FILE FOLDER

DESCRIPTION ON TAB:

6240A HM/HW

General

☐ **Outside/inside of actual folder did not contain hand written information**

☑ **Outside/inside of actual folder did contain hand written information**
***Scanned as next image**

Confidential Records Management, Inc.
New Bern, NC
1-888-622-4425
9/08

JAN 01 1986

JAN 1988 - DESTROY
SECNAVINST 5215.5B,Part 11,Chap 1
Par 11010(1)(b)
RETENTION - 2 YEARS

File 6240

DEFENSE LOGISTICS AGENCY

Inter-Office Memorandum

IN REPLY REFER TO DRMS-P (D. Jackson/(901)775-6059/1fc)

31 DEC 1986

SUBJECT: Notification Pursuant to EPA Land Disposal Restrictions

TO: All Contracting Officers' Representatives

1. It has been determined by EPA that a notification should be provided to the disposal facilities for F001 thru F005 waste.

2. Therefore, the enclosed notification should be attached to the manifest upon removal of waste and signed by the generator or designee.

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

Deborah P. Jackson

DEBORAH P. JACKSON
Contracting Officer

Encl

TO: BETZ

Does our hazardous waste identification protocal provide info required to support DRMO's submittal of the attached notification?

DDS

D. Sharpe

DLA FORM JULY 82 111 PREVIOUS EDITION MAY BE USED UNTIL EXHAUSTED

Manifest No._____

NOTIFICATION

This notification is provided in accordance with 40 C.F.R. § 268.7(a)(1). The above-numbered manifest includes one or more of the following restricted wastes: F001, F002, F003, F004 and/or F005. The applicable treatment standards for these restricted wastes are as follows:

—TABLE CCWE—CONSTITUENT IN WASTE EXTRACT

F001—F005 spent solvents	Concentration (in mg/l)	
	Wastewaters containing spent solvents	All other spent solvent wastes
Acetone	0.05	0.59
n-Butyl alcohol	5.0	5.0
Carbon disulfide	1.05	4.81
Carbon tetrachloride	.05	.96
Chlorobenzene	.15	.05
Cresols (and cresylic acid)	2.82	.75
Cyclohexanone	.125	.75
1,2-dichlorobenzene	.85	.125
Ethyl acetate	.05	.75
Ethyle benzene	.05	.053
Ethyl ether	.05	.75
Isobutanol	5.0	5.0
Methanol	.25	.75
Methylene chloride	.20	.96
Methylene chloride (from the pharmaceutical industry)	12.7	.96
Methyl ethyl ketone	0.05	0.75
Methyl isobutyl ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,2,2-Trichloro-1,2,2-trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

Nothing in this notification shall be interpreted to permit or authorize any method of treatment and/or disposal other than in accordance with the applicable disposal contract.

INSTRUCTIONS:

1. Fill in corresponding manifest number.
2. Attach waste analysis data, where available.
3. Sign and date form below.
4. Retain one copy with the manifest.

Printed/Typed Name _____ Signature _____ Date _____

JdW Rita

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

DEPARTMENT OF THE NAVY

Memorandum

6240
FIRE

DATE: 10 Dec 1986

FROM: Base Fire Chief

TO: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune (Attn: Danny Sharpe)

SUBJ: REVIEW OF REVISION OF SPCC PLANS AND OIL AND HAZARDOUS SUBSTANCE SPILL CONTINGENCY PLAN

1. After reviewing the SPCC Plans and Hazardous Substance Spill Contingency Plan, I became very concerned that the role of the Fire Protection Division and its responsibilities from the time of notification to disposal are ever increasing. Due to this ever increasing scope of responsiblity, I suggest thought be given to establishing a Special (fully trained and equipped) Hazardous Materials Response Squad at Camp Lejeune to respond in concert with Fire Protection Division personnel. The Fire Protection Division's area of responsibilities is not only increasing in the Fire Protection/ Prevention field, but also in other areas such as emergency medical services. More undivided attention should be devoted to hazardous substances. Maybe Camp Lejeune could set up such a squad under the Model Installation Program. Many municipalities have such a program and they were developed due to firefighers not being able to devote full attention to hazardous materials and their impact.

2. Another major concern is training. There are 115 firefighters at Camp Lejeune. They all need special training in chemistry and tactical operations. With a special hazardous materials squad, the scope of training cost would be much less due to the reduced number of people who receive specialized training.

3. Another concern, and maybe I am wrong, but from my vantage point, the major emphasis in regards to hazardous materials is in the wrong direction, too much on leak/spill/control/containment/cleanup, and not enough on the elimination of the cause.

4. The Plan looks good. However, I'm sure you can tell from my response that I am most concerned about the hazardous materials problem receiving its due attention. Perpetual training is a must.

R. M. PINER, Jr.

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

PRIORITY

P 132114Z NOV 86

FM CG SECOND MARDIV

TO SECOND MARDIV

INFO CG MCB CAMP LEJEUNE NC

UNCLAS //N06280//

SUBJ: HAZARDOUS MATERIAL DISPOSAL PROGRAM

A. BO 6240.5
B. CG MCB CAMLEJ 291625Z OCT 86

1. REF (A) PROMULGATES THE RESPONSIBILITIES, PROCEDURES AND GUIDELINES FOR HAZARDOUS MATERIAL (HM) AND HAZARDOUS WASTE (HW) HANDLING, LABELING, PACKAGING, STORAGE AND TRANSPORTATION. COMPREHENSIVE FEDERAL LEGISLATION HAS PLACED STRINGENT LEGAL REQUIREMENTS ON THE MANAGEMENT OF HM AND HW. CIVILIAN AND MILITARY PERSONNEL FAILING TO FOLLOW ESTABLISHED PROCEDURES MAY BE SUBJECT TO BOTH CIVIL AND CRIMINAL PENALTIES. STRICT ADHERENCE TO ESTABLISHED PROCEDURES IS NECESSARY TO AVOID IMPOSITION OF CIVIL AND/OR CRIMINAL PENALTIES.

2. AN ON-SITE HW INSPECTION WAS CONDUCTED BY ENVIRONMENTAL PROTECTION AGENCY (EPA) AND STATE DIVISION OF HEALTH SERVICES (DHS) DUR JUNE 1986. NUMEROUS DISCREPANCIES WERE IDENTIFIED. STATE DHS IS CONDUCTING A RE-INSPECTION DUR DECEMBER 1986. IN PREPARATION FOR THIS RE-INSPECTION MCB, CAMLEJ PROVIDED COURTESY VISITS DUR OCT TO ENSURE EPA AND STATE DHS IDENTIFIED DISCREPANCIES WERE CORRECTED. IN MANY CASES CORRECTIVE ACTION WAS NOT TAKEN.

3. THE FOLLOWING VIOLATIONS WERE CITED DUR THE JUN INSPECTION AND THE OCT VISIT.
A. FAILURE TO PROVIDE PERSONNEL TRAINING.
B. FAILURE TO MAINTAIN WRITTEN JOB DESCRIPTIONS AN# TRAINING RECORDS.

BFAC(2)...INFO FOR CG MCB CAMP LEJEUNE(17) 06280/ 1/0179
BCOS(1) BSDO(1) BSJA(1) CEOA(1) DENT(4) HOSP(4) MAIN(1) NREA(1)
OICB(1)

RTD:000-000/COPIES:0017

479373/318 1 OF 3 MATA0016 318/00:33Z 132114Z NOV 86
CSN:RDVR00011 CG SECOND MARD

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

C. FAILURE TO POST SITE SPECIFIC SPILL CONTINGENCY PLANS.
D. FAILURE TO PERFORM WEEKLY INSPECTIONS.
E. FAILURE TO PROPERLY LABEL CONTAINERS.
F. FAILURE TO PPOPERLY DATE CONTAINERS.
G. FAILURE TO DISPOSE OF HW WITHIN 90 DAYS.
H. IMPROPER STORAGE OF EMPTY BATTERIES (I.E., STORAGE UPSIDE DOWN SO AS TO ALLOW LEAKAGE TO ENVIRONMENT).

4. HW MANAGEMENT OBJECTIVES, TO CORRECT THE DISCREPANCIES ABOVE ARE AS FOLLOWS:
A. TO MINIMIZE DUMPING OF SOLVENTS INTO WASTE OIL.
B. TO MINIMIZE THE NUMBER OF SITES WHERE HW IS GENERATED AND STORED.
C. TO MAKE PERSONNEL WORKING AT SITES WHERE HW IS HANDLED AND STORED AWARE OF SPECIAL REQUIREMENTS WHICH MUST BE ADDRESSED IF COMPLIANCE WITH EPA REGULATIONS ARE TO BE MAINTAINED.
D. TO MINIMIZE THE NUMBER OF PEOPLE ROUTINELY HANDLING HW.
E. THAT PERSONNEL ROUTINELY WORKING AROUND HW AND HM KNOW WHAT TO DO IN CASE OF SPILL OR OTHER EMERGENCY.
F. THAT SUPERVISORS/NCO'S/SNCO'S/OFFICER'S RESPONSIBLE FOR HW MANAGEMENT ARE CAPABLE OF SHOWING EPA INSPECTORS AROUND THEIR WORK AREAS, EXPLAINING THE HW ACTIVITY CARRIED OUT IN THE WORK AREA, AND DEMONSTRATING TO THE INSPECTOR THAT THE SHOPS HAVE HW MANAGEMENT UNDER CONTROL.
G. THAT EACH BN/SEP CO CMDR ESTABLISHES INTERNAL INSPECTIONS AND OTHER MANAGEMENT CONTROLS ON HW HANDLING REQUIRED TO PROVIDE SATISFACTORY COMPLIANCE WITH HW REGULATIONS.
H. THAT APPROPRIATE DISCIPLINARY ACTION BE TAKEN AGAINST PERSONNEL REFUSING TO SATISFACTORILY COMPLY WITH HW REGULATIONS.

5. BY REF (B), MCB, CAMLEJ, NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS (NREA) WILL START CONDUCTING FORMAL HW INSPECTIONS ON 17 NOV 1986. EACH INSPECTION WILL RESULT IN A WRITTEN REPORT LISTING SPECIFIC VIOLATIONS OF REF (A) AND THE REGULATIONS CITED THEREIN. THE INSPECTIONS WILL BE AT THE BN/SEPARATE CO (OR EQUIVALENT) LEVEL AND WILL CONSIST OF THE FOLLOWING:
A. AN INBRIEF FOR THE COGNIZANT S-4 AND OTHER OFFICIALS.
B. A REVIEW OF BN/CO RECORDS AND EFFORTS TO ENSURE COMPLIANCE WITH REF (A).
C. AN INSPECTION OF SELECTED HW GENERATION AND STORAGE SITES.
D. AN OUTBRIEF FOR THE COGNIZANT S-4.
E. TRANSMITTAL OF A WRITTEN INSPECTION REPT LISTING DISCREPANCIES AND REQUIRED CORRECTIVE ACTION VIA THE CHAIN OF CMD.
F. A REINSPECTION TO DETERMINE ADEQUACY OF FOLLOW UP CORRECTIVE ACTION. THE REINSPECTION WILL BE CONDUCTED APPROXIMATELY 15 DAYS AFTER THE ORIGINAL INSPECTION UNLESS OTHERWISE SPECIFIED IN THE INSPECTION REPT.

6. THE DIV HAZARDOUS WASTE DISPOSAL COORDINATOR (HWDC), CAPTAIN J. M. REUTER, WILL BE MAKING COURTESY VISITS TO ALL REGTS AND SEP BNS

IN THE FOLLOWING ORDER IN PREPARATION FOR THE NREA INSPECTION.

HQBN	17 NOV 86	1300
2D CBT ENGR CB	18 NOV 86	0800
2D TANK BN	19 NOV 86	0800
2D LAV BN	20 NOV 86	0800
2D RECON BN	20 NOV 86	1300
2D AAV BN	21 NOV 86	0800
2D MAR REGT	21 NOV 86	1300
6TH MAR REGT	24 NOV 86	0800
8TH MAR REGT	DATE AND TIME TO BE DETERMINED	
10TH MAR REGT	24 NOV 86	1300

7. POCIS ARE CAPT J. REUTER OR MSGT VELEZ AT EXT 2417/2755 FOR FURTHER INFORMATION.

BT

File

Betsy has copy 16 Dec 86

6280/2
FAC
26 NOV 1986

From: Commanding Gen ...se, Camp Lejeune
To: Commanding Off... ...r Station, New River, Jacksonville, N... ...5001

Subj: REQUEST FOR ANAL... ...HAZARDOUS MATERIAL

Ref: (a) CO MCAS ltr 6280 GSO of 17 Oct 1986

1. The reference requested analysis of the contents of 18 containers for hazardous waste characteristics. Tests of unknowns suspected of being hazardous waste include corrosivity, ignitibility, reactivity, E. P. toxicity for metals and total organic halogen content. Analysis is done by a contract laboratory at a cost to the U. S. Government of approximately $600.00 per sample. Total cost to analyze the contents of these 18 containers is approximately $10,800.

2. The Natural Resources and Environmental Affairs Division, Marine Corps Base, budgets annually for hazardous waste and groundwater monitoring and testing to support those instances when unknown substances are uncovered. Hazardous waste generation site personnel are responsible for the proper identification, handling, use, storage and packaging for disposal of material and hazardous waste generated from use of such material. Improper procedures resulting in the accumulation of large volumes of unknown material that must then be tested are not budgeted for by Marine Corps Base.

3. It is requested that funds in the amount of $10,800 be provided to Marine Corps Base to support the cost of the testing required. Point of contact is Mr. Danny Sharpe, extension 5003/2083.

T. J. DALZELL
By direction

Blind copy to:
COMP
NREAD

6280/2
FAC
26 NOV 1986

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commanding Officer, Marine Corps Air Station, New River, Jacksonville, North Carolina 28545-5001

Subj: REQUEST FOR ANALYSIS OF HAZARDOUS MATERIAL

Ref: (a) CO MCAS ltr 6280 GSO of 17 Oct 1986

1. The reference requested analysis of the contents of 18 containers for hazardous waste characteristics. Tests of unknowns suspected of being hazardous waste include corrosivity, ignitibility, reactivity, E. P. toxicity for metals and total organic halogen content. Analysis is done by a contract laboratory at a cost to the U. S. Government of approximately $600.00 per sample. Total cost to analyze the contents of these 18 containers is approximately $10,800.

2. The Natural Resources and Environmental Affairs Division, Marine Corps Base, budgets annually for hazardous waste and groundwater monitoring and testing to support those instances when unknown substances are uncovered. Hazardous waste generation site personnel are responsible for the proper identification, handling, use, storage and packaging for disposal of material and hazardous waste generated from use of such material. Improper procedures resulting in the accumulation of large volumes of unknown material that must then be tested are not budgeted for by Marine Corps Base.

3. It is requested that funds in the amount of $10,800 be provided to Marine Corps Base to support the cost of the testing required. Point of contact is Mr. Danny Sharpe, extension 5003/2083.

T. J. DALZELL
By direction

Blind copy to:
COMP
NREAD

D08

6241/1
NREAD
30 Oct 86

From: Supervisory Chemist, Water Quality Control Laboratory, Environmental Branch, Natural Resources and Environmental Affairs Division
To: Director, Natural Resources and Environmental Affairs Division

Subj: MCAS-New River's Request for Analysis

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

1. The reference requests analysis of 18 barrels or cans located at three different locations at the Marine Corps Air Station, New River. Two of the locations were visited on 27 October 1986 by myself and Tom Barbee.

2. The turn-in documents enclosed in the reference state that these 18 container contents are unknown. Presently, we analyze unknowns for Hazardous Waste Characteristics (Corrosivity, Ignitibility, Reactivity and E. P. Toxicity for metals) and Total Organic Halogen content. This will cost approximately $600 per sample, for a total cost of approximately $10,800. The sampling will require mason jars which the lab has to order. We only have 16 on hand.

3. Before the samples can be taken, arrangements will need to be for analysis. Previously, we have sent the samples to LANTDIV's contract lab. However, this year we will probably have to have prior permission and forward funds ahead of time. The other choice is to contract our own laboratory but this will take at least one month, for bids. The $10,800 is about 30% of our requested FY-87 funds for hazardous waste and groundwater monitoring, provided we receive all the funds we asked for.

3. The Ground Safety Office at the Air Station will have to make sure all the containers are on the ground, in an open area (outdoors-fresh air), and are resealable before we can sample. The Ground Safety Office will also have to arrange for the Fire Department to stand by at the sampling site during the sampling.

Elizabeth A. Betz

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

IN REPLY REFER TO:
6280
GSO
OCT 17 1986

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: REQUEST FOR ANALYSIS OF HAZARDOUS MATERIAL

Encl: (1) Turn-in documents

1. The enclosure represents turn-in documents from Marine Aircraft Group 26 and Marine Aircraft Group 29 for hazardous materials that are unidentifiable. It is requested that a sampling be made of each container and an analysis performed so that disposal action may be initiated.

2. Point of contact is Mary Wheat, extensions 6506 or 6686.

M. W. BOLISH
By direction

File Haz Waste Notes — State/Base Mtgs

Jill

Mr Rhodes
Comment Agreement
Manifest - What was done - Numbers
Simple things done
Long Term - to be accomplished
will permit change be considered minor? - Clear with Permit Staff
Doesn't care to open permit
Hedging on 90 days - Mgmt Plan (Contractor)
* Stick with 90 day with paragraph to address
Waste oil ? Leave out? May want to leave out.
Real time review - so see what they can incorporate into what State wants
will be problem getting everything done within 90 days
Modify contingency plan anytime determined it is inadequate [Minor]
* All Generator sites should have list of spec procedures [Site SOP Specific]
Base order seems to be adequate
Inspection form 7 of 19 (good) proposed order
* Main concern is when everything will be in compliance
Make plan site specific desk top procedure
Back up personnel.
HMDC - Base, DIV, 2DFSSG, Hospital, Dental Center } Have had training sessions with some EPA Ltrs
HMDO - Base or Company level
Emergency coordinators at Generator site ?
Fire Dept On Scene Commander — NREAD On Scene Coordinator

State Add Language Introductory authority Expand on ref section Factor on Inspection.
Put in form that State normally uses.
Send back to Base for review if we (Base) agree sign

Most prone delay in compliance is beyond company control

* If State wants to drop waste oil (page 6 of agreement) probably wouldn't have problem meeting deadlines.

Interest in results

Meting 10 Sept 86

1 Consent Order
2 90 days is about up
3 Air Station

} State Concerns

Air Station is separate generator
Responsibility to comply with laws + Reg
State wants to know who is Resp for AS by Friday
AS is generator Transporter, Disposer
AS. non continuous

Air Station Decision
Generator - Register - Separate identity

Morehead City
Wilmington

} Port operations

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U U N C L A S S I F I E D U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

ROUTINE

R 221545Z DEC 86

FM CG MCB CAMP LEJEUNE NC

TO CG SECOND MARDIV
CG SIXTH MAB
NAVHOSP CAMP LEJEUNE NC
MCAS NEW RIVER NC
CG SECOND FSSG
CG II MAF
NAVDENCLINIC CAMP LEJEUNE NC

INFO MCB CAMP LEJEUNE NC

UNCLAS //N06280//

SUBJ: ENVIRONMENTAL PROTECTION AGENCY (EPA) AND DIVISION OF HEALTH SERVICES (DHS) HAZARDOUS WASTE (HW) INSPECTION OF 26-27 JUN 1986

A. BO 6240.5

1. ADDRESSEES ARE ADVISED THAT EPA AND DHS HAVE PROPOSED A REINSPECTION TO DETERMINE THE EFFECTIVENESS OF LOCAL ACTION TAKEN TO CORRECT DISCREPANCIES IDENTIFIED DURING THE SUBJ INSPECTION. FACILITIES VISITED DURING THE SUBJ INSPECTION SHOULD ANTICIPATE EPA AND DHS REINSPECTION. THE REINSPECTION IS PLANNED DURING OR SHORTLY AFTER THE SECOND WEEK OF JANUARY 1987.

2. THE REF ESTABLISHES LOCAL PROCEDURES FOR HW MGT. HAZARDOUS MATERIAL DISPOSAL COORDINATORS ESTABLISHED WITHIN ADDRESSEE'S CMDS ARE REQUESTED TO NOTIFY THIS CMD (ATTN: AC/S FAC) IN WRITING OF ADDITIONAL SUPPORT AND TECHNICAL ASSISTANCE REQUIRED TO CORRECT DISCREPANCIES IDENTIFIED DURING THE SUBJ INSPECTION AND TO PROVIDE COMPLIANCE WITH THE REF.

DLVR:CG SIXTH MAB(6)...ACT
DLVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...ACT
DLVR:NAVHOSP CAMP LEJEUNE NC(4)...ACT

BFAC(2)...ORIG FOR CG MCB CAMP LEJEUNE(130) 06280/15/0179
BTMO(1) BFAC(1) BCOS(1) BCEO(1) OICB(1) CEOB(1) SSTF(85) GSTF(12) OCDR(14) DRMO(1) FMSS(1) BITS(1) MCES(1) BRSU(1) RRDT(1) SPBN(4) HQBN(1)

CEO(1)...ACT FOR CG II MAF(3) /12/
S-S(1) CFU(1)

RTD:000-142/COPIES:0147

586212/356 1 OF 2 MATA0380 356/20:22Z 221545Z DEC 86
CSN:VDTE00045 CG MCB CAMP LE

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U U N C L A S S I F I E D U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

3. POC WITH THIS MATTER IS MR. DANNY SHARPE, NREA, EXT 2083/2195.

BT

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 12-11-86

TO:

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

ATTN: Mr Wooten

1. Attached is forwarded for ~~info/action~~. comments & recommendations.

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

3. Your file copy.

BWBoston
By dir

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

ROUTING - REQUEST

Please
- ☐ READ
- ☐ HANDLE
- ☐ APPROVE

and
- ☐ FORWARD
- ☐ RETURN
- ☐ KEEP OR DISCARD
- ☐ REVIEW WITH ME

Date _____

To: Twylah
Make a copy for Dan
Done
Thanks 16 Dec 86 Julie

From _____

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 12-11-86

TO:

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

ATTN: Mr Wooten

1. Attached is forwarded for ~~information~~. comments & recommendations.

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)

ROUTING AND TRANSMITTAL SLIP

Date: 12-09-86

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. AC/S Facilities		
2. Attn: Col Dalzell		
3.		
4.		
5.		

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

REMARKS

The attached is forwarded for your info. I dont know how wide of dissemination we want to go on this as the decision has not been made to eleminate the 90 day exemption at this time. If you feel I should go with a missage to generators I'd appreciate it if you would give me a call.

Thanks

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.
Nadine, DRMO	Phone No. 5652

5041-102

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

☆ U.S. GOVERNMENT PRINTING OFFICE : 1982 O - 361-529 (214)

RECEIVED
11 DEC 1986

DEFENSE LOGISTICS AGENCY

Inter-Office Memorandum

IN REPLY REFER TO DRMR-MCH (A. Battle/(AV)683-6909/ps) 26 NOV 1986

SUBJECT: Change to RCRA Small Quantity Generator Requirements and 90 Day Accumulation Rule

TO: Chiefs of DRMOs

1. Reference: DRMS-HT letter, 20 Oct 86, subject as above. (NOTAL)

2. EPA published the final rule on small quantity generator requirements in the March 24, 1986, Federal Register. That rule brought the 100-1000 kg/mo generators under the hazardous waste regulatory program. On 22 Sept 86, the generator standards (Part 262 of 40 CFR) went into effect which have a potential impact on all small quantity generators. The final rule is summarized below:

a. Generators of 100-1000 kg. of hazardous waste per calendar month are now required to:

1. Determine whether their wastes are hazardous;

2. Apply and obtain an EPA identification number;

3. Store hazardous waste on-site for not more than 180 days (270 days if the waste must be transported more than 200 miles for ultimate disposal) in compliance;

4. Offer their wastes to only transporters and facilities with an EPA identification number;

5. Comply with applicable DOT requirements for shipping waste off-site;

6. Use a uniform hazardous waste manifest (or the appropriate state uniform manifest) to accompany the waste to its final destination; and

7. Maintain copies of manifests for three years;

8. Make a certification of waste minimization efforts.

3. Though under current RCRA Regulations, facilities which accumulate and store waste for less than 90 days are exempt from permitting requirements, the 14 Jul 86 Federal Register indicated EPA is proposing to modify or eliminate this exemption. Their basis is that the potential for spills/releases from 90 day accumulation tanks or containers may be as great as for fully regulated tanks and containers.

SUBJECT: Change to RCRA Small Quantity Generator Requirements and 90 Day Accumulation Rule

4. DRMO Chiefs are hereby requested to ensure perpetuation of this information to the user level. Should there be questions/comments, point of contact at the Memphis Region is Angella Battle, (AV)683-6910.

Fred Hamann

FRED C. HAMANN
Chief, Environmental Branch

T-6240

6240
NREAD
25 Jun 86

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: PCB TRANSFORMER AT LEJEUNE HIGH SCHOOL

1. On 20 June 1986, the subject transformer was discovered to have a small leak. An estimated 2-4 ounces of liquid coolant had seeped from the transformer. The seepage was attributed to heat buildup in the coolant. All of the liquids were adhered to the surface of the transformer and a cork pad it rested on.

2. The Base Fire Protection Division (BFPD) discovered the leak during routine followup on notifications by Base Maintenance Division (BMD) of the presence of the PCB transformers at the high school. Personnel from the Electric Shop, BMD, disconnected the power source, cleaned up the PCB and patched the seals. They also corrected a problem with incoming lines which was causing a minor electric arc. The electric arc was not believed to be related to the PCB problem. An absence of relatively destructive ~~order~~ odor raised some question as to whether the coolant contained PCB.

3. The problem was well handled by both BMD and BFPD. The spill was not large enough to require reports to regulatory agencies. BMD and NREAD personnel will be sampling transformers to determine actual PCB content. BMD is checking transformer to ensure patchwork was successful.

JULIAN I. WOOTEN

T-6240

6240
NREAD
2 Jun 86

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

Subj: INSPECTION REPORT ON LONG TERM HAZARDOUS WASTE STORAGE FACILITIES AT BUILDINGS TP-451 and TC-863

Ref: (a) Onsite inspection by Mr. Becker, NREAD, and Mr. Eggers, DRMO
(b) CG MCB ltr FAC/REA/hf 6280 of 15 Jul 83

Encl: (1) Inspection Checklist for Long Term Hazardous Waste Storage Facilities at Buildings TP-451 and TC-863

1. The enclosure provides results of reference (a) as required by reference (b). There are several hazardous waste labels that still require filling out, as noted during the May 1986 inspection.

2. Point of contact in this matter is Mr. Danny Becker, NREAD, extensions 5003/2083.

JULIAN I. WOOTEN
By direction

Copy to:
AC/S FAC
BFIRECHIEF
SJA
BMO
BSAFETYMGR

INSPECTION CHECKLIST FOR LONG TERM HAZARDOUS WASTE/MATERIALS STORAGE FACILITIES AT TP-451/TC/863

PARTICIPANTS Becker, Eggers DATE: 17 Jun 86

FACILITIES AND EQUIPMENT	SAT	UNSAT	COMMENTS
1. FACILITY GROUNDS	X		
2. FACILITY SECURITY (LOCKS, DOORS, SIGNS, ETC.)	X		
3. EMERGENCY TELEPHONE AND FIRE ALARMS	X		
4. UNLOADING PAD DRAIN VALVE	X		
5. EXHAUST FANS	X		
6. INTERIOR LIGHTING AND ELECTRICAL OUTLETS	X		
7. SAFETY SHOWERS/ EYE LAVAGES	X		
8. CURBS, GRATES, OTHER FIXTURES	X		
9. NON-SPARKING SHOVELS (2)	X		
10. ABSORBENT (EQUIVALENT OF FOUR 55-GAL BARRELS)	X		
11. HAZ MAT PUMPS OR EQUIVALENT	X		
12. FIRE EXTINGUISHERS	X		
13. PROTECTIVE GEAR AND EQUIPMENT	X		

OPERATIONAL CONSIDERATIONS	SAT	UNSAT	COMMENTS
1. Required operator inspections and Inspection Log	x		
2. Emergency Contingency Plan Posting & Operator Familiarity	x		
3. Fire Department Phone number posting	x		
4. Condition of containers in use	x		
5. Presence of odors/vapors, residues in sumps, deck, etc.	x		
6. Unloading Pad Valve Operation	x		
7. Compatibility of Material Storage	x		
8. Implementation of previously recommended corrective action	x		Still have a copple of labels to fill out that were missed.
9. Facility Operators since last Inspection			George Eggers

ADDITIONAL COMMENTS, EXPLANATIONS, ETC: Need to make sure that all hazardous waste labels are filled out when custody is accepted.

T-6240

6241/1
NREAD

JUN 24 1986

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

Subj: DISPOSAL OF BARREL AT BUILDING A-2

Encl: (1) CO, 2d AAVDB ltr 5000 S-4/MAINT of 24 Oct 85
(2) JTC Environmental Consultants, Inc. Report No. 252 of 23 Apr 1986
(3) Hazardous Waste Characteristic Analysis of the Barrel at AMTRACS datd 19 Jun 1986

1. Enclosure (1) advised that the 2d Assault Amphibian Battalion (2d AAVBN) has one 55-gallon drum containing used electrolyte, sodium bicarbonate and an unknown substance needing analysis and disposal. Enclosure (2) is the analysis, performed by JTC Environmental Consultants (Sample #86-01). Enclosure (3) summarizes the applicable data in enclosure (2).

2. The unknown substance was originally suspected to be an organic solvent, however, none were detected. Based on the analysis and appearance, the barrel appears to be battery acid that has been contaminated with oil.

3. It is recommended this barrel be neutralized and discharged into an oil and water separator connected to the sanitary sewer. By copy of this letter, 2dAAVBN is advised to contact the Utilities Director, Base Maintenance Division, for assistance with diposal of this barrel.

4. NREAD point of contact in this matter is Ms. Elizabeth Betz, x5977.

JULIAN I. WOOTEN

Copy to:
2d AAVBN
2dMARDIV HMDC

T-12000

12000
NREAD

22 Aug 1985

Jude
These have to do with Sandra's upgrade. Can you file them back in the appropriate place for me? Thanks. Ate

Director, Nat[illegible] Environmental Affairs Division,
Marine Corps
Assistant Chi[illegible]ies, Marine Corps Base, Camp
Lejeune

HQMC ON-SITE MANPOWER SURVEY OF MARINE CORPS BASE, CAMP LEJEUNE

Ref: (a) AC/S FAC Memo 5320 FAC of 24 Jul 1985
(b) NREAD Memo 12000/NREAD of 31 July 1985
(c) AC/S FAC Staff Meeting of 13 Aug 1985

1. Reference (a) requested NREAD manpower requirements. Reference (b) provided Environmental and Forestry Branch requirements and comments.

2. In accordance with discussion during reference (c), the following requirement is provided:

ENGLISH DESCRIPTION	BILL SPON	ALPHA GRADE	MOS	FTN	BRN	TYP	STA	CIV
Wildlife Tech		GS-9	0404		C	G		1

3. It is recommended that Line 781, Wildlife Technician/Military be changed from current designation to civilian billet as follows:

ENGLISH DESCRIPTION	BILL SPON	ALPHA GRADE	MOS	FTN	BRN	TYP	STA	CIV
Wildlife Tech		GS-7	0404		C	G		2

J. I. WOOTEN

T-12080

12000
NREAD

22 Aug 1985

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

HQMC ON-SITE MANPOWER SURVEY OF MARINE CORPS BASE, CAMP LEJEUNE

Ref: (a) AC/S FAC Memo 5320 FAC of 24 Jul 1985
(b) NREAD Memo 12000/NREAD of 31 July 1985
(c) AC/S FAC Staff Meeting of 13 Aug 1985

1. Reference (a) requested NREAD manpower requirements. Reference (b) provided Environmental and Forestry Branch requirements and comments.

2. In accordance with discussion during reference (c), the following requirement is provided:

ENGLISH DESCRIPTION	BILL SPON	ALPHA GRADE	MOS	FTN	BRN	TYP	STA	CIV
Wildlife Tech		GS-9	0404		C	G		1

3. It is recommended that Line 781, Wildlife Technician/Military be changed from current designation to civilian billet as follows:

ENGLISH DESCRIPTION	BILL SPON	ALPHA GRADE	MOS	FTN	BRN	TYP	STA	CIV
Wildlife Tech		GS-7	0404		C	G		2

J. I. WOOTEN

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

12 Aug 85
Date

From: Director
To: Tayloh

What did we submit

DLW

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

5320
FAC
24 JUL 1985

FIRST ENDORSEMENT on CG MCB ltr 5320 MANP of 22 July 1985

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

Subj: HQMC ON-SITE MANPOWER SURVEY OF MARINE CORPS BASE, CAMP LEJEUNE

1. Forwarded.

2. Please review the portions of the T/O which are pertinent to your divisions, as requested by the basic correspondence. Note short fuse; provide response to this office by COB 1 August 1985.

B. W. ELSTON
By direction

DISTRIBUTION:
CEO
FIRE
MAIN
DBH
DFH
NREA
PWO

NREA READ PAGE 86 & 87

Completed 31 July to FAC

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

IN REPLY REFER TO:
5320
MANP
22 July 85

From: Commanding General, Marine Corps Base, Camp Lejeune

Subj: HQMC ON-SITE MANPOWER SURVEY OF MARINE CORPS BASE, CAMP LEJEUNE, NC

Encl: (1) T/Os 7511, 7512, 7520, 7531, 7532, 7540, 7551, 7552, 7553, 7554, 7555, 7556, 7561, 7570, 7580

1. The HQMC On-Site Manpower Survey Team will visit this command 9-27 September 1985. In preparation for the manpower survey, the enclosure is forwarded for review.

2. Addressees are requested to review military and civilian billets delineated in the enclosure and verify accuracy of billet title, rank/grade, MOS/series and quantity. Any discrepancies should be identified.

3. In addition, addressees are requested to identify any additional manpower requirements. All requests must be accompanied by complete justification to include statistics and identification of all references.

4. The enclosure will be modified in accordance with the responses received as a result of this Table of Organization (T/O) review. The modified T/O will be provided to the survey team members for use in the conduct of the Manpower Survey. Therefore, the importance of this review and the resultant responses cannot be over emphasized.

NOTE: The enclosure is not a HQMC approved Table of Organization (T/O) and is therefore to be used only for the purpose of this review.

5. All T/O change requests and requests for additional manpower requirements are to be forwarded to this Headquarters (Attn: AC/S, Manpower) no later than close of business 5 August 1985. Extensions may not be granted. Short suspense is regretted, however unavoidable, due to limits imposed by HQMC.

6. Any questions or requests for assistance should be addressed to Mrs. Gayle Kennedy, extensions 2218/2220/2385.

J. B. AIROLA
By direction

Distribution:
AC/S, Compt
AC/S, Fac 8 copies
AC/S, MWR/FA
AC/S, BOSMAD
AC/S, Log
AC/S, Trng/Ops
CO, HqBn
CO, SptBn
CO, MCES
CO, MCSSS
CO, ITS
CO, FMSSS
CO, RSU
CO, RRDet
CO, MCB Brig
JPAO
Dir, RASC
BInsp
Mil Magistrate
PMO
SJA
Chaplain
CPD
MilPersO
OIC, Regional ACU
BADJ
SafetyO
PostalO
OIC, CDAC

EdW - 12-4-84

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

5000
FAC
20 NOV 1984

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

Subj: HQMC APPROVED TABLE OF ORGANIZATION 7500 FOR MARINE CORPS BASE, CAMP LEJEUNE

Encl: (1) CG MCB ltr 5320/85-3 MANP of 7 Nov 84

1. The enclosure contains an extract of your portion of the new Table of Organization and is provided for your information and review. Requests for changes should be submitted to this office by 7 Dec 1984 with full justification as pointed out in the enclosure. Negative replies may be telephoned.

B. W. ELSTON
By direction

DISTRIBUTION:
NREA
CEO
PWO
FIRE
DUPH
DFH
MAIN

I talked with Col Lilley this AM during performance review about a perm GS-3. He is going to discuss with AC/S Manpower.

15-11-84

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

IN REPLY REFER TO
5320/85-3
MANP
7 Nov 84

From: Commanding General, Marine Corps Base, Camp Lejeune

Subj: HQMC APPROVED TABLE OF ORGANIZATION 7500 FOR MARINE CORPS BASE CAMP LEJEUNE

Encl: (1) T/Os 7511, 7512, 7520, 7531, 7532, 7540, 7551, 7552, 7553, 7554, 7555, 7556, 7561, 7570, 7580

1. The enclosure provides the latest HQMC approved Tables of Organization (T/Os) for Marine Corps Base Camp Lejeune and should be utilized for any formal correspondence/fitness reports generated by this command.

2. Position Administrators in receipt of previously approved correspondence from this Headquarters which reflect any modifications to the enclosure should make the appropriate pen changes. These locally approved changes remain in effect pending approval/disapproval from HQMC during the next T/O update cycle.

3. The HQMC On-Site Survey Team will visit this command during 2d quarter FY-85. In order to provide survey team members with up-to-date requirements, it is recommended addressees review the enclosure and forward any T/O changes/requests to this Headquarters (Attn: AC/S, Manpower) by close of business 10 December 1984. All changes/requests should include complete justification to include statistics as well as work load indicators and identification of all references. Any changes/requests submitted after 10 December 1984 will be held until completion of the survey. Negative replies are required.

4. Any questions regarding T/O changes/requests should be addressed to Mrs. Gayle Kennedy, extensions 2218/2220/2385.

D. W. COLLINS
By direction

Distribution:
AC/S, Compt
AC/S, Fac
AC/S, PersSvcs
AC/S, BOSMAD
AC/S, Log
AC/S, Trng/Ops
AC/S, SpecSvcs
CO, HqBn
CO, SptBn
CO, MCES
CO, MCSSS
CO, ITS
CO, FMSS
CO, RSU
CO, RR Det
CO, Corr Fac
JPAO
Dir, RASC
BInsp
PMO
SJA
Chaplain
CPD
MilPersO

T/O 7531 SUPPORT BN,MCB,CLNC

T/E NO T/MRCA 098740

LINE NO.		ENGLISH DESCRIPTION	BILL SPCN	ALPHA GRADE	MOS	FTN	BRN	TYP	STA	MARINES OFF	MARINES ENL	OTHER SERVICES OFF	OTHER SERVICES ENL	CONT F/A OFF	CONT F/A ENL	CIV	SCN	PCN	EDU	SEP	SEC	LNG	SERV SCH	T/MRCA	EFF DATE	ADD DEL
748	*	FIREFIGHTER STRUCTURAL		GS 4	0081		C	G								7								098740		
749	*	INDUSTRIAL AREA SECTION																						098740		
750	*	SUPV FIREFIGHTER STRUCT		GS 6	0081		C	G								2								098740		
751	*	FIREFIGHTER STRUCTURAL		GS 5	0081		C	G								4								098740		
752	*	FIREFIGHTER STRUCTURAL		GS 4	0081		C	G								5								098740		
753	*	COURTHOUSE BAY SECTION																						098740		
754	*	SUPV FIREFIGHTER STRUCT		GS 6	0081		C	G								2								098740		
755	*	FIREFIGHTER STRUCTURAL		GS 5	0081		C	G								4								098740		
756	*	FIREFIGHTER STRUCTURAL		GS 4	0081		C	G								5								098740		
757	*	MCAS(H) SECTION																						098740		
758	*	SUPV FIREFIGHTER STRUCT		GS 6	0081		C	G								2								098740		
759	*	FIREFIGHTER STRUCTURAL		GS 5	0081		C	G								2								098740		
760	*	FIREFIGHTER STRUCTURAL		GS 4	0081		C	G								7								098740		
761	*	CAMP GEIGER SECTION																						098740		
762	*	SUPV FIREFIGHTER STRUCT		GS 6	0081		C	G								2								098740		
763	*	FIREFIGHTER STRUCTURAL		GS 5	0081		C	G								4								098740		
764	*	FIREFIGHTER STRUCTURAL		GS 4	0081		C	G								5								098740		
765	*	CAMP JOHNSON SECTION																						098740		
766	*	SUPV FIREFIGHTER STRUCT		GS 6	0081		C	G								2								098740		
767	*	FIREFIGHTER STRUCTURAL		GS 5	0081		C	G								2								098740		
768	*	FIREFIGHTER STRUCTURAL		GS 4	0081		C	G								7								098740		
769	*	RIFLE RANGE SECTION																						098740		
770	*	SUPV FIREFIGHTER STRUCT		GS 6	0081		C	G								2								098740		
771	*	FIREFIGHTER STRUCTURAL		GS 5	0081		C	G								2								098740		
772	*	FIREFIGHTER STRUCTURAL		GS 4	0081		C	G								7								098740		
		SECTION TOTAL US CIVILIAN														133										
772A	*	NAT RES & ENVIR AFF BR																						098740		
772B	*	NATURAL RESOURCES MGR		GS12	0401		C	G								1								098740		
772C	*	SECRETARY (TYPING)		GS 5	0318		C	G								1								098740		
772D	*	CLERK TYPIST		GS 3	0322	Z	C	G	X															098740		
772E	*	FORESTRY SECTION																						098740		
772F	*	FORESTER (ADMIN)		GS11	0460		C	G								1								098740		
772G	*	SUPERVISORY FORESTER		GS 9	0460		C	G								1								098740		
772H	*	FORESTER	*	GS 9	0460		C	G								1								098740		
772I	*	FORESTRY TECHNICIAN		GS 7	0460		C	G								1								098740		
772J	*	FORESTRY TECHNICIAN	*	GS 5	0460		C	G								1								098740		
772K	*	FORESTRY TECHNICIAN		GS 5	0460		C	G								1								098740		

T/O 7531 SUPPORT BN,MCB,CLNC

T/E NO T/MRCA 098740

LINE NO.	ENGLISH DESCRIPTION	BILL SPON	ALPHA GRADE	MOS	F TR N	B TY N	T YP P	S TA A	MARINES OFF	MARINES ENL	OTHER SERVICES OFF	OTHER SERVICES ENL	CONT F/A OFF	CONT F/A ENL	CIV	SC C	WP N	EDU	SEP P	SC C	LNG	SERV SCH	T/MRCA	EFF DATE	ADD DEL
772L*	FORESTRY TECHNICIAN		GS 4	0460		C	G								2								098740		
772M*	FORESTRY TECHNICIAN	*	GS 4	0460		C	G								2								098740		
772N*	FORESTRY TECHNICIAN		GS 4	0460	Z	C	G	X															098740		
7720*	FORESTRY AID		GS 3	0462		C	G								1								098740		
772P*	FISH & WILDLIFE SECTION																						098740		
772Q*	SUPV BIO TECH(WILDLIFE)		GS11	0404		C	G								1								098740		
772R*	BIOLOGIST (WILDLIFE)	*	GS 9	0486		C	G								1								098740		
772S*	BIO TECH (WILDLIFE)		GS 7	0404		C	G								1								098740		
772T*	ASST GAME PROTECTOR		SSGT	5811		M	E		1								P						098740		
772U*	ASST GAME PROTECTOR		SGT	5811		M	E		1								M						098740		
772V*	ASST GAME PROTECTOR		CPL	5811		M	E		1								M						098740		
772W*	ASST GAME PROTECTOR	F	CPL	9916		M	E	F					1				-						098740		
772X*	ASST GAME PROTECTOR	D	CPL	9916		M	E	F					1				-						098740		
772Y*	ASST GAME PROTECTOR	F	LCPL	9916		M	E	F					1				-						098740		
772Z*	ASST GAME PROTECTOR	D	LCPL	9916		M	E	F					3				-						098740		
773 *	ADMIN CLERK		CPL	0151		M	E		1								M						098740		
773A*	SOIL, WATER & ENVIR SECT																						098740		
773B*	SUPVY ECOLOGIST		GS11	0408		C	G								1								098740		
773C*	ECOLOGIST	*	GS 9	0408		C	G								1								098740		
773D*	SOIL CONSV TECH		GS 6	0458	Z	C	G																098740		
773E*	QUALITY CONTROL UNIT																						098740		
773F*	SUPVY CHEMIST		GS10	1320		C	G								1								098740		
773G*	PHYSICAL SCIENCE TECH		GS 7	1311		C	G								1								098740		
773H*	PHYSICAL SCIENCE TECH		GS 6	1311		C	G								2								098740		
773I*	PHYSICAL SCIENCE TECH		GS 5	1311		C	G								1								098740		
	SECTION TOTAL																								
	MARINE								4																
	FLEET ASSIST												6												
	US CIVILIAN														24										
775 *	BASE MAINTENANCE DIVISION																						098740		
776 *	BASE MAINTENANCE OFFICER		COL	9630		M	O			1							P						098740		
777 *	MAINTENANCE MGR		GM14	1601		C	G								1								098740		
778 *	MAINTENANCE NCO		MSGT	1371		M	E		1								P						098740		
778A*	POLICE NCO ASSISTANT	D	CPL	8911		M	E	F					5				-						098740		
778B*	BLDG & GRNDS MAN	D	LCPL	8911		M	E	F					4				-						098740		
778C*	BLDG & GRNDS MAN	F	LCPL	8911		M	E	F					2				-						098740		
778D*	REPAIRMAN	D	LCPL	9916	Z	M	E	F					3				-						098740		
778E*	REPAIRMAN	F	LCPL	9916	Z	M	E	F					1				-						098740		

T-12000

12000
NREAD

29 Aug 1985

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

NREAD STAFF; ADDITIONAL REQUIREMENTS

Ref: (a) Dir, NREAD ltr 12000 NREAD of 22 Aug 1985

Encl: (1) Supervisory Base Wildlife Manager, NREAD ltr 12000 NREAD of 28 Aug 1985

1. The reference identified additional staff requirements necessary to accomplish the increasing NREAD workload.

2. Accordingly, it is recommended that the Assistant Chief of Staff, BOSMAD review the NREAD requirement by 26 September 1985, addressed in more detail in enclosure (1), so appropriate personnel action can be initiated.

J. I. WOOTEN

Writer: C. D. Peterson, NREAD 5003
Typist: J. Cross 29Aug85

ENCLOSURE (1)

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

DEPARTMENT OF THE NAVY

Memorandum

12000
NREAD

DATE: 28 Aug 1985

FROM: Supervisory Base Wildlife Manager

TO: Director, Natural Resources and Environmental Affairs Division

SUBJ: FISH AND WILDLIFE BRANCH PERSONNEL REQUIREMENTS

Ref: (a) Endangered Species Act
(b) Endangered Red-cockaded Woodpecker Research

Encl: (1) Draft PD for proposed temporary Wildlife Technician Billet
(2) Draft Performance Standards for Position

1. Reference (a) requires interagency cooperation by federal agencies to ensure that any action authorized, funded or carried out by such agency is not likely to jeopardize the continued existence of any endangered or threatened species. Marine Corps Base has funded a research study of the endangered Red-cockaded Woodpecker and its associated habitat to determine the current status of this endangered species consistent with applicable regulations.

2. The purpose of this letter is to formally initiate action to implement the responsibility of coordinating this research and to handle increases in the workload of the Fish and Wildlife Branch. This package addresses the following issues:

a. Responsibility for coordinating the endangered Red-cockaded Woodpecker research study which is scheduled to begin during FY-86. This research will continue for 2-3 years through contractual procedures with the Department of Zoology, North Carolina State University, Raleigh, North Carolina.

b. Provide for technical assistance for the research in collecting base line data that will permit an assessment of the current health of the population of the Red-cockaded Woodpecker and will provide a basis for comparison in the future.

c. Assure safe entry to training areas where live firing ranges may be in operation by accompanying research personnel in the field on a daily or frequently scheduled basis.

d. Implementation of branch operations dealing with the management of fish, game, nongame, threatened and endangered species habitat monitoring and the recreational use of wildlife resources.

3. Enclosure (1) provides additional technical capability to address the requirements contained in paragraphs 1 and 2 above. Enclosure (2) contains performance standards designed for the position.

C. D. PETERSON

ENCLOSURE (1)

POSITION DESCRIPTION *(Please Read Instructions on the Back)*

1. Agency Position No.

2. Reason for Submission: [ ] Redescription [ ] Reestablishment [X] New [ ] Other
Explanation *(Show any positions replaced)*
Biological Technician (Wildlife) GS-404-9

3. Service: [ ] Dept'l [ ] Field

4. Employing Office Location: Camp Lejeune, NC

5. Duty Station

6. CSC Certification No.

7. Fair Labor Standards Act: [ ] Exempt [ ] Nonexempt

8. Employment/Financial Stmt Required: [ ] Yes [ ] No

9. Subject to IA Action: [ ] Yes [ ] No

10. Position Status: [X] Competitive [ ] Excepted *(Specify)*

11. Position is: [ ] Supvrsry [ ] Managerial [ ] Neither

12. Sensitivity: [ ] Critical [ ] Noncritical [X] Nonsensitive

13. Competitive Level Code

14. Agency Use

15. Classified/Graded by	Official Title of Position	Pay Plan	Occupational Code	Grade	Initials	Date
a. Civil Service Commission						
b. Department, Agency, or Establishment						
c. Bureau						
d. Field Office						
e. Recommended by Supervisor or Initiating Office						

16. Organizational Title of Position *(if different from official title)*

17. Name of Employee *(if vacancy, specify)*

18. Department, Agency, or Establishment: Marine Corps Base, Camp Lejeune, NC

a. First Subdivision: Facilities Department

b. Second Subdivision: Natural Resources & Environmental Afs Div

c. Third Subdivision: Fish and Wildlife Branch

d. Fourth Subdivision

e. Fifth Subdivision

19. Employee Review. *This is an accurate description of the major duties and responsibilities of my position.*
Signature of Employee *(optional)*

20. **Supervisory Certification.** *I certify that this is an accurate statement of the major duties and responsibilities of this position and its organizational relationships, and that the position is necessary to carry out Government functions for which I am responsible. This certification is made with the knowledge that this information is to be used for statutory purposes relating to appointment and payment of public funds, and that false or misleading statements may constitute violations of such statutes or their implementing regulations.*

a. Typed Name and Title of Immediate Supervisor: CHARLES D. PETERSON, Supvy Bio Tech
Signature: Charles D. Peterson Date: 16 Aug 85

b. Typed Name and Title of Higher-Level Supervisor or Manager *(optional)*: JULIAN I. WOOTEN, Natural Resources Mgr
Signature: Julian I Wooten Date: 16 Aug 85

21. **Classification/Job Grading Certification.** *I certify that this position has been classified/graded as required by Title 5, U. S. Code, in conformance with standards published by the Civil Service Commission or, if no published standards apply directly, consistently with the most applicable published standards.*
Typed Name and Title of Official Taking Action
Signature Date

22. Standards Used in Classifying/Grading Position

Information for Employees. The standards, and information on their application, are available in the personnel office. The classification of the position may be reviewed and corrected by the agency or the Civil Service Commission. Information on classification/job grading appeals, and complaints on exemption from FLSA, is available from the personnel office or the Commission.

23. Position Review	Initials	Date	Initials	Date	Initials	Date	Initials	Date	Initials	Date
a. Employee *(optional)*										
b. Supervisor										
c. Classifier										

24. Remarks

25. Description of Major Duties and Responsibilities *(see attached)*

I. INTRODUCTION

This position is located in the Fish and Wildlife Branch, Natural Resources and Environmental Affairs Division, Assistant Chief of Staff, Facilities Section, Marine Corps Base, Camp Lejeune, North Carolina. The incumbent serves as primary assistant to the branch head in matters dealing with the management of fish, game, non-game, threatened and endangered species habitat monitoring and the recreational use of wildlife resources.

II. DUTIES

- Independently prepares annual operational plans on the basis of overall objectives outlined by his supervisor consistent with the long-range fish and wildlife plan.

- On a continuing basis, plans, directs and/or coordinates all habitat development projects consistent with other land use practices. Completes work requests involving all such projects. Chooses methods and means for carrying out habitat development projects, including but not limited to establishing wildlife clearings, small game strips, planting forest access roads and ornamental seedlings, maintaining waterfowl impoundments and fresh water ponds for fishing. Determines frequency of observations to be made and date to be recorded.

- Assumes responsibility for coordinating the endangered Red-cockaded Woodpecker research study which is scheduled to begin during FY-1985. This research will continue for 2-3 years through contractual procedures with the Department of Zoology, North Caroling State University, Raleigh, North Carolina.

- Provides technical assistance for this research in collecting base line data that will permit an assessment of the current health of the population of Red-cockaded Woodpeckers and will provide a basis for comparison in the future.

- Accompanies research personnel in the field to assure safe entry to training areas where live firing ranges may be in operation.

- Performs various complex tasks associated with fish and wildlife population management projects, such as developing or adapting materials and methods needed for observation of fish and wildlife, collecting data, conducting tests or analyses, maintaining records, compiling data and preparing reports.

- Assists the Assistant Chief of Staff, Training Facilities personnel in conducting weekly inspections of endangered Red-cockaded Woodpecker habitat in Combat Town-TLZ Penguin areas. Conducts periodic inspections of Red-cockaded Woodpecker habitat in other areas of the Base. Drafts and submits detailed reports of weekly and periodic inspections concerning adverse impact to

the habitat accompanied by pertinent data and photographs. Reports must be accurate in detail for submission to the highest level of authority.

- Establishes systems for collecting public use data from hunters, fishermen, trappers and persons collecting firewood through centrally located checking stations. Analyzes data collected and completes summary reports for measuring public recreational use and wildlife trends.

- Trains lower grade employees in the technical activities of fish and wildlife management for implementation in the field.

FACTOR I - KNOWLEDGE REQUIRED BY THE POSITION

- Technical knowledge of modern fish and wildlife resource management principles and concepts in order to participate intensively in the management of the Branch.

- Practical knowledge of the social and economic considerations of natural resource activities involved in the position in order to make sound management decisions.

- Knowledge of the agricultural terms, data, structures, facilities and procedures to recognize the possible effect on fish and wildlife resources from military training exercises and other uses of base lands.

- Skill in developing wildlife management field plans, carrying them out, analyzing data and presenting its analysis in a form requiring a minimum of review and editing.

- Skill in evaluation of special problems related to fish and wildlife resource conservation.

- Skill in operating motorized equipment including four-wheeled drive vehicles, chainsaws, weedeaters and watercraft.

1. Supervisory Controls

Scope of the assignment, overall objectives, and the nature of the end product expected are specified by the supervisor. The incumbent is expected to select, apply and adapt standard techniques and practices in carrying out the assignment. Potential and actual sources of controversy are discussed with the supervisor. Work plans will be normally reviewed by the supervisor. The incumbent is expected to resolve routine problems in normal day-to-day operations of his work. Review of the work will evaluate accuracy, meeting established deadlines and adhering to existing policies and applicable regulations.

2. Guidelines

Well defined guidelines are available in the form of fish and wildlife management manuals, the statutory provision of applicable

legislation, Marine Corps directives, Base orders, and by policies and procedures specified in chain-of-command correspondence. The incumbent is expected to use good judgment in applying the available guidelines in carrying out fish and wildlife management activities, and adapting the guidelines to peculiar situations at the Base.

3. Complexity

Most assignments have some aspects which require the incumbent to interpret and implement existing methods, practices and instructions to generalize from several methods and techniques in carrying out specific activities; and to solve more complex problems. The incumbent is expected to perform several assignments concurrently.

4. Scope and Effect

The work effects the adequacy of fish and wildlife resource management in the field, consistent with the primary military training and other natural resources management uses and practices of the land.

5. Personal Contacts

Contacts are with other technical and professional natural resources personnel in the Natural Resources and Environmental Affairs Division; Base Maintenance Division; Training Facilities; State and Federal conservation agencies.

6. Purpose of Contacts

Contacts are for planning, implementing and inspecting work, conducting training sessions to explain conservation or use requirements, to monitor activities and to establish cooperative relationships.

7. Physical Demands

The work requires some physical exertion such as walking over wet, rough, uneven, or rocky surfaces; bending, crouching, stooping, stretching, reaching or similar activities. The work requires average agility and dexterity.

8. Work Environment

The work requires both office and outdoor work. The office is adequately lighted, heated and ventilated. Temperature and weather extremes may be encountered in the performance of the outdoor work. The incumbent is expected to conduct duties in a safe and orderly manner so as not to endanger self, fellow workers or property with which entrusted.

DEPARTMENT OF THE NAVY PERFORMANCE APPRAISAL
NAVSO 12430/9 (11-80) S/N 0104-LF-924-3045

NOTE: 1. Read special instructions before completing this form.
2. Remove instruction sheet before distribution.

Distributi

EMPLOYEE NAME *(last, first, middle initial)*	OFFICIAL POSITION TITLE
	Temporary Biological Technician
ORGANIZATION TITLE AND CODE	**DUTY STATION AND ADDRESS**
Fish and Wildlife Section, Natural Resources and Environmental Affairs Division	Marine Corps Base, Camp Lejeune

ELEMENT NUMBER	COLUMN A PERFORMANCE ELEMENT *(List performance elements below. Designate critical elements by entering "C" in the bracket below element no.)*	COLUMN B PERFORMANCE STANDARDS *(Indicate level, i.e., marginal, highly satisfa*
1. [C]	Fish and Wildlife Management	Highly Satisfactory Standard: Al projects are completed in or bef date within established guidelir Marginal Standard: Modification and re-work is not required for to 15 assignments per year.
2. [C]	Endangered and Threatened Species Management	Highly Satisfactory Standard: W are completed ahead of establish Reports are accurate and require modification or correction. Marginal Standard: Modificatior ions are required for assignment as much as 5 to 10 times per yea
3. [ ]		
4. [C]	Fish and Wildlife Resources Data Collection	Highly Satisfactory Standard: A is collected involving public u and wildlife resources with rep on or before the deadline date. Marginal Standard: Annual repo

REVIEWER

DATE	ATURE

COL. D	N C M RESULTS, CORRECTIVE ETC.	RATING

DEPARTMENT OF THE NAVY PERFORMANCE APPRAISAL
NAVSO 12430/9 (11-80) *Back*

ELEMENT NO	COLUMN A PERFORMANCE ELEMENT	COLUMN B PERFORMANCE STANDARDS	COLUM COMMENTS, PROGRESS REVIE ACTION,
5. [ ]		require 10 to 15 corrections per year.	
6. [C]	Responsible for coordinating Endangered Red-cockaded Woodpecker research study.	Highly Satisfactory Standard: Incumbent follows applicable guidelines with work assignments completed at least 90% of time within established deadlines with no more than 20% direct involvement by supervisor.	
7. [ ]		Marginal Standard: Incumbent follows applicable guidelines with work assignments completed less than 80% of time within established deadlines 20-30% direct involvement by the supervisor.	

RATING PERIOD FROM: TO: SUMMARY RATING

CERTIFICATION: ***Your signature indicates that a particular step has been completed and understood. Date your signature.***

APPRAISAL STAGES	EMPLOYEE		SUPERVISOR		
	SIGNATURE	DATE	SIGNATURE	DATE	SIGN
ELEMENTS/STANDARDS SET					
PROGRESS REVIEW(S)					
ANNUAL PERFORMANCE APPRAISAL					

OPNAV 5216/14-A (Rev. 8-81)
SN 0107-LF-052-2320

DEPARTMENT OF THE NAVY

Memorandum

DATE: 20 SEP 1985

FROM: Assistant Chief of Staff, Base Operational Support Management Assistance

TO: Assistant Chief of Staff, Facilities

SUBJ: NREAD STAFF; ADDITIONAL REQUIREMENTS

Ref: (a) Your memo of 20 Sep 85

1. The Natural Resources and Environmental Affairs Division is scheduled for an Efficiency Review during FY 1986. At that time personnel requirements for existing responsibilities and new responsibilities will be validated and appropriate staffing developed.

2. In view of your request, every effort will be made to initiate the Efficiency Review as quickly as personnel resources allow.

H. F. SMITH

Copy to:
MANP

ENCLOSURE (2)

MAK

ROUTING AND TRANSMITTAL SLIP

Date 10/4/88

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Pete Black		
2. Base Forester		
3. NREAD		
4.		
5.		

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

REMARKS

Advisory Classification in accordance with your request of 20 Sept 88,

Secretary (Typing)
GS-318-4

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.
C. Sampson	Phone No. 1532

5041-102 S/N 0107-LF-000-4100

☆U.S. GPO: 1986-704-009/46392

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

UNITED STATES MARINE CORPS
NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS DIVISION
MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA 28542-5001

IN REPLY REFER TO:

12000
NREAD
20 Sep 88

From: Director, Natural Resources and Environmental Affairs Division
To: Civilian Personnel Division, Marine Corps Base, Camp Lejeune (Attn: Classifications),

Subj: FORMAL POSITION CLASSIFICATION

Encl: (1) Position Description

1. The enclosed position description is provided for classification.

2. It is requested that this office be notified of your findings regarding this matter as soon as possible.

3. Point of contact for this matter is Mr. Peter E. Black, Base Forester, Natural Resources and Environmental Affairs Division, at extensions 2083/1690.

J. I. Wooten

J. I. WOOTEN

I. Introduction. This position is located in the Forestry Branch, Natural Resources and Environmental Affairs Division(NREAD), Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune. The primary purpose of this position is to provide skilled secretarial support and automated data processing to the Forestry, Fish and Wildlife, and Environmental Sections of NREAD. The incumbent is required to maintain, process and compile data and information to comply with natural resources and environmental reporting and record keeping requirements. The position is non-sensitive for security clearance purposes.

II. Major duties and responsibilities

a. Serves as a operator for the Land-Use Management System (LUMS) located in NREAD, Building 1103. The incumbent inputs raw data provided by various Natural Resources or Environmental professionals within the Division. The incumbent retrieves alphanumeric data and special data (maps) from LUMS when requested by the Division Director or Branch Heads.

b. Utilizes LUMS, Zenith Data System and manual methods to maintain records required by NREAD to comply with Marine Corps, Navy, Department of Defense, State and Federal regulations dealing with natural resources or environmental reports and records.

c. Retrieves information from manual or automated storage files, completes standard forms and drafts or routine reports and forwards the drafts and forms to the appropriate Natural Resources and Environmental Affairs Branch Head for review. Complex reports, such as the Annual Operational Plan, Conservation Report and Environmental Quality Report, are prepared in cooperation with the appropriate Branch Head with utilization of LUMS.

d. Maintains official files for NREAD, acts as Receptionist, keeps time cards, receives, processes and distributes incoming and outgoing correspondence, receives and screens telephone calls for NREAD, places long distance calls, composes correspondence for signature, receives radio communication, both routine and emergency and relays the information, while maintaining its integrity, to the appropriate person. The incumbent performs other secretarial and clerical duties as assigned, such as ensuring that correct punctuation, spelling and format is used, arranging travel orders and schedules, and ensures that motel accomendations are confirmed.

e. The incumbent types vouchers and requisitions ensuring accurate appropriations data and tracks the progress of the requisitions. Performs other duties as assigned.

Factor 1: Knowledge Required by the Position

The position requires skills in both written and oral communications; telephone and radio procedures; office machines such as calculators, typewriters, word processors and computer

equipment dealing with graphic and alpha numeric data and geographic information system; command of the rules of grammar; spelling and filing; and the format for various forms of Navy correspondence. The incumbent should have a knowledge of technical and scientific terminology related to natural resources and environmental management.

Factor 2: Supervisory Controls

The incumbent is under the direct supervision of the Administrative Forester, GS-12, and performs secretarial tasks for the Forestry, Fish and Wildlife, and Environmental branches, including the Branch Heads and their professional and technical staffs. The incumbent normally receives only general instructions as to priority and deadlines. The incumbent uses personal initiative and judgement to schedule work within established priorities, precedents and procedures, and consults with the supervisor only if assignments conflict otherwise.

Factor 3: Guidelines

Guidelines for formatting correspondence and reports are determined by the Navy Correspondence manual, Marine Corps and Base Orders and by local state or federal regulatory agencies. The supervisor normally provides only general guidelines to the incumbent, and the incumbent uses professional judgement to establish appropriate guidelines to meet unusual situations.

Factor 4: Complexity

The incumbent must be flexible when dealing with formatting requirements established by the Navy and local state and federal regulatory agencies. The incumbent types correspondence and reports to other military organizations, other federal, state and local agencies and private contractors, and subcontractors, and receives work from various sources and in various forms. The correspondence and reports must be accurate because of the regulatory requirements generating the correspondence and reports. Because of the possibility of emergency situations arising at any time, the incumbent must be able to work under pressure and change priority as needed. The incumbent must take and relay accurate information in a timely manner.

Factor 5: Scope and Effect

The incumbent performs secretarial tasks for the Forestry, Fish and Wildlife, and the Environmental Branches of NREAD. The incumbent has contact with civilian and military personnel aboard Camp Lejeune and with personnel from various state, federal and local governmental agencies and with contractors and subcontractors working aboard the Base. The incumbent has personal contact, oral

equipment dealing with graphic and alpha numeric
geographic information system; command of the rules of grammar;
spelling and diction; and the forms of various forms of Navy
correspondence. The incumbent should have a knowledge of technical
and scientific terminology related to natural resources and
environmental management.

Factor 2: Supervisory Controls

The incumbent is under the direct supervision of the
Administrative Foreman, GS-12, and performs secretarial tasks for
the Supervisory Ranger and Wildlife, and Environmental Branches,
including the Branch Heads and their professional and technical
staffs. The incumbent normally receives only general instructions
as to priority and deadlines. The incumbent uses personal
initiative and judgement to schedule work within established
priorities, procedures and procedures, and consults with the
supervisor only if assignments conflict otherwise.

Factor 3: Guidelines

Guidelines for formatting correspondence and reports are
described by the Navy Correspondence manual, Marine Corps and Base
Orders and by local state or federal regulatory agencies. The
supervisor normally provides only general guidelines to the
incumbent, and the incumbent uses professional judgement to
establish appropriate guidelines to meet unusual situations.

Factor 4: Complexity

The incumbent must be flexible when dealing with formatting
requirements established by the Navy and local state and federal
regulatory agencies. The incumbent types correspondence and
reports + other military organizations, other federal, state and
local agencies and private contractors, and subcontractors, and
receives work from various sources and in various forms.
Correspondence and reports must be accurate because of the
confidentiality requirements and reports and reports.
Because of the possibility of emergency situations arising at any
time, the incumbent must be able to work under pressure and change
priority as needed. The incumbent must take and relay accurate
information on a timely basis.

Factor 5: Scope and Effect

The purpose of the secretarial tasks for the Forestry,
Fish and Wildlife, and the Environmental Branches of MCRAO. The
incumbent has contact with military personnel and civilian
personnel and with personnel from various state, federal and
local governmental agencies and with contractors and subcontractors
working aboard the base. The incumbent has personal contact, oral

and written communications with the above personnel, under normal working conditions and in emergency situations.

Factor 6: Personal Contacts

Personal contacts will be with civilian and military personnel aboard the Base and with personnel from various state, federal and local agencies and with private contractors or subcontractors involved in all phases of forestry, fish and wildlife, and environmental management.

Factor 7: Purpose of Contacts

Personal contacts with Base personnel are to communicate needs, answer questions and in general, ensure accomplishment of the goals and objectives of the Forestry, Fish and Wildlife, and Environmental Branches of NREAD. Contacts with organizations outside the Base are to relay information needed to make emergency and routine management decisions, receive data necessary to determine compliance, and provide requested information.

Factor 8: Physical Demands

Work is generally sedentary with some walking, bending, light lifting, and driving of government vehicles.

Factor 9: Work Environment

Work is generally performed in the office with adequate lighting, ventilation and comfortable temperatures.

and written communications with the above personnel, under normal working conditions and in emergency situations.

Factor 6: Personal Contacts

Personal contacts will be with civilian and military personnel aboard the base and with personnel from various state, federal and local agencies and with private contractors or subcontractors involved in all phases of forestry, fish and wildlife, and environmental management.

Factor 7: Purpose of Contacts

Personal contacts with Base personnel are to communicate needs, answer questions and in general, ensure accomplishment of the goals and objectives of the Forestry, Fish and Wildlife, and Environmental Branches of NREAB. Contacts with organizations outside the Base are to relay information needed to make emergency and routine management decisions, receive data necessary to determine compliance, and provide requested information.

Factor 8: Physical Demands

Work is generally sedentary with some walking, bending, lifting, and driving of government vehicles.

Factor 9: Work Environment

Work is generally performed in the office with adequate lighting, ventilation and comfortable temperatures.

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

DEPARTMENT OF THE NAVY

Memorandum

6240
NREAD

DATE: 24 Nov 86

FROM: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune

TO: Base Maintenance Officer, Marine Corps Base, Camp Lejeune

SUBJ: ELECTROLYTE DRUM AT BLDG 1827

Encl: (1) Supvy Chemist memo 6241/1 NREAD(L) of 20 Nov 86

1. It is recommended the Utilities Branch proceed with neutralizing subject battery acid as addressed in enclosure (1).

Julian I Wooten

JULIAN I. WOOTEN

U.S. GOVERNMENT PRINTING OFFICE: 1985 — 505-012/18049

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

DEPARTMENT OF THE NAVY

Memorandum

6241/1
NREAD (L)

DATE: 20 Nov 86

FROM: Supervisory Chemist, Water Quality Control Laboratory, Environmental Branch, Natural Resources and Environmental Affairs Division

TO: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune

Via: Supervisory Ecologist, Environmental Branch, Natural Resources and Environmental Affairs Division

SUBJ: ELECTROLYTE DRUM AT BLDG 1827

1. On 20 November 1986, Manual Martin and I met Cpl Micheals at Bldg 1827 to look at the electrolyte drum in question. Across approximately half the surface of the liquid in the drum was a rubbery scum. The scum is no more than one-half inch thick and appears relatively inert. Under scum, the liquid is crystal clear with a slight tint of green.

2. Cpl Micheals, of 2nd Supply Bn, 2dFSSG, stated that he knew there was battery acid, approximately 2-3 gallons of anti-freeze and possibly rain water in the drum.

3. The liquid has a pH of 1.5, confirming the presence of acid. I recommend the liquid be treated as battery acid and be neutralized by Utilities and then poured into an oil and water separator. What portion of the scum comes loose during the neutralizing will stay in the oil portion of the oil and water separator. I also recommend the empty drum be turned in to DRMO.

Elizabeth A. Betz

ELIZABETH A. BETZ

Copy to:
Supvy Ecologist

U.S. GOVERNMENT PRINTING OFFICE: 1985 — 505-012/18049

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 12/4/86

TO:

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

ATTN: Mr Sharpe

1. Attached is forwarded for info/action.

per Jones

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

3. Your file copy.

B L Ellis
by dir

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

MCBCL 5216/21 (REV. 04-85)

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

5 Dec 86
Date

From: Director
To: BMO Attn: Utilities Director
Subj: Proposed Guidance on Battery/Electrolyte Disposal

The attached message is provided for your review & concurrence.

2. Please Note that Mr Elston has reviewed the draft and made the pen changes there on.

D. Sharpe

UNCLASSIFIED

01 04 RR UUUU

FROM: CG MCB CAMP LEJEUNE NC

TO: CG SECOND MARDIV

CG SIXTH MAB

CG II MAF

NAVHOSP CAMP LEJEUNE NC

NAVDENCLINIC CAMP LEJEUNE NC

INFO MCAS NEW RIVER NC

UNCLAS //NO6280//

SUBJ: DISPOSAL OF USED BATTERIES AND RELATED ELECTROLYTE

A. BO 6240.5

1. THE PURPOSE OF THIS MSG IS TO PROVIDE REVISED ~~SOP~~ GUIDANCE FOR DISPOSAL OF USED BATTERIES and/or ~~ALL SITES WHERE USED~~ ELECTROLYTE, ~~IS GENERATED~~. EFFECTIVE IMMEDIATELY THE FOLLOWING ACTION WILL BE TAKEN TO ENSURE COMPLIANCE WITH STATE AND FEDERAL HW REGULATIONS. ~~THE BASIC CONCEPT OUTLINED HEREIN IS CONSISTENT WITH MIP #85-CLNC-414 LOG, PREVIOUSLY APPROVED~~.

A. USED ELECTROLYTE DRAINED FROM BATTERIES SHALL BE MANAGED AS ~~A~~ HW IAW THE REF. THE ELECTROLYTE SHALL BE DISPOSED OF IAW THIS MSG WITHIN 90 DAYS OF THE DATE DRAINED FROM BATTERY.

B. DRAINAGE OF INTACT, NONLEAKING BATTERIES IS PROHIBITED WITHOUT THE SPECIFIC WRITTEN APPROVAL OF THE COGNIZANT HAZARDOUS MATERIAL DISPOSAL COORDINATOR (HMDC). LOCATIONS WHERE BATTERIES ARE DRAINED ARE HAZARDOUS WASTE GENERATION SITES. LOCATIONS WHERE USED ELECTROLYTE DRAINED FROM BATTERIES IS STORED ARE HW ACCUMULATION AREAS. HW GENERATION SITES ARE SUBJECT TO PERSONNEL TRAINING REQUIREMENTS OF THE REFERENCE. ACCUMULATION AREAS ARE SUBJECT TO REFERENCE. LOCATIONS WHERE USED, UNDRAINED BATTERIES ARE COLLECTED

FOR SUBSEQUENT DISPOSAL THROUGH THE DEFENSE REUTILIZATION AND MARKETING OFFICER (DRMO) ARE GENERALLY NOT REGULATED BY THE REFERENCE UNLESS OTHER TYPES OF HM ARE INVOLVED.

C. BATTERIES SHALL BE STORED UPRIGHT AT ALL TIMES.

D. FACILITIES WHERE BATTERIES ARE DRAINED AND WHERE CONTAINERS OF USED ELECTROLYTE ARE STORED ARE REQUIRED TO HAVE HW SPILL CONTINGENCY PLANS POSTED.

2. BATTERY DISPOSAL PROCEDURES:

A. CAREFULLY INSPECT ALL BATTERIES REQUIRING DISPOSAL AND SEGREGATE INTO "LEAKING" AND "NONLEAKING" LOTS.

B. NONLEAKING BATTERIES SHALL BE STACKED ONE LAYER HIGH ON PALLETS. WHEN PALLET IS FULL, THE BATTERIES WILL BE COVERED WITH A SHEET OF 3/4" PLYWOOD THE SIZE OF THE PALLET. PLYWOOD AND BATTERIES SHALL BE SECURED TO PALLETS WITH BANDING MATERIAL.

C. FULL PALLETS OF BATTERIES WILL BE TURNED INTO THE DRMO PER THE REF AS A HAZARDOUS MATERIAL (HM). REFER ANY QUESTIONS REGARDING THESE PROCEDURES TO THE COGNIZANT HAZARDOUS MATERIAL DISPOSAL OFFICER (HMDO).

D. LEAKING BATTERIES WILL BE IMMEDIATELY DRAINED INTO DEPARTMENT OF TRANSPORTATION APPROVED CONTAINERS. DRAINED BATTERIES WILL BE STORED UPRIGHT, ONE LAYER HIGH ON PALLETS, ~~IN GOOD CONDITION~~. BATTERIES WILL BE COVERED WITH A SHEET OF PLYWOOD TO PREVENT ACCUMULATION OF RAIN WATER. BATTERIES WILL BE INSPECTED WEEKLY TO ENSURE PROPER STORAGE. WHEN PALLET IS FULL, BIND PLYWOOD AND BATTERIES TO PALLET SECURELY WITH BANDING MATERIAL AND TURN IN TO DRMO AS A HM PER THE REFERENCE.

E. KEEP ELECTROLYTE STORAGE CONTAINERS TIGHTLY SEALED AT ALL TIMES WHEN DRAINING BATTERIES NOT IN PROGRESS. PLACE A PROPERLY

COMPLETED HW LABEL ON THE CONTAINER IAW THE REF PRIOR TO COMMENCING FILLING. ENSURE THAT "CORROSIVE" LABELS ARE USED TO WARN OF HAZARD TO PERSONNEL SAFETY.

F. BE SURE THAT ACCUMULATION START DATE IS CLEARLY SHOWN ON EACH HW LABEL. NOTIFY COGNIZANT HMDO WEEKLY OF THE NUMBER OF CONTAINERS OF ELECTROLYTE ON HAND WHICH ARE FULL OR WHICH HAVE ACCUMULATION START DATES WHICH ARE 45 DAYS OLD OR OLDER.

G. INSPECT CONTAINERS ON A WEEKLY BASIS IAW THE REF. MAINTAIN A WRITTEN LOG WHICH PROVIDES DATE OF INSPECTION, THE PERSON CONDUCTING INSPECTION, PROBLEMS FOUND AND CORRECTIVE ACTION TAKEN. HMDO'S WILL FURNISH PROPER FORMS FOR MAINTAINING LOG.

H. BATTERY DISPOSAL ACTIVITIES AND RELATED INSPECTIONS WILL BE PERFORMED BY OR UNDER DIRECT SUPERVISION OF HW HANDLERS HAVING PROPERLY DOCUMENTED HW TRAINING IAW WITH THE REF. HMDO'S WILL MONITOR ADEQUACY OF HW TRAINING AND DOCUMENTATION CONTINUOUSLY.

I. HW SPILL CONTINGENCY PLANS WILL BE CONSPICUOUSLY POSTED AT EACH LOCATION USED FOR THE DRAINAGE OF USED BATTERIES OR FOR THE STORAGE OF USED ELECTROLYTE. HMDO'S WILL FURNISH GUIDANCE. PERSONNEL WILL BE EQUIPPED AND TRAINED TO RESPOND TO SPILLS OF ELECTROLYTE SAFELY.

3. THE ~~BMO~~ BASE MAINTENANCE OFFICER (BMO) AND COGNIZANT HMDO SHALL COORDINATE THE DISPOSAL OF ELECTROLYTE COLLECTED PER PARAGRAPH 5 ABOVE. BMO SHALL ENSURE THAT ONE OF THE FOLLOWING PROCEDURES IS IMPLEMENTED AT A FREQUENCY NOT LESS THAN ONCE EACH 60 DAYS:

A. ONSITE NEUTRALIZATION AND DISCHARGE TO THE SANITARY SEWER BY BMO OR

B. PICKUP OF CONTAINERS BY TMO FOR TRANSPORT TO CENTRAL BMO OPERATED NEUTRALIZATION AND DISPOSAL FACILITY.

J. TRANSPORTATION OF USED BATTERIES CONTAINING ELECTROLYTE IS NOT REGULATED BY THE REFERENCE.

4. ADDRESSES ARE REQUESTED TO TAKE IMMEDIATE ACTION TO LIMIT THE NUMBER OF LOCATIONS WITHIN THEIR COMMANDS WHERE BATTERIES ARE DRAINED AND ELECTROLYTE IS ACCUMULATED. ~~TRANSPORTATION OF USED BATTERIES CONTAINING ELECTROLYTE IS NOT REGULATED BY THE REFERENCE.~~ THIS COMMAND WILL PLACE HIGH PRIORITY ON PROGRAMMING AND BUDGETING FOR FACILITIES AND EQUIPMENT to equip facilities where batteries are drained and electrolyte accumulated. FOR SECOND MARDIV; SECOND FSSG; AND MCAS, NEW RIVER: REQUEST YOU PROVIDE A PROPOSED SITE AND DESCRIPTION OF NEEDED FACILITIES IMPROVEMENTS AND EQUIPMENT TO THE CG, MCB (ATTN: AC/S, FACILITIES) BY 1 JAN 87. FOR BMO: REQUEST YOU IDENTIFY A CENTRAL LOCATION FOR USE BY MCB AND OTHER COMMANDS NOT ADDRESSED ABOVE ~~PROVIDE A PROPOSED SITE~~ AND A DESCRIPTION OF NEEDED FACILITIES IMPROVEMENTS AND EQUIPMENT TO CG, MCB (ATTN: AC/S FACILITIES) BY 1 JAN 87. TECHNICAL ASSISTANCE WITH THIS MATTER IS AVAILABLE FROM THE BASE SAFETY OFFICER; DIRECTOR, NREAD; BASE FIRE CHIEF, AND THE PUBLIC WORKS OFFICER.

5. QUESTIONS REGARDING IMPLEMENTATION OF THIS MSG SHOULD BE REFERRED TO THE COGNIZANT HMDO FOR RESOLUTION. UNRESOLVED QUESTIONS AND ISSUES SHOULD BE REFERRED VIA COGNIZANT HDMC TO THE DIR, NREAD, EXTS 2083/2195. HMDC'S AND DIR, NREA, WILL COOPERATE IN RESOLUTION OF SIGNIFICANT ISSUES. POC IS MR. DANNY SHARPE, NREAD, EXT 2083.

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

1 Dec 86
Date

From: **Director**
To: AC/S Facilities

Subj: DISPOSAL OF WET CELL BATTERIES AND USED ELECTROLYTE

1. Please review the attached information and provide concurrence/comments.

V/R

Danny Shayne

RECEIVED
1 DEC 1986

UNCLASSIFIED

01 04 RR UUUU

FROM: CG MCB CAMP LEJEUNE NC

TO: CG SECOND MARDIV

CG SIXTH MAB

CG II MAF

NAVHOSP CAMP LEJEUNE NC

NAVDENCLINIC CAMP LEJEUNE NC

INFO MCAS NEW RIVER NC

UNCLAS //NO6280//

SUBJ: DISPOSAL OF USED BATTERIES AND RELATED ELECTROLYTE

A. BO 6240.5

1. THE PURPOSE OF THIS MSG IS TO PROVIDE REVISED SOP GUIDANCE FOR ALL SITES WHERE USED ELECTROLYTE IS GENERATED. EFFECTIVE IMMEDIATELY THE FOLLOWING ACTION WILL BE TAKEN TO ENSURE COMPLIANCE WITH STATE AND FEDERAL HW REGULATIONS. THE BASIC CONCEPT OUTLINED HEREIN IS CONSISTENT WITH MIP #85-CLNC-414 LOG, PREVIOUSLY APPROVED.

A. USED ELECTROLYTE DRAINED FROM BATTERIES SHALL BE MANAGED AS A HW IAW THE REF. THE ELECTROLYTE SHALL BE DISPOSED OF IAW THIS MSG WITHIN 90 DAYS OF THE DATE DRAINED FROM BATTERY.

B. DRAINAGE OF INTACT, NONLEAKING BATTERIES IS PROHIBITED WITHOUT THE SPECIFIC WRITTEN APPROVAL OF THE COGNIZANT HAZARDOUS MATERIAL DISPOSAL COORDINATOR (HMDC). LOCATIONS WHERE BATTERIES ARE DRAINED ARE HAZARDOUS WASTE GENERATION SITES. LOCATIONS WHERE USED ELECTROLYTE DRAINED FROM BATTERIES IS STORED ARE HW ACCUMULATION AREAS. HW GENERATION SITES ARE SUBJECT TO PERSONNEL TRAINING REQUIREMENTS OF THE REFERENCE. ACCUMULATION AREAS ARE SUBJECT TO REFERENCE. LOCATIONS WHERE USED, UNDRAINED BATTERIES ARE COLLECTED

FOR SUBSEQUENT DISPOSAL THROUGH THE DEFENSE REUTILIZATION AND MARKETING OFFICER (DRMO) ARE GENERALLY NOT REGULATED BY THE REFERENCE UNLESS OTHER TYPES OF HM ARE INVOLVED.

C. BATTERIES SHALL BE STORED UPRIGHT AT ALL TIMES.

D. FACILITIES WHERE BATTERIES ARE DRAINED AND WHERE CONTAINERS OF USED ELECTROLYTE ARE STORED ARE REQUIRED TO HAVE HW SPILL CONTINGENCY PLANS POSTED.

2. BATTERY DISPOSAL PROCEDURES:

A. CAREFULLY INSPECT ALL BATTERIES REQUIRING DISPOSAL AND SEGREGATE INTO "LEAKING" AND "NONLEAKING" LOTS.

B. NONLEAKING BATTERIES SHALL BE STACKED ONE LAYER HIGH ON PALLETS. WHEN PALLET IS FULL, THE BATTERIES WILL BE COVERED WITH A SHEET OF 3/4" PLYWOOD THE SIZE OF THE PALLET. PLYWOOD AND BATTERIES SHALL BE SECURED TO PALLETS WITH BANDING MATERIAL.

C. FULL PALLETS OF BATTERIES WILL BE TURNED INTO THE DRMO PER THE REF AS A HAZARDOUS MATERIAL (HM). REFER ANY QUESTIONS REGARDING THESE PROCEDURES TO THE COGNIZANT HAZARDOUS MATERIAL DISPOSAL OFFICER (HMDO).

D. LEAKING BATTERIES WILL BE IMMEDIATELY DRAINED INTO DEPARTMENT OF TRANSPORTATION APPROVED CONTAINERS. DRAINED BATTERIES WILL BE STORED UPRIGHT, ONE LAYER HIGH ON PALLETS IN GOOD CONDITION. BATTERIES WILL BE COVERED WITH A SHEET OF PLYWOOD TO PREVENT ACCUMULATION OF RAIN WATER. BATTERIES WILL BE INSPECTED WEEKLY TO ENSURE PROPER STORAGE. WHEN PALLET IS FULL, BIND PLYWOOD AND BATTERIES TO PALLET SECURELY WITH BANDING MATERIAL AND TURN IN TO DRMO AS A HM PER THE REFERENCE.

E. KEEP ELECTROLYTE STORAGE CONTAINERS TIGHTLY SEALED AT ALL TIMES WHEN DRAINING BATTERIES NOT IN PROGRESS. PLACE A PROPERLY

COMPLETED HW LABEL ON THE CONTAINER IAW THE REF PRIOR TO COMMENCING FILLING. ENSURE THAT "CORROSIVE" LABELS ARE USED TO WARN OF HAZARD TO PERSONNEL SAFETY.

F. BE SURE THAT ACCUMULATION START DATE IS CLEARLY SHOWN ON EACH HW LABEL. NOTIFY COGNIZANT HMDO WEEKLY OF THE NUMBER OF CONTAINERS OF ELECTROLYTE ON HAND WHICH ARE FULL OR WHICH HAVE ACCUMULATION START DATES WHICH ARE 45 DAYS OLD OR OLDER.

G. INSPECT CONTAINERS ON A WEEKLY BASIS IAW THE REF. MAINTAIN A WRITTEN LOG WHICH PROVIDES DATE OF INSPECTION, THE PERSON CONDUCTING INSPECTION, PROBLEMS FOUND AND CORRECTIVE ACTION TAKEN. HMDO'S WILL FURNISH PROPER FORMS FOR MAINTAINING LOG.

H. BATTERY DISPOSAL ACTIVITIES AND RELATED INSPECTIONS WILL BE PERFORMED BY OR UNDER DIRECT SUPERVISION OF HW HANDLERS HAVING PROPERLY DOCUMENTED HW TRAINING IAW WITH THE REF. HMDO'S WILL MONITOR ADEQUACY OF HW TRAINING AND DOCUMENTATION CONTINUOUSLY.

I. HW SPILL CONTINGENCY PLANS WILL BE CONSPICUOUSLY POSTED AT EACH LOCATION USED FOR THE DRAINAGE OF USED BATTERIES OR FOR THE STORAGE OF USED ELECTROLYTE. HMDO'S WILL FURNISH GUIDANCE. PERSONNEL WILL BE EQUIPPED AND TRAINED TO RESPOND TO SPILLS OF ELECTROLYTE SAFELY.

3. THE BMO AND COGNIZANT HMDO SHALL COORDINATE THE DISPOSAL OF ELECTROLYTE COLLECTED PER PARAGRAPH 5 ABOVE. BMO SHALL ENSURE THAT ONE OF THE FOLLOWING PROCEDURES IS IMPLEMENTED AT A FREQUENCY NOT LESS THAN ONCE EACH 60 DAYS:

A. ONSITE NEUTRALIZATION AND DISCHARGE TO THE SANITARY SEWER BY BMO OR

B. PICKUP OF CONTAINERS BY TMO FOR TRANSPORT TO CENTRAL BMO OPERATED NEUTRALIZATION AND DISPOSAL FACILITY.

4. ADDRESSEES ARE REQUESTED TO TAKE IMMEDIATE ACTION TO LIMIT THE NUMBER OF LOCATIONS WITHIN THEIR COMMANDS WHERE BATTERIES ARE DRAINED AND ELECTROLYTE IS ACCUMULATED. BECAUSE TRANSPORTATION OF USED BATTERIES CONTAINING ELECTROLYTE IS NOT REGULATED BY THE REFERENCE, IT IS POSSIBLE THAT EACH MAJOR COMMAND COULD DESIGNATE AS FEW AS ONE LOCATION. AS AN INCENTIVE, THIS COMMAND WILL PLACE HIGH PRIORITY ON PROGRAMMING AND BUDGETING OF FACILITIES AND EQUIPMENT REQUIRED AT ONE LOCATION EACH WITHIN THE SECOND MARDIV, SECOND FSSG AND MCAS, NEW RIVER. BMO IS REQUESTED TO ESTABLISH A CENTRAL LOCATION FOR USE BY MCB AND MCB TENANTS NOT ADDRESSED ABOVE. SECOND MARDIV; SECOND FSSG; MCAS, NEW RIVER, AND BASE MAINTENANCE OFFICER ARE REQUESTED TO PROVIDE A PROPOSED SITE AND DESCRIPTION OF NEEDED FACILITIES IMPROVEMENTS AND EQUIPMENT TO THE CGMCB, ATT: AC/S, FACILITIES BY 1 JAN 87. TECHNICAL ASSISTANCE WITH THIS MATTER IS AVAILABLE FROM THE BASE SAFETY OFFICER; DIRECTOR, NREAD; BASE FIRE CHIEF AND THE PUBLIC WORKS OFFICER.

5. QUESTIONS REGARDING IMPLEMENTATION OF THIS MSG SHOULD BE REFERRED TO THE COGNIZANT HMDO FOR RESOLUTION. UNRESOLVED QUESTIONS AND ISSUES SHOULD BE REFERRED VIA COGNIZANT HMDC TO THE DIR, NREA, EXTS 2083/2195. HMDC'S AND DIR, NREA, WILL COOPERATE IN RESOLUTION OF SIGNIFICANT ISSUES. POC IS MR. DANNY SHARPE, NREA, EXT. 2083.

6280
MAIN

SEP 12 1986

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commandant of the Marine Corps (LFL)

Subj: PCB EQUIPMENT REMOVAL

Ref: CMC ltr 6280 LFL of 25 Jul 86

Encl: (1) Camp Lejeune and MCAS Transformers that contain PCB

1. The reference provided guidance for the assignment of mission sensitivity for known Polychlorinated Biphenyl (PCB) contaminated transformers utilizing the PCB Item Fire Risk Assessment Prioritization Model.

2. In accordance with the reference, the enclosure is hereby submitted.

T. J. DALZEL
By direction

Blind copy to:
Env Engr
NREAD
OpnsBr (BMain)

CAMP LEJEUNE & MCAS TRANFORMERS THAT CONTAIN PCB

LOCATION	TYPE OIL	SERIAL #	RISK ASSESSMENT SCORE	PHASE	KVA	GALLONS	ESTIMATED REPLACEMENT COST
671	Pyranol	G-854895	117	3	1000	205	15,000
825 (CL Sch)	Askarel	110065	116	3	300	202	25,000
H-1 (Bay 17)	Inerteen	3161514	85	3	300	266	25,000
H-1 (Bay 20)	Inerteen	3161515	143	3	300	266	25,000
H-15	Inerteen	3161516	REMOVED	3	300	266	REMOVED 1986
HP-2	Askarel	RFK0874	93	3	225	250	6,000
HP 460	Pyranol	G854205	128	3	225	100	10,000
HP 56	Inerteen	7PMC92476	36	3	300	135	7,000
HP 56	Inerteen	5PMC92476	56	3	225	96	7,000
HP 55	Inerteen	4PMC92476	56	3	225	96	7,000
HP 53	Inerteen	3PMC92476	42	3	225	96	7,000
HP 53	Inerteen	8PMC92476	36	3	300	135	7,000
HP 53	Inerteen	2PMC92476	56	3	225	96	7,000
HP 901	Inerteen	PXC8872	88	3	225	100	7,000
HP 901	Pyranol	8036879	88	3	100	98	6,000
HP 901	Pyranol	8036880	88	3	100	98	6,000
HP 900	Pyranol	8036878	78	3	100	98	6,000
HP 1141	Inerteen	6PMC92476	36	3	225	96	6,500
HP 1141	Inerteen	1PMC92476	56	3	225	96	7,000
HP 1771	Pyranol	4361613P71	43	3	112.5	115	5,000
FC 200	Askarel	76641	35	3	225	173	7,000
FC100	Askarel	76640	53	3	300	230	6,000
FC411	Inerteen	2PXC49674	66	3	300	100	7,000
FC420	Inerteen	TAV2471-01	115	3	750	320	10,000
FC414	Inerteen	PXC49674	66	3	300	100	7,000
FC412	Inerteen	3PXC49674	66	3	300	100	7,000
FC400	Inerteen	5PXC49674	53	3	300	100	7,500
TC480	Pyranol	H376026P73A	56	3	150	125	6,000
MCAS 4141	Inerteen	TAV8685	38	3	750	286	15,000
MCAS 4100	Pyranol	H886978	66	3	750	140	15,000
MCAS 4106	Pyranol	F964669	38	3	1500	205	20,000
MCAS 4108	Pyranol	F964679	37	3	1500	205	20,000
MCAS 4020	Inerteen	PCV0741-01	66	3	500	160	10,000
MCAS 4012	Pyranol	H223581-68P	REMOVED	3	225	94	REMOVED 1985
MCAS 4025	Pyranol	H-887992	66	3	500	119	10,000
MCAS 4010	Pyranol	F964601	56	3	750	180	15,000
H-1 (Bay 21)	Inerteen	3160915	95	1	100	43	2,000
H-1 (Bay 21)	Inerteen	3380120	95	1	100	80	2,000
H-1 (out adm)	Inerteen	CV080401	56	3	750	215	15,000
H-1 (out adm)	Askarel	44636	66	3	112.5	74	7,000
MCAS 3619	Askarel	5639274	17	1	15	20	800
MCAS 3620	Askarel	5639275	34	3	112.5	102	5,000
MCAS 3504	Askarel	5538054	53	3	75	106	4,000
MCAS 3502	Askarel	5538055	53	3	300	180	6,000
MCAS 901	Askarel	74V5680	56	3	500	258	7,000
MCAS 705	Askarel	37584	81	3	500	277	7,000
MCAS 312	Pyranol	F63707366P	43	3	225	116	6,500
MCAS 320	Inerteen	TAT 1046-01	56	3	750	246	15,000
MCAS 205	Askarel	6740378	56	3	225	175	7,000
MCAS 4121	Pyranol	H223491-68P	46	3	150	53	6,000
BB-52	Inerteen	61J15395	66	1	167	60	2,000
BB-52	Inerteen	61J15396	66	1	167	60	2,000
BB-52	Inerteen	61J15397	66	1	167	60	2,000

Encl (2)

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

DEPARTMENT OF THE NAVY

Memorandum

6240
NREAD

DATE: 12 Sep 1986

FROM: Danny Sharpe, Supervisory Ecologist

TO: MEMO FOR THE RECORD

SUBJ: EPA LTR DATED 14 AUGUST 1986

1. Be advised that the Supervisory Ecologist upon recommendation of the Assistant Chief of Staff, Facilities, reviewed the HW Inspection Report contained in the subject letter with Mr. Paul Hubbell, HQMC, during a phonecon on or about 5 Sep 1986. I advised Mr. Hubbell of the substance of the violations and the nature of the corrective action Base Officials were going to propose during a planned meeting with State Regulatory personnel on 8 Sep 1986. Mr. Hubbell concurred in the planned approach for dealing with the State HW Regulatory Agency.

2. Also be advised that a copy of the subject letter was informally forwarded to Mr. Hubbell by Director, NREAD, pursuant to AC/S, Facilities concurrence.

DANNY D. SHARPE

Copy to:
SJA

☆ U.S. GOVERNMENT PRINTING OFFICE: 1983-605-010:8460

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

DEPARTMENT OF THE NAVY

Memorandum

12000
NREAD

DATE: 3 Sep 1986

FROM: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune

TO: Supervisory Chemist

Via: Supervisory Ecologist

SUBJ: IDENTIFICATION OF HAZARDOUS WASTE

Encl: (1) Head, Solid & Hazardous Waste Mgt Br memo dtd 29 Jul 86

1. The enclosure provides specific requirements for the identification of the hazardous waste characteristics of spill residues and sludges prior to disposal at the Base Sanitary Landfill. Significant technical/laboratory support will be required to implement these requirements.

2. Accordingly, responsibility for providing NREAD support required to implement requirements outlined in the enclosure is assigned to the Water Quality Control Laboratory. The Supervisory Chemist shall receive and process requests for assistance from NREAD. All recommendations developed by the Supervisory Chemist will be in writing in draft form for signature by Director, NREAD.

3. Please review the enclosure immediately and advise of any problems in implementation. Please prepare a transmittal letter to the Base Maintenance Officer setting up procedures for requesting NREAD support.

J. I. WOOTEN

Copy to:
CPD, Personnel File

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

James G. Martin, Governor
Phillip J. Kirk, Jr., Secretary

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

July 29, 1986

MEMORANDUM

TO: Sanitary Landfill Operators

FROM: William L. Meyer, Head WLM
Solid & Hazardous Waste Management Branch

SUBJECT: Disposal of Oil Spill Residue

The Branch has formulated guidance (copy attached) which will give instructions for determination of oily wastes which may be disposed in sanitary landfills. As you will note, virgin oil and gasoline residue will not need special approval from this office so long as the total amount does not exceed 50 cubic yards or 100 gallons. The person or firm having this pre-approved residue for disposal will contact you directly to arrange for disposal. (The landfill owner/operator may elect not to accept spill residues).

The following conditions must be adhered to by each landfill when this type waste is accepted:

1. Under no circumstances will oily waste be disposed of by mixing with routine waste or burned below ground in a separate area without specific DHS spproval.

2. Waste shall be land applied to an area of the landfill which has received two feet of earthen cover or a virgin area.

3. The waste shall be applied in a thin layer not to exceed six inches in depth.

4. Surface water shall be diverted from the area of application.

5. The area shall be seeded to control erosion.

If you have any questions, do not hesitate to contact the Raleigh Office at (919) 733-2178 or your regional Waste Management Specialist.

WLM/TFD/nlp

Attachment

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

James G. Martin, Governor
Phillip J. Kirk, Jr., Secretary

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

July 16, 1986

Re: Disposal of Solid Residue from Petroleum Discharge Clean-Ups

The following Guidance must be followed to allow the Solid and Hazardous Waste Management Branch to ensure proper disposition of petroleum spill residue.

Please contact this office at (919) 733-2178 if further assistance is needed in evaluating disposal options.

Disposition of Solid Residue from Petroleum Discharge Clean-ups

Prior to disposal and based upon the following analytical criteria, and accompanying Waste Determination Form, the Solid and Hazardous Waste Management Branch shall determine the acceptability of discharge residues by sanitary landfills.

1. Discharges of gasoline and of fuel oil (e.g., kerosene, No. 2) which is not blended from used oil will be assumed to have no metals in excess of allowable limits for landfilling and will be assumed to have a flash point greater than 140°F. This material will; therefore, need no analysis prior to landfilling unless State agent coordinating response has reason to believe otherwise.

Discharges of less than than 100 gallons, or residue of less than 50 cubic yards need not be reported to the Solid and Hazardous Waste Management Branch prior to acceptance by a landfill. However this material is still subject to discretionary acceptance by the landfill operator prior to transportation.

2. Discharges of used oil or fuel oil blended from used oil (both motor oil and industrial oil) will be assumed to be in excess of all limits for hazardous waste until laboratory analysis indicates otherwise. Analysis should be for all parameters in table for landfill limits.

3. Discharges associated with storage tanks or residue from areas subjected to mutiple discharges will be assumed to be unacceptible for landfilling until laboratory analysis indicates otherwise. Analysis should be for all parameters in table for landfill limits and/or for specific constituents of material previously and/or currently associated with contributing to the discharge(s).

Used oil may in the very near future be listed Hazardous Waste (No. F030). At that time, discharges of used oil must be handled as hazardous waste discharges and solid as well as liquid residue from clean-up will be banned from sanitary landfills. This exclusion does not apply to discharges of virgin petroleum products (No. 1 above).

The following materials are banned from sanitary landfill disposal:

1. Liquids

2. Discharges of hazardous waste

3. Spills of materials which when spilled become hazardous waste (40 CFR 231.33).

4. Discharge residue with constituents in excess of that indicated in table below:

The following table contains limits for constituents which discharge residue must not exceed in order to be acceptible for landfill disposal. Determination for metals must follow the attached Extraction Procedure modification to the extraction procedure contained in 40 CFR 261.

Landfill Limits

Arsenic	0.5 ppm
Cadmium	0.1 ppm
Chromium	0.5 ppm
Lead	0.5 ppm
Mercury	0.02ppm
Total Halogenated Solvents	1.0 ppm

As an indicator of the amount of contaimination in soil, a liquid portion of the discharge, if available, may be analyzed for total metal in lieu of the Extraction Procedure. Soils analyzed for total metals will indicate erroneous levels of contamination, therefore all discharge residue (not liquid) analysis for metals must follow the attached Extraction Procedure.

Whenever possible, analysis should be performed prior to excavation and removal operations.

For items No. 2 and 3 above, prior to transportation to a sanitary landfill, analytical data concerning discharge residue, must be provided to the N.C. Solid and Hazardous Waste Management Branch for evaluation. Requests for landfill disposal must be accompanied by a properly completed "Waste Determination Form."

For item no. 1 in quantities of greater than 100 gallons discharged or of 50 cubic yards of residue and for items nos. 2 and 3, approval must be obtained from the Solid and Hazardous Waste Management Branch for acceptance by a landfill prior to transportation. Final approval must be secured from the landfill controlling authority for item #1 and other residues approved by the Solid and Hazardous Waste Management Branch prior to transportation to the landfill.

Discharges of new and used oil (at present) may be recovered for re-use by a used oil handler and will not be classified as hazardous waste provided total halogen does not exceed 1000 ppm.

After emergency response activities are completed, discharge of hazardous waste may only be transported by a transporter with an EPA ID number destined for proper TSD with an EPA ID number.

STATE OF NORTH CAROLINA

DEPARTMENT OF HUMAN RESOURCES
Division of Health Services
ENVIRONMENTAL HEALTH SECTION
Solid & Hazardous Waste Management Branch

PROCEDURE AND CRITERIA FOR WASTE DETERMINATION

This procedure will be used by the Division of Health Services to determine whether a waste is (1) hazardous as defined by 10 NCAC 10F, and (2) suitable for disposal at a solid waste management facility.

The types of wastes that will be evaluated by this procedure are primarily, but not exclusively, industrial and commercial wastes and sludges, and Publicly Owned Treatment Works sludges.

The Division of Health Services reserves the right to request additional information or waive some of the requirements based on the type of waste if it deems necessary. The Division may also require some wastes to be treated or altered to render the waste environmentally immobile prior to disposal at a sanitary landfill. Wastes disposed at sanitary landfills must be non-liquid and in a form that can be confined, compacted, and covered in accordance with the "Solid Waste Management Rules". APPROVAL TO DISPOSE OF THE WASTE SHALL ALSO BE OBTAINED FROM THE OWNER OR OPERATOR OF THE LANDFILL PRIOR TO DISPOSAL.

The following information is required for an evaluation. An asterisk (*) denotes information required for Publicly Owned Treatment Works.

* GENERAL INFORMATION

1. Name and address of facility or person generating waste _____
_____
_____

2. What is the waste? _____
_____

3. What volume of disposal will there be? _____

4. What frequency of disposal will there be? _____

5. Explain either the manufacturing process or how the waste was generated. _____
_____
_____
_____
_____
_____
_____
_____
_____

(more)

INFORMATION FOR HAZARDOUS (RCRA) DETERMINATION (10 NCAC 10F .0029)

1. Is the waste listed under .0029(e) (i.e., 40 CFR 261.31 - 261.33)? If yes, list number._____.

2. Does the waste exhibit any of the four characteristics as defined by .0029(d) (i.e., 40 CFR 261.21 - 261.24)? (Attach lab results)
* (EP Toxicity for metals and pH). _____

INFORMATION FOR LANDFILLING DETERMINATION

1. Does the waste contain any hazardous waste constituents listed in .0029(e), Appendix VIII (i.e., 40 CFR 261, Appendix VIII)? If yes, what constituents and what concentration? (Attach lab results.)

_____

_____

2. What other constituents are present and in what concentration? (Attach lab results.)_____

_____

* 3. What is the moisture content? _____

* 4. Which solid waste management facility is the request for?

_____

* 5. Specify how the waste will be delivered - in bulk or containers (i.e., barrels, bags, etc.)? _____

"I hereby certify that the information submitted in regard to _____ (name of waste) is true and correct to the best of my knowledge and belief."

_____
(signature)

All questions concerning this "Procedure" should be directed to Gordon Layton or Jerry Rhodes at (919) 733-2178. Answer specific questions in space provided. Attach additional sheets if necessary.

Complete all information, sign and submit to:

Division of Health Services
Solid & Hazardous Waste Management Branch
P. O. Box 2091
Raleigh, NC 27602

Attn: Waste Determination

DRAFT

EP FOR OILY WASTE BEING LANDFILLED

1. Separate the sample (minimum 100 gm) into its solid and liquid components. The liquid component is defined as that portion of the sample which passes through a 0.45 um filter media under a pressure differential of 75 psi.

2. Determine the quantity of liquid (ml) and the concentration of the toxicants of concern in the liquid phase (mg/l).

3. Place the solid phase into a Soxnlet extractor, charge the concentration flask with tetrahydrofuran and extract for 3 hours.

4. Remove the flask containing tetrahydofuran and replace it with one containing toluene.

5. Extract the solid for a second time, for 3 hours, with the toluene.

6. Combine the tetrahydrofuran and toluene extracts.

7. Analyze the combined extracts for the toxicants of concern.

8. Determine the quantity of liquid (ml) and the concentration of the toxicants of concern in the combined extracts (mg/l).

9. Take the solid material remaining in the Soxnlet thimble and dry it at 100°C for 30 minutes.

10. Run the EP on the dried solid.

11. Calculate the mobile metal concentration (MMC) using the following formula.

$$MMC = 1000\ ([Q_1 + Q_2 + Q_3]/[L_1 + (L_2)]$$

Q_1 = Amount of toxicant in initial liquid phase of sample (Amt. of liquid X Conc. of Toxicant) (mg)

Q_2 = Amount of toxicant in combined organic extracts of sample (Amt. of Liquid X Conc. of Toxicant) (mg)

Q_3 = Amount of toxicant in EP extract of solid (Amt. of extract X Con. of Toxicant) (mg)

L_1 = Amount of Initial Liquid (ml)

L_2 = Amount of liquid in EP = weight of dried solid from step 9 x 20 (ml)

Note: This procedure is currently suggested by EPA and is subject to change.

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

6280/10
FAC
14 MAY 1986

Mr. R. Paul Wilms, Director
N.C. Division of Environmental Management
Attn: Groundwater Section
P.O. Box 27687
Raleigh, NC 27611-7687

Re: Notification of Underground Tanks
Camp Lejeune, NC

Dear Mr. Wilms:

We are forwarding the notifications for existing tanks as required by recent regulations. The tanks are listed by building number on the enclosed forms and organized as follows:

pp 1 - 6: Base Logistics Dept., Shop Stores Branch
pp 7 - 14: Marine Corps Exchange Service Stations
pp 14 - 18: Marine Corps Air Station, New River
pp 19: Naval Hospital
pp 20 - 23: Miscellaneous tanks at tactical equipment shops

A basewide study of undergrounds tanks is being initiated this year to define potential problem areas and develop a tank testing program. The study is being developed by Headquarters, Marine Corps with assistance of the Atlantic Division of the Naval Facilities Engineering Command. Details on the scope of the study with milestones will be forwarded to your office as they become available.

For additional information on this matter, please contact Mr. Bob Alexander, MCB Environmental Engineer at 919-451-3034.

Sincerely,

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

Encl:
(1) Notification Form, 23 pages

Copy to:
CMC (LFL)
LANTDIV (Code 114)

Blind copy to:
CO, MCAS, NR (Pgs 14-18)
CO, NAVHOSP (Pg 19)
AC/S, Log (Pgs 1-6)
MCEXO (Pgs 7-14)
BMO (w/o Encl)
NREAD
PWO
EnvEngr

DLW Dan DDJ K

Permanent File

6280/2
FAC
JAN 30 1986

Mr. William Myer, Head
Solid and Hazardous Waste Management Branch
N. C. Division of Health Services
P. O. Box 2091
Raleigh, NC 27602-2091

Re: Notification of Hazardous Waste Activity for
Burning and Marketing Used Oil Fuel
NC 6170022580 - MCB Camp Lejeune
NC 6170022570 - MCAS, New River

Dear Mr. Myer:

We are enclosing the subject notifications as required by recently published regulations. Reports are completed for the generation and collection of used oils at Camp Lejeune and MCAS, New River.

Marketing for recycling or burning of the used oils is currently performed through the Camp Lejeune office of the Defense Reutilization and Marketing Office, Defense Logistics Agency. In mid-1986, a Base-wide management plan for both used oils and hazardous materials/waste will be completed. We will keep you informed of the plan's progress and seek your advice in implementing practices which conform to North Carolina policies.

Please contact Mr. Bob Alexander, Marine Corps Base Environmental Engineer, 919-451-3034, should you desire further information on this matter.

Sincerely,

R. A. TIEBOUT
Colonel, U. S. Marine Corps
Assistant Chief of Staff, Facilities
By direction of the Commanding General

Encl:
(1) Notification of Hazardous Waste Activity, NC 6170022580, MCB, Camp Lejeune
(2) Notification of Hazardous Waste Activity, NC 6170022570, MCAS, New River

Copy to:
USEPA, Region IV, Atlanta, Ga
CMC (LFL)
LANTDIV (Code 114)
CO, MCAS, NR (Grd Safety Mgr)
DRMO, Camp Lejeune

Blind copy to:
MAIN
NREAD
EnvEngr

JAN 30 1986

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).

For Official Use Only

Comments

C C

Installation's EPA ID Number — Approved — Date Received (yr. mo. day)

C F — T/A C 1

I. Name of Installation

U . S . M A R I N E C O R P S B A S E

II. Installation Mailing Address

Street or P.O. Box

C 3 F A C I L I T I E S D E P T

City or Town — State — ZIP Code

C 4 C A M P L E J E U N E — N C 2 8 5 4 0

III. Location of Installation

Street or Route Number

C 5 U . S . M A R I N E C O R P S B A S E

City or Town — State — ZIP Code

C 6 C A M P L E J E U N E — N C 2 8 5 4 2

IV. Installation Contact

Name and Title (last, first, and job title) — Phone Number (area code and number)

C 2 A L E X A N D E R , R E N V E N G — 9 1 9 4 5 1 3 0 3 4

V. Ownership

A. Name of Installation's Legal Owner — B. Type of Ownership (enter code)

C R B R I G G E N J . B . K N O T T S — F F

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

- [X] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo.
- [X] 2. Transporter
- [X] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel (enter 'X' and mark appropriate boxes below)
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [X] 6. Off-Specification Used Oil Fuel (enter 'X' and mark appropriate boxes below)
  - [X] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer (Or On-Site Burner) Who First Claims the Oil Meets the Specification.

VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

- [ ] A. Air
- [ ] B. Rail
- [X] C. Highway
- [ ] D. Water
- [ ] E. Other (specify)

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [ ] A. First Notification
- [ ] B. Subsequent Notification (complete item C)

C. Installation's EPA ID Number: N C 6 1 7 0 0 2 2 5 8 0

Continue on reverse

| ID — For Official Use Only | | |

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

Please print or type with ELITE type *(12 characters per inch)* in the unshaded areas only

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

For Official Use Only

Comments

C C

Installation's EPA ID Number — T/A C 1 — Approved — Date Received (yr. mo. day)

C F

I. Name of Installation

U . S . M A R I N E C O R P S B A S E

II. Installation Mailing Address

Street or P.O. Box

C 3 F A C I L I T I E S D E P T

City or Town — State — ZIP Code

C 4 C A M P L E J E U N E — N C — 2 8 5 4 0

III. Location of Installation

Street or Route Number

C 5 U . S . M A R I N E C O R P S B A S E

City or Town — State — ZIP Code

C 6 C A M P L E J E U N E — N C — 2 8 5 4 2

IV. Installation Contact

Name and Title *(last, first, and job title)* — Phone Number *(area code and number)*

C 2 A L E X A N D E R , R E N V E N G — 9 1 9 4 5 1 3 0 3 4

V. Ownership

A. Name of Installation's Legal Owner — B. Type of Ownership *(enter code)*

C R B R I G G E N J . B . K N O T T S — F F

VI. Type of Regulated Waste Activity *(Mark 'X' in the appropriate boxes. Refer to instructions.)*

A. Hazardous Waste Activity

- [X] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo.
- [X] 2. Transporter
- [X] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [ ] 5. Market or Burn Hazardous Waste Fuel *(enter 'X' and mark appropriate boxes below)*
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [X] 6. Off-Specification Used Oil Fuel *(enter 'X' and mark appropriate boxes below)*
  - [X] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer (Or On-Site Burner) Who First Claims the Oil Meets the Specification.

VII. Waste Fuel Burning: Type of Combustion Device *(enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)*

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation *(transporters only — enter 'X' in the appropriate box(es)*

- [ ] A. Air
- [ ] B. Rail
- [X] C. Highway
- [ ] D. Water
- [ ] E. Other *(specify)*

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [ ] A. First Notification
- [ ] B. Subsequent Notification *(complete item C)*

C. Installation's EPA ID Number: N C 6 1 7 0 0 2 2 5 8 0

Continue on reverse

ID — For Official Use Only																				T/A	C
C																					
W																					1

Description of Hazardous Wastes *(continued from front)*

Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 *CFR* Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 *CFR* Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 *CFR* Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

Listed Infectious Wastes. Enter the four-digit number from 40 *CFR* Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 — 261.24)*

☐ 1. Ignitable *(D001)* ☐ 2. Corrosive *(D002)* ☐ 3. Reactive *(D003)* ☐ 4. Toxic *(D000)*

Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature	Name and Official Title *(type or print)*	Date Signed
	R. A. TIEBOUT AC/S, Facilities	30 JAN 1986

EPA Form 8700-12 (Rev. 11-85) Reverse

BILLING CODE 6560-50-C

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

6280/2
FAC

28 MAY 1986

Mr. William Myer, Head
Solid and Hazardous Waste Management Branch
N. C. Division of Health Services
P. O. Box 2091
Raleigh, NC 27602-2091

Re: Amended Notification of Hazardous Waste Activity for Burning and Marketing Used Oil Fuel
NC 6170022580 - MCB Camp Lejeune

Dear Mr. Myer:

After further review of recently published regulations, we are amending the notification submitted on January 30, 1986. Because used oils generated at tactical vehicle shops presently contain listed hazardous wastes, the enclosed notification shows Camp Lejeune as "generator marketing to burner." Marketing for recycling or burning of used oils is currently performed through the Camp Lejeune office of Defense Reutilization and Marketing Office, Defense Logistics Agency.

The goal of our hazardous waste program is to segregate all HW from used oils. We anticipate the Base-wide management plan for both used oils and hazardous materials/waste, which will be published in June 1986, will greatly assist in meeting this goal. A copy of the plan will be provided for your use.

Please contact Mr. Bob Alexander, Marine Corps Base Environmental Engineer, 919-451-3034, should you desire further information on this matter.

Sincerely,

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

Encl:
(1) Notification of Hazardous Waste Activity, NC 6170022580, MCB, Camp Lejeune

Copy to:
USEPA, Region IV, Atlanta, Ga
CMC (LFL)
LANTDIV (Code 114)
CO, MCAS, NR (Grd Safety Mgr)
DRMO, Camp Lejeune

Blind copy to:
MAIN
NREAD
EnvEngr

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

8 MAY 1998

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 9-30-88.
GSA No. 0246-EPA-OT

United States Environmental Protection Agency
Washington, DC 20460

EPA Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

For Official Use Only

Comments

Installation's EPA ID Number | Approved | Date Received (yr. mo. day)

I. Name of Installation

U.S. MARINE CORPS BASE

II. Installation Mailing Address

Street or P.O. Box

FACILITIES DEPT

City or Town | State | ZIP Code

CAMP LEJEUNE | NC | 28542

III. Location of Installation

Street or Route Number

U.S. MARINE CORPS BASE

City or Town | State | ZIP Code

CAMP LEJEUNE | NC | 28542

IV. Installation Contact

Name and Title (*last, first, and job title*) | Phone Number (*area code and number*)

ALEXANDER RENVENG | 919 451 3034

V. Ownership

A. Name of Installation's Legal Owner | B. Type of Ownership (*enter code*)

MAJ GEN J.E. CASSITY | FF

VI. Type of Regulated Waste Activity (*Mark 'X' in the appropriate boxes. Refer to instructions.*)

A. Hazardous Waste Activity

- [X] 1a. Generator
- [ ] 1b. Less than 1,000 kg/mo.
- [X] 2. Transporter
- [X] 3. Treater/Storer/Disposer
- [ ] 4. Underground Injection
- [X] 5. Market or Burn Hazardous Waste Fuel (*enter 'X' and mark appropriate boxes below*)
  - [X] a. Generator Marketing to Burner
  - [X] b. Other Marketer
  - [ ] c. Burner

B. Used Oil Fuel Activities

- [ ] 6. Off-Specification Used Oil Fuel (*enter 'X' and mark appropriate boxes below*)
  - [ ] a. Generator Marketing to Burner
  - [ ] b. Other Marketer
  - [ ] c. Burner
- [ ] 7. Specification Used Oil Fuel Marketer – (Or On-Site Burner) Who First Claims the Oil Meets the Specification.

VII. Waste Fuel Burning: Type of Combustion Device (*enter 'X' in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.*)

- [ ] A. Utility Boiler
- [ ] B. Industrial Boiler
- [ ] C. Industrial Furnace

VIII. Mode of Transportation (*transporters only — enter 'X' in the appropriate box(es)*)

- [ ] A. Air
- [ ] B. Rail
- [X] C. Highway
- [ ] D. Water
- [ ] E. Other (*specify*)

IX. First or Subsequent Notification

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

- [ ] A. First Notification
- [ ] B. Subsequent Notification (*complete item C*)

C. Installation's EPA ID Number: NC6170022580

EPA Form 8700-12 (Rev. 11-85) Previous edition is obsolete.

Continue on reverse

Dany DDS

6241/1
NREAD(L)
18 Nov 1986

From: Supervisory Chemist, Water Quality Control Laboratory, Environmental Branch, Natural Resources and Environmental Affairs Division
To: Director, Natural Resources and Environmental Affairs Division

Subj: 2d Supply Battalion's Request for Analysis

Ref: (a) 2nd FSSG SER 4/ZA6140 ltr 5100 of 23 Oct 1986

1. The reference requests identification of 22 barrels located at the flammable storage area. I have not been able to get out and look at the barrels.

2. If the usual parameters are run, Corrosivity, Ignitibility, Reactivity and E. P. Toxicity for metals, at approximately $600 per sample, the 22 barrels would cost $13,200.

3. Before the samples can be taken, arrangements will need to be made for analysis. Previously, we have sent the samples to LANTDIV's contract lab. However, this year will probably have to have prior permission and forward funds ahead of time. The other choice is to contract our own laboratory but this will take time for bids.

4. The estimated $13,200 for 2nd FSSG's barrels and the estimated $10,800 for the MCAS-NR's barrels is based on $600 per sample. If the 40 barrels are arranged for together we can probably get a discount on the unit price. Since we already have 40 barrels and there will probably be more to come, if we have the time, it might be a good idea to get our own contract to cover hazardous waste monitoring.

Elizabeth A. Betz

UNITED STATES MARINE CORPS
2d Supply Battalion
2d Force Service Support Group (REIN)
Fleet Marine Force, Atlantic
Camp Lejeune, North Carolina 28542-5703

In reply refer to:
5100
SER 4/ZA6140
23 Oct 1986

From: Commanding Officer, 2d Supply Battalion
To: Commanding General, Marine Corps Base (Attn: Director NREAD)

Subj: IDENTIFICATION OF HAZARDOUS MATERIAL

Ref: (a) MCO 5100.25
(b) CG 2d FSSG ltr 48/PWM/kty 6240 of 7 Aug 1980

1. The references require labelling of hazardous materials held in stock, for inventory and disposal purposes.

2. Presently, this command maintains twenty two (22) 55 gallon containers of unidentified substances located at the flammable storage area.

3. Weathering conditions have rendered most exterior markings unreadable, however the following items were identified:

a. Automatic transmission fluid
b. Lube, oil gear
c. 140 solvent
d. cleaning solvent

4. It is requested that these materials be identified to enable proper disposal/recontainerization.

5. Point of contact is WO H.J. CLAY at extensions 3405/3418.

U. L. MORTON
By direction

NOTE

equired for follow-up or working

file. S

TO:

// NREAD

PARE FOR SIGNATURE

ORT BACK

URN

COORD w/ NREAD

= Dec 86

B

Danny

See attached

File

Haz Waste

Do we want to pursue this?

Pls coord & discuss w/ FSSG, and Base Gas Chamber (Gysgt Martin 3518).

V/R

BOA

DRMO coordinates with utilities. Volume generated exceeds current perceived CAPACITY.

FROM: Danny Shaya

DATE

EXT.

OPNAV 5216/142 (Rev. 5-74) S/N 0107-LF-778-7110 ☆ U.S. Government Printing Office: 1982—505-106/8666 2-1

DEPARTMENT OF THE NAVY SELF-DUPLICATING

Use only for informal, personally hand-written notes. Make duplicate only when

Prepare correspondence memos for formal, official memoranda.

ACTION	COORDINATE	
AS DISCUSSED	CORRECTION	

DEPARTMENT OF THE NAVY SELF-DUPLICATING NOTE

Use only for an informal, preferably hand-written note. Make duplicate only when required for follow-up or working file. See correspondence manual for formal, official memoranda.

TO: BMAIN / UTILITIES // NREAD

☐ ACTION	☐ COORDINATE	☐ PREPARE FOR SIGNATURE
☐ AS DISCUSSED	☐ CORRECTION	☐ REPORT BACK
☐ CALL/SEE ME	☒ INFORMATION	☐ RETURN
☐ COMMENT/CLEAR	☐ PREPARE DRAFT	☒ COORD W/ NREAD

RE: HQ DRMS 181510Z Dec 86

DISPOSAL OF STB

Do we want to pursue this?

Pls coord & discuss w/ FSSG, and Base Gas Chamber (Gy Sgt Martin 3518).

V/R

BOA

DRMO coordinates with utilities. Volume generated exceeds current perceived CAPACITY.

FROM: Danny Shaya

DATE

EXT.

OPNAV 5216/142 (Rev. 5-74) S/N 0107-LF-778-7110 ☆ U.S. Government Printing Office: 1982—505-106/8666 2-1

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

NREAD
Bob Alexander 12/29

ROUTINE

R 181510Z DEC 86

FM HQ DRMS BATTLE CREEK MI//L//

TO DRMR MEMPHIS TN//MFL// AIG 4664
AIG 11800

UNCLAS

INFO ONLY AIG 4664 AND AIG 11800
SUBJ: DRMO-HOOD MIP 86-HD-009, SUPER TROPICAL BLEACH (STB)
FUNCTIONAL AREA: ENVIRONMENTAL

1. DRMS APPROVES SUBJECT MIP PROCEDURE FOR GENERATOR DILUTION AND NEUTRALIZATION OF SUPER TROPICAL BLEACH (STB) IN RUSTY AND LEAKY CONTRAINERS FOR DISPOSAL BY THEIR LOCAL SEWAGE DISPOSAL FACILITY RATHER THAN TURN-IN TO THE DRMO. DRMO UPON INSPECTION AND DETERMINATION THAT THE STB IS NOT USABLE WILL ADVISE HOST ENVIRONMENTAL OFFICE OF THE STB TO BE DISPOSED OF. UPON HOST APPROVAL THE DRMO WILL ADVISE THE GENERATOR TO DELIVER THE STB TO THE SEWAGE DISPOSAL FACILITY. THIS PRACTICE IS IN CONSONANCE WITH CURRENT WASTE MINIMIZATION INITIATIVES.

2. GENERATORS WILL TURN IN USABLE STB IN SAFE-TO-HANDLE OR, AS REQUIRED, OVERPACK CONTAINERS TO THE DRM FOR R/T/D AND SALES PROCESSING.

3. THE PROCEDURE PROPOSED BY SUBJECT MIP HAS POTENTIAL FOR DRMS-WIDE IMPLEMENTATION AND SHOULD, AS APPLICABLE, BE IMPLEMENTED BY OTHER DRMO'S. DRMS-H WILL INITIATE IMPLEMENTATION GUIDANCE TO THE MILITARY SERVICES AND DRMS FIELD ACTIVITIES.

4. DRMS EXTENDS CONGRATULATIONS TO MIP SUBMITTER AND SUGGESTS THE PROCEDURE BE CONSIDERED FOR SUBMISSION AS A BENEFICIAL SUGGESTION.

5. DRMS POINT OF CONTACT IS MR. DON SEVERSON, AUTOVON 932-5896.

6. MIP: MAKING IDEAS PAY.

BT

DLVR:DRMO CAMP LEJEUNE NC(4)...ACT

BOSM(2)...ACT FOR CG MCB CAMP LEJEUNE(18) 18442/ 3/0128
BCOS(1) BSDO(1) CEOA(1) GSTF(12) OICB(1)

RTD:074-000/COPIES:0022

576942/352 1 OF 1 MATA0451 352/20:31Z 181510Z DEC 86
CSN:AUIA01660 HQ DRMS BATTLE

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

RECENTLY CITED VIOLATIONS (26/27 JUNE 1986, EPA INSPECTION) APPLICABLE TO HAZARDOUS WASTE GENERATION AND HANDLING SITES:

1. Failure to provide personnel training.
2. Failure to maintain written job descriptions and training records.
3. Failure to post site specific spill contingency plans.
4. Failure to perform weekly inspections.
5. Failure to properly label containers.
6. Failure to properly date containers.
7. Failure to dispose of hazardous waste within 90 days.
8. Improper storage of empty batteries (i.e., storage upside down so as to allow leakage to environment).

HAZARDOUS WASTE MANAGEMENT OBJECTIVES

1. To minimize dumping of solvents into waste oil.
2. To minimize the number of sites where hazardous wastes are generated and stored.
3. To make personnel working at sites where hazardous wastes are handled and stored aware of special requirement which must be addressed if compliance with EPA regulations is to be maintained.
4. To minimize the number of people routinely handling hazardous wastes.
5. That personnel routinely working around hazardous waste and hazardous materials know what to do in case of spill or other emergency.
6. That supervisors/NCO's/SNCO's/Officers responsible for hazardous waste management are capable of showing EPA inspectors around their work areas, explaining the hazardous waste activity carried out in the work area, and demonstrating to the inspector that the shops have hazardous waste management under control.
7. That each battalion/separate company commander establishes internal inspections and other management controls on hazardous waste handling required to provide satisfactory compliance with hazardous waste regulations.
8. That appropriate disciplinary action be taken against personnel refusing to satisfactorily comply with hazardous waste regulations.

6241/3
NREAD(L)
4 Nov 86

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) BO6240.5

Encl: (1) IEA Report No. 231-18 dtd 18 Aug 1986
(2) IEA Report No. 304-11 dtd 1 Oct 1986
(3) IEA Report No. 304-9 dtd 3 Oct 1986
(4) Transformer Oil Sample List

1. Enclosure (1) provides the PCB analysis of the liquid on the floor of the transformer vault at Camp Johnson. Enclosure (2) provides the PCB analysis of the oil and water in the pond located behind Bldg. 45. Enclosure (2) also provides the PCB analysis of the transformer that was leaking on 23 Sep 1986 behind Bldg. 905. Enclosure (3) also contains the PCB analysis of the Transformer located in the transformer vault at the High School. Enclosure (4) relates the sample number to the serial number or sample point.

2. Point of contact in this matter is Elizabeth Betz, extension 5977.

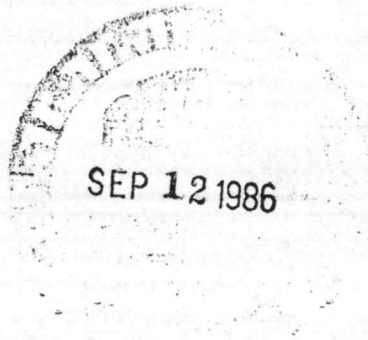
J. I. WOOTEN

Blind copy to:
Lab (2)

Third copy to:
Lab (5)

Industrial & Environmental Analysts, Inc.
P.O. Box 12846 • Research Triangle Park, NC 27709 • 919-467-9919

August 18, 1986



Contracting Division
P.O. Box 8368, MCB
Camp Lejeune, NC 28542-8368

Attn: Seargent Dingle

Reference: IEA Report No. 231-18

Dear Sgt. Dingle:

Transmitted herewith are the results of analyses on a single sample submitted to our laboratory on August 14, 1986.

		Bldg. MCBCL 1636	Doorway MCBCL 1637
Total PCB	mg/kg	< 1.0	< 1.0

Very truly yours,

INDUSTRIAL & ENVIRONMENTAL ANALYSTS, INC.

Joseph B. Adamovic
Senior Chemist

JBA/sme

ENCLOSURE (1)

Industrial & Environmental Analysts, Inc.
P.O. Box 12846 • Research Triangle Park, NC 27709 • 919-467-9919

October 1, 1986

Elizabeth Betz
Quality Control Lab
Building 1103
Camp Lejeune, NC 28542

Reference: IEA Report No. 304-11

Dear Ms. Betz:

Transmitted herewith are the results of analyses on three samples submitted to our laboratory on September 25, 1986.

		1686 Oil	1685 Oil	1685 Water
Total PCB	mg/Kg	5.6	<1.0	<0.5

Very truly yours,

INDUSTRIAL & ENVIRONMENTAL ANALYSTS, INC.

Joseph B. Adamovic
Senior Chemist

JBA/jcl

ENCLOSURE (2)

October 3, 1986
IEA Report No. 304-9

	Aroclor 1242 µg/g	Aroclor 1254 µg/g	Aroclor 1260 µg/g	Total Aroclors µg/g
1635			480,000	480,000
1638		15		15
1639		9	8	17
1640			11	11
1641		7	11	18
1642				<1.0
1643				<1.0
1644			520	520
1645				<1.0
1646				<1.0
1647	1.9			1.9
1648			1.4	1.4
1649			1.2	1.2
1650			140	140
1651		2.8		2.8
1652		8	10	18
1653			37	37
1654				<1.0
1655				<1.0
1656				<1.0
1657				<1.0
1658			200	200
1659				<1.0
1660				<1.0
1661			6.9	6.9
1662				<1.0
1663			16	16
1664			4.6	4.6

ENCLOSURE (3)

October 3, 1986
IEA Report No. 304-9

	Aroclor 1242 µg/g	Aroclor 1254 µg/g	Aroclor 1260 µg/g	Total Aroclors µg/g
1665				<1.0
1666				<1.0
1667			30	30
1668				<1.0
1669	2200			2200
1670				<1.0
1671				<1.0
1672				<1.0
1673				<1.0
1674			2.2	2.2
1675		260		260
1676			2.6	2.6
1677				<1.0
1678			540	540
1679			1.8	1.8
1680			2.1	2.1
1681		1.1		1.1
1682				<1.0
1683			2.7	2.7
1684		15	13	28

TRANSFORMER OIL SAMPLES

SAMPLE NUMBER	SERIAL NUMBER	BRAND	KVA	CAPACITY	SAMPLER	DATE
1635	251978	AC		11 GALLONS	IRELAND + BETZ	JULY 1986
1636	LEAK AT CAMP JOHNSON - LIQUID IN DOORWAY				BETZ +	13 AUG 1986
1637	LIQUID IN BLDG				BARBEE	13 AUG 1986
1638	3004017	W	15		BETZ [illegible] D	5 SEP 86
1639	3004009	W	15			
1640	1834572	AC	37.5			
1641	1834574	AC	37.5			
1642	1832558	AC	37.5			
1643	1797684	AC	37.5			
1644	6961550	GE	37.5			
1645	L7274 79Y74AA	GE	75			
1646	35978-4075	HOWARD	50			
1647	6917445	ESCO	25			
1648	623972	ESCO	15			
1649	86733	MARCUS	37.5			
1650	60731	MARCUS	"			
1651	86732	MARCUS	37.5			
1652	18345-73	AC	37.5			
1653	3851731	W	15			
1654	125198-604	GE	15			
1655	6396899	W	15			
7134 1656	M671134	DS	10			
1657	M827192Y ERA	GE	37.5			

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

ENCLOSURE (4

LAB 4-11 (Rev 11/85)

TRANSFORMER OIL SAMPLES

SAMPLE NUMBER	SERIAL NUMBER	BRAND	KVA	CAPACITY	SAMPLER	DATE
1658	6398907 ~~2403498~~	W	15		Beal	3 SEP 86
1659	D904108-59Y	GE	50			
1660	R100710	DS	50			
1661	4811363	ESCO	25			
1662	4811362	ESCO	25			
1663	6607475	GE	45			
1664	3370214	AC	75/84			
1665 ~~1666~~	66AA1873	W	75			
1666	83A050243	W	37.5			
1667	57F226966	W	10			
1668	81A342336	W	50			
1669	77V8060	VANTRAN	15			
1670	N14861	DS	15			
1671	1341169	LM	25			
1672	1349266	LM	25			
1673	1349289	LM	25			
1674	6424527	W	10			
1675	65K9202	W	5			
1676	D-1242-A	FISLER ENG CO	15			
1677	MS27188YERA	GE	37.5			
1678	6968586	GE	5			
1679	6424534	W	10			
1680	6424531	W	10			V

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

LAB 4-11 (Rev 11/85)

TRANSFORMER OIL SAMPLES

SAMPLE NUMBER	SERIAL NUMBER	BRAND	KVA	CAPACITY	SAMPLER	DATE
1681	101278	S	5		Berz	23 SEP 86
1682	125098-604	GE	10			
1683	101267	S	5			
1684	1833734	AC	10			
1685	Pond @ Bldg	45	—	—	Berz Barbee	23 Sep 86
OP 1686	6H27912	Westhouse	25		↓	↓
1687						

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

6240
NREAD
5 Nov 86

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 PACKAGE SJA 5800 SJA4 of 30 Oct 87 w/end dtd 31 Oct 86

Ref: (a) FONECON btwn LtCol Wellington, SJA Office, and Mr. J. I. Wooten, NREAD, on 5 Nov 86

1. During the reference, the subject program was discussed. I advised LtCol Wellington I had a copy of his 30 Oct 86 memo for the Commanding General. He advised there were some very candid comments and the package was of a sensitive nature and should be kept close "under lock and key." I informed LtCol Wellington I would comply with his request and advise the AC/S Facilities.

J. I. WOOTEN

Haz Waste
Fill
Fill

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 05 NOV 1986

TO:

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

ATTN: _____

1. Attached is forwarded for info/action.

Copy furnished Alexander, Env. Eng -

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

3. Your file copy.

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

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

James G. Martin, Governor
Phillip J. Kirk, Jr., Secretary

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

October 13, 1986

MEMORANDUM:

TO: N.C. Generators; Transporters; and Treaters, Storers or Disposers (TSD's) of Hazardous Waste

FROM: William L. Meyer, Head Bill Meyer
Solid & Hazardous Waste Management Branch
Environmental Health Section

SUBJECT: Implementation of revised state RCRA compliance program

In order to provide an effective compliance-enforcement program, the North Carolina Solid & Hazardous Waste Management Branch - Hazardous Waste Compliance Unit, has implemented the following RCRA inspection schedule for FY 1987 (October 1, 1986 - September 30, 1987).

1. Generators/Transporters: 1 insp./year
   Treatment, Storage, Disposal 2 insp./year
   (of these inspections 10% will be unannounced)

2. Subsequently, and in addition, all generators; transporters; and treatment, storage, or disposal facilities will be subject to an unannounced site evaluation. This evaluation will primarily consist of a site appraisal focusing on physical hazardous waste management activities (hazardous and raw product storage areas, emergency equipment, inspection logs, areas subject to disposal/release, etc.). If violations are found on this evaluation, a comprehensive RCRA inspection will be conducted.

3. Class I violations will continue to be addressed with a compliance order and administrative penalty.

5569A

6241/3
NREAD(L)
4 Nov 86

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) BO6240.5

Encl: (1) IEA Report No. 304-9 dtd 3 Oct 1986
(2) Transformer Oil Sample List

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

2. The results indicate that three of the transformers stored at Lot 140 have over 500 parts per million (ppm) PCB's and are "PCB Transformers." Three transformers had 50 to 499 ppm of PCB'S which requires management as "PCB contaminated transformers." These 6 transformers should be turned in to DRMO per the reference and stored at the TP-451 DRMO facility.

3. The remaining transformers should be turned in to DRMO and stored at Lot 203.

J. I. WOOTEN

Copy to:
DRMO (w/o Encls)

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

ROUTINE

R 291625Z OCT 86

FM CG MCB CAMP LEJEUNE NC

TO CG SECOND MARDIV
CG SECOND FSSG
HQ NUC II MAF
NAVDENCLINIC CAMP LEJEUNE NC
CG SIXTH MAB
CG II MAF
NAVHOSP CAMP LEJEUNE NC
MCB CAMP LEJEUNE NC

INFO MCAS NEW RIVER NC

UNCLAS //N06280//

SUBJ: HAZARDOUS MATERIAL DISPOSAL PROGRAM

A. BO 6240.5
B. ON-SITE HAZARDOUS WASTE (HW) INSPECTION BY EPA AND STATE DHS OF

26 JUN 86

1. REF (A) PROMULGATES THE RESPONSIBILITIES, PROCEDURES AND GUIDELINES FOR HAZARDOUS MATERIAL (HM) AND HW HANDLING, LABELING, PACKAGING, STORAGE AND TRANSPORTATION. COMPREHENSIVE FEDERAL LEGISLATION HAS PLACED STRINGENT LEGAL REQUIREMENTS ON THE MANAGEMENT OF HM AND HW. CIVILIAN AND MILITARY PERSONNEL FAILING TO FOLLOW ESTABLISHED PROCEDURES MAY BE SUBJECT TO BOTH CIVIL AND CRIMINAL PENALTIES. STRICT ADHERENCE TO ESTABLISHED PROCEDURES IS NECESSARY TO AVOID IMPOSITION OF CIVIL AND/OR CRIMINAL PENALTIES.

2. THE PURPOSE OF THIS MSG IS TO ADVISE ORGANIZATIONAL PERSONNEL THAT MCB ENVIRONMENTAL PERSONNEL WILL BEGIN COMPLIANCE INSPECTIONS

DLVR:CG SIXTH MAB(6)...ACT
DLVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...ACT
DLVR:NAVHOSP CAMP LEJEUNE NC(4)...ACT
DLVR:HQ NUC II MAF(7)...ACT

NREA(2)...ORIG FOR CG MCB CAMP LEJEUNE(118) /13/
BFAC(1) GSTF(12) SSTF(85) OCDR(14) CEOA(1) BSDO(1) BCOS(1)
OICB(1)

G-4(1)...ACT FOR CG II MAF(3) 06200/ 7/0116
CFU(1) S-S(1)

RTD:000-075/COPIES:0142

432290/303 1 OF 2 MATA0034 303/00:11Z 291625Z OCT 86
CSN:RXIC00002 CG MCB CAMP LE

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

OF ALL WORK SITES/SHOPS WHERE HW ARE ROUTINELY GENERATED OR STORED. USED SOLVENTS, DEGREASERS, ELECTROLYTE, LITHIUM BATTERIES AND WASTE OIL WITH CERTAIN REGULATED CONTAMINANTS ARE EXAMPLES OF ROUTINELY GENERATED HW. THE SUBJ INSPECTIONS ARE BEING INITIATED IN RESPONSE TO REF (B) WHICH IDENTIFIED SERIOUS DISCREPANCIES REGARDING IMPLEMENTATION OF FEDERAL/STATE REGULATIONS OUTLINED IN REF (A).

3. THE INSPECTIONS WILL BE CONDUCTED UNDER THE COGNIZANCE OF THE DIR, NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS (NREA). INSPECTIONS WILL BE SCHEDULED IN COOPERATION WITH HMDCS FOR EACH MAJOR CMD. EACH INSPECTION WILL RESULT IN A WRITTEN REPT LISTING SPECIFIC VIOLATIONS OF REF (A) AND THE REGULATIONS CITED THEREIN. THE INSPECTIONS WILL BE AT THE BN/SEPARATE COMPANY (OR EQUIVALENT) LEVEL AND WILL CONSIST OF THE FOLLOWING:

A. AN INBRIEF FOR THE COGNIZANT S-4 AND OTHER OFFICIALS.

B. A REVIEW OF BN/COMPANY RECORDS AND EFFORTS TO ENSURE COMPLIANCE WITH REF (A).

C. AN INSPECTION OF SELECTED HW GENERATION AND STORAGE SITES.

D. AN OUTBRIEF FOR THE COGNIZANT S-4.

E. TRANSMITTAL OF A WRITTEN INSPECTION REPT LISTING DISCREPANCIES AND REQUIRED CORRECTIVE ACTION VIA THE CHAIN OF COMMAND.

F. A REINSPECTION TO DETERMINE ADEQUACY OF FOLLOWUP CORRECTIVE ACTION. THE REINSPECTION WILL BE CONDUCTED APPROXIMATELY 15 DAYS AFTER THE ORIGINAL INSPECTION UNLESS OTHERWISE SPECIFIED IN THE INSPECTION REPT.

4. POC ON THIS MATTER IS MR. DANNY SHARPE, NREA, EXTS 2083/2195.

BT

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

3 Nov 86
Date

From: Director
To: File Hz Waste

Subj:

Copy sent to AC/S Fac.
+ S & T 3 Nov 86

J. M

UNITED STATES MARINE CORPS
Natural Resources and Environmental Affairs Division
Marine Corps Base
Camp Lejeune, North Carolina 28542

IN REPLY REFER TO:
6240
NREAD
31 Oct 86

From: Supervisory Ecologist
To: Record

Subj: HAZARDOUS WASTE MANAGEMENT

Ref: (a) FONECON btwn Mr. Dave Ellison, EPA Region IV, and Mr. Danny Sharpe, NREAD of 29 Oct 86
(b) EPA Inspection of 26 June 86
(c) EPA ltr of 14 Aug 86
(d) BO 6240.5

1. During reference (a) Mr. Ellison was brought up to date on the ongoing negotiations between Base and the N. C. Division of Health Services (DHS). Reference (a) was initiated by Supervisory Ecologist in an attempt to inform Mr. Ellison of the significant progress made by Base to correct hazardous waste (HW) management discrepancies identified during reference (b) and documented by reference (c). Mr. Ellison seemed pleased that his inspection (reference (b)) had led to such a positive impact on increasing command awareness of HW compliance issues. He was particularly pleased by the possibility of increased HW staffing. He was not advised as to actual size of increase being considered.

2. The specific purpose of reference (a) was to express my concern that there may be some planned unilateral enforcement action by EPA. I referenced the pending EPA HW reinspection. I asked how this inspection fit into the ongoing enforcement action by DHS. I pointed out that considering the effectiveness of States efforts in getting command support, any drastic acceleration of enforcement action may be counter productive. Mr. Ellison appeared to appreciate that our Commanding General had inherited a HW problem. I advised Mr. Ellison that in order to get maximum increased HW compliance, there needs to be a "light at the end of the tunnel". I defined "tunnel" as the series of corrective actions that the Commanding General will undertake to deal with compliance problems caused by constant turnover of military personnel at the approximately 150 HW generation sites. I defined "Light " as the establishment of a mutual understanding that successful implementation of required corrective action will result in avoidance of significant adverse impact of these inherited problems on Key Officials careers.

3. Mr. Ellison appeared to understand that were an enforcement action be taken which posed such an adverse impact, that Base officials would be faced to expend efforts to defend themselves which would seriously detract from efforts currently underway to achieve compliance. Mr. Ellison promised to closely coordinate his actions with Mr. Rhodes of DHS. Hopefully, Mr. Ellison will be in a position to influence pending regulatory efforts.

6240
NREAD
31 Oct 86

Subj: HAZARDOUS WASTE MANAGEMENT

4. Based on reference (a), I recommend that a letter documenting the NREAD HW Staff increase be sent to both EPA and DHS. Making EPA and DHS officials aware of the planned staffing increase should facilitate dealing with both agencies on HW deficiencies at Camp Lejeune. Up to this point, both EPA and DHS officials have appeared satisfied with the HW management concept outlined in reference (d) and the proposed revision to reference (d).

Danny D Sharpe

DANNY D. SHARPE

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

6280/2
FAC
31 OCT 1986

FIRST ENDORSEMENT on SJA memo for the CG 5800 SJA4 of 30 Oct 1986

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

Subj: 1986 EPA HAZARDOUS WASTE (HW) INSPECTION/NORTH CAROLINA ENFORCEMENT ACTION

Encl: (7) CG MCB ltr 6240 NREAD dtd 15 Jul 1986
(8) CG MCB 291625Z Oct 86

1. Upon conclusion of the 26-27 June 1986 inspection by EPA/NC hazardous waste management personnel, we took a hard look into our hazardous waste management program. We found two areas that required immediate attention.

a. Additional personnel are required by our Natural Resources and Environmental Protection Division (NREAD) to administer and inspect the over 150 waste generation sites at Camp Lejeune.

b. A greater awareness and attention to established procedures is required by all personnel, especially at HW generation sites.

2. One additional environmental protection specialist has already been assigned to NREAD and is being trained to work in our inspection program. I currently have action in progress to add four additional environmental protection specialists to NREAD. Manpower ceilings have necessitated reallocation of personnel and funds to accomplish the above actions.

3. Enclosure (7) was distributed to Marine Corps Base organizations on 15 July 1986 to enhance awareness and effectively organize our program on the Base side. Enclosure (8) was published on 29 October 1986 instituting our compliance inspection program of all work sites/shops where hazardous wastes are routinely generated or stored.

4. In addition to the above actions, NREAD hazardous wastes specialists have briefed the Assistant Chief of Staff, G-4 of both 2nd Marine Division and 2nd FSSG on the problems and the programs required to come in compliance with EPA/NC regulations. They were asked to convey this concern down to the generation sites. A revision to the Base Order on the Hazardous Waste

Subj: 1986 EPA HAZARDOUS WASTE (HW) INSPECTION/NORTH CAROLINA ENFORCEMENT ACTION

Management Program has been completed and will be ready for signature in a few weeks. I plan to develop a brief to present to the Commanders and General Staff of both 2nd Marine Division and 2nd FSSG prior to December 1986. The brief is intended to advise of the problem and actions required by all concerned.

5. We are making every effort to correct discrepancies, and we sincerely hope we have a good handle on this program when the next inspection is scheduled. I remain optimistic and concerned.

Very respectfully,

T. J. DALZELL
AC/S, Facilities

Copy to:
SJA
NREAD

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

Folder
File

IN REPLY REFER TO
6240
NREAD
15 JUL 1986

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Distribution List

Subj: HAZARDOUS MATERIAL DISPOSAL PROGRAM

Ref: (a) BO 6240.5
(b) Onsite Environmental Protection Agency (EPA) Inspection of 26-27 Jun 86

Encl: (1) Hazardous Material Disposal Coordinator (HMDC) and Hazardous Material Disposal Officer (HMDO) Duties
(2) Hazardous Waste (HW) Inspection Forms

1. Reference (a) established internal procedures and responsibilities for implementing the subject program. During reference (b) several ongoing discrepancies were cited by outside regulatory agencies. Improvement of internal controls and personnel training appear to be the best approach to dealing with these discrepancies. The purpose of this memorandum is to revise responsibilities for implementation of the subject program within Marine Corps Base. Reference (a) is currently under revision and will reflect changes contained herein.

2. The following changes in responsibilities for the subject program are effective immediately.

a. The Director, Natural Resources and Environmental Affairs Division (NREAD) is responsible for providing a base HMDC. HMDC duties are outlined in enclosure (1).

b. Each addressee is responsible for appointing a primary and at least one alternate HMDO. HMDO duties are outlined in enclosure (1).

c. Names, addresses and phone numbers of primary and alternate HMDO's will be provided to the Assistant Chief of Staff, Facilities, Marine Corps Base, not later than two weeks after the date of this memorandum. Within four weeks of the date of this memorandum, the Director, NREAD, will conduct a HW training workshop for HMDO's.

6240
NREAD

Subj: HAZARDOUS MATERIAL DISPOSAL PROGRAM

3. Additionally, the Director, NREAD, will immediately begin an annual inspection of base operated HW generation and storage facilities. Inspection format is shown in enclosure (2). NREAD will provide copies of inspection to cognizant HMDO. HMDO will initiate appropriate corrective action.

4. Point of contact on this matter is Mr. Danny Sharpe, NREAD, extensions 5003/2083.

T. J. Dalzell

T. J. DALZELL
By direction

DISTRIBUTION:
CO MCES
CO RR DET
CO FLDMEDSVSSCHLS
CO MCSSS
CO RSU
CO ITS
CO SUP BN
CO HDQTRS BN
AC/S MWR
AC/S LOG
BMO

Responses given to Danny Sharpe.
He will handle from here on
8-6-86.
pj

DUTIES OF HAZARDOUS MATERIAL DISPOSAL COORDINATOR (HMDC)
AND HAZARDOUS MATERIAL DISPOSAL OFFICER (HMDO)

1. General. There will be a primary and an alternate HMDC for Marine Corps Base. The primary HMDC is Mr. Danny Becker, NREAD, telephone extensions 1690/2083. Each base organization with significant hazardous material (HM) and hazardous waste (HW) disposal activity will appoint a primary and secondary HMDO to carry out the duties described in section 3 below. Commanding Officers and heads of the following organizations will each provide a HMDO: MCES, MCSSS, Field Medical Services Schools, RSU, Rifle Range Detachment, ITS, Headquarters Bn, Support Bn, AC/S MWR, AC/S Logistics and BMO.

2. Duties of Base HMDC.

a. Provide assistance to HMDO's in handling HW management problems.

b. Perform annual inspections of HW generation and storage sites and notify HMDO's of corrective action required to provide compliance with BO 6240.5

c. Inform HMDO's of any changes in regulations affecting HW activities under the HMDO's cognizance.

d. To serve as command point of contact with federal and state regulatory personnel on matters dealing with worksite HW inspections.

e. To develop listings of HW generation and storage facilities.

f. To develop and provide to the Civilian Personnel Department (CPD) the HW training requirements for base HMDO's

3. Duties of HMDO

a. To provide assistance to HW generators and handlers in the preparation and timely submittal of HW turn-in documents per BO 6240.5.

b. Perform quarterly inspections of HW generation and storage sites and notify OIC's of corrective action required to provide compliance with BO 6240.5

c. Keep OIC's and key personnel informed of any changes in regulations affecting HW activities within the HMDO's cognizance.

d. Develop a roster of personnel involved in HW management at each work site within the HMDO's cognizance.

e. Develop and provide to CPD HW training needs for personnel within the HMDO's cognizance.

ENCLOSURE (1)

f. Actively promote the reduction of volume and toxicity of HW produced by organizations within the HMDO's cognizance.

g. Conduct surveys required to identify HW generation and storage sites within the HMDO's cognizance and provide periodic updates as requested to the HMDC.

ENCLOSURE 1

HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: _____

1. Facility being Inspected: _____

2. Organization in Charge: _____

3. Inspection Participants/Phone Number: _____

_____

4. Description of HW Streams: _____

_____

_____

_____

5. Are records of HW generation consistent with HW streams? ___

6. HW Training

a. Are job descriptions available for all personnel avtively involved in HW management? _____

b. Are training records adequate/current? _____

c. Are alternate personnel assigned to key positions? _____
(If not, explain how unit deals with absence of key personnel)

d. Do contacted personnel demonstrate adequate knowledge of:

(1) Regulatory Requirements ____
(2) Applicable Base Orders ____
(3) Types of HW Handled ____
(4) Proper Containers ____
(5) Proper Labeling ____
(6) Weekly HW Inspections ____
(7) HW Turn-in Procedures ____
(8) Health and Safety ____
(9) Spill Reporting Procedures ____
(10) Spill Response Duties ____

7. Condition of Storage Facilities

a. Date of last Fire Dept Inspection? _____

b. Are spills likely to reach soil or water? _____

c. Are HW protected from weather? _____

d. Are weekly HW inspections conducted properly? _____

ENCLOSURE (1)

e. Are discrepancies corrected promptly? _____

f. Condition of containers? ("X" indicates discrepancy)

(1) Closed	_____	(7) Properly Labeled	_____
(2) Leaking	_____	(8) Properly Dated	_____
(3) Bulging	_____	(9) Properly Stacked	_____
(4) Collapsed	_____	(10) Properly Packaged	___
(5) Corroded	_____	(11) Meet DOT Requirements for Contents	_____
(6) Overfilled	____		

g. Are 90 day turn-in deadlines being met? _____

h. Are HW turn-in documents being prepared and submitted in a timely, proper manner? _____

i. Comments: _____

ENCLOSURE (1)

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U U N C L A S S I F I E D U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

ROUTINE

R 291625Z OCT 86

FM CG MCB CAMP LEJEUNE NC

TO CG SECOND MARDIV
CG SECOND FSSG
HQ NUC II MAF
NAVDENCLINIC CAMP LEJEUNE NC
CG SIXTH MAB
CG II MAF
NAVHOSP CAMP LEJEUNE NC
MCB CAMP LEJEUNE NC

INFO MCAS NEW RIVER NC

UNCLAS //N06280//

SUBJ: HAZARDOUS MATERIAL DISPOSAL PROGRAM

A. BO 6240.5
B. ON-SITE HAZARDOUS WASTE (HW) INSPECTION BY EPA AND STATE DHS OF

26 JUN 86

1. REF (A) PROMULGATES THE RESPONSIBILITIES, PROCEDURES AND GUIDELINES FOR HAZARDOUS MATERIAL (HM) AND HW HANDLING, LABELING, PACKAGING, STORAGE AND TRANSPORTATION. COMPREHENSIVE FEDERAL LEGISLATION HAS PLACED STRINGENT LEGAL REQUIREMENTS ON THE MANAGEMENT OF HM AND HW. CIVILIAN AND MILITARY PERSONNEL FAILING TO FOLLOW ESTABLISHED PROCEDURES MAY BE SUBJECT TO BOTH CIVIL AND CRIMINAL PENALTIES. STRICT ADHERENCE TO ESTABLISHED PROCEDURES IS NECESSARY TO AVOID IMPOSITION OF CIVIL AND/OR CRIMINAL PENALTIES.

2. THE PURPOSE OF THIS MSG IS TO ADVISE ORGANIZATIONAL PERSONNEL THAT MCB ENVIRONMENTAL PERSONNEL WILL BEGIN COMPLIANCE INSPECTIONS

DLVR:CG SIXTH MAF(6)...ACT
DLVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...ACT
DLVR:NAVHOSP CAMP LEJEUNE NC(4)...ACT
DLVR:HQ NUC II MAF(7)...ACT

NREA(2)...ORIG FOR CG MCB CAMP LEJEUNE(118) /13/
BFAC(1) GSTF(12) SSTF(85) OCDR(14) CEOA(1) BSDO(1) BCOS(1)
OICB(1)

G-4(1)...ACT FOR CG II MAF(3) 06200/ 7/0116
CFU(1) S-S(1)

RTD:000-075/COPIES:0142

432290/303 1 OF 2 MATA0034 303/00:11Z 291625Z OCT 86
CSN:RXIC00002 CG MCB CAMP LE

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U U N C L A S S I F I E D U

Julian's notes at Raleigh NC Meeting with DHS (S+HWM Br.)

(1) 10-27-86

31 Dec 86 Perspective EPA

Technical People - This Atty. % of compliance we can obtain

Forget agreement - Rhodes issue compliance order

compliance order will put Permit in jeporty

95% complied Rhodes

2 when to input 150 sites Hollyfield

we agreed to comply when we applied for Permit

compliance order - no specific amount time

Compliance agreement specified Time

Technical staff work closely

Menemuss have copy of Bens contingency plan.

our package would warn 2wks They will get back with us.

Be Fiddly order * Mr Rhodes

State way behind now

*Contingency Plan & Personnel Turn over problem

File Haz Waste

Ø File - Hg Waste

28 Oct 86

SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH

MEETING WITH

NAME Camp Lejeune ADDRESS Jacksonville, N. C.

DATE 10/27/86 EPA ID NUMBER NC6170022580 DOCKET NUMBER 00256

ATTENDING	REPRESENTING & PHONE NUMBER
Jerry Rhodes	NC S+HWM Branch (919) 733-2178
Doug Holyfield	" " " " "
Carol M. Schill	atty, N.C. SNWMB 919-733-2178
Julian Wooten	MARINE CORPS BASE CAMP LEJEUNE 919-451-1690
Danny Sharpe	" " " " "
Mary Jill Ledford	NC AG's Office 919-733-6890
J. Bellington	Office of the Staff Judge Advocate, MCB, CL, NC 2321

STATE OF 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)
NC6170022580

Administrative ~~Order on~~ Consent Agreement
Docket # 00256

STATEMENT OF PURPOSE

Pursuant to the North Carolina Solid Waste Management Act and rules, N.C.G.S. 130A, Article 9, and 10 NCAC 10F, as amended ("Act" and "rules"). The Complainant is William L. Meyer, Head, Solid and Hazardous Waste Management Branch, Department of Human Resources (hereinafter Branch). Respondent is Camp Lejeune Marine Corps Base (hereinafter USMCB).

The purpose of this Consent ~~Order~~ agreement is to address conditions in and around the USMCB's site at Onslow County, which will minimize the site's impact on the public health and environment in a manner which is consistent with the State and Federal hazardous waste laws and rules.

In order to protect the public health and environment, and to avoid costly protracted litigation, (USMCB) and the Branch by and through their authorized representatives, do enter into this ~~following~~ Consent ~~Order and agree~~ agreement as

~~STIPULATIONS~~ STATEMENT OF FACT AND LAW

2. To protect the public health and environment, the Solid and Hazardous Waste Management Branch, Environmental Health Section, Department of Human Resources of the State of North Carolina, is empowered to implement and seek compliance with the standards for generation, transportation, treatment, storage, and disposal of waste pursuant to the Solid Waste Management Act, N.C.G.S. Chapter 130-A(Act), and the rules promulgated there under at 40 CFR 260-271, codified at 10 NCAC 10F (rules). Mr. William L. Meyer, Head of the Branch, has been delegated those responsibilities.

3 USMCB is a United States Military installation which owns and/or operates an existing hazardous waste management facility (as defined in N.C.G.S. 130A-290(5) and 40 CFR 260.10, codified at 10 NCAC 10F .0002) at Onslow County. The USMCB treats, stores, or disposes of hazardous waste (as defined by N.C.G.S. 130A-290 and 40 CFR Part 261, codified at 10 NCAC 10F .0029).

4. The USMCB owns and/or operates approximately [redacted] 150 actual sites generating hazardous waste as defined in N.C.G.S. 130A-290(6) and 10 NCAC 10F .0002, located at Camp Lejeune, North Carolina and coming under the USMCB generator ID number.

5 40 CFR 262, codified at 10 NCAC 10F .0030, contains standards and requirements applicable to generators of hazardous waste.

6. On September 7, 1984, the USMCB was issued a permit by the Branch to store hazardous waste at the Camp Lejeune, North Carolina, facility.

1. The following matters are stated for the limited purpose of Branch and USMCB entering into this consent agreement and the statements herein are not binding on either party for the purpose of administrative/judicial enforcement proceedings.

7. 40 CFR 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.

8. Based on a joint/inspection by Branch/EPA personnel on June 26-27, 1986, the inspection found that the USMCB facility failed to meet the following requirements:

a. 40 CFR 262.21(a)(2), codified at 10 NCAC 10F .0030, states that the manifest must contain all of the following information; the generators name, mailing address, telephone number, and EPA identification number. The USMCB failed to use a generator I.D. number on the February 28, 1986 manifest.

b. 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without interim status, provided that the waste is placed in containers and the generator complies with Subpart I of 40 CFR 265. 40 CFR 265.174, codified at 10 NCAC 10F .0033, states that the owner or operator must inspect areas where containers are stored, at least weekly. The USMCB failed to perform weekly inspections of hazardous waste storage areas in and around building 909.

c. 40 CFR 262.34(a)(2), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without interim status, provided that the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. The USMCB failed to mark on each container of electrolyte solution, the date upon which each period of accumulation begins.

d. 40 CFR 262.34(a)(3), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without interim status, provided that while being accumulated on-site, each container and tank is labeled or marked clearly with the words, "Hazardous Waste". The USMCB failed to label containers of electrolyte solution with the words "Hazardous Waste".

e. 40 CFR 262.34(a)(4), codified at 10 NCAC 10F .0030, states that a generator may accumulate hazardous waste on-site for 90 days or less without a permit or without interim status provided that: the generator complies with the requirements for owner or operators in Subparts C and D part 265 and with Section 265.16.

i. 40 CFR 265.31, codified at 10 NCAC 10F .0033, states that facilities must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents. The USMCB failed to minimize the possibility of a release by placing batteries upside down on pallets on the ground. Visual discoloration is noted around Building 909.

ii. 40 CFR 265, Subpart D (265.50-265.56), codified at 10 NCAC 10F .0033, states that each owner or operator (each generator site) must have a contingency plan designed to minimize the hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents. The USMCB failed to develop contingency plans for each generating site, including TMO, which signs as a generator, manifests to Safety-Kleen.

iii. 40 CFR 265.16, codified at 10 NCAC 10F .0033, states that facility personnel must successfully complete a program of classroom instruction or on-the-job training; facility personnel must take part in an annual review of the initial training; and must maintain documents and records describing job titles, job descriptions, written descriptions and amount of training, and documentation of completion. The USMCB has failed to implement and maintain personnel training plans at all generating sites. Numerous personnel were not trained at all generating sites including TMO which signs as a generator, manifests to Safety-Kleen.

f. 40 CFR 262.42(a), codified at 10 NCAC 10F .0030, states that a generator who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted, by the initial transporter, must contact the transporter and/or the owner or operator of the designated facility to determine the status of the waste. The USMCB has failed to receive a signed copy of manifested shipments to Safety-Kleen nor has any contact been made to determine the status of such shipments.

g. 40 CFR 262.42(b), codified at 10 NCAC 10F .0030, states that a generator must submit an Exception Report if he has not received a signed copy of the manifest from the owner or operator of the designated facility within 45 days of acceptance of that waste by the initial transporter. The USMCB has failed to submit Exception Reports for all shipments to Safety-Kleen where the USMCB has not received a signed copy from Safety-Kleen.

h. 40 CFR 264.16(d)(e), codified at 10 NCAC 10F .0032, states that job titles, job descriptions, written description of and amount of training, and documentation of a completion must be maintained. The USMCB has failed to revise the personnel training plan to document all individuals involved in the hazardous waste management program.

PERMIT MODIFICATIONS - CONDITIONS

i. 40 CFR 264.52(e), codified at 10 NCAC 10F .0032, states that the contingency plan must include a list of all emergency equipment at the facility. The list must be kept up-to-date. In addition, the plan must include the location and a physical description of each item, and a brief outline of its capabilities. The USMCB has failed to adequately list, and describe the emergency equipment. Revision's to the contingency plan is considered a modification of the existing permit.

j. 40 CFR 264.52(f), codified at 10 NCAC 10F .0032, states that the contingency plan must include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. The USMCB has failed to include a detailed evacuation plan in the event of an emergency.

k. 40 CFR 264.56(d)(e)(h)(i)(j), codified at 10 NCAC 10F .0032, states that the contingency plan must outline procedures that the emergency coordinator is responsible for in reporting to the appropriate authorities, containment of hazardous waste incidents, adequacy of remedial activities, and incident documentation. The USMCB has failed to describe in detail, emergency procedures in the event of an emergency.

l. 40 CFR 264.173(b), codified at 10 NCAC 10F, states that containers holding hazardous waste must not be handled or stored in a manner which may rupture the container. Part III of the permit addresses storage in containers, and requires that containers cannot be stacked more than two high. The USMCB has failed to comply with the permit conditions by stacking crates higher than the two drum limit.

m. 40 CFR 270.42, codified at 10 NCAC 10F .0034, states that under certain conditions, the permit may be modified to make corrections or allowances for changes in the permitted activity. The USMCB has failed to notify the State that the operator of the facility has changed names from DPDO to DRMO. In addition, the USMCB is now utilizing an inspection form that has replaced the form noted in the permit. The USMCB has failed to change this form in the permit.

9. An informal meeting/prehearing conference was held on September 9, 1986, at which time the parties agreed in principle to the entering of this Consent ~~Order~~ Agreement

10. This Consent ~~Order~~ Agreement is not intended and shall not be construed as an admission of fact or applicability of any law by the USMCB. The USMCB admits no liability regarding the allegations of noncompliance contained in the inspection and further, no finding is made as to the truth of said allegations.

11. Nothing in this Consent ~~Order~~ Agreement shall be construed as limiting the State of North Carolina from performing its duty to protect the public health and environment of the State as required by law.

12. This Consent ~~Order~~ Agreement shall be binding upon the officers, directors, agents, employees, contractors, successors and assigns of the USMCB facility. The USMCB shall provide a copy of this Consent Order to each contractor or other person performing any work under this Consent ~~Order~~ Agreement and shall condition each contract or agreement for such work upon these Consent ~~Order~~ Agreement terms.

13. Failure to meet the obligations which this Consent ~~Order~~ Agreement imposes will expose the USMCB to ~~any and all of the various~~ enforcement sanctions applicable to and available to the Branch under the Act and rules, ~~including N.C.G.S. 130A-22.~~ The Branch places the USMCB on notice of its intention to use ~~appropriate one or more of those~~ sanctions should ~~the Company~~ USMCB fail to comply with this Consent ~~Order~~ agreement

15. This Consent ~~Order~~ Agreement will be signed on behalf of the USMCB by Colonel T.J. Dalzell, Assistant Chief of Staff, United States Marine Corps Base, Camp Lejeune, North Carolina, who warrants that he has the authority to enter this Consent Order on behalf of the USMCB.

ORDER

William L. Meyer has determined that this Consent ~~Order~~ Agreement is in the furtherance of the public interest and will protect the public health and environment, and, with the consent and cooperation of the USMCB, hereby ~~orders~~ Requires the following actions:

1. That within 30 days of the execution of this agreement, the USMCB shall provide for immediate compliance with Sections a,b,c,d,e(i),f,g,l, previously noted above within the ~~Stipulations~~ Statement of Fact and Law, to efficiently maintain a hazardous waste management program.

2. That within 90 days of the execution of this agreement the USMCB shall comply with sections e(ii),e(iii),h,i,j, and k noted above within the ~~Stipulations~~ Statement of Fact and Law, by establishing personnel training programs and contingency plans to satisfy the deficiencies cited. Draft revision as available should be submitted for review with the monthly status report.

3. That within 30 days of the execution of this agreement, the USMCB shall provide for the permit modifications noted in section (m) of the ~~Stipulations~~ statement of Fact and Law.

4. The USMCB shall maintain compliance with the Act and all other applicable rules while complying with this Consent ~~Order~~ agreement [redacted]

5. At least monthly, the United State Marine Corps Base shall inform the Branch, in writing, of the progress made toward meeting the requirements set forth in this Consent ~~Order~~ agreement. The reports shall be filed with the Branch on or before the 15th day of the month commencing November 15, 1986.

6. The Branch shall review all documents submitted and within 7 calendar days of receipt of such documents, the Branch shall notify the USMCB in writing of the Branch's approval or disapproval of these documents or any part thereof. In the event of any disapproval, the

14. Should USMCB fail to comply with this consent agreement, it shall have the burden of demonstrating that said noncompliance was [redacted] the result of any action or inaction of any authority over which it has no control. If the noncompliance with this agreement is due to factors outside the control of USMCB, it shall seek to comply herewith as soon as practicable. [redacted]

Branch shall specify in writing both the deficiencies and the reasons for such disapproval, and a schedule for completion of modifications or additions which must be made.

7. The Branch designates Mr. Jerry Rhodes, Assistant Branch Head, as primary contact for technical matters regarding implementation and compliance with this Consent ~~Order~~ Agreement. Other Branch staff may be used for inspections and other oversight activities as needed.

8. The USMCB designates Mr. Julian Wooten, as primary contact responsible for overseeing implementation and compliance with this Consent ~~Order~~ Agreement

9. To the maximum extent possible, communications between the USMCB and Branch and all documents, including reports, approvals, and correspondence concerning the activities performed pursuant to the terms and conditions of this Consent ~~Order~~ Agreement shall be directed through the Primary Contacts.

IN WITNESS WHEREOF, The parties have executed this Agreement, on this the _____ day of _____, 1986, by their duly authorized representatives.

Solid and Hazardous Waste Management Branch
Division of Health Services
Department of Human Resources of the State of N.C.

By: _____ _____
William L. Meyer, Head Date

By: _____ _____
Colonel T.J. Dalzell Date
Assistant Chief of Staff,
Facilities
United States Marine Corps
Base, Camp Lejeume, N.C.

5483A

jdw — Daniels

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

James G. Martin, Governor
Phillip J. Kirk, Jr., Secretary

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

October 27, 1986

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

Re: NC 6170022580

Dear Col. Dalzell:

I am writing to you with respect to Administrative Order on Consent, Docket # 00256, concerning the permit issued by the North Carolina Solid and Hazardous Waste Management Branch to the U.S. Marine Corps Base. An informal meeting was held today, October 27, 1986, with the Solid and Hazardous Waste Management Branch staff and your representatives.

As a consequence of the above mentioned meeting, I do not now request your signature on the Administrative Order on Consent, d[illegible] by October 30, 1986. Pursuant to the informal meeting, my office will consider future actions by the Solid and Hazardous Waste Branch and keep you apprised.

Sincerely,

Jerry Rhodes
Assistant Branch Head
Solid and Hazardous Waste Management Branch

JR/rt/Robin3

cc: J. Wooten
C.Schiller

HW8304

STATE OF NORTH CAROLINA
DIVISION OF HEALTH SERVICES
P.O. Box 2091
Raleigh, N.C. 27602-2091

RALEIGH
OCT 27'86
N.C.
699103
22

J. WOOTEN
DIRECTOR OF NATURAL RESOURCES
DIVISION
U.S. MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA 28542

18 68

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

ADMINISTRATIVE MESSAGE

ROUTINE

R 042300Z NOV 86 ZYB

FM CG MCB CAMP LEJEUNE NC

TO CG SECOND MARDIV
CG II MAF
CG SIXTH MAB
NAVDENCLINIC CAMP LEJEUNE NC
CG SECOND FSSG
HQ NUC II MAF
NAVHOSP CAMP LEJEUNE NC
MCB CAMP LEJEUNE NC

INFO MCAS NEW RIVER NC

UNCLAS //N06280//

SUBJ: HAZARDOUS MATERIAL DISPOSAL PROGRAM

A. CG MCB CAMP LEJEUNE NC 291625Z OCT 86
B. ON SITE HAZARDOUS WASTE (HW) INSPECTION BY EPA AND STATE DHS OF

26 JUNE 1986

C. BO 6240.5

1. REF A ADVISED ORGANIZATIONAL PERSONNEL THAT MCB ENVIRONMENTAL PERSONNEL WILL BEGIN COMPLIANCE INSPECTIONS OF ALL WORK SITES/-SHOPS WHERE HW ARE ROUTINELY GENERATED OR STORED. USED SOLVENTS, DEGREASERS, ELECTROLYTE, LITHIUM BATTERIES AND WASTE OIL WITH CER-TAIN REGULATED CONTAMINANTS ARE EXAMPLES OF ROUTINELY GENERATED HW. THE SUBJECT INSPECTIONS ARE BEING INITIATED IN RESPONSE TO REF B WHICH IDENTIFIED SERIOUS DISCREPANCIES REGARDING IMPLEMENTATION OF FEDERAL/STATE REGULATIONS OUTLINED IN REF C.

2. THE PURPOSE OF THIS MESSAGE IS TO ANNOUNCE THAT THERE WILL BE A

DLVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...ACT
DLVR:NAVHOSP CAMP LEJEUNE NC(4)...ACT
DLVR:HQ NUC II MAF(7)...ACT

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

G-4(1)...ACT FOR CG II MAF(3) /05/
CFU(1) S-S(1)

RTD:000-000/COPIES:0137

452268/308 1 OF 2 MATA1026 308/23:30Z 042300Z NOV 86
CSN:RXIA00124 CG MCB CAMP LE

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

REQUIRED ONE HOUR MEETING FOR ALL UNIT HAZARDOUS MATERIAL DISPOSAL COORDINATORS (HMDC) AND HAZARDOUS MATERIAL DISPOSAL OFFICERS (HMDO) AT BLDG 322, THE OLD STAFF NCO CLUB, SECOND DECK AT 0800 HOURS ON FRIDAY, 7 NOVEMBER 1986. THE MEETING IS DESIGNED TO PROVIDE ADVANCE INFORMATION IN PREPARATION OF THE MCB COMPLIANCE INSPECTIONS.

3. ALL PERSONNEL ASSOCIATED WITH THE SUBJECT PROGRAM NEED TO BE MADE AWARE THAT WE ARE IN A VERY TENUOUS POSITION AND MUST COME INTO COMPLIANCE WITH EPA AND STATE REGULATIONS PRIOR TO A REINSPECTION BY SAME IN DECEMBER 1986.

4. POC ON THIS MATTER IS MR. DANNY SHARPE, NREA, EXT. 2083/2195.

BT

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U U N C L A S S I F I E D U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

ADMINISTRATIVE MESSAGE

ROUTINE

R 042300Z NOV 86 ZYB

FM CG MCB CAMP LEJEUNE NC

TO CG SECOND MARDIV
CG II MAF
CG SIXTH MAB
NAVDENCLINIC CAMP LEJEUNE NC
CG SECOND FSSG
HQ NUC II MAF
NAVHOSP CAMP LEJEUNE NC
MCB CAMP LEJEUNE NC

INFO MCAS NEW RIVER NC

UNCLAS //N06280//

SUBJ: HAZARDOUS MATERIAL DISPOSAL PROGRAM

A. CG MCB CAMP LEJEUNE NC 291625Z OCT 86
B. ON SITE HAZARDOUS WASTE (HW) INSPECTION BY EPA AND STATE DHS OF

26 JUNE 1986

C. BO 6240.5

1. REF A ADVISED ORGANIZATIONAL PERSONNEL THAT MCB ENVIRONMENTAL PERSONNEL WILL BEGIN COMPLIANCE INSPECTIONS OF ALL WORK SITES/-SHOPS WHERE HW ARE ROUTINELY GENERATED OR STORED. USED SOLVENTS, DEGREASERS, ELECTROLYTE, LITHIUM BATTERIES AND WASTE OIL WITH CER-TAIN REGULATED CONTAMINANTS ARE EXAMPLES OF ROUTINELY GENERATED HW. THE SUBJECT INSPECTIONS ARE BEING INITIATED IN RESPONSE TO REF B WHICH IDENTIFIED SERIOUS DISCREPANCIES REGARDING IMPLEMENTATION OF FEDERAL/STATE REGULATIONS OUTLINED IN REF C.

2. THE PURPOSE OF THIS MESSAGE IS TO ANNOUNCE THAT THERE WILL BE A

DLVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...ACT
DLVR:NAVHOSP CAMP LEJEUNE NC(4)...ACT
DLVR:HQ NUC II MAF(7)...ACT

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

G-4(1)...ACT FOR CG II MAF(3) /05/
CFU(1) S-S(1)

RTD:000-000/COPIES:0137

452268/308 1 OF 2 MATA1026 308/23:30Z 042300Z NOV 86
CSN:RXIA00124 CG MCB CAMP LE

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U U N C L A S S I F I E D U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

REQUIRED ONE HOUR MEETING FOR ALL UNIT HAZARDOUS MATERIAL DISPOSAL COORDINATORS (HMDC) AND HAZARDOUS MATERIAL DISPOSAL OFFICERS (HMDO) AT BLDG 322, THE OLD STAFF NCO CLUB, SECOND DECK AT 0800 HOURS ON FRIDAY, 7 NOVEMBER 1986. THE MEETING IS DESIGNED TO PROVIDE ADVANCE INFORMATION IN PREPARATION OF THE MCB COMPLIANCE INSPECTIONS.

3. ALL PERSONNEL ASSOCIATED WITH THE SUBJECT PROGRAM NEED TO BE MADE AWARE THAT WE ARE IN A VERY TENUOUS POSITION AND MUST COME INTO COMPLIANCE WITH EPA AND STATE REGULATIONS PRIOR TO A REINSPECTION BY SAME IN DECEMBER 1986.

4. POC ON THIS MATTER IS MR. DANNY SHARPE, NREA, EXT. 2083/2195.

BT

6240
NREAD
3 Oct 86

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 (HW) MANAGEMENT PROGRAM

Ref: (a) BO 6204.5

Encl: (1) Supvy Ecologist Memo to Record dtd 2 Oct 86

1. The purpose of this memorandum is to formally report apparent violations of state and federal regulations outlined in the reference. The enclosure outlines mishandling of HW by personnel of the Infantry Training School (ITS). HW were apparently transported on a public highway by unauthorized personnel in a manner which as a minimum could have easily resulted in serious embrassment to the Commanding General. ITS personnel failed to follow specific procedures which are clearly spelled out in the reference.

2. Considering the current status of ongoing negotiations between this Command and the Division of Health Services, relative to the subject program, it is recommended that a well thought-out plan of investigation and followup be conducted of all apsects of the incident described in the enclosure. Close consultation between the Facilities Department and the SJA regarding planning and conducting of such investigations is recommended.

3. NREAD has consulted with LTCOL Wellington, SJA Office, relative to whether or not the incident described in the enclosure is reportable to outside regulatory agencies. It is NREAD's conclusion that the incident is not reportable. It should be noted that the incident is likely to come to regulatory agency personnel's attention during routine inspections. HW manifest records will document unauthorized transportation on public highway. It should also be noted that handling of this incident described in the enclosure will set an important precedent for handling future discrepancies within the subject program.

JULIAN I. WOOTEN

UNITED STATES MARINE CORPS
Natural Resources and Environmental Affairs Division
Marine Corps Base
Camp Lejeune, North Carolina 28542

IN REPLY REFER TO:
6240
NREAD
2 Oct 86

From: Supervisory Ecologist
To: MEMORANDUM FOR THE RECORD

Subj: HAZARDOUS WASTE (HW) MANAGEMENT

Ref: (a) BO 6240.5

Encl: (1) DD 1348-1, Document No. M930556273A922
(2) DD 1348-1, Document No. M930556273A921
(3) ITS Armory PP&P Document No. M930556273A921
(4) Excerpts from BO 6240.5

1. Purpose. To document information obtained by the Supervisory Ecologist regarding alledged violations of the reference by Infantry Training School (ITS) personnel during disposal of hazardous wastes (HW). The HW was used cleaning solvent described in enclosures (1) and (2).

2. The following were observed by the Supervisory Ecologist:

a. At or about 1430 hours on 1 Oct 1986, Mr. Joe Gonzales, Defense Reutilization and Marketing Office (DRMO), Receiving Section, Building 906, notified Supervisory Ecologist by phone that ITS personnel were at Building 906 attempting to turn-in HW.

b. Supervisory Ecologist and Biological Technician, Sammy Gwynn reported to Building 906 immediately.

c. A Dodge pickup (vehicle no. 271040) was observed which contained nine five-gallon "plastic" containers. The pickup also contained two yellow 55-gallon barrels, one approximately full and one approximately half full. All containers had HW labels.

d. A LCpl Anderson identified himself as the driver and that he was from ITS.

e. A Cpl Parr identified herself as the senior person present from ITS and the person in charge at the scene. She advised that she was acting on the orders of Sgt Martinez, ITS.

f. The pickup also contained weapons which appeared to be motars. One of the ITS personnel stood armed guard on the vehicle at all times until weapons were removed.

g. Close examination of the containers in cooperation with George Eggers, DRMO, revealed one five-gallon container with a crack on the top of the container and one five-gallon container with a cracked cap. Both damaged containers were full. Mr. Eggers indicated that upon correction of these two discrepancies, completion of proper paperwork and certification he would be able to take the containers. Mr. Eggers stated he was leaving for an appointment at the Naval Hospital and would not be able to accept the items until the next day, 2 Oct 86. He noted that the forms DD 1348-1 would have to be corrected and properly signed. The forms were not signed at that time. No HW manifest was available.

h. After consultation with PP&P personnel from nearby Bldg 915, Cpl Parr and LCpl Anderson, corrected the container related discrepancies. The cracked can was poured into the half full 55-gallon drum. The intact lid from the drained can was then used to replace the damaged lid on the second container. PP&P also advised Cpl Parr how to fill out a PP&P work request.

i. After consultation with Mrs. Hipp, DRMO, and Mr. Harold Norris, Traffic Management Office (TMO), the Supervisory Ecologist directed that the vehicle and HW be stored within the DRMO compund at TP-451. The Supervisory Ecologist assisted ITS personnel to arrange for transportation of themselves and their weapons back to ITS. Cpl Parr and the weapons were transported by a second vehicle from the Camp Geiger Area which happened to be at DRMO.

j. LCpl Anderson drove the pickup and HW to TP-451 escorted by Mr. Lonnie Brinson, DRMO, at approximately 1555 hours. Mr. Brinson was to secure the vehicle on the storage pad at TP-451 and close the outlet valve to the spill containment system. Supervisory Ecologist and Mr. Gwynn returned to NREAD. Mr. Manuel Martin, NREAD, stood by at Bldg 906.

k. LCpl Anderson was transported back to Bldg 906 by Mr. Brinson where he was to be picked up by a second vehicle dispatched by Warrant Officer Cote, HMDO, ITS. Mr. Martin returned to NREAD at approximately 1640 hours confirming that Mr. Brinson had returned LCpl Anderson to Bldg 906.

l. Mr. Martin, NREAD, checked vehicle # 271040 at Bldg TO-451 during morning of 2 Oct 1986 - No new problems had arisen.

3. On 2 Oct 1986, the Supervisory Ecologist, made or handled numerous phone calls with the following to arrange turn-in of the HW: WO-Cote, ITS (ext 0378); Harold Norris, TMO (ext 2541); George Eggers, DRMO (ext 1369/5613). Enclosures (1), (2) and (3) were prepared by ITS and processed by Supervisory Ecologist, PP&P, DRMO and TMO. The HW was unloaded at TP-451.

4. Other Comments. Based on observations discussed above, it is the Supervisory Ecologist's opinion that any spillage during the transportation of the two damaged HW containers from ITS to Bldg 906 was at most a few ounces. There was no evidence that spillage (if any) reached the ground or water. The HW was used cleaning solvent contaminated with grit, carbon and chemical referred to as breakfree. The HW classification is based on the ignitability of the stem. The EPA HW ID# is D001. Instead, NREAD observations did not reveal any reason for concern that the HW are anything other than claimed/described by ITS personnel. However, the Supervisory Chemist, NREAD, has been requested to further check out the identity of the HW.

5. On 5 Oct 1986, the Supervisory Ecologist reviewed with Cpl Parr prior comments she had made. She again stated her original instructions came from Sgt Martinez, ITS. She did add that Sgt Martinez gave her the original form DD 1348-1. She also added that she had checked with Sgt Mantilla at ITS Supply regarding the need for a signature on the documents. She stated that after being told by Sgt Mantilla that none was required, she and LCpl Anderson then transported the wastes from Bldg TC-816, Camp Geiger, to Bldg 906, Hadnot Point by way of Hwy 17 and 24 through Jacksonville. Cpl Parr was advised by me to enter a detailed account of the events in her log.

6. Summary of Violations. It is my opinion that as a minimum the following violations have ocurred:

a. Unmanifested shipment of HW on the public highway

b. Failure to properly containerize HW (DOT approved containers in suitable condition)

c. HW handling by untrained personnel

d. Failure to comply with procedural requirements of BO 6240.5 (See enclosure (4)).

Items 6a, 6b and 6c would be violations of both Base Order 6240.5 and state and federal regulations and statutes.

Danny D. Sharpe

DANNY D. SHARPE

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80

DOC. IDENT.	RI FROM	M&S	STOCK NUMBER: FSC	STOCK NUMBER: NIIN	ADD	UNIT OF ISSUE	QUANTITY	DOCUMENT NUMBER: SERV	DOCUMENT NUMBER: REQUISITIONER	DOCUMENT NUMBER: DATE	DOCUMENT NUMBER: SERIAL	SUFFIX	SUPPLEMENTARY ADDRESS: SERV	SUPPLEMENTARY ADDRESS: SIGNAL	FUND	DISTRIBUTION	PROJECT	PRIORITY	REQ'D DEL DATE	ADVICE	RI	UNIT PRICE: DOLLARS	UNIT PRICE: CTS.
BWA			6850	002649037	SRP		CN 00008	M	930556273	A922									13		H	$10	25

SHIPPED FROM	SHIP TO	MARK FOR	PROJECT	TOTAL PRICE: DOLLARS	TOTAL PRICE: CTS.
ITS, MCB Camp Lejeune, NC 28542 (919) 451-0378 A	MCB Camp Lejeune, NC 28542 B	HW C	D	$82	00 E

WAREHOUSE LOCATION	TYPE OF CARGO	UNIT PACK	UNIT WEIGHT	UNIT CUBE	UFC	NMFC	FREIGHT RATE		DOCUMENT DATE	MAT. COND.	QUANTITY		
F	G	H	I	J	K	L	M	N	O	P	Q	R	S

SUBSTITUTE DATA (ITEM ORIGINALLY REQUEST'D)	FREIGHT CLASSIFICATION NOMENCLATURE	
T	U	V
W	ITEM NOMENCLATURE X Dry Cleaning Solvent (used contaminated with approx 20% carbon, sand and breakfree)	Y

SHIPPER'S USE	SELECTED BY AND DATE	TYPE OF CONTAINER(S)	TOTAL WEIGHT
	1	2	3
	PACKED BY AND DATE	NO. OF CONTAINER(S)	TOTAL CUBE
	4	5	6

RECEIVER'S USE	RECEIVED BY AND DATE	INSPECTED BY AND DATE
	7	8
	WAREHOUSED BY AND DATE	WAREHOUSE LOCATION
	9	10

REMARKS:		
AA	BB	CC

This is to certify that the above named Materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of DOT and EPA.
DD FF GG

FIRST DESTINATION ADDRESS	DATE SHIPPED	
11	12	

13 TRANSPORTATION CHARGEABLE TO	14 B/LADING, AWB, OR RECEIVER'S SIGNATURE (AND DATE)	15 RECEIVER'S DOCUMENT NUMBER

DD FORM 1348-1 1 MAR 74
S/N 0102-LF-013-1040
EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED
DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

1

To: PP&P
Please proceed with processing this document.
Danny Shaw
Base HMDO 20 Oct 86
Phone 5003

* U.S. GOVERNMENT PRINTING OFFICE: 1986-491-647/20034

(1) Enc (1)

DOC. IDENT.	RP-FROM	M&S	STOCK NUMBER: FSC	STOCK NUMBER: NIIN	STOCK NUMBER: ADD	UNIT OF ISSUE	QUANTITY	DOCUMENT NUMBER: SERV	DOCUMENT NUMBER: REQUISITIONER	DOCUMENT NUMBER: DATE	DOCUMENT NUMBER: SERIAL	SUFFIX SERV	SUPPLEMENTARY ADDRESS	SIGNAL	FUND	DISTRIBUTION	PROJECT	PRI-ORITY	REQ'D DEL DATE	ADVICE	RI	UNIT PRICE: DOLLARS	UNIT PRICE: CTS.
BWA			6850	002649037		DR	00002	M	93055	6273	A921				13	NA	H					$13	83

SHIPPED FROM (A)	SHIP TO (B)	MARK FOR (C)	PROJECT (D)	TOTAL PRICE: DOLLARS	TOTAL PRICE: CTS.
ITS, MCB Camp Lejeune, NC 28542 (919) 451-0378	MCB CampLejeune, NC 28542	HW		$27	66

WAREHOUSE LOCATION (F)	TYPE OF CARGO (G)	UNIT PACK (H)	UNIT WEIGHT (I)	UNIT CUBE (J)	UFC (K)	NMFC (L)	FREIGHT RATE (M)	(N)	DOCUMENT DATE (O)	MAT. COND (P)	QUANTITY (Q)	(R)	(S)

SUBSTITUTE DATA (ITEM ORIGINALLY REQUEST'D) (T)	FREIGHT CLASSIFICATION NOMENCLATURE (U)	(V)
1690		

(W)	ITEM NOMENCLATURE (X)	
	Dry cleaning solvent (used contaminated with approx 20% carbon, sand and breakfree)	

SHIPPERS USE	SELECTED BY AND DATE (1)	TYPE OF CONTAINER(S) (2)	TOTAL WEIGHT (3)	RECEIVERS USE	RECEIVED BY AND DATE (7)	INSPECTED BY AND DATE (8)
	PACKED BY AND DATE (4)	**NO. OF CONTAINER(S) (5)**	**TOTAL CUBE (6)**		**WAREHOUSED BY AND DATE (9)**	**WAREHOUSE LOCATION (10)**

REMARKS: AA	BB	CC

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of DOT and EPA. (DD, EE)

FIRST DESTINATION ADDRESS (11)	DATE SHIPPED (12)	FF	GG

13 TRANSPORTATION CHARGEABLE TO	14 B/LADING, AWB, OR RECEIVER'S SIGNATURE (AND DATE)	15 RECEIVER'S DOCUMENT NUMBER

DD FORM 1348-1 1 MAR 74 EDITION OF 1 JAN 64 MAY BE USED UNTIL EXHAUSTED

S/N 0102-LF-013-1040

DOD SINGLE LINE ITEM RELEASE/RECEIPT DOCUMENT

1

* U.S. GOVERNMENT PRINTING OFFICE: 1986-491-647/20034

H2O

To: PP&P
Please Proceed with Processing. This document
Danny Howard BASE HAZMAT DOC 86 Phone 5003

Encl (2)

To: AP&P
Please proceed with
This Request
20Oct86 Danny Sharpe 5003
Phoned Base H.M.OC

PACKAGING AND PRESERVATION WORK REQUEST
MCBCL 4030 (REV 3-70)

TO: PRESERVATION, PACKAGING AND PACKING BRANCH, MOWASP DIV., BMATBN, MCB, CLNC

FROM (UNIT)	DATE	UNIT PRIORITY DESIGNATOR
ITS ARMORY, MCB, Camp Lejeune, NC 28542	6274	
PERSON FAMILIAR WITH WORK REQUESTED	**PHONE**	**BLDG NO.**
WO F.L. Cote	451-0378	TC-816

FOLLOWING WORK IS REQUESTED
Request classification of hazardous waste.

TYPE WORK REQUESTED (X)	
(*)PACKAGE AND PRESERVE ☐ LEVEL ☐ A ☐ B ☐ C	(*)PACK ☐ LEVEL ☐ A ☐ B ☐ C
CONSTRUCT BOXES ☐ CRATES ☐	PAINT AND MARK ☐ TACTICAL MARK ☐ YES ☐ NO

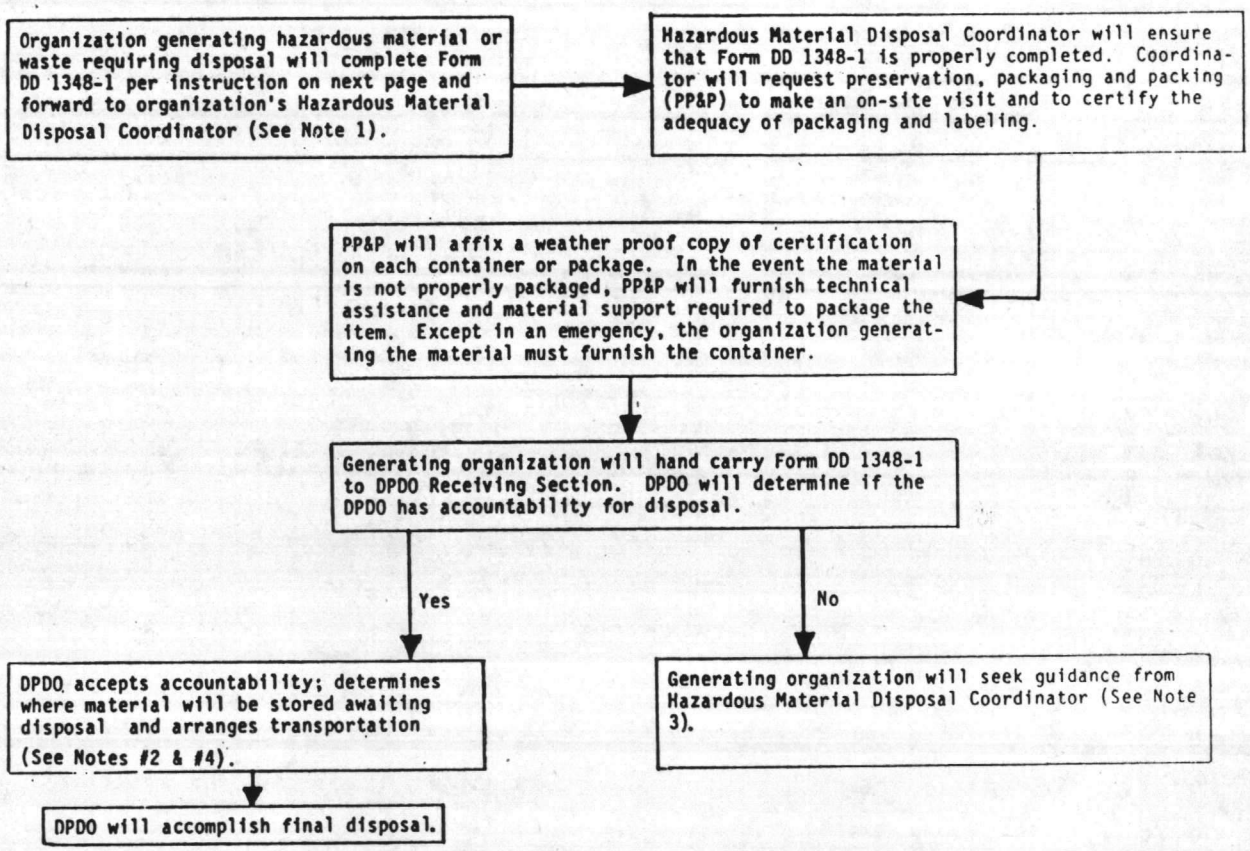
DETAILS (LIST INSIDE DIMENSIONS IF CONSTRUCTION IS DESIRED; COLOR OF PAINT, PATTERN AND NUMBER OF TACTICAL MARK, ANY SPECIAL INSTRUCTIONS)

DEAD LINE DELIVERY DATE	WR NO.	SIGNATURE

Spaces On and Below This Line For P&P Use Only	JON CHARGEABLE	P&P CONTROL NO.

WORK MEASUREMENT INFO PROJ 12				WORK MEASUREMENT INFO PROJ 11 & 94 TOTALS (LESS PROJ 12)			
NO. OF ITEMS	TONS	NO. OF PKGS		CUBE	WEIGHT	VEHICLES	BOXES BUILT
						ENCL	(3)

HAZARDOUS MATERIAL DISPOSAL PROCEDURES



Note 1: Organization having physical custody of material awaiting disposal will conduct weekly inspections in accordance with paragraph 4(a)(5) of this Order, if the item is hazardous waste.

Note 2: If an item to be transported is a hazardous waste subject to RCRA, the Traffic Management Officer will transport. A North Carolina Hazardous Waste Shipping Manifest prepared prior to transporting, will be attached to DD-1348-1 and will be carried by driver of vehicle used to transport waste.

Note 3: These items will be disposed of on a case by case basis utilizing procedures developed in accordance with applicable regulations. Assistant Chief of Staff, Facilities, Marine Corps Base, will coordinate development of appropriate procedures.

Note 4: The material will not be moved without prior concurrence of DPDO unless required by an emergency, in which case, DPDO will be informed as soon as possible.

6240
MANP
2 Oct 86

MEMORANDUM

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

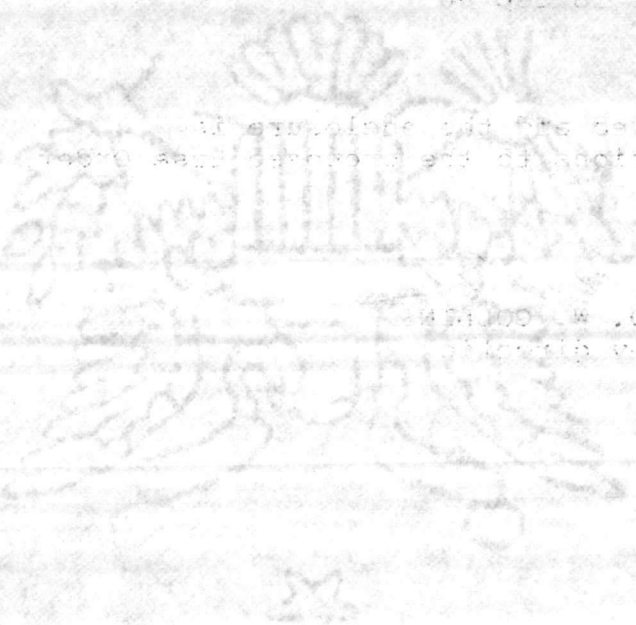
Subj: CHANGES TO BASE HAZARDOUS MATERIAL DISPOSAL PROGRAM

Ref: (a) Your ltr 6240 NREAD of 15 Sep 86

Encl: (1) CPO Memo of 30 Sep 86

1. The reference has been reviewed and the enclosure is submitted as comments/recommendations to the proposed Base Order 6240.5A.

D. W. COLLINS
By direction



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

DEPARTMENT OF THE NAVY

Memorandum

DATE: 30 Sep 86

FROM: Civilian Personnel Officer, Marine Corps Base, Camp Lejeune

TO: Assistant Chief of Staff, Manpower, Marine Corps Base, Camp Lejeune

SUBJ: HAZARDOUS MATERIAL DISPOSAL PROGRAM

AC/S Manpower memo of 17 sep 86

1. The following comments/recommendations are submitted in accordance with the reference.

a. Enclosure (2);

-Paragraph 1.b.

(6) Delete: "and provide to the Base Civilian Personnel Division (CPD)".

add: (7) Coordinate required HW training for civil service personnel with Base Civilian Personnel Division (CPD).

Rationale: This segment of the instruction is too broad in its scope. It implies the CPD will be responsible for all HW training of military as well as civilian personnel. The CPD is not responsible for military training.

-Paragraph 1.d.

(4) add: (g) Submit a record of civilian personnel HW training incidences to CPD for inclusion in the official personnel folder.

Rationale: There is no provision for documenting civilian training as required by BO 12410.3H.

Add: (5) Develop and implement a comprehensive HW personnel training plan meeting the requirements of reference (b) and related State of North Carolina regulations.

Rationale: The Director NREA Division is the position most cognizant of the entire HW Program; from the exact locations of HQ generators, through transport and storage, to the final disposal. Thus, the level of training required by each position and by the person filling that position can best be determined by the NREA.

-Paragraph 1.i.

(1) Delete entire subparagraph and renumber subparagraph (2) as (1).

Rationale: Supervisors, military and civilian, are responsible for determining and making known the training needs for subordinates. The AC/S, Manpower is responsible for coordinating and providing funded civilian training.

b. Enclosure (3):

- Paragraph 4: change "Manpower" to "Facilities".

Rationale: This paragraph shifts the responsibility of providing HW training from AC/S Facilities to AC/S, Manpower. While AC/S, Manpower is tasked to provide informational and technical support in enclosure (2), 1.i.(2), it is felt the responsibility for identifying and providing the actual training lies with AC/S, Facilities.

Unnumbered paragraph below 4.d.

Change the last sentence of the paragraph to read: HMDC will coordinate the scheduling and funding of specialized HW training with the appropriate training support activity.

Rationale: The last sentence of the paragraph appears to task the AC/S, Manpower with the actual scheduling and funding of HW training.

-Paragraph 5:

Add: e. Copies of HW training records for civilian employees will be forwarded to the Civilian Personnel Division for inclusion in the official personnel folder. The record will contain the following information: Name, social security number, beginning and ending dates of training, title or type of training and number of hours of training.

Rationale: To provide for the documentation of civilian training incidences as required by BO 12410.3H.

Respectfully,

HOSEA HORNE, JR.

6240
NREAD
1 Oct 86

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

Subj: PERFORMANACE ORIENTED PACKAGING FOR HAZARDOUS MATERIAL

Encl: (1) CMC ltr 4030 LMM-2/8009 of 11 Sep 86 (w/encls (1) and (2))

1. The enclosure is provided for information and appropriate action.

JULIAN I. WOOTEN

Distribution:

AC/S LOG
DRMO
BSAFETY
PP&P 2DFSSG
TMO
HMDC-MCB
HMDC-2DFSSG
HMDC-2DMARDIV
HMDC-HOSP
HMDC-DENTAL
HMDC-MCAS, NR

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

IN REPLY REFER TO
4030
LMM-2/8009
11 SEP 1986

From: Commandant of the Marine Corps

Subj: PERFORMANCE ORIENTED PACKAGING FOR HAZARDOUS MATERIALS

Encl: (1) Dep Asst SecDef (L&MM) memo LM/SD of 2 Jun 86
(2) DoD Working Group on Performance Oriented Packaging for Hazardous Materials - Terms and Definitions

1. In April 1985, the Department of Defense (DoD) Joint Packaging Coordinating Group established a working group to identify and recommend solutions to problems that DoD will encounter in implementing performance oriented packaging for hazardous materials. Performance oriented packaging is based on the ability of packaging to perform to a specific level of integrity when subjected to performance tests. Currently, the guiding document for U.S. shippers is entitled, "Recommendations of the Committee of Experts on the Transport of Dangerous Goods," by the United Nations. The recommendations eventually will be incorporated into current regulations governing transport of hazardous materials by air, water, road, and rail.

2. Enclosures (1) and (2) are provided to ensure that planners and decision makers responsible for the preparation and certification of hazardous materials are aware of current and pending action regarding this sensitive/critical subject.

3. Point of contact at this Headquarters is Mr. Donald B. Danner, LMM-2, AUTOVON 224-1600/1795.

Jan B. Olson

JAN B. OLSON
By direction

Distribution List

Commanding General
Fleet Marine Force, Atlantic
Norfolk, Virginia 23414-5001

Commanding General
Fleet Marine Force, Pacific
Camp H. M. Smith, Hawaii 96861-5001

Commanding General
Second Marine Aircraft Wing
Fleet Marine Force, Atlantic
Marine Corps Air Station
Cherry Point, North Carolina 28533-6001

ENCLOSURE (1)

RECEIVED
16 SEP 1986

Distribution List (Con't)

Commanding General
Marine Corps Logistics Base
Albany, Georgia 31704-5000

Commanding General
Third Marine Aircraft Wing
Fleet Marine Force, Pacific
Marine Corps Air Station El Toro
Santa Ana, California 29709-6001

Commanding General
Second Force Service Support Group
Camp Lejeune, North Carolina 28542-5001

Commanding General
Marine Corps Air Station, El Toro
Santa Ana, California 92709-6001

Commanding General
First Marine Aircraft Wing
Fleet Marine Force, Pacific
FPO San Francisco, California 96603-8700

Commanding General
Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

Commanding General
Marine Corps Base
Camp Pendleton, California 92055-5000

Commanding General
Marine Corps Base
Camp S. D. Butler
FPO Seattle, Washington 98773-5000

Commanding General
Third Force Service Support Group
FPO San Francisco 96604-8801

Commanding General
Marine Corps Logistics Base
Barstow, California 92311-5014

Commanding General
First Force Service Support Group
Camp Pendleton, California 92055-5700

THE OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

WASHINGTON, D.C. 20301-8000

ACQUISITION AND LOGISTICS

2 June 1986

LM/SD

MEMORANDUM FOR THE ASSISTANT SECRETARY OF THE ARMY (I&L)
ASSISTANT SECRETARY OF THE NAVY (S&L)
ASSISTANT SECRETARY OF THE AIR FORCE (RD&L)
DIRECTOR OF THE DEFENSE LOGISTICS AGENCY

SUBJECT: Performance Packaging of Hazardous Materials

Effective January 1, 1990 the shipment of DoD hazardous materials must be in compliance with the following revised regulations governing the international transport of dangerous goods: (1) the United Nations (UN) "orange book" entitled, "Transport of Dangerous Goods" containing "Recommendations of the Committee of Experts on the Transport of Dangerous Goods," 3rd edition; (2) the "International Civil Air Organization (ICAO) Technical Instructions for the Safe Transport of Dangerous Goods by Air" (1985 edition); and (3) the "International Maritime Dangerous Goods Code" (IMDG Code) published in five volumes, with amendments.

In essence, hazardous material packagings must be tested and certified against peformance standards contained in the regulations cited above. This differs from current regulations which require packagings to conform to specific design standards. The Department of Transportation (DoT) efforts on our behalf to obtain "grandfathering" provisions on current packaged inventories have been unsuccessful. Thus individual exemptions may be required from the competent authority of each country in which our DoD hazardous materials are transported.

Complicating the issue is the requirement to package hazardous material for domestic shipment in accordance with design specifications contained in the Code of Federal Regulations (CFR), Title 49. Though the DoT is attempting to bring domestic regulations in line with the new international requirements, we anticipate this to be a long-term effort. We, therefore, request that the Military Traffic Management Command (MTMC) seek CFR 49 exemption when DoD hazardous materials are packaged and marked to the international standards. We also request that MTMC identify those competent authorities of other nations where an exemption to the UN requirements is required to ship existing packaged inventories. This is important particularly to the shipment of ammunition stockpiles.

Encl (1)

We view two possible approaches to assuring DoD compliance with the performance packaging requirements:

a. Those DoD activities which develop packaging designs will conduct the necessary tests in accordance with the new standards and will specify proof of compliance markings on such packagings. These activities will certify their own design packagings and maintain a permanent record of all such certifications or equivalent tests used as provided for in the "orange book." Packagings so certified will bear a DoD logo and certification number.

b. Agencies procuring hazardous materials from suppliers using commercial packaging will require the commercial suppliers to have their packagings certified by an independent DoT certified testing laboratory unless the manufacturer has registered with and received approval from DOT to conduct self certification tests. Packagings so certified will be marked with the testing activities approved logo and certification number.

A joint Service/Defense Logistics Agency and MTMC working group, chaired by the Army Packaging, Storage and Containerization Center, is currently considering this performance oriented packaging issue under the auspices of the Joint Packaging Coordinating Group. We believe it is important that this group develop as soon as possible a packaging test plan, the mechanics whereby certified packagings are known to all users, appropriate changes to military standards and specifications, and problem areas that must be resolved with DoT. We request that the Army provide quarterly reports of this Group's progress.

Maurice N. Shriber
Deputy Assistant Secretary of Defense
(Logistics and Materiel Management)

DOD Working Group on Performance Oriented Packaging for Hazardous Materials

Terms and Definitions

Bags* - flexible packagings made of paper, plastics film, textiles, woven material, or other suitable materials.

Boxes* - packagings with complete rectangular or polygonal faces, made of metal, wood, plywood, reconstituted wood, fiberboard, plastics, or other suitable material.

Certification - the act of confirming that a completed package, marking inclusive, meets the requirements of UN Performance Oriented Packaging.

Certifier - one who physically recognizes the correctness of a package construction or has access to test data for that package and who then verifies in writing that it will perform to the level required. A certifier may perform one or more of the following acts of certification:

(1) Designs a package, and documents the design as meeting performance requirements.

(2) Performs a packaging operation in compliance with instructions prepared by a package designer.

(3) Determines that the packaging and/or container has been manufactured, assembled, and marked in accordance with requirements.

Closures* - devices which close an opening in a receptacle.

Combination packagings* - combination of packagings for transport purposes, consisting of one or more inner packagings secured in an outer packaging.

*United Nations definitions from the "Orange Book."

REPRODUCED AT GOVERNMENT EXP

Encl(2)

Competent authority	- a national agency responsible under its national law for the control or regulation of a particular aspect of the transportation of hazardous materials. The Associate Director, Office of Hazardous Materials Transportation, Research and Special Programs Administration, U.S. Department of Transportation, is the United States Competent Authority.
Composite packagings*	- packagings consisting of an outer packaging and an inner receptacle so constructed that the inner receptacle and the outer packaging form an integral packaging. Once assembled it remains thereafter an integrated single unit; it is filled, stored, transported, and emptied as such.
Crates*	- are outer packagings with incomplete surfaces.
Drums*	- flat ended or convex ended cylindrical packagings made of metal, fiberboard, plastics, plywood, or other suitable materials. This definition also includes packagings of other shapes made of metal or plastics, e.g., round taper-necked packagings or pail-shaped packagings. Wooden barrels or jerricans are not covered by this definition.
European agreement concerning the International Carriage of Dangerous Goods by Road (ADR)	- document which outlines the regulations for transport of dangerous goods by public road within the signatory European nations.
European regulations for the Safe Transport of Dangerous Goods by Rail (RID)	- document which outlines the regulations for transport of dangerous goods by rail within the signatory European nations.
Hazardous Material (DOT definition)	- a substance or material which has been determined by the Secretary of Transportation to be capable of posing an unreasonable risk to health, safety, and property when transported in commerce, and which has been so designated.

*United Nations definitions from the "Orange Book."

Hazardous Materials Transportation Act (HMTA)	-	governs the commercial shipment of such materials by the Department of Defense; establishes broad authority under which the Department of Transportation regulates the transportation/safety of all hazardous materials in commerce.
HM Docket 181	-	U.S. Department of Transportation proposal to adopt the UN recommendations for the transport of hazardous material.
Inner packagings*	-	packagings for which an outer packaging is required for transport.
Inner receptacles*	-	receptacles which require an outer packaging in order to perform their containment function.
International Civil Aviation Organization (ICAO)	-	group which sets the standards for international transport of dangerous goods by air.
ICAO Dangerous Goods Panel (DGP)	-	body of experts who maintain and prepare the technical instructions which outline the requirements for transport of dangerous goods internationally by air.
International Maritime Organization (IMO)	-	group which sets the standards for international transport of dangerous goods by vessel.
International Maritime Dangerous Goods (IMDG) Code	-	regulatory document which implements the requirements of the IMO.
Jerricans*	-	metal or plastics packagings of rectangular or polygonal cross-section.
Joint Army-Navy-Nasa-Air Force (JANNAF) Interagency Propulsion Committee	-	interagency committee which interfaces with the POP joint working group.

*United Nations definitions from the "Orange Book."

REPRODUCED AT GOVERNMENT EXP

Joint Conventional Ammunition Program (JCAP) Group	-	DOD interagency packaging group established to coordinate ammunition packaging programs and activities including design, development, engineering, standardization, standards and specifications, waivers and deviations, marking, color coding and associated data, and information exchanges; also Joint Ordnance Commanders' Packaging Group.
Maximum capacity*	-	maximum inner volume of receptacles or packagings expressed in litres.
Maximum net mass*	-	maximum net mass of contents in a single packaging or maximum combined mass of inner packagings and the contents thereof and is expressed in kg.
"Orange Book"	-	entitled, "Transport of Dangerous Goods," encompasses the recommendations of the UN Committee of Experts on the transport of dangerous goods.
Outer packaging*	-	outer protection of a composite or combination packaging together with any absorbent materials, cushioning, and any other components necessary to contain and protect inner receptacles or inner packagings.
Outside container (DOT definition)	-	the outermost enclosure used in transporting a hazardous material other than a freight container.
Package or outside package (DOT definition)	-	a packaging (see DOT definition) plus its contents.
Packages*	-	complete product of the packing operation, consisting of the packaging and its contents prepared for transport.
Packaging (DOD definition)	-	the methods and materials used to protect materiel from deterioration or damage; this includes cleaning, drying, preserving, packing, marking, and unitization.

*United Nations definitions from the "Orange Book."

REPRODUCED AT GOVERNMENT EXPENSE

Packaging (DOT definition)	-	the assembly of one or more containers and any other components necessary to assure compliance with the minimum packaging requirements and includes containers (other than freight containers or overpacks), portable tanks, cargo tanks, tank cars, and multi-unit tank car tanks.
Packagings*	-	receptacles and any other components or materials necessary for the receptacle to perform its containment function.
Performance Oriented Packaging (POP)	-	type of packaging based on the ability of packaging to perform to a specified level of integrity when subjected to performance tests.
Receptacles*	-	containment vessels for receiving and holding substances or articles, including any means of closing.
Self-certifier	-	organization or person who acts as a certifier in his own packaging regard, approved by the competent authority.
Transitional packaging	-	packages recognized as permissible prior to an effective date of a requirement which may continue to be legally used until an established expiration date.
UN Committee of Experts on the Transport of Dangerous Goods	-	panel responsible for the development of recommendations dealing with the multimodal transport of dangerous goods.
Wooden barrels*	-	packagings made of natural wood, of round cross-section, having convex walls, consisting of staves and heads fitted with hoops.

*United Nations definitions from the "Orange Book."

REPRODUCED AT GOVERNMENT EX

6240
NREAD
10 NOV 1986

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Distribution List

Subj: HAZARDOUS WASTE (HW) SPILL CONTINGENCY PLAN

Ref: (a) BO 6240.5
(b) BO 11090.1B

Encl: (1) Format for HW Spill and Related Emergency Contingency Plan

1. The current edition of reference (a), requires that copies of reference (b) be readily available at each site where HW are routinely generated and handled. The purpose of this requirement is to provide a spill contingency plan for handling HW spill related emergencies. During recent inspections by the Environmental Protection Agency (EPA), and North Carolina Division of Health Services (DHS), Camp Lejeune was cited for failure to have adequate spill contingency plans posted. Essentially, EPA and DHS officials determined that merely having reference (b) available was not sufficient to satisfy regulations outlined in reference (a).

2. There are approximately 150 sites aboard Camp Lejeune and MCAS, New River, which require the subject plans. Enclosure (1) has been prepared to illustrate the types of additional information required. Supervisors have primary responsibility for ensuring the safety of personnel and facilities within their cognizance. The most difficult task in preparing the subject plans is determining what actions that shop personnel are required to take between the time a spill is reported and the time the Fire Department arrives on the scene. Experience shows that with proper equipment, timely spill containment action by shop personnel can significantly reduce the damage/cost of a spill. OIC's are cautioned that care should be taken to ensure that the plans do not require personnel to take any action for which they are not equipped and trained to perform safely.

3. Addressees are requested to take immediate action required to update and improve the subject plan at all facilities where HW are routinely generated and handled. By 1 December 1986, a spill contingency plan will be posted at all sites. The plans will follow the basic format outlined in the enclosure. Hopefully, the initial posting of plans per this request will satisfy EPA and DHS expectations. Regardless, Base environmental, safety and fire protection personnel will continuously work with OIC's in upgrading these plans. A copy of each plan will be forwarded to the Assistant Chief of Staff, Facilities for information.

10 NOV 1986

6240
NREAD

Subj: HAZARDOUS WASTE (HW) SPILL CONTINGENCY PLAN

The copy should be routed via the chain of command. Requests for assistance from Base technical staff, should be routed through and coordinated by the cognizant Hazardous Material Disposal Coordinator for each major command. Point of contact with this matter is Mr. Danny Sharpe, Natural Resources and Environmental Affairs Division, extension 2083/1690.

T. J. DALZELL
By direction

DISTRIBUTION:
CG, II Marine Amp Force
CG, 2dMARDIV, FMF
CG, 2dFSSG(Rein) FMF
CG, 6th MAB
CO, MCAS (New River)
CO, Naval Hosp
CO, Dental
DRMO

FORMAT FOR
HAZARDOUS WASTE SPILL AND RELATED EMERGENCY
CONTINGENCY PLAN

ENCLOSURE (1)

HAZARDOUS WASTE SPILL AND RELATED EMERGENCY
CONTINGENCY PLAN FOR

_____ _____
(NAME OF FACILITY) BLDG. #

A. IN THE EVENT THAT A HAZARDOUS MATERIAL/HAZARDOUS WASTE SPILL, FIRE, RELEASE OF TOXIC FUMES OR SIMILAR EMERGENCY OCCURS, THE FOLLOWING ACTION WILL BE TAKEN:

-- FIRST, IMMEDIATELY ALERT EMPLOYEES/PERSONS IN THE IMMEDIATE AREA OF THE EMERGENCY AND BEGIN EVACUATION OF ANY PERSONS SUBJECT TO INJURY BY THE EMERGENCY. EVACUEES SHALL ASSEMBLE AT _____.

-- IMMEDIATELY, NOTIFY THE BASE FIRE DEPARTMENT, EXTENSION 3333. PROVIDE THE FIRE DEPARTMENT DISPATCHER WITH THE BEST ESTIMATE/AVAILABLE KNOWLEDGE OF THE AMOUNT AND TYPE OF HAZARDOUS SUBSTANCE SPILLED; LOCATION OF THE EMERGENCY; WHETHER OR NOT ANY PERSONS HAVE BEEN OR ARE LIKELY TO BE INJURED AND ANY OTHER INFORMATION HELPFUL TO EMERGENCY RESPONSE PERSONNEL. STAY ON THE LINE WITH THE DISPATCHER AND FOLLOW DISPATCHER'S INSTRUCTIONS IF YOU CAN SAFELY DO SO. CONTINUE TO ADVISE DISPATCHER OF CHANGING CIRCUMSTANCES.

-- ASSIGN ONE PERSON TO MEET THE EMERGENCY VEHICLE AND GUIDE FIRE DEPARTMENT PERSONNEL TO SPILL/EMERGENCY SITE.

-- BEGIN ASSEMBLING EMERGENCY SUPPLIES AND EQUIPMENT AVAILABLE AT THE WORK SITE. A LIST OF THESE ITEMS, THEIR LOCATION AND PERSONS RESPONSIBLE FOR PROVIDING THEM ARE CONTAINED IN ATTACHMENT (A).

-- IF THE CIRCUMSTANCES OF THE EMERGENCY PERMIT, BEGIN CONTAINMENT OF THE SPILL BY SHUTTING OFF VALVES, CONSTRUCTION OF EARTHEN DIKES AND APPLICATION OF ABSORBENT. ONLY PERSONNEL TRAINED AND AUTHORIZED BY THE OIC SHALL BE ALLOWED TO ENTER THE IMMEDIATE AREA OF THE SPILL. SECTION D PROVIDES A LIST OF PERSONNEL AUTHORIZED TO ENTER THE AREA AND ACTIONS THEY ARE EXPECTED TO TAKE. UPON ARRIVAL AT THE SCENE, THE FIRE DEPARTMENT WILL CONTROL ACCESS TO SITE.

-- UNDER NO CIRCUMSTANCES SHALL PERSONNEL UNDERTAKE ANY ACTION WHICH WOULD EXPOSE THEM TO TOXIC CHEMICALS, FUMES AND GASES UNLESS THE PROPER TYPE(S) OF WELL MAINTAINED PERSONNEL PROTECTIVE EQUIPMENT IS USED.

B. THE LATEST REVISION OF THE BASE SPILL CONTINGENCY ORDER, BO 11090.1_, IS PROVIDED AS ATTACHMENT (B). THE SENIOR FIRE DEPARTMENT OFFICIAL ON SCENE WILL SERVE AS THE NAVY ON-SCENE-COMMANDER. ALL MARINE CORPS, NAVY AND CIVILIAN PERSONNEL ON THE SCENE ARE EXPECTED TO PROVIDE AVAILABLE RESOURCES AS THE ON-SCENE-COMMANDER DEEMS NECESSARY TO ABATE THE EMERGENCY AND PROTECT LIFE AND PROPERTY.

C. OTHER OFFICIALS TO BE NOTIFIED:

-- OIC REPRESENTATIVE _____ (name/rank/title) _____ (phone #)

-- HAZARDOUS MATERIAL DISPOSAL OFFICER _____ (name/rank) _____ (phone #)

D. ROSTER OF SHOP PERSONNEL AUTHORIZED AND TRAINED TO RESPOND TO HAZARDOUS MATERIAL AND WASTE SPILLS/EMERGENCIES:

NAME/RANK/TITLE OF INDIVIDUAL	HAZARDOUS MATERIAL/WASTE EMERGENCY RESPONSIBILITIES

I hereby certify that the above personnel are properly trained and authorized to carry out the specific responsibilities shown above. These individuals shall assist in handling hazardous material/waste spills and related emergencies to the extent that they can do so safely.

_____ (OIC REPRESENTATIVE) _____ (DATE)

ITEM DESCRIPITION/LOCATION/ NAME AND PHONE NO. OF PERSON RESPONSIBLE FOR MAINTAINING AND PROVIDING ITEM	TYPES OF HAZARDOUS MATERIAL AND WASTE TO BE USED ON

Inventory of available Hazardous Material/Waste Spill Response and Clean-up Equipment and Supplies

ATTACHMENT (A)

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

ROUTINE

R 291625Z OCT 86

FM CG MCB CAMP LEJEUNE NC

TO CG SECOND MARDIV
CG SECOND FSSG
HQ NUC II MAF
NAVDENCLINIC CAMP LEJEUNE NC
CG SIXTH MAB
CG II MAF
NAVHOSP CAMP LEJEUNE NC
MCB CAMP LEJEUNE NC

INFO MCAS NEW RIVER NC

UNCLAS //N06280//

SUBJ: HAZARDOUS MATERIAL DISPOSAL PROGRAM

A. BO 6240.5
B. ON-SITE HAZARDOUS WASTE (HW) INSPECTION BY EPA AND STATE DHS OF

26 JUN 86

1. REF (A) PROMULGATES THE RESPONSIBILITIES, PROCEDURES AND GUIDELINES FOR HAZARDOUS MATERIAL (HM) AND HW HANDLING, LABELING, PACKAGING, STORAGE AND TRANSPORTATION. COMPREHENSIVE FEDERAL LEGISLATION HAS PLACED STRINGENT LEGAL REQUIREMENTS ON THE MANAGEMENT OF HM AND HW. CIVILIAN AND MILITARY PERSONNEL FAILING TO FOLLOW ESTABLISHED PROCEDURES MAY BE SUBJECT TO BOTH CIVIL AND CRIMINAL PENALTIES. STRICT ADHERENCE TO ESTABLISHED PROCEDURES IS NECESSARY TO AVOID IMPOSITION OF CIVIL AND/OR CRIMINAL PENALTIES.

2. THE PURPOSE OF THIS MSG IS TO ADVISE ORGANIZATIONAL PERSONNEL THAT MCB ENVIRONMENTAL PERSONNEL WILL BEGIN COMPLIANCE INSPECTIONS

DLVR:CG SIXTH MAB(6)...ACT
DLVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...ACT
DLVR:NAVHOSP CAMP LEJEUNE NC(4)...ACT
DLVR:HQ NUC II MAF(7)...ACT

NREA(2)...ORIG FOR CG MCB CAMP LEJEUNE(118) /13/
BFAC(1) GSTF(12) SSTF(85) OCDR(14) CEOA(1) BSDO(1) BCOS(1)
OICB(1)

G-4(1)...ACT FOR CG II MAF(3) 06200/ 7/0116
CFU(1) S-S(1)

RTD:000-075/COPIES:0142

432290/303 1 OF 2 MATA0034 303/00:11Z 291625Z OCT 86
CSN:RXIC00002 CG MCB CAMP LE

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

OF ALL WORK SITES/SHOPS WHERE HW ARE ROUTINELY GENERATED OR STORED. USED SOLVENTS, DEGREASERS, ELECTROLYTE, LITHIUM BATTERIES AND WASTE OIL WITH CERTAIN REGULATED CONTAMINANTS ARE EXAMPLES OF ROUTINELY GENERATED HW. THE SUBJ INSPECTIONS ARE BEING INITIATED IN RESPONSE TO REF (B) WHICH IDENTIFIED SERIOUS DISCREPANCIES REGARDING IMPLEMENTATION OF FEDERAL/STATE REGULATIONS OUTLINED IN REF (A).

3. THE INSPECTIONS WILL BE CONDUCTED UNDER THE COGNIZANCE OF THE DIR, NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS (NREA). INSPECTIONS WILL BE SCHEDULED IN COOPERATION WITH HMDCS FOR EACH MAJOR CMD. EACH INSPECTION WILL RESULT IN A WRITTEN REPT LISTING SPECIFIC VIOLATIONS OF REF (A) AND THE REGULATIONS CITED THEREIN. THE INSPECTIONS WILL BE AT THE BN/SEPARATE COMPANY (OR EQUIVALENT) LEVEL AND WILL CONSIST OF THE FOLLOWING:

A. AN INBRIEF FOR THE COGNIZANT S-4 AND OTHER OFFICIALS.

B. A REVIEW OF BN/COMPANY RECORDS AND EFFORTS TO ENSURE COMPLIANCE WITH REF (A).

C. AN INSPECTION OF SELECTED HW GENERATION AND STORAGE SITES.

D. AN OUTBRIEF FOR THE COGNIZANT S-4.

E. TRANSMITTAL OF A WRITTEN INSPECTION REPT LISTING DISCREPANCIES AND REQUIRED CORRECTIVE ACTION VIA THE CHAIN OF COMMAND.

F. A REINSPECTION TO DETERMINE ADEQUACY OF FOLLOWUP CORRECTIVE ACTION. THE REINSPECTION WILL BE CONDUCTED APPROXIMATELY 15 DAYS AFTER THE ORIGINAL INSPECTION UNLESS OTHERWISE SPECIFIED IN THE INSPECTION REPT.

4. POC ON THIS MATTER IS MR. DANNY SHARPE, NREA, EXTS 2083/2195.

BT

ROUTINE

R 291625Z OCT 86

FM CG MCB CAMP LEJEUNE NC

TO CG SECOND MARDIV
CG SECOND FSSG
HQ NUC II MAF
NAVDENCLINIC CAMP LEJEUNE NC
CG SIXTH MAB
CG II MAF
NAVHOSP CAMP LEJEUNE NC
MCB CAMP LEJEUNE NC

INFO MCAS NEW RIVER NC

UNCLAS //N06280//

SUBJ: HAZARDOUS MATERIAL DISPOSAL PROGRAM

A. BO 6240.5
B. ON-SITE HAZARDOUS WASTE (HW) INSPECTION BY EPA AND STATE DHS OF

26 JUN 86

1. REF (A) PROMULGATES THE RESPONSIBILITIES, PROCEDURES AND GUIDELINES FOR HAZARDOUS MATERIAL (HM) AND HW HANDLING, LABELING, PACKAGING, STORAGE AND TRANSPORTATION. COMPREHENSIVE FEDERAL LEGISLATION HAS PLACED STRINGENT LEGAL REQUIREMENTS ON THE MANAGEMENT OF HM AND HW. CIVILIAN AND MILITARY PERSONNEL FAILING TO FOLLOW ESTABLISHED PROCEDURES MAY BE SUBJECT TO BOTH CIVIL AND CRIMINAL PENALTIES. STRICT ADHERENCE TO ESTABLISHED PROCEDURES IS NECESSARY TO AVOID IMPOSITION OF CIVIL AND/OR CRIMINAL PENALTIES.

2. THE PURPOSE OF THIS MSG IS TO ADVISE ORGANIZATIONAL PERSONNEL THAT MCB ENVIRONMENTAL PERSONNEL WILL BEGIN COMPLIANCE INSPECTIONS

DLVR:CG SIXTH MAB(6)...ACT
DLVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...ACT
DLVR:NAVHOSP CAMP LEJEUNE NC(4)...ACT
DLVR:HQ NUC II MAF(7)...ACT

NREA(2)...ORIG FOR CG MCB CAMP LEJEUNE(118) /13/
BFAC(1) GSTF(12) SSTF(85) OCDR(14) CEOA(1) BSDO(1) BCOS(1)
OICB(1)

G-4(1)...ACT FOR CG II MAF(3) 06200/ 7/0116
CFU(1) S-S(1)

RTD:000-075/COPIES:0142

OF ALL WORK SITES/SHOPS WHERE HW ARE ROUTINELY GENERATED OR STORED. USED SOLVENTS, DEGREASERS, ELECTROLYTE, LITHIUM BATTERIES AND WASTE OIL WITH CERTAIN REGULATED CONTAMINANTS ARE EXAMPLES OF ROUTINELY GENERATED HW. THE SUBJ INSPECTIONS ARE BEING INITIATED IN RESPONSE TO REF (B) WHICH IDENTIFIED SERIOUS DISCREPANCIES REGARDING IMPLEMENTATION OF FEDERAL/STATE REGULATIONS OUTLINED IN REF (A).

3. THE INSPECTIONS WILL BE CONDUCTED UNDER THE COGNIZANCE OF THE DIR, NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS (NREA). INSPECTIONS WILL BE SCHEDULED IN COOPERATION WITH HMDCS FOR EACH MAJOR CMD. EACH INSPECTION WILL RESULT IN A WRITTEN REPT LISTING SPECIFIC VIOLATIONS OF REF (A) AND THE REGULATIONS CITED THEREIN. THE INSPECTIONS WILL BE AT THE BN/SEPARATE COMPANY (OR EQUIVALENT) LEVEL AND WILL CONSIST OF THE FOLLOWING:

A. AN INBRIEF FOR THE COGNIZANT S-4 AND OTHER OFFICIALS.

B. A REVIEW OF BN/COMPANY RECORDS AND EFFORTS TO ENSURE COMPLIANCE WITH REF (A).

C. AN INSPECTION OF SELECTED HW GENERATION AND STORAGE SITES.

D. AN OUTBRIEF FOR THE COGNIZANT S-4.

E. TRANSMITTAL OF A WRITTEN INSPECTION REPT LISTING DISCREPANCIES AND REQUIRED CORRECTIVE ACTION VIA THE CHAIN OF COMMAND.

F. A REINSPECTION TO DETERMINE ADEQUACY OF FOLLOWUP CORRECTIVE ACTION. THE REINSPECTION WILL BE CONDUCTED APPROXIMATELY 15 DAYS AFTER THE ORIGINAL INSPECTION UNLESS OTHERWISE SPECIFIED IN THE INSPECTION REPT.

4. POC ON THIS MATTER IS MR. DANNY SHARPE, NREA, EXTS 2083/2195.

BT

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

PAGE	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	CIC	ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO					
01 OF 03				RR		UUUU				2960930

BOOK

MESSAGE HANDLING INSTRUCTIONS

FROM: CG MCB CAMP LEJEUNE NC

TO: CG SECOND MARDIV

CG SIXTH MAB

CG SECOND FSSG

CG II MAF

HQ NUC II MAF

NAVHOSP CAMP LEJEUNE NC

NAVDENCLINIC CAMP LEJEUNE NC

MCB CAMP LEJEUNE NC

INFO MCAS NEW RIVER NC

UNCLAS //N06280//

SUBJ: HAZARDOUS MATERIAL DISPOSAL PROGRAM

A. BO 6240.5

B. ON-SITE HAZARDOUS WASTE (HW) INSPECTION BY EPA AND STATE DHS OF 26 JUN 86

1. REF (A) PROMULGATES THE RESPONSIBILITIES, PROCEDURES AND GUIDELINES FOR HAZARDOUS MATERIAL (HM) AND HW HANDLING, LABELING, PACKAGING, STORAGE AND TRANSPORTATION. COMPREHENSIVE FEDERAL LEGISLATION HAS PLACED STRINGENT LEGAL REQUIREMENTS ON THE MANAGEMENT OF

DISTR:
|NREA|BFAC|GSTF|SSTF|OCDR|CEOB|BSDO|BCOS|

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

J. I. Wooten

J. I. WOOTEN, NREA, GS-12, 5003

SPECIAL INSTRUCTIONS

SJA ——— FAC ———

RELEASER

TYPED NAME, TITLE, OFFICE SYMBOL AND PHONE

T. J. DALZELL, AC/S FAC, 3034

28 OCT 1986

SIGNATURE

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE TIME GROUP

DD FORM 1 MAR 75 173/2 (OCR) PREVIOUS EDITION IS OBSOLETE S/N 0102-LF-000-1735 ★ U.S. GPO 1981 336-081 E 2193:321

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

PAGE	DTG:RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	CIC	ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO					
02 OF 03				RR		UUUU				2960930

BOOK

MESSAGE HANDLING INSTRUCTIONS

HM AND HW. CIVILIAN AND MILITARY PERSONNEL FAILING TO FOLLOW ESTABLISHED PROCEDURES MAY BE SUBJECT TO BOTH CIVIL AND CRIMINAL PENALTIES. STRICT ADHERENCE TO ESTABLISHED PROCEDURES IS NECESSARY TO AVOID IMPOSITION OF CIVIL AND/OR CRIMINAL PENALTIES.

2. THE PURPOSE OF THIS MSG IS TO ADVISE ORGANIZATIONAL PERSONNEL THAT MCB ENVIRONMENTAL PERSONNEL WILL BEGIN COMPLIANCE INSPECTIONS OF ALL WORK SITES/SHOPS WHERE HW ARE ROUTINELY GENERATED OR STORED. USED SOLVENTS, DEGREASERS, ELECTROLYTE, LITHIUM BATTERIES AND WASTE OIL WITH CERTAIN REGULATED CONTAMINANTS ARE EXAMPLES OF ROUTINELY GENERATED HW. THE SUBJ INSPECTIONS ARE BEING INITIATED IN RESPONSE TO REF {B} WHICH IDENTIFIED SERIOUS DISCREPANCIES REGARDING IMPLEMENTATION OF FEDERAL/STATE REGULATIONS OUTLINED IN REF {A}.

3. THE INSPECTIONS WILL BE CONDUCTED UNDER THE COGNIZANCE OF THE DIR, NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS {NREA}. INSPECTIONS WILL BE SCHEDULED IN COOPERATION WITH HMDCS FOR EACH MAJOR CMD. EACH INSPECTION WILL RESULT IN A WRITTEN REPT LISTING SPECIFIC VIOLATIONS OF REF {A} AND THE REGULATIONS CITED THEREIN. THE INSPECTIONS WILL BE AT THE BN/SEPARATE COMPANY {OR EQUIVALENT} LEVEL AND WILL CONSIST OF THE FOLLOWING:

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

DD FORM 1 MAR 79 173/2 (OCR)

PREVIOUS EDITION IS OBSOLETE
S/N 0102-LF-000-1735

★ U.S. GPO 1981 - 336-081

E 2193:321

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

PAGE	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	CIC	ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO					
03 OF 03				RR		UUUU				2960930

BOOK

MESSAGE HANDLING INSTRUCTIONS

A. AN INBRIEF FOR THE COGNIZANT S-4 AND OTHER OFFICIALS.

B. A REVIEW OF BN/COMPANY RECORDS AND EFFORTS TO ENSURE COMPLIANCE WITH REF (A).

C. AN INSPECTION OF SELECTED HW GENERATION AND STORAGE SITES.

D. AN OUTBRIEF FOR THE COGNIZANT S-4.

E. TRANSMITTAL OF A WRITTEN INSPECTION REPT LISTING DISCREPANCIES AND REQUIRED CORRECTIVE ACTION VIA THE CHAIN OF COMMAND.

F. A REINSPECTION TO DETERMINE ADEQUACY OF FOLLOWUP CORRECTIVE ACTION. THE REINSPECTION WILL BE CONDUCTED APPROXIMATELY 15 DAYS AFTER THE ORIGINAL INSPECTION UNLESS OTHERWISE SPECIFIED IN THE INSPECTION REPT.

4. POC ON THIS MATTER IS MR. DANNY SHARPE, NREA, EXTS 2083/2195.

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

DD FORM 1 MAR 79 173/2 (OCR) PREVIOUS EDITION IS OBSOLETE S/N 0102-LF-000-1735 ★ U.S. GPO: 1981 336 081 E 2193:321

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

20 Oct 86
Date

From: Director
To: AC/S Fac

Subj: Proposed Haz Waste Inspection Message

Col Dalzell,

As discussed 17 Oct 86 the attached is provided.

V/R

Julian

RECEIVED
20 OCT 1986

Reference (a) promulgates the responsibilities, procedures and guidelines for hazardous material and hazardous waste handling, labeling, packaging, storage and transportation. Comprehensive federal legislation has placed stringent legal requirements on the management of hazardous material and hazardous waste. Civilian and military personnel failing to follow established procedures may be subject to both civil and criminal penalties. Strict adherence to established procedures is necessary to avoid imposition of civil and/or criminal penalties.

~~4. Results of~~ reference (b) identified ~~serious~~ discrepancies in the subject programs and the implementation of Federal/State EPA regulations. Corrective action has been/is being initiated to correct discrepancies

BILLETING FUND
Marine Corps Base
Camp Lejeune, North Carolina

SECTION A - FINDINGS AND RECOMMENDATIONS

1. Previous Findings. There were no findings reported in the previous Periodic Audit Report.

2. Current Period Findings. There were no findings of significance to warrant inclusion in this report.

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

PAGE	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	CIC	ORIG/MSG IDENT
	DATE-TIME	MONTH	YR	ACT	INFO					
X 01 OF 03				RR		UUUU				2930900 X

BOOK | MESSAGE HANDLING INSTRUCTIONS

FROM: CG MCB CAMP LEJEUNE NC

TO: CG SECOND MARDIV

CG SIXTH MAB

CG SECOND FSSG

CG II MAF

HQ NUC II MAF

NAVHOSP CAMP LEJEUNE NC

NAVDENCLINIC CAMP LEJEUNE NC

MCB CAMP LEJEUNE NC

INFO MCAS NEW RIVER NC

Proposed

UNCLAS //N06280//

SUBJ: ~~COMPLIANCE INSPECTIONS OF~~ HAZARDOUS ~~WASTE (HW) GENERATION AND STORAGE SITES/SHOPS~~ Material Disposal Program

~~A.~~ b ONSITE HW INSPECTION BY EPA AND STATE DHS OF 26 JUN 86

B. BO 6240.5

2 ~~1.~~ a THE PURPOSE OF THIS MSG IS TO ADVISE ~~COGNIZANT OFFICIALS~~ organizational personnel THAT MCB ENVIRONMENTAL PERSONNEL WILL BEGIN ~~THE SUBJ~~ COMPLIANCE INSPECTIONS OF ALL WORK-SITES/SHOPS ~~OPERATED BY MCB AND MCB TENANTS~~ WHERE HW ARE ROUTINELY GENERATED OR STOPED. USED SOLVENTS, DEGREASERS, ELECTROLYTE,

6 5 4 3 2 1 0

DISTR:
|NREA|BFAC|GSTF|SSTF|OCDR|CEOB|OICB|BSDO| BCOs

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE
J. I. Wooten
J I WOOTEN, NREA, GS-12, 5003

SPECIAL INSTRUCTIONS
SJA ——— FAC———

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	CIC	ORIG/MSG IDENT
	DATE-TIME	MONTH	YR	ACT	INFO					
02 OF 03				RR		UUUU				2930900

BOOK

MESSAGE HANDLING INSTRUCTIONS

LITHIUM BATTERIES AND WASTE OIL WITH CERTAIN REGULATED CONTAMINANTS ARE EXAMPLES OF ROUTINELY GENERATED HW. THE SUBJ INSPECTIONS ARE BEING INITIATED IN RESPONSE TO REF A WHICH IDENTIFIED SERIOUS DISCREPANCIES REGARDING IMPLEMENTATION OF FEDERAL/STATE REGULATIONS OUTLINED IN REF B.

2. THE INSPECTIONS WILL BE CONDUCTED UNDER THE COGNIZANCE OF THE DIR, NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS (NREA). INSPECTIONS WILL BE SCHEDULED IN COOPERATION WITH HMDCS FOR EACH MAJOR ~~TENANT~~ COMMAND. EACH INSPECTION WILL RESULT IN A WRITTEN REPT LISTING SPECIFIC VIOLATIONS OF REF B AND THE REGULATIONS CITED THEREIN. THE INSPECTIONS WILL BE AT THE BN/SEPARATE COMPANY (OR EQUIVALENT) LEVEL AND WILL CONSIST OF THE FOLLOWING:

A. AN INBRIEF FOR THE COGNIZANT S-4 AND OTHER OFFICIALS. ~~IF DESIRED.~~

B. A REVIEW OF BN/COMPANY RECORDS AND EFFORTS TO ENSURE COMPLIANCE WITH REF B.

C. AN INSPECTION OF SELECTED HW GENERATION AND STORAGE SITES.

D. AN OUTBRIEF FOR THE COGNIZANT S-4. ~~IF DESIRED.~~

E. TRANSMITTAL OF A WRITTEN INSPECTION REPORT LISTING DIS-

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

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

PAGE	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	CIC	ORIG/MSG IDENT
	DATE-TIME	MONTH	YR	ACT	INFO					
03 OF 03				RR		UUUU				2930900

BOOK

MESSAGE HANDLING INSTRUCTIONS

CREPANCIES AND REQUIRED CORRECTIVE ACTION ~~TO THE COGNIZANT COMMAND~~.

F. A REINSPECTION TO DETERMINE ADEQUACY OF FOLLOWUP CORRECTIVE ACTION. THE REINSPECTION WILL BE CONDUCTED APPROXIMATELY 15 DAYS AFTER THE ORIGINAL INSPECTION UNLESS OTHERWISE SPECIFIED IN THE INSPECTION REPT.

4/ G. POC ON THIS MATTER IS MR. DANNY SHARPE, NREA, EXTENSIONS 2083/ 2195.

6 5 4 3 2 1 0

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

DD FORM 1 MAR 79 173/2 (OCR) PREVIOUS EDITION IS OBSOLETE S/N 0102-LF-000-1735 ★ U.S. GPO 1981—336-081 E 2193:321

JdW Danny DBS

(804) 445-2935

5090
1143SCO

22 OCT 1986

From: Commander, Atlantic Division, Naval Facilities Engineering Command
To: Commanding General, Marine Corps Base, Camp Lejeune

Subj: HAZARDOUS WASTE, USED SOLVENT ELIMINATION AND POLYCHLORINATED BIPHENYL COMPLIANCE ASSESSMENTS

Ref: (a) OPNAVINST 5090.1
(b) PHONCON MARCORB Camp Lejeune (Mr. Danny Sharpe)/LANTNAVFACENGCOM (Mr. Steve Olson) of 10 Oct 86

1. In accordance with references (a) and (b), Messrs. John Kresky, GS-11, Environmental Engineer and Steve Olson, GS-12, Environmental Protection Specialist will conduct Hazardous Waste, Used Solvent Elimination and Polychlorinated Biphenyl Compliance Assessments at Marine Corps Base, Camp Lejeune on 29-31 October 1986.

2. The purpose of the assessments is to determine activity compliance with applicable Federal and State regulations and DOD Directives concerning these program areas. Upon completion of the assessments, reports will be provided to the activity, major claimant, NEESA and COMNAVFACENGCOM.

3. Our points of contact are Mr. Steve Olson or Mr. John Kresky, at AUTOVON 565-2935.

J. R. BAILEY
By direction

Copy to:
CHC
NAVFACENGCOM
DPMS Battle Creek
DPMR Memphis
DRMO Camp Lejeune
MCAS New River

Blind Copy to:
11S
114
114S
09BS
Doc #0966Z/pvc

6240
NREAD
14 Oct 86

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

Subj: INSPECTION REPORT ON LONG TERM HAZARDOUS WASTE STORAGE FACILITIES AT BUILDINGS TP-451 and TP-463

Ref: (a) Onsite inspection by Mr. S. Gwynn, NREAD, and Mr. Eggers, DRMO, on 14 Oct 86
(b) CG MCB ltr FAC/REA/hf 6280 of 15 Jul 83

Encl: (1) Inspection Checklist for Long Term Hazardous Waste Storage Facilities at Buildings TP-451 and TP-463

1. The enclosure provides results of reference (a) as required by reference (b). No discrepancies were noted. Point of Contact is Mr. Sammy Gwynn, NREAD, extension 5003/2195.

J. I. WOOTEN
By direction

Copy to:
AC/S FAC
EFDSOUTH
SJA
NRO
SSAFETYMGR

INSPECTION CHECKLIST FOR LONG TERM HAZARDOUS WASTE/MATERIALS STORAGE FACILITIES AT TP-451/TC-463

PARTICIPANTS Gwynn, Becker, Martin, Eggars DATE: 14 Oct 1986

FACILITIES AND EQUIPMENT	SAT	UNSAT	COMMENTS
1. FACILITY GROUNDS	X		
2. FACILITY SECURITY (LOCKS, DOORS, SIGNS, ETC.)	X		
3. EMERGENCY TELEPHONE AND FIRE ALARMS	X		
4. UNLOADING PAD DRAIN VALVE	X		
5. EXHAUST FANS	X		
6. INTERIOR LIGHTING AND ELECTRICAL OUTLETS	X		
7. SAFETY SHOWERS/ EYE LAVAGES	X		
8. CURBS, GRATES, OTHER FIXTURES	X		
9. NON-SPARKING SHOVELS (2)	X		
10. ABSORBENT (EQUIVALENT OF FOUR 55-GAL BARRELS)	X		
11. HAZ MAT PUMPS OR EQUIVALENT	X		
12. FIRE EXTINGUISHERS	X		
13. PROTECTIVE GEAR AND EQUIPMENT	X		
14. EMPTY CONTAINERS AND OVERPACK DRUMS	X		

OPERATIONAL CONSIDERATIONS	SAT	UNSAT	COMMENTS
1. Required operator inspections and Inspection Log	X		
2. Emergency Contingency Plan Posting & Operator Familiarity	X		
3. Fire Department Phone number posting	X		
4. Condition of containers in use	X		
5. Presence of odors/vapors, residues in sumps, deck, etc.	X		
6. Unloading Pad Valve Operation	X		
7. Compatibility of Material Storage	X		
8. Implementation of previously recommended corrective action	X		
9. Facility Operators since last Inspection	X		George Eggars and William King

ADDITIONAL COMMENTS, EXPLANATIONS, ETC:

T-6240

6240
NREAD
3 Jun 86

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commander, NESSA, Port Hueneme, CA 93043 (Code 112H)

Subj: HAZARDOUS WASTE (HW) ANNUAL REPORT

Ref: (a) OPNAV INST 5090.1
(b) MCO P11000.8B
(c) Contract No. N62470-85-C-7979

Encl: (1) Hazardous Waste Annual Report for Calendar Year 1985

1. The enclosure is provided, as required by reference (a), per Marine Corps guidance provided in reference (b). The enclosure addresses all HW generation within the Camp Lejeune Complex during CY-85.

2. Please note that a comprehensive HW management plan is being prepared for the Camp Lejeune Complex under reference (c) and will be used as the official basis for planning and programming aboard the Camp Lejeune Complex for hazardous material and hazardous waste management.

3. It is recommended that the information in the enclosure not be further processed until the data contained therein is evaluated related to the above discussed management plan.

4. For further information please contact Mr. Danny Sharpe, AV 484-5003; FTS 676-5003 or commercial (919) 451-5003.

JULIAN I. WOOTEN
By direction

1958D

CY85 HAZARDOUS WASTE ANNUAL REPORT

Instructions for completing and forwarding this report are provided in the HWAR Guide, NEESA 15-023*

PART A. BASIC ACTIVITY INFORMATION

* SECTION 1 **********

a) UIC NUMBER: M67001 b) ACTIVITY NAME: Marine Corps Base, Camp Lejeune

c) HW CONTACT: Danny Sharpe d) CODE:

e) PHONE (AV,FTS,Commercial): V 484-5003; FTS 676-5003; Com (919) 451-5003

* SECTION 2 **********

	(Check one) YES	NO
a) HW GENERATOR?	[X]	[ ]
b) HOST ACTIVITY?	[X]	[ ]
c) TENANT ACTIVITY?	[ ]	[X]

Note: Addresses all commands with Camp Lejeune/Marine Corps Air Station, New River

• d) GENERATOR CLASS:

	CLASS I Generates or accumulates 1000 kg or more HW or 1 kg or more acute HW per month	CLASS II Generates or accumulates 100-1000 kg HW and less than 1 kg acute HW per month	CLASS III Generates or accumulates less than 100 kg HW and less than 1 kg acute HW per month
(Check one)	[X]	[ ]	[ ]

(If activity is a Class III Generator, no further information is required.)

NOTE: Items in **BOLD FACE** are located in the HWAR Guide, NEESA 15-023 glossary.

*NEESA, Naval Energy and Environmental Support Activity, Code 112H, Port Hueneme, CA 93043, (805) 982-4504, A/V 360-4504, FTS 779-4504

PART A. (Continued)

* SECTION 3 ***\

PART B. HAZARDOUS WASTE MANAGEMENT INFORMATION

* SECTION 1 **********

a) RCRA HW PERMIT NUMBER: NC 6170022580
(NC 8170022570 MCAS,NR)

b) RCRA HW PERMIT STATUS:

	(Circle yes or no)		TYPE OF PERMIT (Circle all that apply)
Part A Permit RECEIVED:	NO YES		T S D
Part B Permit APPLIED FOR:	NO (YES)	DATE: 7/15/83	T S D
Part B Permit RECEIVED:	NO (YES)	DATE: 9/7/84	T (S) D

c) OTHER TREATMENT, STORAGE OR DISPOSAL PERMITS (Non-RCRA):

Permit Number	Type of Permit	Issuing Agency
1. NC0003239	NPDES	EPA Region IV
2. 67-03	Solid Waste Permit	NC Division of Health Services

d) DOES ACTIVITY HAVE A STATE WASTE HAULER'S PERMIT? (Circle one) (YES) NO

e) LIST FACILITIES (plants, buildings or operations) ENGAGED IN HW TREATMENT, STORAGE OR DISPOSAL AT THE ACTIVITY. GIVE A SHORT DESCRIPTION OF EACH.

TREATMENT:	STORAGE:	DISPOSAL:
	TP-451*	
	TC-863*	

*DRMO operated storage facilities for long term storage of HM/HW awaiting disposal.

* SECTION 2 **********

a) ANNUAL HW MANAGEMENT COSTS FOR CY (if none, so state):

Treatment	$
Storage	$ None
Disposal	$ None
DRMO	$171,217
Other	$ None
TOTAL COSTS	$171,217

b) PERSONNEL REQUIREMENT: N/A (labor years)

Part B (Continued)

* SECTION 3 **********

DOCUMENT STATUS

DOCUMENT	REQUIRED?* (Circle one)	DATE COMPLETED
Hazardous Waste Management Plan (HWMP)	NO (YES)	22 Jun 82*
HS Spill Contingency Plan	NO (YES)	28 May 81*
HS Spill Prevention Control & Countermeasure Plan (SPCC)	NO (YES)	1 Aug 83*
Waste Analysis Plan	NO (YES)	7 Sep 84
Inspection Schedule	NO (YES)	7 Sep 84
Training Program	NO (YES)	7 Sep 84
Groundwater Quality Assessment Program Outline .	(NO) YES	NA
Groundwater Monitoring Program	(NO) YES	NA
Closure Plan	NO (YES)	7 Sep 84
Post-closure Plan	(NO) YES	NA

* Each of these documents is in the process of being revised by ENSAFE; Due-CY-86 During

* SEE TABLE I-2 OF HWAR GUIDE FOR SUMMARY OF REQUIRED DOCUMENTS.

* SECTION 4 **********

a) NUMBER OF HW EXCEPTION REPORTS FILED AND CURRENT STATUS: None filed

b) NUMBER OF HW REGULATORY INSPECTIONS RECEIVED CY: 2

FOR EACH INSPECTION, LIST: INSPECTIONS, DATE, INSPECTING ORGANIZATION, SUMMARY OF FINDINGS & CURRENT STATUS (copies of inspection report summaries may be attached in lieu of write-up). BRIEFLY DESCRIBE ALL LAWSUITS, HW NON-COMPLIANCE NOTICES, OR NOTICES OF VIOLATIONS (NOVs) RECEIVED (and RESOLVED) BY THE ACTIVITY, THAT RESULTED FROM EACH INSPECTION IN CY.

Inspection - 9-5-85
Reinspection - 10-16-85

Inspected by Division of Health Services Solid & Hazardous Waste Management Branch
Weekly inspection records & personnel training records need to be upgraded

PART C. HAZARDOUS MATERIAL RECYCLING

* SECTION 1 **********

a) DOES ACTIVITY HAVE A RECYCLING PROGRAM? (If "no", skip the remainder of Part C.) — (Circle one) (YES) NO

b) DOES THE RECYCLING PROGRAM MEET THE REQUIREMENTS OF A QUALIFIED RECYCLING PROGRAM? (See glossary for explanation) — (Circle one) YES (NO) (See Note 1: Below)

c) DOES ACTIVITY HAVE A USED SOLVENT ELIMINATION (USE) PROGRAM? — (Circle one) (YES) NO

If "yes", are solvents recycled/replaced by:

- o On-site Distillation — YES NO
- o Organic Solvents Replaced by Water Compounds — YES NO
- o Solvent Rental — (YES) NO
- o Off-site Recycling — (YES) NO (DRMO)
- o Other Method _____ (Specify)

d) DOES ACTIVITY HAVE A USED OIL RECYCLING PROGRAM? — YES NO

If "yes", specify quantity of used oil recycled by each of the following methods:

- o Re-refining On-site: 0 Gallons
- o Re-refining Off-site: 0 Gallons
- o Burning: 0 Gallons
  Specify quantity of virgin fuel mixed with used oil: 0 Gallons
- o Sold: 0 Gallons
- o Reutilized by DOD Facilities: 0 Gallons
- o Transferred by Non-DOD Federal Agencies: 43,986 Gallons
- o Donated to Non-federal Agencies: 0 Gallons

Note 1. Program is being set up, will be in place by end of CY-86

PART C. (Continued)

e) RECYCLING REVENUES RECEIVED BY ACTIVITY:

Recycling Program	COST ($)	Gross Revenues ($)	Savings ($)	Net Revenues (Net=Gross - Cost + Savings) ($)
Used Oil				0
Used Solvent Elimination (USE)				0
Other Programs (Specify)				0
TOTAL				0

* SECTION 2 **********

OTHER HAZARDOUS MATERIAL RECYCLED: (Use separate sheet of paper if needed)

EPA OR DOT #	MATERIAL NAME	QUANTITY (Gallons-G or Pounds-P)	USE Program (Y or N)	RECYCLING METHOD

PART D. HAZARDOUS WASTE OPERATIONS

19590

READ THE INSTRUCTIONS IN THE HWAR GUIDE BEFORE COMPLETING PART D

NAME AND UIC NUMBER OF GENERATOR Marine Corps Base, Camp Lejeune M-67001
(If Host is submitting Part D for its Tenants, complete a separate page for each activity listed as generating HW).

WASTE STATUS CODES

N - On-site
F - Off-site (Contractor or another activity)
D - by DRMO (for Treatment or Disposal only)
A - DRMO Accountable (for Storage only)
C - DRMO Custody (for Storage only)

ABBREVIATIONS FOR UNITS

Pounds - P
Gallons - G
Tons - T
Kilograms - K
Cubic Feet - F
Cubic Yards - Y

WASTE IDENTIFICATION		WASTE ORIGIN **		WASTE STATUS as of 31 Dec CY **					
WASTE ID NUMBER (EPA or DOT)	WASTE DESCRIPTION	QUANTITY GENERATED In Report CY (Specify Units)	QUANTITY BACKLOGGED From Previous CY (Specify Units)	QUANTITY STORED (Specify Units)	STORAGE STATUS CODE (N,F,A, or C)	QUANTITY TREATED (Specify Units)	TRTMT. STATUS CODE (N,F, or D)	QUANTITY DISPOSED OF (Specify Units)	DISP. STATUS CODE (N,F, or D)
None	HW Liquid, NOS			14P	C			926P	F
D001	Flammable liquids	15504P	N/A	10737P	C			30141P	F
D001	Paint Related Wastes	5442P		1299P	C			2775P	F
D001	Waste CompressedGas NOS	9P		9P					
D001	Waste NAPTHA	500P						459P	F
D001	Isoprophyl Alcohol	1001P		84P	C				
D001	Waste Solvent	4128P		3711P	C				
D001	Combustible liq, NOS	12685P		6881P	C			17028P	F
D001	Methyl Alcohol	7414P		6881P	C				
D001	Magnesium Batts	1232P		1232P	C				

** NOTE: QUANTITIES GENERATED + BACKLOGGED = QUANTITIES STORED + TREATED + DISPOSED

SEE FOLLOWING PAGE FOR BLANK PART D FORMAT PAGE

UIC Number _____

WASTE IDENTIFICATION		WASTE ORIGIN		WASTE STATUS as of 31 Dec CY					
WASTE ID NUMBER (EPA or DOT)	WASTE DESCRIPTION	QUANTITY GENERATED In Report CY (Specify Units)	QUANTITY BACKLOGGED From Previous CY (Specify Units)	QUANTITY STORED (Specify Units)	STORAGE STATUS CODE (N,F,A, or C)	QUANTITY TREATED (Specify Units)	TRTMT. STATUS CODE (N,F, or D)	QUANTITY DISPOSED (Specify Units)	DISP. STATUS CODE (N,F, or D)
D001/D002	Corrosive liq, NOS			179P	C				
D002	Corrosive solid,NOS	100P		100P	C				
D002	Corrosive liq, NOS	2030P		3828P	C			5830P	F
D002	Corrosive liq, paint stripper	1835P		50P	C				
D002	Waste Oxidizer.			20P	C			5082P	F
D002	Barium Peroxide							8P	F
D002	Ammonium Nitrate							8P	F
D002	Perchloril Acid							8P	F
D002	Hydrogen Peroxide							8P	F
D002	Ammonium Sulfate							8P	F
D002	Ammonium Hydroxide							5688P	F
D002	Creosol							8P	F
D002	Bromine Water							8P	F
D003	Lithium Batt	2969P		4281P	C			22743P	F
D003	Misc Chemicals							91P	F
D009	Mercury Waste	123P		606P	C			515P	F
D013	Lindane							400P	F
F001	Waste Degreasers	4462P		968P	C			1835P	F
F003	Xylene, Acetone	1376P						1751P	F
F005	Methyl Ethyl Ketone			66P	C			1460P	F
None	Hazardous Waste Solid NOS							668P	F
None	Poison B, NOS			255P	C			67P	F
D003	Methyl Ethyl Ketone Peroxide					4P	N		
D003	Ether					16P	N		

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

IN REPLY REFER TO

LFF-2:PCH:yum

6 NOV 1980

From: Commandant of the Marine Corps
To: Commanding General, Marine Corps Base,
~~Camp Lejeune NC 28586~~

Subj: Marine Corps Compliance with Hazardous Waste Regulations

Ref: (a) MCO P11000.8A
(b) COMCABEAST/MCB Camp Lejeune Logistic Support Service Agreement Revision No. 1 of March 1977
(c) 40 CFR Parts 260 to 265 and 122 to 124 of 19 May 1980
(d) MCBul 6280 of 1 Oct 1980

Encl: (1) Recommended Content for a Memorandum of Understanding Regarding Non-contiguous Activity Requirements for Compliance with Hazardous Waste Management Regulations

1. Reference (a) establishes policy and implements a program for protection of the environment within the Marine Corps. The Order recommends designation of single responsibility for the management of natural resources and environmental affairs for MCB Camp Lejeune and MCAS(H) New River. This was accomplished within a Logistic Support Service Agreement between the two facilities, most recently updated by reference (b). A national program to ensure proper handling and disposal of hazardous wastes was established by reference (c). The unique notification and reporting requirements associated with these regulations create ambiguity regarding the responsibilities of MCB Camp Lejeune and MCAS(H) New River as set forth in references (a) and (b). This letter provides guidance to ensure full compliance with the Resource Conservation and Recovery Act (RCRA) implementing regulations while maintaining the MCB Camp Lejeune service support role to the maximum extent practicable. It is recommended that the guidance provided herein be incorporated into the next update of reference (b).

2. The RCRA program provides a cradle-to-grave (generation to ultimate disposal) approach for the management of hazardous wastes. Administrative procedures associated with these regulations include certain notification, permitting and annual reporting requirements which must be met within specific time frames by generators, transporters, storers, processors, and disposers of hazardous wastes. Normally, these requirements would be the responsibility of MCB Camp Lejeune. The implementing regulations require, however, that activities physically separated by public access roads, who generate hazardous wastes in excess of the

ENCLOSURE (3)

Subj: Marine Corps Compliance with Hazardous Waste Regulations

quantities established in the implementing regulations, file separately a "Notification of Hazardous Waste Activity" form and comply with other administrative requirements, regardless of the internal management system established for handling hazardous wastes.

3. Reference (a) directs Marine Corps activities to comply with the spirit as well as the letter of all Federal environmental laws. This policy is extended to State and local environmental requirements by reference (d). (RCRA provides for state impleme-tation of this program when consistency requirements are met). In order to comply with the RCRA implementing regulations, MCB Camp Lejeune and MCAS(H) New River will ensure that the administrative procedures required under these regulations are met. To accomplish this, it is suggested that a Memorandum of Understanding (MOU) be established between the two Commands, delineating each activity's responsibilities for implementation of the hazardous waste management regulations. The recommended content of such a MOU, that minimizes the administrative requirements of MCAS(H) New River, is provided as the enclosure. It must be emphasized that while the designated single point of responsibility for environmental matters (i.e. MCB Camp Lejeune) can provide technical and administrative assistance to non-contiguous facilities generating quantities of hazardous wastes in excess of that specified in the regulations, the RCRA regulations require that the ultimate responsibility for proper management of hazardous wastes still rests with the non-contiguous activity (i.e. MCAS(H) New River).

4. Clarification of the special circumstances created by these regulations will be included in the next update to reference (a). Questions regarding this matter should be directed to Mr. Paul Hubbell, the Headquarters Marine Corps point of contact for implementation of the hazardous materials environmental management program. Mr. Hubbell can be reached on Autovon 224-1425/ 2171.

F. E. Petersen

Frank E. PETERSEN
By direction

Copy to:
COMCABEAST
MCAS(H) NEW RIVER

NREAD, Bldg 1103
See Twila
Hardison
& pick up the
refunds

DEPARTMENT OF THE NAVY
OFFICE OF INFORMATION
WASHINGTON, D.C. 20350

IN REPLY REFER TO
4602
OI-50
1 July 1986

MEMORANDUM FOR AREA COORDINATORS

Subj: PUBLIC AFFAIRS GUIDANCE--HAZARDOUS WASTE SITE CLEANUP

Ref: (a) OPNAVINST 5090.1
(b) CHINFO Memorandum 4602 OI-511 of 31 JAN 85

Encl: (1) Extract from 40 CFR 300
(2) Community Relations Activities at DOD Sites

1. The Navy Assessment and Control of Installation Pollutants (NACIP) Program detailed in reference (a), paragraph 11202.C, is a three-phase nationwide process to identify Navy past hazardous waste sites and take necessary cleanup action. Reference (b) provides general public affairs guidance concerning NACIP activities. The purpose of this memorandum is to address recently published Environmental Protection Agency (EPA) regulations, enclosure (1), and to expand on reference (b).

2. It remains the policy of the Department of the Navy to keep interested parties (in addition to state and local regulatory agencies) informed of NACIP activities. In this regard, the following provides guidance to ensure both compliance with regulatory requirements and the effective promulgation of information to the public.

3. The National Priority List (NPL) is an EPA listing of the nations' worst hazardous waste sites. The listing is required by the Comprehensive Environmental Restoration Compensation and Liabilities Act (CERCLA). Federal agency hazardous waste sites are evaluated by EPA for listing along with all other national sites. Enclosure (1) requires that NPL sites (including Navy sites designated as such) follow a written Community Relations Plan which must include the following:

a. Background and history of community involvement at the site, including local activity and interest, key issues and site history.

b. Site specific NACIP objectives.

c. Community relations activities to be used to meet stated objectives.

d. A schedule for the completion of NACIP activity.

e. A mailing list of affected and interested groups and individuals, plus a listing of Navy, EPA, and other agency officials responsible for community relations.

Enclosure (1)

Paula,
These are the refs I need. Pls let me borrow ref (a) & again would you check w/Mr. Sharp & me. Wooten & see if they have ref (b) or knowledge of it.
Thanks.

12000
NREAD

25 Sep 1986

Director, Natural Resources and Environmental Affairs Division,
Marine Corps Base, Camp Lejeune
Supervisory Chemist, Natural Resources and Environmental Affairs
Division, Marine Corps Base, Camp Lejeune
Via: Supervisory Ecologist, Natural Resources and Environmental Affairs
Division, Marine Corps Base, Camp Lejeune
PERSONNEL ACTION

1. As you are aware, management of the Base hazardous material/ waste program is taking almost all of Mr. Danny Sharpe's time and it appears this situation will continue for several months.

2. I desire to have Mr. Sharpe continue to work undistracted on developing and implementing the Base hazardous material/waste program. In an effort to relieve Mr. Sharpe of some of his work-load, I would like for the next 90 days to have you report directly to me rather than Mr. Sharpe on functional matters assigned to you.

3. Continue to manage your program as you have and keep me informed.

JULIAN I. WOOTEN

6240
NREAD
25 Sep 86

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

Subj: DRAFT HAZARDOUS WASTE MANAGEMENT PLAN AND USED OIL MANAGEMENT PLAN

1. Natural Resources and Environmental Affairs Division has been recently assigned responsibility for coordination of review of the subject plans. The plans are being prepared by EnSafe under contract #N62470-85-B-7979. Copies of the subject plans were provided to addresses several weeks ago by the Environmental Engineer for review and comment. Addresses are requested to provide representatives at a meeting scheduled for 0900 hours, 3 October, 1986 for the purpose of consolidating comments on the subject plans. The meeting will be held at Bldg. 1103.

2. Please advise this office as soon as possible of any significant problems which need to be resolved prior to the above addressed meeting. Point of contact is Mr. Danny Sharpe, 2083.

J. I. WOOTEN

JDW. Danny DDS

6240
NREAD

25 Sep 1986

Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
Director, Printing Plant Division, Assistant Chief of Staff, Logistics, Marine Corps Base, Camp Lejeune (Attn: Mr. Nieberger)
Via: Base Maintenance Division, Marine Corps Base, Camp Lejeune

ELECTROSTATIC CONVERSION SOLUTION; DISPOSAL OF

1. Approval is hereby given to the Base Printing Plant to dispose of waste, A. B. Dick Part Number 4-1067, Electrostatic Conversion Solution, through the sanitary sewer. The printing plant may pour up to six gallons per month down a sink drain connected to the Hadnot Point sanitary sewer system. Larger quantities will be turned over to the Utilities Division, Base Maintenance for disposal. Empty solution containers will be triple rinsed with water and disposed of in the sanitary landfill.

2. This approval is limited to the specified manufacturer and part number. If there is a change in product used, addressee is requested to provide a material safety data sheet containing hazardous component information to Natural Resources and Environmental Affairs Division for evaluation of disposal requirements. This should be done prior to discharging waste.

3. Natural Resources and Environmental Affairs point of contact on this matter is Ms. Elizabeth Betz, 451-5977.

JULIAN I. WOOTEN

- - - -

6240
NREAD

25 Sep 1986

Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
Director, Printing Plant Division, Assistant Chief of Staff, Logistics, Marine Corps Base, Camp Lejeune (Attn: Mr. Nieberger)
Via: Base Maintenance Division, Marine Corps Base, Camp Lejeune

ELECTROSTATIC CONVERSION SOLUTION; DISPOSAL OF

1. Approval is hereby given to the Base Printing Plant to dispose of waste, A. B. Dick Part Number 4-1067, Electrostatic Conversion Solution, through the sanitary sewer. The printing plant may pour up to six gallons per month down a sink drain connected to the Hadnot Point sanitary sewer system. Larger quantities will be turned over to the Utilities Division, Base Maintenance for disposal. Empty solution containers will be triple rinsed with water and disposed of in the sanitary landfill.

2. This approval is limited to the specified manufacturer and part number. If there is a change in product used, addressee is requested to provide a material safety data sheet containing hazardous component information to Natural Resources and Environmental Affairs Division for evaluation of disposal requirements. This should be done prior to discharging waste.

3. Natural Resources and Environmental Affairs point of contact on this matter is Ms. Elizabeth Betz, 451-5977.

JULIAN I. WOOTEN

Blind copy to:
WQCL,NREAD

6240
NREAD
15 Sep 86

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

Subj: CHANGES TO BASE HAZARDOUS MATERIAL DISPOSAL PROGRAM

Encl: (1) Proposed Base Order 6240.5A

1. The enclosure is currently being reviewed by major commands. Upon major command concurrence, the revised Order will be staffed by addressees prior to signature. This advance copy is provided to expedite the revision process.

2. The subject changes are required to address program deficiencies identified in recent inspections by the State of North Carolina and the Environmental Protection Agency. Each addressee is requested to advise this office of any significant problems relative to responsibilites outlined in enclosure (2) of the proposed Base Order contained in the enclosure. Point of contact is Danny Sharpe, NREAD, extension 2083.

C. D. Peterson
By direction

Dist:
AC/S Logistics
AC/S Manpower
SJA
TMO
BMO
Base Fire Chief

File Haz Waste

RECEIVED
AUG 20 1986
SOLID & HAZARDOUS WASTE MANAGEMENT BRANCH

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

In Re: United States Marine Corps Air Station)
Cherry Point
NC1170027261

ADMINISTRATIVE CONSENT AGREEMENT
DOCKET 00227

In order to resolve a dispute regarding the applicability of the Resource Conservation and Recovery Act (RCRA) and the Solid Waste Management Act and rules (N.C.G.S. 130A, Article 9, and 10 NCAC 10F), and to avoid costly protracted litigation, the United States Marine Corps Air Station, Cherry Point (USMCAS) and the State of North Carolina, Solid and Hazardous Waste Management Branch (Branch), do hereby enter into this Administrative Consent Agreement.

This Agreement does not constitute an admission by USMCAS of violation of any statute or regulations but rather is intended to establish a schedule of compliance with the first Notice of Deficiency pertaining to Section C of USMCAS's Post-Closure Plan which will minimize the site's impact on the environment and public health in a manner which is consistent with the State and Federal hazardous waste laws and rules. The first Notice of Deficiency as previously referred to is hereby incorporated by reference as if it were set forth herein. This Consent Agreement does not affect the first Notice of Deficiency except as this Consent Agreement specifically provides and does not affect any other issues which may arise between the parties. Therefore, in order to further the public interest and to protect the public health and environment, USMCAS and the North Carolina Solid and Hazardous Waste Management Branch, by and through their authorized representatives, do enter into the following Consent Agreement and agree:

STIPULATIONS AND FINDINGS OF FACT

1. USMCAS operated a surface impoundment which is a hazardous waste management facility, as defined in N.C.G.S. 130A-290(5) and 10 NCAC 10F .0002, located in Havelock, N. C., at N.C. Highway 101. USMCAS treated and stored hazardous waste as defined in N.C.G.S. 130A-290 and 10 NCAC 10F .0002.

2. 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 Solid Waste Management Act, N.C.G.S. 130A Article 9 (Act) and rules codified at 10 NCAC 10F (Rules). William L. Meyer, Head of the Solid and Hazardous Waste Management Branch, has been delegated those responsibilities.

3. Prior to November 19, 1980, USMCAS notified the United States Environmental Protection Agency (EPA) that it owned and operated the hazardous waste management facility, and has since submitted a Part A Permit Application and complied with the other requirements for achieving Interim Status under Section 3005 of RCRA.

4. 40 CFR Part 270, codified at 10 NCAC 10F .0034, contains standards and requirements applicable to owners and operators of hazardous waste management facilities which are applying for a final status permit. These regulations include requirements for groundwater quality assessment and corrective action.

5. 40 CFR Part 124, codified at 10 NCAC 10F .0035 and 40 CFR Part 270 codified at 10 NCAC 10F .0034 contain standards and procedures for permitting of hazardous waste management facilities including requirements for submission of Post-Closure Permit Applications for facilities that close surface impoundments with groundwater contamination present.

6. USMCAS was required to submit a complete permit application, as required by 40 CFR Part 124 codified at 10 NCAC 10F .0035 and 40 CFR Part 270 codified at 10 NCAC 10F .0034.

7. On May 4, 1984, the Branch requested that USMCAS submit their Part B permit application.

8. On April 30, 1985, the Branch received USMCAS's Part B permit application. The application did not contain all of the groundwater information required in 40 CFR Part 270 codified at 10 NCAC 10F .0034.

9. Nothing in this Consent Agreement shall be construed as limiting the State of North Carolina from performing its duty to protect the public health and the environment of the State as required by law.

10. This Consent Agreement shall be binding upon the officers, directors, agents, employees, successors and assigns of the Company. The Company shall provide a copy of this Consent Agreement to each contractor or other person performing any work under this Consent Agreement and shall condition each contract or agreement for such work upon these Consent Agreement terms.

11. Nothing herein shall be construed to affect any right, claims or defenses as may exist between USMCAS and any other person or entity.

12. USMCAS may propose to the Branch alternative plans and methods for providing the hydrogeologic information required by the first Notice of Deficiency, where such plans and methods are not specified in the statute or rules and where such proposed alternative plans and methods are deemed by the Branch to be equally appropriate to provide the hydrogeologic information required by the first Notice of Deficiency. The Branch shall review such proposals and shall notify USMCAS within 10 working days of receipt whether such proposal is approved or disapproved. In the event that USMCAS is notified that such proposal is disapproved in whole or in part, the Branch shall advise USMCAS by a

written statement of the information required by the Branch and the plans and methods by which such information shall be provided to the Branch, including a schedule stating the dates by which such information shall be provided to the Branch. If USMCAS does not object to the requirements stated in such written statement within ten working days of receipt of the Branch's written statement containing such requirements, USMCAS shall expeditiously undertake and comply with all such requirements in accordance with the schedule for completion contained in such written statement. If USMCAS objects to any of the requirements contained in such written statement, USMCAS shall, within ten working days of receipt of the written statement from the Branch, submit a statement as to its understanding of the nature of the dispute, the technical bases for the dispute, USMCAS's position with regard to the dispute and the technical bases for the dispute, and the technical bases for concluding that USMCAS's position should be allowed. Upon receipt of USMCAS's timely and complete statement, the Branch shall evaluate USMCAS's position and within ten working days of receipt of the request, either advise USMCAS in writing that it accepts USMCAS's position or advise USMCAS in writing that it does not accept USMCAS's position. If the Branch does not accept USMCAS's position, the notice of such nonacceptance shall contain a statement of the Branch's understanding of the basis of the dispute, its technical position with regard to the dispute, and the bases for the Branch's conclusion that it cannot accept USMCAS's position. If the Branch and USMCAS do not agree, the Branch reserves its rights to pursue enforcement action pursuant to statute and rule against USMCAS and USMCAS reserves its rights to respond to such enforcement action.

13. This Consent Agreement will be signed on behalf of the USMCAS by Colonel R. D. Brown, Director of Installations and Logistics, of USMCAS, who warrants that he has the authority to enter this Consent Agreement on behalf of the USMCAS.

14. William L. Meyer has determined that this Agreement is in the furtherance of the public interest and will protect the public health and environment; and, with the consent and cooperation of USMCAS hereby orders USMCAS to do the following actions and USMCAS agrees to do the following actions:

1. By February 2, 1987, USMCAS will complete and report to the Branch the information required under Post-Closure Plan Section C of the First Notice of Deficiency, dated July 30, 1986, which is hereby incorporated by reference and attached hereto.
2. USMCAS will submit, in writing, monthly status reports, beginning September 30, 1986, which briefly summarize work completed to date.
3. The Branch shall perform necessary oversight and review activities to obtain compliance including inspecting the facility and reviewing records, upon reasonable notice to Gary Edwards.
4. The Branch shall designate one person as the primary contact for technical matters regarding implementation and compliance with this order. Ellen Pulaski, Solid and Hazardous Waste Management Branch, is hereby so designated.
5. USMCAS shall designate one primary contact for technical matters regarding implementation and compliance with this agreement. Gary L. Edwards is so designated.

IN WITNESS WHEREOF, the parties have executed this Agreement by their duly authorized representatives on the date indicated.

By: William L Meyer — 25 Aug 1986
William L. Meyer, Head — Date
Solid and Hazardous Waste Management Branch

By: R D Brown — 18 AUG 1986
Colonel R. D. Brown — (Date)
USMCAS
Director of Installations and Logistics

4675A

6240
NREAD
25 Sep 86

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

Subj: DRAFT HAZARDOUS WASTE MANAGEMENT PLAN AND USED OIL MANAGEMENT PLAN

1. Natural Resources and Environmental Affairs Division has been recently assigned responsibility for coordination of review of the subject plans. The plans are being prepared by EnSafe under contract #N62470-85-B-7979. Copies of the subject plans were provided to addresses several weeks ago by the Environmental Engineer for review and comment. Addresses are requested to provide representatives at a meeting scheduled for 0900 hours, 3 October, 1986 for the purpose of consolidating comments on the subject plans. The meeting will be held at Bldg. 1103.

2. Please advise this office as soon as possible of any significant problems which need to be resolved prior to the above addressed meeting. Point of contact is Mr. Danny Sharpe, 2083.

J. I. WOOTEN

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4WD-RM

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
~~AUG 4 4 1986~~

AUG 14 1986

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

Re: Hazardous Waste Inspection

Dear General Cassity:

On June 26 and 27, 1986, an inspection was conducted to determine whether Camp Lejeune was in compliance with its storage permit for hazardous waste, as well as general transporter and generator requirements for hazardous waste management. The enclosed report and inspection checklist indicates that Camp Lejeune is not in compliance with applicable requirements.

The violations in the enclosed report 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 Ellision at 404/347-7603.

Sincerely yours,

Allan E. Antley

Allan E. Antley, Chief
Waste Compliance Section
Residuals Management Branch
Waste Management Division

Enclosure

cc: William Meyer, NCDHS

RCRA SITE INSPECTION

1. Inspector and Author of Report

David G. Ellison
Environmental Engineer

2. Facility Information

U. S. Marine Corps Camp Lejeune (USMC)
NC Highway 24 & US Highway 16
Camp Lejeune, NC 28542
NC6 170 022 580

3. Responsible Official

Danny Sharpe
Head of Soil, Water and Environmental Branch

4. Inspection Participants

David Ellison, USEPA, Lead inspector
Jerry Rhodes, North Carolina Solid & Hazardous Waste Management Branch (NCSHWMB)
Bill Morris, NCSHWMB
Danny Becker, USMC
Danny Sharpe, USMC
Julian Wooten, USMC

5. Date and Time of Inspection

June 26-27, 1986 - 9:00 a.m.

6. Applicable Regulations

40 CFR Parts 262, 263, 264, and 265

7. Purpose of Survey

The Hazardous and Solid Waste Amendments of 1984 require an annual inspection of all federal facilities that treat, store, or dispose of hazardous waste.

8. Facility Description

The USMC base is located in Jacksonville, North Carolina. The base is the most complete amphibious training base in the world. The main mission of the base is to provide housing, training, logistic and administrative support for marine units, conduct specialized schools

and other training as needed, and receive and process personnel as assigned, and conduct combat training as needed. The facility was issued a hazardous waste Part B permit for storage in containers on September 7, 1984.

9. Findings

On June 26 and 27, 1986, an inspection was conducted at the USMC by EPA and the State of North Carolina. The USMC is a generator of hazardous wastes and stores hazardous waste in containers. The facility was issued a Part B permit for storage in containers on September 7, 1984.

The facility is operated by DRMO, who is responsible for the management of hazardous waste. The USMC is the owner of the facility who oversees the management of hazardous waste under the Natural Resource and Environmental Affairs Division. The Traffic Manager Officer (TMO) is responsible for the transportation of hazardous waste.

Hazardous waste is generated at approximately 60 sites (facility was unsure of the actual number) and then transported by TMO to the permitted storage area. The permitted storage area has two areas for storage of hazardous waste, buildings TP-451 and TC-863. The capacity in 55 gallon drums of the storage areas are: 224 drums in TP-451 and 504 drums in TC-863. The waste stored in the two storage buildings was in excellent condition. Hazardous materials are also stored in these two buildings. The following generating sites were inspected: B901, Ordnance Maintenance; B909, Motor Pool; and Building 915, Packing, Preservation, and Packing.

The USMC stores used batteries that are picked up by a reclaimer. The base drains batteries that are leaking and stores the electrolyte solution drained from the batteries in drums around the facility. The electrolyte solution is treated by the USMC. The electrolyte solution is a hazardous waste because it is corrosive (D002). Batteries drained are stored on pallets upside down on the ground and then are transported off-site by the reclaimer.

Safety Kleen currently services six sites where hazardous waste solvents are generated. The various tanks are serviced monthly by Safety Kleen. TMO is responsible for signing the manifest as the generator at the various sites. The base is currently considering the possibility of Safety Kleen servicing other areas at USMC base.

TMO is responsible for transporting all waste from the generating sites to the permitted storage buildings. The USMC is also a transporter of hazardous waste, and TMO is responsible for transporting the waste. TMO transports hazardous waste from the USMC Air Station - New River Base to the Camp Lejeune permitted storage buildings.

The USMC generates a large quantity of waste oil. The waste oil is stored at each generating site, then transported to one of four areas for storage before transportation to a burner. The waste oil has been sampled and hazardous waste, specifically halogenated solvents, has been detected.

The Assistant Chief of Staff of Facilities, Colonel T. J. Dalzell, was briefed on the violations found during the inspection. Attached is a copy of the inspection checklist. The following is a list of noncompliance items noted during the inspection:

40 CFR 262.21 - Manifest (Required Information)

On the February 28, 1986, manifest, no generator ID number was used as required.

40 CFR 262.34(a)(1) - Subpart I

This Section requires the facility to comply with Subpart I. The facility has failed to comply with Subpart I, specifically 40 CFR 265.174. At building 909, weekly inspections have not been performed. No inspections were performed for drums of electrolyte solution stored near building 909.

40 CFR 262.34(a)(2) - Accumulation Date

The facility has failed to mark on each container of electrolyte solution from batteries the date upon which each period of accumulation begins.

40 CFR 262.34(a)(3) - Labeling Containers

The facility has failed to label containers of electrolyte solution from batteries with the words "Hazardous Waste".

40 CFR 262.34(a)(4)

The facility has failed to comply with Subparts C and D in 40 CFR Part 265 and with 265.16 as specifically stated below:

40 CFR 265.16 - Personnel Training

None of the generators inspected had a personnel training plan. The generators failed to have the documents and records required by 265.16(d). The only record maintained was a log sheet showing the training an individual received. An adequate number of personnel were not trained at all generating sites. The generators need back-up personnel to manage the hazardous waste when the primary individual is on leave. TMO, who signs the manifest as the generator for Safety Kleen services, had no training plan and had an individual sign the manifest who had no hazardous waste training.

40 CFR 265.31 - Maintenance and Operation of Facility

The facility has not been maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste consitutents to air, soil, or surface water which could threaten human health or the environment. The USMC has placed batteries upside down on pallets on the ground. These batteries contain hazardous waste and the residue could leak out and possibly has at building 909 where the soil is discolored.

40 CFR 265 Subpart D - Contingency Plan

None of the generators had a contingency plan and this includes TMO. The contingency plan must meet the requirements of this section.

40 CFR 262.42(a) - Exception Reporting

On all manifests (six) for Safety Kleen Services, the USMC has failed to receive a copy of the manifest with the written signature of the owner of operator of the designated facility within 35 days and have failed to contact the designated facility and/or the transporter to determine the status of the hazardous waste.

40 CFR 262.42(b) - Exception Reporting

The facility has failed to submit an Exception Report for all the Safety Kleen Services where the USMC has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the transporter.

Permit Condition - Inspection Log

The USMC has changed the inspection log to a better form than what was in the permit. This form should be changed in the permit.

40 CFR 264.16 - Personnel Training

The facility has failed to revise the personnel training plan to show all individuals involved in hazardous waste. Several individuals have been added and received training in hazardous waste, but the training plan fails to recognize these positions.

Permit Condition - Container Storage

The permit requires drums be stacked no higher than two high. At the permitted storage buildings, boxes (crates) the same size as drums were stacked higher than two drums.

Permit Condition - Modification

The USMC has failed to notify the State that the operator of the facility has changed names from DPDO (Defense Property Disposal Officer) to DRMO.

10. Conclusions

The condition of containers and the handling of hazardous waste at the permitted storage buildings was excellent. The USMC has several minor violations that need to be corrected for the permitted site. The major problems, violations, were found at the generating sites. One of the major problems at the generating sites is the constant change of personnel. Due to constant change of personnel, it is difficult to adequately train the marines. The USMC have been exploring the possibilities of increasing the number of sites where a contractor would be servicing the various locations solvents are used. Some problems may be eliminated if a contractor handles the solvents. Another major problem the USMC has had is that solvents have been detected in the waste oil. If solvents continue to be detected in the waste oil, then the facility would be required to obtain a permit or handle the waste as a generator.

11. Recommendations

The contingency plan presented in the permit and approved when the permit was issued fails to address adequately all items that should be addressed. It is recommended that the contingency plan be revised to address the following comments:

- Pursuant to 40 CFR 264.52(e), the contingency plan should include a list of emergency equipment at the facility, the location of this equipment and a physical description of each item on the list, and a brief outline of its capabilities.

- Pursuant to 40 CFR 264.52(f), the contingency plan should include an evacuation plan for facility personnel where there is a possibility that evacuation could be possible.

- The contingency plan should outline the emergency procedures that will be followed as required in 40 CFR 264.56. The base contingency plan needs to be revised to outline in more detail the emergency procedures taken for an emergency. Specifically, the plan fails to address the following parts: 40 CFR 264.56 (d), (e), (h), (i), and (j).

The USMC needs to research and determine how solvents are being detected in the waste oil. The State and EPA will be investigating the waste oil practices at Camp Lejeune. If solvents continue to be detected in the waste oil, the waste oil must be handled as a hazardous waste.

Due to the violations found, a follow-up inspection is needed to ensure the items found in noncompliance during the inspection are corrected.

12. Recommended Enforcement Action

The State has the lead responsibility for taking enforcement action for the violations detected. The enforcement action must be taken in accordance with the Enforcement Response Policy.

13. Signed

David G. Ellison, Inspector — Date 8/4/86

14. Concurrence

Beverly J. Foster for
John C. Lank, Jr., Chief
East Unit, Waste Compliance Section
8/4/86

Allan E. Antley, Chief
Waste Compliance Section

Attachments

TSDF INSPECTION FORM - PART 264

USMC Camp Lejeune NC6170022580 On-site
Name of Site EPA I.D.

Jacksonville 6-26-86 David L. Allen
Location Inspection Date Signature of Inspector

Julian Woolard
Compliance Date Signature of Facility Conta

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART B - GENERAL FACILITY STANDARDS

1. Required Notices (264.12)
   - ___ foreign shipments (a) —
   - ___ off-site notification (b) —
   - ___ new owner/operator (c) —

2. General Waste Analysis (264.13)
   - ___ chemical/physical lab reports (a)(1) ✓
   - ___ review/repeat of analysis (a)(3)(4)
   - ___ inspect/analyze (a)(4) ✓
   - ___ analysis plan (b)(c) ✓

3. Security (264.14)
   (The facility may be exempt under (a)(1)(2)
   - ___ 24-hour surveillance system (b)(1) ✓
   - or
   - ___ artificial/natural barrier (b)(2)(i) ✓
   - and
   - ___ entry control (b)(2)(ii) ✓
   - ___ danger sign(s) (c) ✓

4. General Inspection Requirements (264.15)
   - ___ inspect for malfunctions, operator errors, discharges, etc. (a)(1)(2) ✓
   - ___ inspect monitoring, safety and emergency equipment, etc. (b)(1) ✓
   - ___ written schedule (b)(2)(3) ✓
   - ___ remedial action (c) ✓
   - ___ inspection log (d) ✓ changed from form in permit

5. Personnel Training (264.16)
   - ___ program completed (a)(1)(b)
   - ___ annual review (c) ✓
   - X documents/records (d)(e) See comments below

6. General Requirements for Ignitable, Reactive or Incompatible Waste (264.17)
   - ___ proper handling/"No Smoking" signs (a)(b) ✓
   - ___ documentation (c) ✓

SUBPART C - PREPAREDNESS AND PREVENTION

8. Required Equipment (264.32)
   - ___ communication/alarm system (a) ✓
   - ___ telephone or two-way radio (b) ✓
   - ___ fire, spill, and decontamination equipment (c)
   - ___ adequate pressure and volume of water/foam equipment (d) ✓

9. Testing and Maintenance of Equipment (264.33)
   - ___ as required ✓

10. Access to Communications or Alarm System (264.34)
    - ___ immediate (a)(b) ✓

11. Required Aisle Space (264.35)
    - ___ per permit condition ✓ double stacked pallets

12. Arrangement with Local Authorities (264.37) Base aut
    - ___ of changes with wastes characteristics (a)
    - ___ documentation of refusal (b)

SUBPART D - CONTINGENCY PLAN AND EMERGENCY PROCEDURES

13. Amendment of Contingency Plan (264.54)
    - ___ permit revision (a) ✓
    - ___ emergency failure (b) ✓ No changes
    - ___ facility design change (i.e. construction operation) (c)
    - ___ coordinators change (d)
    - ___ equipment change (e)

14. Emergency Coordinator (264.55)
    - ___ on call ✓
    - ___ authority to commit ✓ Fire chief on call 24hr/day

X 264.52 (e) - list of equipment

X 264.52 (f) - evacuation plan

Comment: not all positions listed with job description. Plan needs revision

15. Emergency Procedures (264.56)
- ___ activation of alarm system (a)(1) ✓
- ___ notification to State/Local agencies of discharge (a)(2), (d)(1)(2) ✓?
- ___ hazard assessment (c) ✓ NEEDS more Detail & explanations
- ___ reasonable prevention measures (e) ✓
- ___ monitor for leaks, pressure buildup, etc. (f) ✓
- ___ proper management of recovered waste, contaminated soil or surface water (g) ✓
- ___ compatibility with contaminated areas (h)(1) ✓
- ___ emergency equipment cleaned (h)(2) ✓
- ___ notification of compliance (i) ✓
- ___ written report (15 days)/operating record notation (j) ✓

SUBPART E - MANIFEST SYSTEM, RECORDKEEPING

16. Use of Manifest System (264.71)
- ___ sign, date (a)(1) ✓
- ___ note discrepancies (a)(2) ✓
- ___ copy to transporter (a)(3) ✓
- ___ copy to generator (30 days) (a)(4) ✓
- ___ TSDF copy (a)(5) ✓
- ___ rail or water transporter (b)(1)(2)(3)(4)(5) —
- ___ generator compliance (c) ✓

17. Manifest Discrepancies (264.72)
- ___ bulk discrepancies (a)(1) ✓
- ___ batch discrepancies (a)(2) ✓
- ___ written report, if required (b) ✓

18. Operating Record (264.73)
- ___ written (a) ✓
- ___ quantity, handling methods, dates (b)(1) ✓
- ___ location/quantity with cross reference (b)(2) ✓
- ___ waste analysis (b)(3) ✓
- ___ incident reports (b)(4) ✓
- ___ inspection record (b)(5) ✓
- ___ monitoring, testing results (for incinerators) (b)(6) ✓
- ___ notice to generators (b)(7) ✓
- ___ closure/post closure cost (b)(8) NA

19. Availability, Retention, and Disposition of Records (264.74)
- ___ access to records (a) —
- ___ retention (b) —
- ___ records submitted (c) —

20. Annual Report (264.75)
- ___ submit by March 1 (a)(b)(c)(d)(e)(f)(g)(h)

21. Unmanifested Waste Report (264.76)
- ___ within 15 days (a)(b)(c)(d)(e)(f)(g) ✓

22. Additional Reports (264.77)
- ___ Section 264.56(j) report (a) ✓
- ___ facility closure (c) ✓

SUBPART G - CLOSURE AND POST-CLOSURE

23. Closure Plan; Amendment of Plan (264.112)
- ___ written (a) ✓
- ___ inventory modification (a)(2) ✓
- ___ amendment (b) ✓
- ___ 180 day notice (c) ✓

24. Disposal or Decontamination of Equipment (264.1
- ___ equipment disposal/decontamination

25. Post-Closure Plan; Amendment of Plan (264.118)
- ___ written (a)
- ___ amendment/modification (b)(c)

A

SUBPART H - FINANCIAL REQUIREMENTS N/A Federal Facilit

26. Cost Estimate for Closure (264.142)
- ___ written (a)
- ___ anniversary adjustment (b)
- ___ change adjustment (c)
- ___ available for inspection (d)

27. Financial Assurance for Closure (264.143)
- ___ yes;

Specify form _____

28. Estimate for Post-Closure Care (264.144)
- ___ written (a)
- ___ anniversary adjustment (b)
- ___ change adjustment (c)
- ___ available for inspection (d)

29. Financial Assurance for Post-Closure (264.145)
- ___ yes;

Specify form _____

30. Liability Requirements (264.147)
- ___ sudden occurrences (a)
- ___ non-sudden occurrences (b)

31. Incapacity of Owners or Operators, Guarantors or Financial Institutions (264.148)
- ___ compliance (a)(b)

CONTAINER/TANK INSPECTION FORM - PART 264

USMC Camp Lejeune NC6170022580 6-26-8
Name of Site EPA I.D. Inspection Dat

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

1. Condition of Containers (264.171)
   - ___ leakage ✓
   - ___ past leakage (evidence) ✓
   - ___ severe rusting ✓
   - ___ structural defect ✓

2. Compatibility of Waste with Containers (264.172)
   - ___ visual evidence of noncompliance ✓ (leakage, corrosion)

3. Management of Containers (264.173)
   - ___ closed (a) ✓
   - X improper handling or storage (b) See below violation of permit condition

4. Inspections (264.174)
   - ___ weekly (minimum) ✓

5. Containment (264.175)

   "With Free Liquids"
   - ___ base (free of cracks or gaps) (b)(1) ✓
   - ___ run-on prevention (b)(4) ✓
   - ___ removal of spilled or precipitation (b)(5) ✓
   - ___ protect (c) ✓

   "No Free Liquids"
   - ___ contact with accumulated liquids (c)(2) ✓

6. Special Requirements for Ignitable or Reactive Waste (264.176) ✓
   - ___ 15m (50 ft)

7. Special Requirements for Incompatible Waste (264.177)
   - ___ mixing (a)
   - ___ unwashed container (b) ✓
   - ___ separation (c) ✓

SUBPART J - TANKS

1. General Operating Requirements (264.192)
   - ___ incompatible materials (a)(1)(2)
   - ___ overfilling prevention (b)(1)(2)

2. Inspections (264.194)
   - ___ overfilling control equipment (daily) (a)(1)
   - ___ monitoring data (daily) (a)(2)
   - ___ uncovered tank level (daily) (a)(3)
   - ___ above ground construction materials (weekly
   - ___ surrounding area (weekly) (a)(5)
   - ___ assessment of tank condition (b)
   - ___ spill response procedures (c)

3. Closure (264.197)
   - ___ residue removal
   - ___ decontamination

4. Special Requirements for Ignitable or Reactive (264.198)
   - ___ improper storage (a)(1)(2)(3)
   - ___ buffer (b)

5. Special Requirements for Incompatible Waste (264.199)
   - ___ mixing (a)
   - ___ unwashed tank (b)

6. Air Emissions (264.200)
   - ___ proper control equipment (a)(b)(c)

REMARKS: Permit condition - drums stacked only 2 high - boxes (empty) approximately same size as drums were stacked three high

DHS Form 3010 (Rev. 9-83)
SOLID & HAZARDOUS WASTE

GENERATOR INSPECTION FORM - PART 262

USMC Camp Lejeune NCD 6170022580 Q.S.
Name of Site EPA I.D. C

Jacksonville 6-26-86 David J Ellis
Location Inspection Date Signature of Inspect

Julian Woolen
Compliance Date Signature of Facility Co

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

1. Hazardous Waste Determination (262.11)
   - ___ Subpart D waste (b) -
   - ___ Subpart C waste (c)(1)(2) ✓

2. EPA Identification Numbers
   - ___ EPA generator number (a) ✓
   - ___ EPA transporter/facility (c) ✓

SUBPART B - THE MANIFEST

3. General Requirements (262.20)
   - ___ proper manifest (a) ✓
   - ___ permitted facility (b) ✓

   See comments

4. Required Information (262.21)
   - ___ document number (a)(1) ✓
   - X generator identification (a)(2) ✓ no ID # on 2/28/86 manifest
   - ___ transporter identification (a)(3) ✓
   - ___ facility identification (a)(4) ✓
   - ___ D.O.T. description (a)(5) ✓
   - ___ total quantity (a)(6) ✓
   - ___ certification (b) ✓

5. Number of Copies (262.22)
   - ___ minimum number ✓

6. Use of the Manifest (262.23)
   - ___ generator handwritten signature (a)(1) ✓
   - ___ transporter signature/date (a)(2) ✓
   - ___ retain copy (a)(3) ✓
   - ___ copies to transporter (b) ✓

SUBPART C - PRE-TRANSPORT REQUIREMENTS

7. Packaging (262.30)
   - ___ D.O.T. compliance ✓

8. Labeling (262.31)
   - ___ D.O.T. compliance ✓

9. Marking (262.32)
   - ___ D.O.T. compliance (a) ✓
   - ___ "HAZARDOUS WASTE" label (b) ✓

10. Placarding (262.33)
    - ___ D.O.T. compliance ✓

11. Accumulation Time (262.34)
    - X Subpart I; J (a)(1) -
    - X accumulation date (a)(2) ✓
    - X "Hazardous Waste" (a)(3) ✓
    - X Subpart C; D (a)(4)* -
    - X personnel training (a)(4)* -

*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

12. Recordkeeping (262.40)
    - ___ manifest retention (a) ✓
    - ___ annual/exception report (b) ✓
    - ___ test/waste analysis (c) ✓

13. Annual Reporting (262.41)
___ submitted (a)(1-6)
___ submitted (b)

14. Exception Reporting (262.42)
X transporter contact (a)
X exception report (b)(1)(2)

REMARKS: - No Hazardous Waste #'s on 6-6-86 manifes at permitted storage list
- Tmo signs Safety Kleen manifest as generator personnel have no formal training conducted recent no training plan, no contingency plan, one individual signing the manifest had received no training
- Building 909 - weekly inspections have not been pers there is no backup inspector (262.34 a(1)(i)
- No accumulation dates on hazardous waste label on drums of eletrolyte solution drained from batteries
- Batteries drained are stored inproper, batteries stored upside down on pallets
- All generating sites — inadequate personnel train no personnel training plan and no contingency pla this violates 262.34 (a)(4)

CONTAINER/TANK INSPECTION FORM - PART 265

USMC Camp Lejeune NC6170022580 6-26-8

Name of Site EPA I.D. Inspection Date

FOR GENERATING SITES

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

1. Condition Of Containers (265.171)
   - ___ leakage ✓
   - ___ past leakage (evidence) ✓
   - ___ severe rusting ✓
   - ___ structural defect ✓

2. Compatibility Of Waste With Containers (265.172)
   - ___ visual evidence of noncompliance ✓ (leakage, corrosion)

3. Management of Containers (265.173)
   - ___ closed (a) ✓
   - ___ improper handling or storage (b) ✓

4. Inspections (265.174)
   - X weekly (minimum)

5. Special Requirements For Ignitable or Reactive Waste (265.176)
   - ___ 15m (50 ft) ✓

6. Special Requirements For Incompatible Waste (265.177)
   - ___ mixing (a) ✓
   - ___ unwashed container (b)
   - ___ separation (c)

SUBPART J - TANKS

1. General Operating Requirements (265.192)
   - ___ compatibility (a)(b)
   - ___ uncovered tank precautions (c)
   - ___ overflow prevention (d)

2. Waste Analysis and Trial Tests (265.193)*
   *Section not applicable to a generator only
   - ___ waste analysis/trial test

3. Inspections (265.194)
   - ___ discharge control equipment (a)(1)
   - ___ monitoring equipment (a)(2)
   - ___ waste level (a)(3)
   - ___ construction material (a)(4)
   - ___ surrounding area (a)(5)
   - ___ assessment schedule/procedures (b)

4. Closure (265.197)
   - ___ plan on-site

5. Special Requirements For Ignitaole Or Reactive Waste (265.198)
   - ___ properly stored (a)(1)(2)(3)
   - ___ buffer requirements (b)

6. Special Requirements For Incompatible Wastes (265
   - ___ properly stored (a).
   - ___ tank washed (b)

REMARKS: _____

DHS Form 3010 (Rev. 9-83)
SOLID & HAZARDOUS WASTE

TRANSPORTER INSPECTION FORM - PART 263

USMC Camp Lejeune NC6170022580 Ons/04
Name of Site EPA I.D. County

Jacksonville 6-26-86 David L. Illeson
Location Inspection Date Signature of Inspector(s)

Compliance Signature of Facility Contac

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

1. EPA Identification Number (263.11)
   ___ yes (a)(b) ✓

2. Transfer Facility Requirements (263.12)
   ___ 10 days limit ✓

SUBPART B - MANIFEST SYSTEM/RECORDKEEPING

3. The Manifest System (263.20)
   ___ generator signature (a) ✓
   ___ transporter signature/date/copy (b) ✓
   ___ accompanying manifest (c) ✓
   ___ delivery compliance (d)(1)(2)(3) ✓
   ___ bulk shipment-water (e)(1)(2)(3)(4)(5) —
   ___ rail shipment (f)(1)(2)(3)(4) —
   ___ foreign shipment (g)(1)(2)(3) —

4. Compliance With The Manifest (263.21)
   ___ designated facility delivery (a)(1) ✓
   ___ alternate facility delivery (a)(2) ✓
   ___ designated transporter delivery (a)(3) ✓
   ___ designated foreign facility (a)(4) ✓
   ___ generator contact (b) ✓

5. Recordkeeping (263.22)
   ___ signed copies (a) ✓
   ___ bulk shipment-water (b) —
   ___ rail shipment (c)(i)(ii) —
   ___ foreign shipment (d) —
   ___ extended retention (e) ✓

SUBPART C - HAZARDOUS WASTE DISCHARGES

6. Immediate Action (263.30) NONE
   ___ immediate action (a)
   ___ notification (c)(1)(2)
   ___ water transporter notification (d)

7. Discharge Clean-Up (263.31) NONE
   ___ remedial action

REMARKS:

The Traffic Manager office (TMO) transports waste from Usmc Air Station New River to Camp Lejeune storage area.

DHS Form 3010 (Rev. 9-83)
SOLID & HAZARDOUS WASTE

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

6240
NREAD
10 Sep 86

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

Subj: INSPECTION REPORT ON LONG TERM HAZARDOUS WASTE STORAGE FACILITIES AT BUILDINGS TP-451 and TP-463

Ref: (a) Onsite inspection by Mr. Becker, NREAD, and Mr. Eggers, DRMO
(b) CG MCB ltr FAC/REA/hf 6280 of 15 Jul 83

Encl: (1) Inspection Checklist for Long Term Hazardous Waste Storage Facilities at Buildings TP-451 and TP-463

1. The enclosure provides results of reference (a) as required by refernce (b). It was noted that four hazardous waste labels did not have EPA ID nos. or EPA Waste nos. on them. This discrepancy was corrected on the spot. Point of contact in this matter is Mr. Danny Becker, NREAD, extensions 5003/2083.

J. I. WOOTEN
By direction

Copy to:
AC/S FAC
BFIRECHIEF
SJA
BMO
BSAFETYMGR

INSPECTION CHECKLIST FOR LONG TERM HAZARDOUS WASTE/MATERIALS STORAGE FACILITIES AT TP-451/TC/863

PARTICIPANTS Becker, Barbee, Eggers DATE: 10 Sept. 86

FACILITIES AND EQUIPMENT	SAT	UNSAT	COMMENTS
1. FACILITY GROUNDS	✓		
2. FACILITY SECURITY (LOCKS, DOORS, SIGNS, ETC.)	✓		
3. EMERGENCY TELEPHONE AND FIRE ALARMS	✓		
4. UNLOADING PAD DRAIN VALVE	✓		Dirt & Sediment needs to be cleaned out
5. EXHAUST FANS	✓		
6. INTERIOR LIGHTING AND ELECTRICAL OUTLETS	✓		
7. SAFETY SHOWERS/ EYE LAVAGES	✓		
8. CURBS, GRATES, OTHER FIXTURES	✓		
9. NON-SPARKING SHOVELS (2)	✓		
10. ABSORBENT (EQUIVALENT OF FOUR 55-GAL BARRELS)	✓		
11. HAZ MAT PUMPS OR EQUIVALENT	✓		
12. FIRE EXTINGUISHERS	✓		
13. PROTECTIVE GEAR AND EQUIPMENT	✓		
14. EMPTY CONTAINERS AND OVERPACK DRUMS	✓		

OPERATIONAL CONSIDERATIONS	SAT	UNSAT	COMMENTS
1. Required operator inspections and Inspection Log	✓		
2. Emergency Contingency Plan Posting & Operator Familiarity	✓		
3. Fire Department Phone number posting	✓		
4. Condition of containers in use	✓		
5. Presence of odors/vapors, residues in sumps, deck, etc.	✓		
6. Unloading Pad Valve Operation	✓		
7. Compatibility of Material Storage	✓		
8. Implementation of previously recommended corrective action	✓		
9. Facility Operators since last Inspection	✓		GEORGE EGGERS

ADDITIONAL COMMENTS, EXPLANATIONS, ETC:

~~Drum of linseed oil had spillage around top of drum~~

Operator ~~to~~ must ensure that Haz waste labels are visible from isles.

operator must ensure that Haz waste labels are completely filled out upon receipt

file DDS

DEPARTMENT OF THE NAVY
OFFICE OF INFORMATION
WASHINGTON, D.C. 20350

IN REPLY REFER TO
4602
OI-511
31 JAN 1985

MEMORANDUM FOR AREA COORDINATORS

Subj: PUBLIC AFFAIRS GUIDANCE--HAZARDOUS WASTE SITE CLEANUP

Ref: (a) OPNAVINST 5090.1

1. The Navy Assessment and Control of Installation Pollutants (NACIP) program detailed in reference (a), paragraph 11202.C, is a three phase nationwide process to identify Navy past hazardous waste sites and take necessary cleanup action. The first phase (Initial Assessment Study) is an exhaustive search of historical records, employee interviews, and surface observations, to determine what may have been dumped and where. In the second phase (Confirmation Study), the characteristics of the ground water, contamination (if present), and environmental effects are determined, and any necessary remedial measures recommended. The third and final phase (Remedial Action) consists of necessary clean up actions. The activity involved provides all studies to the Environmental Protection Agency (EPA) and state agencies, and their coordination and advice are sought before proceeding to the next phase.

2. Consistent with the policy of keeping legitimately interested parties informed, it is the policy of the Department of the Navy to provide completed studies to the media, as well as local organizations on request. In this regard, the following guidance is provided:

a. Completed studies should be released as soon as practical upon request. The activity CO, working with the area coordinator or his designated representative, is responsible for this release. Copies of studies are available from the activity which is the subject of the study.

b. CHINFO Plans and Policy Division (OI-5) (Commercial 202-697-7371/Autovon 227-7371) is to be informed of the release of these documents.

c. Commanders are encouraged to discuss NACIP studies and remedial cleanup with the media and local organizations within their areas of responsibility. The following points will be emphasized:

(1) The Navy is concerned about the environment. We will continue to pursue action to take remedial action to clean up pollutants.

(2) Past hazardous waste disposal methods, although acceptable at the time, have often caused problems as long term characteristics of pollutants and land disposal became known.

(3) State and local agencies will be notified promptly by local Navy officials if health, welfare or environmental problems are identified--even before publication of final technical reports.

(4) If an immediate hazard to human health or the environment is identified, remedial action will begin immediately.

3. Questions from the media or local organizations beyond this guidance or national in scope should be referred as follows:

a. Media queries to CHINFO News Desk (Commercial 202-697-5342/Autovon 227-5342).

b. Public affairs policy questions to CHINFO Plans and Policies Division (Commercial 202-697-7371/Autovon 227-7371).

JACK A. GARROW
Commodore, U. S. Navy
Chief of Information

Copy to:
CHINFOSTAFFINST 5216.1F, List D, Part 1
CNO
CMC
CHNAVMAT
COMNAVFACENGCOM
NORTHNAVFACENGCOM
CHESNAVFACENGCOM
LANTNAVFACENGCOM
SOUTHNAVFACENGCOM
WESTNAVFACENGCOM
PACNAVFACENGCOM
NAVENEVSA PORT HUENEME

File

U.S. Department of Transportation

Research and Special Programs Administration

HAZARDOUS MATERIALS TRANSPORTATION

DOT PENALTY ACTIONS RESULTING FROM VIOLATIONS OF HAZARDOUS MATERIALS REGULATIONS

The information contained in this publication summarizes penalty actions taken by agencies of the Department of Transportation in exercising their authority and responsibility for the enforcement of hazardous materials regulations. The penalty actions are grouped by the administration conducting the enforcement action, and each case contains the name of the shipper, carrier or person(s) involved; a description of the violations; reference to the regulations violated; and the penalty collected. **The penalties cited do not explain the mitigating or aggravating factors that, in accordance with the statutory assessment criteria, were considered in arriving at the final penalty, and account for penalty variations in cases that are somewhat factually similar.**

Penalties from cases closed during the period October 1, 1984 - September 30, 1985:

(FAA)	Air	-	$ 291,100
(FHWA)	Highway	-	404,925
(FRA)	Rail	-	476,050
(RSPA)	Intermodal	-	127,925
(USCG)	Water	-	104,100
		total	$1,404,100

The following regulations are the ones violated, and the appropriate parts and sections are cited in each case summary. Unless otherwise stated, all citations are from 49 Code of Federal Regulations (CFR). The regulations are:

- CFR, Title 14, Aeronautics and Space, Parts 1-199
- CFR, Title 33, Navigation and Navigable Waters, Parts 1-199
- CFR, Title 46, Shipping, Parts 1-199
- CFR, Title 49, Transportation, Parts 100-199 and 300-399
- International Civil Aviation Organization (ICAO) Technical Instructions for the Safe Transport of Dangerous Goods by Air

For questions concerning these actions, contact the following persons in the appropriate agency:

RSPA Rebecca Bentson (202) 366-4400 FAA Allan Horowitz (202) 267-3651
FHWA Kathleen Markman (202) 366-0834 FRA Daniel C. Smith (202) 366-0628
USCG Cmdr. C. A. Huber (202) 267-0495

OFFICE OF HAZARDOUS MATERIALS TRANSPORTATION July 1986

COMPANY	OFFENSE	PENALTY
AEROLINEAS ARGENTINAS (Carrier)	Transported dangerous goods by air that were not properly classified, documented, certified, described, marked, labeled and in condition for shipment and did not ensure that the shipment was properly marked, in violation of ICAO Technical Instruction Part 1-1.1.2 and 5-1.1.1.2. Case No. 83NE700073.	$ 1,000
AEROMEXICO (Carrier)	Transported aboard a passenger carrying aircraft packages containing radioactive materials with a transport index exceeding 3.0. Packages did not have the required label radioactive yellow-III when the packages could not be placed in the aircraft in accordance with the minimum separation distances prescribed. Material was not described and certified on the shipping paper. [171.2(a)(b); 175.3; 175.20; 175.30(a)(1)(2); 175.700(a)(2)(c); 175.701; 175.70(b)(2);] Case No. 82SN710234	$40,000
AIR FREIGHT FORWARDING CO. INC. (Freight Forwarder)	Failure to properly describe the material on the shipping papers, and to have required shipper's certification, including the following statement: This shipment is within the limitations prescribed for passenger aircraft/cargo-only aircraft. The package was not marked with the proper shipping name for its contents. [171.2(a); 172.200(a); 172.202(a)(1)(2)(3)(4); 172.204; 172.204(a)(c)(1)(3); 172.300; 172.301(a)]. Case No. 83SW700007.	$ 8,000
AIR PANAMA (Carrier)	Failure to list pertinent information regarding quantity and packaging group for a shipment of 59 Cartons of "Flammable liquid, N.O.S. on the shippers declaration for dangerous goods in violation of ICAO Technical Instructions Part 1 Chapter 1. Par. 1.2 and Part 5 Chapter 1 Par. 1.1.2. Case 84-48 HM, Concluded 3/14/85.	$ 4,500
AIR SEA BROKER, LTD. (Freight Forwarder)	Failure to mark the proper shipping name of the substance in english on the package or the transport document. Package was improperly labeled as specified in ICAO. Failure to affix to the package a "cargo aircraft only" label. Packaging did not bear durable and legible required markings in violation of the ICAO Technical Instructions Part 1 Chapter 1-1.2 and Part 4 Chapter 1-1.1(b)(c), 2-2.4.1, 2-2.5, 3-3.11, 3-3.2.8(b), 4-4.1.2, 4-4.1.8 and Part 7 Chapter 2-2.1(a)(b)(c)(e)(f)(g)]. Case No. 8450740037.	$ 2,000
A. L. OKUN CO., INC. (Shipper)	The words "Cargo-only aircraft" were not entered after the basic description on the shipping paper. Nor was the label "Cargo Aircraft Only" affixed to the package, nor was the limitation certification added. Package was not legibly marked as appropriate to indicate the upward position on the inside packaging. Failure to instruct each of its officers, agents, and employees having any responsibility for shipment as to the applicable hazardous materials regulations [171.2(a); 172.200(a); 172.202(a)(1)(2)(3)(4); 172.203(f); 172.204(a)(c)(3); 172.300; 172.301(a); 172.312(a)(12); 172.400(a); 172.402(6); 173.1(b)] Case No. 82EA710112.	$ 2,000
AMERICAN AIRLINES (Carrier)	Transporting an improperly labeled and described shipment of "Reuse solution flammable" in violation of ICAO Technical Instructions Part 1 Chapter 1-1.2; Chapter 3-3.1; Part 4 Chapter 3-3.1, 3.2.8(c), 3.4.1.1(d), 3.4.1.2; Part 4 Chapter 4-4.1.3(d). Case 85-2 HM, Concluded 9/10/85	$ 2,750
ARROW AIR (Carrier)	Transported 4 cartons containing dangerous goods without proper documentation and certification and without the proper shipping name and identification numbers displayed on the outside of the cartons, in violation of ICAO Technical Instructions Part 1, Chapter 1-1.2 and Part 5 Chapter 1-1.1.2(c). Case 84-53 HM, Concluded 4/5/85.	$ 1,000
BDP INT'L INC. (Shipper)	Offered for transportation by air seven packages containing poisonous liquids Class B, n.o.s. that were not marked with the proper shipping name nor did the package have the "cargo-only aircraft" labels as required [Section 171.2(a); 172.300; 172.402(b)]. Case No. 81EA-730067.	$ 5,000
CAM AIR INT'L, INC. (Carrier)	Transported aboard an aircraft a shipment of hazardous materials which was not properly classed, described, packaged, marked, labeled, and in the condition for shipment. Failure to thoroughly instruct its employee(s) in the requirements of the HMR. Carried a hazardous material on an aircraft contrary to the HMR. [171.2(a)(b); 175.20; 175.30(a)(2); 175.3; 175.75(a)(1)]. Case No. 84GL730016.	$ 8,000
CAM AIR INT'L, INC. (Carrier)	Utilized personnel for the performance of assigned duties and responsibilities in handling or carriage of hazardous materials, when said personnel had not satisfactorily completed an approved training program. [14 CFR 121.433(a)(b). Case No. 83GL730083.	$ 1,500

CATERPILLAR TRACTOR CO. **(Importer)**	Failure to provide the shipper and forwarding agent at place of entry into the U.S. of the requirements of the HMR for shipments into the U.S. As a result a consignment of 6 wet cell batteries were transported aboard passenger carrying aircraft instead of cargo aircraft only; shipping papers lacked the proper description and identification number of the commodity; improper packaging resulted in acid leakage and injury to a cargo handler. [Section 171.12(a).]. Case 85-6 HM, Concluded 12/13/85.	$ 500
CONTINENTAL AIRLINE **(Carrier)**	Transported an improperly described hazardous material as "Fuel Sample, Jet A, 1 Qt" when it should have been described under its proper shipping name "fuel aviation turbine engine" a flammable liquid, and packaged, handled and transported in accordance with the regulations governing that hazard class. [Section 171.2(a)(b); 173.3; 30(a)(2)(3); 33; 75(a)(1); 175.20]. Case 84-21 HM, Concluded 7/12/85.	$ 2,000
D.J. MAN **(Shipper)**	Offered for transportation by air a shipment which consisted of hot air balloon, gondola, burner and several tanks of propane gas that were improperly classed, described, packaged, marked, labeled, and in the required condition for shipment. Failure to affix "cargo aircraft only" label to package and papers. The valves were not provided with sufficient protection to prevent operation and damage to such valves during transportation. [171.2(a); 172.200(a); 172.202(a)(1)(2)(3)(4); 172.203(f); 172.204(a)(c)(1); 172.402(b); 173.1(b); 173.6(b)(6)] Case No. 82SW700036.	$ 250
DUTY FREE EXPO INC. **(Shipper)**	Failure to label a shipment of perfume with its proper shipping name of "Flammable Liquid, n.o.s.," [Section 172.300]. Case 83-58 HM, Concluded 12/4/85.	$ 1,000
EASTERN AIRLINES INC. **(Carrier)**	Transported aboard an aircraft a shipment of hazardous materials that were improperly described and labeled. The operator did not comply with all the regulations and did not thoroughly instruct his employee(s) in relation thereto. [171.2(a)(b); 175.3; 175.20] Case No. 82GL730085.	$ 350
ELE INT'L. LTD. **(Shipper)**	Markings on the packages were so placed that they were covered or obscured by an attachment to the packaging. Failure to display on each package the proper shipping name and assigned corresponding UN number of the dangerous goods. Improper transportation index was entered on each label in violation of ICAO Technical Instructions Part 1, Chapter 1-1,2 and Part 4, Chapter 2-2.1, 2-2.2, 2-2.4.1, 3-3.1, 3-3.4.1.1(e)(3). Case No. 83WP750284.	$10,000
FAIRCHILD REPUBLIC CO. **(Shipper)**	Incomplete shipping papers. Failure to affix cargo aircraft only labels to the shipment and failure to mark on overpack "inside packages comply with required specifications." Failure to instruct each of its officers, agents, and employees having any responsibility for shipment as to the applicable HMR. [171.2(a); 172.200(a); 172.202(a)(3); 172.204(c)(3); 172.402(d); 173.25(b)(3); 173.1(b). Case No. 82WP750103.	$ 3,000
FEDERAL EXPRESS **(Carrier)**	Accepted and transported dangerous goods for transportation by air that were improperly classified, documented, certified, described, packaged, marked, labeled and in the condition for shipment. Failure to enter on the air waybill the words "Dangerous Goods as per attached Dangerous Goods transport document." [171.2(a)(b); 175.3; 175.30(a)(3)]. Case No. 83SN710706. Case No. 84SW710221.	$ 2,800
FRANKLIN RESEARCH CENTER **(Shipper)**	Improperly labeled and described boxes of electric squib and fireworks as "Barium payload C/B explosives," which, through several additional repackagings and redescriptions lacked the notation "Cargo only aircraft" and was subsequently transported aboard a passenger carrying aircraft. [Section 172.200(a); 202(a)(2); 203(f); 204; 204(a)(c)(3); 300; 301(a) 400(a); 402(a)(b).] Case 81-212 HM, Concluded 2/15/85.	$ 4,000
GAF CORPORATION **(Shipper)**	Discrepancies in the Dangerous Goods transport document accompanying an improperly labeled and described shipment of "Resin solution flammable," in violation of ICAO Technical Instructions Part 1, Chapter 1-1.2; Chapter 3-3.1; Part 4, Chapter 3-3.1, 3.2.8(c), 3.4.1.1(d), 3.4.1.2, Part 4, Chapter 4-4.1.3(d). Case 85-4 HM, Concluded 8/15/85.	$ 3,000
GARY MCGARVIE **(Shipper)**	Failure to properly describe the material offered for transportation on the shipping papers, and to have the required shipper's certification. Failure to mark the package containing a chain saw with a fuel tank filled with gasoline with proper shipping name and identification number assigned to the material. Failure to properly indicate the upward position of the inside packaging, package was not labeled and the packaging did not conform to the specifications. Failure to package the container in accordance with the HMR resulting in a significant release of hazardous material to the environment. [171.2(a); 172.200(a); 172.202; 172.202(a)(1)(2)(3)(4); 172.204; 172.204(a)(c)(1)(3); 172.300; 172.301(a); 172.312(a)(2); 172.400(a); 173.3(a); 173.6(b)(1)94); 173.22(a)(1)(2)(i); 173.24(a)(1)(2); 173.120(b)]. Case No. 84NM710052.	$ 700

GATEWAY EXPRESS CO. (Freight Forwarder)	Quantity exceeded the maximum permitted for "acid, liquid, n.o.s." 49 CFR 172.101--9 counts. Case 82-171 HM, Concluded 6/15/84.	$ 7,500
GILLETTE COMPANY (Shipper)	Failure to remove inappropriate dangerous goods labels. Failure to affix the proper shipping name and identification number of the substance on the package. Failure to affix orientation label on two opposite vertical sides with arrows pointing in the correct direction. Failure to indicate on the dangerous goods document that transitional packaging arrangements had been used. Failure to establish and maintain an initial and recurrent dangerous goods training program on behalf of all its agents concerned in the transport of dangerous goods in violation of ICAO Technical Instructions Part 1 Chapter 1, Par. 1.1 and Part 4, Chapter 1, Par 1.1(b), 1-1.1(b); 2-2.1; 2-2.4.1; 2-2.4.3; 2-3.2.8(c); 4-4.1.6; 4-4.1.3(d); 1-1.1(a). Case No. 83SW700033. Case No. 83NE700071.	$ 5,000
C.L. HAUTHAWAY & SONS CORP (Shipper)	Failure to assign the proper shipping name to a 1 gallon metal container of cement offered for shipment. Failure to affix a "Cargo Aircraft Only" label to the shipment and failure to mark the upward position of the package. [Section 171.202(a)(1); 172.300; 301(a); 312(a)(2); 402(b).]. Concluded 12/9/85.	$ 1,000
HEWLETT PACKARD CO. (Shipper)	Shipped a package of sulphuric acid by air without the proper shipping name and identification number prescribed by the ICAO affixed to the package in violation of ICAO Technical Instruction--9 counts. Case 84-37 HM, Concluded 8/20/85.	$ 1,500
JACKSON, KIDDER & SUCKLING (Shipper)	Failure to properly describe the material on shipping papers. Failure to enter after the basic description on the shipping papers the words "cargo-only aircraft." Failure to mark the package with the proper shipping name for its contents and to indicate the upward position of the inside packaging. Failure to instruct each of its officers, agents, and employees having any responsibility for shipment as to the applicable HMR. [171.2(a); 172.200(a); 172.202(a)(1)(2)(3)(4); 172.203(f); 172.204; 172.204(a)(c)(1)(3); 172,300; 172.301(a); 172.312(a)(2); 172.400(a); 172.402(b); 173.3(b), 173.1(b)]. Case No. 83WP710283.	$ 2,500
KARR ELLIS & CO. (Agent)	Accepted from GAF Corporation and offered for transport by American Airlines an improperly labeled and described shipment of "Resin solution flammable" in violation of ICAO Technical Instruction Part 1 Chapter 1-1.2; Chapter 3-3.1; Part 4 Chapter 3-3.1, 3.2.8(c), 3.4.1.1(d), 3.4.1.2; Part 4 Chapter 4-4.1.3(d). Case 85-3 HM, Concluded 8/6/85.	$ 3,500
LEP TRANSPORT (Agent)	Accepted from Vestal International and offered for air transportation by Air Canada, a package of improperly marked, packaged, labeled and described corrosive liquids N.O.S. which exceeded the maximum amount allowable per package for air transportation. [Section 171.11(a); ICAO Technical Instructions Part 1, 1.2; Part 2, 11.2; Part 3, 1.1.12, 1.3; Part 4, 2.4.1, 3.1.1, 3.2.8(b), 4.1.2]. Case 84-34 HM, Concluded 2/12/85.	$ 8,500
LONE STAR HELICOPTERS (Shipper)	Shipping papers lacked the proper certification and proper shipping name for a shipment of electric squib. Failure to properly instruct its employees and agents having responsibility for shipment in the applicable hazardous materials regulations [Section 172.200(a); 202; 202(a)(2)(4) 204; 204(a)(c)(3); 300; 301(a); 400(a); 173.1(b)]. Case 85-30 HM, Concluded 11/21/85.	$ 3,000
MCI TELECOMMUNICATION (Shipper)	Failure to properly class and describe the material on shipping paper. Failure to add to the certification the following statement: This shipment is within the limitations prescribed for passenger aircraft/cargo-only aircraft. [171.2(a); 172.200(a); 172.202; 172.202(a)(1)(2)(3)(4); 172.204; 172.204(a)(c)(1)(3)]. Case No. 84WP760011.	$ 5,000
MEDI-PHYSICS INC. (Shipper)	Failure to enter on the air waybill the words "Dangerous Goods as per attached Dangerous Goods transport document." Failure to properly mark the materials as required by HMR and failure to include the transport index on the radioactive label, as required. [171.2(a), 172.403(g)(3)]. ICAO Part 4, Chapter 4 Para. 4.3.1(b); Chapter 3 Para. 3.4.1(c)(3)> Case No. 83SW710705. Case No. 84SW710220.	$ 3,500
MORRISON-KNUDSEN INTERNATIONAL, CO. (Shipper)	Radioactive material shipment exceeded quantity authorizedfor air; Lacked proper certificate; Passenger aircraft not authorized--33 counts. Case 82-111 HM, Concluded 3/29/84.	$14,000

NEW YORK DAILY NEWS (Shipper)	Offered shipment of electron tubes classified as ORM for transportation Packaging was not marked on at least one side or end with the appropriate ORM designation immediately following or below the proper shipping name of the material. Failure to indicate the upward position of the inside packaging. Failure to instruct each of its officers, agents, and employees having any responsibility for shipment as to the applicable HMR. Inner breakable container were not packaged to prevent breakage and leakage under conditions normally incident to transportation. [171.2(a); 172.200(a); 172.202; 172.202(a)(1)(2)(3)(4); 172.204; 172.204(a)(c)(1)(3); 172.300; 172.301(a); 172.312(a)(2); 173.1(b); 173.6(b)(2); 173.24(a)(1); 173.860(c); 172.316]. Case No. 84GL730095.	$ 4,000
OZARK AIRLINES (Air Carrier)	No shipper's certification--3 counts. Case 82-106 HM, Concluded 7/30/84.	$ 3,500
OZARK AIRLINES (Carrier)	Transported aboard an aircraft a shipment of hazardous materials which was not within the quantity limitations specified for carriage aboard aircraft. Failure to describe and certify the material on a shipping paper. Failure to report a discrepancy and to notify the nearest FAA air transportation security office as soon as practicable. [171.2(a)(b); 175.3; 175.20; 175.30 (a)(1)(2)(4); 175.31; 175.35(a); 175.75(a)(1)]. Case No. 84CE73001.	$17,000
PENNWALT CORP. (Shipper)	Shipment improperly packaged, labeled, marked, and certified, and resulted in an incident--15 counts. Case 83-76 HM, Concluded 2/6/84.	$ 5,000
PUROLATOR COURIER CORP (Carrier)	Failure to include the additional description and certification requirements for radioactive materials shipments. Failure to mark the container in which the package of radioactive material was placed with the proper shipping name for its content and for not plainly and durably marking the outside of the plastic bag containing the package of radioactive material with the words "Type A" in letters at least 1/2 inch high. Improperly affixing two radioactive Yellow II labels to the opposite sides of the plastic bag containing the package of radioactive material also not entering in blank spaces on radioactive labels the name of the radionuclide, the number of curies, and the transport index. Failure to indicate the upward position of closures, and omitting the certification "inside packages comply with prescribed specifications." [171.2(a); 172.200(a); 172.202(a)(1)(2)(3)(4); 172.203(d)(i)(ii)(iii)(iv)(v); 172.204(a)(c)(1)(3)(4)(d); 172.300; 172.310(a)(2); 172.400(a); 172.403(c)(f); 172.406(a); 172.403(g)(1)(2)(3); 173.393(r)(2)(1)(ii); 173.25(a)]. Case No. 825074242.	$20,000
SAM AIRLINES (Carrier)	Accepted for shipment and transported aboard an aircraft a 55 gallon drum of mercaptopropionic acid which was improperly classified described, packaged, marked and labeled, was not authorized for transportation aboard aircraft and was not within the quantity limitations specified for carriage aboard aircraft. [Sections 171.2(a)(b); 175.3,20, 30(a)(1)]. Case 82-136 HM, Concluded 12/10/84.	$ 1,000
SCHLUMBERGER (Shipper)	Failure to mark, label, and accurately describe a package containing 31 kilograms of poisonous solid, N.O.S. with its proper shipping name and UN identification number, [Section 171.11 and ICAO Technical Instruction Part 4, Chapter 2-2.4.1,.3; Chapter 3-3.2.8; and Chapter 4-4.1.2.]. Case 85-2 HM, Concluded 11/20/85.	$ 2,000
SPHERE OVERSEAS SUPPLY (Shipper)	Failure to securely package and brace for shipping 4 containers of ammonia solution resulting in leakage from 2 of the containers during flight, in violation of ICAO Technical Instructions Part 1 Chapter 1-1.2; Part 3, Chapter 3-1.1.9. Case 83-133 HM, Concluded 5/16/85.	$ 500
SYSTEMS SCIENTIFIC LABORATORIES, INC. (Shipper)	Shipped a package containing a mark II alloy detection kit with shipping papers lacking required shipper's certification that shipment is within the limitations prescribed for passenger aircraft/cargo-only aircraft. Package was not marked with the proper shipping name for its contents. Failure to instruct each of it officers, agents, and employees having any responsibility for shipment as to the applicable HMR. [171.2(a); 172.200(a); 172.202(a)(1)(2)(3)(4); 172.204(a)(c)(1)(3); 172.300; 172.301(a); 172.400(a); 173.1(b)]. Case No. 83NE700034.	$ 1,000
TRANSAMERICA AIRLINES (Carrier)	Transported an excess weight rocket motor from Newark, NJ to Cayenne, French Guiana contrary to the terms of DOT Exemption 9101 granted to the shipper, RCA. Shipment was therefore in violation of the 49 CFR, Sections 106, 107, 171.2(a)(b), 101; 172.101; 175.3, 20,30,75(a)(1).	$60,000

VENEZUELAN INT'L AIRWAYS (Carrier)	Accepted an overpack containing dangerous goods for transport aboard an aircraft and did not ensure that the shipment was properly marked or labeled. Failure to have an established initial and recurrent dangerous goods training program for all persons concerned in the transport of dangerous goods in violation of ICAO Technical Instruction Part 1-1.1.2 and 5-1.1.12, 6-1.1.1(b).	$ 5,500
VESTAL INTERNATIONAL (Shipper)	Shipped via its agent LEP Transport, a package of corrosive liquids, N.O.S. which was improperly marked, packaged, labeled and described as required and exceeded the maximum amount allowable per package for air transportation. 49 CFR 171.2(a)&(c) and 171.11. ICAO Parts 1.,1.2;2,11.2;3,1.1.12;3, 1.3;4, 2.4.1;4,3.1.1. Case 84-33 HM, Concluded 2/12/85.	$ 900
WESTERN AIRLINES (Carrier)	Transported, as checked baggage, a wheelchair equipped with a wet electric storage battery. Failed to secure the battery and the wheelchair in a manner that would prevent movement during flight which may have prevented the subsequent leakage of 4-5 ounces of acid from the battery. [Section 171.2(a)(b); 173.250(b); 175.10(a)(20); 175.81(a). Case 84-57 HM, Concluded 3/15/85.	$ 3,500
WIDGER CHEMICAL CORP. (Shipper)	Shipped 8 drums of "Compound Vehicle Body Sealer or Sound Deadener" which exceeded the amount authorized for carriage aboard aircraft under its proper shipping name of "flammable liquid N.O.S." Shippers certification carried an erroneous description and identification number. Shipper failed to instruct its employees and agents as to the applicable hazardous materials regulations. [Section 171.2; 172.101, 202(a)(1)(2)(3), (b); 173.1(b), 27(a)]. Case 84-58 HM, Concluded 5/16/85.	$ 4,000
WORLD AIRWAYS (Carrier)	Improperly certifying that a shipment described as "Frozen Meat Carbon Dioxide Solid 200 lbs Dry Ice" and transported by air, was not restricted for air transportation. Shipping papers lacked proper shipping name and identification number. Shipper failed to instruct the pilot prior to take off of the presence of a hazardous material and its location in the aircraft [Section 171.2(a)(b); 175.3; 20; 33]. Case 84-62 HM, Concluded 9/3/85.	$ 4,500
WORLD WIDE MARKETING GROUP (Shipper)	Offered dangerous goods "Perfumery Products Flammable hazard class 3" for transportation by air without proper transport documents, in violation of ICAO Technical Instructions Parts 1,3,4. [Section 171.11]. Case 84-40 HM, Concluded 1/10/85.	$ 350
	FAA TOTAL	$291,100

FEDERAL HIGHWAY ADMINISTRATION

A & A WASTE OIL CO., INC. (Carrier)	Failing to maintain proof of required financial responsibility at carrier's principal place of business. Transporting haz. mat. in commerce which was not handled or transported in accord w/required provisions of DOT packaging exemption. Using driver not medically examined and certified as physically qualified. Failure to require driver to prepare vehicle inspection report. 49 CFR 387.7--1 count 49 CFR 171.2--1 count 49 CFR 177.804 & 391.45--1 count 49 CFR 177.804 & 396.11--1 count. Concluded: 6-27-85	$ 3,500 + Consent Order
ADVANCE TRANSPORTATION COMPANY (Carrier)	Failing to mark vehicle w/an ID # when transporting portable tank marked with/an ID No. and the portable tank is not visible. Failure to have placards for the HM affixed to vehicle. 49 CFR 177.802 & 172.326(d)--1 count 49 CFR 177.823-172.506(a)--1 count. Concluded: 7-30-85	$ 3,000
AIRCO, INC. (Carrier)	Offering for transportation haz. mat. in prohibited loading combination. 49 CFR 177.848--4 count. Concluded 6-26-85.	$ 2,800
ALGER OIL CO., INC. (Carrier)	No required medical certificate on file. 49 CFR 391.51(b)(1)--1 count Failure to maintain a cargo tank certificate or manufacturer's data report. 49 CFR 177.814(a)--2 count. Concluded 4-11-85.	$ 1,500
AZS CORPORATION (Carrier)	Drivers not medically examined and certified 49 CFR 177.804 & 391.45. Concluded 1-10-85.	$ 2,000
ANDERSON HICKEY CO. (Shipper)	No hazardous waste manifest 49 CFR 172.205(a); Incorrect/missing labels 49 CFR 172.400(a). Concluded 10-16-84.	$ 2,000
ANR PIPELINE CO. (Carrier)	Failing to properly describe hazardous materials on shipping paper. 49 CFR 172.202(a)--1 count Failing to mark proper shipping name on package containing hazardous materials. 49 CFR 172.301(a)--1 count. Concluded 5-28-85.	$ 4,000
APACHE CHEMICAL, INC. (Carrier)	Unauthorized and leaking cargo tank 49 CFR 177.802, 173.33, & 173.24]; Improperly prepared shipping paper 49 CFR 177.817]; No placard 49 CFR 177.823. Concluded 2-15-86.	$ 5,000

ARNCO MOTOR LINES, INC. (Carrier)	Non-compatibility/loading of a poison with an edible material 49 CFR 177.841(e).	Consent Order
ARROW BUTANE-PROPANE CO. (Carrier)	Driver not medically examined and certified 49 CFR 177.804. Concluded 3-5-85.	$ 2,000
AYOR TRUCK LINE, INC. (Carrier)	49 CFR 177.804 & 391.51--Failing to maintain complete driver qualification file for each driver--6 counts. Concluded 7-23-85.	$ 3,500
B-LINE TRUCKING, INC. (Carrier)	Operating cargo tank without pressure-actuated venting. Operating cargo tank without operable remote emergency discharge device. 49 CFR 178.342-4(c) --1 count 49 CFR 178.343-5(b)--3 counts. Concluded 6-28-85.	$ 3,000
BECKHAM PETROLEUM COMPANY (Carrier)	Failing to require driver to prepare vehicle inspection report. Failing to maintain cargo tank certification or manufacturer's data report at principal office. Failing to maintain proof of required financial responsibility at principal place of business. 49 CFR 396.11(a) 177.804 --1 count 49 CFR 177.814(a)--2 counts 49 CFR 387.7(d)--1 count. Concluded 7-30-85	$ 500 + Consent Order
BERG CHEMICALS CO., INC. (Carrier)	Shipment lacked identification numbers, labels, and proper shipping name 49 CFR 177.801; Improper blocking/bracing 49 CFR 177.834; Disabled vehicle not moved to safe area 49 CFR 177.854.	Consent Order
BIG STATE FREIGHT LINES (Carrier)	Failing to placard vehicle transporting hazardous materials. Failing to maintain in operable condition all brakes on vehicle used to transport hazardous materials. 49 CFR 177.823--1 count 49 CFR 177.804 & 393.48--1 count. Concluded 5-16-85.	$ 3,000
HENRY D. BOHANNON (Driver)	49 CFR 172.500 & 172.504 (see 49 CFR 172.522)--Transporting class A explosives in vehicle without placards on each side & each end of vehicle.--1 count. 49 CFR 177.804 & 397.5(a)--Failing to attend vehicle containing class A explosives.--1 count 49 CFR 177.804 & 397.17(a)(1) & (3)--Permitting vehicle containing class A explosives to be parked on or within 5 feet of traveled portion of public street or highway and within 300 feet of a dwelling, building, or place where people work, congregate, or assemble.--1 count 49 CFR 177.804 & 397.11(b)--Permiting vehicle containing class A explosives to be parked within 300 feet of open fire.--1 count. 49 CFR 177.804 & 397.9 --Failing to operate vehicle containing class A explosives over routes set forth in written route plan so as to not go through or near heavily populated areas.--1 count. Concluded 4-25-85.	$ 600 (originally suspended pending driver returning to work--penalty was paid in 3 installments 1985 & 1986)
BRANDON, BILLY (Driver)	Making false entries on driver's record of duty status when transporting hazardous materials in interstate commerce. 49 CFR 177.804 & 395.8--2 counts Concluded 5-8-85.	$ 50
BROWNING-FERRIS IND., CHEMICAL SERVICES, INC. (Carrier)	Exemption violation - erroneous data and unauthorized container 49 CFR 171.2(d)(2); 49 CFR 177.802, 173.33, and 178.340-8(a)(3). Concluded 2-25-85.	$ 4,000
CHANEY OIL COMPANY OF VICKSBURG, INC. (Carrier)	No driver qualification file 49 CFR 177.804 & 391.51; Trailer brakes inoperable on all wheels 49 CFR 177.804 & 393.42]; Driver not required to prepare duty status record [Sec. 177.804 & 395.8]; No cargo tank certificate or manufacturer's data report at office 49 CFR 177.814; Cargo tank inspection overdue 49 CFR 177.824]. Concluded 2-25-85.	$ 4,000
CHEM-TRUCK, INC. (Carrier)	Failing to maintain the cargo tank certificate or manufacturer's data report 49 CFR 177.814--1 count. Requiring/permitting a driver used to transport hazardous materials to make false entries on daily logs. 49 CFR 177.804 & 395.8--3 counts. Concluded 4-17-85.	$ 3,500
CHEMICAL LEAMAN TANK LINES, INC. (Carrier)	Container weld failure with significant hazardous materials released 49 CFR 177.801, 173.24, and 173.33; Cargo tank inspection overdue 49 CFR 177.824. Concluded 11-14-84.	$ 4,500
CHEMICAL PACKAGING CORPORATION (Carrier)	Failing to properly prepare shipping paper and failing to make required shipper's certification on shipping paper. 49 CFR 172.202 & 172.204--2 counts. Concluded 8-6-85	$ 1,250
CIABATONI, DENNIS A. (Driver)	Making false entries on driver's daily logs on days during which hazardous materials were transported--2 counts. Concluded 4-23-85.	$ 250
CIBRO GASOLINE CORP. a.k.a. Cibro Petroleum Products (Carrier)	Driver not medically examined and certified 49 CFR 177.804 & 391.45; No cargo tank certificate or manufacturer's data report at office 49 CFR 177.814. Concluded 12-3-84.	$ 2,500

COLUMBIA GAS TRANSMISSION CORPORATION (Carrier)	Transporting HM in unauthorized container. 49 CFR 173.33--2 counts. Concluded 9-20-85	$ 2,000 + Consent Order
CONSOLIDATED FREIGHTWAYS CORP. OF DELAWARE (Carrier)	Unattended motor vehicle containing Class B explosives 49 CFR 177.804 & 397.5.	$ 1,000
COUNTY TANK LINES, INC. (Carrier)	Using unauthorized cargo tank for transportation of flammable liquid. 49 CFR 173.33(b)--4 counts. Concluded 7-5-85.	$ 5,000
CRAIG SUPPLY CO., INC. (Shipper)	Shipping paper did not have: the proper shipping name 49 CFR 177.817 & 172.202(a)(1), the identification number 49 CFR 177.817 & 172.202(a)(3), and the letters "RQ" 49 CFR 177.817 & 172.203(c)(2). Concluded 12-17-84.	$ 3,000
C W TRANSPORT, INC. (Carrier)	Transporting hazardous materials without properly prepared shipping paper. Transporting poison and foodstuffs in same vehicle. 49 CFR 177.817(a)--1 count. 49 CFR 177.841(e)--1 count. Concluded 9-16-85	$ 1,500
DAVIS, RUSSELL WENDELL (Driver)	Failing to properly mark & placard cargo tank having more than one compartment with appropriate ID No. for hazardous material being transported. 49 CFR 172.328--1 count. Concluded 5-17-85.	$ 150
DEALTON BRADLEY WESTFALL (Driver)	False entries on record of duty status. 49 CFR 177.804 & 395.8(e)--1 count. Concluded 8-7-85	$ 250
DELAWARE CONTAINER CO., INC. (Carrier)	Did not investigate driver employment record 49 CFR 177.804 & 391.23]; Did not maintain driver's: certificate of medical examination 49 CFR 177.804 & 391.51(b)(1), road test, certificate or license [Sec. 177.804 & 391.51(c)(4)], and written examination 49 CFR 177.804 & 391.51(c)(5). Concluded 10-12-84.	$ 8,000
DELTA MARINE SUPPLY CORP. (Shipper)	Improperly prepared shipping paper 49 CFR 177.817(a). Concluded 8-22-84.	$ 3,000
DYCE CHEMICAL, INC. (Carrier)	Transporting hazardous materials not in proper condition for transportation. 49 CFR 177.801 Concluded 7-22-85	$ 1,000
EDWARDS OIL CO., INC. (Carrier)	Driver did not prepare/submit a daily log 49 CFR 177.804 & 395.8], and vehicle inspection report 49 CFR 177.804 & 396.11; Cargo tank certificate or manufacturer's data report not on file 49 CFR 177.814; Improper placards 49 CFR 177.823; Cargo tank inspection overdue 49 CFR 177.824. Concluded 7-13-84.	$ 8,000
ENVIRITE CORP. (Carrier)	Improper description on manifest 49 CFR 172.205(a); No driver's qualification file 49 CFR 177.804 & 391.5(a); No cargo tank maintenance records 49 CFR 177.804 & 396.3(b); Nor inspection report 49 CFR 177.824(b). Concluded 11-23-84.	$ 4,000
FACTORY AND STEEL TRANSPORTATION, INC. (Carrier)	Permitting vehicle to travel through tunnels 49 CFR 177.804 & 397.9. Concluded 3-18-85.	$ 2,000
FISHER SCIENTIFIC COMPANY (Shipper)	Hazardous material not readily accessible 49 CFR 173.30 & 177.834. Concluded 2-26-85.	$ 3,500
FLAGER, HOWARD W. (Driver)	Failed to placard when required 172.504 operating a motor vehicle carrying hazardous material in violation of the Colorado State traffic regulations. 49 CFR 177.804/392.2--1 count. Concluded 4-16-85.	$ 100
FUEL TRANSPORTATION CO., INC. (Carrier)	Requiring/permitting driver to falsify duty status records 49 CFR 177.804 & 395.8. Concluded 8-20-84.	$17,000
GALAVIS, LOUIS JR. (Driver)	Remaining on duty more than 70 hours in 8 consecutive days. 49 CFR 177.804 /393.3(b)--2 counts. Concluded 4-17-85.	$ 250
GARDEN STATE PROPANE GAS CORP. (Carrier)	Shipping paper did not show hazard class or identification number 49 CFR 177.817--1 count. Concluded 4-19-85.	$ 1,000
GEORGE WORTHINGTON COMPANY (Shipper)	Failing to enter proper and complete description of haz. mat. on shipping paper. 49 CFR 172.202--6 counts. Concluded 8-20-85	$ 6,000
GIANT INDUSTRIES, INC. (Carrier)	Failing to maintain cargo tank certificate or manufacturer's data report at approved location. Failing to maintain cargo tank retest & inspection reports in same file w/mfr's certification or data reports. 49 CFR 177.814(a) --4 counts. 49 CFR 177.814(d)--4 counts. Concluded 9-27-85	$ 6,000
GREYHOUND LINES, INC. (Carrier)	Transporting hazardous materials without a shipping paper. 49 CFR 177.817(a)--1 count Transporting hazardous materials on a passenger-carrying vehicle. 49 CFR 177.870(b)--1 count. Concluded 4-19-85.	$ 3,000

HALLIBURTON SERVICES (Carrier)	Improper placard 49 CFR 177.823 and improperly prepared shipping paper 49 CFR 177.817. Concluded 3-18-85.	$ 2,250
HAYCOCK DISTRIBUTING CO., INC. (Carrier)	No driver's qualification file 49 CFR 177.804 & 391.51(a)]; Cargo tank certificate or manufacturer's data report not on file 49 CFR 177.814(a). Concluded 12-12-84.	$ 2,000
HEATER OIL CO., INC. (Carrier)	Failure to have cargo tank certificate or manufacturer's data report at carrier's principal office or other approved location (no reports). Failure to have cargo tank retest and inspection report. (no reports). 49 CFR 177.814--2 counts. 49 CFR 177.814(d)--1 count. Concluded 4-17-85.	$ 2,500
HIGH SPEED OIL CO. (Carrier)	Failing to maintain complete driver qualification file. 49 CFR 177.804 & 391.51--1 count Failing to maintain cargo tank certificate or manufacturer's data report at carrier's principal office. 49 CFR 177.814(a)--3 counts Failing to visually inspect cargo tank at least once in every 2-year period. 49 CFR 177.824(b)--1 count. Concluded 5-15-85.	$ 4,000
HIGHWAY OIL, INC. (Carrier)	Failing to perform required visual inspection of cargo tank at least once every 2 year period. Concluded 7-17-85.	$ 3,000
HIGHWAY PIPELINE TRUCKING CO. (Carrier)	Drivers falsified duty status record/daily log 49 CFR 177.804 & 395.8. Concluded 1-10-85.	$ 7,500
HONOLULU FREIGHT SERVICE (Freight Forwarder)	Poison label material loaded in same container with food stuffs intended for humans or animals 49 CFR 177.841(e)--1 count. Concluded 4-17-85.	$ 2,500
HYSAN CORPORATION (Shipper)	Offering hazardous materials for transportation in unauthorized packaging. 49 CFR 171.2(a), 173.256 & 173.264(a)(18)--1 count. Concluded 7-3-85	$ 3,000
INDUSTRIAL SOLVENTS AND CHEMICAL CO. (Carrier)	Transporting hazardous materials in MC-306 cargo tank w/inoperative internal valve or inoperative remote control. 49 CFR 177.804 & 178.341.5(a)--2 counts Failing to have cargo tank certificate or manufacturer's data report as required. 49 CFR 177.814 Failing to have in carrier's file written report of last required 2-year visual inspection of cargo tank. 49 CFR 177.824 Failing to retain minimum records pertaining to inspection, repair, and maintenance of motor vehicles. 49 CFR 396.3(b) Concluded 6-3-85	$ 3,000
INTERNATIONAL CHEMTEX CORP. (Shipper)	Offering improperly packaged hazardous material for transportation. 49 CFR 171.2--1 count. Concluded 9-9-85	$ 1,000
ISLAND TRANSPORTATION CORP. (Carrier)	Cargo tank violations: Not marked with permanently affixed metal identification plate 49 CFR 173.33 & 178.340-10 and -10(b); Air hoses improperly secured 49 CFR 393.45(a)(4); No stopped vehicle warning devices 49 CFR 393.95(f)(2); Not inspected and maintained in safe operating condition 49 CFR 396.3(b); Manhole closure not fully closed and secured 49 CFR 177.837(e)(1). Concluded 2-15-85.	$ 5,000
JONES CHEMICALS, INC. (Shipper)	Offering for transportation hazardous materials in non-specification (non-reconditioned) drums as container. 49 CFR 173.265(d)(3)--2 counts Concluded 5-2-85.	$ 4,800
KENAN TRANSPORT CO., INC. (Carrier)	Requiring/permitting driver to make false entries upon a record of duty status. 49 CFR 177.804/395.8(e)--6 counts. Concluded 4-5-85.	$ 5,000 + Consent Order
KENMORE TRANSPORTATION CO., INC. (Carrier)	Transporting hazardous materials in unauthorized cargo tank. Requiring/permitting driver to drive more than 10 hours following 8 consecutive hours off duty. Requiring/permitting driver to be on duty more than 70 hours in 8 consecutive days. 49 CFR 177.802, 177.33, 178.340 & 178.341--7 counts 49 CFR 177.804, 395.3(a)(1)--2 counts 49 CFR 177.804 & 395.3(b)--3 counts. Concluded 7-26-85	$16,000
KENTUCKY OIL & REFINING CO., INC. (Carrier)	Incomplete driver qualification files for each driver used to transport hazardous materials. Failing to require drivers to prepare driver's inspection report. Unauthorized cargo tank (no metal certification plate). Failure to have in files copy of report of last required 2-year visual inspection record of duty status. Failing to require drivers to prepare a driver vehicle of cargo tank and/or failing to mark cargo tank with date of last required visual inspection. 49 CFR 177.804 & 391.51--1 count 49 CFR 177.804 & 395.8--1 count 49 CFR 177.804 & 395.11--1 count 49 CFR 177.802 & 173.33--2 counts 49 CFR 177.824--3 counts. Concluded 5-28-85.	$ 3,000 + Consent Order 3,000 suspended pending audit
KULP, DAVID A. (Driver)	Flashing turn signals on one side only on parked or disable vehicle. Parking vehicle containing haz. mat. on or within 5 feet of traveled portion of highway. Failing to place warning devices for stopped vehicle containing flammable compressed gas. 49 CFR 177.804 ref'g 392.15(d)--1 count 49 CFR 177.804 ref'g 397.7(b)--1 count 49 CFR 177.854(f)(2)--1 count (SEE Also 49 CFR 392.25). Concluded 7-30-85	$ 150

LANGER TRANSPORT CORP. (Carrier)	Requiring/permitting driver to drive more than 10 hours w/o 8 consecutive hours off duty. Requiring/permitting driver to remain on duty more than 60 hours in 7 consecutive days. 49 CFR 177.804 & 395.3(a)--1 count. 49 CFR 177.804 & 395.3(b)--3 counts. Concluded 9-20-85	$ 6,000
L.C.P. CHEMICALS & PLASTICS, INC. (Shipper)	Packages not marked with the proper shipping name and identification number 49 CFR 172.301,or label 49 CFR 172.400; Copy of packaging exemption not at facility 49 CFR 173.22(a). Concluded 9-26-84.	$ 2,500
LIDO COMPANY OF NEW ENGLAND INC. (Carrier)	Failure to have copy of cargo tank certificate or mfr's data report & copy of report of last required visual retest or inspection of cargo tank, on file at principal place of business. Failure to properly maintain required inspection & maintenance records for vehicle. Failure to retain in carrier's files original copy of vehicle inspection report & certification of repairs for at least 3 months for vehicle. 49 CFR 177.814--3 counts 49 CFR 177.804 & 396.3--1 count 49 CFR 177.804 & 396.11(c)(2)--1 count. Concluded 8-5-85	$ 1,000
MAGNA CORPORATION (Carrier)	Improperly prepared hazardous waste manifest 49 CFR 172.202, 172.205, & 177.817]; Salvage drum label lacked proper shipping name, and the name and address of consignee 49 CFR 173.3; Did not deliver the entire quantity 49 CFR 171.3; Inadequate blocking/bracing 49 CFR 177.804 & 392.9. Concluded 11-8-84.	$ 8,000
MARKEN CHLORINE, INC., d.b.a. Olympic Chemical Co. (Carrier)	Shipping papers did not show: exemption number 49 CFR 172.203(a) and "RQ"49 CFR 172.203(c)(2); Improperly load/unload of chlorine cargo tank 49 CFR 173.33(f)(8); No driver qualification file 49 CFR 391.51(a); Duty status record overdue 49 CFR 395.8(i); No cargo tank certificate or manufacturer's data report at carrier's office 49 CFR 177.814(a); and no retest/inspection reports file 49 CFR 177.814(d)]. Concluded 2-26-85.	$ 3,500
McCORMACK'S HIGHWAY TRANSPORTATION, INC. (Carrier)	Requiring/permitting driver to falsify duty status record 49 CFR 177.804 & 395.8. Concluded 3-22-85.	$ 4,500
MEDICAL EMERGENCY MOTOR TRANSPORTATION CORP. D/B/A (Carrier)	Transporting haz. mat. under DOT exemption but failing to comply with all required provisions. Using driver less than 21 years of age. 49 CFR 171.2(b)--1 count 49 CFR 177.804 & 391.11--1 count. Concluded 6-27-85	$ 3,000
MHC MESSENGERS, INC. (Carrier)	Failure to transport hazardous material in accord w/terms & conditions of issued exemption. Using driver w/o medical examination. Failure to sure package against movement. 49 CFR 171.2(d)--1 count. 49 CFR 177.804 ref'g 391.45--1 count. 49 CFR 177.834(a)--1 count. Concluded 9-4-85	$ 3,000
MILL SERVICE, INC. (Carrier)	Requiring/permitting driver to remain on duty more than 70 hours in 8 consecutive days. 49 CFR 177.804 & 395.3(b)--9 counts. Concluded 8-6-85	$ 7,500
MORGAN, JAMES (Driver)	Driving more than 10 hours without having 8 consecutive hours off duty. 49 CFR 177.804/395.3(a)--2 counts. Concluded 4-25-85.	$ 250
MORRIS, RONALD E. (Driver)	Requiring or permitting a driver to make false entries upon a record of duty status. 49 CFR 177.804/395.8(e)--1 count. Concluded 3-13-85.	$ 250
MWR, INC. (Carrier)	Unauthorized cargo tank 49 CFR 177.802 & 173.33(a)]; and incomplete driver qualification file 49 CFR 177.804 & 391.51. Concluded 12-17-84.	$ 3,500
NELSON, WILLIAM M. (Driver)	Remaining on duty more than 70 hours in 8 consecutive days 49 CFR 177.804 & 395.3(b)--2 counts. Concluded 5-3-85.	$ 250
NEW ENGLAND MOTOR FREIGHT, INC. (Carrier)	Improper placard on motor vehicle 49 CFR 172.504 & 177.823. Concluded 12-27-84.	$ 2,000
NORTHERN GAS TRANSPORT (Carrier)	Requiring/permitting driver to make false entries on record of duty status. 49 CFR 177.804 & 395.8(e)--8 Counts. Concluded 9-27-85	$ 4,500
OCHOA INDUSTRIAL SALES CORP. (Shipper)	Improper description on shipping paper 49 CFR 172.202(a); Cargo tank not marked with proper identification number, "QT" or "NQT" 49 CFR 172.328(a), (d). Concluded 3-1-85.	$ 6,000
PARKER SOLVENTS CO., INC. (Shipper)	Failing to properly describe shipment of hazardous materials on shipping paper. 49 CFR 172.202--8 counts Failing to properly recondition container used for shipment and transportation of hazardous materials. 49 CFR 171.2 & 173.24--2 counts. Concluded 5-6-85.	$ 8,000
PERGAMENT DISTRIBUTORS, INC. (Carrier)	Offering shipment of haz. mat. for transportation not accompanied by properly prepared shipping paper including proper shipping name, hazard class, and ID No. of the haz. mat., and shipper's certification. 49 CFR 172.202 & 172.204--8 counts. Concluded 7-26-85	$ 5,000

PETROMARK, INC. (Carrier)	Transporting hazardous materials accompanied by improperly prepared shipping papers. 49 CFR 177.817--4 counts. Concluded 5-24-85.	$ 1,000
PITRE BROTHERS TRANSFER, INC. (Carrier)	Driver qualification file incomplete. 49 CFR 177.804 & 391.51--1 count Concluded 7-25-85.	$ 1,250
PORT OIL COMPANY (Carrier)	Driver's qualification file lacked: a medical certificate 49 CFR 177.804 & 391.51(b)(1)]; and inquiries into driver's driving record 49 CFR 177.804 & 391.51(c)(3). Concluded 11-21-84.	$ 1,000
QUARLES PETROLEUM, INC. (Carrier)	No cargo tank test and inspection date markings. 49 CFR 177.824(h) Concluded 12-11-84.	$ 1,500
RAEMIN TRUCKING CO., INC. (Carrier)	Driver qualification file incomplete 49 CFR 177.804 & 391.51]; Failure to require driver to prepare/submit duty status record 49 CFR 177.804 & 395.8. Concluded 8-5-84.	$ 3,000
RAMBACH CHEMICAL CO. (Carrier)	49 CFR 387.7--Operating vehicle without required minimum levels of financial responsibility--1 count. 49 CFR 172.301--Failing to mark ID # on container of haz. mat.--1 count. 49 CFR 172.400--Failing to label container of haz. mat. --1 count. 49 CFR 173.22(a)(2)--Failing to determine that container used for shipping haz. mat. has been manufactured and marked in accordance w/regulations. --1 count. Concluded 9-16-85.	$ 5,000
REAGENT CHEMICAL & RESEARCH CO. (Carrier)	Requiring/permitting driver used to transport hazardous materials (1) to drive more than 10 hours without having 8 consecutive hours off duty. (2) to remain on duty more than 70 hours in 8 consecutive days. 49 CFR 177.804 /395.3(a)--7 counts and (b)--12 counts. Concluded 4-5-85.	$ 9,500
RITTER TRANSPORTATION, INC. (Carrier)	Failing to maintain complete driver qualification files. Requiring/permitting driver to drive after having been on duty more than 70 hours in 8 consecutive days. 49 CFR 177.804 & 391.51--1 count 49 CFR 177.804 & 395.3(b)--4 counts. Concluded 6-26-85	$ 8,000
ROGERS, DANIEL W. (Driver)	Remaining on duty more than 70 hours in 4 consecutive days. 49 CFR 177.804 & 395.3(b)--2 counts. Concluded 5-3-85.	$ 250
RYDER P.I.E. NATIONWIDE (Carrier)	Poison label material loaded in same transport vehicle with foodstuffs intended for humans or animals 49 CFR 177.841(e). Concluded 4-29-85.	$ 1,500
RYDER TRUCK LINES, INC. (Carrier)	Improperly prepared shipping paper 49 CFR 177.817(a)]; Improper placard. 49 CFR 177.823(a)]. Concluded 11-30-84.	$ 2,000
SALEM PETROLEUM & HEAT CORP. (Carrier)	Failure to require driver to prepare duty status record 49 CFR 395.8(a); No driver qualification file 49 CFR 391.51. Concluded 2-20-85.	$ 1,500
SALITER, KARL J. D/B/A THE SHARON OIL CO. (Shipper/Carrier)	Using a driver less than 21 years old to transport hazardous materials. 49 CFR 177.804 & 391.11--1 count. Proper shipping name not used on shipping paper 49 CFR 172.202--2 counts. Transporting a shipment of hazardous material in an unauthorized cargo tank. 49 CFR 173.119--1 count. Concluded 4-2-85.	$ 3,000
SCHAFFER OIL CO. (Carrier)	Operating cargo tank w/o operable emergency discharge control and with open liquid discharge valve. 49 CFR 177.802 & 173.33 (49 CFR 78.326-11(a)) and 49 CFR 177.837(e)(2)--1 count. Concluded 9-5-85	$ 2,000
SCOTT-GROSS CO., INC. (Carrier)	Failure to retain required proof of financial responsibility at carrier's principal office. Requiring/permitting drivers to remain on duty more than 70 hours in 8 consecutive days. 49 CFR 387.7(d)--1 count. 49 CFR 177.804 & 395.3(b)--5 counts. Concluded 9-18-85	$ 7,500
SHARITZ, RALPH HENRY (Driver)	No placards 49 CFR 172.500 & 172.504. Concluded 2-27-85.	$ 1,500
SMITH, WHITNEY (Driver)	Driving more than 10 hours without having 8 consecutive hours off. Concluded 7-29-85.	$ 250
SOUTHERN FARMERS ASSOCIATION (Shipper)	Failing to properly describe haz. mat. on shipping paper. 49 CFR 172.200--10 counts (ALSO see 49 CFR 172.201, 172.202 & 172.203). Concluded 6-14-85	$ 6,000
SOUTHERN INTERNATIONAL FIREWORKS, INC. (Shipper/Carrier)	Driver not qualified 49 CFR 177.804 & 391.11]; Failure to require driver to prepare duty status record 49 CFR 177.804 & 395.8; Unattended vehicle Class B explosives 49 CFR 177.804 & 397.5]; Improper labels 49 CFR 172.400; Improper placard 49 CFR 177.823. Concluded 10-3-84.	$ 9,000 + Consent Order
SOUTHWESTERN MOTOR TRANSPORT, INC. (Carrier)	Failing to placard. Transporting haz. mat. without/properly prepared shipping paper. 49 CFR 177.823 & 172.504(a)--1 count 49 CFR 177.817(a)--1 count. Concluded 8-14-85	$ 2,000

SPECIALTY CHEMICAL CO., INC. (Carrier)	Improperly prepared shipping document 49 CFR 177.817(a). Concluded 3-6-85.	$ 1,750
ST. JOHNSBURY TRUCKING CO., INC. (Carrier)	Placarding freight container that does not contain hazardous materials. Transportation packing bearing poison label in vehicle with material marked or known to be edible material intended for consumption by humans or animals. Transporting hazardous materials with improperly prepared shipping paper. Moving vehicle with hazardous materials without proper marking or placarding. 49 CFR 177.802 & 172.502--1 count 49 CFR 177.841(e)--2 counts 49 CFR 177.817(a) 2 counts 49 CFR 177.823--1 count. Concluded 5-23-85.	$15,000
SUPERIOR PROPANE GAS, INC. (Carrier)	Driver less than 21 years old 49 CFR 177.804 & 391.11; Driver not certified 49 CFR 177.804 & 391.41; Improperly prepared shipping paper 49 CFR 177.817]. Concluded 11-16-84.	$ 2,000
SYNTEX CHEMICALS, INC. (Shipper)	Offering for transporting or transporting haz. waste or mat. in package that does not contain the contents under conditions normally incident to transportation. Offering package of haz. mat. or haz. waste without affixing prescribed label. 49 CFR 171.2, 171.3 & 173.24(a)(1)--1 count 49 CFR 171.2, 171.3 & 172.400(a)--1 count. Concluded 6-20-85	$ 7,500
TAMAYO, ANDRES O. (Driver)	Cargo tank of flammable liquid had manhole closure and valves in open position 49 CFR 177.837(e). Concluded 12-3-84.	$ 300
THERMICE CORP. (Carrier)	Requiring/permitting driver to falsify daily status record 49 CFR 395.8(e). Concluded 1-23-85.	$ 4,500
THONI OIL MAJIC BENZOIL GASOLINE STATIONS, INC. (Carrier)	Requiring/permitting falsification of drivers' records of duty status. Failure to have on file mfr's certificate or data report & retest & inspection report on cargo tank. 49 CFR 177.804 ref'g 395.8(e)--7 counts 49 CFR 177.814(a)(d)--1 count. Concluded 9-4-85	$ 5,000
TICAR CHEMICAL CO., INC. (Shipper/Carrier)	Name of carrier not marked on vehicle 49 CFR 177.804 & 397.21; Proper shipping name and identification number not marked on package 49 CFR 172.301(a). Concluded 10-17-84.	$ 2,000
TOTAL PETROLEUM, INC. (Carrier)	Transporting hazardous materials in leaking cargo tank. Failure to hydrostatically or pneumatically retest cargo tank. 49 CFR 177.801 & 173.33--1 count 49 CFR 177.824(c) & 173.33--1 count. Concluded 7-30-85	$ 3,000
UNITED PETROLEUM TRANSPORTS, INC. (Carrier)	Requiring/permitting driver to make false entries on record of duty status. 49 CFR 177.804 ref'g 395.8(e)--10 counts. Concluded 7-5-85	$ 6,000
U.S. STEEL CORP., Agri-Chemical Division (Carrier)	Cargo tank seam leaked 49 CFR 177.801, 173.33, 173.24]; Inlets and outlets not marked "vapor" or " liquid" 49 CFR 177.802, 173.33, 178.337-9(c)]; Internal valves inoperable 49 CFR 177.802, 173.33, 178.337-11(c)]. Concluded 10-15-84.	$ 5,000
VAN WATER & ROGERS (Carrier)	Improper placard 49 CFR 177.823(a); Inadequate blocking/bracing 49 CFR 177.834(a); Leaking, non-specification container 49 CFR 173.3(a) & 173.268(b)(4), & 178.83. Concluded 3-4-85.	$ 5,000
VETERANS TRANSPORT, INC. (Carrier)	49 CFR 173.33--Transporting haz. mat. in unauthorized cargo tank--2 counts. 49 CFR 177.817(a)--Transporting haz. mat. without properly prepared shipping paper.--2 counts. Concluded 2-21-85.	$10,000
WAL-BEN INDUSTRIES, INC. (Carrier)	Failure to have driver qualification file for driver used to transport hazardous materials 49 CFR 177.804 & 391.51--1 count. Improperly prepared shipping paper 49 CFR 177.817--2 counts. Concluded 4-2-85.	$ 2,000
WILLMS TRUCKING CO., INC. (Carrier)	Vehicle had no specification markings for transportation of hazardous material; exemption number not displayed on vehicle or in driver's possession. 49 CFR 173.32 Vehicle was not placarded or marked. 49 CFR 177.823--1 count. Concluded 4-17-85.	$ 3,000
ZELLNER, DONALD D. (Driver)	Did not stop before crossing railroad tracks 49 CFR 392.10. Concluded 3-3-85.	$ 250
ZUFELT, ROBERT (Driver)	Failing to attend vehicle containing class A explosives. 49 CFR 177.804 & 397.5--1 count. Concluded 5-20-85.	$ 225
	FHWA TOTAL	$404,925

AKRON CANTON AND YOUNGSTOWN RAILROAD (Carrier)	Transported hazardous materials in tank car without providing any member of the crew with shipping papers 174.26(c)]. 1 count Case No. ACY-82-1	$ 2,250
AMERICAN CYANAMID COMPANY (Shipper)	Offered for transportation a tank car containing hazardous materials when said car was not equipped with an effective rupture disc of approved design [173.31(b); 179.200-18(b)(1)] 1 count. Case No. ZACY-83-1.	$ 4,000
AMERICAN CYANAMID COMPANY (Shipper)	Offered for transportation a tank car containing hazardous materials while said car was marked with the names of hazardous materials other than the one actually contained in the car [172.330(d); 173.31(a)(4)] 1 count. Case No. ZACY-83-2.	$ 2,500
ASHLAND OIL, INC. (Shipper)	Offered for transportation tank cars of which the closures were not properly secured [173.31(b)(3)] 2 counts. Case No. ZASH-84-1.	$ 3,900
ATCHISON, TOPEKA AND SANTA FE RAILWAY CO. (Carrier)	Transporting empty tank cars that last contained hazardous materials with placards that showed the cars as loaded with hazardous materials; accepted the tank cars without ensuring that all openings were secure on each car; transporting hazardous materials when the waybill for a trailer did not indicate that it contained hazardous materials; placarding for trailer only indicated that it contained flammable liquids when in fact it also contained corrosive material [172.502(a)(1); 174.3 and 174.9(b); 174.25(a); 172.504(b)] 21 counts. Case No. ATSF-84-1.	$ 7,150
BORDEN CHEMICAL COMPANY (Shipper)	Offered for transportation a tank car containing hazardous materials while the safety relief valve of said tank was 21 months overdue for a retest [174.31(c)(1)] 1 count. Case No. ZBC-83-1.	$ 1,650
BORDEN CAROLINA CORPORATION (Shipper)	Offered for transportation tank cars last containing hazardous materials when none of the manhole cover bolts nor the outlet valve end plug was tightly secured; unloaded tank car containing hazardous materials without displaying the require caution sign and without blocking the wheels on said car [173.29(c)(1); 173.67(a)(2)(3)] 3 counts. Case No. ZBCC-83-1.	$ 4,500
BURLINGTON NORTHERN INC. (Carrier)	Transported class A explosives entrained next to the engine; transporting anhydrous ammonia, classified as nonflammable gas, entrained as the first through the fifth cars, next to occupied caboose; cut off while in motion placarded box car containing high explosives, class A, [174.88; 174.91; 174.84(b)] 7 counts. Case No. BN-83-1.	$20,000
BURLINGTON NORTHERN INC. (Carrier)	Transported empty tank cars each of which had been cleaned and purged of residue and vapor and containing no hazardous materials; nevertheless, first three cars displayed placards indicating they were loaded with a flammable liquid. The other six cars displayed placards indicating they were empty and last contained a flammable liquid [172.500(a); 172.502(a) 9 counts. Case BN-83-2.	$ 1,500
BURLINGTON NORTHERN INC. (Carrier)	Transported placarded tank car which last contained corrosive material, entrained immediately behind the engine; transported the tank car with an improperly prepared waybill; trailer of freight containers containing hazardous materials with waybills that failed to show the information required for hazardous materials shipments; tank cars last containing hazardous materials without the manway covers being properly secured due to improper inspection; Transported tank cars without the waybills having the placard endorsement, or a proper description of the lading [174.93; 174.25(c); 172.202; 172.203; 174.26(c); 174.9(b); 174.25(a)(2)& (c)] 16 counts. Case No. BN-84-1.	$12,250
B&O RAILROAD, CO. (Carrier)	Operated train with tank car loaded with hazardous materials entrained next to a flat car, loaded with machinery [174.92(a)(5)] 1 count. Case No. BO-82-1.	$ 2,750
B&O RAILROAD, CO. (Carrier)	Transported hazardous materials when no member of the crew had in his possession a waybill containing all required information in that the waybill for such lading omitted the commodity description, hazard class, placard notation, and endorsement; transported placarded tank car containing hazardous materials, placarded poison, and entrained as the third car from the engine [174.25(a); 174.26(c); 174.91] 2 counts. Case No. BO-83-1.	$ 4,100
B&O RAILROAD, CO. (Carrier)	Transported tank car containing hazardous materials using incorrect and incomplete waybills; transported tank car containing corrosive liquid entrained next to box car that had an internal combustion engine in operation [174.25(a); 179.92(a)(7)] 2 counts. Case No. BO-84-1.	$ 3,000

B&O RAILROAD, CO. (Carrier)	Transported tank car containing carbolic acid entrained as the second car from the engine [174.91] 1 count. Case No. BO-84-2.	$ 1,350
B&O RAILROAD, CO. (Carrier)	Transported tank car containing chlorine without a member of the crew having in his possession properly prepared shipping papers; Improperly prepared shipping papers [174.26(c); 174.25(a)] 3 counts. Case No. BO-84-3.	$ 7,450
CENTRAL OF GA RAILROAD CO. (Carrier)	Accepted for transportation tank car with switching orders which failed to describe the hazardous material and failed to include placard notation [174.24(a); 174.25(b)(1) and (3)] 4 counts. Case No. CGA-84-1.	$ 5,000
CHESAPEAKE & OHIO RAILROAD CO. (Carrier)	Transported tank car which contained caustic soda liquid and was placarded corrosive, entrained next to occupied caboose; transported tank car when no member of the train crew had in his possession a copy of the shipping paper for hazardous materials being transported [174.91; 174.26(c)]. 2 counts. Case No. CO-83-1.	$ 3,150
CHESAPEAKE & OHIO RAILROAD CO. (Carrier)	Transporting hazardous materials entrained as the third car from the engine [174.91] 1 count. Case No. CO-84-1.	$ 3,600
CHESAPEAKE & OHIO RAILROAD CO. (Carrier)	Transporting hazardous materials entrained as the third, fourth, and fifth cars, from the occupied caboose [174.91] 5 counts. Case No. CO-84-2.	$ 9,900
CHICAGO, MILWAUKEE, ST. PAUL & PACIFIC RAILROAD CO. (Carrier)	Transported a tank car containing hazardous materials which was leaking as a result of insecure fittings [174.50] 2 counts. Case No. MILW-80-2.	$ 4,000
CHICAGO, MILWAUKEE, ST. PAUL & PACIFIC RAILROAD CO. (Carrier)	Cut off in motion flatcar loaded with hazardous materials [174.84(a)] 1 count. Case No. MILW-84-1.	$ 3,000
CHICAGO & NORTHWESTERN TRANS. CO. (Carrier)	Transported tank car containing hydrochloric acid entrained next to an open-top Gondola car with lading extending above the car ends and liable to shift so as to protrude beyond the car ends; transported tank car containing residual amounts of caustic soda and bearing "empty/corrosive" placards, positioned next to trailing engine [174.92(a)(6); 174.93] 2 counts. Case No. CNW-82-1.	$ 5,500
C-I-L, INC. (Shipper)	Offered for transportation a tank car, containing hazardous materials, having failed to properly secure all closures of openings on said tank car [171.2(a); 173.31(b)(3)] 1 count. Case No. ZCIL-83-1.	$ 1,800
CLINCHFIELD RAILROAD, CO. (Carrier)	Operated tank car loaded with hazardous materials positioned next to the engine [174.91] 1 count. Case No. CCO-82-1.	$ 4,000
CONSOLIDATED RAIL CORP (Carrier)	Accepted for transportation and transported tank car containing hazardous materials which was not equipped with shelf couplers [174.3] 1 count. Case No. CRC-80-2.	$ 2,000
CONSOLIDATED RAIL CORP (Carrier)	Transporting hazardous materials entrained as the fourth car from a locomotive [174.91] 1 count. Case No. CRC-81-2.	$ 1,500
CONSOLIDATED RAIL CORP (Carrier)	Transported hazardous materials positioned next to a flatcar which carried a loaded flatbed trailer and a loaded flatcar unequipped with permanently attached ends of rigid construction [174.92(a)(5)(i)(ii)] 2 counts. Case No. CRC-81-5.	$ 5,900
CONSOLIDATED RAIL CORP (Carrier)	Transported a tank car containing hazardous materials accompanied by an incomplete waybill [174.202, 172.203, and 174.25(a)(2)] 1 count. Case No. CRC-81-6.	$ 1,200
CONSOLIDATED RAIL CORP (Carrier)	Transported tank cars containing hazardous materials entrained next to a flatcar loaded with lumber and as the first, second and third cars, respectively, behind locomotive, and without providing the train crew with a document correctly indicating the position in the train of each placarded car loaded with a hazardous materials [174.92(a)(5); 174.91; 174.26(b)] 5 counts. Case No. CRC-81-7.	$12,500
CONSOLIDATED RAIL CORP (Carrier)	Transported hazardous materials entrained next to a flatcar without bulkheads and transported an open gondola car loaded with steel beams extending above the car ends and liable to shift so as to protrude beyond the car ends, entrained next to tank car [174.92(a)(5)(6)] 2 counts. Case No. CRC-82-1.	$ 9,000

CONSOLIDATED RAIL CORP (Carrier)	Transported an empty tank car which last contained liquefied petroleum gas entrained as the last car ahead of the occupied caboose [174.93] 1 count. Case No. CRC-82-2.	$ 2,500
CONSOLIDATED RAIL CORP (Carrier)	Transported tank cars entrained as the third car behind the engine and, fourth and second car behind the occupied caboose and without any member of the crew having possession of a document indicating the car's position in the train or a copy of the shipping papers for that car [174.91; 174.26 (b)(c); 174.92(a)(f)] 10 counts. Case No. CRC-83-2.	$34,800
CONTINENTAL FOREST INDUSTRIES (Shipper)	Offered for transportation tank cars, loaded with hazardous materials, when a car's outage was less than 2 percent; a car's manway cover was not properly secured in place; and the switching orders for the initial movement of the cars did not contain all required information [173.116(e); 173.31(b)(3); 174.25(b)(1-4)] 6 counts. Case No. ZCFI-83-1.	$ 7,000
COSDEN OIL AND CHEMICAL COMPANY (Shipper)	Offered for transportation a tank car containing hazardous materials, whose gas valve was inoperative and leaking and whose eduction valve closure plug was loose [173.31(b)(3)] 1 count. Case No. ZCOC-85-1.	$ 7,500
DAN RIVER INC. (Shipper)	Offered for transportation a tank car containing hazardous materials, without ensuring that the manway cover was properly secured against leakage [173.31(b)(3)] 1 count. Case No. ZDR-84-1.	$ 4,500
DIAMOND SHAMROCK CORP. (Shipper)	Offered for transportation a tank car containing hazardous materials when said tank car was overdue for retest [173.31(c)(1)] 1 count. Case No. ZDSC-83-1.	$ 1,900
DIVERSIFIED CHEMICALS & PROPELLANTS, INC. (Shipper)	Offered for transportation a tank car containing hazardous materials when the car had been stenciled for service for another hazardous material shipment [173.31(a)(4) 1 count. Case No. ZDC-84-1.	$ 1,000
ESTECH GENERAL CHEMICAL CORP. (Shipper)	Failure to determine to the extent practicable that the fittings were proper condition for the safe transportation of the lading and failure to properly secure all closures of openings in the tank car [173.1; 173.31(b)(1)(3)] 1 count. Case No. ZEGC-81-1.	$ 4,000
ESTECH, INC. (Shipper)	Failure to ensure that all openings on an empty tank car that last contained sulfuric acid were securely closed. [Section 173.1, .29(c).30; 174.67(k) 1 count]. Case No. ZEGC-84-1.	$ 1,000
FERRO CORP. (Shipper)	Failure to determine that the tank, safety appurtenances, and fittings of a placarded loaded tank car containing mining reagent liquid were in proper condition and that all closures of openings and their protective housings were properly secured. [Section 173.31(b)(1)(b)(3) 1 count]. Case No. ZFEC-85-1	$ 2,000
FMC CORP. (Shipper)	Failure to mark the commodity on each side of a tank car containing phosphorus and failure to properly secure the outlet valve and manway cover on a tank car that last contained caustic potash ash. [Section 173.1, .190(b)(3)(i); 174.67(k) 3 counts]. Case No. ZFM-84-1.	$ 4,000
FREIGHT A. RANGER (Freight Forwarder)	Improperly described hazardous materials on shipping papers for a COFC shipment of various hazardous materials. [Section 172.200(a) 172.202(a) (1)(2)(3)(b) 1 count]. Case No. ZFAR-84-1.	$ 1,500
GEORGIA PACIFIC CORP. (Shipper)	Failure to properly secure manway cover on tank car containing formaldehyde resulting in a leak of the contents and injury to an employee. [Section 173.31(b)(1)(3) 1 count]. Case No. ZGPA-82-2.	$ 3,500
GEORGIA PACIFIC CORP. (Shipper)	On four separate occasions placed in service a tank car loaded with alcohol n.o.s. on which the safety relief valve was overdue for retest. [Section 173.31(b)(1), (c) 4 counts]. Case No. ZGPA-82-1.	$ 5,500
GEORGIA RAILROAD (Carrier)	Transported tank cars containing hazardous materials without any member of the train crew possessing the required shipping papers for such shipment also not in the crew possession a document indicating the position in the train of such cars [174.26(b)(c)] 4 counts. Case No. GA-82-2.	$ 5,500
GRAND TRUNK WESTERN RAILROAD CO. (Carrier)	Transporting tank car containing hazardous materials entrained as the fourth car from the occupied caboose [174.91] 1 count. Case No. GTW-83-3.	$ 1,800
GREAT LAKES CHEMICAL CORP. (Shipper)	Overloaded a tank car with bromide by approximately 3,216 pounds. [Section 173.252(a)(3)(i) 1 count]. Case No. ZGLC-83-1.	$ 2,850

HATTIESBURG STORAGE FACILITY (Freight Forwarder)	Placed in service a tank car loaded with liquefied petroleum gas on which the safety relief valve was overdue for retest. [Section 173.31(c) 1 count] Case No. ZHSF-83-1.	$ 250
HERCULES INC. (Shipper)	Offered for transportation two loaded placarded tank cars containing sulfuric acid when the manway covers were not secured, resulting in a release and personal injury. Two counts. 49 CFR 173.31(b)(3). Case No. ZHRC-84-1.	$ 9,500
HYDRO TECH CHEMICAL CORP (Shipper)	Offloaded a tank car containing chlorine without displaying caution signs or blocking the car's wheels. [Section 173.30, 174.67(a)(2)(3) 1 count] Case No. ZHYD-84-1.	$ 2,000
INDIANA HARBOR BELT BELT RAILROAD (Carrier)	Transporting a loaded tank car containing hazardous materials entrained next to a car with a mechnical refrigerator apparatus in operation 174.92(a)(7)] 1 count. Case No. IHB-84-2.	$ 3,000
INTERCONTINENTAL TERMINALS COMPANY (Freight Forwarder)	Offered for transportation 3 tank cars containing n.o.s. Isoprene classified as a flammable liquid when the tank cars were authorized for LPG service only. [Section 173.31(a)(4) 3 counts]. Case No. ZIT-85-1.	$ 4,950
INTERNATIONAL MINERALS AND CHEMICAL CORP (Shipper)	Offered for transportation a tank car loaded with phosphoric acid which had been altered without AAR or the car owners approval and which was leaking its contents due to a broken liner. [Section 173.31(b)(1)(3), (f)(2); 173.243; 179.3(a), 200-18(b)(1), 201-1(a) 2 counts]. Case No. ZIMC-82-1.	$ 4,500
JOSEPH E SEAGRAM & SONS (Shipper)	Placed in service a tank car that last contained alcohol n.o.s. without displaying an "Empty" placard; without closing all openings and protective housings with a suitable tool. Unloaded a tank car containing alcohol n.o.s. without displaying a caution sign. [Section 174.67(a)(3), (k) 174.69 3 counts]. Case No. ZJSS-84-1.	$ 3,750
KAISER AGRICULTURAL CHEMICALS (Shipper)	Offered for transportation a tank car loaded with anhydrous ammonia that exceeded the maximum filling density. [Section 173.314(c) 1 count]. Case No. ZKAC-83-1.	$ 2,000
KAISER AGRICULTURAL CHEMICALS (Shipper)	Failure to ensure that the safety appurtenances, fittings, and protective housings on 8 tank cars containing anhydrous ammonia were in proper condition and properly secured. Failure led to vapor and ammonia leaks. [Section 173.31(b)(1) and (3) 8 counts]. Case No. ZKAC-84-1.	$18,000
KOPPERS CO. (Shipper)	Placed in service a tank car containing sodium hydrosulfide solution without the safety relief valve being retested periodically. [Section 173.31(c)(1) 1 count]. Case No. ZKCI-84-1.	$ 2,500
KUEHUE CHEMICAL CO. (Shipper)	Failure to properly secure the bottom outlet caps on two empty tank cars which last contained caustic soda. [Section 173.29(a); 174.67(k) 2 counts] Case No. ZKUE-85-1.	$ 1,000
LINDEN BULK TRANSPORTATION CO. (Freight Forwarder)	Failure to ensure that safety appurtenances and fittings of tank cars containing spent sulfuric acid classified as corrosive were in proper condition and properly secured and closure of all openings secured. Attached unloading connections were not disconnected when unloading discontinued, and were left unattended. [Section 173.31(b)(1)(3); 174.67(i) 4 counts]. Case No. ZLBT-85-1.	$ 3,500
LIQUID CARBONIC CORP. (Shipper)	Unloaded liquefied carbon dioxide from tank cars without hand brakes being set or wheels being blocked [Section 174.67(a)(2), (3) 3 counts] Case No. ZLCC-82-1.	$ 2,250
LIQUID CARBONIC CORP. (Shipper)	Improperly secured closures on empty placarded tank car last containing carbon dioxide [Section 173.29(c)(1)(2) 1 count]. Case No. ZLCC-85-1.	$ 1,400
LOS ANGELES PIGGY BACK SERVICE, INC. (Shipper)	Offered for transportation at Los Angeles, California, a loaded placarded trailer containing corrosive liquids, n.o.s., without describing the hazardous material on the shipping paper. One count. 49 CFR 172.200(a) and 172.202(a). Case No. ZLAP-84-1.	$ 2,400
LOUISVILLE & NASHVILLE RAILROAD CO. (Carrier)	Transported tank car containing hazardous materials entrained next to a mechnical refrigerator car with its automatic refrigeration apparatus in operation; transported hazardous materials without any member of the train crew having in their possession the shipping papers for the cars [174.92(a)(7); 174.26(c)] 3 counts. Case No. LN-82-1.	$ 3,000

LOUISVILLE & NASHVILLE RAILROAD CO. (Carrier)	Transported tank car loaded with hazardous materials while such car was visibly leaking its contents from its safety vent; transported tank car containing hazardous materials entrained as the second and third cars, respectively, from the occupied caboose; improperly prepared waybill which failed to include all required information describing the hazardous material being shipped; cut off flatcars carrying hazrdous materials while in motion [174.8; 174.91; 174.25; 174.84] 9 counts. Case No. LN-82-2.	$16,500
LOUISVILLE & NASHVILLE RAILROAD CO. (Carrier)	Transported a tank car containing hazardous materials entrained next to a gondola car loaded with poles extending above the car ends that were liable to shift so as to protrude beyond the car ends [174.92(a)(6) 1 count. Case No. LN-82-3.	$ 2,000
LOUISVILLE & NASHVILLE RAILROAD CO. (Carrier)	Offered for transportation one tank car containing hazardous materials accompanied by a waybill that contained an incorrect description, hazard class, and placard notation and one without any waybill [174.10(c)] 2 counts. Case No. LN-82-4.	$ 1,500
LOUISVILLE & NASHVILLE RAILROAD CO.	Transported tank cars each contained hazardous materials entrained as the third through fifth cars, respectively, from the engine. No. LN-83-1.	$ 6,000
LOUISVILLE & ARKANSAS RAILWAY CO. (Carrier)	Transported tank car that last contained hazardous materials entrained as the first car behind the engine [174.93] 1 count. Case No. LA-84-1.	$ 1,800
MAT CHEMICAL CO. (Shipper)	Offered for tansportation to Florida East Coast Railway an empty placarded tank car last containing muriatic acid, a corrosive substance, without each opening being tightly closed. [Section 173.29(c)(1) 1 count]. Case No. ZMC-82-1.	$ 1,000
MERICHEM CO. (Shipper)	Loaded a flammable liquid into a tank car stencilled "inedible tallow" and marked "Not for flammable Liquids"; failure to properly secure the manway cover and failure to stencil the tank car with the year in which its heater system was last tested. [Section 173.1, 31(c)(10) .31(b)(3) .31(a)(4), .22(a), 4 counts]. Case No. ZMER-83-1.	$13,000
MOSINEE PAPER CORP. (Shipper)	Loaded flammable liquid n.o.s. into a tank car not authorized to transport flammable liquids and issued a bill of lading lacking the notation "Placarded flammable." [Section 173.1; .31(a)(4) .22; 172.203(g) 3 counts]. Case No. ZMPC-83-1.	$ 8,500
NATIONAL AMMONIA CO. (Shipper)	Failure to properly secure the dome protective housing cover on an empty tank car offered in transportation and which last contained anhydrous ammonia. [Section 173.1, 31(b)(3) 1 count]. Case No. ZNAM-84-1.	$ 1,000
NORFOLK & WESTERN RAILWAY CO. (Carrier)	Transported tank car containing hazardous materials entrained as the fifth car behind the locomotive [174.91] 1 count. Case No. NW-82-1.	$ 1,750
NORFOLK & WESTERN RAILWAY CO. (Carrier)	Operated its train loaded with hazardous materials entrained the fourth and fifth cars from the engine [174.91] 2 counts. Case No. NW-82-2.	$ 3,350
NORFOLK & WESTERN RAILWAY CO. (Carrier)	Operated train with tank cars loaded with hazardous materials without a member of the train crew having in his possession a copy of the shipping papers for the shipments of the hazardous materials being transported; no member of the train crew had a document indicating the position of the hazardous materials in the train [174.26(b)(c)] 3 counts Case No. NW-82-3.	$ 6,800
NORFOLK & WESTERN RAILWAY CO. (Carrier)	Transported tank cars containing hazardous materials without any member of the train crew having in his possession a copy of the shipping papers for the shipments of hazardous materials being transported [174.26(c)] 3 counts. Case No. NW-82-4.	$ 4,500
NORFOLK & WESTERN RAILWAY CO. (Carrier)	Operated train with tank car loaded with hazardous materials positioned next to an open top gondola loaded with steel pipe which extends above the car ends and liable to shift so as to protrude beyond the car ends [174.92(a)(6)] 1 count. Case No. NW-82-5.	$ 3,250
NORFOLK & WESTERN RAILWAY CO. (Carrier)	Accepted and transported hazardous materials while the tank and its safety fittings were not in proper condition for safe transportation, and the manway cover was not tight against leakage of liquid [174.3] 1 count. Case No. NW-83-1.	$ 700

NORFOLK & WESTERN RAILWAY CO. (Carrier)	Cut off, while in motion, flatcar loaded with hazardous materials; waybill covering the shipment failed to indicate the proper shipping name, hazard class, and placard notation; transported tank cars containing hazardous materials entrained as the first and second cars, respectively, from the engine; no member of the train crew had in their possession a copy of the shipping papers for the shipment of hazardous materials being transported [174.84(a); 174.25(a); 174.91; 172.202; 172.203] 6 counts. Case No. NW-84-2.	$10,500
OCCIDENTAL CHEMICAL COMPANY (Shipper)	Offered for transportation an empty tank car that last contained anhydrous ammonia on which all openings were not tightly closed. [Section 173.29(f)(1). 1 count]. Case No. ZOCC-81-1.	$ 2,500
OCCIDENTAL CHEMICAL COMPANY (Shipper)	Offered in transportation tank cars loaded with anhydrous ammonia without properly secured openings and with incomplete shipping papers. [Section 172.200(a); 202(a)(1); 203(g) 204(a); 173.1(b), 31(b)(1)(3) 8 counts]. Case No. ZOCC-82-1.	$13,000
OHIO OIL GATHERING CORP. (Shipper)	Placed in service a tank car loaded with petroleum crude oil, the interior heater papers of which were overdue for retest. [Section 173.1, 31(c)(1) 1 count]. Case No. ZOOGC-82-2.	$ 750
OLIN CORPORATION (Shipper)	Filled a tank car with anhydrous ammonia in excess of the maximum permitted filling density. [Section 173.1, 314(c) 1 count]. Case No. OLI-83-1.	$ 3,000
PENNWALT CORPORATION (Shipper)	Improperly placarded as "loaded" an empty tank car which last contained ferric chloride solution and improperly described the last contents of the car on the shipping papers. [Section 172.510; 173.1; 174.25 3 counts] Case No. ZPC-84-1.	$ 4,900
PETRO-TEX CHEMICAL CORP. (Shipper)	Failure to mark tank car loaded with butadiene, inhibited, with the proper shipping name or authorized common name of the commodity. [Section 172.330(a); 173.314(b)(5) 1 count]. Case No. ZPTC-80-1.	$ 500
PHELPS DODGE CORP. (Shipper)	Placed in service 4 tank cars containing sulfuric acid without first determining that they were in proper condition for the safe transportation of the lading. [Section 173.1, 31(b)(1) 4 counts]. Case No. ZPDC-81-1.	$11,000
PHELPS DODGE CORP. (Shipper)	Placed in service a tank car containing sulfuric acid which was overdue for periodic retest of the tank and interior heating septum. [Section 173.31(c)(1) 1 count]. Case No. ZPDC-81-2.	$ 3,000
PORT RAILROAD TERMINAL ASSOC. (Carrier)	Operated its train with tank car loaded with hazardous materials positioned as the third car from the engine [174.91] 1 count. Case No. PTRA-82-2.	$ 3,000
PPG INDUSTRIES (Shipper)	Failure to secure bolts on manway cover of a tank car containing liquid caustic soda. [Section 173.31(b)(3) 1 count]. Case No. ZPPG-83-1.	$ 1,500
SEABOARD COAST LINE RAILROAD CO. (Carrier)	Operated trains with tank cars loaded with hazardous materials positioned next to the engine, to a loaded flatcar, and to a refrigerator car which had its refrigeration unit operating also without any member of the train having in his possession a copy of the shipping papers for the shipment of hazardous materials being transported [174.91; 174.26; 174.92(a)(5); 174.92(a)(7)] 4 counts. Case No. SCL-82-1.	$ 7,500
SEABOARD COAST LINE RAILROAD CO. (Carrier)	Transported tank car containing hazardous materials entrained next to a gondola car loaded with utility poles that extended over the sides of the car and liable to shift so as to protrude beyond the car ends [174.92(a)(6) 1 count. Case No. SCL-82-2.	$ 3,500
SEABOARD COAST LINE RAILROAD CO. (Carrier)	Transporting empty tank car last contained hazardous materials without a member of the train crew having in his possession a copy of the shipping papers for the shipment of hazardous materials being transported [174.26(c)] 1 count. Case No. SCL-83-1.	$ 2,500
STANDARD CHLORINE CHEMICAL CO. (Shipper)	Loaded a tank car equipped with a safety vent with chlorobenzene, a commodity not authorized for transportation in such a car [Section 173.1, 241(a)(3) 1 count]. Case No. ZSCL-81-1.	$ 2,000
SUN, GAS, LIQUIDS (Shipper)	Placed in service a tank car containing liquefied petroleum gas, which was overdue for retest. [Section 173.1, 31(b)(c)(1) 1 count]. Case No. ZSGL-83-1.	$ 250
TENNECO CORPORATION (Shipper)	Failure to tightly close openings on a tank car containing residual amounts of liquefied petroleum gas. [Section 173.1, 29(f)(1) and (2) 1 count]. Case No. ZTOC-81-1.	$ 3,000

TERMINAL FREIGHT COOPERATIVE ASSOCIATION (Freight Forwarder)	Failure to properly describe on the shipping papers, the contents of two trailers loaded with Benzaldehyde and Enudersol respectively. [Section 172.200, 202 2 counts]. Case No. ZTFC-84-1.	$ 7,000
TOSCO CORPORATION (Shipper)	Failure to determine that the tank, safety appurtenances, and fittings of a tank car containing spent sulphuric acid and which was not equipped with a safety relief device, were in proper condition. [Section 173.31(b)(1); 179.200-18(b)(1) 1 count]. Case No. ZTC-82-2.	$ 1,500
UNION PACIFIC RAILROAD (Carrier)	Transported tank cars containing hazardous materials entrained as the second and third car from the engine; transported two empty tank cars when no member of the train crew had in his or her possession a copy of the shipping papers for cars [174.91; 174.26(c)] 4 counts. Case No. UP-82-1.	$12,000
VINELAND CHEMICAL CO. (Shipper)	Improperly unloading of methyl chloride from a tank car into a cargo tank; failure to set the tank car's brakes, block the wheels, or display a caution sign. [Section 174.67(a)(2)(3) 1 count.]. Case No. ZVCC-80-1.	$ 1,000
WESTERN MARYLAND RAILWAY CO. (Carrier)	Transported a tank car which was loaded with hazardous materials and was entrained next to the engine [174.91] 1 count. Case No. WM-80-1	$ 1,250
WESTERN MARYLAND RAILWAY (Carrier)	Transporting a tank car that had last contained hazardous materials entrained next to the locomotive [174.93] 1 count. Case No. WM-84-1.	$ 2,000
WHITBREAD NORTH AMERICA (Shipper)	Failure to properly secure the manway covers and to remove or replace placards on an empty tank car last containing alcohol. [Section 174.67(k), 69; 172.510(c) 6 counts]. Case No. ZJWS-85-1.	$ 2,000
	FRA TOTAL	$476,050

RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION

AIR CAPITOL WHOLESALE FIREWORKS (Shipper)	Failed to provide the shipper and the forwarding agent at the place of entry into the U.S. with timely and complete information as to the requirements of 49 CFR that would apply to an imported shipment of fireworks once it reached the U.S. 171.12(a) 1 count Date Concluded 7/29/85.	$ 3,500
ANSUL/WORMALD U.S., INC. (Cylinder Manufacturer)	Manufactured, marked, and sold DOT specification 4BW cylinders which did not meet that specification because proper elongation values were not achieved on two-inch gauge length test specimens cut from cylinders purchased and tested by DOT. 178.61-16(a) 1 count Date Concluded 9/30/85.	Compliance Order
ASSOCIATED COURIER, INC. (Carrier/Exemption holder)	Accepted and transported a radioactive material that was improperly packaged labeled and described. Employed a driver who was not trained as part of a radiation protection program. [Section 173.412(b) 1 count; 172.403(g)(1) (2), and (3) 3 counts; 172.203(d)1 (iii)- 1 count; Par 7 (e) of DOT E-8308- 1 count]. Date Concluded 12/31/84.	$ 2,500
CINTICHEM, INC. (Shipper)	Offered radioactive material for transportation in commerce with an incorrect transport index entered on the labels and which exceeded the amount authorized to be carried aboard passenger carrying air craft. [172.403(g)(3) - 4 counts; 173.448(e) 3 counts]. Date Concluded 6/14/85.	$13,500
FIRE ART CORPORATION (Shipper)	Failed to provide the shipper and the forwarding agent at the place of entry into the U.S. with timely and complete information as to the requirements of 49 CFR that would apply to an imported shipment of fireworks once it reached the U.S. [171.12(a) - 1 count]. Date Concluded 11/08/84.	$ 2,500
FLASH FIRE EQUIPMENT (Cylinder Retester)	Represented and marked DOT specification cylinders as having been retested when in fact they had not been retested. [173.34(e) 173.34(e)(6) - 5 counts]. Date Concluded 5/29/85.	$ 2,500
***KLAUSEN-GESTBY CO., INC. (Shipper)**	Certified that a hazardous material offered for transportation was in accordance with the 49 CFR when it was not packaged in a DOT specification container and lacked the proper hazard class description on the shipping papers. [Section 173.302(a)(1)-1 count; 172.202(a)(2) 1 count; 172.204(a) 1 count]. Date Concluded. 10/18/85.	$ 3,500
***LAYTON BROTHERS DRUM CO. (Drum Reconditioner)**	Represented, marked, and sold reconditioned DOT specification 17H drums as meeting the requirements of that specification when they did not because their removable heads were thinner than is required. [178.118-6(a) 173.28(m)(3) (ii) - 1 count]. Date Concluded 10/4/85.	$ 5,000
***LETICA CORPORATION (Plastic Pail Manufacturer)**	Manufactured, marked, and sold DOT E-8735 containers for which no cold drop or hydrostatic testing had been conducted. [178.19(a)(2),(b); 178.19 7(a) (3) Par. 7(c) of E-8735 2 counts]. Date Concluded 10/8/85.	$ 4,500

LIOYD'S REGISTER INDUSTRIAL SERVICES (Foreign Independent Inspection Agency)	Certified DOT specification 3AA cylinders as being manufactured in accordance with that specification when:(a) it failed to verify all the required markings on the cylinders and (b) signed inspection reports which listed a test pressure that was not actually marked on the cylinders. [Section 178.37-4(c)-4 counts; Section 105(c) of HMTA - 3 counts]. Date Concluded 7/16/85.	$15,000
*NORPAK DIVISION, B.W. NORTON MANUFACTURING CO. (Plastic Pail Manufacturer)	Manufactured, marked, and sold DOT E-8388 containers for which no hydrostatic testing had been performed and Manufactured, marked, and sold DOT specification 35 containers for which no periodic drop testing had been conducted. [Section 178.19-7(a) Par. 7(ii) of E-8388 1 count; Section 178.16(a) - 1 count] Date Concluded 12/18/85.	$ 3,000
PITTSBURGH TESTING LABORATORIES, Independent Inspection Agency	Certified DOT specification 39 cylinders as being manufactured in accordance with that specification after failing to recognize that the manufacturer's flattening test apparatus was not in proper condition and for, failing to ensure that the manufacturer had implemented a steel heat lot control procedure which would allow the attachment of the proper chemical analysis to the inspector's reports for each lot of cylinders. Certified DOT specification 3AA cylinders as being manufactured in accordance with that specification after failing to obtain chemical analysis performed in the U.S. for steel made in France and purchased by the manufacturer. [Section 178.65-4(c)(4)(5) - 2 counts; 178.37-4(b) and (c)-1 count]. Dated Concluded 1/3/85.	Compliance Order
*PLASTIC INDUSTRIES INC. (Plastic Bottle Manufacturer)	Manufactured, marked, and sold DOT E-6614 containers for which no cold drop or hydrostatic testing had been performed. Manufactured, marked, and sold DOT specification 2E containers for which no cold drop testing had been performed and which were improperly marked with the wrong year of manufacture. [Section 178.19 7(a)(2) and (b); (a)(3); Para. 7(a) of E-6614 - 2 counts; 178.24(a) - 5(c)(d)(2) 1 count; 178.24 a-6(a)(1) - 1 count]. Date Concluded 10/1/85.	$ 3,000
RABBIT TRANSIT, INC. (Motor Carrier)	Transported a yellow III radioactive material in a vehicle that was not placarded and which was not in proper condition for transportation because the minimum separation distances between the material and the space occupied by persons had not been followed. [Section 177.842(b) - 1 count; 172.504(a); 172.506(a)(1); 177.823(a) - 1 count]. Date Concluded 8/20/85.	$ 2,000
RCA CORPORATION (Shipper)	Failed to comply with the terms and conditions of DOT exemption [Section 173.27(a) 172.101, Col. 6(b) - 2 counts]. Date Concluded 6/10/85.	$18,000
*RHEEM MANUFACTURING COMPANY (Steel Drum Manufacturer)	Manufactured, marked, and sold DOT specification 17C containers for which no drop or hydrostatic testing had been performed. Manufactured, marked, and sold DOT specification 17E containers for which no drop testing or hydrostatic had been performed in ten months. Manufactured, marked, and sold DOT specification 17H containers for which no drop testing or hydrostatic testing had been performed in ten months. [Section 178.115-12(a)(1)(2)-2 counts; 178.116-12(a)(1)(2)-2 counts; 178.118-12 (a)(1)(2)-2 counts]. Date Concluded 10/2/85.	$ 9,000
*SCHLUMBERGER WELL SERVICES (Shipper)	Offered a hazardous material for transportation by air which was not properly classified and certified because no competent authority approval had been obtained prior to shipment and which were forbidden explosives and not allowed to be transported because no DOT approval had been issued at the time they were offered for transportation. [Section 171.11(a) Part 2, Chapter 1, Par. 1.3 of ICAO Technical Instructions; 1 count; 173.51(b) 173.86(b)-2 counts]. Date Concluded 11/21/85.	$15,000
SELECT DRINK, INC. (Shipper)	Offered DOT specification 3AA cylinders for transportation in commerce which had not been retested within the prescribed five-year period. [Section 173.301(c)- 7 counts]. Date Concluded 2/27/85.	$ 2,000
STONECO, INC. (Shipper)	Offered a hazardous material for transportation in commerce which was not: properly classified, labeled (no label affixed to package), marked and described on the shipping papers (incorrect shipping name and hazard class omitted) [Section 172.202(a)(1)(2) - 4 counts; 172.301(a) 1 count; 172.400(a) - 1 count]. Date Concluded 10/10/84.	$ 8,800
T. I. CHESTERFIELD, LTD. (Foreign Cylinder Manufacturer)	Manufactured, marked, and sold DOT specification 3AA cylinders which were improperly marked with a service pressure that was 30 percent above the design service pressure entered on the inspector's reports. [178.37-20(a)(2) - 4 counts]. Date Concluded 7/16/85.	$12,000

WHITMIRE RESEARCH LABORATORIES, INC. (Cylinder Manufacturer)	Represented, marked, and certified DOT specification 39 cylinders as meeting that specification when: a required pressure test was not being performed at the correct pressure, markings on the cylinders were not the correct size and inspectors report did not include information about the pressure test or its results. [Section 178.65-2(d), 178.65-11(a) - 1 count; 178.16-14(c)- 1 count; 178.65-15(b)- 1 count]. Date Concluded 11/6/84.	$ 2,625
		RSPA TOTAL $127,925

* - Closed in FY-1986

UNITED STATES COAST GUARD

ANTILLEAN MARINE SHIPPING CORP. (Operator of waterfront facility)	A designated waterfront facility handled dangerous cargo while not in compliance with the regulations, and stored improperly labeled hazardous materials on the facility. 1 count each of 33 CFR 126.13, and 126.27(h). Concluded 7/10/85.	$ 500
ARAB MARITIME PETROLEUM TRANSPORT CO. (Carrier)	T/V UMM SHAIF carried crude oil in U.S. waters without the required evidence of acceptance of their Crude Oil Wash (COW) system, and no approved operations manual. 1 count each of 33 CFR 157.118(b) and 33 CFR 118(a)(2). Concluded 11/29/85.	$ 8,000
B.F. GOODRICH CO. (Waterfront facility)	A waterfront facility loaded a tank barge with caustic soda using a cargo hose not inspected for leakage, and failed to maintain cargo equipment in good operating condition, resulting in a spill. 1 count each of 46 CFR 151.45-4(e)(3), and 33 CFR 126.13. Concluded 1/10/85.	$ 4,000
BROTANK-GOTHENBURG/SWEDEN (Carrier)	T/V CROWN KAPAL transferred oil with incomplete oil transfer procedures and with no record of required cargo piping tests. 1 count each of 33 CFR 155.750 and 155.820(b). Concluded 11/21/85.	
CASA BERNARDO, LTD. (Shipper)	Offered a hazardous material for water shipment which was not packaged in compliance with the hazardous materials regulations. Shipment involved a flammable solid, aluminum phosphide, that leaked and exploded at the importing facility during transportation due to improper packaging. Resulted in 1 death. 1 count of violation of 49 CFR 171.2(a). Concluded 8/1/85.	$ 5,000
CIBRO TERMINALS, INC. (Waterfront facility)	A facility transferred oil through system not tested in last the year and person in charge did not have an operations manual. 1 count each of 33 CFR 156.170(a), and 33 CFR 120(t)(2). Concluded 11/29/85.	$ 8,000
FEDERAL COMMERCE AND NAVIGATION	Improperly prepared Dangerous Cargo Manifest. Dangerous cargo on board and not specified as such on manifest. Containers on board contained non-dangerous cargo and placarded as hazardous cargo. 49 CFR 176.30(a) and 172.401(a)(1)	$ 1,000
PITTSTON MARINE TRANSPORT CORP. (Operator)	A tank vessel did not blank-off the unused part of their oil transfer system during an oil transfer. 1 count of 33 CFR 156.120(e). Concluded 6/21/85.	$ 2,500
POLING TRANSPORTATION CORP. (Owner-operator)	Tank barge POLING BROTHERS No. 23 had neither the required communications systems nor the required person in charge at the transfer site during an oil transfer. 1 count each of 33 CFR 156.120(q) and 156.120(t)(1). Concluded 6/11/85.	$ 1,500
SAMSON TUG & BARGE COMPANY INC. (Carrier)	Improper stowage of explosives on freight barge EDGECUMBE. Stowage did not provide for last on and first off cargo handling. 1 count of 49 CFR 176.105(a). Concluded 6/24/85.	$ 500
SKAATUN, EDVARD (Vessel master)	The M/V TFL LIBERTY's Dangerous Cargo Manifest was not in a holder near the bridge and available for USCG inspection. 1 count of 49 CFR 176.30(a). Concluded 4/23/85.	$ 1,000
SPENTONBUSH/RED STAR COMPANIES (Operator)	The T/B HYGRADE 22 conducted oil transfer operations without the required persons in charge present. 1 count of 33 CFR 156.160(c). Concluded 11/1/85.	$ 1,000
STOLT-NIELSEN, INC. (Operator)	The T/V STOLT PRIDE did not secure the unused part of their oil transfer system during an oil transfer. 1 count of 33 CFR 156.120(e). Concluded 11/19/85.	$ 2,500
STOLT-NIELSEN, INC. (Operator)	The T/V STOLT EAGLE conducted oil transfer operations with several equipment and procedural requirements not met, including: tanks open or unsecured without flame screens; no drip pans under hose connections; cargo connections made through an open ended hose placed in hatch; unused hoses not blanked-off; cargo hoses not properly supported; transfer system not properly secured; containment not drained (overflowing); leaking hose connection; transfer continued after discharge without COTP authority; temporary hose connections did not have the required number of bolts; permanent hose connections did not have the required number of bolts; the Declaration of Inspection was not signed	$59,500

	by the person in charge; use of vessel in negligent manner so as to endanger life, limb or property. 1 count each of 46 CFR 35.30-10, 35.35-15(c), and 35.35-20(d), 1 count of 33 CFR 155.805, 1 count each of 33 CFR 156.120(c), 156.120(e), 156.120(n), 156.120(p), and 1 count each of 33 CFR 156.125(a)(1), 156.130(a)(3), 156.130(a)(4), 156.150(a) and 46 U.S.C. 1461(d). Concluded 8/30/85.	
STREETT INDUSTRIES, INC. (Operator waterfront facility)	An oil transfer facility conducted oil transfer operations without designating a person in charge, without suitable communications with the transferring vessel, and without providing the required cargo information cards. 1 count each of 33 CFR 154.710(a), 154.560. Concluded 3/27/85.	$ 1,100
TAMPA TUG CORP. (Operator)	A tank barge, HANNAH S101, loaded oil in bulk was missing the required flame screens on tank vents, and the person in charge was not at the transfer site or immediately available, as required by the regulations. 1 count each of 46 CFR 35.30-10, and 33 CFR 156.120(t)(1). Concluded 12/16/85.	$ 3,000
UNIVERSAL TERMINALS (Shipper)	Offered a hazardous material for shipment as general cargo, with improper shipping name on package and container not placarded. 1 count each of 49 CFR 172.202(a) and 172.504(a). Concluded 6/1/85.	$ 5,000
	USCG TOTAL	$104,100

This listing does not represent all Coast Guard hazardous materials violations cases opened and completed during the time covered by this document.

Total of all Department of Transportation Penalties collected $1,404,100

☆ U.S. Government Printing Office: 1986—491-810/20813

U.S. Department
of Transportation

**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

BULK MAIL
POSTAGE & FEES PAID
RESEARCH & SPECIAL PROGRAMS
ADMINISTRATION
PERMIT NO. G-126

RETURN POSTAGE GUARANTEED

Official Business
Penalty for Private Use $300

NCCADEPT A D 9999 001
DEPT OF THE NAVY
COMMANDING GENERAL
MARINE CORPS BASE
CAMP LEJEUNE NC 28542-5079

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

6240
NREAD
10 Sep 86

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

Subj: INSPECTION REPORT ON LONG TERM HAZARDOUS WASTE STORAGE FACILITIES AT BUILDINGS TP-451 and TP-463

Ref: (a) Onsite inspection by Mr. Becker, NREAD, and Mr. Eggers, DRMO
(b) CG MCB ltr FAC/REA/hf 6280 of 15 Jul 83

Encl: (1) Inspection Checklist for Long Term Hazardous Waste Storage Facilities at Buildings TP-451 and TP-463

1. The enclosure provides results of reference (a) as required by refernce (b). It was noted that four hazardous waste labels did not have EPA ID nos. or EPA Waste nos. on them. This discrepancy was corrected on the spot. Point of contact in this matter is Mr. Danny Becker, NREAD, extensions 5003/2083.

J. I. WOOTEN
By direction

Copy to:
AC/S FAC
BFIRECHIEF
SJA
BMO
BSAFETYMGR

INSPECTION CHECKLIST FOR LONG TERM HAZARDOUS WASTE/MATERIALS STORAGE FACILITIES AT TF-451/TP/463

PARTICIPANTS Beckers, Barbee, Eggers

DATE: 10 Sep 1986

FACILITIES AND EQUIPMENT	SAT	UNSAT	COMMENTS
. FACILITY GROUNDS	X		
. FACILITY SECURITY (LOCKS, DOORS, SIGNS, ETC.)	X		
. EMERGENCY TELEPHONE AND FIRE ALARMS	X		
. [redacted]NLOADING PAD DRAIN VALVE	X		Dirt & sediment needs to be cleaned out
. EXHAUST FANS	X		
. INTERIOR LIGHTING AND ELECTRICAL OUTLETS	X		
. SAFETY SHOWERS/ EYE LAVAGES	X		
. CURBS, GRATES, OTHER FIXTURES	X		
. [redacted]ON-SPARKING SHOVELS (2)	X		
10. ABSORBENT (EQUIVALENT OF FOUR 55-GAL BARRELS)	X		
11. HAZ MAT PUMPS OR EQUIVALENT	X		
12. FIRE EXTINGUISHERS	X		
13. PROTECTIVE GEAR AND EQUIPMENT	X		
14. EMPTY CONTAINERS AND OVERPACK DRUMS	X		ENCLOSURE (1)

OPERATIONAL CONSIDERATIONS	SAT	UNSAT	COMMENTS
1. Required operator inspections and Inspection Log	X		
2. Emergency Contingency Plan Posting & Operator Familiarity	X		
3. Fire Department Phone number posting	X		
4. Condition of containers in use	X		
5. Presence of odors/vapors, residues in sumps, deck, etc.	X		
6. Unloading Pad Valve Operation	X		
7. Compatibility of Material Storage	X		
8. Implementation of previously recommended corrective action	X		
9. Facility Operators since last Inspection	X		George Eggers

ADDITIONAL COMMENTS, EXPLANATIONS, ETC:

Operator must ensure that Hazardous Waste labels are visible from isles. Operator must ensure that Hazardous Waste labels are completely filled out upon receipt.

6240
NREAD
10 Sep 86

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

Subj: INSPECTION REPORT ON LONG TERM HAZARDOUS WASTE STORAGE FACILITIES AT BUILDINGS TP-451 and TP-463

Ref: (a) Onsite inspection by Mr. Becker, NREAD, and Mr. Eggers, DRMO
(b) CG MCB ltr FAC/REA/hf 6280 of 15 Jul 83

Encl: (1) Inspection Checklist for Long Term Hazardous Waste Storage Facilities at Buildings TP-451 and TP-463

1. The enclosure provides results of reference (a) as required by refernce (b). It was noted that four hazardous waste labels did not have EPA ID nos. or EPA Waste nos. on them. This discrepancy was corrected on the spot. Point of contact in this matter is Mr. Danny Becker, NREAD, extensions 5003/2083.

J. I. WOOTEN
By direction

Copy to:
AC/S FAC
BFIRECHIEF
SJA
BMO
BSAFETYMGR

INSPECTION CHECKLIST FOR LONG TERM HAZARDOUS WASTE/MATERIALS STORAGE FACILITIES AT TF-451/TP/463

PARTICIPANTS Beckers, Barbee, Eggers

DATE: 10 Sep 1986

FACILITIES AND EQUIPMENT	SAT	UNSAT	COMMENTS
1. FACILITY GROUNDS	X		
2. FACILITY SECURITY (LOCKS, DOORS, SIGNS, ETC.)	X		
3. EMERGENCY TELEPHONE AND FIRE ALARMS	X		
4. [redacted]LOADING PAD DRAIN VALVE	X		Dirt & sediment needs to be cleaned out
5. EXHAUST FANS	X		
6. INTERIOR LIGHTING AND ELECTRICAL OUTLETS	X		
7. SAFETY SHOWERS/ EYE LAVAGES	X		
8. CURBS, GRATES, OTHER FIXTURES	X		
9. [redacted]ON-SPARKING SHOVELS (2)	X		
10. ABSORBENT (EQUIVALENT OF FOUR 55-GAL BARRELS)	X		
11. HAZ MAT PUMPS OR EQUIVALENT	X		
12. FIRE EXTINGUISHERS	X		
13. PROTECTIVE GEAR AND EQUIPMENT	X		
14. EMPTY CONTAINERS AND OVERPACK DRUMS	X		

ENCLOSURE (1)

OPERATIONAL CONSIDERATIONS	SAT	UNSAT	COMMENTS
1. Required operator inspections and Inspection Log	X		
2. Emergency Contingency Plan Posting & Operator Familiarity	X		
3. Fire Department Phone number posting	X		
4. Condition of containers in use	X		
5. Presence of odors/vapors, residues in sumps, deck, etc.	X		
6. Unloading Pad Valve Operation	X		
7. Compatibility of Material Storage	X		
8. Implementation of previously recommended corrective action	X		
9. Facility Operators since last Inspection	X		George Eggers

ADDITIONAL COMMENTS, EXPLANATIONS, ETC:

Operator must ensure that Hazardous Waste labels are visible from isles. Operator must ensure that Hazardous Waste labels are completely filled out upon receipt.

Julian -
Sue call this
A.M. wanted to revise this pg a little
Per Elston - will be used as a handout at the Commander's Brief tomorrow!
FYI!

9/9/86

Col Dalzell 10 Sept 86 meeting of Area C.O.'s

Gal W Files

LING OF HAZARDOUS WASTES

ronmental Protection Agency (EPA)
veral problems with the Hazardous
rd Camp Lejeune. Base is currently
nt with the regulatory agency.

of EPA regulations were identified.
would be classified as major,
ed will require significant input

involved. Only diligent effort
fficers and Base environmental
otect our Commanding Officers.
waste training to personnel at all
levels is essential if satisfactory compliance is to be achieved.

4. The violations we are most concerned about are at the generating shop level. Any military organizations routinely handling solvents, degreasers, paint, PQL's, NBC supplies, etc. have specific EPA regulatory requirements to meet. BO 6240.5 sets forth the Base program to manage hazardous wastes.

5. You can expect more frequent inspections of hazardous waste generation and storage areas, both by outside regulatory agencies and by Base.

6. While many aspects of hazardous waste management are outside your control as Area Commanders, you can help us with this matter. We request that you pay special attention to the following:

a. Policing and security of hazardous material storage areas.

b. Ensuring that containers, particularly drums, are properly marked as to content and hazards. Chemical-like substances in unmarked containers should raise a red flag to us all. This situation combined with personnel turnover quickly leads to problems. Unknown chemicals require expensive analysis. We can not legally and/or safely manage a chemical until we know what it is.

c. All areas where hazardous wastes are stored must be inspected weekly and a written record kept. Problems must be promptly corrected.

d. At present, hazardous waste may not be stored for over 90 days from date they are generated. They must be moved to authorized storage facility operated by Defense Reutilization and Marketing Officer or to off Base permitted facility.

e. Hazardous material or waste spills should be promptly reported to Base Fire Department at 451-3333.

In summary, we ask you to become familiar with where and how hazardous materials are being used within your cognizance and what wastes are being generated. Above all, please feel free to call on my environmental staff member, Mr. Danny Sharpe, x2083, for assistance.

Col Dalzell 10 Sept 86 Meeting of Area C.O.'s
Gal W
Files

SAFE, LEGAL HANDLING OF HAZARDOUS WASTES

1. An inspection by the Environmental Protection Agency (EPA) on 26 June 1986 identified several problems with the Hazardous Waste Management Program aboard Camp Lejeune. Base is currently negotiating a Consent Agreement with the regulatory agency.

2. Several minor violations of EPA regulations were identified. While no individual violation would be classified as major, collectively, issues identified will require significant input of resources to correct.

3. All levels of command are involved. Only diligent effort and cooperation between S-4 Officers and Base environmental and support personnel will protect our Commanding Officers. Providing required hazardous waste training to personnel at all levels is essential if satisfactory compliance is to be achieved.

4. The violations we are most concerned about are at the generating shop level. Any military organizations routinely handling solvents, degreasers, paint, PQL's, NBC supplies, etc. have specific EPA regulatory requirements to meet. BO 6240.5 sets forth the Base program to manage hazardous wastes.

5. You can expect more frequent inspections of hazardous waste generation and storage areas, both by outside regulatory agencies and by Base.

6. While many aspects of hazardous waste management are outside your control as Area Commanders, you can help us with this matter. We request that you pay special attention to the following:

a. Policing and security of hazardous material storage areas.

b. Ensuring that containers, particularly drums, are properly marked as to content and hazards. Chemical-like substances in unmarked containers should raise a red flag to us all. This situation combined with personnel turnover quickly leads to problems. Unknown chemicals require expensive analysis. We can not legally and/or safely manage a chemical until we know what it is.

c. All areas where hazardous wastes are stored must be inspected weekly and a written record kept. Problems must be promptly corrected.

d. At present, hazardous waste may not be stored for over 90 days from date they are generated. They must be moved to authorized storage facility operated by Defense Reutilization and Marketing Officer or to off Base permitted facility.

e. Hazardous material or waste spills should be promptly reported to Base Fire Department at 451-3333.

In summary, we ask you to become familiar with where and how hazardous materials are being used within your cognizance and what wastes are being generated. Above all, please feel free to call on my environmental staff member, Mr. Danny Sharpe, x2083, for assistance.

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U U L A S S I F I E D
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

T-6240

ROUTINE

R 301846Z SEP 85

FM CG MCB CAMP LEJEUNE NC

TO CG SECOND MARDIV
CG SECOND FSSG
NAVHOSP CAMP LEJEUNE NC
MCB CAMP LEJEUNE NC
CG SIXTH MAB
MCAS NEW RIVER NC
NAVDENCLINIC CAMP LEJEUNE NC

INFO HQ NUC II MAF

UNCLAS //N06280//

SUBJ: HAZARDOUS WASTE MANAGEMENT

A. BO 6240.5
B. RESOURCE CONSERVATION AND RECOVERY ACT
C. CG MCB CLNC LTR 6240 NREAD OF 9 SEP 85

1. REF (A) IMPLEMENTED FEDERAL AND STATE HAZARDOUS WASTE REGULATIONS PROMULGATED UNDER REF (B). ON 5 SEP 85, AN ONSITE INSPECTION WAS CONDUCTED BY NC REGULATORY PERSONNEL. TWO TYPES OF DISCREPANCIES WERE IDENTIFIED RELATIVE TO INDUSTRIAL OR MAINTENANCE SHOPS ON BASE WHICH GENERATE HAZARDOUS WASTE (HW).

2. FIRST, DOCUMENTATION WAS NOT AVAILABLE TO INDICATE IF ADEQUATE HW TRNG WAS BEING PROVIDED TO SHOP PERSONNEL HANDLING HW. REF (A) REQUIRES OIC/CMDRS TO PROVIDE THIS TRNG TO SHOP PERSONNEL.

3. SECOND, REQUIRED LOGS (RECORDS) WERE NOT AVAILABLE TO DOCUMENT THAT WEEKLY INSPECTIONS (SEE PARA 4A(5) OF REF (A)) WERE BEING CONDUCTED OF HW STORAGE CONTAINERS AT THE SHOP LEVEL.

4. ON OR ABOUT 16 OCT 85, THE STATE INSPECTOR WILL BE VISITING

DLVR:CG SIXTH MAB(6)...ACT
DLVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...ACT
DLVR:NAVHOSP CAMP LEJEUNE NC(4)...ACT
DLVR:HQ NUC II MAF(7)...INFO

NREA(2)...ORIG FOR CG MCB CAMP LEJEUNE(125) /13/
BFAC(1) GSTF(12) SSTF(92) OCDR(14) BCOS(1) BSDO(1) CEOB(1)
OICB(1)

RTD:000-000/COPIES:0146

272843/274 1 OF 2 MATA0210 274/10:45Z 301846Z SEP 85
CSN:RXIC00019 CG MCB CAMP LE

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U U N C L A S S I F I E D U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

SEVERAL SHOPS WITHIN THE CAMP LEJEUNE/MCAS, NEW RIVER COMPLEX. WHILE THE INSPECTION WILL FOCUS ON PERSONNEL TPNG AND WEEKLY HW INSPECTIONS ANY VIOLATIONS OBSERVED ARE LIKELY TO BE CITED. IT SHOULD BE ANTICIPATED THAT OIC'S AND OTHER RESPONISBLE SHOP PERSONNEL WILL BE CITED IF THE VIOLATION IS A RESULT OF THEIR FAILURE TO IMPLEMENT REF (A) PROPERLY. ADDRESSEES WILL BE NOTIFIED ASAP WHICH SHOPS THE STATE INSPECTOR PLANS TO VISIT.

5. REF (C) PROVIDED SPECIFIC BACKGROUND AND GUIDANCE TO HAZARDOUS MATERIAL DISPOSAL COORDINATORS (HMDC'S) FOR EACH CMD. OIC'S OR CMDRS WITH QUESTIONS REGARDING THIS MATTER SHOULD CONTACT THEIR HMDC.

6. HMDC'S FOR MAJOR CMDS ARE:
   A. MCB - CAPT OWENS, AC/S LOG, EXT 2535
   B. SECOND MARDIV - LTCOL MARAPOTI, DIV ENG, EXT 2755
   C. SECOND FSSG - MAJ D. R. SHEPHERD, ENG SUP OFFICE, EXT 3456
   D. MCAS, NEW RIVER (AND TENANTS) - MS. MARY WHEAT, GROUND SAFETY OFFICE, EXT 6518
   E. NAVHOSP - MR. GREG WINTERS, O AND PM DEPT, EXT 2707
   F. NAVDENCLINIC - DTC RICHARD PANEPINTO, EXT 5314

7. BASE ENVIRONMENTAL PERSONNEL ARE AVAILABLE TO ASSIST OIC'S EVALUATE THEIR SHOPS RELATIVE TO COMPLIANCE WITH REFS (A) AND (B). OIC'S SHOULD SUBMIT REQUESTS TO THEIR HMDC. HMDC'S SHOULD ESTABLISH PRIORITIES FOR SHOP VISITS. BASE ENVIRONMENTAL PERSONNEL WILL SCHEDULE SHOP VISITS IN COOPERATION WITH HMDC'S. SHOP VISITS WILL NOT BE SCHEDULED UNLESS APPROPRIATE SHOP SUPERVISORY PERSONNEL ARE AVAILABLE. APPROXIMATELY ONE-TWO HOURS PER SHOP VISIT SHOULD BE ANTICIPATED.

8. POC IN THIS MATTER IS MR. DANNY SHARPE, NREAD, EXT 2083. IT IS REQUESTED THAT THE WIDEST POSSIBLE LOCAL DISTRIBUTION BE GIVEN TO THIS MSG.

BT

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT		CIC	ORIG MSG IDENT
DATE-TIME	MONTH	YR	ACT	INFO					
X 01 03			RR		UUUU				2671400 X

MESSAGE HANDLING INSTRUCTIONS

FROM: CG MCB CAMP LEJEUNE NC

TO: CG SECOND MARDIV

CG SIXTH MAB

CG SECOND FSSG

MCAS NEW RIVER

NAVHOSP CAMP LEJEUNE NC

NAVDENCLINIC CAMP LEJEUNE NC

MCB CAMP LEJEUNE NC

CG II MAF

INFO HQ NUC II MAF

TWO TWO MAU

UNCLAS //N06280//

SUBJ: HAZARDOUS WASTE MANAGEMENT

A. BO 6240.5

B. RESOURCE CONSERVATION AND RECOVERY ACT

C. CG MCB CLNC LTR 6240 NREAD OF 9 SEP 85

1. REF (A) IMPLEMENTED FEDERAL AND STATE HAZARDOUS WASTE REGULATIONS PROMULGATED UNDER REF (B). ON 5 SEP 85, AN ONSITE INSPECTION WAS CONDUCTED BY NC REGULATORY PERSONNEL. TWO TYPES OF DISCREPANCIES WERE IDENTIFIED RELATIVE TO INDUSTRIAL OR MAINTENANCE SHOPS ON BASE WHICH GENERATE HAZARDOUS WASTE (HW).

|NREA|BFAC|GSTF|SSTF|OCDR|CEOB|OICB|BSDO|

TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

J. I. WOOTEN, NREA, GS-12, 5003

30 SEP 1985

RELEASED BY (TYPED NAME, TITLE, OFFICE SYMBOL AND PHONE)

R. A. TIEBOUT, AC/S FAC, 3034

SPECIAL INSTRUCTIONS

SJA ——— FAC ———

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE TIME GROUP

NAVMC 1731/2 (OCR) PREVIOUS EDITION IS OBSOLETE S/N 0102-LF-000-1736

☆U.S. GOVERNMENT PRINTING OFFICE: 1984-430-737

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	CIC	ORIG/MSG IDENT
DATE TIME	MONTH	YR	ACT	INFO					
X 02 03			RR		UUUU				2671400

MESSAGE HANDLING INSTRUCTIONS

2. FIRST, DOCUMENTATION WAS NOT AVAILABLE TO INDICATE IF ADEQUATE HW TRNG WAS BEING PROVIDED TO SHOP PERSONNEL HANDLING HW. REF {A} REQUIRES OIC/CMDRS TO PROVIDE THIS TRNG TO SHOP PERSONNEL.

3. SECOND, REQUIRED LOGS {RECORDS} WERE NOT AVAILABLE TO DOCUMENT THAT WEEKLY INSPECTIONS {SEE PARA 4A{5} OF REF {A}} WERE BEING CONDUCTED OF HW STORAGE CONTAINERS AT THE SHOP LEVEL.

4. ON OR ABOUT 16 OCT 85, THE STATE INSPECTOR WILL BE VISITING SEVERAL SHOPS WITHIN THE CAMP LEJEUNE/MCAS, NEW RIVER COMPLEX. WHILE THE INSPECTION WILL FOCUS ON PERSONNEL TRNG AND WEEKLY HW INSPECTIONS ANY VIOLATIONS OBSERVED ARE LIKELY TO BE CITED. IT SHOULD BE ANTICIPATED THAT OIC'S AND OTHER RESPONISBLE SHOP PERSONNEL WILL BE CITED IF THE VIOLATION IS A RESULT OF THEIR FAILURE TO IMPLEMENT REF {A} PROPERLY. ADDRESSEES WILL BE NOTIFIED ASAP WHICH SHOPS THE STATE INSPECTOR PLANS TO VISIT.

5. REF {C} PROVIDED SPECIFIC BACKGROUND AND GUIDANCE TO HAZARDOUS MATERIAL DISPOSAL COORDINATORS {HMDC'S} FOR EACH CMD. OIC'S OR CMDRS WITH QUESTIONS REGARDING THIS MATTER SHOULD CONTACT THEIR HMDC.

6. HMDC'S FOR MAJOR CMDS ARE:

A. MCB - CAPT OWENS, AC/S LOG, EXT 2535

DISTR

RELEASED BY NAME, TITLE, OFFICE SYMBOL, PHONE	SPECIAL INSTRUCTIONS
AUTHENTICATED BY NAME, TITLE, OFFICE SYMBOL AND PHONE	
	SECURITY CLASSIFICATION: UNCLASSIFIED / DATE TIME GROUP

NAVMC 1732 (OCR)

PREVIOUS EDITION IS OBSOLETE
S/N 0102-LF-000-1735

☆U.S. GOVERNMENT PRINTING OFFICE: 1984-430-737

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT		CIC	ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO					
X 03 03				RR		UUUU				2671400

MESSAGE HANDLING INSTRUCTIONS

B. SECOND MARDIV - LTCOL MARAPOTI, DIV ENG, EXT 2755

C. SECOND FSSG - MAJ D. R. SHEPHERD, ENG SUP OFFICE, EXT 3456

D. MCAS, NEW RIVER (AND TENANTS) - MS. MARY WHEAT, GROUND SAFETY OFFICE, EXT 6518

E. NAVHOSP - MR. GREG WINTERS, O AND PM DEPT, EXT 2707

F. NAVDENCLINIC - DTC RICHARD PANEPINTO, EXT 5314

7. BASE ENVIRONMENTAL PERSONNEL ARE AVAILABLE TO ASSIST OIC'S EVALUATE THEIR SHOPS RELATIVE TO COMPLIANCE WITH REFS (A) AND (B). OIC'S SHOULD SUBMIT REQUESTS TO THEIR HMDC. HMDC'S SHOULD ESTABLISH PRIORITIES FOR SHOP VISITS. BASE ENVIRONMENTAL PERSONNEL WILL SCHEDULE SHOP VISITS IN COOPERATION WITH HMDC'S. SHOP VISITS WILL NOT BE SCHEDULED UNLESS APPROPRIATE SHOP SUPERVISORY PERSONNEL ARE AVAILABLE. APPROXIMATELY ONE-TWO HOURS PER SHOP VISIT SHOULD BE ANTICIPATED.

8. POC IN THIS MATTER IS MR. DANNY SHARPE, NREAD, EXT 2083. IT IS REQUESTED THAT THE WIDEST POSSIBLE LOCAL DISTRIBUTION BE GIVEN TO THIS MSG.

RELEASED BY (TYPED NAME, TITLE, OFFICE SYMBOL, PHONE)

SPECIAL INSTRUCTIONS

RELEASED BY (SIGNATURE, TYPED NAME, OFFICE SYMBOL AND PHONE)

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE TIME GROUP

NAVMC 178/3 (OCR) PREVIOUS EDITION IS OBSOLETE S/N 0102-LF-000-1735

U.S. GOVERNMENT PRINTING OFFICE: 1984-430-737

MESSAGE FORM

SECURITY CLASSIFICATION: UNCLASSIF[redacted]

PRECEDENCE		CLASS	SPECAT		CIC	ORIG/MSG IDENT
ACT	INFO					
RR		UUUU				2610900

X 01 03

X

MESSAGE HANDLING INSTRUCTIONS

CG MCB CAMP LEJEUNE NC

MCB CAMP LEJEUNE NC

CG SECOND MARDIV

CG SIXTH MAB

CG SECOND FSSG

MCAS NEW RIVER

NAVHOSP CAMP LEJEUNE NC

NAVDENCLINIC CAMP LEJEUNE NC

Proposed

UNCLAS //N06280//

SUBJ: HAZARDOUS WASTE MANAGEMENT

A. BO 6240.5

B. RESOURCE CONSERVATION AND RECOVERY ACT

C. CG MCB CLNC LTR 6240 NREAD OF 9 SEP 85

1. REF A IMPLEMENTED FEDERAL AND STATE HAZARDOUS WASTE REGULATIONS PROMULGATED UNDER REF B. ON 5 SEP 85 AN ONSITE INSPECTION WAS CONDUCTED BY NC REGULATORY PERSONNEL. TWO TYPES OF DISCREPANCIES WERE IDENTIFIED RELATIVE TO INDUSTRIAL OR MAINTENANCE SHOPS ON BASE WHICH GENERATE HAZARDOUS WASTE (HW).

2. FIRST, DOCUMENTATION WAS NOT AVAILABLE TO INDICATE IF ADEQUATE

|NREA|BFAC|GSTF|SSTF|OCDR|CEOB|OICB|BSDO|

J. WOOTEN, NREA, GS-12, 5003

R. A. TIEBOUT, COL, AC/S FAC

SPECIAL INSTRUCTIONS

SJA ——— FAC ———

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE TIME GROUP

PREVIOUS EDITION IS OBSOLETE
S/N 0102-LF-000-1735
U.S. GOVERNMENT PRINTING OFFICE: 1984-430-73

HW TRAINING WAS BEING PROVIDED TO SHOP PERSONNEL HANDLING HW. REF A REQUIRES OIC/COMMANDERS TO PROVIDE THIS TRAINING TO SHOP PERSONNEL.

3. SECOND, REQUIRED LOGS WERE NOT AVAILABLE TO DOCUMENT THAT WEEKLY INSPECTIONS (SEE PARA 4A(5) OF REF A) WERE BEING CONDUCTED OF HW STORAGE CONTAINERS AT THE SHOP LEVEL.

4. ON OR ABOUT 16 OCT 85, THE STATE INSPECTOR WILL BE VISITING [redacted] SEVERAL SHOPS WITHIN THE CAMP LEJEUNE/MCAS, NEW RIVER COMPLEX. WHILE [redacted] THE INSPECTION WILL FOCUS ON PERSONNEL TRAINING AND WEEKLY HW INSPECTIONS, ANY VIOLATIONS OBSERVED ARE LIKELY TO BE WRITTEN UP. IT SHOULD BE ANTICIPATED THAT OIC'S AND OTHER RESPONSIBLE SHOP PERSONNEL WILL BE ~~WRITTEN UP~~ cited IF THE VIOLATION IS A RESULT OF THEIR FAILURE TO IMPLEMENT REF A PROPERLY. ADDRESSEES WILL BE NOTIFIED ASAP WHICH SHOPS THE STATE INSPECTOR PLANS TO VISIT.

5. REF C PROVIDED SPECIFIC BACKGROUND AND GUIDANCE TO HAZARDOUS MATERIAL DISPOSAL COORDINATORS (HMDC'S) FOR EACH COMMAND. OIC'S OR COMMANDERS WITH QUESTIONS REGARDING THIS MATTER SHOULD CONTACT THEIR HMDC.

6. HMDC'S FOR MAJOR COMMANDS ARE:

A. MCB - CAPT OWENS, AC/S LOG, EXT 2535 Sep

MESSAGE FORM

SECURITY CLASSIFICATION: UNCLASSIFIED

PRECEDENCE	CLASS	SPECAT	CIC	ORIG MSG IDENT
OR SET INFO				
RR	UUUU			2610900 Z

MESSAGE HANDLING INSTRUCTIONS

B. SECOND MARDIV - LTCOL MARAPOTI, DIV ENGINEERS, EXT 2755 MA

C. SECOND FSSG - MAJ D. R. ~~SHEPARD~~ SHEPHERD, ENG SUPPORT OFFICE, EXT 3456 DS

D. MCAS NEW RIVER (AND TENANTS), MS. MARY WHEAT, GROUNDS SAFETY OFFICE, EXT 6518 MW

E. NAVHOSP - ~~LT BYRNES~~ MR GREG WINTERS, OANDPM DEPT, EXT 2707 GW

F. NAVDENCLINIC - DTC RICHARD PANEPINTO, EXT 5314 RP

7. BASE ENVIRONMENTAL PERSONNEL ARE AVAILABLE TO ASSIST OIC'S EVALUATE THEIR SHOPS RELATIVE TO COMPLIANCE WITH REF A AND B. OIC'S SHOULD SUBMIT THIER REQUESTS TO THEIR HMDC. HMDC'S SHOULD ESTABLISH PRIORITIES FOR SHOP VISITS. BASE ENVIRONMENTAL PERSONNEL WILL SCHEDULE SHOP VISITS IN COOPERATION WITH HMDC'S. SHOP VISITS WILL NOT BE SCHEDULED UNLESS APPROPRIATE SHOP SUPERVISORY PERSONNEL ARE AVAILABLE. APPROXIMATELY 1-2 HOURS PER SHOP VISIT SHOULD BE ANTICIPATED.

8. POC IN THIS MATTER IS MR. DANNY SHARPE, NREAD, TELEPHONE EXT 2083 IT IS REQUESTED THAT THE WIDEST POSSIBLE LOCAL DISTRIBUTION BE GIVEN TO THIS MSG.

SPECIAL INSTRUCTIONS

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE/TIME GROUP

DDS
gdw - PCB info

File

CAROLINA POWER & LIGHT CO.
P.O. BOX 9
JACKSONVILLE, N.C. 28540

FIRE PROTECTION DIVISION
MCAB CAMP LEJUNE BLDG. 18
CAMP LEJUNE, N.C.
ATTI BASE FIRE CHIEF

DEAR SIR:

I AM SENDING YOU THIS INFORMATION ON THE QUANTITY OF PCB FLUIDS AT OUR CAMP LEJUNE 230/12 KV SUBSTATION AND CAMP GEIGER 115/12 KV SUBSTATION AT THE REQUEST OF MR. RAY FRENCH OF 10-28-86.

CAMP LEJUNE 230/12 KV SUBSTATION -
APPROXIMATELY 950 GALLONS OF FLUID DISTRIBUTED AMONG 269 INDIVIDUAL CAPACITATORS

CAMP GEIGER 115/12 KV SUBSTATION -
APPROXIMATELY 460 GALLONS OF FLUID DISTRIBUTED AMONG 132 INDIVIDUAL CAPACITATORS.

IF YOU HAVE ANY QUESTIONS OR NEED FURTHER ASSISTANCE CALL ME AT 347-4301.

THANK YOU,
DAN D. CLAYTON
SUBSTATION MAINTENANCE FOREMAN, JACKSONVILLE.

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

DEPARTMENT OF THE NAVY

Memorandum

6240
NREAD

DATE: 12 Sep 1986

FROM: Danny Sharpe, Supervisory Ecologist

TO: MEMO FOR THE RECORD

SUBJ: EPA LTR DATED 14 AUGUST 1986

1. Be advised that the Supervisory Ecologist upon recommendation of the Assistant Chief of Staff, Facilities, reviewed the HW Inspection Report contained in the subject letter with Mr. Paul Hubbell, HQMC, during a phonecon on or about 5 Sep 1986. I advised Mr. Hubbell of the substance of the violations and the nature of the corrective action Base Officials were going to propose during a planned meeting with State Regulatory personnel on 8 Sep 1986. Mr. Hubbell concurred in the planned approach for dealing with the State HW Regulatory Agency.

2. Also be advised that a copy of the subject letter was informally forwarded to Mr. Hubbell by Director, NREAD, pursuant to AC/S, Facilities concurrence.

DANNY D. SHARPE

Copy to:
SJA

* U.S. GOVERNMENT PRINTING OFFICE: 1983-605-010:8460

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

DEPARTMENT OF THE NAVY

Memorandum

6240
NREAD

DATE: 12 Sep 1986

FROM: Danny Sharpe, Supervisory Ecologist

TO: MEMO FOR THE RECORD

SUBJ: EPA LTR DATED 14 AUGUST 1986

1. Be advised that the Supervisory Ecologist upon recommendation of the Assistant Chief of Staff, Facilities, reviewed the HW Inspection Report contained in the subject letter with Mr. Paul Hubbell, HQMC, during a phonecon on or about 5 Sep 1986. I advised Mr. Hubbell of the substance of the violations and the nature of the corrective action Base Officials were going to propose during a planned meeting with State Regulatory personnel on 8 Sep 1986. Mr. Hubbell concurred in the planned approach for dealing with the State HW Regulatory Agency.

2. Also be advised that a copy of the subject letter was informally forwarded to Mr. Hubbell by Director, NREAD, pursuant to AC/S, Facilities concurrence.

DANNY D. SHARPE

Copy to:
SJA

☆ U.S. GOVERNMENT PRINTING OFFICE: 1983-605-010:8460

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

PART	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	CIC	ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO					
01 OF 03				RR		UUUU				2960930

BOOK

MESSAGE HANDLING INSTRUCTIONS

FROM: CG MCB CAMP LEJEUNE NC

TO: CG SECOND MARDIV

CG SIXTH MAB

CG SECOND FSSG

CG II MAF

HQ NUC II MAF

NAVHOSP CAMP LEJEUNE NC

NAVDENCLINIC CAMP LEJEUNE NC

MCB CAMP LEJEUNE NC

INFO MCAS NEW RIVER NC

UNCLAS //N06280//

SUBJ: HAZARDOUS MATERIAL DISPOSAL PROGRAM

A. BO 6240.5

B. ON-SITE HAZARDOUS WASTE (HW) INSPECTION BY EPA AND STATE DHS OF 26 JUN 86

1. REF (A) PROMULGATES THE RESPONSIBILITIES, PROCEDURES AND GUIDELINES FOR HAZARDOUS MATERIAL (HM) AND HW HANDLING, LABELING, PACKAGING, STORAGE AND TRANSPORTATION. COMPREHENSIVE FEDERAL LEGISLATION HAS PLACED STRINGENT LEGAL REQUIREMENTS ON THE MANAGEMENT OF

DISTR:
|NREA|BFAC|GSTF|SSTF|OCDR|CEOB|BSDO|BCOS|

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

J. I. WOOTEN, NREA, GS-12, 5003

SPECIAL INSTRUCTIONS

SJA ——— FAC ———

RELEASER

TYPED NAME, TITLE, OFFICE SYMBOL AND PHONE: T. J. DALZELL, AC/S FAC, 3034

SIGNATURE

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE TIME GROUP

DD FORM 1 MAR 79 173/2 (OCR) PREVIOUS EDITION IS OBSOLETE S/N 0102-LF-000-1735 ★ U.S. GPO 1981—336-081 E 2193:321

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

PAGE	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	CIC	ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO					
02 OF 03				RR		UUUU				2960930

BOOK

MESSAGE HANDLING INSTRUCTIONS

HM AND HW FROM CIVILIAN AND MILITARY PERSONNEL FAILING TO FOLLOW ESTABLISHED PROCEDURES MAY BE SUBJECT TO BOTH CIVIL AND CRIMINAL PENALTIES. STRICT ADHERENCE TO ESTABLISHED PROCEDURES IS NECESSARY TO AVOID IMPOSITION OF CIVIL AND/OR CRIMINAL PENALTIES.

2. THE PURPOSE OF THIS MSG IS TO ADVISE ORGANIZATIONAL PERSONNEL THAT MCB ENVIRONMENTAL PERSONNEL WILL BEGIN COMPLIANCE INSPECTIONS OF ALL WORK SITES/SHOPS WHERE HW ARE ROUTINELY GENERATED OR STORED. USED SOLVENTS, DEGREASERS, ELECTROLYTE, LITHIUM BATTERIES AND WASTE OIL WITH CERTAIN REGULATED CONTAMINANTS ARE EXAMPLES OF ROUTINELY GENERATED HW. THE SUBJ INSPECTIONS ARE BEING INITIATED IN RESPONSE TO REF {B} WHICH IDENTIFIED SERIOUS DISCREPANCIES REGARDING IMPLEMENTATION OF FEDERAL/STATE REGULATIONS OUTLINED IN REF {A}.

3. THE INSPECTIONS WILL BE CONDUCTED UNDER THE COGNIZANCE OF THE DIR, NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS {NREA}. INSPECTIONS WILL BE SCHEDULED IN COOPERATION WITH HMDCS FOR EACH MAJOR CMD. EACH INSPECTION WILL RESULT IN A WRITTEN REPT LISTING SPECIFIC VIOLATIONS OF REF {A} AND THE REGULATIONS CITED THEREIN. THE INSPECTIONS WILL BE AT THE BN/SEPARATE COMPANY {OR EQUIVALENT} LEVEL AND WILL CONSIST OF THE FOLLOWING:

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

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

PAGE	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	CIC	ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO					
03 OF 03				RR		UUUU				2960930

BOOK

MESSAGE HANDLING INSTRUCTIONS

A. AN INBRIEF FOR THE COGNIZANT S-4 AND OTHER OFFICIALS.

B. A REVIEW OF BN/COMPANY RECORDS AND EFFORTS TO ENSURE COMPLIANCE WITH REF (A).

C. AN INSPECTION OF SELECTED HW GENERATION AND STORAGE SITES.

D. AN OUTBRIEF FOR THE COGNIZANT S-4.

E. TRANSMITTAL OF A WRITTEN INSPECTION REPT LISTING DISCREPANCIES AND REQUIRED CORRECTIVE ACTION.

F. A REINSPECTION TO DETERMINE ADEQUACY OF FOLLOWUP CORRECTIVE ACTION. THE REINSPECTION WILL BE CONDUCTED APPROXIMATELY 15 DAYS AFTER THE ORIGINAL INSPECTION UNLESS OTHERWISE SPECIFIED IN THE INSPECTION REPT.

4. POC ON THIS MATTER IS MR. DANNY SHARPE, NREA, EXTS 2083/2195.

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

DD FORM 1 MAR 79 173/2 (OCR)

PREVIOUS EDITION IS OBSOLETE
S/N 0102-LF-000-1735

★ U.S. GPO 1981 336-081

E 2193:321

file PDS has copy

6240
FAC
16 OCT 1986

From: Commanding General
To: Commanding Officer, Infantry Training School, Marine Corps Base, Camp Lejeune, NC 28542

Subj: HAZARDOUS MATERIAL DISPOSAL PROGRAM

Ref: (a) BO 6240.5

Encl: (1) Supervisory Ecologist NREAD memo 6240 NREAD of 20ct86

1. The reference outlines the responsibilities and procedures for handling, transporting and disposal of hazardous material and hazardous waste. Federal legislation places stringent, legal requirements on the management of hazardous material and hazardous waste. Violation of established procedures may subject civilian and military personnel to both civil and criminal penalties.

2. The enclosure is a memorandum for the record that documents numerous violations of established procedures by personnel of your command.

3. You are requested to conduct a thorough investigation into the circumstances surrounding these violations. You are also requested to review, in depth, your procedures and guidelines for the handling, transporting and disposal of hazardous waste and hazardous material to ensure that they are in consonance with the reference. The investigation report and the report of your review of procedures and guidelines will be provided to the Commanding General (Attn: Assistant Chief of Staff, Facilities) no later than 31 October 1986.

4. Assistance concerning the subject program and the report of violations which occurred on 1 October 1986 can be obtained from the Natural Resources and Environmental Affairs Divison, Marine Corps Base. Point of contact is Mr. Danny Sharpe, extension 5503/2083.

T. J. DALZELL
Assistant Chief of Staff, Facilities
By direction of the Commanding General

Blind copy to:(w/o encl)
NREAD

16 OCT 1986

file 6240.5

OPNAV 5216/144 (REV. 6-70)
S/N 0107-LF-778-8099
DEPARTMENT OF THE NAVY

Memorandum

DATE: 22 Sep 86

FROM: Supervisory Ecologist

TO: Director NREAD

SUBJ: Telephone con with Chloe JUE, HQMC (Code LFL) of 22 Sep 86

1. Ms. Jue asked several questions for Paul Hubbell as follows:

a. What Kind of Service is DRMO providing?

my response: Satisfactory except that DRMO is inflexible due to having only one person working in H.W. Problems Arise when employee on leave, TAD, etc.

b. Are we currently burning Used Oil?

my response: No we are not. We do burn water contaminated unused fuel for fire Training.

2. Ms Jue advised that she was Surveying Marine Corps Activities for Paul Hubbell.

D Sharpe

File Jul

NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS DIVISION
COMMENTS ON USED OIL MANAGEMENT PLAN (UOMP)

1. General Comments: These comments apply to the 9 June 1986 copy of UOMP prepared by EnSafe, Inc., under contract no. #N62467-85-B-7979.

a. Until base makes a decision on which staff section will carry out the functions outlined on pages 2, 10 and 11 of the UOMP for the Used Oil Administrator (UOA), the contractor will be unable to proceed. The concept proposed in the UOMP revolves around the UOA position.

b. Natural Resources and Environmental Affairs Division, (NREAD), perceives the UOA to be a full time position regardless of where it is assigned. Direct day-to-day technically sound supervision of this program has been the major deficiency where the program is currently located, i.e. Maintenance & Repair Division, Base Maintenance Division. Proposal to transfer program to Utilities Director is based on:

Branch

(1) the technical support staff available to the Utilities Director.

(2) The direct impact on Utilities Operations, i.e., Steam generation (used oil burning) and Waste Water (Oil water separators).

(3) Ensure that various essential phases of used oil management and oil pollution abatement are grouped together relative to commercial activities review.

The draft plan does not give sufficient background to the rationale behind the UOA concept. This may cause some problems relative to proper understanding of the plan by managers not directly involved in these operations.

2. Specific Comments:

SECTION	COMMENT
Page 2, Second sentence	Unclear
Page 2, para. 4a	"battalion and separate company" vice "separate battalion and company. . ."
Page 3, para. 4b	"..by Transporter authorized by UOA.." vice ". . . by permitted transporter."
Page 3, para 4f	'Environmental Engineer" vice "Natural Resources"
Page 3, para 5	Should be revised to address present status
Page 3, para 7	Recommend "NREAD" vice "Environmental Engineer"
Page 4, para 8	Antifreeze is currently disposed of through Sanitary Sewer
Page 4, para 11	Would DRMO not be required to arrange contract?
Page 5, para 4	No conflict with change recommended for page 3, para 7
Page 7, para 1.3	Authority needs to be specifically referenced to written Marine Corps instruction
Page 7, para 1.4	Recommend attaching Appendix which provides correct definitions
Page 8, para 1.8	"Volume 1, Section 2.3.2" does not exist
Page 9, para 2.0	"Oil from storm water storage tanks and oil water separators" vice "oil from storm water separators."

Page 10, para 3.1 para 3.2.1	Unresolved issue, i.e., who is AC/S Facilities going to designate as used oil administrator. Key decision required before plan can be published.
Page 11, para 3.2.1	"Navy on-scene-commander" vice "Emergency Coordinator." Note, Fire Chief provides this coordination and notifies responsible officials.
Page 11, para 3.2.2.d	Servicing of tanks should be a routine schedule, not on call by work center (except in an emergency)
Page 11, para 3.2.3a	Recommend wording as follows: "Ensure segregation and proper containerization and identification of used oil generated at work centers within HMDO's cognizance.
Page 11, para 3.2.3b	Notify cognizant Hazardous Material Disposal Coordinator if a used oil cannot be adequately identified
Page 11, para 3.2.3d	"ensure maintenenance of" . . . vice "maintain compliance. . . "
Page 12, para 3.2.6b	Clarify meaning
Page 12, para 3.2.8	"Base Safety Officer" vice Safety Department"
Page 12, para 3.2.9b	Reassign "Rent-a-Solvent" to NREAD
Page 12, para 3.2.9b	Update antifreeze
Page 13, para 3.2.9c	What does this mean?
Page 13, para 4.1.1	Recommend adding the following after first sentence, "NREAD, HMDO and UOA must work closely together to ensure proper segregation and identification of oily wastes."

Page 17, para 6	Antifreeze writeup should be updated to show present procedure of discharge to sanitary sewer
Page 23, para 6.1 para 6.3	Needs to clarify the problems associated with not segregating the skimmings from storm water storage tanks or oil water separators.

Copy to NREAD

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
C L A S S I F I E D
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

Danny

Jill

FM CMC WASHINGTON DC

TO CGMCDEC QUANTICO VA
CG MCLB ALBANY GA
CG MCB CAMP LEJEUNE NC
MCAS BEAUFORT SC
CG MCRD ERR PARRIS ISLAND SC
CG MCAS CHERRY PT NC
MCAS NEW RIVER NC

INFO NEESA PORT HUENEME CA

UNCLAS //N05100//

CMC//CODEXLFL/
SUBJ: HAZARDOUS WASTE TRAINING

1. CLASS TITLE: HAZARDOUS WASTE MANAGERS SEMINAR (HWMS) AND HAZARDOUS WASTE FACILITY OPERATORS COURSE (HWFOS)
DATES: 16-23 OCT 86
NOMINATION DEADLINE: 29 AUG 86
LOCATION: MCAS CHERRY PT
TUITION: NONE
CLASS SIZE: 40
TARGET AUDIENCE: HWMS - PERSONNEL INVULVED IN THE MANAGEMENT OF HW PROGRAMS AND THE SUPERVISION OF HW FACILITY OPS.
HWFOC - PERSONNEL WHO PACKAGE, LABEL, HANDLE, TRANSPORT, SAMPLE, AND STORE HW.
SCOPE: HWMS - TWO DAY SEMINAR (16-17 OCT) FOCUSING ON REGULATORY AND TECHNICAL ASPECTS OF DOD AND NAVY POLICY. OVERVIEW OF HM CLASSIFICATION, IDENTIFICATION, AND INFORMATION SYSTEMS, AND SPILL PLANS. HWFOC - FOUR DAY COURSE (20-23 OCT) PROVIDES KNOWLEDGE FOR THE SAFE AND ENVIRONMENTALLY SOUND OPERATIONS OF HW FACILITIES IN ACCORDANCE WITH EPA AND NAVY GUIDELINES.

2. ACTIVITIES WISHING TO NOMINATE PERSONNEL TO ATTEND SUBJECT TRAINING SHOULD SEND THE FOLLOWING INFO TO NEESA WITH COPY TO CMC (LFL) IN FORMAT INDICATED BELOW:

NOMINEE.S NAME	SSN	CODE	JOB TITLE
Betz Elizabeth			Supervisory Chemist
Martin Manuel			Soil Conservation Technician

(HWFOC Course)

MANP(2)...ACT FOR CG MCB CAMP LEJEUNE(122) 05100/ 1/0203
BCOS(1) BPMO(1) BSOO(1) CEOA(1) CEOB(1) FMSS(1) FSMO(1) GSTF(12) OCOR(14) OICB(1) SAFD(1) SSTF(85)

RTD:000-000/COPIES:0122

187625/221 1 OF 2 MATA0052 221/02:21Z 030130Z AUG 86
CSN:AUIA00233 CMC WASHINGTON

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U U N C L A S S I F I E D U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

GRADE/RANK NAME AND DATE OF DESIRED CLASS
NAME AND PHONE NUMBER FOR LOCAL POC

3. QUESTION REGARDING COI SHOULD BE DIRECTED TO LAURA HUBER, CMC (LFL), A/V 227-1890/91 OR NEESA POCS MR. DAN TANNER OR MR. SAM HIGUCHI (112H), A/V 360-4504.

BT

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U CLASSIFIED
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

ROUTINE

R 080130Z AUG 86

FM CMC WASHINGTON DC

TO CGMCDEC QUANTICO VA
CG MCLB ALBANY GA
CG MCB CAMP LEJEUNE NC
MCAS BEAUFORT SC
CG MCRD ERR PARRIS ISLAND SC
CG MCAS CHERRY PT NC
MCAS NEW RIVER NC

INFO NEESA PORT HUENEME CA

UNCLAS //N05100//

CMC//CODEXLFL/
SUBJ: HAZARDOUS WASTE TRAINING

1. CLASS TITLE: HAZARDOUS WASTE MANAGERS SEMINAR (HWMS) AND HAZARDOUS WASTE FACILITY OPERATORS COURSE (HWFOS)
DATES: 16-23 OCT 86
NOMINATION DEADLINE: 29 AUG 86
LOCATION: MCAS CHERRY PT
TUITION: NONE
CLASS SIZE: 40
TARGET AUDIENCE: HWMS - PERSONNEL INVULVED IN THE MANAGEMENT OF HW PROGRAMS AND THE SUPERVISION OF HW FACILITY OPS. HWFOC - PERSONNEL WHO PACKAGE, LABEL, HANDLE, TRANSPORT, SAMPLE, AND STORE HW.
SCOPE: HWMS - TWO DAY SEMINAR (16-17 OCT) FOCUSING ON REGULATORY AND TECHNICAL ASPECTS OF DOD AND NAVY POLICY. OVERVIEW OF HM CLASSIFICATION, IDENTIFICATION, AND INFORMATION SYSTEMS, AND SPILL PLANS. HWFOC - FOUR DAY COURSE (20-23 OCT) PROVIDES KNOWLEDGE FOR THE SAFE AND ENVIRONMENTALLY SOUND OPERATIONS OF HW FACILITIES IN ACCORDANCE WITH EPA AND NAVY GUIDELINES.

2. ACTIVITIES WISHING TO NOMINATE PERSONNEL TO ATTEND SUBJECT TRAINING SHOULD SEND THE FOLLOWING INFO TO NEESA WITH COPY TO CMC (LFL) IN FORMAT INDICATED BELOW:

NOMINEE.S NAME	SSN	CODE	JOB TITLE
Betz Elizabeth			Supervisory Chemist
Martin Manuel			Soil Conservation Technician

(HWFOC Course)

MANP(2)...ACT FOR CG MCB CAMP LEJEUNE(122) 05100/ 1/0203
BCOS(1) BPMO(1) BSDO(1) CEOA(1) CEOB(1) FMSS(1) FSMO(1) GSTF(12) OCDR(14) OICB(1) SAFD(1) SSTF(85)

RTD:000-000/COPIES:0122

187625/221 1 OF 2 MATA0052 221/02:21Z 080130Z AUG 86
CSN:AUIA00233 CMC WASHINGTON

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

GRADE/RANK NAME AND DATE OF DESIRED CLASS
NAME AND PHONE NUMBER FOR LOCAL POC

3. QUESTION REGARDING COI SHOULD BE DIRECTED TO LAURA HUBER, CMC (LFL), A/V 227-1890/91 OR NEESA POCS MR. DAN TANNER OR MR. SAM HIGUCHI (112H), A/V 360-4504.

BT

187625/221 2 OF 2 MATA0052 221/02:21Z 080130Z AUG 86
CSN:AUIA00233 CMC WASHINGTON

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

SOLICITATION, OFFER AND AWARD

1. THIS CONTRACT IS A RATED ORDER UNDER DPAS (15 CFR 350) ▶ RATING: S-1 | PAGE OF: 1 | 75 PAGES

2. CONTRACT NO.	3. SOLICITATION NO.	4. TYPE OF SOLICITATION	5. DATE ISSUED	6. REQUISITION/PURCHASE NO.
	DLA200-86-B-0014 DLA200-86-R-0012	[X] SEALED BID (IFB) [ ] NEGOTIATED (RFP)	11 Sept. 86	JM-86-0004

7. ISSUED BY — CODE SC4400

Defense Reutilization & Marketing Service
Federal Center (DRMS-PH)
74 N. Washington Ave.
Battle Creek, MI 49017-3092

8. ADDRESS OFFER TO (If other than Item 7)

ORIGINAL

NOTE: In sealed bid solicitations "offer" and "offeror" mean "bid" and "bidder".

SOLICITATION

9. Sealed offers in original and TWO (2) copies for furnishing the supplies or services in the Schedule will be received at the place specified in Item 8, or if handcarried, in the depository located in Federal Center, BLDG. 2, Rm. 2-1-61 until 3:00 PM (Hour) local time 23 Sept 86 (Date)

CAUTION – LATE Submissions, Modifications, and Withdrawals: See Section L, Provision No. 52.214-7 or 52.215-10. All offers are subject to all terms and conditions contained in this solicitation.

10. FOR INFORMATION CALL:	A. NAME	B. TELEPHONE NO. (Include area code) (NO COLLECT CALLS)
	CONNIE MCGUIRE	(616)962-6511/x9359/9360

11. TABLE OF CONTENTS

(X)	SEC.	DESCRIPTION	PAGE(S)
		PART I – THE SCHEDULE	
X	A	SOLICITATION/CONTRACT FORM	1
X	B	SUPPLIES OR SERVICES AND PRICES/COSTS	2-13
X	C	DESCRIPTION/SPECS./WORK STATEMENT	14-22
X	D	PACKAGING AND MARKING	23
X	E	INSPECTION AND ACCEPTANCE	24-25
X	F	DELIVERIES OR PERFORMANCE	26-27
X	G	CONTRACT ADMINISTRATION DATA	28-30
X	H	SPECIAL CONTRACT REQUIREMENTS	31-37
		PART II – CONTRACT CLAUSES	
X	I	CONTRACT CLAUSES	38-52
		PART III – LIST OF DOCUMENTS, EXHIBITS AND OTHER ATTACH.	
X	J	LIST OF ATTACHMENTS	53
		PART IV – REPRESENTATIONS AND INSTRUCTIONS	
X	K	REPRESENTATIONS, CERTIFICATIONS AND OTHER STATEMENTS OF OFFERORS	54-61
X	L	INSTRS., CONDS., AND NOTICES TO OFFERORS	62-73
X	M	EVALUATION FACTORS FOR AWARD	74-75

OFFER (Must be fully completed by offeror)

NOTE: Item 12 does not apply if the solicitation includes the provisions at 52.214-16, Minimum Bid Acceptance Period.

12. In compliance with the above, the undersigned agrees, if this offer is accepted within _____ calendar days (60 calendar days unless a different period is inserted by the offeror) from the date for receipt of offers specified above, to furnish any or all items upon which prices are offered at the price set opposite each item, delivered at the designated point(s), within the time specified in the schedule.

13. DISCOUNT FOR PROMPT PAYMENT (See Section I, Clause No. 52.232-8)	10 CALENDAR DAYS %	20 CALENDAR DAYS %	30 CALENDAR DAYS %	CALENDAR DAYS %

14. ACKNOWLEDGMENT OF AMENDMENTS (The offeror acknowledges receipt of amendments to the SOLICITATION for offerors and related documents numbered and dated:	AMENDMENT NO.	DATE	AMENDMENT NO.	DATE

15A. NAME AND ADDRESS OF OFFEROR	CODE	FACILITY	16. NAME AND TITLE OF PERSON AUTHORIZED TO SIGN OFFER (Type or print)
Envirosure Management Corp. 333 Ganson St. Buffalo, NY 14203			Mr. Jack Seitz Mgr. Gov't Contracts

15B. TELEPHONE NO. (Include area code)	15C. CHECK IF REMITTANCE ADDRESS IS DIFFERENT FROM ABOVE - ENTER SUCH ADDRESS IN SCHEDULE	17. SIGNATURE	18. OFFER DATE
	[ ]		22 Sept 86

AWARD (To be completed by Government)

19. ACCEPTED AS TO ITEMS NUMBERED	20. AMOUNT	21. ACCOUNTING AND APPROPRIATION
		To be cited on individual delivery order.

22. AUTHORITY FOR USING OTHER THAN FULL AND OPEN COMPETITION:

[ ] 10 U.S.C. 2304(c)( ) [ ] 41 U.S.C. 253(c)( )

23. SUBMIT INVOICES TO ADDRESS SHOWN IN ▶ ITEM: See G.3
(4 copies unless otherwise specified)

24. ADMINISTERED BY (If other than Item 7)	CODE	25. PAYMENT WILL BE MADE BY	CODE

26. NAME OF CONTRACTING OFFICER (Type or print)	27. UNITED STATES OF AMERICA (Signature of Contracting Officer)	28. AWARD DATE

IMPORTANT – Award will be made on this Form, or on Standard Form 26, or by other authorized official written notice.

CONTINUATION SHEET	REFERENCE NO. OF DOCUMENT BEING CONTINUED: DLA200-86-B-0014 DLA200-86-R-0012	PAGE 3 OF 76 PAGES

NAME OF OFFEROR OR CONTRACTOR

ITEM NO.	SUPPLIES/SERVICES	QUANTITY	UNIT	UNIT PRICE	AMOUNT
	This is a FIRM-FIXED-PRICE REQUIREMENTS Contract for the following items:				
	The hazardous property for disposal under this contract are located at the following Federal Installations:				
	PICK UP POINTS:			POINT OF CONTACT	
	Defense Reutilization & Marketing Office: Cherry Point, Cherry Point MCAS, Havelock, NC.			Connie Beasley (919) 466-2743	
	Off-Site Branch, Goldsboro Seymour-Johnson AFB, NC			" "	
	Defense Reutilization & Marketing Office: Bragg Fort Bragg, NC			William Callihan (919) 396-5298	
	Military Ocean Terminal, Sunny Point Southport, NC 28061			" "	
	U.S. Marine Corp Reserve, 7838 McCloud Road Greensboro, NC 27409			" "	
	Off-Site Branch, Pope Pope AFB, NC			" "	
	Defense Reutilization & Marketing Office: Lejuene Camp Lejuene, NC			George Eggers (919) 451-5613	
	U.S.P. & F.O. 4201 Reedy Creek Road Raleigh, NC			Norman Hasketh (919)733-3370 ext 227	

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE — ESTIMATED ANNUAL

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	QUANTITY	UNIT	UNIT PRICE	AMOUNT
0001	85 Gallon Containers	200	EA	30.00	
0002	55 Gallon Containers	6,000	EA	No charge	
0003	30-54 Gallon Containers	1,000	EA	No charge	
0004	10-29 Gallon Containers	1,000	EA	No charge	
0005	1-9 Gallon Containers	2,500	EA	10.00	
0006	Less than 1 gallon Container	2,000	EA	no charge	
0007	Absorbent, (cont. with but not limited to, TCP, Sulfuric Acid, Varsol, Acetone, Electrolyte, JP5, Oil, Hydraulic Fluid, Thinner, Paint, Trichloroethane, Skydrol, Calibrant, Polyurethane, Lacquier, Foam, Corrosion Preventative, Tricholoethylene)	170,000	LB	0.35	
0008	Acetone	320	GL	4.50	
0009	Adhesive	1,000	GL	3.85	
0010	Adhesive	1,000	LB	0.50	
0011	Alcohols, including, but not limited to, Methanol, Ethyl Alcohol, Isopropyl, Alcohol, Amyle Alcohol	500	GL	4.50	
0012	Alkaline Permanganate	500	GL	4.50	
0013	Aluminum Powder	1,000	LB	1.00	
0014	Ammonium Hydroxide	300	GL	4.50	
0015	Ammonium Nitrate	200	GL	4.50	
0016	Anodex Cleaner	200	GL	4.50	
0017	Anti-foam Compound	200	GL	4.50	
0018	Anti-freeze	300	GL	4.50	
0019	Asbestos, Friable, various containers	100	LB	1.00	
0020	Asbestos, Non-Friable, various containers	100	LB	1.00	
0021	Batteries, Alkaline Carbonaire Contain Zinc	36,000	LB	0.44	
0022	Batteries, Flashlight	500	LB	0.44	
0023	Batteries, Lithium Sulfur Dioxide, both balanced and unbalanced	50,000	LB	3.75	

311,500.00

CONTINUATION SHEET	REFERENCE NO. OF DOCUMENT BEING CONTINUED DLA200-86-B-0014 DLA200-86-R-0012	PAGE 5 OF 75 PAGES

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0024	Batteries, Magnesium	3,000	LB	0.44	
0025	Batteries, Nickel Cadium	28,900	LB	0.44	
0026	Batteries, Mercury	5,000	LB	0.44	
0027	Batteries, Dry Cell, General Purpose	2,000	LB	0.44	
0028	Battery, Acid Used (Electrolyze)	500	GL	5.00	
0029	Calibrating Fluid	450	GL	4.50	
0030	Carbon Remover	60,000	GL	2.50	
0031	Chemical Sludges (may be contaminated with any chemical listed in this schedule)	1,000	GL	4.50	
0032	Chemical Sludges (may be contaminated with any Chemical listed in this schedule	2,000	LB	0.50	
0033	Chromic Acid	2,000	GL	4.50	
0034	Chromic Salts	2,000	LB	0.50	
0035	Cleaning Compound	4,000	GL	4.20	
0036	Cleaning Solvent, maybe cont. with water	2,600	GL	3.85	
0037	Corrosion Preventative	1,500	GL	3.85	
0038	Corrosion Remover	1,200	GL	4.20	
0039	Cutting Fluid	300	GL	4.50	
0040	Cyanide, Contaminated Filters	5,000	LB	0.50	
0041	Cyanide, Gold	100	LB	7.00	
0042	Cylinders, Compressed gas, Acetylene (various sizes)	5,290	LB	6.00	
0043	Cylinders, Nitogen	800	LB	6.00	
0044	Cans, Aerosol (Containing Misc. Chemicals)	1,500	LB	2.00	
0045	Decontaminating Agent, DS-2	600	GL	4.50	
0046	Decontaminating Agent, STB (Super Tropical Bleach)	1,200	GL	4.50	
0047	Decontaminating Kit, Skin & Refill Kits	200	GL	6.00	
0048	Desicant	1,000	GL	4.20	

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0049	Descaling Compound	1,000	GL	4.20	
0050	Dry Cleaning Solvent	600	GL	4.50	
0051	Extinguishers, Fire	8,000	LB	1.00	
0052	Ferric Chloride	10,000	LB	0.44	
0053	Finger Print Remover	200	GL	5.00	
0054	Fluorescent Penetrant	1,000	GL	4.20	
0055	Freon	200	GL	5.00	
0056	Fuel Filters	10,000	LB	0.44	
0057	Grease	1,500	LB	0.50	
0058	Heptane	1,000	GL	3.85	
0059	Hydratoque	100	GL	7.00	
0060	Hydraulic fluid, maybe cont. with water Trichlorotriflouroetnane	3,000	GL	4.00	
0061	Hydrochloric Acid	200	GL	5.00	
0062	Inspection Penetrant	110	GL	5.00	
0063	Insulating Oil	300	GL	4.50	
0064	ION Exchange Compound	500	GL	4.50	
0065	JP5, may be cont. with Oil, Mogas, MEK, Thinner	250	GL	4.00	
0066	Layout Dye	100	GL	5.00	
0067	Leather Dressing	100	GL	5.00	
0068	Leather Dressing	9,000	LB	0.44	
0069	Lube Oil, may be cont. with water, dirt or Hydraulic Fluid	800	GL	4.00	
0070	Mercury, Dirty, may be cont. with water	500	LB	6.00	
0071	Methylene Chloride	9,000	GL	4.93	
0072	Methyl Ethyl Ketone	200	GL	4.00	

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0073	Methyl Ethyl Ketone, Approx. 4% Xylene, 28% Lacquer, 14% Polyurethane, 14% enamel	5,300	GL	3.85	
0074	Monethanolamine	450	GL	4.50	
0075	Naptha, maybe cont. with water	200	GL	4.50	
0076	Nickel Strip Solution	600	GL	4.50	
0077	Nitric Acid, maybe contaminated with water or Phosphoric Acid	1,000	GL	4.50	
0078	Oil and Fuel Sludge (maybe leaded or unleaded)	1,000	GL	4.50	
0079	Oil and Fuel Sludge (maybe leaded or unleaded)	1,000	LB	0.50	
0080	Oil, maybe cont. with water, paint, Thinner or diesel fuel	1,800	GL	4.00	
0081	Oil Filters	40,000	LB	0.44	
0082	Oil, Synthetic	200	GL	5.00	
0083	Paint, including, but not limited to, plastic coating, latex, enamel, primer, polyurethane, epoxy runway, catalyst solution, lacquer, lead base	2,000	GL	4.00	
0084	Paint, including, but not limited to, plastic coating, latex enamel, primer, polyurethane, Epoxy runway, catalyst solution, lacquer, lead base	10,000	LB	0.44	
0085	Paint Cans, Aerosol	450	LB	3.00	
0086	Paint Remover	4,000	GL	4.93	
0087	Paint Residue, including but not limited to, Enamel, Latex, Lacquer, Polyurethane Residue	21,000	LB	0.44	
0088	Paint Sludge, including, but not limited to, Enamel, Latex Sludge	250	GL	4.50	
0089	Paint Sludge, including, but not limited to, Enamel, Latex Sludge	24,000	LB	0.44	
0090	Paint Solids	24,500	LB	0.44	
0091	Paint Stripper, cont. with but not limited to, 35% Paint Chips, 23% Dirt, 20% water, 8% Rocks, 8% metal, less than 1% each of the	1,300	GL	4.93	

FOR USE UNDER STEP 2 ONLY

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
	following: Chromium, copper, cadmium, zinc, nickel, lead				
0092	Paint Thinner	7,500	GL	3.85	
0093	Pesticides	150	GL	10.00	
0094	Pesticides	150	LB	5.00	
0095	Photographic Chemicals, including, but not limited to, Developer, Toner, Reversal Bleach Lithographic Etch	350	GL	4.50	
0096	Photographic Chemicals, including, but not limited to, Developer, Toner, Stablilizer	150	LB	1.00	
0097	Pit Sludge, contaminated with, but not limited to, Paint Acids, Amines, Plastic Scrap, Wood Scrap, Scrap Metal, Chlorinated Solvents, Dirt, Water, Trichloroethane, Sodium Carbonate, Potassium Permanganate, Sodium Hydroxide, Nitric Acid, Varsol, Sodium Dichromate, Sodium Glu-coheptanate Dihxdrate, Sodium Hydroxy Ethylene Diamine Triacetate, Sodium Chloride, Sodium Gluconate, Sodium Hydroxy Ethyl Ethylene Diamine Triacetate, Sodium Ethylene Diamine Tet-racetate, N-Hydroxyethyl Ethylene Diamine Triacetic Acid, Methanol, Kerosene, Cresylic Acid, Methylene Chloride, Petroleum Napatha, Sodium Dichromate, Phenols, Sodium Fluoride, Potassium Hydroxide, Potassium Gluconate, Mono Ethanolamine, Tri Ethanol Amine, Dodecyl-benzene Sul-Acid, Tall Oil	3,000	GL	4.50	
0098	Potassium Permanganate	200	GL	4.50	
0099	Propane Gas Bottles (maybe partially full)	200	LB	6.00	
0100	Roofing Petroleum	200	GL	4.50	
0101	Sealer	150	GL	5.00	
0102	Sealing Compound	750	GL	4.50	
0103	Silver Strip Solution, Cyanide	1,500	LB	0.50	
0104	Skydrol, contaminated with water	150	GL	5.00	
0105	Soap, General Purpose (used in cleaning aircraft)	500	GL	4.50	

CONTINUATION SHEET	REFERENCE NO. OF DOCUMENT BEING CONTINUED DLA200-86-B-0014 DLA200-86-R-0012	PAGE 9 OF 75 PAGES

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0106	Sodium Carbonate, (maybe contaminated with water, & Sulfuric Acid)	12,400	LB	0.44	
0107	Sodium Hydroxide	200	GL	4.50	
0108	Stripper, Waste, Cold, contaminated with but not limited to, Sodium Dichromate, Methylene Chloride, Phendlsamines dichlorobeneeze, Formic Acid & Hydroxyacetic Acid	16,000	GL	4.33	
0109	Stripper, Waste, Hot Tank, contaminated with but not limited to Methylene Chloride, Phenols, Formic Acid, Acetic Acid, Sodium Dichromate, Paint & Water.	9,000	GL	4.33	
0110	Sulfuric Acid, maybe cont, with lead & water	11,000	GL	5.00	
0111	Surface Cleaner	350	GL	5.00	
0112	Tetrachloroethylene	1,000	GL	4.93	
0113	Thinner, Used	15,000	GL	3.85	
0114	Thinner, Acetate	350	GL	4.50	
0115	Thinner, Polyurethane	100	GL	5.00	
0116	Trichloroethane, maybe cont. with wax, MEK, Water, Cleaning Solvent, Oil, Grease, Sand Dirt	4,000	GL	4.93	
0117	Trichloroethylene	1,300	GL	4.93	
0118	Trichlorotrifluoroethane (Freon) contamined with Dirt & Grease	2,700	GL	4.93	
0119	Toluene	1,000	GL	3.85	
0120	Varnish, Electrical Insulating	350	GL	4.50	
0121	Varsol, Used	800	GL	4.00	
0122	Xylene, maybe cont. with water & Ethanol	750	GL	4.00	
0123	Zyglo Emulsifier, maybe cont. with dirt	2,250	GL	4.50	
0124	Zyglo Penetrant, maybe cont. with dirt, water	500	GL	4.50	
0125 0125 AA	Halogenated solvents Waste with less than 10% halogenated solvents	5,000	GL	4.33	

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0125AB	Waste with less than 10% halogenated solvents	5,000	lb	0.75	
0125AC	Waste with more than 10% halogenated solvents	5,000	lb	0.75	
0125AD	Waste with more than 10% halogneated solvents	5,000	gl	4.93	
0126	Solvents, Non-Halogenated	5,000	gl	3.85	

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0127	Irritating Material (as defined in 49 CFR 173.381)	500	GL	5.00	
0128	Irritating Material (as defined in 49 CFR 173.381)	500	LB	1.00	
0129	ORM-A (other regulated material) (as defined in 49 CFR 173.500)	500	GL	5.00	
0130	ORM-A (other regulated material) (as defined in 49 CFR 173.500)	500	LB	1.00	
0131	ORM-D (other rugulated material) (as defined in 49 CFR 173.500)	500	GL	5.00	
0132	ORM-D (other regulated material) (as defined in 49 CFR 173.500)	500	LB	1.00	
0133	Poison B (as defined in 49 CFR 173.343)	500	GL	6.00	
0134	Poison B (as defined in 49 CFR 173.343)	500	LB	1.00	
0135	Spill Residue, Mercury, including, but not limited to, Gloves, Paper, Dirt Rags	500	LB	1.00	
0136	Spill Residue, Chromic Acid, including, but not limited to, Sludge, Plastic, Soda, Dirt, Wood, Lead, Metal, Steel, Fiberglass	74,000	LB	0.35	
0137	Spill Residue, JP5, including, but not limited to, Soil, Absorbant, Speed-i-dry Booms, Pads, Rags	110,000	LB	0.35	
0138	Spill Residue, Oil, including, but not limited to, Gas, Fuel, JP5, Hydralic Fluid, Pol, Grease, rags, Dirt, Absorbent, Booms pads, speedy dry	30,000	LB	0.35	
0139	Spill Residue, Miscellaneous contaminated materials, such as protective clothing, cleanup items, absorbent and soil (maybe contaminated with any of the chemical groups listed in this schedule)	20,000	LB	0.35	
0140	Pallets, contaminated (maybe contaminated with any material listed in this schedule)	20	EA	10.00	
0141	Contaminated containers, empty (may contain up to one (1) inch of any material listed in this schedule) (55 to 85 gallon Drums)	5,000	LB	0.50	

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE ESTIMATED ANNUAL

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	QUANTITY	UNIT	UNIT PRICE	AMOUNT
0142	Contaminated containers, empty (may contain up to one (1) inch of any material listed in this schedule)(various size containers less than 55 gallon drum).	2,500	LB	1.00	
0143	Oil (may be contaminated with but not limited to anything listed in bidding schedule plus water, thinner, fuels, paint, MEK, hydraulic fluid, heavy metal and degreaser)(contained in 16 tanks of various sizes located at Lejeune) Underground tanks 1. 15,000 gl 2. 15,000 gl Above ground tanks 3. 30,000 gl 4. 30,000 gl 5. 30,000 gl 6. 17,500 gl 7. 17,500 gl 8. 17,500 gl 9. 30,000 gl 10. 273,000 gl 11. 12,500 gl 12. 12,500 gl 13. 12,500 gl 14. 12,500 gl 15. 12,500 gl 16. 12,500 gl	550,500	GL	0.71	
0143A	Water Purification Tablets	200	LB	1.00	

AWARD/CONTRACT "J"

1. THIS CONTRACT IS A RATED ORDER UNDER DPAS (15 CFR 350)	RATING	PAGE OF PAGES
	S-1	1 | 1

2. CONTRACT (Proc. Inst. Ident.) NO.	3. EFFECTIVE DATE	4. REQUISITION/PURCHASE REQUEST/PROJECT NO.
DLA200-87-D-0002	See Block 20c	JM-86-0004

5. ISSUED BY CODE SC4400
Defense Reutilization & Marketing Service
Federal Center (DRMS-PH)
74 North Washington Avenue
Battle Creek, MI 49017-3092

6. ADMINISTERED BY *(If other than Item 5)* CODE SC4400
Defense Reutilization & Marketing Service
ATTN: DRMS-P-M
2163 Airways Blvd., Bldg. 210
Memphis, TN 38114

7. NAME AND ADDRESS OF CONTRACTOR *(No., street, city, county, State and ZIP Code)*
Envirosure Management Corp.
333 Ganson Street
Buffalo, NY 14203

8. DELIVERY
☐ FOB ORIGIN ☒ OTHER *(See below)*

9. DISCOUNT FOR PROMPT PAYMENT
Net 30

10. SUBMIT INVOICES *(4 copies unless otherwise specified)* TO THE ADDRESS SHOWN IN: ITEM See block 6

CODE FACILITY CODE

11. SHIP TO/MARK FOR CODE
See Contract Terms

12. PAYMENT WILL BE MADE BY CODE SC4400
Defense Reutilization & Marketing Service
74 North Washington Ave., ATTN: DRMS-CFE
Battle Creek, MI 49017-3092

13. AUTHORITY FOR USING OTHER THAN FULL AND OPEN COMPETITION:
☐ 10 U.S.C. 2304(c)( ) ☐ 41 U.S.C. 253(c)( )

14. ACCOUNTING AND APPROPRIATION DATA
To be cited on each individual delivery order.

15A. ITEM NO.	15B. SUPPLIES/SERVICES	15C. QUANTITY	15D. UNIT	15E. UNIT PRICE	15F. AMOUNT
	This award document incorporates IFB solicitation, including the approved items 0001 through 0156.	DLA200-86-B-0014 and technical proposal.	your bid on	Accepted as to	that ESTIMATED

15G. TOTAL AMOUNT OF CONTRACT ▶ $2,097,071.00

16. TABLE OF CONTENTS

(X)	SEC.	DESCRIPTION	PAGE(S)	(X)	SEC	DESCRIPTION	PAGE(S)
		PART I — THE SCHEDULE				PART II — CONTRACT CLAUSES	
X	A	SOLICITATION/CONTRACT FORM	1	X	I	CONTRACT CLAUSES	38-52
X	B	SUPPLIES OR SERVICES AND PRICES/COSTS	2-13			PART III — LIST OF DOCUMENTS, EXHIBITS AND OTHER ATTACH.	
X	C	DESCRIPTION/SPECS./WORK STATEMENT	14-22	X	J	LIST OF ATTACHMENTS	53
X	D	PACKAGING AND MARKING	23			PART IV — REPRESENTATIONS AND INSTRUCTIONS	
X	E	INSPECTION AND ACCEPTANCE	24-25		K	REPRESENTATIONS, CERTIFICATIONS AND OTHER STATEMENTS OF OFFERORS	
X	F	DELIVERIES OR PERFORMANCE	26-27		L	INSTRS., CONDS., AND NOTICES TO OFFERORS	
X	G	CONTRACT ADMINISTRATION DATA	28-30		M	EVALUATION FACTORS FOR AWARD	
X	H	SPECIAL CONTRACT REQUIREMENTS	31-37				

CONTRACTING OFFICER WILL COMPLETE ITEM 17 OR 18 AS APPLICABLE

17. ☐ CONTRACTOR'S NEGOTIATED AGREEMENT *(Contractor is required to sign this document and return _____ copies to issuing office.)* Contractor agrees to furnish and deliver all items or perform all the services set forth or otherwise identified above and on any continuation sheets for the consideration stated herein. The rights and obligations of the parties to this contract shall be subject to and governed by the following documents: (a) this award/contract, (b) the solicitation, if any, and (c) such provisions, representations, certifications, and specifications, as are attached or incorporated by reference herein. *(Attachments are listed herein.)*

18. ☐ AWARD *(Contractor is not required to sign this document.)* Your offer on Solicitation Number DLA200-86-B-0014 including the additions or changes made by you which additions or changes are set forth in full above, is hereby accepted as to the items listed above and on any continuation sheets. This award consummates the contract which consists of the following documents: (a) the Government's solicitation and your offer, and (b) this award/contract. No further contractual document is necessary.

19A. NAME AND TITLE OF SIGNER *(Type or print)*
John P Seitz
Manager Government Contracts

20A. NAME OF CONTRACTING OFFICER
RONALD W. WAGNER

19B. NAME OF CONTRACTOR
BY John P Seitz *(Signature of person authorized to sign)*

19C. DATE SIGNED 10-7-86

20B. UNITED STATES OF AMERICA
BY Ronald W. Wagner *(Signature of Contracting Officer)*

20C. DATE SIGNED 8 OCT 86

CONTINUATION SHEET	REFERENCE NO. OF DOCUMENT BEING CONTINUED DLA200-86-B-0014 DLA200-86-R-0012	PAGE 13 OF 75 PAGES

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE — MAXIMUM

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	QUANTITY	UNIT	UNIT PRICE	AMOUNT
0144	Miscellaneous Chemicals, Oxidizers (as defined in DOT Regulations 49 CFR 173.151)	2,000	GL	4.50	
0145	Miscellaneous Chemicals, Oxiders (as defined in DOT Regulations 49 CFR 173.151)	2,500	LB	0.50	
0146	Miscellaneous Chemicals, Combustible (as defined in DOT Regulations 49 CFR 173.115)	14,000	GL	4.00	
0147	Miscellaneous Chemicals, Combustible (as defined in DOT Regulations 49 CFR 173.115)	18,500	LB	0.44	
0148	Miscellaneous Chemicals, Flammable (as defined in DOT Regulations 49 CFR 173.115)	15,000	GL	3.85	
0149	Miscellaneous Chemicals, Ignitable (as defined in DOT Regulations 49 CFR 173.115)	19,500	LB	0.44	
0150	Miscellaneous Chemicals, Corrosive (as defined in EPA Regulations 40 CFR 261.22)	8,000	GL	4.20	
0151	Miscellaneous Chemicals, Corrosive (as defined in EPA Regulations 40 CFR 261.22)	10,500	LB	0.44	
0152	Miscellaneous Chemicals, Reactive (as defined in EPA Regulations 40 CFR 261.23)	1,000	GL	10.00	
0153	Miscellaneous Chemicals, Reactive (as defined in EPA Regulations 40 CFR 261.23)	1,500	LB	6.00	
0154	Miscellaneous Chemicals, Toxic (as defined in EPA Regulation 40 CFR 261.24) Non-PCB	8,000	GL	4.00	
0155	Miscellaneous Chemicals, Toxic (as defined in EPA Regulation 40 CFR 261.24) Non-PCB	10,500	LB	0.50	
0156	Blast Residue (may be contaminated with but not limited to heavy metal and sand)	300,000	lb	0.35	

6240
NREAD
14 Oct 86

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

Subj: INSPECTION REPORT ON LONG TERM HAZARDOUS WASTE STORAGE FACILITIES AT BUILDINGS TP-451 and TP-463

Ref: (a) Onsite inspection by Mr. S. Gwynn, NREAD, and Mr. Eggers, DRMO, on 14 Oct 86
(b) CG MCB ltr FAC/REA/bf 6280 of 15 Jul 83

Encl: (1) Inspection Checklist for Long Term Hazardous Waste Storage Facilities at Buildings TP-451 and TP-463

1. The enclosure provides results of reference (a) as required by refernce (b). No discrepancies were noted. Point of Contact is Mr. Sammy Gwynn, NREAD, extension 5003/2195.

J. I. WOOTEN
By direction

Copy to:
AC/S FAC
SFIRECHIEF
SJA
SNO
SSAFETYMGR

INSPECTION CHECKLIST FOR LONG TERM HAZARDOUS WASTE/MATERIALS STORAGE FACILITIES AT TP-451/TC/463

PARTICIPANTS Gwynn, Becker, Martin, Eggars DATE: 14 Oct 1986

FACILITIES AND EQUIPMENT	SAT	UNSAT	COMMENTS
1. FACILITY GROUNDS	X		
2. FACILITY SECURITY (LOCKS, DOORS, SIGNS, ETC.)	X		
3. EMERGENCY TELEPHONE AND FIRE ALARMS	X		
4. UNLOADING PAD DRAIN VALVE	X		
5. EXHAUST FANS	X		
6. INTERIOR LIGHTING AND ELECTRICAL OUTLETS	X		
7. SAFETY SHOWERS/ EYE LAVAGES	X		
8. CURBS, GRATES, OTHER FIXTURES	X		
9. NON-SPARKING SHOVELS (2)	X		
10. ABSORBENT (EQUIVALENT OF FOUR 55-GAL BARRELS)	X		
11. HAZ MAT PUMPS OR EQUIVALENT	X		
12. FIRE EXTINGUISHERS	X		
13. PROTECTIVE GEAR AND EQUIPMENT	X		
14. EMPTY CONTAINERS AND OVERPACK DRUMS	X		

File Hg Wst.-

SOLICITATION, OFFER AND AWARD

1. THIS CONTRACT IS A RATED ORDER UNDER DPAS (15 CFR 350) ▶ RATING: S-1 | PAGE OF: 1 | 75 PAGES

2. CONTRACT NO.	3. SOLICITATION NO.	4. TYPE OF SOLICITATION	5. DATE ISSUED	6. REQUISITION/PURCHASE NO.
	DLA200-86-B-0014 DLA200-86-R-0012	[X] SEALED BID (IFB) [ ] NEGOTIATED (RFP)	11 Sept. 86	JM-86-0004

7. ISSUED BY — CODE SC4400

Defense Reutilization & Marketing Service
Federal Center (DRMS-PH)
74 N. Washington Ave.
Battle Creek, MI 49017-3092

8. ADDRESS OFFER TO (If other than Item 7)

ORIGINAL

NOTE: In sealed bid solicitations "offer" and "offeror" mean "bid" and "bidder".

SOLICITATION

9. Sealed offers in original and TWO (2) copies for furnishing the supplies or services in the Schedule will be received at the place specified in Item 8, or if handcarried, in the depository located in Federal Center, BLDG. 2, Rm. 2-1-61 until 3:00 PM (Hour) local time 23 Sept 86 (Date)

CAUTION — LATE Submissions, Modifications, and Withdrawals: See Section L, Provision No. 52.214-7 or 52.215-10. All offers are subject to all terms and conditions contained in this solicitation.

10. FOR INFORMATION CALL:	A. NAME	B. TELEPHONE NO. (Include area code) (NO COLLECT CALLS)
	CONNIE MCGUIRE	(616) 962-6511/x9359/9360

11. TABLE OF CONTENTS

(X)	SEC.	DESCRIPTION	PAGE(S)	(X)	SEC.	DESCRIPTION	PAGE(S)
		PART I — THE SCHEDULE				PART II — CONTRACT CLAUSES	
X	A	SOLICITATION/CONTRACT FORM	1	X	I	CONTRACT CLAUSES	38-52
X	B	SUPPLIES OR SERVICES AND PRICES/COSTS	2-13			PART III — LIST OF DOCUMENTS, EXHIBITS AND OTHER ATTACH.	
X	C	DESCRIPTION/SPECS./WORK STATEMENT	14-22	X	J	LIST OF ATTACHMENTS	53
X	D	PACKAGING AND MARKING	23			PART IV — REPRESENTATIONS AND INSTRUCTIONS	
X	E	INSPECTION AND ACCEPTANCE	24-25				
X	F	DELIVERIES OR PERFORMANCE	26-27	X	K	REPRESENTATIONS, CERTIFICATIONS AND OTHER STATEMENTS OF OFFERORS	54-61
X	G	CONTRACT ADMINISTRATION DATA	28-30	X	L	INSTRS., CONDS., AND NOTICES TO OFFERORS	62-73
X	H	SPECIAL CONTRACT REQUIREMENTS	31-37	X	M	EVALUATION FACTORS FOR AWARD	74-75

X

OFFER (Must be fully completed by offeror)

NOTE: Item 12 does not apply if the solicitation includes the provisions at 52.214-16, Minimum Bid Acceptance Period.

12. In compliance with the above, the undersigned agrees, if this offer is accepted within _____ calendar days (60 calendar days unless a different period is inserted by the offeror) from the date for receipt of offers specified above, to furnish any or all items upon which prices are offered at the price set opposite each item, delivered at the designated point(s), within the time specified in the schedule.

13. DISCOUNT FOR PROMPT PAYMENT (See Section I, Clause No. 52.232-8) ▶	10 CALENDAR DAYS %	20 CALENDAR DAYS %	30 CALENDAR DAYS %	CALENDAR DAYS %

14. ACKNOWLEDGMENT OF AMENDMENTS (The offeror acknowledges receipt of amendments to the SOLICITATION for offerors and related documents numbered and dated:	AMENDMENT NO.	DATE	AMENDMENT NO.	DATE

15A. NAME AND ADDRESS OF OFFEROR	CODE	FACILITY	16. NAME AND TITLE OF PERSON AUTHORIZED TO SIGN OFFER (Type or print)
Envirosure Management Corp. 333 Ganson St. Buffalo, NY 14203			Mr. Jack Seitz Mgr. Govt. Contracts

15B. TELEPHONE NO. (Include area code)	15C. CHECK IF REMITTANCE ADDRESS IS DIFFERENT FROM ABOVE - ENTER SUCH ADDRESS IN SCHEDULE	17. SIGNATURE	18. OFFER DATE
	[ ]		22 Sept 86

AWARD (To be completed by Government)

19. ACCEPTED AS TO ITEMS NUMBERED	20. AMOUNT	21. ACCOUNTING AND APPROPRIATION
		To be cited on individual delivery order.

22. AUTHORITY FOR USING OTHER THAN FULL AND OPEN COMPETITION:

[ ] 10 U.S.C. 2304(c)( ) [ ] 41 U.S.C. 253(c)( )

23. SUBMIT INVOICES TO ADDRESS SHOWN IN ▶ (4 copies unless otherwise specified) ITEM: See G.3

24. ADMINISTERED BY (If other than Item 7) CODE	25. PAYMENT WILL BE MADE BY CODE

26. NAME OF CONTRACTING OFFICER (Type or print)	27. UNITED STATES OF AMERICA (Signature of Contracting Officer)	28. AWARD DATE

IMPORTANT — Award will be made on this Form, or on Standard Form 26, or by other authorized official written notice.

ITEM NO.	SUPPLIES/SERVICES	QUANTITY	UNIT	UNIT PRICE	AMOUNT
	This is a FIRM-FIXED-PRICE REQUIREMENTS Contract for the following items: The hazardous property for disposal under this contract are located at the following Federal Installations:				
	PICK UP POINTS:			POINT OF CONTACT	
	Defense Reutilization & Marketing Office: Cherry Point, Cherry Point MCAS, Havelock, NC.			Connie Beasley (919) 466-2743	
	Off-Site Branch, Goldsboro Seymour-Johnson AFB, NC			" "	
	Defense Reutilization & Marketing Office: Bragg Fort Bragg, NC			William Callihan (919) 396-5298	
	Military Ocean Terminal, Sunny Point Southport, NC 28061			" "	
	U.S. Marine Corp Reserve, 7838 McCloud Road Greensboro, NC 27409			" "	
	Off-Site Branch, Pope Pope AFB, NC			" "	
	Defense Reutilization & Marketing Office: Lejuene Camp Lejuene, NC			George Eggers (919) 451-5613	
	U.S.P. & F.O. 4201 Reedy Creek Road Raleigh, NC			Norman Hasketh (919)733-3370 ext 227	

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0001	85 Gallon Containers	200	EA	30.00	
0002	55 Gallon Containers	6,000	EA	No charge	
0003	30-54 Gallon Containers	1,000	EA	No charge	
0004	10-29 Gallon Containers	1,000	EA	No charge	
0005	1-9 Gallon Containers	2,500	EA	10.00	
0006	Less than 1 gallon Container	2,000	EA	no charge	
0007	Absorbent, (cont. with but not limited to, TCP, Sulfuric Acid, Varsol, Acetone, Electrolyte, JP5, Oil, Hydraulic Fluid, Thinner, Paint, Trichloroethane, Skydrol, Calibrant, Polyurethane, Lacquier, Foam, Corrosion Preventative, Tricholoethylene)	170,000	LB	0.35	
0008	Acetone	320	GL	4.50	
0009	Adhesive	1,000	GL	3.85	
0010	Adhesive	1,000	LB	0.50	
0011	Alcohols, including, but not limited to, Methanol, Ethyl Alcohol, Isopropyl, Alcohol, Amyle Alcohol	500	GL	4.50	
0012	Alkaline Permanganate	500	GL	4.50	
0013	Aluminum Powder	1,000	LB	1.00	
0014	Ammonium Hydroxide	300	GL	4.50	
0015	Ammonium Nitrate	200	GL	4.50	
0016	Anodex Cleaner	200	GL	4.50	
0017	Anti-foam Compound	200	GL	4.50	
0018	Anti-freeze	300	GL	4.50	
0019	Asbestos, Friable, various containers	100	LB	1.00	
0020	Asbestos, Non-Friable, various containers	100	LB	1.00	
0021	Batteries, Alkaline Carbonaire Contain Zinc	36,000	LB	0.44	
0022	Batteries, Flashlight	500	LB	0.44	
0023	Batteries, Lithium Sulfur Dioxide, both balanced and unbalanced	50,000	LB	3.75	

CONTINUATION SHEET	REFERENCE NO. OF DOCUMENT BEING CONTINUED DLA200-86-B-0014 DLA200-86-R-0012	PAGE 5 OF 75 PAGES

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0024	Batteries, Magnesium	3,000	LB	0.44	
0025	Batteries, Nickel Cadium	28,900	LB	0.44	
0026	Batteries, Mercury	5,000	LB	0.44	
0027	Batteries, Dry Cell, General Purpose	2,000	LB	0.44	
0028	Battery, Acid Used (Electrolyze)	500	GL	5.00	
0029	Calibrating Fluid	450	GL	4.50	
0030	Carbon Remover	60,000	GL	2.50	
0031	Chemical Sludges (may be contaminated with any chemical listed in this schedule)	1,000	GL	4.50	
0032	Chemical Sludges (may be contaminated with any Chemical listed in this schedule	2,000	LB	0.50	
0033	Chromic Acid	2,000	GL	4.50	
0034	Chromic Salts	2,000	LB	0.50	
0035	Cleaning Compound	4,000	GL	4.20	
0036	Cleaning Solvent, maybe cont. with water	2,600	GL	3.85	
0037	Corrosion Preventative	1,500	GL	3.85	
0038	Corrosion Remover	1,200	GL	4.20	
0039	Cutting Fluid	300	GL	4.50	
0040	Cyanide, Contaminated Filters	5,000	LB	0.50	
0041	Cyanide, Gold	100	LB	7.00	
0042	Cylinders, Compressed gas, Acetylene (various sizes)	5,290	LB	6.00	
0043	Cylinders, Nitogen	800	LB	6.00	
0044	Cans, Aerosol (Containing Misc. Chemicals)	1,500	LB	2.00	
0045	Decontaminating Agent, DS-2	600	GL	4.50	
0046	Decontaminating Agent, STB (Super Tropical Bleach)	1,200	GL	4.50	
0047	Decontaminating Kit, Skin & Refill Kits	200	GL	6.00	
0048	Desicant	1,000	GL	4.20	

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0049	Descaling Compound	1,000	GL	4.20	
0050	Dry Cleaning Solvent	600	GL	4.50	
0051	Extinguishers, Fire	8,000	LB	1.00	
0052	Ferric Chloride	10,000	LB	0.44	
0053	Finger Print Remover	200	GL	5.00	
0054	Fluorescent Penetrant	1,000	GL	4.20	
0055	Freon	200	GL	5.00	
0056	Fuel Filters	10,000	LB	0.44	
0057	Grease	1,500	LB	0.50	
0058	Heptane	1,000	GL	3.85	
0059	Hydratoque	100	GL	7.00	
0060	Hydraulic fluid, maybe cont. with water Trichlorotriflouroetnane	3,000	GL	4.00	
0061	Hydrochloric Acid	200	GL	5.00	
0062	Inspection Penetrant	110	GL	5.00	
0063	Insulating Oil	300	GL	4.50	
0064	ION Exchange Compound	500	GL	4.50	
0065	JP5, may be cont. with Oil, Mogas, MEK, Thinner	250	GL	4.00	
0066	Layout Dye	100	GL	5.00	
0067	Leather Dressing	100	GL	5.00	
0068	Leather Dressing	9,000	LB	0.44	
0069	Lube Oil, may be cont. with water, dirt or Hydraulic Fluid	800	GL	4.00	
0070	Mercury, Dirty, may be cont. with water	500	LB	6.00	
0071	Methylene Chloride	9,000	GL	4.93	
0072	Methyl Ethyl Ketone	200	GL	4.00	

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0073	Methyl Ethyl Ketone, Approx. 4% Xylene, 28% Lacquer, 14% Polyurethane, 14% enamel	5,300	GL	3.85	
0074	Monethanolamine	450	GL	4.50	
0075	Naptha, maybe cont. with water	200	GL	4.50	
0076	Nickel Strip Solution	600	GL	4.50	
0077	Nitric Acid, maybe contaminated with water or Phosphoric Acid	1,000	GL	4.50	
0078	Oil and Fuel Sludge (maybe leaded or unleaded)	1,000	GL	4.50	
0079	Oil and Fuel Sludge (maybe leaded or unleaded)	1,000	LB	0.50	
0080	Oil, maybe cont. with water, paint, Thinner or diesel fuel	1,800	GL	4.00	
0081	Oil Filters	40,000	LB	0.44	
0082	Oil, Synthetic	200	GL	5.00	
0083	Paint, including, but not limited to, plastic coating, latex, enamel, primer, polyurethane, epoxy runway, catalyst solution, lacquer, lead base	2,000	GL	4.00	
0084	Paint, including, but not limited to, plastic coating, latex enamel, primer, polyurethane, Epoxy runway, catalyst solution, lacquer, lead base	10,000	LB	0.44	
0085	Paint Cans, Aerosol	450	LB	3.00	
0086	Paint Remover	4,000	GL	4.93	
0087	Paint Residue, including but not limited to, Enamel, Latex, Lacquer, Polyurethane Residue	21,000	LB	0.44	
0088	Paint Sludge, including, but not limited to, Enamel, Latex Sludge	250	GL	4.50	
0089	Paint Sludge, including, but not limited to, Enamel, Latex Sludge	24,000	LB	0.44	
0090	Paint Solids	24,500	LB	0.44	
0091	Paint Stripper, cont. with but not limited to, 35% Paint Chips, 23% Dirt, 20% water, 8% Rocks, 8% metal, less than 1% each of the	1,300	GL	4.93	

FOR USE UNDER STEP 2 ONLY

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
	following: Chromium, copper, cadmium, zinc, nickel, lead				
0092	Paint Thinner	7,500	GL	3.85	
0093	Pesticides	150	GL	10.00	
0094	Pesticides	150	LB	5.00	
0095	Photographic Chemicals, including, but not limited to, Developer, Toner, Reversal Bleach Lithographic Etch	350	GL	4.50	
0096	Photographic Chemicals, including, but not limited to, Developer, Toner, Stablilizer	150	LB	1.00	
0097	Pit Sludge, contaminated with, but not limited to, Paint Acids, Amines, Plastic Scrap, Wood Scrap, Scrap Metal, Chlorinated Solvents, Dirt, Water, Trichloroethane, Sodium Carbonate, Potassium Permanganate, Sodium Hydroxide, Nitric Acid, Varsol, Sodium Dichromate, Sodium Glu-coheptanate Dihxdrate, Sodium Hydroxy Ethylene Diamine Triacetate, Sodium Chloride, Sodium Gluconate, Sodium Hydroxy Ethyl Ethylene Diamine Triacetate, Sodium Ethylene Diamine Tetracetate, N-Hydroxyethyl Ethylene Diamine Triacetic Acid, Methanol, Kerosene, Cresylic Acid, Methylene Chloride, Petroleum Napatha, Sodium Dichromate, Phenols, Sodium Fluoride, Potassium Hydroxide, Potassium Gluconate, Mono Ethanolamine, Tri Ethanol Amine, Dodecyl-benzene Sul-Acid, Tall Oil	3,000	GL	4.50	
0098	Potassium Permanganate	200	GL	4.50	
0099	Propane Gas Bottles (maybe partially full)	200	LB	6.00	
0100	Roofing Petroleum	200	GL	4.50	
0101	Sealer	150	GL	5.00	
0102	Sealing Compound	750	GL	4.50	
0103	Silver Strip Solution, Cyanide	1,500	LB	0.50	
0104	Skydrol, contaminated with water	150	GL	5.00	
0105	Soap, General Purpose (used in cleaning aircraft)	500	GL	4.50	

CONTINUATION SHEET	REFERENCE NO. OF DOCUMENT BEING CONTINUED DLA200-86-B-0014 DLA200-86-R-0012	PAGE 9 OF 75 PAGES

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0106	Sodium Carbonate, (maybe contaminated with water, & Sulfuric Acid)	12,400	LB	0.44	
0107	Sodium Hydroxide	200	GL	4.50	
0108	Stripper, Waste, Cold, contaminated with but not limited to, Sodium Dichromate, Methylene Chloride, Phendlsamines dichlorobeneeze, Formic Acid & Hydroxyacetic Acid	16,000	GL	4.33	
0109	Stripper, Waste, Hot Tank, contaminated with but not limited to Methylene Chloride, Phenols, Formic Acid, Acetic Acid, Sodium Dichromate, Paint & Water.	9,000	GL	4.33	
0110	Sulfuric Acid, maybe cont, with lead & water	11,000	GL	5.00	
0111	Surface Cleaner	350	GL	5.00	
0112	Tetrachloroethylene	1,000	GL	4.93	
0113	Thinner, Used	15,000	GL	3.85	
0114	Thinner, Acetate	350	GL	4.50	
0115	Thinner, Polyurethane	100	GL	5.00	
0116	Trichloroethane, maybe cont. with wax, MEK, Water, Cleaning Solvent, Oil, Grease, Sand Dirt	4,000	GL	4.93	
0117	Trichloroethylene	1,300	GL	4.93	
0118	Trichlorotrifluoroethane (Freon) contamined with Dirt & Grease	2,700	GL	4.93	
0119	Toluene	1,000	GL	3.85	
0120	Varnish, Electrical Insulating	350	GL	4.50	
0121	Varsol, Used	800	GL	4.00	
0122	Xylene, maybe cont. with water & Ethanol	750	GL	4.00	
0123	Zyglo Emulsifier, maybe cont. with dirt	2,250	GL	4.50	
0124	Zyglo Penetrant, maybe cont. with dirt, water	500	GL	4.50	
0125 0125 AA	Halogenated solvents Waste with less than 10% halogenated solvents	5,000	GL	4.33	

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0125AB	Waste with less than 10% halogenated solvents	5,000	lb	0.75	
0125AC	Waste with more than 10% halogenated solvents	5,000	lb	0.75	
0125AD	Waste-with more than 10% halogneated solvents	5,000	gl	4.93	
0126	Solvents, Non-Halogenated	5,000	gl	3.85	

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	ESTIMATED ANNUAL QUANTITY	UNIT	UNIT PRICE	AMOUNT
0127	Irritating Material (as defined in 49 CFR 173.381)	500	GL	5.00	
0128	Irritating Material (as defined in 49 CFR 173.381)	500	LB	1.00	
0129	ORM-A (other regulated material) (as defined in 49 CFR 173.500)	500	GL	5.00	
0130	ORM-A (other regulated material) (as defined in 49 CFR 173.500)	500	LB	1.00	
0131	ORM-D (other rugulated material) (as defined in 49 CFR 173.500)	500	GL	5.00	
0132	ORM-D (other regulated material) (as defined in 49 CFR 173.500)	500	LB	1.00	
0133	Poison B (as defined in 49 CFR 173.343)	500	GL	6.00	
0134	Poison B (as defined in 49 CFR 173.343)	500	LB	1.00	
0135	Spill Residue, Mercury, including, but not limited to, Gloves, Paper, Dirt Rags	500	LB	1.00	
0136	Spill Residue, Chromic Acid, including, but not limited to, Sludge, Plastic, Soda, Dirt, Wood, Lead, Metal, Steel, Fiberglass	74,000	LB	0.35	
0137	Spill Residue, JP5, including, but not limited to, Soil, Absorbant, Speed-i-dry Booms, Pads, Rags	110,000	LB	0.35	
0138	Spill Residue, Oil, including, but not limited to, Gas, Fuel, JP5, Hydralic Fluid, Pol, Grease, rags, Dirt, Absorbent, Booms pads, speedy dry	30,000	LB	0.35	
0139	Spill Residue, Miscellaneous contaminated materials, such as protective clothing, cleanup items, absorbent and soil (maybe contaminated with any of the chemical groups listed in this schedule)	20,000	LB	0.35	
0140	Pallets, contaminated (maybe contaminated with any material listed in this schedule)	20	EA	10.00	
0141	Contaminated containers, empty (may contain up to one (1) inch of any material listed in this schedule) (55 to 85 gallon Drums)	5,000	LB	0.50	

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE ESTIMATED ANNUAL

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	QUANTITY	UNIT	UNIT PRICE	AMOUNT
0142	Contaminated containers, empty (may contain up to one (1) inch of any material listed in this schedule)(various size containers less than 55 gallon drum).	2,500	LB	1.00	
0143	Oil (may be contaminated with but not limited to anything listed in bidding schedule plus water, thinner, fuels, paint, MEK, hydraulic fluid, heavy metal and degreaser)(contained in 16 tanks of various sizes located at Lejeune) Underground tanks 1. 15,000 gl 2. 15,000 gl Above ground tanks 3. 30,000 gl 4. 30,000 gl 5. 30,000 gl 6. 17,500 gl 7. 17,500 gl 8. 17,500 gl 9. 30,000 gl 10. 273,000 gl 11. 12,500 gl 12. 12,500 gl 13. 12,500 gl 14. 12,500 gl 15. 12,500 gl 16. 12,500 gl	550,500	GL	0.71	
0143A	Water Purification Tablets	200	LB	1.00	

AWARD/CONTRACT "J"

1. THIS CONTRACT IS A RATED ORDER UNDER DPAS (15 CFR 350)	RATING	PAGE OF PAGES
	S-1	1 | 1

2. CONTRACT (Proc. Inst. Ident.) NO.	3. EFFECTIVE DATE	4. REQUISITION/PURCHASE REQUEST/PROJECT NO.
DLA200-87-D-0002	See Block 20c	JM-86-0004

5. ISSUED BY CODE SC4400
Defense Reutilization & Marketing Service
Federal Center (DRMS-PH)
74 North Washington Avenue
Battle Creek, MI 49017-3092

6. ADMINISTERED BY (If other than Item 5) CODE SC4400
Defense Reutilization & Marketing Service
ATTN: DRMS-P-M
2163 Airways Blvd., Bldg. 210
Memphis, TN 38114

7. NAME AND ADDRESS OF CONTRACTOR (No., street, city, county, State and ZIP Code)
Envirosure Management Corp.
333 Ganson Street
Buffalo, NY 14203

8. DELIVERY
☐ FOB ORIGIN ☒ OTHER (See below)

9. DISCOUNT FOR PROMPT PAYMENT
Net 30

10. SUBMIT INVOICES (4 copies unless otherwise specified) TO THE ADDRESS SHOWN IN: ITEM
See block 6

CODE FACILITY CODE

11. SHIP TO/MARK FOR CODE
See Contract Terms

12. PAYMENT WILL BE MADE BY CODE SC4400
Defense Reutilization & Marketing Service
74 North Washington Ave., ATTN: DRMS-CFE
Battle Creek, MI 49017-3092

13. AUTHORITY FOR USING OTHER THAN FULL AND OPEN COMPETITION:
☐ 10 U.S.C. 2304(c)( ) ☐ 41 U.S.C. 253(c)( )

14. ACCOUNTING AND APPROPRIATION DATA
To be cited on each individual delivery order.

15A. ITEM NO.	15B. SUPPLIES/SERVICES	15C. QUANTITY	15D. UNIT	15E. UNIT PRICE	15F. AMOUNT
	This award document incorporates IFB solicitation, including the approved items 0001 through 0156.	DLA200-86-B-0014 and technical proposal.	your bid on	Accepted as to	that ESTIMATED

15G. TOTAL AMOUNT OF CONTRACT ▶ $2,097,071.00

16. TABLE OF CONTENTS

(X)	SEC.	DESCRIPTION	PAGE(S)	(X)	SEC.	DESCRIPTION	PAGE(S)
		PART I — THE SCHEDULE				PART II — CONTRACT CLAUSES	
X	A	SOLICITATION/CONTRACT FORM	1	X	I	CONTRACT CLAUSES	38-52
X	B	SUPPLIES OR SERVICES AND PRICES/COSTS	2-13			PART III — LIST OF DOCUMENTS, EXHIBITS AND OTHER ATTACH.	
X	C	DESCRIPTION/SPECS./WORK STATEMENT	14-22	X	J	LIST OF ATTACHMENTS	53
X	D	PACKAGING AND MARKING	23			PART IV — REPRESENTATIONS AND INSTRUCTIONS	
X	E	INSPECTION AND ACCEPTANCE	24-25		K	REPRESENTATIONS, CERTIFICATIONS AND OTHER STATEMENTS OF OFFERORS	
X	F	DELIVERIES OR PERFORMANCE	26-27		L	INSTRS., CONDS., AND NOTICES TO OFFERORS	
X	G	CONTRACT ADMINISTRATION DATA	28-30		M	EVALUATION FACTORS FOR AWARD	
X	H	SPECIAL CONTRACT REQUIREMENTS	31-37				

CONTRACTING OFFICER WILL COMPLETE ITEM 17 OR 18 AS APPLICABLE

17. ☐ CONTRACTOR'S NEGOTIATED AGREEMENT (Contractor is required to sign this document and return _____ copies to issuing office.) Contractor agrees to furnish and deliver all items or perform all the services set forth or otherwise identified above and on any continuation sheets for the consideration stated herein. The rights and obligations of the parties to this contract shall be subject to and governed by the following documents: (a) this award/contract, (b) the solicitation, if any, and (c) such provisions, representations, certifications, and specifications, as are attached or incorporated by reference herein. (Attachments are listed herein.)

18. ☐ AWARD (Contractor is not required to sign this document.) Your offer on Solicitation Number DLA200-86-B-0014, including the additions or changes made by you which additions or changes are set forth in full above, is hereby accepted as to the items listed above and on any continuation sheets. This award consummates the contract which consists of the following documents: (a) the Government's solicitation and your offer, and (b) this award/contract. No further contractual document is necessary.

19A. NAME AND TITLE OF SIGNER (Type or print)
John P Seitz
Manager Government Contracts

20A. NAME OF CONTRACTING OFFICER
RONALD W. WAGNER

19B. NAME OF CONTRACTOR	19C. DATE SIGNED	20B. UNITED STATES OF AMERICA	20C. DATE SIGNED
BY John P Seitz (Signature of person authorized to sign)	10-7-86	BY Ronald W. Wagner (Signature of Contracting Officer)	8 OCT 86

NAME OF OFFEROR OR CONTRACTOR

BIDDING SCHEDULE — MAXIMUM

ITEM NO.	SECTION B SUPPLIES/SERVICES & PRICE/COST	QUANTITY	UNIT	UNIT PRICE	AMOUNT
0144	Miscellaneous Chemicals, Oxidizers (as defined in DOT Regulations 49 CFR 173.151)	2,000	GL	4.50	
0145	Miscellaneous Chemicals, Oxiders (as defined in DOT Regulations 49 CFR 173.151)	2,500	LB	0.50	
0146	Miscellaneous Chemicals, Combustible (as defined in DOT Regulations 49 CFR 173.115)	14,000	GL	4.00	
0147	Miscellaneous Chemicals, Combustible (as defined in DOT Regulations 49 CFR 173.115)	18,500	LB	0.44	
0148	Miscellaneous Chemicals, Flammable (as defined in DOT Regulations 49 CFR 173.115)	15,000	GL	3.85	
0149	Miscellaneous Chemicals, Ignitable (as defined in DOT Regulations 49 CFR 173.115)	19,500	LB	0.44	
0150	Miscellaneous Chemicals, Corrosive (as defined in EPA Regulations 40 CFR 261.22)	8,000	GL	4.20	
0151	Miscellaneous Chemicals, Corrosive (as defined in EPA Regulations 40 CFR 261.22)	10,500	LB	0.44	
0152	Miscellaneous Chemicals, Reactive (as defined in EPA Regulations 40 CFR 261.23)	1,000	GL	10.00	
0153	Miscellaneous Chemicals, Reactive (as defined in EPA Regulations 40 CFR 261.23)	1,500	LB	6.00	
0154	Miscellaneous Chemicals, Toxic (as defined in EPA Regulation 40 CFR 261.24) Non-PCB	8,000	GL	4.00	
0155	Miscellaneous Chemicals, Toxic (as defined in EPA Regulation 40 CFR 261.24) Non-PCB	10,500	LB	0.50	
0156	Blast Residue (may be contaminated with but not limited to heavy metal and sand)	300,000	lb	0.35	

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U U N C L A S S I F I E D U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

ROUTINE

R 200031Z OCT 86

FM CMC WASHINGTON DC

TO ALMAR

UNCLAS //N02300//

ALMAR 238/86
SUBJ: OFFICE CODES/SYMBOLS IN MESSAGE HEADING

A. NTP-3(F)
B. MCO 5216.9R HQMC ORGANIZATION AND ORGANIZATION CODES

1. REF A PROVIDES GUIDANCE FOR THE DRAFTING AND PREPARATION OF NAVAL MESSAGES AND IS PRESENTLY BEING REVISED TO ALLOW MARINE CORPS USE OF OFFICE CODES AND SYMBOLS IN MSG HEADINGS.

2. TO FACILITATE PROCESSING TIME AND ROUTING ACCURACY, COMMANDS/ ACTIVITIES ARE AUTHORIZED TO BEGIN USING OFFICE CODES AND SYMBOLS WITH BOTH THE ORIG AND RECEIVING ADDRESSEES OF ALL OUTGOING MSGS UPON RECEIPT OF THIS ALMAR.

3. EFF 1 FEB 87, OFFICE CODES AND SYMBOLS, WHEN KNOWN, ARE

DLVR:CG SIXTH MAB(6)...ACT
DLVR:FSMAO ONE CAMP LEJEUNE NC(2)...ACT
DLVR:RASC CAMP LEJEUNE NC(2)...ACT
DLVR:TWO SIX MAU SOC(5)...ACT
DLVR:HQ MARCOR LIAISON OFFICER CAMP LEJEUNE NC(2)...ACT
DLVR:MARCORENGSCOL CAMP LEJEUNE NC(2)...ACT
DLVR:ECOASTCMSYCOMPLEX CAMP LEJEUNE NC(4)...ACT
DLVR:INFTRNGSCOL CAMP LEJEUNE NC(2)...ACT
DLVR:MARCORSVCSPTSCOL CAMP LEJEUNE NC(2)...ACT

BFAC(2)...ACT FOR CG MCB CAMP LEJEUNE(118) /12/
BCOS(1) BSDO(1) CEOA(1) DOST(1) OICB(1) GSTF(12) SSTF(85) OCDR(14)

G-1(1)...ACT FOR CG II MAF(10) 17028/ 2/0093
CEO(1) G-2(1) G-3(2) G-4(1) G-5(1) SOG(1) S-S(1) ISM(1)

TAGM(1)...ACT FOR MTCC CAMP LEJEUNE NC(3) 17028/ 2/0003
MTCC(1) OICB(1)

SVC/ RTD:000-029/COPIES:0158

401534/293 1 OF 2 MATA0205 293/14:25Z 200031Z OCT 86
CSN:AUIB00403 CMC WASHINGTON

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U U N C L A S S I F I E D U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

REQUIRED FOR EACH ADDRESSEE (EXCEPT COMMERCIAL ADDRESSEES) ON ALL MARINE CORPS ORIGINATED NAVAL MSGS AND WILL BE:

A. IN THE "FROM" LINE TO IDENTIFY THE MSG ORIG'S CODE(S); E.G., FM CMC WASHINGTON DC//CCT//.

B. PLACED IMMEDIATELY FOLLOWING THE PLA IN THE "TO" AND/OR "INFO" LINES AND OFFSET BY DOUBLE SLANT SIGN (//), WITH A SINGLE SLANT SIGN (/) SEPARATING EACH OFFICE CODE WHEN MORE THAN ONE CODE IS USED. THE FIRST OFFICE CODE/SYMBOL WILL DESIGNATE ACTION OFFICE OR OFFICE HAVING PRIME INTEREST IN THE MSG; E.G., TO CMC WASHINGTON DC//CCT/LMC-1/RDS/MMEA-4//.

C. AS SHORT AS POSSIBLE AND CONTAIN NO MORE THAN EIGHT CHARACTERS IN ANY COMBINATION OF LETTERS, NUMBERS, HYPHENS, AND/OR PERIODS (NOT APPLICABLE TO OFFICE CODES/SYMBOLS OF OTHER SERVICES AND DOD ACTIVITIES). NO OTHER CHARACTERS ARE AUTHORIZED.

D. RESTRICTED TO AUTHORIZED ORGANIZATIONAL CODES/SYMBOLS.

E. LIMITED TO A SINGLE LINE WHEN COMBINED WITH THE PLA.

4. COMMANDS/ACTIVITIES NOW HAVE AN ADDITIONAL OPTION FOR THEIR SERVICING COMM CENTERS/MSG CENTERS TO ROUTE THEIR INCOMING MSGS IAW OFFICE CODES/SYMBOLS FOUND IN THE "TO" AND/OR "INFO" LINE(S) OF THE MSG HEADING.

5. CODEX PROCEDURES CTND IN REF B WILL CONTINUE UNTIL 1 FEB 87. THOSE OFFICE CODES/SYMBOLS LISTED IN ENCL (2) OF REF B REMAIN VALID AND WILL BE USED WHEN ADDRESSING MSGS TO THIS HQS. PAR 3 ABOVE APPLIES. A REVISED EDITION OF REF B WILL BE FORTHCOMING.

6. SELECT COMMANDS/ACTIVITIES WILL BE REQUESTED BY SEPCOR TO PROVIDE A STANDARDIZED CONSOLIDATED LIST OF OFFICE CODES/SYMBOLS FOR SUBSEQUENT PUBLISHING IN A NEW MARINE CORPS ORDER.

7. THIS ALMAR WILL REMAIN IN EFFECT UNTIL ISSUANCE OF MCO 2300.X (ADDRESSING SAME SUBJECT).

8. THIS ALMAR IS APPLICABLE TO THE MARINE CORPS RESERVE.

BT

JMW File Haz Waste

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

4-16-86
Date

From: Director
To: Danny
Subj:

I agree with local (HSIRMC) training locally if we can arrange. Do you think CPO could arrange? BMO indicates he will pay for local training

Julian

I have put our name in the pot for postings this Next year.
D Stange

Yes!

HM

Recommend A Training Committee be set up made up of CPO, BFire, Base Safety, AND [redacted] NREAD to Arrange. A Contractual Arrangement with community college would be a great Approach there

DISTRIBUTION
BMO
ABMO
Admin D.
Oper D.
M&R D.
Util D.
F&A O.
Supp O.
MME
Maint NCO
Secretary

ERR PARRIS ISLAND SC
AMP LEJEUNE NC
RIVER NC

COMMENTS:
NREAD: Is this something we should try to get put on here so we can get a group trained. TAD funds are short but normally we can afford funding the instructors

NCIDENT RESPONSE MANAGEMENT

TED AS ON-SCENE COMMANDERS (OSCDRS' OR LEADER OF A HAZARDOUS SUBSTANCE ON SCENE OPERATIONS TEAM .OSOT' AND ARE RESPONSIBLE FOR MGMT OF RESPONSE, CONTROL, CONTAINMENT, AND CLEANUP OF HAZARDOUS SUBSTANCE SPILLS.

SCOPE: AWARENESS OF HAZARDS INVOLVED IN SPILL RESPONSE AND INSTRUCTION IN SAFE AND ENVIRONMENTALLY SOUND OPERATIONS IN ACCORDANCE WITH ALL APPLICABLE EPA AND NAVY GUIDELINES.

2. ACTIVITIES WISHING TO NOMINATE PERS TO ATTEND SUBJECT TRAINING SHOULD SEND THE FOLLOWING INFO BY MSG TO THE NAVAL ENERGY AND ENVIRONMENTAL SUPPORT ACTIVITY .NEESA', PORT HUENEME, CA, WITH COPIES TO CMC .LFL' AND MCAS BEAUFORT IN FORMAT INDICATED BELOW:

MANP(2)...ACT FOR CG MCB CAMP LEJEUNE(121) 05100/ 1/0203
BCOS(1) BPMO(1) BSDO(1) CEOB(1) FMSS(1) FSMO(1) GSTF(12) OCDR(14)
OICB(1) SAFO(1) SSTF(85)

RTD:000-000/COPIES:0121

777953/084 1 OF 2 MATA0358 084/17:07Z 190131Z MAR 86
CSN:AUIA01288 CMC WASHINGTON

UNCLASSIFIED

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

NOMINEE'S NAME SSN CODE JOB TITLE
GRADE/RANK .ALSO, THE CLASS TITLE AND THE NAME AND PHONE
NUMBER FOR A LOCAL POC SHOULD APPEAR IN THE MSG.'

3. QUESTIONS REGARDING COURSE OF INSTRUCTION .COI' SHOULD BE DIRECTED TO NEESA POC, MR. DAN TANNER OR MR. SAM HIGUCHI, CODE 112H, AV 360-4504, FTS 799-4504, OR COMM .805) 982-4504.

BT

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

DISTRIBUTION
BMO
ABMO
Admin D.
Oper D.
M&R D.
Util D.
F&A O.
Sup O.
MME
Maint NCO
Secretary

DAWNY Shaepe

PRIORITY ROUTINE

P R 190131Z MAR 86

FM CMC WASHINGTON DC

TO CGMCDEC QUANTICO VA
CG MCLB ALBANY GA
CG MCAS CHERRY PT NC
MCAS BEAUFORT SC
CG MCRD ERR PARRIS LSLAND SC
CG MCB CAMP LEJEUNE NC
MCAS NEW RIVER NC

INFO NEESA PORT HUENEME CA

UNCLAS //N05100//

SUBJ: HAZARDOUS WASTE TRAINING

1. CLASS TITLE: HAZARDOUS SUBSTANCE INCIDENT RESPONSE MANAGEMENT COURSE .HSIRMC!
DATES: APR 21-25
TIME: 0800-1600
NOMINATION DEADLINE: 28 MAR 86
LOCATION: MCAS BEAUFORT
TUITION: NONE
CLASS SIZE: 26
TARGET AUDIENCE: PERSONNEL DESIGNATED AS ON-SCENE COMMANDERS (OSCDRS! OR LEADER OF A HAZARDOUS SUBSTANCE ON SCENE OPERATIONS TEAM .OSOT! AND ARE RESPONSIBLE FOR MGMT OF RESPONSE, CONTROL, CONTAINMENT, AND CLEANUP OF HAZARDOUS SUBSTANCE SPILLS.
SCOPE: AWARENESS OF HAZARDS INVOLVED IN SPILL RESPONSE AND INSTRUCTION IN SAFE AND ENVIRONMENTALLY SOUND OPERATIONS IN ACCORDANCE WITH ALL APPLICABLE EPA AND NAVY GUIDELINES.

2. ACTIVITIES WISHING TO NOMINATE PERS TO ATTEND SUBJECT TRAINING SHOULD SEND THE FOLLOWING INFO BY MSG TO THE NAVAL ENERGY AND ENVIRONMENTAL SUPPORT ACTIVITY .NEESA!, PORT HUENEME, CA, WITH COPIES TO CMC .LFL! AND MCAS BEAUFORT IN FORMAT INDICATED BELOW:

MANP(2)...ACT FOR CG MCB CAMP LEJEUNE(121) 05100/ 1/0203
BCOS(1) BPMO(1) BSDO(1) CEOB(1) FMSS(1) FSMO(1) GSTF(12) OCDR(14)
OICB(1) SAFO(1) SSTF(85)

RTD:000-000/COPIES:0121

777953/084 1 OF 2 MATA0358 084/17:07Z 190131Z MAR 86
CSN:AUIA01288 CMC WASHINGTON

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

NOMINEE'S NAME SSN CODE JOB TITLE
GRADE/RANK .ALSO, THE CLASS TITLE AND THE NAME AND PHONE
NUMBER FOR A LOCAL POC SHOULD APPEAR IN THE MSG.'

3. QUESTIONS REGARDING COURSE OF INSTRUCTION .COI' SHOULD BE DIRECTED TO NEESA POC, MR. DAN TANNER OR MR. SAM HIGUCHI, CODE 112H, AV 360-4504, FTS 799-4504, OR COMM .805) 982-4504.

BT

777953/084 2 OF 2 MATA0358 084/17:07Z 190131Z MAR 86
CSN:AUIA01288 CMC WASHINGTON

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

Yes!

HM

Recommend A Training Committee be set up made up of CPO, BFire, Base Safety, AND [redacted] NREAD to Arrange.

A Contractual Arrangement with Community College would be a great Approach - Sharpe

Becker

Comment and

will return

To Jim

Shaw

fdw NREAO [redacted]

ROUTING SLIP

	ACTION	INFO	INITIAL
BMO			
ABMO			
ADMIN			
F&A			
MAINT NCO			
M&R			
OPNS			
PROP			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

NREAO: Is this something we should try to get put on here so we can get a group trained. TAD funds are short but normally we can afford funding the instructors

[redacted]

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

6280/9
FAC
25 JUL 1986

MEMORANDUM FOR THE COMMANDING GENERAL
CHIEF OF STAFF

Subj: VISIT BY ENVIRONMENTAL PROTECTION AGENCY, REGION IV, ATLANTA

1. Environmental Protection Agency (EPA) personnel from the Federal Activities and "Superfund" offices will visit on Thursday and Friday, 31 July and 1 August. Their purpose is to give their review of the NACIP program (study of inactive hazardous waste sites). EPA and LANTDIV have requested the review which will include state environmental officials.

2. The following itinerary is planned:

Thursday, 31 July (Building 1, Facilities Conference Room)

0800 - 1000	EPA comments
1000 - 1200	LANTDIV update on NACIP
1300 - 1400	NC review
1400 - 1500	Briefing on water systems
1500 - 1600	EPA Briefing on regulations

Friday, 1 August

0800 - 1030	Tour of NACIP sites (Industrial Area Tank Farm) (Hadnot Point Burn Dump) (MCAS Fuel Farm) (Camp Geiger Dump)
1030 - 1100	Enroute to Building 1
1100 - 1130	Outbrief

Very respectfully,

T. J. Dalzell

T. J. DALZELL
AC/S, Facilities

Copy to:
SJA
MAIN
NREAD
EnvEngr

AGENDA

REVIEW OF N.A.C.I.P. PROGRAM

MARINE CORPS BASE

CAMP LEJEUNE

31 JULY 1986

Thursday, 31 July

0830-0840	Welcome & Introductions	COL Dalzell, Asst. Chief of Staff, Facilities
0840-1030	U.S.E.P.A. Comments	Region IV Staff
1030-1200	Confirmation Study Update	LANTDIV and Envir. Science & Engr.
1200-1300	Lunch, No host	
1300-1400	Tarawa Terrace Update	N.C. Div. of Env. Mgt.
1400-1500	Review of Drinking Water Systems	Base Utilities Branch
1500-1600	Review of RCRA Regulations	EPA/State Staff

Friday, 1 August

0800-1200	Tour of N.A.C.I.P. Sites	
1200-1330	Lunch, No host	
1330-1400	Outbrief, Bldg 1	

N.A.C.I.P. Review

Camp Lejeune, NC

Name	Representing	Phone
ROBERT GREGORY	ESE -- GAINESVILLE, FL	904-332-3318
G.S. JOHNSON, JR.	UTILITIES / BASE MAINT.	919-451-5161
W R PRICE	UTILITIES / BASE MAINT.	919-451-5988
Lou Mancuso	EPA Region IV, (WCS)	404-347 3016
Andrew Puffer	EPA Region IV - Superfund	404-347-2643
Thomas H Barbee	NREAD, CAMPLEJEUNE, NC	919-451-5977
James L. Holdaway	EPA REGION IV FEDERAL FACILITIES	(404) 347-3776
WAYNE R. MATHIS	EPA REG III, ERRB	(404) 347-2643
ARTHUR G. LINTON	EPA REG. IV REGIONAL FED. FAC. COORD.	404-347 3776 FTS 257 3776
RICK SHIVER	N.C. DIVISION OF ENVIRONMENTAL MANAGEMENT (DEM) - GROUNDWATER SECTION	(919) 256-4161
JULIAN WOOTEN	NAT RES & ENV AFFAIRS DIV MCB CL N.C.	FTS-676-5003 919-451-5003
ELIZABETH A. BETZ	NAT RES + ENV AFFAIRS DIV MCB, CL, NC	FTS 676-5977 919-451-5977
Lee Laymon	N.C. Div. Environm. Mgt. Groundwater Section	919-733-5083
DOUGLASS DIXON	NC DEPT. OF NATL. RESOURCES & COMM. DEV. DIVISION OF ENVIRONMENTAL MGT. GROUNDWATER SECTION	919-733-5083
Colonel Tom Dalzell USMC	Asst Chief of Staff, Facilities Marine Corps Base Camp Lejeune	(919) 451-3034/35 (AV) 484
CHERRYL BARNETT	ATLANTIC DIVISION, NAVAL FACILITIES ENGINEERING COMMAND	(804) 445-1814

DRAFT 3/28/86
Draft II

I. CONFERENCE LANGUAGE

SEC. 120 FEDERAL FACILITIES

(a) IN GENERAL - Title I of CERCLA is amended by adding the following new section after section 119:

"SEC. 120 FEDERAL FACILITIES

"(a) APPLICATION OF ACT TO FEDERAL GOVERNMENT. -

"(1) IN GENERAL - Each department, agency, and instrumentality of the United States (including the executive, legislative, and judicial branches of government) shall be subject to, and comply with, this Act in the same manner and to the same extent, both procedurally and substantively, as an nongovernmental entity, including liability under section 107 of this Act. Nothing in this section shall be construed to affect the liability of any person or entity under sections 106 and 107.

"(2) APPLICATION OF REQUIREMENTS TO FEDERAL FACILITIES. - All guidelines, rules, regulations, and criteria which are applicable to preliminary assessments carried out under the this Act for facilities at which hazardous substances are located, applicable to evaluations of such facilities under the National Contingency Plan, applicable to inclusion on the National Priority List, or applicable to remedial actions at such facilities shall also be applicable to facilities which are owned and operated by a department, agency, or instrumentality of the United States in the same manner and to the extent as such guidelines, rules, regulations, and criteria are applicable to other facilities. No department,

agency, or instrumentality of the United States may adopt or utilize any such guidelines, rules, regulations, or criteria which are inconsistent with the guidelines, rules, regulations, and criteria established by the Administrator under this Act.

"(3) EXCEPTIONS. - This subsection shall not apply to the extent otherwise provided in this section with respect to applicable time periods. This subsection shall also not apply to any requirements relating to bonding, insurance, or financial responsibility. Nothing in this Act shall be construed to require a State to comply with section 104(c)(3) in the case of a facility which is owned or operated by any department, agency, or instrumentality of the United States.

"(4) STATE LAWS. - State laws concerning removal and remedial action, including State laws regarding enforcement, shall apply to removal and remedial action at facilities owned or operated by a department, agency, or instrumentality of the United States when such facilities are not included on the National Priorites List. The preceding sentence shall not apply to the extent a State law would apply any standard or requirement to such facilities which is more stringent than the standards and requirements applicable to facilities which are not owned or operated by any such department, agency, or instrumentality.

"(b) NOTICE. - Each department, agency, and instrumentality of the United States shall add to the inventory of Federal agency hazardous waste facilities required to be submitted under section 3016 of the Solid Waste Disposal Act (in addition to the information required under section 3016(a)(3) of such Act) information on contamination from each facility owned or operated by the department, agency, or instrumentality if such contamination affects contiguous or adjacent property owned by the department, agency, or instrumentality or by any other person, including a description of the monitoring data obtained.

"(c) FEDERAL AGENCY HAZARDOUS WASTE COMPLIANCE DOCKET. -

"(1) The Administrator shall establish a special Federal Agency Hazardous Waste Compliance Docket which shall contain all information submitted under section 3016 of the Solid Waste Disposal Act regarding any Federal facility and notice of each subsequent action taken under this Act with respect to the facility.

"(2) Information submitted by the department, agency, or instrumentality under 3005 or 3010 of such Act.

"(3) Information submitted by the department, agency, or instrumentality under section 103 of this Act.

Such docket shall be available for public inspection at reasonable times. Six months after establishment of the docket and every six months thereafter, the Administrator shall publish in the Federal Register a list of the Federal facilities which have been included in the docket during the immediately preceding

three-month period. Such publication shall also indicate where in the appropriate regional office of the Environmental Protection Agency additional information may be obtained with respect to any facility on the docket. The Administrator shall establish a program to provide information to the public with respect to facilities which are included in the Docket under this subsection.

"(d) ASSESSMENT AND EVALUATION. - Not later than eighteen months after the date of enactment of the Superfund Improvement Act of 1985, the Administrator shall take steps to assure that a preliminary assessment is conducted for each facility on the docket. Following such preliminary assessment, the Administrator sahll where appropriate -

"(1) evaluate such facilities in accordance with the criteria established in accordance with section 105 under the National Contingency Plan for determining priorities among releases.

"(2) include such facilities on the National Priorities List maintained under such plan. Such evaluation and listing shall be completed not later than 30 months after such date of enactment.

Upon the receipt of a petition from the Governor of any State, the Administrator shall make such an evaluation of any facility included in the docket. Such criteria shall be applied in the same manner as the criteria are applied to facilities which are owned or operated by other persons.

"(e) REQUIRED ACTION BY DEPARTMENT. -

"(1) RIFS. - Not later than six months after the inclusion of any facility on the National Priorities List, the department, agency, or instrumentality which owns or operates such facility shall, in consulation with the Administrator and appropriate State authorities, commence a remedial investigation and feasibility study for such facility. In the case of any facility which is listed on such list before the date of the enactment of this section, the department, agency, or instrumentality which owns or operates such facility shall, in consultation with the Administrator and appropriate State authorities, commence such an investigation and study for such facility within one year after such date of enactment. The agreement shall provide for a timetable and deadlines for commencement and expeditious completion of such investigation and study.

"(2) COMMENCEMENT OF REMEDIAL ACTION; INTERAGENCY AGREEMENT. - The Administrator shall review the results of each investigation and study conducted as provided in paragraph (1). Within 180 days thereafter, the head of the department, agency, or instrumentality concerned shall enter into an interagency agreement with the Administrator for the expeditious completion by such department, agency, or instrumentality of all necessary remedial action at such facility. Substantial continuous physical onsite remedial action shall be commenced at each facility not later than 15 months after completion of the investigation and study.

"(3) COMPLETION OF REMEDIAL ACTIONS. - Remedial actions at facilities subject to interagency agreements under this section shall be completed as expeditiously as practicable. Each agency shall include in its annual budget submissions to the Congress a review of alternative agency funding which could be used to provide for the costs of remedial action. The budget submission shall also include a statement of the hazard posed by the facility to human health, welfare and the environment and identify the specific consequences of failure to begin and complete remedial action. All such interagency agreements shall comply with the public participation requirements of section 104(j). For purposes of public participation in accordance with section 117, the proposal of a plan for remedial action in an interagency shall be treated as the proposal of a plan for remedial action and the adoption of such an agreement shall be treated as the adoption of a final plan.

"(4) CONTENTS OF AGREEMENT. - Each interagency under this subsection shall include, but shall not be limited to, each of the following:

"(A) A review of alternative remedial actions and selection of a remedial action by the head of the relevant department, agency, or instrumentality and the Administrator or, if unable to reach agreement on selection of a remedial action, selection by the Administrator.

"(B) A schedule for the completion of each such remedial action.

"(C) Arrangements for long-term operation and maintenance of the facility.

"(5) ANNUAL REPORT. - Each department, agency, or instrumentality responsible for compliance with this section shall furnish an annual report to the Congress concerning its progress in implementing the requirements of this section. Such reports shall includes, but shall not be limited to, each of the following items:

"(A) A report on the progress in reaching interagency agreements under this section.

"(B) The specific cost estimates and budgetary proposals involved in each interagency agreement.

"(C) A report on progress in conducting investigations and studies under paragraph (1).

"(D) A report on progress in conducting remedial actions.

"(E) A report on progress in conducting remedial action at facilities which are not listed on the National Priorities List.

"(F) A brief summary of the public comments regarding each proposed interagency agreement.

"(G) A description of the instances in which no agreement was reached.

With respect to instances in which no agreement was reached within the required time period, the department, agency, or instrumentality filing the report under this paragraph shall include in such report an explanation of the reasons why no agreement was reached.

The annual report required by this paragraph shall also contain a detailed description on a State-by-State basis of the status of each facility subject to this section, including a description of the hazard presented by each facility, plans and schedules for initiating and completing response action, enforcement status (where appropriate), and an explanation of any postponements or failure to complete response action. Such reports shall also be submitted to the affect States.

"(6) SETTLEMENTS WITH OTHER PARTIES. - If the Administrator, in consultation with the head of the relevant department, agency, or instrumentality of the United States, determines that remedial investigations and feasibility studies or remedial action will be done properly at the Federal facility by another potentially responsible party within the deadlines provided in paragraphs (1), (2), and (3) of this subsection, the Administrator may enter into an agreement with such party under section 122. Following approval of the agreement by the Attorney General, the agreement shall be entered in the appropriate United States district court as a consent decree under section 106 of this Act.

"(7) STATE AND LOCAL PARTICIPATION. -

"(A) the Administrator shall consult with the relevant officials of the State and locality in which the facility is located and shall consider their views in selecting the remedial action to be carried out at the facility.

"(B) Each department, agency, or instrumentality responsible for compliance with this section shall afford to relevant State and local officials the opportunity to participate in the planning and formulation of the remedial action, including but not limited the review of all applicable data as it becomes available and the development of studies, reports, and action plans.

"(f) TRANSFER OF AUTHORITIES. - Except for authorities which are delegated by the Administrator to an officer or employee of the Environmental Protection Agency, no authority vested in the Administrator under this section may be transferred, by executive order of the President or otherwise, to any other officer or employee of the United States or to any other person.

"(g) PROPERTY TRANSFERRED BY FEDERAL AGENCIES. -

"(1) NOTICE. - After the last day of the six-month period beginning on the effective date of regulations under paragraph (2) of this subsection, whenever any department, agency, or instrumentality of the United States enters into any control for the sale or other transfer of real property which is owned by the United States and on which any federally regulated hazardous substance was stored for one year or more, known to have been released, or disposed of, the head of such department, agency, or instrumentality shall include in such contract notice of the type and quantity of such hazardous substance and notice of the time at which such storage, release, or disposal took place, to the extent such information is available on the basis of a complete search of agency files.

"(2) FORM OF NOTICE; REGULATIONS. - Notice under this subsection shall be provided in such form and manner as may be provided in regulations promulgated by the Administrator. As promptly as practicable after the date of the enactment of this subsection but not later than 18 months after such date of enactment, and after consultation with the Administrator of the General Services Administration, the Administrator shall promulgate regulations regarding the notice required to be provided under this subsection.

"(3) CONTENTS OF CERTAIN DEEDS. - After the last day of the six-month period beginning on the effective date of regulations under paragraph (2) of this subsection, in the case of any real property owned by the United States on which any hazardous substance was stored for one year or more, known to have been released, or disposed of, each deed entered into for the transfer of such property by the United States to any other person or entity shall contain -

"(A) to the extent such information is available on the basis of a complete search of agency files -

"(i) a notice of the type and quantity of such hazardous substances,

"(ii) notice of the time at which such storage, release, or disposal took place, and

"(iii) a description of the remedial action taken, if any, and

"(B) a covenant warranting that-

"(i) all remedial action necessary to protect human health and the environment with respect to any such substance remaining on the property has been taken befor the date of such transfer, and

"(ii) any additional remedial action found to be necessary after the date of such transfer shall be conducted by the United States.

The requirements of subparagraph (B) shall not apply in any case in which the person or entity to whom the property is transferred is a potentially responsible party (as defined in section 122(j) with respect to such real property.

"(h) OBLIGATIONS UNDER SOLID WASTE ACT. - Nothing in this section shall affect or impair the obligation of any department, agency, or instrumentality of the United States to comply with any requirement of the Solid Waste Disposal Act (including corrective action requirements).

"(i) NATIONAL SECURITY. -

"(1) SITE SPECIFIC PRESIDENTIAL ORDERS. - The President may issue such orders regarding response actions at any specified site or facility of the Department of Energy or the Department of Defense as may be necessary to protect the national security interests of the United States at that site or facility. Such orders may include, where necessary to protect such interests, an exemption from any requirement contained in this title or under title III of the Superfund Amendments of 1985 with respect to the site or facility concerned. The President shall notify the Congress within 30 days of the issuance of an order under this paragraph providing for any such exemption. Such notification shall include a statement of the reasons for the granting of the exemption. An exemption under this paragraph shall be for a specified period which may not exceed 1 year.

Additional exemptions may be granted each upon the President's issuance of a new order under this paragraph for the site or facility concerned. Each such additional exemption shall be for a specified period which may not exceed 1 year. It is the intention of the Congress that whenever an exemption is issued under this paragraph the response action shall proceed as expeditiously as practicable. The Congress shall be notified periodically of the progress of any response action with respect to which an exemption has been issued under this paragraph. No such exemption shall be granted due to lack of appropriation unless the President shall have specifically requested such appropriation as a part of the budgetary process and the Congress shall have failed to make available such requested appropriation.

"(2) CLASSIFIED INFORMATION. - Notwithstanding any other provision of law, all requirements of the Atomic Energy Act and all Executive orders concerning the handling of restricted data and national security information, including 'need to know' requirements, shall be applicable to any grant of access to classified information under the provisions of this Act or under title III of the Superfund Amendments of 1985.

"(j) CITIZENS SUITS - [language to be provided to clarify in the statute that the Federal facilities provisions of the Act are subject to citizens' suits.]

II. STATEMENT OF MANAGERS

§120(c): COMPLIANCE DOCKET: "Following notification under Section 103, where the EPA Administrator concurs that a response to source, special nuclear or byproduct material (as defined by the AEA) is being conducted in accordance with the NCP under other Federal statutes, docketing under (c)(1)(C) is not required."

§120(d): ASSESSMEMT AND EVALUATION: "The provision requires placement of all qualifying Federal facilities on the National Priorities List no later than 30 months after the date of enactment. This deadline is intended to be an outside limit and establish the latest date on which facilities can be listed. Federal agencies and departments, working in conjunction with EPA, should make every effort to propose and list facilities in installments as soon as possible during the 30 month period, as the facilities are evaluated under the Hazard Ranking System."

§120(h): OBLIGATIONS UNDER SOLID WASTE ACT: "The phrase 'corrective action requirements' includes RCRA section 3004(u) requirements as set forth in EPA's recodification rule of July 15, 1985 and the interpretation published on March 5, 1986."

§120(i): NATIONAL SECURITY: "The national security waiver should be applied only on a site-specific and instance-specific basis, and with appropriate restraint. The waiver is intended to protect the legitimate national security interest of the United States. The waiver was included--as it has been

in other major Federal environmental laws--because the Departments of Defense and Energy expressed concern that operation of their facilities, vital to national security, could be seriously interfered with, particularly in time of war and other national emergencies. The national security waiver is not intended to routinely exempt response actions at Federal facilities from the public health and environmental standards imposed under the Act. Furthermore, the duration of the national security waiver is not intended to continue beyond the time required to protect legitimate national security interests. Such response actions should be conducted in an expeditious and sound manner that provides protection of human health and the environment."

§120(?): FEDERAL LAND MANAGERS: "The conferees intend that the Administrator shall take into account the special ecological and environmental missions of certain Federal land managers, such as the Fish and Wildlife Service, when fulfilling the requirements of this section. The Administrator shall consider closely the plans for remedial actions recommended by these Federal officials to ensure that response actions undertaken pursuant to this act are compatible with the ecological and environmental responsibilities of these other Federal agencies."

11000
NREAD

15 Apr 1986

Supervisory Ecologist, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune

ANALYSIS OF WATER AND HAZARDOUS SUBSTANCES USING GAS CHROMATOGRAPHY

1. The purpose of this memorandum is to request permission to discontinue efforts to develop the capability to perform the subject analysis inhouse and to dispose of the gas chromatograph. As you are aware, I and the Supervisory Chemist opposed the original acquisition of this complex analytical equipment. This opposition was based both on the additional manpower required and the likely requirement to upgrade one or more laboratory technicians. Recent budget cutting efforts argue strongly against this initiative.

2. Successful implementation of a major upgrade of this nature requires total command support, including the Manpower Department. The chain of events which have occurred leading up to and during the appeal of the Supervisory Chemists position classification have convinced me that adequate support is lacking and that continuing the initiative to develop the subject capability is a fruitless endeavor. This initiative has and will continue to adversely affect the more important aspects of our responsibility to protect public health and assist in compliance with environmental standards and regulations.

3. I recommend that the subject analysis be performed through contracts with commercial laboratories. While this will be more expensive, Base's liability for damages resulting from failure of analysis to identify presence of toxic contamination of either water or hazardous wastes will be considerably less and is worth the expense.

4. On a related matter, I do not believe this action has any significant impact on the Supervisory Chemist's appeal, in that operating a gas chromotograph is not grade controlling for her personally. In fact, I believe that knowledge of gas chromotography is required by the Supervisory Chemist in order to properly deal with commercial laboratories and to quality control their work.

D. D. SHARPE

Writer: D. D. Sharpe, NREAD 1690
Typist: J. Cross 15Apr86