INACTSHIPFAC PORTSMOUTH VA

LANTCOMOPSUPPFAC NORFOLK VA

MARCORB CAMP LEJEUNE NC

MARCORCRUITSTA LOUISVILLE KY

MARCORCRUITSTA RICHMOND VA

MARCORCRUITSTA SOUTH CHARLESTON WV

MARCORESTRACEN BALTIMORE MD

MARCORESTRACEN LYNCHBURG VA

MARCORESTRACEN RICHMOND VA

MARCORESTRACEN ROANOKE VA

MARCORESTRACEN SOUTH CHARLESTON WV

MCAS CHERRY POINT NC

MCAS NEW RIVER NC

NAVAVNDEPOT CHERRY POINT NC

NAVAVNDEPOT NORFOLK VA

DISTR

NAVGRAM

P. A. RAKOWSKI, 5-2936, 1142, 1ac

COPY: 09BS, 09RF, 11, 11S, 114, 114S

R.D. CROWSON, DIR. UTIL. DIV., 4-9537

UNCLASSIFIED 1142/6 6/11/87

NAVGRAM

JOINT MESSAGEFORM UNCLASSIFIED

02 08 RR UUUU

ADMIN

FROM: NAS NORFOLK VA (2 CYS)

TO: NAS OCEANA VA

NAVCOMMSTA ROOSEVELT ROADS RQ

NAVHOSP CAMP LEJEUNE NC

NAVHOSP PORTSMOUTH VA

NAVMARCORESCEN LITTLE CREEK VA

NAVMARCORESCEN LOUISVILLE KY

NAVMARCORESCEN NEWPORT NEWS VA

NAVMARCORESCEN RICHMOND VA

NAVMARCORESCEN ROANOKE VA

NAVMARCORESCEN WHEELING WV

NAVORDSTA LOUISVILLE KY

NAVPHIBASE LITTLE CREEK VA

NAVRADSTA R SUGAR GROVE WV

NAVRADTRANSFAC DRIVER VA

NAVRESCEN BALTIMORE MD

NAVRESCEN CUMBERLAND MD

NAVRESCEN HUNTINGTON WV

NAVRESCEN LEXINGTON KY

NAVRESCEN PARKERSBURG WV

NAVGRAM

UNCLASSIFIED

03 OF 08 RR UUUU

MESSAGE HANDLING INSTRUCTIONS

ADMIN

FROM: NAVRESCEN SOUTH CHARLESTON WV

TO: NAVRESCEN STAUNTON VA

NAVSECGRUACT NORTHWEST VA

NAVSECGRUACT SABANA SECA RQ

NAVSHIPYD NORFOLK VA

NAVSTA NORFOLK VA

NAVSTA ROOSEVELT ROADS RQ

WPNSTA YORKTOWN VA

NSC NORFOLK CHEATHAM ANNEX VA

NSC NORFOLK VA

PWC NORFOLK VA

SUPSHIP NEWPORT NEWS VA

CNTT BAINBRIDGE MD

INFO CNO WASHINGTON DC (OP-45)

CINCLANTFLT NORFOLK VA

CMC WASHINGTON DC

CNET PENSACOLA FL

CHNAVPERS WASHINGTON DC

COMNAVAIRLANT NORFOLK VA

COMNAVAIRSYSCOM WASHINGTON DC

DATA

ENTER TYPED NAME TITLE OFFICE SYMBOL PHONE

OPERATIONAL INSTRUCTIONS

NAVRDAM

JOINT MESSAGE FORM UNCLASSIFIED

04 OF 08 RR UUUU

MESSAGE HANDLING INSTRUCTIONS

ADMIN

FROM: COMNAVBASE NORFOLK VA

TO: COMNAVFACENGCOM ALEXANDRIA VA

COMNAVFORCARIB ROOSEVELT ROADS RQ

COMNAVOCEANSYSLANT NORFOLK VA

COMNAVSEASYSCOM WASHINGTON DC

COMNAVSECGRUCOM WASHINGTON DC

COMSUBLANT NORFOLK VA

COMNAVSUPSYSCOM WASHINGTON DC

COMNAVSURFLANT NORFOLK VA

COMNAVTELECOM WASHINGTON DC

COMTRALANT NORFOLK VA

NAVCAMS LANT NORFOLK VA

NAVMEDCOM WASHINGTON DC

NAVMEDCOMMIDLANTREG NORFOLK VA

NAVSAFCEN NORFOLK VA

NEESA PORT HUENEME CA

NAVENVIRHLTHCEN NORFOLK VA

NSC NORFOLK VA (CRANEY ISLAND FUEL TERMINAL)

SOUTHNAVFACENGCOM CHARLESTON SC

NORTHNAVFACENGCOM PHILADELPHIA PA

DATE

NAVGRAM

JOINT MESSAGE FORM UNCLASSIFIED

Bob #

05 08 RR UUUU

MESSAGE HANDLING INSTRUCTIONS

ADMIN

FROM: WESTNAVFACENGCOM SAN BRUNO CA

TO: PACNAVFACENGCOM PEARL HARBOR HI

CHESNAVFACENGCOM WASHINGTON DC

UNCLAS //N06280//

SUBJ: SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT (SARA) OF 1986, SUBTITLE A, SECTION 302 OF TITLE III, NATIONAL OIL AND HAZARDOUS SUBSTANCES POLLUTION CONTINGENCY PLAN (NCP): EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW

A. PHONCON COMNAVFACENGCOM (MR. BRIAN HIGGINS)/ LANTNAVFACENGCOM (MR. PAUL RAKOWSKI) OF 5 JUN 87

B. 40 CFR 300, SUBPART I-EMERGENCY PLANNING AND COMMUNITY RIGHT-TO-KNOW, FEDERAL REGISTER, 12 DEC 86

C. 40 CFR PARTS 300 AND 365, NCP AND EMERGENCY PLANNING AND NOTIFICATION, FEDERAL REGISTER, 22 APR 87

D. DRAFT 40 CFR 370, HAZARDOUS CHEMICAL, REPORTING: COMMUNITY RIGHT-TO-KNOW, FEDERAL REGISTER, 30 JAN 87

1. WE HAVE RECEIVED VARIOUS INQUIRIES CONCERNING COMPLYING WITH INFORMATIONAL AND RELATED REQUESTS UNDER THE SUBJECT SECTION 302 OF SARA. WRITTEN POLICY GUIDANCE IS IN PREPARATION AT THE WASHINGTON LEVEL OF THE NAVY AND DOD. IN THE INTERIM, WE RECOMMEND THAT YOU

NAVGRAM

JOINT MESSAGE FORM UNCLASSIFIED

06 08 RR UUUU

MESSAGE HANDLING INSTRUCTIONS

ADMIN

RESPOND IN A POSITIVE AND CONCERNED MANNER AS OUTLINED BELOW TO FORMAL REQUESTS FROM ANY REGULATORY/STATE/LOCAL AGENCY. THIS INTERIM DIRECTION WAS CONFIRMED DURING REF A AND WILL BE MODIFIED WHEN FURTHER POLICY IS ISSUED.

2. SARA REQUIRES CERTAIN STATUTORY STEPS BE TAKEN BOTH BY EPA AND DESIGNATED STATE/LOCAL AGENCIES TO OBTAIN INFORMATION ON THE PRODUCTION, USE OR STORAGE OF 402 EXTREMELY HAZARDOUS SUBSTANCES. BOTH SARA, THE LAW, AND EPA'S REGULATIONS, REF B, CLEARLY EXCLUDE FEDERAL ACTIVITIES IN THE DEFINITION AS A PERSON SUBJECT TO THE REQUIREMENTS OF TITLE III OF SARA (SEE 40 CFR 300.92, DEFINITIONS). WE ANTICIPATE THAT THE FINAL POLICY TO BE ISSUED TO NAVY AND MARINE CORPS ACTIVITIES WILL MANDATE SUBSTANTIVE VOLUNTARY COMPLIANCE WITH TITLE III WITHOUT RELEASE OF ANY INFORMATION THAT WOULD VIOLATE OR COMPROMISE YOUR SECURITY INTERESTS. THE LIST OF THE 402 SUBSTANCES CAN BE FOUND IN REF C ALONG WITH THEIR THRESHOLD PLANNING QUANTITIES (ACTION/REPORTING LEVELS). A PROPOSED REPORTING/NOTIFICATION FORMAT WAS ISSUED BY EPA AS REF D.

3. WE RECOMMEND THAT YOU RESPOND IN WRITING TO ANY REQUESTS RECEIVED UNDER THE SUBJECT SECTION OF SARA AND INCLUDE THESE GENERAL STATEMENTS:

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07 08 RR UUUU

ADMIN

A. FEDERAL AGENCIES SUCH AS OURS ARE NOT STRICTLY REQUIRED TO COMPLY WITH TITLE III OF SARA. WE WERE NOT INCLUDED IN THE DEFINITION OF A PERSON IN EITHER SARA SECTION 329 OR 40 CFR 300.92 TO INSURE THAT INFORMATION DETRIMENTAL TO OUR SECURITY INTERESTS IS NOT RELEASED. HOWEVER, WE ARE A CONCERNED AND INVOLVED CITIZEN IN THE COMMUNITY AND WILL WORK WITH YOU TO MEET BOTH THE REQUIREMENTS AND INTENT OF SARA.

B. THE SCOPE AND EXTENT OF OUR VOLUNTARY COMPLIANCE WITH THE GOALS AND IDEALS OF SARA IS, UNFORTUNATELY, STILL IN THE DEVELOPMENT STAGE AT THE DOD LEVEL. THUS OUR ACTIVE AND DIRECT INVOLVEMENT IN THIS ISSUE IS IN A TEMPORARY HOLD STATUS UNTIL THIS POLICY IS RECEIVED.

C. WE WILL NOTIFY YOU JUST AS SOON AS THE POLICY IS RECEIVED. OUR COMMITMENT TO THE TITLE III REQUIREMENTS IS NOT TO BE ASSUMED TO BE NEGATIVE DUE TO THIS POLICY ABBERRATION. IF YOU ARE, OR WILL BE, DEVELOPING AREA/LOCAL EMERGENCY RESPONSE ORGANIZATIONS, WE WILL BE WILLING TO ATTEND AND DISCUSS WITHIN SECURITY LIMITATIONS AND TO THE BEST OF OUR CAPABILITY, OUR RESOURCES, MATERIALS STORED/USED, ETC., TO INSURE CONTINUITY OF YOUR INITIAL AND CONTINUING EMERGENCY AND PLANNING EFFORTS.

NOTE: PLEASE SEND COPIES OF ANY RESPONSES TO YOUR CHAIN OF COMMAND,

NAVGRAM

JOINT MESSAGE FORM

UNCLASSIFIED

08 08 RR UUUU

ADMIN

CNO (OP-45), YOUR AREA COORDINATOR, COMNAVFACENGCOM, CODE 112, AND THIS COMMAND, CODES 114 AND 09RF.

4. IF YOU REQUIRE FURTHER ASSISTANCE OR SUPPORT IN INITIAL MEETINGS WITH THE STATE OR LOCAL AGENCIES PERTAINING TO SARA TITLE III REQUIREMENTS, OUR POINT OF CONTACT IS MR. PAUL RAKOWSKI, AUTOVON 565-2936 OR (804) 445-2936.

NAVGRAM

OPNAV 5216/144A (Rev. 8-81)
S/N 0107-LF-052-2320

pink

DEPARTMENT OF THE NAVY

Memorandum

5200
NREAD

DATE: 21 Jul 87

FROM: Environmental Control Specialist, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune

TO: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune

SUBJ: BOILER WATER TREATMENT PROGRAM

Encl: (1) Boiler Water Analyses

1. This memorandum is submitted as requested by the Supervisory Ecologist, in response to information provided to the Environmental Control Specialist by the Utilities General Foreman, that the subject program had significantly deteriorated in the last few weeks.

2. Even though it had an adverse effect on performing my present duties as an Environmental Control Specialist, I spent one day, every two weeks, assisting steam generation with the subject program during the period of 25 February 1987 through 5 June 1987. When it became obvious that the Base Maintenance Officer was not going to get the Chemist position filled in a timely manner, a decision was made by the Director of Utilities to have the Boiler Plant Operator Leaders assume the duties of the Utilities Chemist regarding boiler water treatment. The leaders would provide quality assurance monitoring. It was agreed that I would train the leaders.

3. Working closely with Mr. Kenneth Shepard, I briefed each leader on how to gather and evaluate data and to make appropriate adjustments to the chemical program. I reviewed enclosure (1) with Mr. Shepard and provided copies to each of the leaders. Steam Generation has a staff of excellent leaders, and I was impressed with how they understood the process.

4. By mutual agreement between the Supervisory Ecologist and the Director of Utilities, I was to serve as a consultant directly to the Utilities Director, if he encountered any problems with the subject program and the new procedures.

5. On 17 July, 1987, I learned that the leaders have not been performing the quality assurance sampling and testing, and have not submitted any reports to the Director of Utilities.

6. The purpose of this memorandum, is to inform you of this situation.

GLENÉE SMITH

☆ U.S. GOVERNMENT PRINTING OFFICE: 1983-605-010:8460

BOILER WATER ANALYSES

ALKALINITIES

"P" Alkalinity

(1) Measure 25 ml of water into casserole dish.

(2) Add 2 drops of phenolphthalein indicator. If the water turns red (and boiler water should) titrate with sulfuric acid until the red color just disappears and the natural color of the sample appears.

(3) Take the buret reading and multiply it by 40. This will give you the "P" alkalinity. DO NOT POUR SAMPLE OUT! SAVE IT TO RUN "M" Alkalinity. ALSO, DO NOT REFILL BURET. BEGIN TITRATING FOR THE "M" ALKALINITY WHERE YOU STOPPED TO GET THE "P" ALKALINITY.

"M" Alkalinity

(1) TO THE SAME SAMPLE THAT YOU USED FOR THE "P" ALKALINITY TEST, add 3 or 4 drops of methyl purple indicator. If the water turns green titrate with sulfuric acid until the green color turns to a red-purple color.

(2) Take the buret reading and multiply it by 40.

"OH Alkalinity

(1) The method for hydroxide alkalinity is considered accurate only within 10%. Due to this, the following equation is used to calculate the "OH" Alkalinity: (2 x "P" Alkalinity) - "M" Alkalinity = "OH" Alkalinity.

Example: If your "P" alkalinity is 320 and your "M" alkalinity is 400, you would calculate for your "OH" alkalinity as follows:
(2 x 320) - 400 = OH alkalinity.
640 - 400 = 240
Therefore your OH alkalinity is 240.

BOILER WATER

CHLORIDES (Cl) TEST

1. Pour 25 ml of water into casserole dish.

2. Add 2 drops of Phenolphthalein Indicator. If water turns red (and boiler water should) titrate with N/50 Sulfuric Acid until the red color just disappears and the natural color of the sample appears.

3. Add 2 ml of Hydrogen Peroxide to the sample, if Sulfite (SO_3) is used in boiler water treatment.

4. Add 5 drops of Chromate Indicator to the sample.

5. Titrate with Silver Nitrate slowly until the yellow color turns a light orange-red.

6. Take the burette reading. Multiply this reading by 40 to get the Chloride reading.

PROCEDURE FOR HYDRAZINE TEST KIT

1. Fill both of the viewing tubes to the 5 ml mark with the water to be tested.

2. Add two drops of HydraVer™ II Hydrazine Reagent to one of the viewing tubes and swirl to mix. If hydrazine is present, a yellow color will develop in the first viewing tube. A very slight yellow color will be apparent in the second viewing tube due to the color of the reagent itself. Allow 15 minutes for coloer development.

3. Place the first viewing tube (containing boiler water with HydraVer II drops) in the right opening of the comparator.

4. Place the second viewing tube (containing just boiler water) in the left opening of the comparator.

5. Hold the comparator up to a light such as a window, the sky or a light, and view through the openings of the comparator. Rotate the disc until a color match is obtained.

6. Read the ppm Hydrazine (N_2H_4) through the scale window.

SULFITE (SO_3) TEST

(1) Measure 50 ml of water into casserole dish.

(2) Add 1 or 2 drops of phenolphthalein indicator.

(3) Add 1 scoop of starch at a time, stirring well after each scoop. After the water turns from pink to clear, add 1 extra scoop of starch while stirring.

(4) Titrate with iodide/iodate until a permanent <u>faint</u> blue color appears.

(5) Take the buret reading and multiply by 10 to get the SO_3 reading.

The SO_3 test is run at FC-202, BA-106, and M-230 unmanned plants.

BOILER WATER

PHOSPHATE (PO_4) TEST

(1) Filter sample.

(2) Measure to the 5 ml mark of the Phosphate Tube.

(3) Add Molybdate Reagent to the 15 ml mark of the Phosphate Tube.

(4) Add 2 small scoops of Stannous Chloride Power or 2 drops of Stannous Chloride Reagent.

(5) Shake sample and let stand for 2 to 3 minutes.

(6) Read Phosphate reading in the color slide.

CONDUCTIVITY

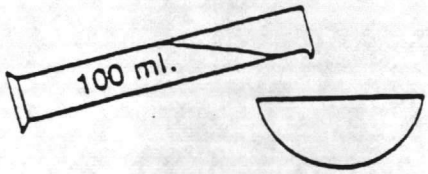
TDS

(1) Pour 100 ml of boiler water to be tested into a flask.

(2) Add conductivity neutralizing solution until sample turns pink. Continue to add conductivity neutralizing solution until the sample turns from pink to clear.

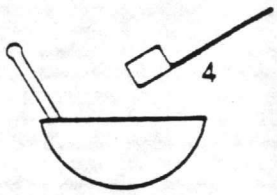
(3) Pour sample into conductivity meter cell. Read conductivity.

1. Measure and transfer a 100 ml water sample to the casserole.

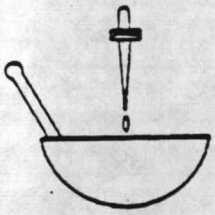


If sample is turbid, it should be filtered before measurement.

2. Add 4 level scoops of Reagent No. 1 to the casserole and stir.



3. If the solution is *yellow*, add 1 drop of Reagent No. 2 and proceed to step 4.



If the solution is *purple*, add Reagent No. 2 dropwise, while stirring, until the solution turns yellow. Then add 1 extra drop of Reagent No. 2 and proceed to step 4.

4. Fill burette to the 0.0 mark with Reagent No. 3.

Titrate the sample with Reagent No. 3 slowly, at a rate not to exceed thirty drops per minute.

Color change is from yellow to rose red, the endpoint.

Note the number of ml titrated. When the endpoint is reached, there will be no further color development when excess Reagent No. 3 is added.

Read the number of ml titrated from the burette and refer to the chart below to determine the ISOQUEST HT concentration.

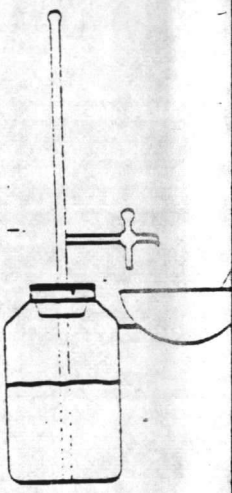


CHART FOR SLUDGE CONDITIONER 702

Burette reading	(ppm) parts per million	Burette reading	(ppm) parts per million
.5	13	3.8	178
.6	18	3.9	183
.7	23	4.0	188
.8	28	4.1	193
.9	33	4.2	198
1.0	38	4.3	203
1.1	43	4.4	208
1.2	48	4.5	213
1.3	53	4.6	218
1.4	58	4.7	223
1.5	63	4.8	228
1.6	68	4.9	233
1.7	73	5.0	238
1.8	78	5.1	243
1.9	83	5.2	248
2.0	88	5.3	253
2.1	93	5.4	258
2.2	98	5.5	263
2.3	103	5.6	268
2.4	108	5.7	273
2.5	113	5.8	278
2.6	118	5.9	283
2.7	123	6.0	288
2.8	128	6.1	293
2.9	133	6.2	298
3.0	138	6.3	303
3.1	143	6.4	308
3.2	148	6.5	313
3.3	153	6.6	318
3.4	158	6.7	323
3.5	163	6.8	328
3.6	168	6.9	333
3.7	173	7.0	338

Range

CHART FOR SLUDGE CONDITIONER 705 (High Range)

Burette reading	(ppm) parts per million	Burette reading	(ppm) parts per million
7.1	343	10.1	493
7.2	348	10.2	498
7.3	353	10.3	503
7.4	358	10.4	508
7.5	363	10.5	513
7.6	368	10.6	518
7.7	373	10.7	523
7.8	378	10.8	528
7.9	383	10.9	533
8.0	388	11.0	538
8.1	393	11.1	543
8.2	398	11.2	548
8.3	403	11.3	553
8.4	408	11.4	558
8.5	413	11.5	563
8.6	418	11.6	568
8.7	423	11.7	573
8.8	428	11.8	578
8.9	433	11.9	583
9.0	438	12.0	588
9.1	443	12.1	593
9.2	448	12.2	598
9.3	453	12.3	603
9.4	458	12.4	608
9.5	463	12.5	613
9.6	468		
9.7	473		
9.8	478		
9.9	483		
10.0	488		

UNITED STATES MARINE CORPS
Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

6288
NREAD
21 Jul 87

Mr. Paul Wilms, Director
Division of Environmental Management
NC Department of Natural Resources
and Community Development
Post Office Box 27687
Raleigh, North Carolina 27611

Dear Sir:

In accordance with requirements of the National Pollutant Discharge Elimination System (NPDES) Permit Number NC0003239, two copies of Discharge Monitoring Reports (DMRs) for the month of May 1987 are submitted.

The Hadnot Point Wastewater Treatment Plant did not meet the weekly minimum average for Dissolved Oxygen of 5.0 mg/l. The weekly average for 1-6 June 1987 was 4.0 mg/l. The return filter effluent pumps to the trickling filters were determined to have a reduced capacity. A new pump was placed in operation on 9 June 1987 and the plant met the monthly minimum average for dissolved oxygen.

Questions regarding this report should be forwarded to Ms. Elizabeth Betz, Supervisory Chemist, Natural Resources and Environmental Affairs Division, Assistant Chief of Staff, Facilities at (919) 451-5977.

Sincerely,

J. I. WOOTEN
Director, Natural Resources Division
By direction of the Commanding General

Encls:
(1) DEM Forms MR-1, MR-2 & MR-3 (2 copies)

Copy to:
EPA Region IV
CMDR, LANTNAVFACENGCOM
NEESA

JOINT MESSAGEFORM

SECURITY CLASSIFICATION
UNCLASSIFIED

PAGE	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF		ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO					
X 01 OF 03				RR		UUUU				2111450 X

BOOK

MESSAGE HANDLING INSTRUCTIONS

FROM: CG MCB CAMP LEJEUNE NC

TO: MCB CAMP LEJEUNE NC

CG SECOND MARDIV

CG SECOND FSSG

CG SIXTH MAB

CG II MAF

NAVHOSP CAMP LEJEUNE NC

NAVDENCLINIC CAMP LEJEUNE NC

INFO MCAS NEW RIVER NC

UNCLAS //N011015//

SUBJ: USE OF ONSLOW BEACH

A. COASTAL ZONE MANAGEMENT ACT

B. TRNG SOP BO P11102.1

C. BO 11017.1B

1. THE BEACH IS A VERY FRAGILE ECOLOGICAL SYSTEM WHICH IS HEAVILY USED BY THE CAMP LEJEUNE COMMUNITY FOR BOTH RECREATION AND MILITARY TRAINING. IT IS IMPERATIVE THE BEACH AND ASSOCIATED DUNE SYSTEM BE PROTECTED FROM FURTHER DETERIORATION SO IT WILL BE AVAILABLE FOR FUTURE GENERATIONS OF MARINES TO TRAIN.

DISTR:
|NREA|BFAC|BSJA|BCOS|BSDO|CEOA|OICB|GSTF|SSTF|OCDR

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

J. Wooten

J. WOOTEN, GS-12, DIR, NREA, 5003

SPECIAL INSTRUCTIONS

RELEASER

TYPED NAME, TITLE, OFFICE SYMBOL AND PHONE

T J DALZELL, AC/S FAC, 3034

SIGNATURE

SECURITY CLASSIFICATION
UNCLASSIFIED

DATE TIME GROUP

JOINT MESSAGEFORM

SECURITY CLASSIFICATION
UNCLASSIFIED

PAGE	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF		ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO					
X 02 OF 03				RR		UUUU				2111450 X

BOOK

MESSAGE HANDLING INSTRUCTIONS

2. CONSISTENT WITH REF {A}, MCB CONSTRUCTED SEVERAL SAND DUNE CROSSWALKS AT ONSLOW BEACH IN AN EFFORT TO REDUCE DAMAGE TO VEGETATION AND THE SAND DUNES BY FOOT TRAFFIC. PEDESTRIANS DESIRING TO VISIT ONSLOW BEACH ARE ENCOURAGED TO USE THE CROSSWALKS RATHER THAN WALK ACROSS THE DUNES.

3. REF {B} ESTABLISHES POLICY AND PROVIDES GUIDANCE FOR MILITARY TRAINING ACTIVITIES ON ONSLOW BEACH.

4. REF {C} ESTABLISHES POLICY AND PROVIDES GUIDANCES FOR OPERATING OFF ROAD RECREATIONAL VEHICLES {ORRVS} ON ONSLOW BEACH AND ATTENTION IS CALLED TO THE FOLLOWING INFORMATION FROM REF {C}.

A. THE AREA NORTH AND NORTHEAST OF THE NORTH TOWER IS AN IMPACT AREA AND OFF LIMITS TO ALL PERSONNEL.

B. THE AREA BETWN THE NORTH TOWER AND RISELEY PIER IS USED AS BOTH A RECREATION AND TRAINING AREA. PRIVATELY-OWNED VEHICLES OF ANY TYPE ARE PROHIBITED IN THIS AREA EXCEPT ON THE ROAD AND IN DESIGNATED PARKING AREAS.

C. THE AREA SOUTHWEST FROM RISELEY PIER TO THE NEW RIVER INLET IS PRIMARILY A TRAINING AREA, BUT SALTWATER FISHING IS PERMITTED WHEN NO TRAINING IS IN PROGRESS.

DISTR:

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

SPECIAL INSTRUCTIONS

RELEASER

TYPED NAME, TITLE, OFFICE SYMBOL AND PHONE

SIGNATURE

SECURITY CLASSIFICATION
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03 OF 03				RR		UUUU				2111450

BOOK

MESSAGE HANDLING INSTRUCTIONS

{1} ONLY REGISTERED FOUR-WHEEL DRIVE VEHICLES ARE PERMITTED PAST RISELEY PIER.

{2} FISHERMEN ARE PERMITTED TO TRAVEL IN REGISTERED FOUR-WHEEL DRIVE VEHICLES ON THE BEACH STRAND BETWEEN THE WATER'S EDGE AND THE SEAWARD SIDE OF THE DUNES, IF NECESSARY FOR ACCESS TO FISHING AREAS {EXCEPT AS RESTRICTED BY PARA {3} BELOW}. ACCESS POINTS FOR THE STRAND ARE AT RISELEY PIER AND THE SOUTH TOWER. VEHICLES ARE NOT PERMITTED TO CROSS OVER THE DUNES AT ANY OTHER POINT.

{3} FORM JUNE THROUGH OCTOBER, TRAVEL ON THE STRAND IS RESTRICTED TO THE HOURS OF DAYLIGHT FOR THE PROTECTION OF NESTING ATLANTIC LOGGERHEAD AND GREEN SEA TURTLES, [redacted] THREATENED SPECIES.

5. THERE IS EVIDENCE REFS {B} AND {C} ARE BEING ABUSED BY OPERATORS OF BOTH PRIVATELY OWNED OFF-ROAD RECREATIONAL VEHICLES {ORRVS} AND GOVERNMENT OWNED VEHICLES INCLUDING ALL TERRAIN VEHICLES. ALL PERSONNEL USING ONSLOW BEACH SHOULD BECOME FAMILIAR WITH APPLICABLE BASE REGULATIONS AS SAME ARE BEING ENFORCED BY BASE PMO. IT IS REQUESTED COMMANDING OFFICERS AND SUPERVISORS ADVISE SUBORDINATE PERSONNEL OF CONTENTS OF THIS MSG.

6. POC IN THIS MATTER IS MR. JULIAN WOOTEN, DIR, NREA, X2083.

DISTR:

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

SPECIAL INSTRUCTIONS

RELEASER

TYPED NAME, TITLE, OFFICE SYMBOL AND PHONE

SIGNATURE

SECURITY CLASSIFICATION
UNCLASSIFIED

DATE TIME GROUP

6280
NREAD
12 Aug 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune

Subj: ENVIRONMENTAL ASSESSMENT FOR WIDENING OF NC HIGHWAY 24

Ref: (a) AC/S FAC memo 6280/1 FAC of 10 Aug 87

1. In accordance with the reference, the subject environmental assessment provided therewith has been reviewed. It is recommended the need for a sidewalk/bicycle path across North East Creek which was addressed but ruled against be reconsidered. See page 5, paragraph 10.

JULIAN I. WOOTEN

5200
NREAD
22 Jul 87

From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
To: Purchasing and Contracting Officer, Marine Corps Base, Camp Lejeune, (Attn: Mr. Ken Silence)
Via: Base Maintenance Officer, Marine Corps Base, Camp Lejeune

Subj: PROPOSED SOLICITATION FOR CHEMICAL (PORTABLE) TOILETS FOR CAMP LEJEUNE

Ref: (a) FONECON btwn Ken Silence/Peggy Brydon, P&C, and Danny Sharpe, NREAD of 21 Jul 87

Encl: (1) NC DHS memo (Steve SteinBeck) dtd 30 Jun 87

1. This memo is in response to the reference. Based on the enclosure and telephone conversations with Mr. Cameron Lanier, Environmental Health Supervisor, Onslow County Health Department, and Mr. Mack Davis, Utilities Branch, Base Maintenance Department, the following wording for the subject solicitation is recommended:

"The toilets shall be maintained in a sanitary manner with the human wastes treated and disposed of at either the Hadnot Point or Camp Geiger Sewage Treatment Plants at a point designed by the Sewage Treatment Plant Operator.

J. I. WOOTEN

Blalock

North Carolina Department of Human Resources
Division of Health Services
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor
David T. Flaherty, Secretary

Ronald H. Levine, M.D., M.P.H.
State Health Director
919-733-2895

June 30, 1987

MEMORANDUM:

TO: Local Health Directors

ATTENTION: Public Health Sanitarians

FROM: Steve J. Steinbeck, Supervisor
On-Site Sewage Program
Sanitation Branch
Environmental Health Section

Steve J. Steinbeck

SUBJECT: HB-1272, Ratified--Chemical (Portable) Toilet Included in "Sanitary Sewage System" Definition [G.S. 130A-334(11)]

Attached is a copy of House Bill 1272 which was ratified and became effective June 19, 1987. This act amends the definition for "Sanitary Sewage Systems" in G.S. 130A-334(11) by adding a new sentence which provides that chemical (portable) toilets are to be considered a sanitary sewage system when they are properly managed and collect only human waste for mass gatherings, construction sites, and labor work camps.

"Properly managed," as interpreted by rules, means the toilets are maintained in a sanitary manner with the collected human wastes treated and disposed into either an approved ground absorption system or approved public or community sewage system. "Labor work camps" has been interpreted to include migrant labor camps and railroad worker camps.

Since chemical (portable) toilets are to be used for the collection of human feces and urine, the other wastes associated with bathing, laundering, food preparation, and cleaning shall be discharged into a sanitary sewage system other than a chemical (portable) toilet as provided by current laws and rules.

If you have any questions or if we may assist further in the application of this law, contact us at the address or telephone number listed above.

SJS/gb

Attachment

Enclosure (1)

cc: Mr. Marty Allen
Mr. John Barkley
Mr. Richard Baxley
Professor Joe Beck
Mr. Charles G. Boyette
Ms. Harriett Campbell
Dr. Trenton G. Davis
Mr. Robert Everett
Mr. Robert W. Farris
Ms. Paula Gupton
Mr. Mike Herring
Mr. Chris Hoke
Dr. Mike Hoover
Mr. Charles Jeffress
Ms. Cindy Kinsland
Y. J. Lao, Ph.D.
Dr. Ronald H. Levine
Mr. Gayl Manthei
Mr. Jerry Parks
Dr. Joe Phillips
Mr. W. E. Pierce
Ms. Julia Renfrow
Ms. Linda Sewall
Mr. Robert Smith
Mr. James F. Stamey
Mr. James Stewart
Mr. Tom Stich
Mr. Paul Wilms
All Sanitation Branch Staff
Branch Heads (Environmental Health Section)

GENERAL ASSEMBLY OF NORTH CAROLINA
1987 SESSION
RATIFIED BILL

CHAPTER 435
HOUSE BILL 1272

AN ACT TO CLARIFY THE LAW REGARDING SANITARY SEWAGE SYSTEM LAW AND CHEMICAL TOILETS.

The General Assembly of North Carolina enacts:

Section 1. G.S. 130A-334(11) reads as rewritten:

"(11) 'Sanitary sewage system' means a complete system of sewage collection, treatment and disposal including approved privies, septic tank systems, connection to public or community sewage systems, sewage reuse or recycle systems, mechanical or biological treatment systems, or other such systems.

Properly managed chemical toilets used only for human waste at mass gatherings, construction sites and labor work camps are considered sanitary sewage systems."

Sec. 2. This act is effective upon ratification.

In the General Assembly read three times and ratified this the 19th day of June, 1987.

ROBERT B. JORDAN III

Robert B. Jordan III
President of the Senate

LISTON B. RAMSEY

Liston B. Ramsey
Speaker of the House of Representatives

Chemical Toilets

LACY H. THORNBURG
ATTORNEY GENERAL

State of North Carolina
Department of Justice
P.O. BOX 629
RALEIGH
27602-0629

July 19, 1985

Mr. Chris Hoke
Agency Legal Specialist
Division of Health Services
Post Office Box 2091
Cooper Building, 6th Floor
Raleigh, North Carolina

Dear Mr. Hoke:

I am writing in response to your letter of July 9, 1985 concerning the declaratory ruling request by Mr. James A. Valkenaar. The issue presented is whether portable toilets (pumped out and cleaned weekly) serving a campground, operating April through September, are in compliance with State sewage rules (10 NCAC 10A .1934 et seq.)

G.S. 130A-335 requires every residence, place of business or place of public assembly to be provided with a sanitary sewage system. A campground is a "place of recreation" and therefore a "place of business." See G.S. 130A-334(6). A portable toilet is not, by definition, a "sanitary sewage system." See G.S. 130A-334(11). 10 NCAC 10A .1958(e) does permit chemical toilets for temporary purposes, such as mass gatherings, construction sites, and other places "for nonpermanent use." It is an accepted rule of construction that "general words of a statute which follow a designation of particular subjects or things be restricted by the particular designations to things of the same kind, character, and nature as those specifically enumerated." 12 N.C. Index, 3rd, Statutes, s. 5.12. Applying this rule, it is apparent that a six-month campground does not fall within the same category as mass gatherings and construction sites.

Therefore, 10 NCAC 10A .1958(e) is inapplicable and the definition of "sanitary sewage system", which does not permit portable toilets, controls.[1]

Therefore, the Sanitation Branch respectfully requests the hearing officer to declare that portable toilets (pumped out and cleaned weekly) are not an authorized sanitary sewage system to serve a campground operating April through September.

Very truly yours,

LACY H. THORNBURG
Attorney General

Robert R. Reilly

Robert R. Reilly
Assistant Attorney General

RRR:flf

cc: Mr. James A. Valkenaar
Mr. Clay S. Pennington

---

[1] An important distinction between th systems authorized as sanitary sewage systems and portable toilets is that the former provides treatment and the latter does not.

STATE OF NORTH CAROLINA
DIVISION OF HEALTH SERVICES
DECLARATORY RULING

IN RE: James A. Valkenaar, Sr.

I, Ronald H. Levine, M.D., M.P.H., State Health Director, Division of Health Services, issue this declaratory ruling pursuant to G.S. 150A-17. This ruling will interpret the applicability of G.S. Chapter 130A, Article 11, and 10 NCAC 10A .1900 to the factual situation described in Petitioner's letter of July 3, 1985. It will be binding on this agency, but only interprets the statutes and rules in light of the particular facts of this case. I reserve the right for this agency to make a prospective change in the interpretation which is made in this ruling.

G.S. 130A-335(a) requires every residence, place of business, or place of public assembly to be provided with a sanitary sewage system. The term "place of business" is defined in G.S. 130A-334(6) as including a "place of amusement or recreation." The primitive campground operated by Mr. Valkenaar is clearly a place of recreation, and therefore is required by G.S. 130A-335 to be provided with a sanitary sewage system.

G.S. 130A-335(b) requires that public or community sanitary sewage systems and sanitary sewage systems designed to discharge effluent to the land surface or surface waters be approved by the Department of Natural Resources and Community Development. The existing portable or chemical toilets at the campground do not fall into either of the above stated categories of systems required to be approved by the Department of Natural Resources and Community Development. G.S. 130A-335(b) further states that all other sanitary sewage systems be approved by the Department of Human Resources under rules adopted by the Commission for Health Services. Thus, to meet the requirement of G.S. 130A-335(a), the portable toilets must meet the requirements of the sewage rules adopted by the Commission for Health Services (10 NCAC 10A .1900).

The rules of the Commission for Health Services severely limit the use of chemical (portable) toilets. Rule 10 NCAC 10A .1958(e) permits only temporary use of chemical toilets for "mass gatherings, construction sites, or other places of business or public assembly for nonpermanent use." Although the campground is open for only six months out of the year, it is open on a yearly basis for those same six months. A sanitary sewage system provided for the campground will be used and needed on a permanent basis for years to come. In contrast, a sanitary sewage system for a construction site or a mass gathering will not be used or needed at the site when construction is finished or when the mass gathering ends. Clearly, this campground does not fall into the category of construction sites, mass gatherings, or other places of business requiring temporary sewage systems for nonpermanent use. Therefore, portable toilets are not an authorized sanitary sewage system to serve the campground in question under the rules of the Commission for Health Services.

For the foregoing reasons, this declaratory ruling finds that portable toilets provided at the campground owned by Mr. James A. Valkenaar, Sr., do not meet the requirements of G.S. Chapter 130A, Article 11, and 10 NCAC 10A .1900.

Ronald H. Levine 9/3/85
Ronald H. Levine, M.D., M.P.H. Date
State Health Director

FILE

UTINE

3119437 JUL 87

CG MCB CAMP LEJEUNE NC//BLDG//

CG SECOND MARDIV//G-4// CG SECOND FSSG//G-4//
CB CAMP LEJEUNE NC

CLAS //N05100//

UBJ: DSSC INFORMATIONAL BULLETIN 12-87 (HAZARDOUS MATERIAL
FORMATION SYSTEM (HMIS)

. CFR SECTION 1910.1200
. MCO 5100.25
. CG MCBCL MSG 261914Z JUN 87

. THE PURPOSE OF THIS BULLETIN IS TO PROVIDE INFO TO COMMANDERS/
UPERVISORS IN OBTAINING MATERIAL SAFETY DATA SHEETS (MSDS). REF A
EQUIRES EMPLOYERS TO HAVE AVAILABLE IN THE WORKPLACE A MSDS FOR
CH HAZARDOUS CHEMICAL WHICH THE EMPLOYEE COMES IN CONTACT ON A
ILY BASIS. AS DESCRIBED IN REF B DLA HAS RESPONSIBILITY OF
OLLECTING MSDS FOR SYSTEM ITEMS AND PUBLISHING THE DATA ON A HMIS
ICROFICHE (PCN 501 002 34000). UNIT REQUIREMENTS FOR THE
ICROFICHE MAY BE ORDERED THROUGH THE UNIT'S PUBLICATION CONTROL
ENTER.

. PROCEDURES HAVE BEEN INITIATED ON LOCALLY PROCURED ITEMS TO
DENTIFY HAZARDOUS MATERIAL IAW ENCL (1) OF REF B PRIOR TO
UBMITTING THE REQUISITION TO P&C. P&C HAS BEEN REQUESTING VENDORS
O PROVIDE A COPY OF THE MSDS AT THE TIME OF DELIVERY. REQUEST
NITS SUBMIT A COPY OF MSDS FOR DSSC NON STOCKED ITEMS TO MCB
AFETY OFFICER. IF MSDS ARE NOT PROVIDED AT TIME OF DELIVERY,
NITS SHOULD SUBMIT A REQUEST IN WRITING TO P&C PROVIDING ITEM
ESCRIPTION, COMPANY, CONTRACT NUMBER AND DOC NUMBER.

. THIS BULLETIN CANCELS REF C.

. POC THIS ACTIVITY IS MR NORMAN, T & R BRANCH, DSSC, EXT 5163.

OG(2)...ORIG FOR CG MCB CAMP LEJEUNE(118) /13/
DSSC(1) CEOA(1) OICB(1) BSDO(1) BCOS(1) SSTF(85) GSTF(12) OCDR(14)

RTD:000-000/COPIES:0118

211183/212 1 OF 2 MATA0500 212/20:08Z 311943Z JUL 87
N:RXIA00074 CG MCB CAMP LE

NAVS 216/144A (Rev. 8-81)
S/N 0107-LF-052-2320

DEPARTMENT OF THE NAVY

Memorandum

11090
NREAD

DATE: 1 Oct 1986

FROM: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune

TO: Base Maintenance Officer, Marine Corps Base, Camp Lejeune

SUBJ: USED OIL MANAGEMENT PROGRAM

Ref: (a) BMO memo 6280 of 26 Aug 86
(b) BMO memo of 1 Oct 86

1. References (a) and (b) have been reviewed and the following comments/recommendations are offered:

a. Natural Resources and Environmental Affairs Division (NREAD) views the management of subject program as a Base Maintenance function that should be staffed with a supervisor and enough manpower to collect, transport, store and arrange disposal of the product. The program also requires routine and emergency maintenance support performed by Base Maintenance for oil water separators and collection point systems to ensure Wastewater Treatment Plants aren't damaged thereby causing noncompliance with State and EPA guidelines.

b. The organizational structure should also provide for the operation and maintenance of the central, (14 each) used oil storage facilities.

J. I. Wooten
J. I. WOOTEN

Copy to:
AC/S FAC

U.S. GOVERNMENT PRINTING OFFICE: 1983-605-010:8660

OPNAV 52.6/144A (Rev. 8-81)
S/N 0107-LF-052-2320

T-11096

DEPARTMENT OF THE NAVY

Memorandum

6280
MAIN

DATE: 26 AUG 1986

FROM: Base Maintenance Officer, Marine Corps Base, Camp Lejeune

TO: Director, Natural Resources & Environmental Affairs Division (NREAD), Marine Corps Base, Camp Lejeune

SUBJ: REVIEW OF IMPLEMENTATION REQUIREMENTS FOR USED OIL MANAGEMENT PLAN

Ref: (a) Advanced Copy of Implementation Requirements and Recommendations for Used Oil Management

1. Review of the enclosure yields the following comments and recommendations:

a. NREAD as Camp Lejeune's Hazardous Material/Hazardous Waste Management Office should become responsible for the operation and execution of the Used Oil Management Plan (UOMP). Accordingly, we recommend the transfer of associated personnel and equipment to NREAD 1 October 1986 for implementation of the recommended actions.

b. An alternative to the above is to establish a service contract for the execution of the used oil recovery with NREAD as the technical representative.

2. Until items 1a, 1b, or other alternatives are adopted, the organizational entity within Base Maintenance to administer and execute the program remains vested with Base Maintenance management. Accordingly, the recommendations addressed in the reference were considered and additional taskings for the Utilities Branch is not considered a viable solution at this time.

C. G. POWELL
By direction

Julian
Ootter

Blind copy to:
AC/S, Facilities

AC/S Facilities ltr 6280/2 FAC of 23 July 86 pertains. I am not able to proceed with review and comment on the Ensafe Used Oil Management Plan until the issues raised above are resolved. Suggest personnel contact between you and Mr. Powell. Recommendation are unsound and totally inappropriate.

Danny Sharpe
26 Aug 86

OPNAV 5216/144A (Rev. 8-81)
S/N 0107-LF-052-2320

DEPARTMENT OF THE NAVY

Memorandum

6280/2
FAC

DATE: 23 JUL 1986

FROM: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune

TO: Director, Natural Resources and Environmental Affairs Division

SUBJ: REVIEW OF HAZARDOUS MATERIAL/WASTE AND USED OIL STUDY

Ref: (a) Dir, NREAD memo dtd 11 Jul 86

1. As requested in the reference, responsibility for a review and comments on the subject study is hereby assigned to your office. Mr. Alexander will assist in the review and provide comments for forwarding to LANTDIV and ENSAFE.

2. Request you develop and coordinate with Mr. Alexander on a schedule for the review.

B. W. ELSTON
By direction

Copy to:
EnvEngr

U.S. GOVERNMENT PRINTING OFFICE: 1985 — 505-012/18049

NORTH CAROLINA STATE UNIVERSITY

7/20/87

Sent to CPD for Personnel folder tb

PRESENTS THIS CERTIFICATE TO

DANNY SHARPE

FOR PARTICIPATION IN

HAZARDOUS WASTE MANAGEMENT UNDER RCRA UPDATED

JULY 14-15, 1987

J. Kobo
INSTRUCTOR

Bruce R. Poulton
CHANCELLOR

W. L. Turner
VICE CHANCELLOR FOR EXTENSION AND PUBLIC SERVICE

Larry K. Monteith
DEAN OF SCHOOL

A CONTINUING EDUCATION/PROFESSIONAL DEVELOPMENT PROGRAM OF THE SCHOOL OF ENGINEERING

00 JW

PNAV 5216/144A (Rev. 8-81)
S/N 0107-LF-052-2320

DEPARTMENT OF THE NAVY

Memorandum

11345.4
MAIN

DATE: 15 July 1987

FROM: Utilities Systems General Foreman

TO: Director, Natural Resources and Environmental Affairs
Via: Director, Utilities Branch DB

SUBJ: RESULTS OF WASTEWATER TREATMENT COMPLIANCE MONITORING

Ref: (a) Your ltr 6286/1 of 13 July 1987

1. Per the reference, the following data concerning violation of Disolved Oxygen Permits Limits (Weekly) at the Hadnot Point Wastewater Plant is provided.

a. A new trickling filter return effluent pump was installed on 9 June 1987. Since the pump installion, the D.O. has averaged 5.6 mg/l.

2. If we could be of any further assistance, please contact us at your earliest convenience.

B. M. FRAZELLE, II

Scotch® 7664 "Post-it" Routing-Request Pad

ROUTING - REQUEST 16 July

Please
- [ ] READ
- [ ] HANDLE
- [ ] APPROVE

and
- [ ] FORWARD
- [ ] RETURN
- [ ] KEEP OR DISCARD
- [ ] REVIEW WITH ME

To beer nut
Has Copy to
Betsy (?)
Julian

Date _____ From _____

00 JW

PNAV 5216/144A (Rev. 8-81)
S/N 0107-LF-052-2320

DEPARTMENT OF THE NAVY

Memorandum

11345.4
MAIN

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B. M. FRAZELLE, II

U.S. GOVERNMENT PRINTING OFFICE: 1982-505-106:8483

NREAD

6240
NREAD
JUL 14 1987

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commandant of the Marine Corps, (Code LFL)

Subj: MARINE CORPS USAGE OF CHLOROFLUOROCARBONS, CHLOROCARBONS, AND HALONS

Ref: (a) CMC ltr 6280/3 LFL/2-787 of 8 May 87

Encl: (1) Quantitative Information needed on usage of Halons
(2) Quantitative Information Use of Potential OZONE DEPLETERS (POD's) other than Halons

1. In response to the reference, enclosures (1) and (2) are provided.

2. Point of contact on this matter is Ms. Glenee Smith, Natural Resources and Environmental Affairs Division, at Autovon 484-5003.

T. J. DALZELL
By direction

Environmental Specialist
Supvy Ecologist

Writer/Typist Smith/Grienaki
Date Typed 14 Jul 87
Word Processor Number 6240

Typed _____

Date Typed _____

Word Processor Number _____

QUANTITATIVE INFORMATION NEEDED ON USAGE OF HALONS

Halon Type (1211 or 1301)	System/Use[1]	Aggregate Quantities for Each Intended System/Use: On Hand	Procured * Per Year	Emitted[2] Per Year	Substitutes[3]	Emission[4] Controls	Detection[5] System(s)	Remarks[6]
1211	RESPONSE VEHICLES	200 lbs.		UNKNOWN	CO_2/DRY CHEMICALS	NONE		EXISTING RECORDS, INVENTORY
1211	COMPUTERS AT MARINE CORPS EXCHANGE	80 lbs.		UNKNOWN	CO_2/DRY CHEMICALS	NONE		EXISTING RECORDS, INVENTORY ELIMINATION OF HALON WOULD NOT AFFECT FIRE SUPPRESSION SINCE THERE ARE SUITABLE SUBSTITUTES.

COMMENT: The Halon extinguishers were procured only one time. There are no plans to purchase additional Halon units.

Encl (1)

ENCLOSURE (1)

QUALITATIVE INFORMATION USE OF POTENTIAL OZONE DEPLETERS (PODs) OTHER THAN HALONS

	Chemical[1*]	Class[2]	Use[3]	On Hand[4]	Estimated Quantity (To the nearest 100 lb) Procured Per Year	Consumed[5] (Destroyed) Per Year	Emitted[6] Per Year	Disposal[7] Per Year	Substitute[8]	Remarks[9]
1.	Trichloro-methane, CCl_3F, Freon 11	CFC	REFRIGERANT	1400	6600	6600	UNKNOWN	NONE	UNKNOWN	EXISTING RECORDS
2.	Dichloro-fluoromethane, CCl_2F_2 Freon 12	CFC	REFRIGERANT	600	11,000	11,000	UNKNOWN	NONE	UNKNOWN	EXISTING RECORDS
3.	Chlorodi-fluoromethane, $CHClF_2$ Freon 22	CFC	REFRIGERANT	3500	10,000	10,000	UNKNOWN	NONE	UNKNOWN	EXISTING RECORDS
4.	1, 1, 2-trichloro-1, 2, 3-trifluoro-ethane, CCl_2FCClF_2 Freon 113	CFC	REFRIGERANT	NONE	500	500	UNKNOWN	NONE	UNKNOWN	EXISTING RECORDS
5.	1, 1, 1, trichloro-ethane, CH_3CCl_3	CC	DEGREASER	1200	11,000	11,000	UNKNOWN	NONE	DRY CLEANING SOLVENT	EXISTING RECORDS

*COMMENT: Approximately 1000, 12 oz. spray cans of 1, 1, 1 Trichloroethane are used for cleaning precision instruments and electrical equipment.

ENCLOSURE (2)