FILE FOLDER

DESCRIPTION ON TAB:

6240/3 HM/HW Disposal

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New Bern, NC
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6241/1
NREAD(L)
DEC 0 5 1986

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

Subj: LABORATORY ANALYSIS OF HAZARDOUS MATERIAL; RESULTS OF

Ref: (a) BO 6240.5

Encl: (1) Excerpts from JTC Environmental Consultants, Inc. Report No. 54 dated 28 June 1985
(2) Hazardous Waste Characteristic Analysis of Barrels at FC-251

1. Enclosure (1) and (2) show that the two barrels located at FC-251 area a corrosive liquid with toxic levels of metals. It is recommended that the barrels be disposed of as a D002 Hazardous Waste (HW) per the reference. The secondary HW numbers shown in enclosure (2) should also be shown on turn in documents and labels.

2. Point of contact is Ms. Elizabeth Betz, at extension 5977.

J. I. WOOTEN
By direction

Copy to:
2d FSSG (Facilities & Safety Office)
AC/S Fac

Blind copy to:
Lab (NREAD)

EXCERPTS FROM JTC ENVIRONMENTAL CONSULTANTS, INC.
REPORT NO. 54, DATED 28 JUNE 1985

COMPILED BY ELIZABETH A. BETZ
7 AUGUST 1985

Please note the following:

a. Navy sample ID #27H and 27I are two 55-gallon drums at Bldg 251. The barrels were labelled with H and I when they were sampled.

(ENCLOSURE 1)

JTC Environmental Consultants, Inc.

Date 6-28-85 Report No. 54 to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 85-254 Table 1 Date of Sample Receipt 3/28/85 & 5/23/85

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		pH (Corrosivity)	Flashpoint °F	Reactivity Cyanide ppm	Reactivity Sulfide ppm	PCB µg/g			
3A Bldg HP100	12-0920	7.18	< 85	0.9	<1	<1			
3B Bldg HP100	12-0921	6.55	< 85	<1.0	<1	<1			
7H Bldg 251	12-0922	1.52	>200	0.02	<0.1	<1			
7I Bldg 251	12-0923	<1.0	>200	0.03	<0.1	<5			
8J Landfill	composite 12-0924	6.32	>200	<0.10	1.0	<5			
8K Landfill	composite 12-0925								
8L Landfill	composite 12-0926								
29 Bldg TP457	12-0927	<1.0	153	<0.05	<0.1	<1			
30 Bldg TP457	12-0928	4.89	<85	<0.05	<0.2	<10			
31 Bldg TP457	12-0929	5.25	<85	<0.05	<0.5	<10			
20 Bldg TP451	12-0930	9.56	<85	<1.0	<0.5	<10			
2P Bldg TP451	12-0931	6.85	<85	6.2	<1	0.05 µg/ml			
2Q Bldg TP451	12-0932	6.91	<85	<1.0	<0.5	<0.1 µg/ml			

JTC Environmental Consultants, Inc.

Date 6-28-85 Report No. 54 to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 85-254 Table 5 Date of Sample Receipt 3/28/85 & 5/23/8

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		As	Ba	Cd	Cr	Pb	Hg	Se	Ag
3A Bldg HP100	12-0920	<1.0 mg/kg	<20 mg/kg	22.6 mg/kg	1.6 mg/kg	148 mg/kg	0.18 mg/kg	1.5 mg/kg	<1.0
3B Bldg HP100	12-0921	<1.0 mg/kg	<20 mg/kg	4.8 mg/kg	1.4 mg/kg	0.8 mg/kg	<0.10 mg/kg	2.2 mg/kg	<1.0
7H Bldg 251	12-0922	<50 µg/L	1170 µg/L	2440 µg/L	65 µg/L	9850 µg/L	<1.0 µg/L	141 µg/L	<50
7I Bldg 251	12-0923	290 µg/L	<1000 µg/L	680 µg/L	13,100 µg/L	3,120 µg/L	<1.0 µg/L	1960 µg/L	<50
8J Landfill (Disposal Area)	12-0924	2.3 mg/kg	<20 mg/kg	<0.50 mg/kg	2.3 mg/kg	4.5 mg/kg	<0.10 mg/kg	<0.40 mg/kg	<1.0
8K Landfill (Disposal Area)	12-0925								
8L Landfill (Disposal Area)	12-0926								
9 Bldg TP457	12-0927	*	*	*	*	*	*	*	*
0 Bldg TP457	12-0928	<50 µg/L	7800 µg/L	<25 µg/L	<50 µg/L	62.5 µg/L	22 µg/L	<20 µg/L	<50
1 Bldg TP457	12-0929	<50 µg/L	3130 µg/L	<25 µg/L	185 µg/L	21 µg/L	<1.0 µg/L	<20 µg/L	<50
20 Bldg TP451	12-0930	+	+	+	+	+	1925	+	+
P Bldg TP451	12-0931	<50 µg/L	1295 µg/L	<25 µg/L	63,600 µg/L	6250 µg/L	3.7 µg/L	<20 µg/L	<50
Q Bldg TP451	12-0932	<50 µg/L	1535 µg/L	130 µg/L	93,900 µg/L	40,200 µg/L	7.9 µg/L	<20 µg/L	<50

* sample depleted

\+ Sample requires redigestion prior to completion of analysis

CHARACTERISTICS	SAMPLE #27H	SAMPLE #27I	SAMPLE #86-	SAMPLE #86-0	SAMPLE #86-0	SAMPLE #86-	SAMPLE #86-	SAMPLE #86-
Corrosivity: pH	CORROSIVE 1.52	CORROSIVE <1.0						
Ignitability: Flash Point (140°F)	>200°F	>200°F						
Reactivity	mg/L	mg/L						
Cyanide (250mg /kg)	0.02	0.03						
Sulfide (500mg /kg)	<0.1	<0.1						
Toxcity-Limits	mg/L	mg/L						
As (5 ppm)	<0.05	0.290						
Ba (100 ppm)	1.17	<1.0						
Cd (1 ppm)	2.44	0.68						
Cr (5 ppm)	0.065	13.1						
Pb (5 ppm)	9.85	3.12						
Hg (0.2 ppm)	<0.001	<0.001						
Se (1.0 ppm)	0.141	1.96						
Ag (5 ppm)	<0.05	<0.05						
PCB mg/9	<1	<5						
Total Organic Halogen %	NOT TESTED →							
Recommended EPA Hazardous Waste ID#	D002	D002						
Comments: Secondary EPA Hazardous Waste ID #'s which should be shown	D006 D008	D007 D010						

Prepared by: Elizabeth Betz

Date: 21 Nov 86

ENCLOSURE (2)

6240
NREAD
NOV 20 1986

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

Subj: HAZARDOUS WASTE (HW) MANAGEMENT

Ref: (a) BO 6240.5
(b) CG MCB ltr 6240 NREAD of 15 July 1986

Encl: (1) CG MCB ltr 6240 NREAD of 10 Nov 1986

1. Reference (a) established the base HW management program. As a result of reference (b), addressees were appointed as Hazardous Material Disposal Officers (HMDOs). HMDOs are responsible for ensuring satisfactory implementation of requirements of reference (b) and related regulations within their respective organizations.

2. HMDOs are advised that on 16 December 1986 a HW training program will be held for primary and alternate HMDOs. The session will be from 0900-1100 hours in the Civilian Training Classroom, Building 1003, Hadnot Point Area. The session will address current issues regarding HW management. Also, guidance will be provided on techniques HMDOs can use for managing and controlling HW activity within their Commands.

3. On a separate issue, HMDOs are requested to take action required to have HW spill contingency plans posted in accordance with the enclosure. Deadline for posting the plans is 1 December 1986. It is presumed that ensuring the contingency plans are adequate and current will be an ongoing process.

4. Questions should be referred to the Base Hazardous Material Disposal Coordinator (HMDC), Mr. Sammy Gwynn, NREAD, extension 2083.

JULIAN I. WOOTEN

DISTRIBUTION:
MCES HMDO (Maj Ferrel)
RR Det HMDO (1stLt Dailey)
FMSS HMDO (Lt Hansen III)
MCSSS HMDO (1stLt Rule)
RSU HMDO (Capt Stroff)
ITS HMDO (WO Cote)
SUPBN HMDO (GySgt Diehl)
HQBN HMDO (CWO-2 Williams)
AC/S MWR HMDO (Mr. Parker)
AC/S MWR HMDO (Mr. Raynor)
AC/S LOG HMDO (Capt Peters)
BMO HMDO (Mr. Bullock)

6240
NREAD
Nov 10, 86

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 plan 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.

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

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.

SHEET ____ OF ____

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)

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

DEPARTMENT OF THE NAVY

Memorandum

6240
NREAD

DATE: 19 Nov 1986

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

TO: Base Maintenance Officer
Public Works Officer
Base Fire Chief

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

Encl: (1) SPCC Plan
(2) Oil and Hazardous Substance Spill Contingency Plan

1. Addressees are requested to review enclosures (1) and (2) and provide written comments by 15 December 1986. Point of contact is Mr. Danny Sharpe, NREAD, extension 1690.

Julian I. Wooten

JULIAN I. WOOTEN

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

6240
NREAD

19 Nov 1986

Director, Natural Resources and Environmental Affairs Division,
Marine Corps Base, Camp Lejeune
Base Maintenance Officer
Public Works Officer
Base Fire Chief

REVIEW OF REVISION OF SPCC PLANS AND OIL AND HAZARDOUS SUBSTANCE SPILL CONTINGENCY PLAN; REQUEST FOR

Encl: (1) SPCC Plan
(2) Oil and Hazardous Substance Spill Contingency Plan

1. Addressees are requested to review enclosures (1) and (2) and provide written comments by 15 December 1986. Point of contact is Mr. Danny Sharpe, NREAD, extension 1690.

JULIAN I. WOOTEN

File

File

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U UNCLASSIFIED U
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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)
UICR(1)

RTD:000-000/COPIES:0017

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

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
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C. FAILURE TO POST SITE SPECIFIC SPILL CONTINGENCY PLANS.
D. FAILURE TO PERFORM WEEKLY INSPECTIONS.
E. FAILURE TO PROPERLY LABEL CONTAINERS.
F. FAILURE TO PROPERLY 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. POC'S ARE CAPT J. REUTER OR MSGT VELEZ AT EXT 2417/2755 FOR FURTHER INFORMATION.

BT

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

Incl: (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 new 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

6240
NREAD
NOV 20 1986

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

Subj: HAZARDOUS WASTE (HW) MANAGEMENT

Ref: (a) BO 6240.5
(b) CG MCB ltr 6240 NREAD of 15 July 1986

Encl: (1) CG MCB ltr 6240 NREAD of 10 Nov 1986

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3. On a separate issue, HMDOs are requested to take action required to have HW spill contingency plans posted in accordance with the enclosure. Deadline for posting the plans is 1 December 1986. It is presumed that ensuring the contingency plans are adequate and current will be an ongoing process.

4. Questions should be referred to the Base Hazardous Material Disposal Coordinator (HMDC), Mr. Sammy Gwynn, NREAD, extension 2083.

JULIAN I. WOOTEN

DISTRIBUTION:
MCES HMDO (Maj Ferrel)
RR Det HMDO (1stLt Dailey)
FMSS HMDO (Lt Hansen III)
MCSSS HMDO (1stLt Rule)
RSU HMDO (Capt Stroff)
ITS HMDO (WO Cote)
SUPBN HMDO (GySgt Diehl)
HQBN HMDO (CWO-2 Williams)
AC/S MWR HMDO (Mr. Parker)
AC/S MWR HMDO (Mr. Raynor)
AC/S LOG HMDO (Capt Peters)
BMO HMDO (Mr. Bullock)

DDS

NREA

UNITED STATES MARINE CORPS
MARINE CORPS ENGINEER SCHOOL
MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA 28542-5040

IN REPLY REFER TO:
5100
SPT
24 Nov 86

From: Commanding Officer, Marine Corps Engineer School
To: Commanding General, Marine Corps Base, Camp Lejeune (AC/S Facilities)

Subj: HAZARDOUS WASTE COMPLIANCE INSPECTION OF MARINE CORPS ENGINEER SCHOOL OF 3 NOVEMBER 1986

Ref: (a) CG, MCB, CLNC ltr 6240, NREAD, dtd 10 Nov 86

Encl: (1) Noted Violations and Corrective Action

1. In response to paragraph 2 of the reference, all noted violations have been corrected as indicated in the enclosure.

2. This command is desirous of a courtesy visit by Mr. Danny Sharpe or other representatives from the Natural Resources and Environmental Affairs Division, and liaison has been made.

R. A. Tiebout
R. A. TIEBOUT

NOTED VIOLATIONS AND CORRECTIVE ACTION

1. DISCREPANCY

Failure to identify and correct obvious defective containers located at BB-51, Maintenance Facility.

CORRECTIVE ACTION

The contents within the defective container has been removed and the defective container has been disposed of in accordance with current directives. Currently all containers are checked for serviceability on a weekly basis.

2. DISCREPANCY

Failure to establish and maintain training records at Armory, BB-49.

CORRECTIVE ACTION

The Armory is no longer a Hazardous Waste site nor will it be in the future at Marine Corps Engineer School. All Hazardous Waste Handlers and alternates at Marine Corps Engineer School Hazardous Waste sites are maintaining proper training records in accordance with the reference and the guidance given by Mr. Danny Becker, of Natural Resources and Environmental Affairs.

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

ROUTING - REQUEST

Please

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

and

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

To DANNY DDS

THIS IS WHAT I'VE FOUND AS PENDING HM/HW PROJECTS

Date 24 NOV 86 From BETSY

File 25 Nov 86
Haz Waste
JLW

HW/HM PROJECTS

MCAS-NR

SUPPLY BATT, 2ND FSSG

3. SOLVENT FILTERS AT DRY CLEANER - RESPONSE ON WHETHER WITH NEW BAKER THEY CAN GO IN LANDFILL

4. WORK WITH 2ND MED LOG BATT, 2ND FSSG ~~WITH~~ ON THEIR HM/HW

5. PREPARE WRITTEN RESPONSE ON FLOOR FINISH ~~OF~~ FOR TECH + RESEARCH

6. DETERMINE IF DENTAL CLINIC SUMPS ARE IN COMPLIANCE WITH ~~&~~ STATE REGULATIONS

7. DETERMINE DISPOSAL PROCEDURE FOR BERYLLIUM FILTERS FOR DENTAL CLINIC

8. ASSIST LT GRAHAM AT NAVAL HOSPITAL ON THEIR HM/HW

9. PREPARE RESPONSE TO HIGH SCHOOL TO TURN THEIR OLD CHEMICALS INTO DRMO FOR DISPOSAL BY A LAB PACK IN A HW LANDFILL.

10. RESUBMIT ANALYSIS OF 2 BARRELS AT FC-251 FOR DISPOSAL.

11. RESPOND TO SAFETY KLEEN'S AUTHORIZATION REQUEST.

LIST OF PENDING HW/HM PROJECTS

1. SAMPLING THE 18 BARRELS + AT MCAS-NR

2. SAMPLING THE 22 BARRELS AT 2ND SUPPLY BATT, 2ND FSSG

3. SOLVENT FILTERS AT DRY CLEANER - RESPONSE ON WHETHER WITH NEW BAKER THEY CAN GO IN LANDFILL

4. WORK WITH 2ND MED LOG BATT, 2ND FSSG ~~WITH~~ ON THEIR HM/HW

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10. RESUBMIT ANALYSIS OF 2 BARRELS AT FC-251 FOR DISPOSAL.

11. RESPOND TO SAFETY KLEEN'S AUTHORIZATION REQUEST.

12. SET A NOTEBOOK APPROVED DISPOSAL PROCEDURES FOR ~~Tank~~ THE ENVIRONMENTAL BRANCH'S USE.

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

Elizabeth A. Betz

File
Hzy Waste

Dany DDS

6241/1
NREAD(L)
18 Nov 1986

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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

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

PRIORITY

P 182047Z NOV 86

FM CG MCB CAMP LEJEUNE NC//BLOG//

TO CG II MAF//SUPO/MMO//
CG SECOND MARDIV//SUPO/MMO//
CG SIXTH MAB//SUPO/MMO//
MCB CAMP LEJEUNE NC

UNCLAS //N04400//

SUBJ: REPLACEMENT OF FREON 12 AND FREON 22 REFILLABLE GAS CYLINDERS

A. CG MCB CAMP LEJEUNE NC MSG 071440Z OCT86

1. REF REQUEST COMMENTS ON FEASIBILITY OF STOCKING DISPOSABLE CYLINDERS BY 24OCT86 (TO INCLUDE NEG REPLIES). TO DATE HAVE NOT RECEIVED COMMENTS. PLEASE ADVISE.

BT

BLOG(2)...ORIG FOR CG MCB CAMP LEJEUNE(118) /15/
DSSC(1) BCOS(1) BSDO(1) CEOA(1) OICB(1) OCDR(14) SSTF(85) GSTF(12)

G-4(1)...ACT FOR CG II MAF(4) 04400/ 1/0080
CFU(1) SOG(1) S-S(1)

RTD:000-000/COPIES:0122

491864/322 1 OF 1 MATA0557 322/22:19Z 182047Z NOV 86
CSN:RXIC00013 CG MCB CAMP LE

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DDS

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

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
M. W. BOLISH
By direction

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

10-28-86
Date

From: Director
To:

Subj: File - Raleigh, N.C. Meeting

Hg Waste

JMW

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

(1) 10-27-86

* 31 Dec 86 Permit to EPA → Changed to early Dec 86 JdW

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

Forget agreement - Rhodes
issue compliance order

compliance order will put
Permit in jeopardy

95% compliance Rhodes

2 when to impact 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

Memorandum / and copy of Bens
contingency plan.

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

Be Friendly order * mr Rhodes

State way behind now

* Contingency Plan & Personnel
Turn over problem

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 00356

ATTENDING	REPRESENTING & PHONE NUMBER
Jerry Rhodes	NC SHWM Branch (919) 733-2178
Doug Holyfield	" " " " "
Carol M. Schiller	atty, N.C. SHWMB 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. Abdellington	Office of the Staff Judge Advocate, MCB, CL, NC 2321

27 Oct 86
Raleigh N.C. Meeting

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

STATEMENT
~~STIPULATIONS~~ 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 ~~a~~ 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 allegedly 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 obilgations which this Consent ~~Order~~ Agreement imposes will expose the USMCB to ~~any and all of the various~~ enforcement sanctions applicable to Federal installations 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 the action or inaction any authority over which it has no control. If the non compliance with ~~the~~ 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

DEFENSE LOGISTICS AGENCY

Inter-Office Memorandum

DAL

REPLY REFER TO DRMR-MOH

06 OCT 1986

SUBJECT: Environmental Quarterly Report

TO: Chiefs of DRMOs

1. Reference: DPDS-M 6050.1, Section IV, Chapter 5.

2. DRMO input is needed to adequately complete the subject report required per the above reference. It is requested that DRMOs supply the below listed information in the following format:

a. Number of inspections by Federal or State Environmental Agencies (include copies of written correspondence)

1. Problems identified

2. Steps taken toward resolution of those problems

b. Summary of Environmental Training

1. Employees trained

2. Name/Source of training

3. Hours of instruction received for each course

3. Submissions will cover the previous fiscal quarter and must be received by this office NLT the 5th day of the month following the end of that fiscal quarter. The first report is due 10 Oct 86.

4. Any problems or issues that need to be brought to this office's attention or any problems or issues previously mentioned but yet unresolved may be included in this quarterly submission.

5. Point of contact at the Memphis Region is Tommy Downing, (AV) 683-6690.

Fred Hamann

FRED C. HAMANN
Chief, Environmental Branch

File- 6240

Rifle Range Detachment
Marine Corps Base
Camp Lejeune, North Carolina 28542-5055

IN REPLY REFER TO:
6240
S-1
12 Nov 86

From: Commanding Officer, Rifle Range Detachment, MCB, Camp Lejeune
To: First Lieutenant Gerald J. O' Hara 170 54 70 05/3002 USMC

Subj: APPOINTMENT AS HAZARDOUS MATERIAL DISPOSAL OFFICER (PRIMARY)

Ref: (a) CG, MCB ltr 6240/NREAD dtd 15 Jul 86

1. In accordance with reference (a), you are hereby appointed as the Hazardous Material Disposal Officer (Primary) for the Rifle Range Detachment.

2. You are directed to familiarize yourself with the contents of references (a) and (b) which will guide you in the performance of your duties.

S. L. STROTHER
Acting

Copy to:
AC/S, Facilities

NREAD.

File- 6240

Marine Corps Base
Camp Lejeune, North Carolina 28542-5055

IN REPLY REFER TO:
6240
S-1
12 Nov 86

From: Commanding Officer, Rifle Range Detachment, MCB, Camp Lejeune
To: First Lieutenant Gerald J. O' Hara 170 54 70 05/3002 USMC

Subj: APPOINTMENT AS HAZARDOUS MATERIAL DISPOSAL OFFICER (PRIMARY)

Ref: (a) CG, MCB ltr 6240/NREAD dtd 15 Jul 86

1. In accordance with reference (a), you are hereby appointed as the Hazardous Material Disposal Officer (Primary) for the Rifle Range Detachment.

2. You are directed to familiarize yourself with the contents of references (a) and (b) which will guide you in the performance of your duties.

S. L. STROTHER
Acting

Copy to:
AC/S, Facilities

File - 6240

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.: DLA200-86-B-0014 / DLA200-86-R-0012

4. TYPE OF SOLICITATION: [XX] SEALED BID (IFB) [ ] NEGOTIATED (RFP)

5. DATE ISSUED: 11 Sept. 86

6. REQUISITION/PURCHASE NO.: 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: CONNIE MCGUIRE — B. TELEPHONE NO. (Include area code) (NO COLLECT CALLS): (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	K	REPRESENTATIONS, CERTIFICATIONS AND OTHER STATEMENTS OF OFFERORS	54-61
X	F	DELIVERIES OR PERFORMANCE	26-27				
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 ____

Envirosure Management Corp.
333 Ganson St.
Buffalo, NY 14203

15B. TELEPHONE NO. (Include area code)

15C. [ ] CHECK IF REMITTANCE ADDRESS IS DIFFERENT FROM ABOVE - ENTER SUCH ADDRESS IN SCHEDULE

16. NAME AND TITLE OF PERSON AUTHORIZED TO SIGN OFFER (Type or print)
Mr. Jack Seitz
Mgr. Gov't Contracts

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.

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

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	

311,[illegible].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 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, Dodecylbenzene 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	

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	

CONTINUATION SHEET	REFERENCE NO. OF DOCUMENT BEING CONTINUED DLA200-86-B-0014 DLA200-86-R-0012	PAGE 10 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
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)	550,500	GL	0.71	
	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				
0143A	Water Purification Tablets	200	LB	1.00	

AWARD/CONTRACT "J"

1. THIS CONTRACT IS A RATED ORDER UNDER DPAS (15 CFR 350) ▶ RATING: S-1

PAGE 1 OF 1 PAGES

2. CONTRACT (Proc. Inst. Ident.) NO.: DLA200-87-D-0002

3. EFFECTIVE DATE: See Block 20c

4. REQUISITION/PURCHASE REQUEST/PROJECT NO.: 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

CODE

FACILITY CODE

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

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 DLA200-86-B-0014 and your bid on solicitation, including the approved technical proposal. Accepted as to items 0001 through 0156.				that ESTIMATED

15G. TOTAL AMOUNT OF CONTRACT ▶ $2,097,071.00

16. TABLE OF CONTENTS

(W)	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	
	K	REPRESENTATIONS, CERTIFICATIONS AND OTHER STATEMENTS OF OFFERORS	
	L	INSTRS., CONDS., AND NOTICES TO OFFERORS	
	M	EVALUATION FACTORS FOR AWARD	

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

19B. NAME OF CONTRACTOR
BY John P Seitz (Signature of person authorized to sign)

19C. DATE SIGNED: 10-7-86

20A. NAME OF CONTRACTING OFFICER
RONALD W. WAGNER

20B. UNITED STATES OF AMERICA
BY Ronald W. Wagner (Signature of Contracting Officer)

20C. DATE SIGNED: 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	

File 6240.5

DEFENSE LOGISTICS AGENCY

Inter-Office Memorandum

To: Nadine Hipp

Have marked up this a little
And have Attached a description of
One problem identified at warehouse.
D Shaye
21 Oct 86

DRMO-ZUM (N. Hipp/484-5652/11p) 15 October 1986

SUBJECT: Environmental Quarterly Report

TO: DRMR-MOH

1. Reference: DRMR-MOH Memo, dated 6 Oct 86, subject as above.

2. As per request in referenced memo the following information is submitted:

a. On 27 Jun 86 DRMO Lejune had an inspection performed by Federal EPA and the State of North Carolina. No major problems were identified in our hazardous material/waste warehouses. Both agencies agreed we had an excellent operation.

b. One significant problem addressed was the lack of a trained back-up operator to fill in in the absence of our Environmentalist. I concur and have surfaced this problem before by requesting an additional billet to perform these duties. I have had several employees formally trained in the Hazardous Material/Waste course and COR training; however, I feel as a back-up in our operations that an employee needs to work with HM/HW on a daily basis in order for them to keep cognizant of constant changes in regulations, And to assist in reducing Turnaround Time on processing HW Turn in documents etc.. Currently I am cross training a wage grade employee as a back-up. This employee works with our Environmentalist two days a week and has been trained in COR duties and HM/HW courses.

c. Four employees had 40 hours of instructions on environmental. The Disposal Operations Course was given by USALMC, Fort Lee, Virginia.

d. All employees attended our monthly safety meeting "Working Safley with Solvents". This topic was presented by our Safety Representative. The source of training was from a hazardous waste bulletin published by the Bureau of Law & Business, Inc..

1 Incl
US EPA Inspection Report

Nadine Hipp
Chief, Defense Reutilization
and Marketing Office

FORM
(Y 82 111

PREVIOUS EDITION MAY BE
USED UNTIL EXHAUSTED

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.

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.

SHEET ____ OF ____

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)

File 6240.5 Attach to ALMAR MSG.

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ROUTINE

R 031240Z SEP 86

FM DRMR MEMPHIS TN//MEH//

TO ATG 4544

UNCLAS

DRMR-MEH 399-86 PASS TO DRMO S
SUBJ: STORAGE OF MAGNESIUM BATTERIES.

A. US ARMY CECOM MSG P311400Z JUL 86 NOTAL

1. THE REF MSG CITED AN INCIDENT WHERE DEPLETED MAGNESIUM BATTERIES WERE STORED IN AV UNVENTED 50-GALLON PLASTIC DRUM. HYDROGEN GAS BUILT UP IN THE DRUM CAUSING THE LID TO BLOW OFF. THEY WERE LUCKY - ONLY MINOR PROPERTY DAMAGE BUT NO INJURIES OCCURRED.

2. ALL DRMOS ARE REMINDED TO INSURE DEPLETED MAGNESIUM BATTERIES ARE PROPERLY STORED. THE FOLLOWING MEASURES SHOULD BE TAKEN:
A. THE AREA MUST BE COOL, DRY AND WELL VENTILATED. MAGNESIUM RE-ACTS WITH MOISTURE TO EVOLVE HYDROGEN GAS.
C. THEY MUST NOT COME IN CONTACT WITH WATER, STEAM, OXIDIZERS, ACIDS, ETC.

3. QUESTIONS MAY BE DIRECTED TO THE SAFETY OFFICE OR YOUR ENVIRONMENTAL SPECIALIST.

BT

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

RTD:070-000/COPIES:0004

263643/246 1 OF 1 MATA0226 246/14:06Z 031240Z SEP 86
CSN:AUIB00653 DRMR MEMPHIS T

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U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

ROUTINE

R 180238Z NOV 86

FM CMC WASHINGTON DC

TO ALMAR

UNCLAS //N04400//

ALMAR 276/86
CMC//CODEXLM/CODEXLMM/CODEXLMM-2/
SUBJ: MCO 4400.170 CH 1. CONTROL AND ACCOUNTABILITY OF PETROLEUM AND RELATED PRODUCTS/COAL

1. THIS CHANGE IS APPLICABLE TO MARINE CORPS ACTIVITIES ON DISTRIBUTION LIST E6.

2. ON PAGE 3 OF ENCLOSURE (1), CHANGE THE TITLE OF PARAGRAPH 2 TO READ: "REQUIREMENTS FOR INTERMEDIATE LEVEL ACTIVITIES (DSSC'S)."

3. ON PAGE 5 OF ENCLOSURE (1), CHANGE PARAGRAPH 2D(6) LINE 3, FROM "SEMIANNUALLY" TO "ANNUALLY."

4. ADD A NEW PARAGRAPH 3 TO ENCLOSURE (1) AS FOLLOWS:

DLVR:FSMAO ONE CAMP LEJEUNE NC(2)...ACT
DLVR:RASC CAMP LEJEUNE NC(2)...ACT
DLVR:TWO FOUR MAU(6)...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

BLOG(2)...ACT FOR CG MCB CAMP LEJEUNE(122) /12/
BCOS(1) BSDO(1) CEOA(1) DOST(1) OICB(1) DSSC(1) FSMO(1) MCEX(1)
RASC(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:000-050/COPIES:0162

491890/322 1 OF 2 MATA0543 322/22:26Z 180238Z NOV 86
CSN:AUIB00803 CMC WASHINGTON

"3. REQUIREMENTS FOR CONSUMER LEVEL ACTIVITIES

A. ESTABLISHMENT OF ACCOUNTING RECORDS. CUSTODY RECORDS WILL BE ESTABLISHED FOR ALL FUELS STORED IN STORAGE TANKS GREATER THAN A 50-GALLON CAPACITY AND MOBILE REFUELERS. (FIFTY-FIVE GALLON DRUMS OF PACKAGED POL ARE EXEMPT.) CUSTODY RECORDS FOR PETROLEUM AND RELATED PRODUCTS WILL BE MAINTAINED ON NAVMC FORM 708. EACH STORAGE TANK AND MOBILE REFUELING UNIT SHALL BE ESTABLISHED, MAINTAINED, AND MANAGED AS A SEPARATE ENTITY WITH SEPARATE STOCK RECORDS. THE CUSTODY RECORDS WILL TRACK INDIVIDUAL TRANSACTIONS OF RECEIPTS, ISSUES, AND GAIN/LOSS STATEMENTS FOR EACH FUEL DISPENSING POINT.

B. RECEIVING PROCEDURES

(1) INSPECT ALL INCOMING SHIPMENTS TO ENSURE THAT THE FUEL DELIVERED IS THE TYPE AND QUANTITY ORDERED AND THAT IT IS FREE OF WATER CONTAMINATION BY A VISUAL CHECK.

(2) AT THE RECEIVING ACTIVITY, A COPY OF THE RECEIPT/ISSUE INVOICE WILL BE MAINTAINED TO SUPPORT THE RECEIPT TRANSACTION IN THE CUSTODY RECORD.

C. ISSUE PROCEDURES

(1) FUEL ISSUES TO END USE WILL BE VERIFIED BY EITHER A METERED DEVICE OR A MEASURED CONTAINER (E.G., INTO A 5-GALLON CONTAINER).

(2) AT THE ISSUING ACTIVITY, A COPY OF THE ISSUE/RECEIPT INVOICE WILL BE MAINTAINED TO SUPPORT THE ISSUE TRANSACTION IN THE CUSTODY RECORD.

D. SECURITY/QUALITY CONTROL. THE REQUIREMENTS OF PARAGRAPH 2D, PRECEDING, ALSO APPLY TO CONSUMER LEVEL ACTIVITIES STORING FUEL EXCEPT FOR SUBPARAGRAPHS 2D(3) AND (9).

E. MAINTENANCE, RETENTION, AND DISPOSAL OF FUEL CUSTODY FILES AND RECORDS.

(1) A VIABLE AUDIT TRAIL MUST BE ESTABLISHED TO TRACK THE TRANSACTION HISTORY OF RECEIPTS, ISSUES, AND GAIN/LOSS STATEMENTS FOR EACH FUEL DISPENSING POINT.

(2) FUEL CUSTODY RECORDS WILL BE RETAINED FOR A MINIMUM PERIOD OF 2 YEARS AS REQUIRED BY THE CURRENT EDITION OF OPNAVINST 4020.25.

F. INVENTORIES/VOLUME CORRECTION

(1) THE REQUIREMENTS OF PARAGRAPHS 2F AND 2G, PRECEDING, ALSO APPLY TO CONSUMER LEVEL ACTIVITIES STORING FUEL IN TANKS GREATER THAN A 50-GALLON CAPACITY."

4. SUMMARY OF CHANGE: PUBLISHES SEPARATE PROCEDURES FOR CONSUMER LEVEL ACTIVITIES TO CONTROL AND ACCOUNT FOR POL PRODUCTS STORED AT THIS LEVEL.

BT

Facil

- Br

- Sh

Mr Wooten

27 Aug 1986

- Briefed LG this date on issues.
- Informed him of current actions, i.e. consent order
- Need to press on with corrective action, i.e. new Base Order.
- Please discuss soonest personnel requirements.

File: Haz Waste

T.J. Dalzell

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

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.

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Allan E. Antley

Allan E. Antley, Chief
Waste Compliance Section
Residuals Management Branch
Waste Management Division

Enclosure

cc: William Meyer, NCDHS

Mr Wooten

27 Aug 1986

- Briefed LG this date on issues.
- Informed him of current actions, i.e. consent order
- Need to press on with corrective action, i.e. new Base Order.
- Please discuss soonest personnel requirements.

T.J. Dalzell

File: Hq Waste

JLW

Facilities -

- Brief phase.

- Should I be positive? - notice of violation
consent order
compliance order

Done 27 Aug 86

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 commply 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

8/4/86
Date

14. Concurrence

Beverly J. Foster for
John C. Lank, Jr., Chief
East Unit, Waste Compliance Section
8/4/86

Allan E. Antley
Allan E. Antley, Chief
Waste Compliance Section

Attachments

TSDF INSPECTION FORM - PART 264

USMC Camp Lejeune NC6170022580 Onslow
Name of Site EPA I.D. County

Jacksonville 6-26-86 David J. Elliott
Location Inspection Date Signature of Inspector(s)

Julian Woolard
Compliance Date Signature of Facility Contact

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 authorities
    - ___ 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

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SOLID & HAZARDOUS WASTE

Comment: not all positions listed with job description, Plan needs revising

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) ? ✓
   - ___ 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) ✓

NEEDS more Detail explanations

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 (264.114)
   - ___ equipment disposal/decontamination

25. Post-Closure Plan; Amendment of Plan (264.118) NA
   - ___ written (a)
   - ___ amendment/modification (b)(c)

SUBPART H - FINANCIAL REQUIREMENTS N/A Federal Facility

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 — 6-26-86

Name of Site — EPA I.D. — Inspection Date

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) (a)(4)
   - ___ 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 Waste (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 (crates) approximately same size as drums were stacked three high

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GENERATOR INSPECTION FORM - PART 262

USMC Camp Lejeune NC[redacted]6170022580 Onslow

Name of Site — EPA I.D. — County

Jacksonville 6-26-86 David G. Ellison

Location — Inspection Date — Signature of Inspector(s)

Julian Woolen

Compliance Date — Signature of Facility Contact

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) ✓

DHS FORM 3010 (Rev. 9-83)
SOLID & HAZARDOUS WASTE

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 manifest at permitted storage list

- TMO signs Safety Kleen manifest as generator, personnel have no formal training conducted recently, no training plan, no contingency plan, one individual signing the manifest had received no training

- Building 909 - weekly inspections have not been performed there is no backup inspector (262.34 a(1))

- No accumulation dates on hazardous waste label on drums of eletrolyte solution drained from batteries. 262 (a)(2)+(3)

- Batteries drained are stored inproper, batteries stored upside down on pallets

- All generating sites — inadequate personnel training, no personnel training plan and no contingency plan this violates 262.34 (a)(4)

CONTAINER/TANK INSPECTION FORM - PART 265

USMC Camp Lejeune | NC 6170022580 | 6-26-86

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 Ignitable Or Reactive Waste (265.198)
   - ___ properly stored (a)(1)(2)(3)
   - ___ buffer requirements (b)

6. Special Requirements For Incompatible Wastes (265.199)
   - ___ properly stored (a)
   - ___ tank washed (b)

REMARKS: _____

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SOLID & HAZARDOUS WASTE

TRANSPORTER INSPECTION FORM - PART 263

USMC Camp Lejeune NC6170022580 Onslow

Name of Site EPA I.D. County

Jacksonville 6-26-86 David L. Elliott

Location Inspection Date Signature of Inspector(s)

Compliance Signature of Facility Contact

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.

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SOLID & HAZARDOUS WASTE

SPECIFIC VIOLATIONS OF HW REGULATIONS 14AUG86 EPA REPORT	PROPOSED ACTIONS TO BE TAKEN TO PROVIDE COMPLIANCE WITH REGULATIONS	BASE PROPOSAL FOR DATE COMPLIANCE WILL BE ACHIEVED
1. Hazardous Waste (HW) manifest 40CFR 262.21 Failure to enter generator ID # on 28Feb86 manifest	Corrective action has been taken. Two offices have responsibility for HW manifest preparation at Camp Lejeune, the Traffic Management Office (TMO) and the Defense Reutilization and Marketing Office (DRMO). Both TMO and DRMO have been requested to take action to prevent recurrence of the violations. Base environmental personnel will monitor compliance monthly.	1 October 1986
2. Discrepancies at HW Generation Sites 40CFR 262.34(A)(1) Subpart I weekly inspections 40CFR 262.34(a)(2) No Accumulation Date 40CFR 262.34(A)(3) Improper Container labeling 40CFR 262.34(A)(4) personnel HW Training 40CFR 262.34(A)(4) maintenance and operation of facility	a. A Base message will be published emphasizing proper procedures for handling/disposal of used batteries/electrolyte. b. Special HW Officers will be appointed at the Batallion/Separate company level (or equivalent) to enforce regulations regarding these discrepancies, specifically HW Training. c. A revised Base instruction will be published which strengthens responsibilities for HW management and formalizes/improves HW Training plan/program. d. Work sites routinely generating HW will be identified and will be inspected once by Base environmental staff. Annual HW inspections by Base environmental staff will be required. e. Weekly inspections of each HW storage area will be conducted by generator per HW regulations of stated SPA	90 days from date of consent order

SPECIFIC VIOLATIONS OF HW REGULATIONS 14AUG86 EPA REPORT	PROPOSED ACTIONS TO BE TAKEN TO PROVIDE COMPLIANCE WITH REGULATIONS	BASE PROPOSAL FOR DATE COMPLIANCE WILL BE ACHIEVED
3. CFR 262.34(a)(4) 40CFR 265 Subpart D spill prevention and spill contingency plan at HW generation and accumulation sites.	a. Although Camp Lejeune does not concur with EPA findings that No spill contingency plans were provided at HW generation sites, The following action will be taken to improve spill prevention and response at the work sites: (1) Each Site will be required to have a written procedure which clarifies personnel's responsibilities for implementing BO 11090.1B which is Base Contingency Plan. (2) Base Fire Department Inspectors will place special emphasis on this matter and will check each HW generation site for compliance with this requirement on a Routine Schedule b. Provide a copy of the 14August 1986 EPA report to ENSAFE, a private contractor who is presently revising the Base HW Spill Control and Countermeasures Plan. The contractor will be requested to address EPA findings in their project.	90 days from date of Consent Order

SPECIFIC VIOLATIONS OF HW REGULATIONS 14AUG86 EPA REPORT	PROPOSED ACTIONS TO BE TAKEN TO PROVIDE COMPLIANCE WITH REGULATIONS	BASE PROPOSAL FOR DATE COMPLIANCE WILL BE ACHIEVED
4. 40CFR 262.42(a) + (b) Exception reporting	Defense Reutilization and Marketing Office (DRMO) and Base Traffic Management Officer (TMO) have been advised to closely monitor all HW shipments to ensure compliance. Natural Resources and Environmental Affairs Director will perform monthly compliance checks of DRMO + TMO records. The six Safety Kleen manifests cited in EPA report were apparently sent to wrong local address. These have been located.	1 October 1986
5. Discrepancies at Long-Term HW storage facilities: Permit Condition Inspection Log	a. North Carolina Solid and Hazardous waste management Branch will be provided written Notification of inspection log and name changes	1 October 1986
Permit condition Name changes	b. DRMO operator has been advised not to stack containers over equivalent to two barrels high. NREAD will inspect compliance monthly.	1 October 1986
permit condition - container Storage	c. DRMO has been requested to review HW duty assignments and take action to update position descriptions and training records to reflect current situation.	90 days from date of Consent Order
40CFR 264.52 + 264.56 Contingency Plan	d. Contingency Plan will be revised (See 3 b).	90 days from date

SPECIFIC VIOLATIONS OF HW REGULATIONS 14AUG86 EPA REPORT	PROPOSED ACTIONS TO BE TAKEN TO PROVIDE COMPLIANCE WITH REGULATIONS	BASE PROPOSAL FOR DATE COMPLIANCE WILL BE ACHIEVED

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SPECIFIC VIOLATIONS OF HW REGULATIONS 14AUG86 EPA REPORT	PROPOSED ACTIONS TO BE TAKEN TO PROVIDE COMPLIANCE WITH REGULATIONS	BASE PROPOSAL FOR DATE COMPLIANCE WILL BE ACHIEVED

6240
NREAD

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

To: Assistant Chief of Staff, Facilities

Subj: ENVIRONMENTAL PROTECTION AGENCY (EPA) ON SITE INSPECTION OF 26 AND 27 JUNE 1986

Ref: (a) BO 6240.5
(b) FONECON between Mr. Jerry Rhodes, DHS, and Mr. Danny Sharpe, NREAD of 19 Aug 86

Encl: (1) Proposed BO 6240.5A
(2) AC/S, MCB ltr 6240/NREAD of 25 APR 86
(3) EPA ltr (ALLAN E. ANTLEY) 4WD-RM of 14 Aug 86

1. The purpose of this memo is to provide NREAD comments on the subject inspection. Reference (a) established the activity Hazardous Waste (HW) Disposal Program. Enclosure (1) provides proposed revision of the HW disposal program. Enclosure (2) identified action initiated by NREAD to upgrade existing HW Training Program. Enclosure (3) provides EPA written report on the subject inspection. In NREAD's opinion, enclosure (3) accurately reflects the outbrief provided by EPA during the subject inspection. During reference (b), the State Representative indicated that he was going to recommend a consent order. The State Representative has requested a telephonic notification by 26 Aug 1986 as to proposed corrective action and deadlines. In reviewing the EPA comments and NREAD responses below, it should be kept in mind that the military shops visited during the subject inspection have historically done one of the better jobs of personnel training and record keeping within military organizations within Camp Lejeune.

2. EPA 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 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 contract handles the 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."

NREAD Response: Concur. The following comments are provided:

(1) The priority that organizational commanders place on proper management of HW is critical to achieving compliance with HW regulations. The proposed revision to reference (a) contained in the enclosure sets up primary and alternate HW management officers at the Battalion, Marine Aircraft Group and separate Company level. When trained, these collateral duty officers should be able to coordinate implementation of the requirements of reference (a). The proposed revision also provides for written HW SOP's and tasks all organizations to develop and implement internal controls including disciplinary action.

(2) The management of waste oil continues to be a serious problem. The ongoing HW management/used oil study being conducted for the base through LANTDIV contract no. N62470-85-B-7979 by Environ-

mental and Safety Designs, Inc. (ENSAFE) has produced draft recommendations in this area. The most important recommendation is that a qualified used oil administrator be appointed within the Utilities Branch of Base Maintenance to manage all aspects of used oil collection and maintenance of oil pollution abatement facilities. NREAD has made similar recommendations to Base Maintenance over the past two years. The Roads and Grounds Section of Maintenance and Repair Branch, currently has this responsibility. Despite what appears to be a very conscientious effort on the part of Roads and Grounds to carry out this important function, program management has not been satisfactory. It is NREAD's opinion that the Utilities Branch mission and staff expertise ensures capability to properly manage this program. Supervision of this program appears to be a full time job for a person with experience in industrial wastewater/ waste collection, pretreatment and disposal and ability to interpret and comply with the many regulations applicable to the program. NREAD recommends immediate action in regard to the ENSAFE recommendations.

(3) It is recommended that a HW training committee chaired by the Employee Development Director, CPD, with major command Hazardous Material Disposal Coordinators as members be established to coordinate HW Training. Enclosure (2) pertains.

3. <u>EPA Recommendations</u>

"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:

(1) - 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.

(2) - 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.

(3) - 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 CRF 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."

NREAD Response: Concur with the following comments:

(1) Used oil administrator should be appointed immediately (see 2b above) with authority and resources to manage program. This manager, in close coordination with NREAD, should develop a used oil segregation program to include publishing base order; budgeting/procurement required to provide satisfactory equipment and facilities; and establishment of an enforcement strategy.

(2) Regarding the contingency plan, it is recommended that ENSAFE be provided a copy of EPA letter and requested to ensure that their HM spill SPCC plan addresses spill contingency issues.

4. EPA Comment: 40 CFR 262.21 - Manifest (Required Information) On the February 28, 1986, manifest, no generator ID number was used as required.

NREAD Response: Concur. DRMO has corrected discrepancy. NREAD monthly inspections will check continued compliance.

5. EPA Comment: 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.

NREAD Response: Partially Concur. Inspections were not performed due to the absence of key personnel. There is a question whether comments on electrolyte are justified. NREAD's opinion is that EPA interpretation of requirements for handling batteries/electrolytre differ from local understanding of guidance provided previously by State regulatory personnel. However, subsequent study of problem, including consultation with ENSAFE, indicates that EPA interpretation is appropriate. A message will be issued to revise guidance for battery/electrolytre disposal as soon as procedures acceptable to DRMO can be developed. DRMO is in process of consulting their Regional Headquarters. It should be noted that ENSAFE is recommending turn-in of electrolyte to DRMO vice local neutralization and discharge to sanitary sewer. See 6. and 8 below. NREAD would strenuously nonconcur with any subsequent proposal by state to fine the base for past battery acid handling relative to situations discussed above at building 909.

6. EPA Comment:

a. 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."

b. 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.

NREAD Response: Partially Concur. Base had interpeted previous state guidance to indicate that electrolyte did not require labeling/dating since electrolyte was being neutralized and discharged to a permitted waste treatment plant. In that, the military units were in compliance with local guidance, they should not be gigged for these specific discrepancies. Message discussed in 5b above will address this item. See no reason to rebutt EPA comment.

7. EPA Comment: 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.

NREAD Response: Partially Concur. Proper wording would have been that "generators inspected had inadequate training plans." Comments on need of back-up personnel are very accurate. Inadequacy of HW training is addressed in proposed revision of reference (a) con-

tained in enclosure (1). TMO is establishing internal controls to ensure that only properly trained personnel are authorized to sign HW manifests.

8. EPA Comments: Regarding Subparts C and D in 40 CFR Part 265 the following discrepancies were noted:

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 constitutents 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 possible has at building 909 where the soil is discolored.

NREAD Response: Concur. If we infact agree with EPA interpretations of electrolyte being a HW (see 5 and 6 above), then turning the batteries upside down is not advisable. DRMO has been contacted and is expected to advise shortly relative to modifying regulations. Modification would provide for placing drained batteries upright and covering with a sheet of plywood prior to banding to pallet vice current practice of laying them on side or turning them upside down. Costs would be minimal and would be offset by improved hanlding of characteristics of this method of packaging.

9. EPA Comments: 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.

NREAD Response: Nonconcur. The lead inspector was shown copy of BO 11090.3, Oil Pollution Prevention and Abatement Oil

and Other Hazardous Substances Spill Contingency Plan. It is NREAD's opinion that during the subject inspection, facility personnel displayed working knowledge of their responsibility to report spills immediately. In NREAD's opinion the actual discrepancy is the lack of a site specific contingency plan to guide steps to be taken by facility personnel until Fire Department arrived on the scene. Also, site specific responsibilities for spill prevention are inadequate. From a management point of view, the ENSAFE Study and the proposed revision of reference (a) contained in enclosure (1) addressed this issued adequately. Enclosure (1) requires a written SOP at each generation/storage site and by strengthening training requirements. Additionally, enclosure (1) requires Commanding Officers to place emphasis on internal controls required to implement the revised Order when published.

10. EPA Comment: 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 or 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.

EPA Comment: 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 hadnwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the transporter.

NREAD Response: Concur. Corrective action has been taken.

TMO representative has obtained the above manifests which were apparently mailed to wrong local address. NREAD and TMO are cooperating to develop internal controls to ensure timely exception reporting. It is extremely important that Base Contracting ensure all service contracts require contractor to have each manifest/shipment approved or signed by TMO at the time HW leaves the installation. The Safety Kleen Services concept is placing significant burden on TMO. Proposed revision of reference (a) transfers responsibility for providing Base Hazardous Material Disposal Coordiantor from TMO to NREAD. This will allow TMO concentrate on HW transportation. However, this does increase NREAD workload and must be addressed.

11. The following specifically addresses operation of the base long term HW storage facility and associate DRMO functions:

a. EPA Comments: 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.

NREAD Response: Concur. Should be done in conjunction with d below.

b. EPA Comments; 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.

NREA Response: Concur. DRMO needs to involve more of their people in HW management to increase flexibility in dealing with absences of key personnel (i.e., Mr. Eggers) and to ensure that HW minimization goals and objectives are promoted.

c. EPA Comment: 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.

NREAD Response: Concur. Not sure that the above actually violates intent of permit. However, until such time as storage capability in facility becomes a problem, there is no reason to make an issue of this. No trends in volumes have been observed which would indicate a problem in this area.

d. EPA Comment: 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.

NREAD Response. Concur. Should be done in cooperation with a(1) above.

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

BO 6240.5A
NREAD/st

BASE ORDER 6240.5A

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

Subj: Hazardous Material Disposal Program

Ref: (a) Resource Conservation and Recovery Act (Pub No. 94-580) (42 USC 6901-6987) (NOTAL)
(b) EPA Regulations contained in Code of Federal Regulations, Title: 40 Parts 260-265 (NOTAL)
(c) DOT Regulations contained in Code of Federal Regulations, Tital: 49 Parts 100-179 (NOTAL)
(d) BO 11090.1B
(e) BO 11320.1G

Encl: (1) Procedures for collection, storage and turn in of Hazardous Material (HM) and Hazardous Waste (HW) for disposal
(2) Responsibilities for Hazardous Material (HM)/Hazardous Waste Disposal
(3) Hazardous Waste Training Requirements and Guidelines

1. Purpose. To revise responsibilities, procedures and guidance for hazardous material (HM) and hazardous waste (HW) disposal and related environmental protection for the Camp Lejeune and Marine Corps Air Station, New River complex.

2. Cancellation. B) 6240.5

3. Background

A. Congress and the state legislatures have responded to the threats to human life and the environment caused by mismanagement and illegal spilling and dumping of toxic substances by enacting laws which not only attempt to avert future threats but which impose civil and criminal penalties. In enacting many of these environmental laws, Congress waived federal supremacy, requiring federal agencies including the Marine Corps, to comply with federal, state and local environmental laws. The same Congressional action also stripped federal officers and employees of their official immunity for violation of federal, state and local pollution control and environmental laws. Federal officers and employees now face the possibility that they may be personally liable for civil and criminal penalties and fines as well as imprisonment.

B. The Environmental Protection Agency (EPA) has authorized the State of North Carolina to enforce the requirements of references (a) and (b) through a state HW regulatory program. The Solid and Hazardous Waste Management Branch, Division of Health Services (DHS), is the primary enforcing agency within North Carolina. DHS enforcement personnel have authority to investigate HW spills and perform routine inspections of work sites where HW are ahndled and stored. These investigations and inspections can result in citations being issued to supervisors and/or personnel at the work site for civil and/or criminal violations of HW regulations.

C. Organizational commanders subject to this Order should be aware that four basic management issues must be addressed if HW are to be safely and efficiently handled and legal requirements satisfied. These are: use of proper type containers in good condition; clear, accurate marking and labeling of containers; availability of adequate supplies, equipment and storage facilities; and most important, proper HW training for all personnel routinely involved in HW management. Enclosures (1), (2) and (3) provide revised responsibilities, guidelines and procedures for HW management and related personnel training. HW training for military personnel is a major ongoing problem due to personnel turn over rates. see Note 1 below

D. Major commands have established two collateral duty positions to coordinate and to assist with the implementation of the subject program. These are titled Hazardous Material Disposal Coordinator (HMDC) and Hazardous Material Disposal Officer (HMDO).

Note 1 delete shaded Area and insert: Use of containers which both meet requirements of reference (c) and are in good condition.

Encl (1)
rev

HMDC AND HMDO responsibilities are outlined in enclosure (2). The appointment and training of qualified primary and alternate HMDCs and HMDOs Are essential to implementation of the complex requirements of the subject program.

4. Action.

A. Organizational commanders shall on a continuing basis take action required to implement the following HW management goals and objectives:

(1) HW operations will be supervised by properly trained personnel who have access to equipment and supplies required for handling HW safely and dealing with potential emergencies.

(2) HW training plans will be developed and implemented for all HW managers and handlers, and appropriate records maintained to document that proper training is being provided to personnel.

(3) OIC/NCOIC's will ensure that HW facilities are inspected weekly and timely corrective action is taken and properly documented per this Order and related instructions of HMDO/HMDC.

(4) OIC/NCOIC's will prepare a written HW management SOP in cooperation with HMDO for each facility where HW are routinely handled and stored. SOP will be readily available at facility.

(5) A system of internal controls will be implemented continuously in a manner which ensures that violations of this Order are identified and proper level of disciplinary action is taken to discourage recurring violations.

B. Major commands will take action requried to limit HW generation to the fewest locations practical, to identify HW handling and storage equipment and facilities requirements and to develop and implement a system of internal controls which provides satisfactory compliance with the requirements of this Order and related regulatory requirements. As a minimum the following action will be taken:

(1) Appoint a primary and alternate HMDC with authority and resources to implement duties outlined in enclosure (2).

(2) Maintain at all times a listing/directory of facilities where HW are handled and stored And ensure timely submittal of waste identification documents per enclosure (1).

(3) Require OIC/NCOIC's ~~in charge~~ of HW handling and storage facilities to develop and implement a written HW SOP for each facility per enclosures (1) and (3). The SOP will be readily available to personnel routinely handling HW or dealing with HW and related emergency response.

(4) Require Commanding Officers of each Marine Air Group, Regiment, Battalion and separate Company (or equivalent) to appoint a HMDO with the authority and resources to carry out the duties outlined in enclosure (2).

(5) Establish and promote HW management goals and objectives for supply and maintenance functions which promote the minimization of the volume and toxicity of HW generation.

5. Concurrence. This Order has been coordinated and concurred in by the Commanding Generals, II Marine Amphibious Force, 2d Marine Division, FMF, 2d Force Service Support Group (Rein), FMF, 6th Marine Amphibious Brigade, FMF, and the Commanding Officers, Marine Corps Air Station, New River, Naval Hospital and the Naval Dental Clinic.

M. C. HARRINGTON
Chief of Staff

DISTRIBUTION: A

PROCEDURES FOR COLLECTION, STORAGE AND TURN-IN OF HAZARDOUS WASTE (HW) AND HAZARDOUS MATERIAL (HM) FOR RECYCLING OR DISPOSAL

1. Hazardous Waste Management Standard Operating Procedures (HWMSOP). Each organization routinely generating or handling HW or disposing of HM will develop desk top procedures to be followed. As a minimum, the HWMSOP will prove the following:

a. Name and telephone number of cognizant Hazardous Material Disposal Officer (HMDO) and Hazardous Material Disposal Coordinator (HMDC).

b. Copy of BO 6240.5_ and 11090.1_.

c. Name, title, duties and HW training records for each employee per enclosure (3).

d. Waste Identification Document (WID) for each HW generated or handled completed per attachment (A) of this enclosure.

e. Procedures and responsibilities for dealing with HW/HM spills and related emergencies.

f. Copies of weekly inspections of HW storage areas/containers.

g. Guidance provided by HMDO/HMDC's to implement HW/HM disposal program.

h. Location sketch for each HW storage area.

2. HM/HW Collection and Storage Procedures/Requirements.

a. Possession of a properly completed and signed WID constitutes authorization to generate, handle or store a HW. Failure to submit a WID to HMDC within 30 days of date HW first generated or handled or 60 days of the date of this Order (whichever is later) will be considered a violation of this Order. HMDC's are responsible for monitoring and enforcement of this requirement.

b. Only Department of Transportation (DOT) approved containers labeled per attachment (B) will be used for storage of HW awaiting disposal. HMDO's are responsible for enforcing this standard.

c. All personnel routinely handling or responsible for HW management must be properly trained per this Order and references (a) and (b). OIC's are responsible for maintaining training records for personnel within their cognizance. HMDC's are responsible for enforcement of this requirement.

d. All HW containers and storage areas will be inspected weekly using format provided by cognizant HMDC/HMDO. A written record of corrective action will be maintained per HMDO/HMDC guidance. Director, NREAD, MCB will assist HMDC/HMDO develop guidelines.

e. Spills of HW/HM will be promptly reported to the Base Fire Department at the Emergency Telephone Number 451-3333. OIC's are responsible for maintaining absorbents, safety equipment, and other supplies and equipment required for dealing with routine spills. HWMSOP's will give specific guidance in this area.

f. A Form DD 1348-1 will be completed and submitted to the cognizant HMDO not later than 45 days after the "accumulation start date" on the HW label placed on the container per attachment (B).

g. HMDC will be notified by telephone, confirmed in writing, of anytime DRMO has not accepted accountability of a HW within 75 days after the "accumulation start date" on any HW container.

Enclosure (1)

3. Hazardous Material (HM) and Hazardous Waste (HW) Turn-in Procedures. The following steps will be taken to initiate final disposal of HM/HW. At any time that a major problem or controversy arises, the organization attempting to turn-in the item will immediately notify the responsible Hazardous Material Disposal Coordinator (HMDC). The HMDC will be responsible for coordinating efforts to resolve the problem/controversy and will utilize the assistance of the Director, Natural Resources and Environmental Affairs Division (NREAD), Facilities Department, Marine Corps Base, telephone extension 2083, 2195. Unresolved problems/controversies will be referred to the Assistant Chief of Staff, Facilities, Marine Corps Base.

STEP 1. The Officer in Charge (OIC) of the organization having physical custody of HM/HW is responsible for turn-in of HM/HW unless otherwise specified by HMDC. OIC will properly containerize the HM/HW and submit a Form DD 1348-1 to the cognizant Hazardous Material Disposal Officer (HMDO) per instructions in organization's HWMSOP. Questions not addressed by HWMSOP will be directed to HMDO.

STEP 2. The HMDO will physically inspect the HM/HW and determine if the Form DD 1348-1 is properly completed and the HM/HW is properly packaged. The HMDO will coordinate correction of any problems. Unresolved problems will be referred to cognizant HMDC for resolution. Once problem's resolved, HMDO will forward (preferably hand deliver) the Form DD 1348-1 to the Defense Reutilization and Marketing Office (DRMO) Headquarters, Bldg 906.

STEP 3. The DRMO will inspect the HM/HW if necessary, and will determine if DRMO is accountable (i.e., responsible) for disposal of the HM/HW. If DRMO determines that the local activity, not DRMO, has responsibility for disposal of the HM/HW, the DRMO will so notify the cognizant HMDC in writing with a copy to the NREAD. The HMDC and NREAD will cooperate in developing case specific procedures for disposal of the item. AC/S Logistics, MCB, will provide contracting support.

STEP 4. If DRMO determines that DRMO is accountable for HM/HW, DRMO will determine where the HM/HW will be stored awaiting disposal. HW must be stored at the DRMO facility at TP-451 complex, unless otherwise approved by the AC/S, Facilities, MCB. DRMO will submit a request to the Traffic Management Office (TMO), MCB, to arrange transportation of the HM/HW to DMRO designated facility.

STEP 5. TMO in cooperation with HMDO will determine if generating organization can safely, leg~~ally~~ transport the item to DRMO designated facility. TMO must dir~~ectly~~ supervise transportation of HW. Whenever practical, Command turning in a HM will provide transportation. TMO and HMDO will cooperate in promoting efficient, safe transportation. Spills or other emergencies will be promptly reported to the Base Fire Department at 451-3333. Drivers will be provided written spill prevention and response guidance.

STEP 6. When the HM/HW arrives at storage facility, DRMO will inspect prior to unloading. DMRO is authorized to refuse the HM/HW if any significant discrepancies exist. DRMO will immediately notify cognizant HMDC and NREAD of DRMO's refusal to accept the HM/HW. The transporting vehicle will be secured and will not be moved outside the immediate vicinity of DRMO facility except for emergency situations involving risk to public safety or to property. DRMO, HMDC and NREAD will cooperate in making an immediate decision on corrective action. If problems cannot be promptly resolved the HM/HW will be returned to the generating organizations facilities.

STEP 7. When DRMO accepts physical custody of the HM/HW, turn-in is complete.

ENCLOSURE (1)

4. Standards for Hazardous Waste Satellite Accumulation Areas

a. General. Satellite accumulation area (SAA) is a term developed by the Environmental Protection Agency (EPA) to designate a work site which may generate and accumulate hazardous waste (HW) without regard to the 90 day storage limit normally applicable to non-permitted HW storage facilities. The purpose of setting up this special category of HW storage is to assist those generators who generate HW at a very slow rate, example, one container per every 6 months. Previously, these generators were requried to dispose of partially filled containers, a very inefficient and often expensive practice. Any work site routinely generating a HW at a rate of less than one full container per 45 day interval may benefit from being designated as a SAA. The decision to designate a work site as a SAA will be made by the cognizant Hazardous Material Disposal Coordinator (HMDC). The HMDC will develop the proposal and submit to the Director, Natural Resources and Environmental Affairs Division (NREAD), MCB, for concurrence and technical review. The HMDC will ensure that SAA requirements are incorporated into the HW SOP for the generating site.

b. SAA Requirements.

(1) SAA must meet applicable fire prevention regulations enforced by the Base Fire Protection Division.

(2) All containers must meet Department of Transportation (DOT) regulations for the specific type of materials stored in them.

(3) All containers will have a hazardous waste label attached per BO 6240.5. The "accumulation start date" will be left blank until the date container is full, at which time the current date will be entered. The container must be physically moved to the designated storage area shown in the HW SOP.

(4) A sign shall be installed at the SAA which provides the following or equivalent:

(a) IN CASE OF EMERGENCY NOTIFY BASE FIRE DISPATCHER AT 451-3333 and HAZARDOUS MATERIAL DISPOSAL OFFICER AT _____.

(b) UNAUTHORIZED PERSONNEL KEEP OUT

(c) NO SMOKING

(d) SPILL CONTINGENCY PLAN IS ATTACHED BELOW:

(5) The spill contingency plan should specify by name and title persons responsible for all key phases of HW handling and emergency response.

(6) Adequate supplies and equipment should be on hand at all times to ensure safe, timely handling of the HW and related spills and leaks.

(7) An informal inspection of the SAA will be conducted during each normal work day. Deficiencies will be promptly corrected. A log of discrepancies discovered and corrective action taken will be maintained in any format designated by OIC.

(8) Total volume of HW at SAA may not exceed 55 gallons. Filled containers must, by EPA regulations, be removed from SAA within 3 days of the date filled.

ENCLOSURE (1)

TO BE COMPLETED BY THE HMDC AND COPIES SENT TO THE HMDO, DRMO, AND DIRECTOR, NREAD

6. WASTE CHARACTERIZATION: DATE COMPLETED _____ LAB REPORT # _____

7. WASTE CLASSIFICATION: _____ Hazardous ____ Nonhazardous

8. EPA WASTE NUMBER(S): _____

9. REASON FOR HAZARD CLASSIFICATION: _____

10. HANDLING INSTRUCTIONS: _____

11. DTID 1348-1 REQUIRED: ___ Yes ___ No

12. CONTAINER AND LABELING REQUIREMENTS:

A. DOT/DOD CONTAINER TYPE: _____

B. DOT PROPER SHIPPING NAME: _____

C. DOT HAZARD CLASS: _____

D. UN/NA NUMBER: _____

E. ADDITIONAL REQUIREMENTS: (FOR DRMO) _____

13. SPECIAL PRECAUTIONS AND/OR INSTRUCTIONS: _____

14. _____

HMDC Signature | Code | Date

Appendix A to
ENCLOSURE (1)

BO 6240.5A

WASTE INFORMATION DOCUMENT (WID)

DATE _____

WID # _____

1. GENERATING WORK CENTER INFORMATION

_____

Shop Contact Command Building Phone Ext.

2. WASTE IDENTIFICATION

A. WASTE NAME: Common _____ Chemical(s) _____

_____

B. PHYSICAL FORM: (CHECK) ___ Liquid ___ Solid ___ Sludge ___ Other (Specify)__

_____

C. MANUFACTURER: _____ D. NATIONAL STOCK NUMBER: _____

E. CONTAINER: (TYPE AND SIZE) _____

F. GENERATION RATE: (e.g., gal/day, lbs/day) _____

G. FREQUENCY OF GENERATION _____

H. EXPECTED ANNUAL GENERATION: (GALS, LBS) _____

I. DESCRIBE WASTE GENERATION PROCESS: _____

_____

_____

_____

J. HAS WASTE BEEN MIXED WITH ANY OTHER MATERIAL? ___ Yes ___ No If yes, specify _____

_____

3. REASON FOR DISPOSAL: (CHECK)

____ Exceeded shelf life ____ Served intended purpose ____Unused ___Other (specify) _____

4. CERTIFICATION: I certify that the above named materials are the only compounds in the waste containers listed above and have not been mixed with any other materials

_____

HMDO Signature DATE

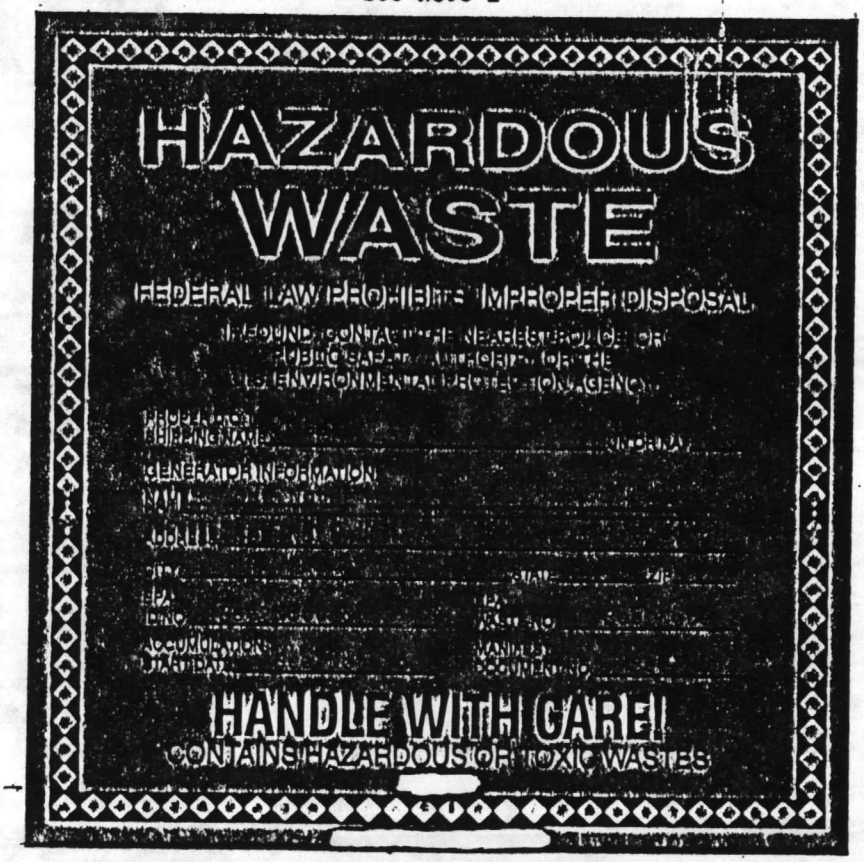
5. REQUEST FOR WASTE CHARACTERIZATION BY NREAD: I am unable to properly classify the above waste. NREAD assistance is requested. Cost of Laboratory Analysis should be charged to the following Cost Account Code. _____

_____

HMDC Signature DATE

Appendix A to ENCLOSURE (1)

See Note 1



Note 1: The above label or equivalent will be placed on all hazardous waste (HW) containers prior to use for storage of HW. Damaged labels will be immediately replaced, using same information as on original label. If original label illegible, contact your Hazardous Material Disposal Officer for guidance.

Note 2: Obtain this information from your HW Standard Operating Procedure. If not available, contact your Hazardous Material Disposal Officer.

Note 3: Enter the name of the organization having physical custody of the HW at time label placed on the container, unless replacing a damaged label. See Note 1 above.

Note 4: Enter either "MCAS, New River, Jacksonville" for HW generated aboard or by organizations stationed aboard the Marine Corps Air Station, New River. Enter "Marine Corps Base, Camp Lejeune" for all other HW generated locally.

Note 5: Enter NC 8170022570 for all waste generated aboard or by organizations stationed aboard MCAS, New River. Enter NC 6170022580 for all other HW generated within the Camp Lejeune complex.

Note 6: Enter the date that HW first placed in the container unless the facility has written authorization from CG, MCB, Camp Lejeune to operate as a HW satellite accumulation area. In which case, follow instructions provided within the written authorization.

Note 7: Leave blank, will be completed by the Traffic Management Officer, Camp Lejeune.

Appendix B to
ENCLOSURE (1)

RESPONSIBILITIES FOR HAZARDOUS MATERIAL (HM)/HAZARDOUS WASTE (HW) DISPOSAL

1. Compliance with hazardous waste management and disposal regulations requires the cooperative effort of many functions within the Camp Lejeune complex. The following outlines the responsibilities of various officers and managers relative to hazardous waste management:

a. Hazardous Material Disposal Officer (HMDO) will:

(1) Provide assistance to HW generators and handlers in the preparation and timely submittal of HW turn-in documents per BO 6240.5.

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

(3) Keep OIC's and key personnel informed of any changes in regulations affecting HW activities within the HMDO's cognizance and ensure that HW standard operating procedures (SOP) are up to date and readily available for review by personnel involved in HW management.

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

(5) Develop and provide HW Training requirements to HMDC for personnel within the HMDO's cognizance.

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

(7) Conduct surveys required to identify HW generation and storage sites within the HMDO's cognizance and provide periodic updates as questioned to the HMDC.

b. Hazardous Material Disposal Coordinator (HMDC) will:

(1) Provide assistance to HMDO's in handling HW management problems. Serve as HMDO for organizations not having sufficient HW activity to justify appointment of a HMDO.

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

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

(4) Serve as command point of contact with Marine Corps Base Environmental personnel on matters dealing with worksite HW inspections by State and Federal agencies and implementation of this Order.

(5) Develop listings of HW generation and storage facilities.

(6) Develop and provide to the Base Civilian Personnel Division (CPD) the HW training requirements of the HMDC's command.

c. Assistant Chief of Staff, Facilities, Marine Corps Base will:

(1) Have overall responsibility for implementation of the subject program and maintaining compliance with requirements of references (a) and (b) and related local, state and federal regulations.

(2) Have overall responsibility for management of pollution abatement projects per latest revision of MCO P11000.8.

(3) Have overall responsibility for local implementation of Marine Corps programs to correct environmental discrepancies associated with past HM/HW disposal sites.

ENCLOSURE (2)

(4) Ensure that plans and specifications for new facilities provide adequate facilities and collateral equipment for the handling and storage of HM/HW.

d. Director, Natural Resources and Environmental Affairs Division will:

(1) Provide a staff specialist to serve as HMDC for Marine Corps Base.

(2) Provide a command point of contact with state and federal agencies on matters pertaining to the subject program.

(3) Monitor ongoing activities as required to identify, evaluate and provide up-channel reporting of environmental deficiencies related to the subject program.

(4) Coordinate day-to-day implementation of this Order and provide the following types of technical assistance:

(a) Laboratory support, if required, for HW identification.

(b) Training to HMDC's and HMDO's on state and federal environmental laws, regulations and procedures.

(c) Guidance on HM/HW SOP preparation.

(d) Guidance on HM/HW spill preventation, control, cleanup and related HW disposal.

(e) Coordination of HM/HW recycling/minimization program.

(f) Preparation and submission of reports to regulatory agencies required by references (a) and (b).

e. Base Maintenance Officer will:

(1) Collect and dispose of used POL's and oily wastes from collection tanks and other oil pollution abatement facilities in a manner consistent with this Order and references (a) and (b).

(2) Unless otherwise provided, operate and maintain industrial waste collection and pretreatment facilities associated with base sewage collection and treatment systems.

(3) Provide HM/HW spill response services in accordance with reference (d).

f. Base Fire Chief will:

(1) Provide HM/HW spill and related emergency services per references (d) and (e).

(2) Provide routine inspections of facilities where HM/HW are stored and handled, and report all discrepancies to cognizant HMDC. Elimination of the following hazards will be stressed:

(a) HM/HW stored in defective containers or containers which are not properly marked with the chmical name, NSN (if appropriate) and hazard label of the contents.

(b) Incompatible HM/HW are stored in a manner with significant potential threat of fire, explosion, or release of toxic fumes or gases due to chemical reaction during spills or leaks.

(c) HM/HW stored in a manner likely to result in a significant discharge to the environment.

g. Assistant Chief of Staff, Logistics will:

(1) Appoint an officer to serve as HMDO for the Logistics Department.

(2) Ensure that suppliers provide hazardous material safety data sheets for all HM procured through open purchase and will provide one copy to unit ordering HM and one copy to the Base Safety Manager.

(3) Develop and implement a program to provide, on a continuing and reimbursable basis, empty containers, labels, labeling equipment, absorbents, and other HM/HW handling supplies required to implement this Order and BO 11090.1B.

(4) Provide contracting services required to dispose of HM or HW for which DRMO is not accountable.

h. Traffic Management Officer, Logistics Department, Marine Corps Base will serve as principal agent for the Commanding General on matters pertaining to HM and HW transportation, and will be responsible for:

(1) Monitoring all HW transportation for compliance with requirements of references (a), (b) and (c) and related state and federal regulations.

(2) Providing transportation services and related record keeping required for implementation of this Order and which are not available from the Defense Reutilization and Marketing Officer (DRMO) or the organization generating the HM/HW.

i. Assistant Chief of Staff, Manpower will:

(1) Develop and implement a comprehensive HW personnel training plan meeting the requirements of reference (b) and related State of North Carolina regulations.

(2) Coordinate local implementation of the Marine Corps Hazardous Material Information System, per MCO 5100.2S and provide safety data and related technical support to HMDC's, HMDO's and other cognizant officials as required to implement this Order.

j. Officer is Charge, Preservation, Packaging and Packing (PP&P) Section, 2dFSSG will provide PP&P support (in accordance with established regulations and procedures) to HMDO's, HMDC's, TMO and DRMO required to accomplish the following:

(1) Identification of type of containers and labeling required for compliance with reference (a) and this Order.

(2) Packaging of HM/HW required for safe storage and transportation during disposal per this Order.

(3) HM transportation certification required for compliance with reference (c).

k. Defense Reutilization and Marketing Officer (DRMO) will:

(1) Operate the base Long-Term Hazardous Waste Storage Facility at the TP-451 complex in accordance with state permit issued under regulations promulgated under references (a) and (b).

(2) Provide HM amd HW disposal services to organizations within the Camp Lejeune/MCAS, New River complex in accordance with DOD regulations, references (a) and (b), and related state and federal regulations.

(3) Receive and process HM/HW turn-in documents in a timely manner and provide prompt notification to HMDO's of any document not satisfying applicable turn in criteria or which contain HM/HW for which DRMO is not accountable.

(4) Maintain records of DRMO HM/HW storage and disposal activity in a manner which provides information required for preparation and timely submittal of required reports to state and federal regulatory agenciea.

(5) Keeps HMDC's, HMDO's and other cognizant officers informed of changes in DRMO policies and procedures which affect local implementation of the subject program.

1. Commanding Officers of the following Base Commands/Organizations will designate a Primary and Alternate HMDO to carry out duties outlined in 1a and 1b above: Marine Corps Engineer School; Rifle Range Detachment; Field Medical Service Support School; Marine Corps Service Support School; Reserve Support Unit; Infantry Training School; Support Battalion; Headquarters Battalion; Assistant Chief of Staff, Morale, Welfare and Recreation; Assistant Chief of Staff, Logistics, and Base Maintenance Officer within their respective commands/organizations.

HAZARDOUS WASTE TRAINING REQUIREMENTS AND GUIDELINES

1. Hazardous waste (HW) training is a specific requirement of state and federal regulations promulgated under the Resource Conservation and Recovery Act (RCRA). A review of RCRA requirements and the actual HW activity aboard the Camp Lejeune/Marine Corps Air Station, New River complex indicates that a relatively small percentage of personnel require highly specialized HW training. Generally, the requirements for the remaining personnel involved in HW management are satisfied by routine on-the-job training and related safety and fire-prevention training readily available locally. Providing this training will have minor impact on organizational commanders, in that training required is directly job related. Attachment (A) Part II outlines the minimum HW training required for all categories of employees identified in Section 2 below.

2. For the purpose of these guidelines, only those personnel directly involved in HW handling, storage and disposal will be subject to the HW training documentation requirements of RCRA. A special HW training record, i.e., Attachment (A) Part I or II (or equivalent) will be developed for the following personnel:

a. All Hazardous Material Disposal Officers (HMDO), Hazardous Material Disposal Coordinators (HMDC), and alternate HMDO's and HMDC's.

b. Defense Reutilization and Marketing Officer (DRMO) and subordinate personnel routinely involved in HW handling, storage, turn-in and disposal.

c. Deputy Traffic Management Officer (TMO) and subordinate personnel involved in transportation and related certification of HW for shipment per DOT regulations.

d. Personnel assigned to work places meeting the definition of HW generators, HW accumulation areas or satellite HW accumulation areas and involved in one or more of the following:

(1) Collection and storage of HW.

(2) Inspection, and related follow-up, of HW handling/storage areas.

(3) Response to HW spills and related emergencies.

(4) Preparation and submittal of HW turn-in documents.

3. Other activity personnel providing professional and technical support to HW management include the following:

a. Fire Protection personnel

b. Safety specialists

c. Environmental staff

d. Industrial hygenists

Preparation of Attachment (A) Part I or II for these staff specialists and emergency personnel are not required. Duties and training provided to these individuals will consist of standard position descriptions and civilian personnel records.

4. Responsibility for providing specialized HW training required for compliance with RCRA is assigned to Assistant Chief of Staff, Manpower, Marine Corps Base. The following officials are responsible for notifying Assistant Chief of Staff, Manpower, or specialized training requirements of their subordinates and other personnel as shown.

a. The DRMO for self and subordinates

b. The TMO for subordinates

c. HMDC's for personnel shown in 2d above within HMDC's cognizance

ENCLOSURE (3)

d. Director, Natural Resources and Environmental Affairs Division (NREAD) for subordinates and primary and alternate HMDC's and HMDO's.

Organizational commanders are responsible for developing and implementing training plans and procedures to provide RCRA required training and maintain records outlined in Attachment (A). Organizational commanders will ensure that all new/newly assigned personnel are provided appropriate HW training and close supervision required to comply with RCRA and applicable personnel safety fire prevention and occupational health standards. Organizational commanders will notify HMDC's of HW training requirements. Notification will include names and addresses of persons to be trained and an accurate description of the training required. HMDC and Assistant Chief of Staff, Manpower representative will coordinate the scheduling and funding of specialized HW training.

5. Records of HW training must be maintained for each employee for three years after employee transferred or terminated, except as follows: if an employee is transferred to a HW related position within the Camp Lejeune/Marine Corps Air Station, New River complex, the HW training records will be transferred to the new organization. Responsibility for maintaining official files of HW training records are as follows:

a. HMDC's will maintain records of HW training for HMDC's, HMDO's and alternate HMDC's and HMDO's within their cognizance.

b. DRMO will maintain HW training records for all employees identified in paragraph 2b above.

c. TMO will maintain HW training records for all employees identified in paragraph 2c above.

d. HW training records for all employees identified in paragraphs 5(a)-5(c) will be maintained on Attachment (A) Part I. Records of personnel identified in paragraph 5(d) will be maintained on Attachment (A) Part II. HMDO will maintain HW training records for personnel identified in paragraph 5(d) above. A copy of training records for personnel identified in paragraph 5(d) above will be maintained in HWMSOP.

ENCLOSURE (3)

RECORD OF HAZARDOUS WASTE TRAINING

1. Employee Name: _____

2. Job Title/MOS: _____

3. Name of Organization: _____

4. Date this Record Established: _____

5. Description of HW Duty: _____

6. Description of HW Training Completed:

a. Date	b. Description of Training/Trainer	c. Signature and Date

Appendix A to
ENCLOSURE (3)

PART II

MINIMUM LEVELS AND RECORD KEEPING FOR HAZARDOUS WASTE MANAGEMENT ORIENTATION TRAINING

1. Name of Organization: _____

2. Description of Training: The personnel shown below were provided a minimum of one and one-half hours of on-the-job training covering the following:

a. Review of the types and characteristics of HM/HW handled.

b. Review of activity oil and hazardous substance spill preventation and contingency plan contained in BO 11090.1_.

c. Organizational procedures and policy for implementation of BO 6240.5.

d. Procedures to follow in protecting personal safety during HM/HW emergencies.

e. Review of the HW Standard Operating Procedure for the organization.

The training included question and answer session at the end of training.

3. Personnel Training Provided to:

Name of Trainee	Name of Trainer	Training Date	Trainer/Trainee Signatures

Appendix A to
ENCLOSURE (3)

6240
NREAD
Nov 10, 86

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 plan 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.

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

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.

SHEET ____ OF ____

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)

6240
NREAD
1 Dec 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 26 Nov 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.

PETER E. BLACK
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/463

PARTICIPANTS MARTIN/EGGARS DATE: 26 Nov 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		

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 EGGARS

ADDITIONAL COMMENTS, EXPLANATIONS, ETC: NONE

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

6240
LOG
19 Aug 1986

From: Assistant Chief of Staff, Logistics
To: Assistant Chief of Staff, Facilities

Subj: HAZARDOUS MATERIAL DISPOSAL PROGRAM

Ref: (a) Yr ltr 6240 NREAD dtd 15 Jul 1986

1. As requested by the reference, the primary hazardous material disposal officer for the Logistics Department is the Supply Support/Maintenance Management officer. The current incumbent is Captain A. G. Owens and his telephone number is 2507/2508.

W. Z. DEMENT
By direction

Copy to:
SupSptO/MMO

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

5721
LOG
15 Aug 1986

From: Assistant Chief of Staff, Logistics
To: Assistant Chief of Staff, Facilities

Subj: HAZARDOUS MATERIAL DISPOSAL PROGRAM

Ref: (a) Yr ltr 5241 MRAD dtd 15 Jul 1986

1. As requested by the reference, the primary hazardous material disposal office for the Logistics Department is the Supply Support/Maintenance Management office. The current incumbent is Captain A. G. Owens and his telephone number is 2507/2568.

M. J. DOWNEY
By direction

Copy to:
Supsptd/MMO

Ru 5

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

BO 6240.5A
MPEAD/ae

BASE ORDER 6240.5A

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

Subj: Hazardous Material Disposal Program

Ref: (a) Resource Conservation and Recovery Act (Pub No. 94-580) (42 USC 6901-6987) (NOTAL)
(b) EPA Regulations contained in Code of Federal Regulations, Title: 40 Parts 260-265 (NOTAL)
(c) DOT Regulations contained in Code of Federal Regulations, Tital: 49 Parts 100-179 (NOTAL)
(d) BO 11090.1B
(e) BO 11320.1G

Encl: (1) Procedures for collection, storage and turn in of Hazardous Material (HM) and Hazardous Waste (HW) for disposal
(2) Responsibilities for Hazardous Material (HM)/Hazardous Waste Disposal
(3) Hazardous Waste Training Requirements and Guidelines

1. Purpose. To revise responsibilities, procedures and guidance for hazardous material (HM) and hazardous waste (HW) disposal and related environmental protection for the Camp Lejeune and Marine Corps Air Station, New River complex.

2. Cancellation. BO 6240.5

3. Background

A. Congress and the state legislatures have responded to the threats to human life and the environment caused by mismanagement and illegal spilling and dumping of toxic substances by enacting laws which not only attempt to avert future threats but which impose civil and criminal penalties. In enacting many of these environmental laws, Congress waived federal supremacy, requiring federal agencies including the Marine Corps, to comply with federal, state and local environmental laws. The same Congressional action also stripped federal officers and employees of their official immunity for violation of federal, state and local pollution control and environmental laws. Federal officers and employees now face the possibility that they may be personally liable for civil and criminal penalties and fines as well as imprisonment.

B. The Environmental Protection Agency (EPA) has authorized the State of North Carolina to enforce the requirements of references (a) and (b) through a state HW regulatory program. The Solid and Hazardous Waste Management Branch, Division of Health Services (DHS), is the primary enforcing agency within North Carolina. DHS enforcement personnel have authority to investigate HW spills and perform routine inspections of work sites where HW are ahndled and stored. These investigations and inspections can result in citations being issued to supervisors and/or personnel at the work site for civil and/or criminal violations of HW regulations.

C. Organizational commanders subject to this Order should be aware that four basic management issues must be addressed if HW are to be safely and efficiently handled and legal requirements satisfied. These are: use of proper type containers in good condition; clear, accurate marking and labeling of containers; availability of adequate supplies, equipment and storage facilities; and most important, proper HW training for all personnel routinely involved in HW management. Enclosures (1), (2) and (3) provide revised responsibilities, guidelines and procedures for HW management and related personnel training. HW training for military personnel is a major ongoing problem due to personnel turn over rates.

D. Major commands have established two collateral duty positions to coordinate and to assist with the implementation of the subject program. These are titled Hazardous Material Disposal Coordinator (HMDC) and Hazardous Material Disposal Officer (HMDO).

HMDC AND HMDO responsibilities are outlined in enclosure (2). The appointment and training of qualified primary and alternate HMDCs and HMDOs is essential to implementation of the complex requirements of the subject program.

4. Action.

A. Organizational commanders shall on a continuing basis take action required to implement the following HW management goals and objectives:

(1) HW operations will be supervised by properly trained personnel who have access to equipment and supplies required for handling HW safely and dealing with potential emergencies.

(2) HW training plans will be developed and implemented for all HW managers and handlers, and appropriate records maintained to document that proper training is being provided to personnel.

(3) OIC/NCOIC's will ensure that HW facilities are inspected weekly and timely corrective action is taken and properly documented per this Order and related instructions of HMDO/HMDC.

(4) OIC/NCOIC's will prepare a written HW management SOP in cooperation with HMDO for each facility where HW are routinely handled and stored. SOP will be readily available at facility.

(5) A system of internal controls will be implemented continuously in a manner which ensures that violations of this Order are identified and proper level of disciplinary action is taken to discourage recurring violations.

B. Major commands will take action requried to limit HW generation to the fewest locations practical, to identify HW handling and storage equipment and facilities requirements and to develop and implement a system of internal controls which provides satisfactory compliance with the requirements of this Order and related regulatory requirements. As a minimum the following action will be taken:

(1) Appoint a primary and alternate HMDC with authority and resources to implement duties outlined in enclosure (2).

(2) Maintain at all times a listing/directory of facilities where HW are handled and stored.

(3) Require OIC/NCOIC's in charge of HW handling and storage facilities to develop and implement a written HW SOP for each facility. The SOP will be readily available to personnel routinely handling HW or dealing with HW and related emergency response.

(4) Require Commanding Officers of each Marine Air Group, Regiment, Battalion and separate Company (or equivalent) to appoint a HMDO with the authority and resources to carry out the duties outlined in enclosure (2).

(5) Establish and promote HW management goals and objectives for supply and maintenance functions which promote the minimization of the volume and toxicity of HW generation.

5. Concurrence. This Order has been coordinated and concurred in by the Commanding Generals, II Marine Amphibious Force, 2d Marine Division, FMF, 2d Force Service Support Group (Rein), FMF, 6th Marine Amphibious Brigade, FMF, and the Commanding Officers, Marine Corps Air Station, New River, Naval Hospital and the Naval Dental Clinic.

M. C. HARRINGTON
Chief of Staff

DISTRIBUTION: A

PROCEDURES FOR COLLECTION, STORAGE AND TURN-IN OF HAZARDOUS WASTE (HW) AND HAZARDOUS MATERIAL (HM) FOR RECYCLING OR DISPOSAL

1. Hazardous Waste Management Standard Operating Procedures (HWMSOP). Each organization routinely generating or handling HW or disposing of HM will develop desk top procedures to be followed. As a minimum, the HWMSOP will prove the following:

a. Name and telephone number of cognizant Hazardous Material Disposal Officer (HMDO) and Hazardous Material Disposal Coordinator (HMDC).

b. Copy of BO 6240.5_ and 11090.1_.

c. Name, title, duties and HW training records for each employee per enclosure (3).

d. Waste Identification Document (WID) for each HW generated or handled completed per attachment (A) of this enclosure.

e. Procedures and responsibilities for dealing with HW/HM spills and related emergencies.

f. Copies of weekly inspections of HW storage areas/containers.

g. Guidance provided by HMDO/HMDC's to implement HW/HM disposal program.

h. Location sketch for each HW storage area.

2. HM/HW Collection and Storage Procedures/Requirements.

a. Possession of a properly completed and signed WID constitutes authorization to generate, handle or store a HW. Failure to submit a WID to HMDC within 30 days of date HW first generated or handled or 60 days of the date of this Order (whichever is later) will be considered a violation of this Order. HMDC's are responsible for monitoring and enforcement of this requirement.

b. Only Department of Transportation (DOT) approved containers labeled per attachment (B) will be used for storage of HW awaiting disposal. HMDO's are responsible for enforcing this standard.

c. All personnel routinely handling or responsible for HW management must be properly trained per this Order and references (a) and (b). OIC's are responsible for maintaining training records for personnel within their cognizance. HMDC's are responsible for enforcement of this requirement.

d. All HW containers and storage areas will be inspected weekly using format provided by cognizant HMDC/HMDO. A written record of corrective action will be maintained per HMDO/HMDC guidance. Director, NREAD, MCB will assist HMDC/HMDO develop guidelines.

e. Spills of HW/HM will be promptly reported to the Base Fire Department at the Emergency Telephone Number 451-3333. OIC's are responsible for maintaining absorbents, safety equipment, and other supplies and equipment required for dealing with routine spills. HWMSOP's will give specific guidance in this area.

f. A Form DD 1348-1 will be completed and submitted to the cognizant HMDO not later than 45 days after the "accumulation start date" on the HW label placed on the container per attachment (B).

g. HMDC will be notified by telephone, confirmed in writing, of anytime DRMO has not accepted accountability of a HW within 75 days after the "accumulation start date" on any HW container.

3. Hazardous Material (HM) and Hazardous Waste (HW) Turn-in Procedures. The following steps will be taken to initiate final disposal of HM/HW. At any time that a major problem or controversy arises, the organization attempting to turn-in the item will immediately notify the responsible Hazardous Material Disposal Coordinator (HMDC). The HMDC will be responsible for coordinating efforts to resolve the problem/controversy and will utilize the assistance of the Director, Natural Resources and Environmental Affairs Division (NREAD), Facilities Department, Marine Corps Base, telephone extension 2083, 2195. Unresolved problems/controversies will be referred to the Assistant Chief of Staff, Facilities, Marine Corps Base.

STEP 1. The Officer in Charge (OIC) of the organization having physical custody of HM/HW is responsible for turn-in of HM/HW unless otherwise specified by HMDC. OIC will properly containerize the HM/HW and submit a Form DD 1348-1 to the cognizant Hazardous Material Disposal Officer (HMDO) per instructions in organization's HWMSOP. Questions not addressed by HWMSOP will be directed to HMDO.

STEP 2. The HMDO will physically inspect the HM/HW and determine if the Form DD 1348-1 is properly completed and the HM/HW is properly packaged. The HMDO will coordinate correction of any problems. Unresolved problems will be referred to cognizant HMDC for resolution. Once problem's resolved, HMDO will forward (preferably hand deliver) the Form DD 1348-1 to the Defense Reutilization and Marketing Office (DRMO) Headquarters, Bldg 906.

STEP 3. The DRMO will inspect the HM/HW if necessary, and will determine if DRMO is accountable (i.e., responsible) for disposal of the HM/HW. If DRMO determines that the local activity, not DRMO, has responsibility for disposal of the HM/HW, the DRMO will so notify the cognizant HMDC in writing with a copy to the NREAD. The HMDC and NREAD will cooperate in developing case specific procedures for disposal of the item. AC/S Logistics, MCB, will provide contracting support.

STEP 4. If DRMO determines that DRMO is accountable for HM/HW, DRMO will determine where the HM/HW will be stored awaiting disposal. HW must be stored at the DRMO facility at TP-451 complex, unless otherwise approved by the AC/S, Facilities, MCB. DRMO will submit a request to the Traffic Management Office (TMO), MCB, to arrange transportation of the HM/HW to DMRO designated facility.

STEP 5. TMO in cooperation with HMDO will determine if generating organization can safely, legally transport the item to DRMO designated facility. TMO must directly supervise transportation of HW. Whenever practical, Command turning in a HM will provide transportation. TMO and HMDO will cooperate in promoting efficient, safe transportation. Spills or other emergencies will be promptly reported to the Base Fire Department at 451-3333.

STEP 6. When the HM/HW arrives at storage facility, DRMO will inspect prior to unloading. DMRO is authorized to refuse the HM/HW if any significant discrepancies exist. DRMO will immediately notify cognizant HMDC and NREAD of DRMO's refusal to accept the HM/HW. The transporting vehicle will be secured and will not be moved outside the immediate vicinity of DRMO facility except for emergency situations involving risk to public safety or to property. DRMO, HMDC and NREAD will cooperate in making an immediate decision on corrective action. If problems cannot be promptly resolved the HM/HW will be returned to the generating organizations facilities.

STEP 7. When DRMO accepts physical custody of the HM/HW, turn-in is complete.

4. Standards for Hazardous Waste Satellite Accumulation Areas

a. General. Satellite accumulation area (SAA) is a term developed by the Environmental Protection Agency (EPA) to designate a work site which may generate and accumulate hazardous waste (HW) without regard to the 90 day storage limit normally applicable to non-permitted HW storage facilities. The purpose of setting up this special category of HW storage is to assist those generators who generate HW at a very slow rate, example, one container per every 6 months. Previously, these generators were requried to dispose of partially filled containers, a very inefficient and often expensive practice. Any work site routinely generating a HW at a rate of less than one full container per 45 day interval may benefit from being designated as a SAA. The decision to designate a work site as a SAA will be made by the cognizant Hazardous Material Disposal Coordinator (HMDC). The HMDC will develop the proposal and submit to the Director, Natural Resources and Environmental Affairs Division (NREAD), MCB, for concurrence and technical review. The HMDC will ensure that SAA requirements are incorporated into the HW SOP for the generating site.

b. SAA Requirements.

(1) SAA must meet applicable fire prevention regulations enforced by the Base Fire Protection Division.

(2) All containers must meet Department of Transportation (DOT) regulations for the specific type of materials stored in them.

(3) All containers will have a hazardous waste label attached per BO 6240.5. The "accumulation start date" will be left blank until the date container is full, at which time the current date will be entered. The container must be physically moved to the designated storage area shown in the HW SOP.

(4) A sign shall be installed at the SAA which provides the following or equivalent:

(a) IN CASE OF EMERGENCY NOTIFY BASE FIRE DISPATCHER AT 451-3333 and HAZARDOUS MATERIAL DISPOSAL OFFICER AT _____.

(b) UNAUTHORIZED PERSONNEL KEEP OUT

(c) NO SMOKING

(d) SPILL CONTINGENCY PLAN IS ATTACHED BELOW:

(5) The spill contingency plan should specify by name and title persons responsible for all key phases of HW handling and emergency response.

(6) Adequate supplies and equipment should be on hand at all times to ensure safe, timely handling of the HW and related spills and leaks.

(7) An informal inspection of the SAA will be conducted during each normal work day. Deficiencies will be promptly corrected. A log of discrepancies discovered and corrective action taken will be maintained in any format designated by OIC.

(8) Total volume of HW at SAA may not exceed 55 gallons. Filled containers must, by EPA regulations, be removed from SAA within 3 days of the date filled.

BO 6240.5A

WASTE INFORMATION DOCUMENT (WID)

DATE _____

WID # _____

1. GENERATING WORK CENTER INFORMATION

_____
Shop Contact Command Building Phone Ext.

2. WASTE IDENTIFICATION

A. WASTE NAME: Common _____ Chemical(s) _____

_____

B. PHYSICAL FORM: (CHECK) ___ Liquid ___ Solid ___ Sludge ___ Other (Specify) __

_____

C. MANUFACTURER: _____ D. NATIONAL STOCK NUMBER: _____

E. CONTAINER: (TYPE AND SIZE) _____

F. GENERATION RATE: (e.g., gal/day, lbs/day) _____

G. FREQUENCY OF GENERATION _____

H. EXPECTED ANNUAL GENERATION: (GALS, LBS) _____

I. DESCRIBE WASTE GENERATION PROCESS: _____

_____

_____

_____

J. HAS WASTE BEEN MIXED WITH ANY OTHER MATERIAL? ___ Yes ___ No If yes, specify _____

_____

3. REASON FOR DISPOSAL: (CHECK)

____ Exceeded shelf life ____ Served intended purpose ____ Unused ___ Other (specify) _____

4. CERTIFICATION: I certify that the above named materials are the only compounds in the waste containers listed above and have not been mixed with any other materials

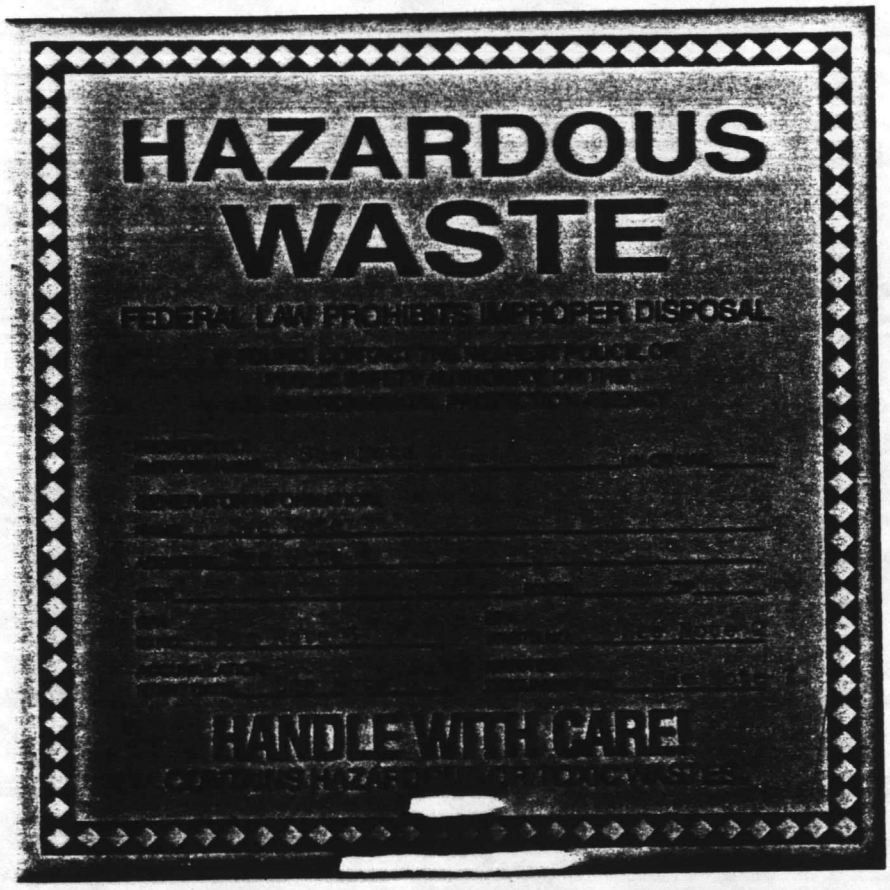
_____
HMDO DATE
Signature

5. REQUEST FOR WASTE CHARACTERIZATION BY NREAD: I am unable to properly classify the above waste. NREAD assistance is requested. Cost of Laboratory Analysis should be charged to the following Cost Account Code. _____

_____
HMDC DATE
Signature

Appendix A to
ENCLOSURE (1)

See Note 1



Note 1: The above label or equivalent will be placed on all hazardous waste (HW) containers prior to use for storage of HW. Damaged labels will be immediately replaced, using same information as on original label. If original label illegible, contact your Hazardous Material Disposal "Officer" for guidance.

Note 2: Obtain this information from your HW Standard Operating Procedure. If not available, contact your Hazardous Material Disposal Officer.

Note 3: Enter the name of the organization having physical custody of the HW at time label placed on the container, unless replacing a damaged label. See Note 1 above.

Note 4: Enter either "MCAS, New River, Jacksonville" for HW generated aboard or by organizations stationed aboard the Marine Corps Air Station, New River. Enter "Marine Corps Base, Camp Lejeune" for all other HW generated locally.

Note 5: Enter NC 8170022570 for all waste generated aboard or by organizations stationed aboard MCAS, New River. Enter NC 6170022580 for all other HW generated within the Camp Lejeune complex.

Note 6: Enter the date that HW first placed in the container unless the facility has written authorization from CG, MCB, Camp Lejeune to operate as a HW satellite accumulation area. In which case, follow instructions provided within the written authorization.

Note 7: Leave blank, will be completed by the Traffic Management Officer, Camp Lejeune.

Appendix B to
ENCLOSURE (1)

RESPONSIBILITIES FOR HAZARDOUS MATERIAL (HM)/HAZARDOUS WASTE (HW) DISPOSAL

1. Compliance with hazardous waste management and disposal regulations requires the cooperative effort of many functions within the Camp Lejeune complex. The following outlines the responsibilities of various officers and managers relative to hazardous waste management:

a. Hazardous Material Disposal Officer (HMDO) will:

(1) Provide assistance to HW generators and handlers in the preparation and timely submittal of HW turn-in documents per BO 6240.5.

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

(3) Keep OIC's and key personnel informed of any changes in regulations affecting HW activities within the HMDO's cognizance and ensure that HW standard operating procedures (SOP) are up to date and readily available for review by personnel involved in HW management.

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

(5) Develop and provide HW Training requirements to HMDC for personnel within the HMDO's cognizance.

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

(7) Conduct surveys required to identify HW generation and storage sites within the HMDO's cognizance and provide periodic updates as questioned to the HMDC.

b. Hazardous Material Disposal Coordinator (HMDC) will:

(1) Provide assistance to HMDO's in handling HW management problems. Serve as HMDO for organizations not having sufficient HW activity to justify appointment of a HMDO.

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

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

(4) Serve as command point of contact with Marine Corps Base Environmental personnel on matters dealing with worksite HW inspections by State and Federal agencies and implementation of this Order.

(5) Develop listings of HW generation and storage facilities.

(6) Develop and provide to the Base Civilian Personnel Division (CPD) the HW training requirements of the HMDC's command.

c. Assistant Chief of Staff, Facilities, Marine Corps Base will:

(1) Have overall responsibility for implementation of the subject program and maintaining compliance with requirements of references (a) and (b) and related local, state and federal regulations.

(2) Have overall responsibility for management of pollution abatement projects per latest revision of MCO P11000.8.

(3) Have overall responsibility for local implementation of Marine Corps programs to correct environmental discrepancies associated with past HM/HW disposal sites.

ENCLOSURE (2)

(4) Ensure that plans and specifications for new facilities provide adequate facilities and collateral equipment for the handling and storage of HM/HW.

d. Director, Natural Resources and Environmental Affairs Division will:

(1) Provide a staff specialist to serve as HMDC for Marine Corps Base.

(2) Provide a command point of contact with state and federal agencies on matters pertaining to the subject program.

(3) Monitor ongoing activities as required to identify, evaluate and provide up-channel reporting of environmental deficiencies related to the subject program.

(4) Coordinate day-to-day implementation of this Order and provide the following types of technical assistance:

(a) Laboratory support, if required, for HW identification.

(b) Training to HMDC's and HMDO's on state and federal environmental laws, regulations and procedures.

(c) Guidance on HM/HW SOP preparation.

(d) Guidance on HM/HW spill preventation, control, cleanup and related HW disposal.

(e) Coordination of HM/HW recycling/minimization program.

(f) Preparation and submission of reports to regulatory agencies required by references (a) and (b).

e. Base Maintenance Officer will:

(1) Collect and dispose of used POL's and oily wastes from collection tanks and other oil pollution abatement facilities in a manner consistent with this Order and references (a) and (b).

(2) Unless otherwise provided, operate and maintain industrial waste collection and pretreatment facilities associated with base sewage collection and treatment systems.

(3) Provide HM/HW spill response services in accordance with reference (d).

f. Base Fire Chief will:

(1) Provide HM/HW spill and related emergency services per references (d) and (e).

(2) Provide routine inspections of facilities where HM/HW are stored and handled, and report all discrepancies to cognizant HMDC. Elimination of the following hazards will be stressed:

(a) HM/HW stored in defective containers or containers which are not properly marked with the chmical name, NSN (if appropriate) and hazard label of the contents.

(b) Incompatible HM/HW are stored in a manner with significant potential threat of fire, explosion, or release of toxic fumes or gases due to chemical reaction during spills or leaks.

(c) HM/HW stored in a manner likely to result in a significant discharge to the environment.

g. Assistant Chief of Staff, Logistics will:

(1) Appoint an officer to serve as HMDO for the Logistics Department.

(2) Ensure that suppliers provide hazardous material safety data sheets for all HM procured through open purchase and will provide one copy to unit ordering HM and one copy to the Base Safety Manager.

(3) Develop and implement a program to provide, on a continuing and reimbursable basis, empty containers, labels, labeling equipment, absorbents, and other HM/HW handling supplies required to implement this Order and BO 11090.1B.

(4) Provide contracting services required to dispose of HM or HW for which DRMO is not accountable.

h. Traffic Management Officer, Logistics Department, Marine Corps Base will serve as principal agent for the Commanding General on matters pertaining to HM and HW transportation, and will be responsible for:

(1) Monitoring all HW transportation for compliance with requirements of references (a), (b) and (c) and related state and federal regulations.

(2) Providing transportation services and related record keeping required for implementation of this Order and which are not available from the Defense Reutilization and Marketing Officer (DRMO) or the organization generating the HM/HW.

i. Assistant Chief of Staff, Manpower will:

(1) Develop and implement a comprehensive HW personnel training plan meeting the requirements of reference (b) and related State of North Carolina regulations.

(2) Coordinate local implementation of the Marine Corps Hazardous Material Information System, per MCO 5100.2S and provide safety data and related technical support to HMDC's, HMDO's and other cognizant officials as required to implement this Order.

j. Officer is Charge, Preservation, Packaging and Packing (PP&P) Section, 2dFSSG will provide PP&P support (in accordance with established regulations and procedures) to HMDO's, HMDC's, TMO and DRMO required to accomplish the following:

(1) Identification of type of containers and labeling required for compliance with reference (c) and this Order.

(2) Packaging of HM/HW required for safe storage and transportation during disposal per this Order.

(3) HM transportation certification required for compliance with reference (c).

k. Defense Reutilization and Marketing Officer (DRMO) will:

(1) Operate the base Long-Term Hazardous Waste Storage Facility at the TP-451 complex in accordance with state permit issued under regulations promulgated under references (a) and (b).

(2) Provide HM amd HW disposal services to organizations within the Camp Lejeune/MCAS, New River complex in accordance with DOD regulations, references (a) and (b), and related state and federal regulations.

(3) Receive and process HM/HW turn-in documents in a timely manner and provide prompt notification to HMDO's of any document not satisfying applicable turn in criteria or which contain HM/HW for which DRMO is not accountable.

(4) Maintain records of DRMO HM/HW storage and disposal activity in a manner which provides information required for preparation and timely submittal of required reports to state and federal regulatory agenciea.

(5) Keeps HMDC's, HMDO's and other cognizant officers informed of changes in DRMO policies and procedures which affect local implementation of the subject program.

1. Commanding Officers of the following Base Commands/Organizations will designate a Primary and Alternate HMDO to carry out duties outlined in 1a and 1b above: Marine Corps Engineer School; Rifle Range Detachment; Field Medical Service Support School; Marine Corps Service Support School; Reserve Support Unit; Infantry Training School; Support Battalion; Headquarters Battalion; Assistant Chief of Staff, Morale, Welfare and Recreation; Assistant Chief of Staff, Logistics, and Base Maintenance Officer within their respective commands/organizations.

HAZARDOUS WASTE TRAINING REQUIREMENTS AND GUIDELINES

1. Hazardous waste (HW) training is a specific requirement of state and federal regulations promulgated under the Resource Conservation and Recovery Act (RCRA). A review of RCRA requirements and the actual HW activity aboard the Camp Lejeune/Marine Corps Air Station, New River complex indicates that a relatively small percentage of personnel require highly specialized HW training. Generally, the requirements for the remaining personnel involved in HW management are satisfied by routine on-the-job training and related safety and fire-prevention training readily available locally. Providing this training will have minor impact on organizational commanders, in that training required is directly job related. Attachment (A) Part II outlines the minimum HW training required for all categories of employees identified in Section 2 below.

2. For the purpose of these guidelines, only those personnel directly involved in HW handling, storage and disposal will be subject to the HW training documentation requirements of RCRA. A special HW training record, i.e., Attachment (A) Part I or II (or equivalent) will be developed for the following personnel:

a. All Hazardous Material Disposal Officers (HMDO), Hazardous Material Disposal Coordinators (HMDC), and alternate HMDO's and HMDC's.

b. Defense Reutilization and Marketing Officer (DRMO) and subordinate personnel routinely involved in HW handling, storage, turn-in and disposal.

c. Deputy Traffic Management Officer (TMO) and subordinate personnel involved in transportation and related certification of HW for shipment per DOT regulations.

d. Personnel assigned to work places meeting the definition of HW generators, HW accumulation areas or satellite HW accumulation areas and involved in one or more of the following:

(1) Collection and storage of HW.

(2) Inspection, and related follow-up, of HW handling/storage areas.

(3) Response to HW spills and related emergencies.

(4) Preparation and submittal of HW turn-in documents.

3. Other activity personnel providing professional and technical support to HW management include the following:

a. Fire Protection personnel

b. Safety specialists

c. Environmental staff

d. Industrial hygenists

Preparation of Attachment (A) Part I or II for these staff specialists and emergency personnel are not required. Duties and training provided to these individuals will consist of standard position descriptions and civilian personnel records.

4. Responsibility for providing specialized HW training required for compliance with RCRA is assigned to Assistant Chief of Staff, Manpower, Marine Corps Base. The following officials are responsible for notifying Assistant Chief of Staff, Manpower, or specialized training requirements of their subordinates and other personnel as shown.

a. The DRMO for self and subordinates

b. The TMO for subordinates

c. HMDC's for personnel shown in 2d above within HMDC's cognizance

ENCLOSURE (3)

d. Director, Natural Resources and Environmental Affairs Division (NREAD) for subordinates and primary and alternate HMDC's and HMDO's.

Organizational commanders are responsible for developing and implementing training plans and procedures to provide RCRA required training and maintain records outlined in Attachment (A). Organizational commanders will ensure that all new/newly assigned personnel are provided appropriate HW training and close supervision required to comply with RCRA and applicable personnel safety fire prevention and occupational health standards. Organizational commanders will notify HMDC's of HW training requirements. Notification will include names and addresses of persons to be trained and an accurate description of the training required. HMDC and Assistant Chief of Staff, Manpower representative will coordinate the scheduling and funding of specialized HW training.

5. Records of HW training must be maintained for each employee for three years after employee transferred or terminated, except as follows: if an employee is transferred to a HW related position within the Camp Lejeune/Marine Corps Air Station, New River complex, the HW training records will be transferred to the new organization. Responsibility for maintaining official files of HW training records are as follows:

a. HMDC's will maintain records of HW training for HMDC's, HMDO's and alternate HMDC's and HMDO's within their cognizance.

b. DRMO will maintain HW training records for all employees identified in paragraph 2b above.

c. TMO will maintain HW training records for all employees identified in paragraph 2c above.

d. HW training records for all employees identified in paragraphs 5(a)-5(c) will be maintained on Attachment (A) Part I. Records of personnel identified in paragraph 5(d) will be maintained on Attachment (A) Part II. HMDO will maintain HW training records for personnel identified in paragraph 5(d) above. A copy of training records for personnel identified in paragraph 5(d) above will be maintained in HWMSOP.

ENCLOSURE (3)

RECORD OF HAZARDOUS WASTE TRAINING

1. Employee Name: _____

2. Job Title/MOS: _____

3. Name of Organization: _____

4. Date this Record Established: _____

5. Description of HW Duty: _____

6. Description of HW Training Completed:

a. Date	b. Description of Training/Trainer Name of	c. Signature and Date

Appendix A to
ENCLOSURE (3)

PART II

MINIMUM LEVELS AND RECORD KEEPING FOR HAZARDOUS WASTE MANAGEMENT ORIENTATION TRAINING

1. Name of Organization: _____

2. Description of Training: The personnel shown below were provided a minimum of one and one-half hours of on-the-job training covering the following:

a. Review of the types and characteristics of HM/HW handled.

b. Review of activity oil and hazardous substance spill preventation and contingency plan contained in BO 11090.1_.

c. Organizational procedures and policy for implementation of BO 6240.5.

d. Procedures to follow in protecting personal safety during HM/HW emergencies.

e. Review of the HW Standard Operating Procedure for the organization.

The training included question and answer session at the end of training.

3. Personnel Training Provided to:

Name of Trainee	Name of Trainer	Training Date	Trainer/Trainee Signatures

Appendix A to
ENCLOSURE (3)

Ru F

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

BO 6240.5A
MPEAB/st

BASE ORDER 6240.5A

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

Subj: Hazardous Material Disposal Program

Ref: (a) Resource Conservation and Recovery Act (Pub No. 94-580) (42 USC 6901-6987) (NOTAL)
(b) EPA Regulations contained in Code of Federal Regulations, Title: 40 Parts 260-265 (NOTAL)
(c) DOT Regulations contained in Code of Federal Regulations, Tital: 49 Parts 100-179 (NOTAL)
(d) BO 11090.1B
(e) BO 11320.1G

Encl: (1) Procedures for collection, storage and turn in of Hazardous Material (HM) and Hazardous Waste (HW) for disposal
(2) Responsibilities for Hazardous Material (HM)/Hazardous Waste Disposal
(3) Hazardous Waste Training Requirements and Guidelines

1. Purpose. To revise responsibilities, procedures and guidance for hazardous material (HM) and hazardous waste (HW) disposal and related environmental protection for the Camp Lejeune and Marine Corps Air Station, New River complex.

2. Cancellation. BO 6240.5

3. Background

A. Congress and the state legislatures have responded to the threats to human life and the environment caused by mismanagement and illegal spilling and dumping of toxic substances by enacting laws which not only attempt to avert future threats but which impose civil and criminal penalties. In enacting many of these environmental laws, Congress waived federal supremacy, requiring federal agencies including the Marine Corps, to comply with federal, state and local environmental laws. The same Congressional action also stripped federal officers and employees of their official immunity for violation of federal, state and local pollution control and environmental laws. Federal officers and employees now face the possibility that they may be personally liable for civil and criminal penalties and fines as well as imprisonment.

B. The Environmental Protection Agency (EPA) has authorized the State of North Carolina to enforce the requirements of references (a) and (b) through a state HW regulatory program. The Solid and Hazardous Waste Management Branch, Division of Health Services (DHS), is the primary enforcing agency within North Carolina. DHS enforcement personnel have authority to investigate HW spills and perform routine inspections of work sites where HW are ahndled and stored. These investigations and inspections can result in citations being issued to supervisors and/or personnel at the work site for civil and/or criminal violations of HW regulations.

C. Organizational commanders subject to this Order should be aware that four basic management issues must be addressed if HW are to be safely and efficiently handled and legal requirements satisfied. These are: use of proper type containers in good condition; clear, accurate marking and labeling of containers; availability of adequate supplies, equipment and storage facilities; and most important, proper HW training for all personnel routinely involved in HW management. Enclosures (1), (2) and (3) provide revised responsibilities, guidelines and procedures for HW management and related personnel training. HW training for military personnel is a major ongoing problem due to personnel turn over rates.

D. Major commands have established two collateral duty positions to coordinate and to assist with the implementation of the subject program. These are titled Hazardous Material Disposal Coordinator (HMDC) and Hazardous Material Disposal Officer (HMDO).

HMDC AND HMDO responsibilities are outlined in enclosure (2). The appointment and training of qualified primary and alternate HMDCs and HMDOs is essential to implementation of the complex requirements of the subject program.

4. Action.

A. Organizational commanders shall on a continuing basis take action required to implement the following HW management goals and objectives:

(1) HW operations will be supervised by properly trained personnel who have access to equipment and supplies required for handling HW safely and dealing with potential emergencies.

(2) HW training plans will be developed and implemented for all HW managers and handlers, and appropriate records maintained to document that proper training is being provided to personnel.

(3) OIC/NCOIC's will ensure that HW facilities are inspected weekly and timely corrective action is taken and properly documented per this Order and related instructions of HMDO/HMDC.

(4) OIC/NCOIC's will prepare a written HW management SOP in cooperation with HMDO for each facility where HW are routinely handled and stored. SOP will be readily available at facility.

(5) A system of internal controls will be implemented continuously in a manner which ensures that violations of this Order are identified and proper level of disciplinary action is taken to discourage recurring violations.

B. Major commands will take action requried to limit HW generation to the fewest locations practical, to identify HW handling and storage equipment and facilities requirements and to develop and implement a system of internal controls which provides satisfactory compliance with the requirements of this Order and related regulatory requirements. As a minimum the following action will be taken:

(1) Appoint a primary and alternate HMDC with authority and resources to implement duties outlined in enclosure (2).

(2) Maintain at all times a listing/directory of facilities where HW are handled and stored.

(3) Require OIC/NCOIC's in charge of HW handling and storage facilities to develop and implement a written HW SOP for each facility. The SOP will be readily available to personnel routinely handling HW or dealing with HW and related emergency response.

(4) Require Commanding Officers of each Marine Air Group, Regiment, Battalion and separate Company (or equivalent) to appoint a HMDO with the authority and resources to carry out the duties outlined in enclosure (2).

(5) Establish and promote HW management goals and objectives for supply and maintenance functions which promote the minimization of the volume and toxicity of HW generation.

5. Concurrence. This Order has been coordinated and concurred in by the Commanding Generals, II Marine Amphibious Force, 2d Marine Division, FMF, 2d Force Service Support Group (Rein), FMF, 6th Marine Amphibious Brigade, FMF, and the Commanding Officers, Marine Corps Air Station, New River, Naval Hospital and the Naval Dental Clinic.

M. C. HARRINGTON
Chief of Staff

DISTRIBUTION: A

PROCEDURES FOR COLLECTION, STORAGE AND TURN-IN OF HAZARDOUS WASTE (HW) AND HAZARDOUS MATERIAL (HM) FOR RECYCLING OR DISPOSAL

1. Hazardous Waste Management Standard Operating Procedures (HWMSOP). Each organization routinely generating or handling HW or disposing of HM will develop desk top procedures to be followed. As a minimum, the HWMSOP will prove the following:

a. Name and telephone number of cognizant Hazardous Material Disposal Officer (HMDO) and Hazardous Material Disposal Coordinator (HMDC).

b. Copy of BO 6240.5_ and 11090.1_.

c. Name, title, duties and HW training records for each employee per enclosure (3).

d. Waste Identification Document (WID) for each HW generated or handled completed per attachment (A) of this enclosure.

e. Procedures and responsibilities for dealing with HW/HM spills and related emergencies.

f. Copies of weekly inspections of HW storage areas/containers.

g. Guidance provided by HMDO/HMDC's to implement HW/HM disposal program.

h. Location sketch for each HW storage area.

2. HM/HW Collection and Storage Procedures/Requirements.

a. Possession of a properly completed and signed WID constitutes authorization to generate, handle or store a HW. Failure to submit a WID to HMDC within 30 days of date HW first generated or handled or 60 days of the date of this Order (whichever is later) will be considered a violation of this Order. HMDC's are responsible for monitoring and enforcement of this requirement.

b. Only Department of Transportation (DOT) approved containers labeled per attachment (B) will be used for storage of HW awaiting disposal. HMDO's are responsible for enforcing this standard.

c. All personnel routinely handling or responsible for HW management must be properly trained per this Order and references (a) and (b). OIC's are responsible for maintaining training records for personnel within their cognizance. HMDC's are responsible for enforcement of this requirement.

d. All HW containers and storage areas will be inspected weekly using format provided by cognizant HMDC/HMDO. A written record of corrective action will be maintained per HMDO/HMDC guidance. Director, NREAD, MCB will assist HMDC/HMDO develop guidelines.

e. Spills of HW/HM will be promptly reported to the Base Fire Department at the Emergency Telephone Number 451-3333. OIC's are responsible for maintaining absorbents, safety equipment, and other supplies and equipment required for dealing with routine spills. HWMSOP's will give specific guidance in this area.

f. A Form DD 1348-1 will be completed and submitted to the cognizant HMDO not later than 45 days after the "accumulation start date" on the HW label placed on the container per attachment (B).

g. HMDC will be notified by telephone, confirmed in writing, of anytime DRMO has not accepted accountability of a HW within 75 days after the "accumulation start date" on any HW container.

Enclosure (1)

3. Hazardous Material (HM) and Hazardous Waste (HW) Turn-in Procedures. The following steps will be taken to initiate final disposal of HM/HW. At any time that a major problem or controversy arises, the organization attempting to turn-in the item will immediately notify the responsible Hazardous Material Disposal Coordinator (HMDC). The HMDC will be responsible for coordinating efforts to resolve the problem/controversy and will utilize the assistance of the Director, Natural Resources and Environmental Affairs Division (NREAD), Facilities Department, Marine Corps Base, telephone extension 2083, 2195. Unresolved problems/controversies will be referred to the Assistant Chief of Staff, Facilities, Marine Corps Base.

STEP 1. The Officer in Charge (OIC) of the organization having physical custody of HM/HW is responsible for turn-in of HM/HW unless otherwise specified by HMDC. OIC will properly containerize the HM/HW and submit a Form DD 1348-1 to the cognizant Hazardous Material Disposal Officer (HMDO) per instructions in organization's HWMSOP. Questions not addressed by HWMSOP will be directed to HMDO.

STEP 2. The HMDO will physically inspect the HM/HW and determine if the Form DD 1348-1 is properly completed and the HM/HW is properly packaged. The HMDO will coordinate correction of any problems. Unresolved problems will be referred to cognizant HMDC for resolution. Once problem's resolved, HMDO will forward (preferably hand deliver) the Form DD 1348-1 to the Defense Reutilization and Marketing Office (DRMO) Headquarters, Bldg 906.

STEP 3. The DRMO will inspect the HM/HW if necessary, and will determine if DRMO is accountable (i.e., responsible) for disposal of the HM/HW. If DRMO determines that the local activity, not DRMO, has responsibility for disposal of the HM/HW, the DRMO will so notify the cognizant HMDC in writing with a copy to the NREAD. The HMDC and NREAD will cooperate in developing case specific procedures for disposal of the item. AC/S Logistics, MCB, will provide contracting support.

STEP 4. If DRMO determines that DRMO is accountable for HM/HW, DRMO will determine where the HM/HW will be stored awaiting disposal. HW must be stored at the DRMO facility at TP-451 complex, unless otherwise approved by the AC/S, Facilities, MCB. DRMO will submit a request to the Traffic Management Office (TMO), MCB, to arrange transportation of the HM/HW to DMRO designated facility.

STEP 5. TMO in cooperation with HMDO will determine if generating organization can safely, legally transport the item to DRMO designated facility. TMO must directly supervise transportation of HW. Whenever practical, Command turning in a HM will provide transportation. TMO and HMDO will cooperate in promoting efficient, safe transportation. Spills or other emergencies will be promptly reported to the Base Fire Department at 451-3333.

STEP 6. When the HM/HW arrives at storage facility, DRMO will inspect prior to unloading. DMRO is authorized to refuse the HM/HW if any significant discrepancies exist. DRMO will immediately notify cognizant HMDC and NREAD of DRMO's refusal to accept the HM/HW. The transporting vehicle will be secured and will not be moved outside the immediate vicinity of DRMO facility except for emergency situations involving risk to public safety or to property. DRMO, HMDC and NREAD will cooperate in making an immediate decision on corrective action. If problems cannot be promptly resolved the HM/HW will be returned to the generating organizations facilities.

STEP 7. When DRMO accepts physical custody of the HM/HW, turn-in is complete.

4. Standards for Hazardous Waste Satellite Accumulation Areas

a. General. Satellite accumulation area (SAA) is a term developed by the Environmental Protection Agency (EPA) to designate a work site which may generate and accumulate hazardous waste (HW) without regard to the 90 day storage limit normally applicable to non-permitted HW storage facilities. The purpose of setting up this special category of HW storage is to assist those generators who generate HW at a very slow rate, example, one container per every 6 months. Previously, these generators were requried to dispose of partially filled containers, a very inefficient and often expensive practice. Any work site routinely generating a HW at a rate of less than one full container per 45 day interval may benefit from being designated as a SAA. The decision to designate a work site as a SAA will be made by the cognizant Hazardous Material Disposal Coordinator (HMDC). The HMDC will develop the proposal and submit to the Director, Natural Resources and Environmental Affairs Division (NREAD), MCB, for concurrence and technical review. The HMDC will ensure that SAA requirements are incorporated into the HW SOP for the generating site.

b. SAA Requirements.

(1) SAA must meet applicable fire prevention regulations enforced by the Base Fire Protection Division.

(2) All containers must meet Department of Transportation (DOT) regulations for the specific type of materials stored in them.

(3) All containers will have a hazardous waste label attached per BO 6240.5. The "accumulation start date" will be left blank until the date container is full, at which time the current date will be entered. The container must be physically moved to the designated storage area shown in the HW SOP.

(4) A sign shall be installed at the SAA which provides the following or equivalent:

(a) IN CASE OF EMERGENCY NOTIFY BASE FIRE DISPATCHER AT 451-3333 and HAZARDOUS MATERIAL DISPOSAL OFFICER AT _____.

(b) UNAUTHORIZED PERSONNEL KEEP OUT

(c) NO SMOKING

(d) SPILL CONTINGENCY PLAN IS ATTACHED BELOW:

(5) The spill contingency plan should specify by name and title persons responsible for all key phases of HW handling and emergency response.

(6) Adequate supplies and equipment should be on hand at all times to ensure safe, timely handling of the HW and related spills and leaks.

(7) An informal inspection of the SAA will be conducted during each normal work day. Deficiencies will be promptly corrected. A log of discrepancies discovered and corrective action taken will be maintained in any format designated by OIC.

(8) Total volume of HW at SAA may not exceed 55 gallons. Filled containers must, by EPA regulations, be removed from SAA within 3 days of the date filled.

BO 6240.5A

WASTE INFORMATION DOCUMENT (WID)

DATE _____

WID # _____

1. GENERATING WORK CENTER INFORMATION

_____
Shop Contact Command Building Phone Ext.

2. WASTE IDENTIFICATION

A. WASTE NAME: Common _____ Chemical(s) _____

_____

B. PHYSICAL FORM: (CHECK) ___ Liquid ___ Solid ___ Sludge ___ Other (Specify) ___

_____

C. MANUFACTURER: _____ D. NATIONAL STOCK NUMBER: _____

E. CONTAINER: (TYPE AND SIZE) _____

F. GENERATION RATE: (e.g., gal/day, lbs/day) _____

G. FREQUENCY OF GENERATION _____

H. EXPECTED ANNUAL GENERATION: (GALS, LBS) _____

I. DESCRIBE WASTE GENERATION PROCESS: _____

_____

_____

_____

J. HAS WASTE BEEN MIXED WITH ANY OTHER MATERIAL? ___ Yes ___ No If yes, specify _____

_____

3. REASON FOR DISPOSAL: (CHECK)

____ Exceeded shelf life ____ Served intended purpose ____ Unused ___ Other (specify) _____

4. CERTIFICATION: I certify that the above named materials are the only compounds in the waste containers listed above and have not been mixed with any other materials

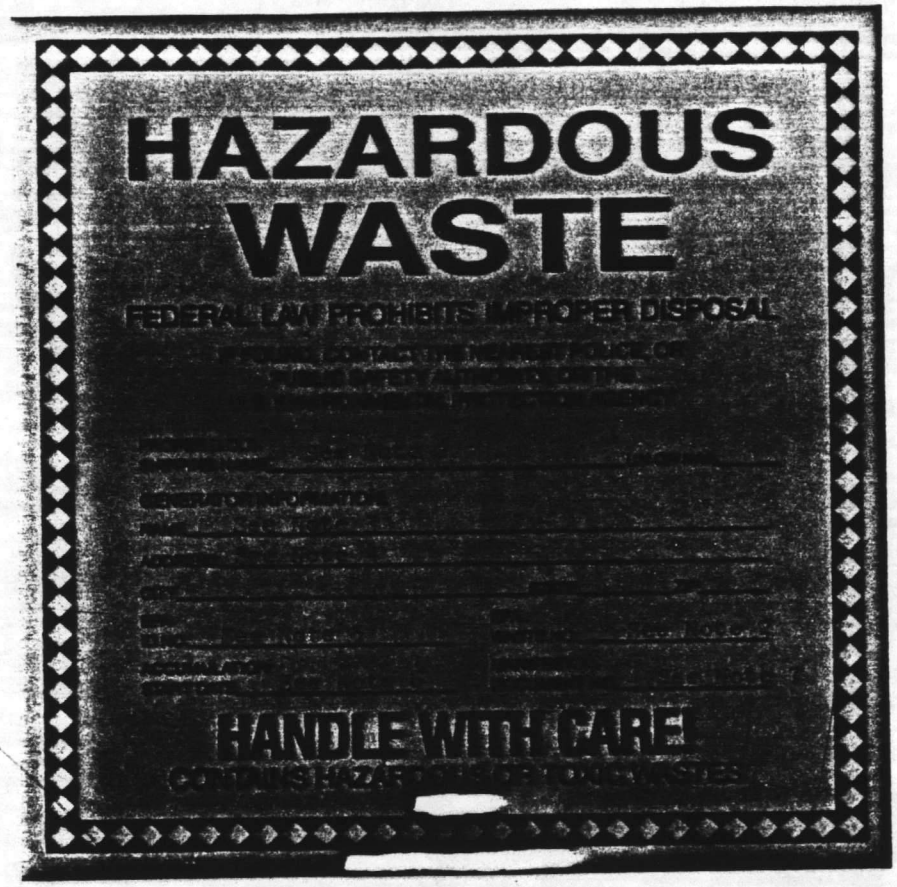
_____
HMDO DATE
Signature

5. REQUEST FOR WASTE CHARACTERIZATION BY NREAD: I am unable to properly classify the above waste. NREAD assistance is requested. Cost of Laboratory Analysis should be charged to the following Cost Account Code. _____

_____
HMDC DATE
Signature

Appendix A to
ENCLOSURE (1)

See Note 1



Note 1: The above label or equivalent will be placed on all hazardous waste (HW) containers prior to use for storage of HW. Damaged labels will be immediately replaced, using same information as on original label. If original label illegible, contact your Hazardous Material Disposal "Officer" for guidance.

Note 2: Obtain this information from your HW Standard Operating Procedure. If not available, contact your Hazardous Material Disposal Officer.

Note 3: Enter the name of the organization having physical custody of the HW at time label placed on the container, unless replacing a damaged label. See Note 1 above.

Note 4: Enter either "MCAS, New River, Jacksonville" for HW generated aboard or by organizations stationed aboard the Marine Corps Air Station, New River. Enter "Marine Corps Base, Camp Lejeune" for all other HW generated locally.

Note 5: Enter NC 8170022570 for all waste generated aboard or by organizations stationed aboard MCAS, New River. Enter NC 6170022580 for all other HW generated within the Camp Lejeune complex.

Note 6: Enter the date that HW first placed in the container unless the facility has written authorization from CG, MCB, Camp Lejeune to operate as a HW satellite accumulation area. In which case, follow instructions provided within the written authorization.

Note 7: Leave blank, will be completed by the Traffic Management Officer, Camp Lejeune.

Appendix B to
ENCLOSURE (1)

RESPONSIBILITIES FOR HAZARDOUS MATERIAL (HM)/HAZARDOUS WASTE (HW) DISPOSAL

1. Compliance with hazardous waste management and disposal regulations requires the cooperative effort of many functions within the Camp Lejeune complex. The following outlines the responsibilities of various officers and managers relative to hazardous waste management:

a. Hazardous Material Disposal Officer (HMDO) will:

(1) Provide assistance to HW generators and handlers in the preparation and timely submittal of HW turn-in documents per BO 6240.5.

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

(3) Keep OIC's and key personnel informed of any changes in regulations affecting HW activities within the HMDO's cognizance and ensure that HW standard operating procedures (SOP) are up to date and readily available for review by personnel involved in HW management.

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

(5) Develop and provide HW Training requirements to HMDC for personnel within the HMDO's cognizance.

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

(7) Conduct surveys required to identify HW generation and storage sites within the HMDO's cognizance and provide periodic updates as questioned to the HMDC.

b. Hazardous Material Disposal Coordinator (HMDC) will:

(1) Provide assistance to HMDO's in handling HW management problems. Serve as HMDO for organizations not having sufficient HW activity to justify appointment of a HMDO.

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

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

(4) Serve as command point of contact with Marine Corps Base Environmental personnel on matters dealing with worksite HW inspections by State and Federal agencies and implementation of this Order.

(5) Develop listings of HW generation and storage facilities.

(6) Develop and provide to the Base Civilian Personnel Division (CPD) the HW training requirements of the HMDC's command.

c. Assistant Chief of Staff, Facilities, Marine Corps Base will:

(1) Have overall responsibility for implementation of the subject program and maintaining compliance with requirements of references (a) and (b) and related local, state and federal regulations.

(2) Have overall responsibility for management of pollution abatement projects per latest revision of MCO P11000.8.

(3) Have overall responsibility for local implementation of Marine Corps programs to correct environmental discrepancies associated with past HM/HW disposal sites.

ENCLOSURE (2)

(4) Ensure that plans and specifications for new facilities provide adequate facilities and collateral equipment for the handling and storage of HM/HW.

d. Director, Natural Resources and Environmental Affairs Division will:

(1) Provide a staff specialist to serve as HMDC for Marine Corps Base.

(2) Provide a command point of contact with state and federal agencies on matters pertaining to the subject program.

(3) Monitor ongoing activities as required to identify, evaluate and provide up-channel reporting of environmental deficiencies related to the subject program.

(4) Coordinate day-to-day implementation of this Order and provide the following types of technical assistance:

(a) Laboratory support, if required, for HW identification.

(b) Training to HMDC's and HMDO's on state and federal environmental laws, regulations and procedures.

(c) Guidance on HM/HW SOP preparation.

(d) Guidance on HM/HW spill preventation, control, cleanup and related HW disposal.

(e) Coordination of HM/HW recycling/minimization program.

(f) Preparation and submission of reports to regulatory agencies required by references (a) and (b).

e. Base Maintenance Officer will:

(1) Collect and dispose of used POL's and oily wastes from collection tanks and other oil pollution abatement facilities in a manner consistent with this Order and references (a) and (b).

(2) Unless otherwise provided, operate and maintain industrial waste collection and pretreatment facilities associated with base sewage collection and treatment systems.

(3) Provide HM/HW spill response services in accordance with reference (d).

f. Base Fire Chief will:

(1) Provide HM/HW spill and related emergency services per references (d) and (e).

(2) Provide routine inspections of facilities where HM/HW are stored and handled, and report all discrepancies to cognizant HMDC. Elimination of the following hazards will be stressed:

(a) HM/HW stored in defective containers or containers which are not properly marked with the chmical name, NSN (if appropriate) and hazard label of the contents.

(b) Incompatible HM/HW are stored in a manner with significant potential threat of fire, explosion, or release of toxic fumes or gases due to chemical reaction during spills or leaks.

(c) HM/HW stored in a manner likely to result in a significant discharge to the environment.

g. Assistant Chief of Staff, Logistics will:

(1) Appoint an officer to serve as HMDO for the Logistics Department.

(2) Ensure that suppliers provide hazardous material safety data sheets for all HM procured through open purchase and will provide one copy to unit ordering HM and one copy to the Base Safety Manager.

(3) Develop and implement a program to provide, on a continuing and reimbursable basis, empty containers, labels, labeling equipment, absorbents, and other HM/HW handling supplies required to implement this Order and BO 11090.1B.

(4) Provide contracting services required to dispose of HM or HW for which DRMO is not accountable.

h. Traffic Management Officer, Logistics Department, Marine Corps Base will serve as principal agent for the Commanding General on matters pertaining to HM and HW transportation, and will be responsible for:

(1) Monitoring all HW transportation for compliance with requirements of references (a), (b) and (c) and related state and federal regulations.

(2) Providing transportation services and related record keeping required for implementation of this Order and which are not available from the Defense Reutilization and Marketing Officer (DRMO) or the organization generating the HM/HW.

i. Assistant Chief of Staff, Manpower will:

(1) Develop and implement a comprehensive HW personnel training plan meeting the requirements of reference (b) and related State of North Carolina regulations.

(2) Coordinate local implementation of the Marine Corps Hazardous Material Information System, per MCO 5100.2S and provide safety data and related technical support to HMDC's, HMDO's and other cognizant officials as required to implement this Order.

j. Officer is Charge, Preservation, Packaging and Packing (PP&P) Section, 2dFSSG will provide PP&P support (in accordance with established regulations and procedures) to HMDO's, HMDC's, TMO and DRMO required to accomplish the following:

(1) Identification of type of containers and labeling required for compliance with reference (c) and this Order.

(2) Packaging of HM/HW required for safe storage and transportation during disposal per this Order.

(3) HM transportation certification required for compliance with reference (c).

k. Defense Reutilization and Marketing Officer (DRMO) will:

(1) Operate the base Long-Term Hazardous Waste Storage Facility at the TP-451 complex in accordance with state permit issued under regulations promulgated under references (a) and (b).

(2) Provide HM amd HW disposal services to organizations within the Camp Lejeune/MCAS, New River complex in accordance with DOD regulations, references (a) and (b), and related state and federal regulations.

(3) Receive and process HM/HW turn-in documents in a timely manner and provide prompt notification to HMDO's of any document not satisfying applicable turn in criteria or which contain HM/HW for which DRMO is not accountable.

(4) Maintain records of DRMO HM/HW storage and disposal activity in a manner which provides information required for preparation and timely submittal of required reports to state and federal regulatory agenciea.

(5) Keeps HMDC's, HMDO's and other cognizant officers informed of changes in DRMO policies and procedures which affect local implementation of the subject program.

1. Commanding Officers of the following Base Commands/Organizations will designate a Primary and Alternate HMDO to carry out duties outlined in 1a and 1b above: Marine Corps Engineer School; Rifle Range Detachment; Field Medical Service Support School; Marine Corps Service Support School: Reserve Support Unit; Infantry Training School; Support Battalion; Headquarters Battalion; Assistant Chief of Staff, Morale, Welfare and Recreation; Assistant Chief of Staff, Logistics, and Base Maintenance Officer within their respective commands/organizations.

HAZARDOUS WASTE TRAINING REQUIREMENTS AND GUIDELINES

1. Hazardous waste (HW) training is a specific requirement of state and federal regulations promulgated under the Resource Conservation and Recovery Act (RCRA). A review of RCRA requirements and the actual HW activity aboard the Camp Lejeune/Marine Corps Air Station, New River complex indicates that a relatively small percentage of personnel require highly specialized HW training. Generally, the requirements for the remaining personnel involved in HW management are satisfied by routine on-the-job training and related safety and fire-prevention training readily available locally. Providing this training will have minor impact on organizational commanders, in that training required is directly job related. Attachment (A) Part II outlines the minimum HW training required for all categories of employees identified in Section 2 below.

2. For the purpose of these guidelines, only those personnel directly involved in HW handling, storage and disposal will be subject to the HW training documentation requirements of RCRA. A special HW training record, i.e., Attachment (A) Part I or II (or equivalent) will be developed for the following personnel:

a. All Hazardous Material Disposal Officers (HMDO), Hazardous Material Disposal Coordinators (HMDC), and alternate HMDO's and HMDC's.

b. Defense Reutilization and Marketing Officer (DRMO) and subordinate personnel routinely involved in HW handling, storage, turn-in and disposal.

c. Deputy Traffic Management Officer (TMO) and subordinate personnel involved in transportation and related certification of HW for shipment per DOT regulations.

d. Personnel assigned to work places meeting the definition of HW generators, HW accumulation areas or satellite HW accumulation areas and involved in one or more of the following:

(1) Collection and storage of HW.

(2) Inspection, and related follow-up, of HW handling/storage areas.

(3) Response to HW spills and related emergencies.

(4) Preparation and submittal of HW turn-in documents.

3. Other activity personnel providing professional and technical support to HW management include the following:

a. Fire Protection personnel

b. Safety specialists

c. Environmental staff

d. Industrial hygenists

Preparation of Attachment (A) Part I or II for these staff specialists and emergency personnel are not required. Duties and training provided to these individuals will consist of standard position descriptions and civilian personnel records.

4. Responsibility for providing specialized HW training required for compliance with RCRA is assigned to Assistant Chief of Staff, Manpower, Marine Corps Base. The following officials are responsible for notifying Assistant Chief of Staff, Manpower, or specialized training requirements of their subordinates and other personnel as shown.

a. The DRMO for self and subordinates

b. The TMO for subordinates

c. HMDC's for personnel shown in 2d above within HMDC's cognizance

ENCLOSURE (3)

d. Director, Natural Resources and Environmental Affairs Division (NREAD) for subordinates and primary and alternate HMDC's and HMDO's.

Organizational commanders are responsible for developing and implementing training plans and procedures to provide RCRA required training and maintain records outlined in Attachment (A). Organizational commanders will ensure that all new/newly assigned personnel are provided appropriate HW training and close supervision required to comply with RCRA and applicable personnel safety fire prevention and occupational health standards. Organizational commanders will notify HMDC's of HW training requirements. Notification will include names and addresses of persons to be trained and an accurate description of the training required. HMDC and Assistant Chief of Staff, Manpower representative will coordinate the scheduling and funding of specialized HW training.

5. Records of HW training must be maintained for each employee for three years after employee transferred or terminated, except as follows: if an employee is transferred to a HW related position within the Camp Lejeune/Marine Corps Air Station, New River complex, the HW training records will be transferred to the new organization. Responsibility for maintaining official files of HW training records are as follows:

a. HMDC's will maintain records of HW training for HMDC's, HMDO's and alternate HMDC's and HMDO's within their cognizance.

b. DRMO will maintain HW training records for all employees identified in paragraph 2b above.

c. TMO will maintain HW training records for all employees identified in paragraph 2c above.

d. HW training records for all employees identified in paragraphs 5(a)-5(c) will be maintained on Attachment (A) Part I. Records of personnel identified in paragraph 5(d) will be maintained on Attachment (A) Part II. HMDO will maintain HW training records for personnel identified in paragraph 5(d) above. A copy of training records for personnel identified in paragraph 5(d) above will be maintained in HWMSOP.

PART I

RECORD OF HAZARDOUS WASTE TRAINING

1. Employee Name: _____

2. Job Title/MOS: _____

3. Name of Organization: _____

4. Date this Record Established: _____

5. Description of HW Duty: _____

6. Description of HW Training Completed:

a. Date	b. Description of Training/Trainer	c. Signature and Date

Appendix A to
ENCLOSURE (3)

PART II

MINIMUM LEVELS AND RECORD KEEPING FOR HAZARDOUS WASTE MANAGEMENT ORIENTATION TRAINING

1. Name of Organization: _____

2. Description of Training: The personnel shown below were provided a minimum of one and one-half hours of on-the-job training covering the following:

a. Review of the types and characteristics of HM/HW handled.

b. Review of activity oil and hazardous substance spill preventation and contingency plan contained in BO 11090.1_.

c. Organizational procedures and policy for implementation of BO 6240.5.

d. Procedures to follow in protecting personal safety during HM/HW emergencies.

e. Review of the HW Standard Operating Procedure for the organization.

The training included question and answer session at the end of training.

3. Personnel Training Provided to:

Name of Trainee	Name of Trainer	Training Date	Trainer/Trainee Signatures

Appendix A to
ENCLOSURE (3)

6240
NREAD
25 Apr 86

Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune
Assistant Chief of Staff, Manpower, Marine Corps Base, Camp Lejeune

HAZARDOUS MATERIAL DISPOSAL PROGRAM; LEGALLY MANDATED PERSONNEL TRAINING

ef: (a) Resource Conservation and Recovery Act
(b) BO 6240.5
(c) MCO 5100.25

ncl: (1) Excerpts from NEESA Publication 15-007 of May 1985

1. The purpose of this memo is to initiate action to improve the effectiveness of the ongoing personnel training program for hazardous waste handlers and managers required by reference (a) and implemented within the Camp Lejeune complex by reference (b). The list of tables contained in the enclosure reflects the scope of training which cognizant authorities have developed to ensure compliance with reference (a). The Base training program is conducted by the Civilian Personnel Division pursuant to responsibilities assigned to the AC/S, Manpower by reference (b). While several good training sessions have been provided, the program lacks the continuity required to ensure compliance with the specific training requirements of reference (a). Additionally, the training requirements of military personnel involved in the subject program are not being met.

2. It is requested that AC/S, Manpower designate a point of contact to work with representatives of the Natural Resources and Environmental Affairs Division on resolving problems discussed above and to formalize the training program. The program must serve personnel of Marine Corps Base; Marine Corps Air Station, New River; Naval Hospital, and tenants thereof. Based on current knowledge of the subject program, approximately 200-300 people will need some level of formal training each year.

3. On a closely related matter, there exists an immediate need to provide a basic level of health and safety training to all personnel handling hazardous wastes. Reference (c) published how hazardous materials (HM) related safety and health-related technical data would be gathered, maintained and disseminated. The two main information sources are either Hazardous Material Information System (HMIS) microfiche generated by the Defense Logistics Agency (DLA), or hazardous material safety data sheets (HMSDS) generated by the manufacturer of HM.

4. It is requested that the Base Safety Manager develop and implement a training program on health and safety aspects of hazardous waste management equivalent to that outlined in the enclosure.

Subj: HAZARDOUS MATERIAL DISPOSAL PROGRAM; LEGALLY MANDATED PERSONNEL TRAINING

Training should stress how to use and interpret information on HMIS microfiche and HMSDS. Base environmental and fire protection personnel are available to assist with this training in those areas appropriate to their expertise and responsibilities.

5. Point of contact in this matter is Mr. Danny Sharpe, NREAD, extension 5003.

Writer: D. D. Sharpe, NREAD 5003
Typist: J. Cross 24Apr86

Ru

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

BO 6240.5A
MPEAD/ST

BASE ORDER 6240.5A

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

Subj: Hazardous Material Disposal Program

Ref: (a) Resource Conservation and Recovery Act (Pub No. 94-580) (42 USC 6901-6987) (NOTAL)
(b) EPA Regulations contained in Code of Federal Regulations, Title: 40 Parts 260-265 (NOTAL)
(c) DOT Regulations contained in Code of Federal Regulations, Tital: 49 Parts 100-179 (NOTAL)
(d) BO 11090.1B
(e) BO 11320.1G

Encl: (1) Procedures for collection, storage and turn in of Hazardous Material (HM) and Hazardous Waste (HW) for disposal
(2) Responsibilities for Hazardous Material (HM)/Hazardous Waste Disposal
(3) Hazardous Waste Training Requirements and Guidelines

1. Purpose. To revise responsibilities, procedures and guidance for hazardous material (HM) and hazardous waste (HW) disposal and related environmental protection for the Camp Lejeune and Marine Corps Air Station, New River complex.

2. Cancellation. BO 6240.5

3. Background

A. Congress and the state legislatures have responded to the threats to human life and the environment caused by mismanagement and illegal spilling and dumping of toxic substances by enacting laws which not only attempt to avert future threats but which impose civil and criminal penalties. In enacting many of these environmental laws, Congress waived federal supremacy, requiring federal agencies including the Marine Corps, to comply with federal, state and local environmental laws. The same Congressional action also stripped federal officers and employees of their official immunity for violation of federal, state and local pollution control and environmental laws. Federal officers and employees now face the possibility that they may be personally liable for civil and criminal penalties and fines as well as imprisonment.

B. The Environmental Protection Agency (EPA) has authorized the State of North Carolina to enforce the requirements of references (a) and (b) through a state HW regulatory program. The Solid and Hazardous Waste Management Branch, Division of Health Services (DHS), is the primary enforcing agency within North Carolina. DHS enforcement personnel have authority to investigate HW spills and perform routine inspections of work sites where HW are ahndled and stored. These investigations and inspections can result in citations being issued to supervisors and/or personnel at the work site for civil and/or criminal violations of HW regulations.

C. Organizational commanders subject to this Order should be aware that four basic management issues must be addressed if HW are to be safely and efficiently handled and legal requirements satisfied. These are: use of proper type containers in good condition; clear, accurate marking and labeling of containers; availability of adequate supplies, equipment and storage facilities; and most important, proper HW training for all personnel routinely involved in HW management. Enclosures (1), (2) and (3) provide revised responsibilities, guidelines and procedures for HW management and related personnel training. HW training for military personnel is a major ongoing problem due to personnel turn over rates.

D. Major commands have established two collateral duty positions to coordinate and to assist with the implementation of the subject program. These are titled Hazardous Material Disposal Coordinator (HMDC) and Hazardous Material Disposal Officer (HMDO).

HMDC AND HMDO responsibilities are outlined in enclosure (2). The appointment and training of qualified primary and alternate HMDCs and HMDOs is essential to implementation of the complex requirements of the subject program.

4. Action.

A. Organizational commanders shall on a continuing basis take action required to implement the following HW management goals and objectives:

(1) HW operations will be supervised by properly trained personnel who have access to equipment and supplies required for handling HW safely and dealing with potential emergencies.

(2) HW training plans will be developed and implemented for all HW managers and handlers, and appropriate records maintained to document that proper training is being provided to personnel.

(3) OIC/NCOIC's will ensure that HW facilities are inspected weekly and timely corrective action is taken and properly documented per this Order and related instructions of HMDO/HMDC.

(4) OIC/NCOIC's will prepare a written HW management SOP in cooperation with HMDO for each facility where HW are routinely handled and stored. SOP will be readily available at facility.

(5) A system of internal controls will be implemented continuously in a manner which ensures that violations of this Order are identified and proper level of disciplinary action is taken to discourage recurring violations.

B. Major commands will take action requried to limit HW generation to the fewest locations practical, to identify HW handling and storage equipment and facilities requirements and to develop and implement a system of internal controls which provides satisfactory compliance with the requirements of this Order and related regulatory requirements. As a minimum the following action will be taken:

(1) Appoint a primary and alternate HMDC with authority and resources to implement duties outlined in enclosure (2).

(2) Maintain at all times a listing/directory of facilities where HW are handled and stored.

(3) Require OIC/NCOIC's in charge of HW handling and storage facilities to develop and implement a written HW SOP for each facility. The SOP will be readily available to personnel routinely handling HW or dealing with HW and related emergency response.

(4) Require Commanding Officers of each Marine Air Group, Regiment, Battalion and separate Company (or equivalent) to appoint a HMDO with the authority and resources to carry out the duties outlined in enclosure (2).

(5) Establish and promote HW management goals and objectives for supply and maintenance functions which promote the minimization of the volume and toxicity of HW generation.

5. Concurrence. This Order has been coordinated and concurred in by the Commanding Generals, II Marine Amphibious Force, 2d Marine Division, FMF, 2d Force Service Support Group (Rein), FMF, 6th Marine Amphibious Brigade, FMF, and the Commanding Officers, Marine Corps Air Station, New River, Naval Hospital and the Naval Dental Clinic.

M. C. HARRINGTON
Chief of Staff

DISTRIBUTION: A

PROCEDURES FOR COLLECTION, STORAGE AND TURN-IN OF HAZARDOUS WASTE (HW) AND HAZARDOUS MATERIAL (HM) FOR RECYCLING OR DISPOSAL

1. Hazardous Waste Management Standard Operating Procedures (HWMSOP). Each organization routinely generating or handling HW or disposing of HM will develop desk top procedures to be followed. As a minimum, the HWMSOP will prove the following:

a. Name and telephone number of cognizant Hazardous Material Disposal Officer (HMDO) and Hazardous Material Disposal Coordinator (HMDC).

b. Copy of BO 6240.5_ and 11090.1_.

c. Name, title, duties and HW training records for each employee per enclosure (3).

d. Waste Identification Document (WID) for each HW generated or handled completed per attachment (A) of this enclosure.

e. Procedures and responsibilities for dealing with HW/HM spills and related emergencies.

f. Copies of weekly inspections of HW storage areas/containers.

g. Guidance provided by HMDO/HMDC's to implement HW/HM disposal program.

h. Location sketch for each HW storage area.

2. HM/HW Collection and Storage Procedures/Requirements.

a. Possession of a properly completed and signed WID constitutes authorization to generate, handle or store a HW. Failure to submit a WID to HMDC within 30 days of date HW first generated or handled or 60 days of the date of this Order (whichever is later) will be considered a violation of this Order. HMDC's are responsible for monitoring and enforcement of this requirement.

b. Only Department of Transportation (DOT) approved containers labeled per attachment (B) will be used for storage of HW awaiting disposal. HMDO's are responsible for enforcing this standard.

c. All personnel routinely handling or responsible for HW management must be properly trained per this Order and references (a) and (b). OIC's are responsible for maintaining training records for personnel within their cognizance. HMDC's are responsible for enforcement of this requirement.

d. All HW containers and storage areas will be inspected weekly using format provided by cognizant HMDC/HMDO. A written record of corrective action will be maintained per HMDO/HMDC guidance. Director, NREAD, MCB will assist HMDC/HMDO develop guidelines.

e. Spills of HW/HM will be promptly reported to the Base Fire Department at the Emergency Telephone Number 451-3333. OIC's are responsible for maintaining absorbents, safety equipment, and other supplies and equipment required for dealing with routine spills. HWMSOP's will give specific guidance in this area.

f. A Form DD 1348-1 will be completed and submitted to the cognizant HMDO not later than 45 days after the "accumulation start date" on the HW label placed on the container per attachment (B).

g. HMDC will be notified by telephone, confirmed in writing, of anytime DRMO has not accepted accountability of a HW within 75 days after the "accumulation start date" on any HW container.

3. Hazardous Material (HM) and Hazardous Waste (HW) Turn-in Procedures. The following steps will be taken to initiate final disposal of HM/HW. At any time that a major problem or controversy arises, the organization attempting to turn-in the item will immediately notify the responsible Hazardous Material Disposal Coordinator (HMDC). The HMDC will be responsible for coordinating efforts to resolve the problem/controversy and will utilize the assistance of the Director, Natural Resources and Environmental Affairs Division (NREAD), Facilities Department, Marine Corps Base, telephone extension 2083, 2195. Unresolved problems/controversies will be referred to the Assistant Chief of Staff, Facilities, Marine Corps Base.

STEP 1. The Officer in Charge (OIC) of the organization having physical custody of HM/HW is responsible for turn-in of HM/HW unless otherwise specified by HMDC. OIC will properly containerize the HM/HW and submit a Form DD 1348-1 to the cognizant Hazardous Material Disposal Officer (HMDO) per instructions in organization's HWMSOP. Questions not addressed by HWMSOP will be directed to HMDO.

STEP 2. The HMDO will physically inspect the HM/HW and determine if the Form DD 1348-1 is properly completed and the HM/HW is properly packaged. The HMDO will coordinate correction of any problems. Unresolved problems will be referred to cognizant HMDC for resolution. Once problem's resolved, HMDO will forward (preferably hand deliver) the Form DD 1348-1 to the Defense Reutilization and Marketing Office (DRMO) Headquarters, Bldg 906.

STEP 3. The DRMO will inspect the HM/HW if necessary, and will determine if DRMO is accountable (i.e., responsible) for disposal of the HM/HW. If DRMO determines that the local activity, not DRMO, has responsibility for disposal of the HM/HW, the DRMO will so notify the cognizant HMDC in writing with a copy to the NREAD. The HMDC and NREAD will cooperate in developing case specific procedures for disposal of the item. AC/S Logistics, MCB, will provide contracting support.

STEP 4. If DRMO determines that DRMO is accountable for HM/HW, DRMO will determine where the HM/HW will be stored awaiting disposal. HW must be stored at the DRMO facility at TP-451 complex, unless otherwise approved by the AC/S, Facilities, MCB. DRMO will submit a request to the Traffic Management Office (TMO), MCB, to arrange transportation of the HM/HW to DMRO designated facility.

STEP 5. TMO in cooperation with HMDO will determine if generating organization can safely, legally transport the item to DRMO designated facility. TMO must directly supervise transportation of HW. Whenever practical, Command turning in a HM will provide transportation. TMO and HMDO will cooperate in promoting efficient, safe transportation. Spills or other emergencies will be promptly reported to the Base Fire Department at 451-3333.

STEP 6. When the HM/HW arrives at storage facility, DRMO will inspect prior to unloading. DMRO is authorized to refuse the HM/HW if any significant discrepancies exist. DRMO will immediately notify cognizant HMDC and NREAD of DRMO's refusal to accept the HM/HW. The transporting vehicle will be secured and will not be moved outside the immediate vicinity of DRMO facility except for emergency situations involving risk to public safety or to property. DRMO, HMDC and NREAD will cooperate in making an immediate decision on corrective action. If problems cannot be promptly resolved the HM/HW will be returned to the generating organizations facilities.

STEP 7. When DRMO accepts physical custody of the HM/HW, turn-in is complete.

4. Standards for Hazardous Waste Satellite Accumulation Areas

a. General. Satellite accumulation area (SAA) is a term developed by the Environmental Protection Agency (EPA) to designate a work site which may generate and accumulate hazardous waste (HW) without regard to the 90 day storage limit normally applicable to non-permitted HW storage facilities. The purpose of setting up this special category of HW storage is to assist those generators who generate HW at a very slow rate, example, one container per every 6 months. Previously, these generators were requried to dispose of partially filled containers, a very inefficient and often expensive practice. Any work site routinely generating a HW at a rate of less than one full container per 45 day interval may benefit from being designated as a SAA. The decision to designate a work site as a SAA will be made by the cognizant Hazardous Material Disposal Coordinator (HMDC). The HMDC will develop the proposal and submit to the Director, Natural Resources and Environmental Affairs Division (NREAD), MCB, for concurrence and technical review. The HMDC will ensure that SAA requirements are incorporated into the HW SOP for the generating site.

b. SAA Requirements.

(1) SAA must meet applicable fire prevention regulations enforced by the Base Fire Protection Division.

(2) All containers must meet Department of Transportation (DOT) regulations for the specific type of materials stored in them.

(3) All containers will have a hazardous waste label attached per BO 6240.5. The "accumulation start date" will be left blank until the date container is full, at which time the current date will be entered. The container must be physically moved to the designated storage area shown in the HW SOP.

(4) A sign shall be installed at the SAA which provides the following or equivalent:

(a) IN CASE OF EMERGENCY NOTIFY BASE FIRE DISPATCHER AT 451-3333 and HAZARDOUS MATERIAL DISPOSAL OFFICER AT _____.

(b) UNAUTHORIZED PERSONNEL KEEP OUT

(c) NO SMOKING

(d) SPILL CONTINGENCY PLAN IS ATTACHED BELOW:

(5) The spill contingency plan should specify by name and title persons responsible for all key phases of HW handling and emergency response.

(6) Adequate supplies and equipment should be on hand at all times to ensure safe, timely handling of the HW and related spills and leaks.

(7) An informal inspection of the SAA will be conducted during each normal work day. Deficiencies will be promptly corrected. A log of discrepancies discovered and corrective action taken will be maintained in any format designated by OIC.

(8) Total volume of HW at SAA may not exceed 55 gallons. Filled containers must, by EPA regulations, be removed from SAA within 3 days of the date filled.

BO 6240.5A

WASTE INFORMATION DOCUMENT (WID)

DATE _____

WID # _____

1. GENERATING WORK CENTER INFORMATION

_____
Shop Contact Command Building Phone Ext.

2. WASTE IDENTIFICATION

A. WASTE NAME: Common _____ Chemical(s) _____

_____

B. PHYSICAL FORM: (CHECK) ___ Liquid ___ Solid ___ Sludge ___ Other (Specify) __

_____

C. MANUFACTURER: _____ D. NATIONAL STOCK NUMBER: _____

E. CONTAINER: (TYPE AND SIZE) _____

F. GENERATION RATE: (e.g., gal/day, lbs/day) _____

G. FREQUENCY OF GENERATION _____

H. EXPECTED ANNUAL GENERATION: (GALS, LBS) _____

I. DESCRIBE WASTE GENERATION PROCESS: _____

_____

_____

_____

J. HAS WASTE BEEN MIXED WITH ANY OTHER MATERIAL? ___ Yes ___ No If yes, specify _____

_____

3. REASON FOR DISPOSAL: (CHECK)

____ Exceeded shelf life ____ Served intended purpose ____ Unused ____ Other (specify) _____

4. CERTIFICATION: I certify that the above named materials are the only compounds in the waste containers listed above and have not been mixed with any other materials

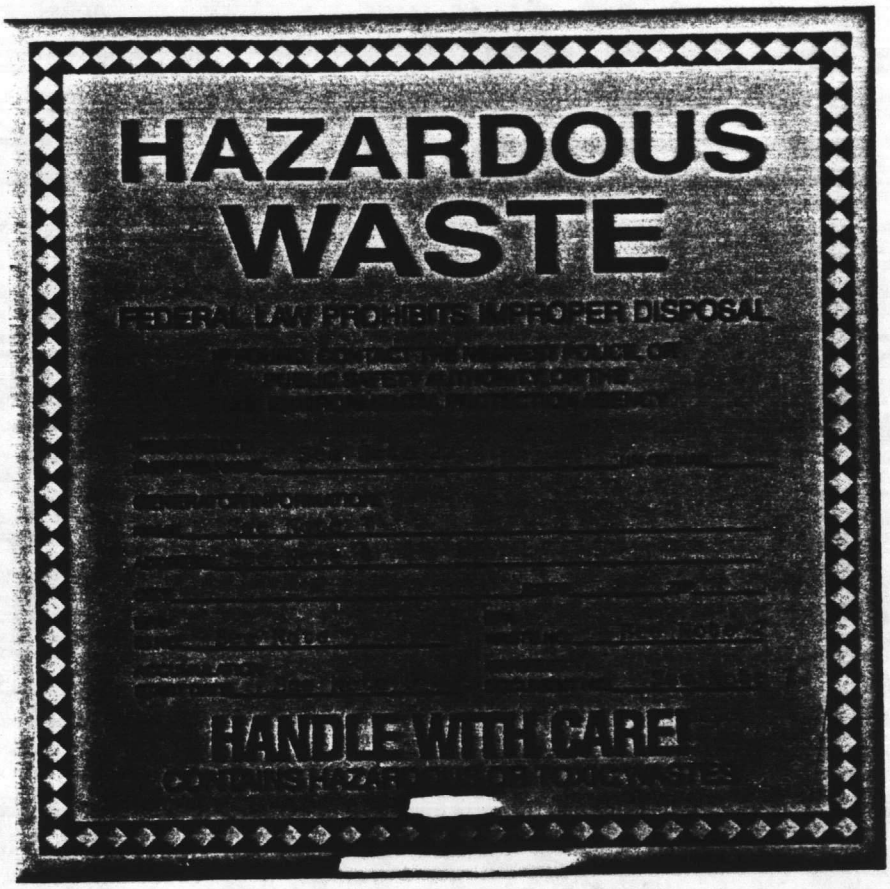
_____
HMDO Signature DATE

5. REQUEST FOR WASTE CHARACTERIZATION BY NREAD: I am unable to properly classify the above waste. NREAD assistance is requested. Cost of Laboratory Analysis should be charged to the following Cost Account Code. _____

_____
HMDC Signature DATE

Appendix A to ENCLOSURE (1)

See Note 1



Note 1: The above label or equivalent will be placed on all hazardous waste (HW) containers prior to use for storage of HW. Damaged labels will be immediately replaced, using same information as on original label. If original label illegible, contact your Hazardous Material Disposal "Officer" for guidance.

Note 2: Obtain this information from your HW Standard Operating Procedure. If not available, contact your Hazardous Material Disposal Officer.

Note 3: Enter the name of the organization having physical custody of the HW at time label placed on the container, unless replacing a damaged label. See Note 1 above.

Note 4: Enter either "MCAS, New River, Jacksonville" for HW generated aboard or by organizations stationed aboard the Marine Corps Air Station, New River. Enter "Marine Corps Base, Camp Lejeune" for all other HW generated locally.

Note 5: Enter NC 8170022570 for all waste generated aboard or by organizations stationed aboard MCAS, New River. Enter NC 6170022580 for all other HW generated within the Camp Lejeune complex.

Note 6: Enter the date that HW first placed in the container unless the facility has written authorization from CG, MCB, Camp Lejeune to operate as a HW satellite accumulation area. In which case, follow instructions provided within the written authorization.

Note 7: Leave blank, will be completed by the Traffic Management Officer, Camp Lejeune.

Appendix B to
ENCLOSURE (1)

RESPONSIBILITIES FOR HAZARDOUS MATERIAL (HM)/HAZARDOUS WASTE (HW) DISPOSAL

1. Compliance with hazardous waste management and disposal regulations requires the cooperative effort of many functions within the Camp Lejeune complex. The following outlines the responsibilities of various officers and managers relative to hazardous waste management:

a. Hazardous Material Disposal Officer (HMDO) will:

(1) Provide assistance to HW generators and handlers in the preparation and timely submittal of HW turn-in documents per BO 6240.5.

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

(3) Keep OIC's and key personnel informed of any changes in regulations affecting HW activities within the HMDO's cognizance and ensure that HW standard operating procedures (SOP) are up to date and readily available for review by personnel involved in HW management.

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

(5) Develop and provide HW Training requirements to HMDC for personnel within the HMDO's cognizance.

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

(7) Conduct surveys required to identify HW generation and storage sites within the HMDO's cognizance and provide periodic updates as questioned to the HMDC.

b. Hazardous Material Disposal Coordinator (HMDC) will:

(1) Provide assistance to HMDO's in handling HW management problems. Serve as HMDO for organizations not having sufficient HW activity to justify appointment of a HMDO.

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

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

(4) Serve as command point of contact with Marine Corps Base Environmental personnel on matters dealing with worksite HW inspections by State and Federal agencies and implementation of this Order.

(5) Develop listings of HW generation and storage facilities.

(6) Develop and provide to the Base Civilian Personnel Division (CPD) the HW training requirements of the HMDC's command.

c. Assistant Chief of Staff, Facilities, Marine Corps Base will:

(1) Have overall responsibility for implementation of the subject program and maintaining compliance with requirements of references (a) and (b) and related local, state and federal regulations.

(2) Have overall responsibility for management of pollution abatement projects per latest revision of MCO P11000.8.

(3) Have overall responsibility for local implementation of Marine Corps programs to correct environmental discrepancies associated with past HM/HW disposal sites.

ENCLOSURE (2)

(4) Ensure that plans and specifications for new facilities provide adequate facilities and collateral equipment for the handling and storage of HM/HW.

d. Director, Natural Resources and Environmental Affairs Division will:

(1) Provide a staff specialist to serve as HMDC for Marine Corps Base.

(2) Provide a command point of contact with state and federal agencies on matters pertaining to the subject program.

(3) Monitor ongoing activities as required to identify, evaluate and provide up-channel reporting of environmental deficiencies related to the subject program.

(4) Coordinate day-to-day implementation of this Order and provide the following types of technical assistance:

(a) Laboratory support, if required, for HW identification.

(b) Training to HMDC's and HMDO's on state and federal environmental laws, regulations and procedures.

(c) Guidance on HM/HW SOP preparation.

(d) Guidance on HM/HW spill preventation, control, cleanup and related HW disposal.

(e) Coordination of HM/HW recycling/minimization program.

(f) Preparation and submission of reports to regulatory agencies required by references (a) and (b).

e. Base Maintenance Officer will:

(1) Collect and dispose of used POL's and oily wastes from collection tanks and other oil pollution abatement facilities in a manner consistent with this Order and references (a) and (b).

(2) Unless otherwise provided, operate and maintain industrial waste collection and pretreatment facilities associated with base sewage collection and treatment systems.

(3) Provide HM/HW spill response services in accordance with reference (d).

f. Base Fire Chief will:

(1) Provide HM/HW spill and related emergency services per references (d) and (e).

(2) Provide routine inspections of facilities where HM/HW are stored and handled, and report all discrepancies to cognizant HMDC. Elimination of the following hazards will be stressed:

(a) HM/HW stored in defective containers or containers which are not properly marked with the chmical name, NSN (if appropriate) and hazard label of the contents.

(b) Incompatible HM/HW are stored in a manner with significant potential threat of fire, explosion, or release of toxic fumes or gases due to chemical reaction during spills or leaks.

(c) HM/HW stored in a manner likely to result in a significant discharge to the environment.

g. Assistant Chief of Staff, Logistics will:

(1) Appoint an officer to serve as HMDO for the Logistics Department.

(2) Ensure that suppliers provide hazardous material safety data sheets for all HM procured through open purchase and will provide one copy to unit ordering HM and one copy to the Base Safety Manager.

(3) Develop and implement a program to provide, on a continuing and reimbursable basis, empty containers, labels, labeling equipment, absorbents, and other HM/HW handling supplies required to implement this Order and BO 11090.1B.

(4) Provide contracting services required to dispose of HM or HW for which DRMO is not accountable.

h. Traffic Management Officer, Logistics Department, Marine Corps Base will serve as principal agent for the Commanding General on matters pertaining to HM and HW transportation, and will be responsible for:

(1) Monitoring all HW transportation for compliance with requirements of references (a), (b) and (c) and related state and federal regulations.

(2) Providing transportation services and related record keeping required for implementation of this Order and which are not available from the Defense Reutilization and Marketing Officer (DRMO) or the organization generating the HM/HW.

i. Assistant Chief of Staff, Manpower will:

(1) Develop and implement a comprehensive HW personnel training plan meeting the requirements of reference (b) and related State of North Carolina regulations.

(2) Coordinate local implementation of the Marine Corps Hazardous Material Information System, per MCO 5100.2S and provide safety data and related technical support to HMDC's, HMDO's and other cognizant officials as required to implement this Order.

j. Officer is Charge, Preservation, Packaging and Packing (PP&P) Section, 2dFSSG will provide PP&P support (in accordance with established regulations and procedures) to HMDO's, HMDC's, TMO and DRMO required to accomplish the following:

(1) Identification of type of containers and labeling required for compliance with reference (c) and this Order.

(2) Packaging of HM/HW required for safe storage and transportation during disposal per this Order.

(3) HM transportation certification required for compliance with reference (c).

k. Defense Reutilization and Marketing Officer (DRMO) will:

(1) Operate the base Long-Term Hazardous Waste Storage Facility at the TP-451 complex in accordance with state permit issued under regulations promulgated under references (a) and (b).

(2) Provide HM amd HW disposal services to organizations within the Camp Lejeune/MCAS, New River complex in accordance with DOD regulations, references (a) and (b), and related state and federal regulations.

(3) Receive and process HM/HW turn-in documents in a timely manner and provide prompt notification to HMDO's of any document not satisfying applicable turn in criteria or which contain HM/HW for which DRMO is not accountable.

(4) Maintain records of DRMO HM/HW storage and disposal activity in a manner which provides information required for preparation and timely submittal of required reports to state and federal regulatory agenciea.

(5) Keeps HMDC's, HMDO's and other cognizant officers informed of changes in DRMO policies and procedures which affect local implementation of the subject program.

1. Commanding Officers of the following Base Commands/Organizations will designate a Primary and Alternate HMDO to carry out duties outlined in 1a and 1b above: Marine Corps Engineer School; Rifle Range Detachment; Field Medical Service Support School; Marine Corps Service Support School; Reserve Support Unit; Infantry Training School; Support Battalion; Headquarters Battalion; Assistant Chief of Staff, Morale, Welfare and Recreation; Assistant Chief of Staff, Logistics, and Base Maintenance Officer within their respective commands/organizations.

HAZARDOUS WASTE TRAINING REQUIREMENTS AND GUIDELINES

1. Hazardous waste (HW) training is a specific requirement of state and federal regulations promulgated under the Resource Conservation and Recovery Act (RCRA). A review of RCRA requirements and the actual HW activity aboard the Camp Lejeune/Marine Corps Air Station, New River complex indicates that a relatively small percentage of personnel require highly specialized HW training. Generally, the requirements for the remaining personnel involved in HW management are satisfied by routine on-the-job training and related safety and fire-prevention training readily available locally. Providing this training will have minor impact on organizational commanders, in that training required is directly job related. Attachment (A) Part II outlines the minimum HW training required for all categories of employees identified in Section 2 below.

2. For the purpose of these guidelines, only those personnel directly involved in HW handling, storage and disposal will be subject to the HW training documentation requirements of RCRA. A special HW training record, i.e., Attachment (A) Part I or II (or equivalent) will be developed for the following personnel:

a. All Hazardous Material Disposal Officers (HMDO), Hazardous Material Disposal Coordinators (HMDC), and alternate HMDO's and HMDC's.

b. Defense Reutilization and Marketing Officer (DRMO) and subordinate personnel routinely involved in HW handling, storage, turn-in and disposal.

c. Deputy Traffic Management Officer (TMO) and subordinate personnel involved in transportation and related certification of HW for shipment per DOT regulations.

d. Personnel assigned to work places meeting the definition of HW generators, HW accumulation areas or satellite HW accumulation areas and involved in one or more of the following:

(1) Collection and storage of HW.

(2) Inspection, and related follow-up, of HW handling/storage areas.

(3) Response to HW spills and related emergencies.

(4) Preparation and submittal of HW turn-in documents.

3. Other activity personnel providing professional and technical support to HW management include the following:

a. Fire Protection personnel

b. Safety specialists

c. Environmental staff

d. Industrial hygenists

Preparation of Attachment (A) Part I or II for these staff specialists and emergency personnel are not required. Duties and training provided to these individuals will consist of standard position descriptions and civilian personnel records.

4. Responsibility for providing specialized HW training required for compliance with RCRA is assigned to Assistant Chief of Staff, Manpower, Marine Corps Base. The following officials are responsible for notifying Assistant Chief of Staff, Manpower, or specialized training requirements of their subordinates and other personnel as shown.

a. The DRMO for self and subordinates

b. The TMO for subordinates

c. HMDC's for personnel shown in 2d above within HMDC's cognizance

ENCLOSURE (3)

d. Director, Natural Resources and Environmental Affairs Division (NREAD) for subordinates and primary and alternate HMDC's and HMDO's.

Organizational commanders are responsible for developing and implementing training plans and procedures to provide RCRA required training and maintain records outlined in Attachment (A). Organizational commanders will ensure that all new/newly assigned personnel are provided appropriate HW training and close supervision required to comply with RCRA and applicable personnel safety fire prevention and occupational health standards. Organizational commanders will notify HMDC's of HW training requirements. Notification will include names and addresses of persons to be trained and an accurate description of the training required. HMDC and Assistant Chief of Staff, Manpower representative will coordinate the scheduling and funding of specialized HW training.

5. Records of HW training must be maintained for each employee for three years after employee transferred or terminated, except as follows: if an employee is transferred to a HW related position within the Camp Lejeune/Marine Corps Air Station, New River complex, the HW training records will be transferred to the new organization. Responsibility for maintaining official files of HW training records are as follows:

a. HMDC's will maintain records of HW training for HMDC's, HMDO's and alternate HMDC's and HMDO's within their cognizance.

b. DRMO will maintain HW training records for all employees identified in paragraph 2b above.

c. TMO will maintain HW training records for all employees identified in paragraph 2c above.

d. HW training records for all employees identified in paragraphs 5(a)-5(c) will be maintained on Attachment (A) Part I. Records of personnel identified in paragraph 5(d) will be maintained on Attachment (A) Part II. HMDO will maintain HW training records for personnel identified in paragraph 5(d) above. A copy of training records for personnel identified in paragraph 5(d) above will be maintained in HWMSOP.

PART I

RECORD OF HAZARDOUS WASTE TRAINING

1. Employee Name: _____

2. Job Title/MOS: _____

3. Name of Organization: _____

4. Date this Record Established: _____

5. Description of HW Duty: _____

6. Description of HW Training Completed:

a. Date	b. Description of Training/Trainer Name of	c. Signature and Date

Appendix A to
ENCLOSURE (3)

PART II

MINIMUM LEVELS AND RECORD KEEPING FOR HAZARDOUS WASTE MANAGEMENT ORIENTATION TRAINING

1. Name of Organization: _____

2. Description of Training: The personnel shown below were provided a minimum of one and one-half hours of on-the-job training covering the following:

a. Review of the types and characteristics of HM/HW handled.

b. Review of activity oil and hazardous substance spill preventation and contingency plan contained in BO 11090.1_.

c. Organizational procedures and policy for implementation of BO 6240.5.

d. Procedures to follow in protecting personal safety during HM/HW emergencies.

e. Review of the HW Standard Operating Procedure for the organization.

The training included question and answer session at the end of training.

3. Personnel Training Provided to:

Name of Trainee	Name of Trainer	Training Date	Trainer/Trainee Signatures

Appendix A to
ENCLOSURE (3)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

4WD-RM

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
~~AUG 14 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

8/4/86
Date

14. Concurrence

Beverly J. Foster for
John C. Lark, Jr., Chief
East Unit, Waste Compliance Section
8/4/86

Allan E. Antley
Allan E. Antley, Chief
Waste Compliance Section

Attachments

GENERATOR INSPECTION FORM - PART 262

USMC Camp Lejeune NC[redacted]6170022580 Onsl
Name of Site EPA I.D. Cour

Jacksonville 6-26-86 David H. Ellis
Location Inspection Date Signature of Inspector

Julian Woolen
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 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 manifest at permitted storage list
- TMO signs Safety Kleen manifest as generator, personnel have no formal training conducted recently no training plan, no contingency plan, one individual signing the manifest had received no training
- Building 909 - weekly inspections have not been perfo there is no backup inspector (262.34 a(1))
- No accumulation dates or hazardous waste label on drums of eletrolyte solution drained from batteries. 26 (a)
- Batteries drained are stored inproper, batteries stored upside down on pallets
- All generating sites — inadequate personnel traini no personnel training plan and no contingency plan this violates 262.34 (a)(4)

CONTAINER/TANK INSPECTION FORM - PART 265

USMC Camp Lejeune | NC 6170022580 | 6-26-86

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 Ignitable Or Reactive Waste (265.198)
   - ___ properly stored (a)(1)(2)(3)
   - ___ buffer requirements (b)

6. Special Requirements For Incompatible Wastes (265.1
   - ___ properly stored (a)
   - ___ tank washed (b)

REMARKS: _____

TRANSPORTER INSPECTION FORM - PART 263

USMC Camp Lejeune NC6170022580 Onslow
Name of Site EPA I.D. County

Jacksonville 6-26-86 David L. Elliott
Location Inspection Date Signature of Inspector(s)

Compliance Signature of Facility Contact

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)
   ___ immediate action (a) NONE
   ___ notification (c)(1)(2)
   ___ water transporter notification (d)

7. Discharge Clean-Up (263.31)
   ___ remedial action NONE

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