FILE FOLDER

DESCRIPTION ON TAB:

6240/1 HM/HW

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

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

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



VOL II

JAN 0 2 1987

61

6280 FAC MAR 2 / 1987

Mr. Arthur G. Linton Regional Federal Facilities Coordinator Federal Facilities Compliance Program U.S. Environmental Protection Agency, Region IV 345 Courtland Street Atlanta, Georgia 30365

Re: 1987 Federal Facilities Environmental Compliance Profile

Dear Mr. Linton:

We have received the Compliance Profile for 1986 which was enclosed in your letter received March 9, 1987. The information regarding compliance status for 1987 is current on that enclosure.

If further information or assistance is required, please contact Mr. Bob Alexander, Marine Corps Base Environmental Engineer, at (919) 451-3034.

Sincerely,

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

Blind copy to: EnvEngr NREAD UBCOM S

1987 A & 1987

ur, Arbor G. Ribto Aschanzi Federal Reoti ricu Concentor Polatei Froditices Compliance Promoto 1,9. Monitice offel Pro Estion Remove Reol. W 365 Courtiand Etress Science Courtiand Stress

at particular factors fraction as Environmental

Sead if int real

He have techies the Constance Profile (or 1986 which way equided in your interformation Ander 9, 1989, the information recerving quaritance relates for TSP / is concrete on that helpere

16 furthei internetion - mariekade is routred, Fledar Contrict Me. 808 Alexander, MariatelCores Each Favirental Englaces, at ((19) 231.3132

State Shite

T.J. DALSEL ("Slead, Bis, Astics Corps assistable Cold Starf, Cacilities (y sitestelon of the Cost main) Galeral

> Thid copy tot: "Tyedat WHEAD



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV 345 COURTLAND STREET ATLANTA, GEORGIA 30365

Commander United States Marine Corps Marine Corps Base Camp Lejeune, NC 23542 ATTN: Mr. Bob Alexander

Dear Sir:

We are presently updating our Federal Facilities Environmental Compliance Profiles for 1987. In order to do this in the most effective manner, I am requesting your assistance. Enclosed is a copy of your facility's 1986 Environmental Compliance Profile sheet and a guidance sheet. Please provide up-to-date information, particularly as to whether the facility is "in compliance," or "out of compliance". If "out of compliance," indicate: (1) reasons for "non compliance," (2) dates of latest inspections and notices of violations, (3) whether permits are current, (4) basic information regarding required actions necessary by your facility to achieve and to meet compliance goals.

If you are in doubt about your status, contact the appropriate state office having jurisdiction over your facility or this office.

We would appreciate having this information by March 27, 1986, or sooner if possible. If you have any questions concerning this request, please call me or Mr. David Holroyd of my staff at (404) 347-3776 or FTS 257-3776.

Your assistance in this effort will assure our success in producing a quality environmental compliance document for 1987.

Sincerely yours, D send dened

Arthur G. Linton, P.E. Regional Federal Facilities Coordinator Federal Facilities Compliance Program Environmental Assessment Branch Office of Policy and Management

Enclosures



DATE: September 1986

NAME: Marine Corps Base, Camp Lejeune

LOCATION: Onslow County, North Carolina

I.D.: NC170022580

MISSION: To provide training facilities, logistical support housing, and certain administrative support for Fleet Marine Force Units and other units assigned; to conduct specialized U.S. Marine Corps Schools as directed.

AREA: 87,000 acres (112,000 acres with water areas)

POPULATION: 75,000

COMPLIANCE STATUS

- AIR: In compliance; state inspected January 31, 1986.
- WATER: In compliance. All systems are in compliance with THM standards. Ongoing study of groundwater quality will evaluate all water supply wells and sources of suspect/detected pollution.
- WASTEWATER: In compliance; NPDES permit is being renewed. Major construction improvements are nearing completion at Courthouse Bay and ready for ground-breaking at Hadnot Point.
 - RCRA: Out of compliance. A storage permit was issued by the state on September 7, 1984. Inspection of June 26, 1986, indicated other violations.
 - CERCLA: Notification has been filed. Phase I studies are complete. Phase II studies of 22 sites base-wide plus the Hadnot Point groundwater aquifer are being studies in 1986 under a Navy contract. Following contract negotiations in April 1986, milestones will be defined for characterization of pollutant extent. Feasibility Report for remedial measures will be completed in 1987.
 - TOXICS: In compliance; PCB's managed via Defense Logistic Agency contract.



Page 2 U.S. Marine Corps Base, Camp Lejeune

ACTION NEEDED

Intensive groundwater monitoring program under CERCLA/RCRA is needed to locate sources of contanination and lead to corrective action.

CONTACT: Bob Alexander - FTS/ 676-3034/3035



DATE:

NAME :	(Please	Furnish)

LOCATION: (Please Furnish)

I.D.: EPA will Furnish

MISSION: (Please Furnish)

AREA: (Please Furnish)

POPULATION: (Please Furnish)

COMPLIANCE STATUS

- AIR: Is facility in compliance with Air Regulations? When was facility last inspected by EPA or state?
- WATER: Is facility in compliance with drinking water quality standards? Is water obtained from wells or municipal system? Treated?
- WASTEWATER: Is system in compliance? Is permit current and when does it expire? Type of treatment system or systems? Miscellaneous point sources? Last date of Inspection by EPA or state? Findings?
 - RCRA: Is facility in compliance? Has Part A submitted? Has Part B been called? Is the facility in compliance with interim or final regulations? Has any construction of storage facilities been planned? Date of last EPA or state inspection? Findings?
 - CERCLA: Has Notification been filed? Has Phase I report been completed? Has Phase II been started? Give phase of program and major findings.
 - TOXICS: Are PCB's or other toxicants handled? Give disposition.

PROBLEM AREAS

List major problems in Air, Water, RCRA, and CERCLA programs.

ACTION NEEDED

Site any action needed.

CONTACT NAME AND PHONE NUMBER: (Please Furnish)



HEA Fill 1 A 1987 Hg Norte ies Ass From: To: Juw -H.c Subj: ction Atte answerd 66's note indicating ~ are toking corrective action and will have to respond to strate of N.C. letter when it connes. No response required on this letter. J Dalsell m



HEADQUARTERS, MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA

DATE / May 1987

From: Assistant Chief of Staff, Facilities To: DIMECTOR NREAD

Subj: H.w.

Attached towarded for action as appropriate. I have answered LG's note indicating we are toking corrective action and will have to respond to strate of N.C. letter when it commes. No response required on this letter.

INSPECTION REPORT

M. Delsell M





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV 345 COURTLAND STREET ATLANTA, GEORGIA 30365

APR 2 8 1987 4WD-WC

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

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

Dear General Cassity:

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

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

Sincerely yours,

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

Enclosure

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

FACILITIES HELP 1 MAY 1 19

APR 2 8 4637

Central (40°), Labority Constanting Collection La Contration Completions Contrations (Konstructions) 25597 2007

BULLE COMPANY PERMIT PROPERTY AND ADDRESS AND ADDRESS

THO HE CONTRACTOR MADE OF A TATE OF A

With a contract of the cost

ATTO AND APPROVED OT A

Carl and Martine training and

De Maerde 21 ond Should 2017/2012 and Ecoexcitice on a colorida of an Gerechtler sector Gaug Lene de 1 for data compensation and a construction of the construction reaction fraction of the construction and construction of the construction of the construction of the construction and construction and the construction of the construction in the for construction second card construction and construction of the construction in the for construction.

rtho and Anticas Discrizing dorder, the Lastrongen will the proprese Lastron to expect to the Werland to the Company of World Electrony of the Augure . They are should have by the Elecent of Erese concerns there in this on the ABU/Test of the

A POLOVINI STORE

nort to tank this, dues each other tanks a pillance from in

91. O. 1909

dates a financial manufactor a bilar action and and and and and and



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV 345 COURTLAND STREET ATLANTA, GEORGIA 30365

APR 2 8 1987

4WD-WC

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

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

Dear General Cassity:

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

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

Sincerely yours,

an

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

Enclosure

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

APR 2 5 403

Jeneral 14€ - CasSto Conaversi 41 Clart di Conaversi 41 Clart di Cator 14 Petron Alerta (1904) - 25040 -001

WELL I UTLA THE ISTORY INCOMENTATION AND AND AND THE PARTY

and a state of the state of the state of the

(a Market 21) and there (21, 21) which is discounted to a constant of the sector dutackless Cleap Least are in the sector area with the Last backfulle of the product area the interaction to be presented to the choice area of the the sector of the construction reason. The need are trended on the choice area of the discourse interaction the sector. The need are trended on the choice are backfulle and a to be the construction are not the construction.

UNITED AND SERVISON ACTIVES OF CONTRACTS IN

nte akoketorak titumlutikai darimi, ter lautoritkan ekilise tori keep ordaa tehtetoria isteken tertika (eksport) Marti kubulets of 1938 Aymeri. 15 year Mandel Indo ango tertika (eksport) Marti kubulets of 1938 Aymeri. 1840 Av. 1933

A PROVING AND TRADE

rote (... early, P.E., Olds) Post Pole, Lange e spliane (kurion -

ante da tria

data and fartal exacts is diplot a three pattern produced inco

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, North Carolina 28542 NC6 170 022 580

3. Responsible Official

Danny Sharpe Head of Soil, Water and Environmental Branch

4. Inspection Participants

David Ellison, U.S. EPA Richard Gay, North Carolina Solid & Hazardous Waste Management Branch Scott McPhiliamy, U.S. EPA (Region III) Winston Weiser, U.S. GAO Danny Sharpe, USMC Julian Wooten, USMC Sammy Gwynn, USMC Glenee Smith, USMC Ken Warren, USMC

5. Date and Time of Inspection

March 31 and April 1, 1987 8:30 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. This inspection is to determine the USMC's compliance status with the permit conditions, generator standards and transporter standards.



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, 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 March 31 and April 1, 1987, EPA conducted an inspection of the USMC, and was accompanied by the State inspector and members of the GAO task force, who are overviewing the quality of RCRA inspections. The USMC is a permitted facility for storage in containers, a generator of hazardous waste and a transporter of hazardous waste.

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 transportion of hazardous waste.

Hazardous waste is generated at approximately 100 sites (facility was unsure of actual number) and then transported by TMO to the permitted storage area. Attached is a list of the generators (the first three pages are resposible officer at each site and the last three pages are generating sites). The list is approximately 85 percent complete.

The permitted storage area has two areas for storage of hazardous waste, building TP-451 and TP-463. The capacity in 55 gallon drums of the storage areas are: 224 drums in TP-451 and 504 drums in TP-463. 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: (B = building number) 2d Lav Battalion, sites B429, B1750, and B1755; 2d Amtrac Battalion, sites BA2, BA47, BA47, BB6 and BA1; 8th Marine HQCO, sites BTC-774 and B712; Marine Corp Service Support Schools, sites BM119 and BM191; 2d Maint Battaloon, sites B1601, B909, B901 and B902; and 2d Supply Battalion, site B915.

The USMC generates a large quantity of batteries (lead-acid, magnesium and lithium). The lead-acid batteries are recycled and the acid may be occassionally drained, if the battery is cracked. The USMC no longer stores batteries uncovered on pallets, upside down us noted in the last inspection. The magnesium and lithuim batteries are not recyclable and are disposed as a waste.



Safety-Kleen currently services 70 sites where hazardous waste is generated. TMO is responsible for signing the manifest as the generator at the various locations. The USMC is currently considering the possibility of Safety-Kleen servicing an addition 50 locations.

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, Camp Geiger and Camp Johnson to the Camp Lejeune permitted storage buildings. Only the USMC New River Base is required to have a separate EPA I.D. number.

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 capacity at the four storage areas is as follows:

Building 45 - 273,370 gallon tank Holcomb Blvd. - 3 tanks 17,585 gallons each, 1 tank 30,000 gallons Air Station - 3 tanks 30,000 gallons each Tarawa Terrace - 6 tanks 30,000 gallons each

The USMC furnished historical analysis for all the waste oil tanks. The waste oil is a hazardous waste due to the high levels of halogenated solvents and being EP Toxic for lead. The USMC has recently sampled the tank at building 45 and will furnish this data to the State and EPA. The waste oil in all tanks should have a hazardous waste determination conducted on the waste oil currently stored.

The USMC performs the opening burning and detonation of waste explosives at two locations. The USMC and not notified or obtained interim status for this activity.

The Assistant Chief of Staff of Facilities, Colonel T.J. Dalzell, was briefed on the findings of the inspection. Attached is a copy of the inspection checklist and pictures taken during the inspection. The following violations were identified at the inspection on June 26 and 27, 1986 and have not been corrected, in addition they are violations of the State Compliance Order:

<u>40 CFR 262.34(a)(4)</u> - For a generator of hazardous waste the facility must comply with the requirements of 40 CFR 265.16, for personnel training. The facility has failed to train all personnel at TMO who are responsible for the Safety-Kleen sites.

40 CFR 264.16 - The permit condition in Part I F, requires the USMC to revise any plans that change. The facility has failed to revise the training plan to indicate the addition personnel trained and who need training at DRMO. The facility has failed to train a backup to Nadine Hipp at DRMO.



<u>Permit Condition - Part III Container Storage</u> - The permit requires drums be stacked no higher than two high. At the permitted storage area, boxes were stacked higher than the equivalent of two drums (approximately 7 feet maximum).

In addition, to the above violations that have not been corrected the following violations were identified:

<u>Permit Condition - Part I F.</u> - Any revision to any plans or documents that is required by the permit must be submitted as a permit modification. The USMC has failed to submit changes in plans for the new base order developed, and for the name change of building TC-863 to TP-463.

<u>40 CFR 264.16(c) - Personnel Training</u> - The personnel at DRMO have failed to receive an annual review of the training required in 40 CFR 264.16(a).

<u>40 CFR 264.74(a)</u> - DRMO the operator of the permitted storage area could not provide records required to be maintained in the Part B permit. The records were reviewed at the Environmental Affairs Office, the USMC, the owner of the facility.

<u>40 CFR 262.11</u> - The USMC has failed to make a hazardous waste determination at all generators; the USMC could not furnish a complete list of all generators. At the 2d Amtrac Battalion an inappropriate hazardous waste determination was made for the dry cleaning solvent. This same situation may be occuring at other locations. The USMC has failed to make a hazardous waste determination for all the waste oil tanks on base.

<u>Permit Condition - Part II L. 3.</u> - This special condition requires the Base Fire Chief to annually review the contingency plan and types of wastes located in the hazardous waste storage facility with representatives of the Naval Hospital and Base Provost Marshall. The USMC could not provide documentation that this review has taken place.

40 CFR 262.34(a)(1) - A generator of hazardous waste, who accumulates waste for less than 90 days must comply with 40 CFR 265 Subpart I. The USMC has failed to transfer the contents of a dented container at site A-1 of the 2d Amtrac Battalion as required by §265.171.

40 CFR 262.34(a)(3) - A generator of hazardous waste, who accumulates waste on-site for less than 90 days must label or mark clearly each container with the words, "Hazardous Waste". Two drums at site A-1 at the 2d Amtrac Battalion were not labeled with the words, "Hazardous Waste".



40 CFR 262.34(a)(4) - A generator of hazardous waste, who accumulates waste on site for less than 90 days must comply with 40 CFR 265.16. Danny Sharpe and personnel at 8th Marine HQCO have not had an annual review of training as required by §265.16(c). Personnel conducting training at the generators have not been trained as required by §265.16(a)(2).

<u>3005(e) of RCRA</u> - The USMC has failed to notify or obtain interim status for the thermal treatment activity for the opening burning and detonation of waste explosives.

10. Conclusions

The condition of containers and handling of hazardous waste at the permitted storage area was excellent. The major problem at the permitted storage area was the training of personnel.

The generators of hazardous waste at the USMC have made great improvements since the last inspection, especially 2d FSSG. Many of these improvements are as result of the new Base Order. The USMC still has a complex situation at the generating sites with training personnel, management of waste generated and maintaining paper work. Many problems may be eliminated, if the USMC can increase the number of sites that is serviced by a contractor who handles the solvents.

The USMC needs to handle the waste oil that has been generated as hazardous waste and and sample all waste oil to make a hazardous waste determination. The recent sampling on the waste oil tank at building 45 should be submitted to the State and EPA.

11. Recommendations

The USMC needs to research and determine how solvents are being detected in the waste oil. The USMC will be required to handle the waste oil as a hazardous waste until the base can document the waste oil is not hazardous.

The inspection logs maintained by each generator should indicate how discrepancies are resolved. In addition, an inspection log should be developed for each generating site, not one log for several sites.

12. Signed

David G. Ellison, Inspector

4-15-87

Date



Approval

John C. Lank, Jr., P.E. Chief East Compliance Unit $\frac{4/25/87}{Date}$

a

Allan E. Antley, Chief Waste Compliance Section

4/28/87 Date



TSDF INSPECTION FORM - PART 264

1

Jacksonville, NC	3-31-87 Dina x 200000	
Location Ins	spection Date Signature of Inspector(s)	
Compliance Date	Signature of Fagility Contact	
An inspection of your facility has been made thin below with a cross (X).	is date and you are notified of the violations, if any, marked	
C = com	pliance	
SUBPART B - GENERAL FACILITY STANDARDS	SUBPART C - PREPAREDNESS AND PREVENTION	
. Required Notices (264.12)	8. Required Equipment (264.32)	
foreign shipments (a) NA	C communication/alarm system (a)	
Left-site notification (b)	C telephone or two-way radio (b)	
TUA new owner/operator (c),	C fire, spill, and decontamination equipment (c)	
	C adequate pressure and volume of water/foam	
. General Waste Analysis (264.13)	equipment (u)	
<u>C</u> chemical/physical lab reports (a)(1)	O Testies and Maintanana (5 di ana (oct pa)	
<u>C</u> review/repeat of analysis (a)(3)(4)	9. Testing and Maintenance of Equipment (264.33)	
<u>C</u> inspect/analyze (a)(4)	s required	
<u>C</u> analysis plan (b)(c)		
	10. Access to communications or Alarm System (264.34)	
. Security (264.14)		
(The facility may be exempt under (a)(1)(2)	11 Developed Atribuits (act act)	
<u>C</u> 24-hour surveillance system (b)(1)	11. Required Aisle Space (264.35)	
or	<u>C</u> per permit condition	
<u>C</u> artificial/natural barrier (b)(2)(i)		
and	12. Arrangement with Local Authorities (264.37)	
<u>C</u> entry control (b)(2)(ii)	C of changes with wastes characteristics (a)	
<u>C</u> danger sign(s) (c)	$\underline{\mathcal{C}}$ documentation of refusal (b)	
. General Inspection Requirements (264.15)	SUBPART D - CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
C inspect for malfunctions, operator errors,		
discharges, etc. (a)(1)(2)	13. Amendment of Contingency Plan (264.54)	
<u>C</u> inspect monitoring, safety and emergency	X permit revision (a) Add NEW BASE DRDE	
h written schedule (b)(2)(3)	<u>C</u> emergency failure (b)	
C remedial action (c)	<u>c</u> facility design change (i.e. construction	
<u>C</u> inspection log (d)	coordinators change (d)	
	C equipment change (e)	
Personnel Training (264.16)		
★ program completed (a)(1)(b)	14. Emergency Coordinator (264.55)	
🗴 annual review (c)	¢ on call	
X documents/records (d)(e)	C authority to commit	
General Requirements for Ignitable, Reactive or Incompatible Waste (264.17)	Revisions to Permit	
<u>C</u> proper handling/"No Smoking" signs (a)(b)	■ name change TR 863 to TP-463	
C- documentation (c)	en a sette de la companya de la comp	

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



```
15. Emergency Procedures (264.56)
      C activation of alarm system (a)(1)
      <u>C</u> notification to State/Local agencies
of discharge (a)(2), (d)(1){2)
      C hazard assessment (c)
     C reasonable prevention measures (e)
     C monitor for leaks, pressure buildup,
         etc. (f)
     C proper management of recovered waste,
         contaminated soil or surface water (g)
      C compatibility with contaminated areas (h)(1)
      C emergency equipment cleaned (h)(2)
      C notification of compliance (i)
      C written report (15 days)/operating
         record notation (j)
 SUBPART E - MANIFEST SYSTEM, RECORDKEEPING
 16. Use of Manifest System (264.71)
     c sign, date (a)(1)
     c note discrepancies (a)(2)
     C copy to transporter (a)(3)
     C copy to generator (30 days) (a)(4)
     C TSDF copy (a)(5)
    NA rail or water transporter (b)(1)(2)(3)(4)(5)
     C generator compliance (c)
 17. Manifest Discrepancies (264.72)
     C bulk discrepancies (a)(1)
     G batch discrepancies (a)(2)
     C written report, if required (b)
18. Operating Record (264.73)
     C written (a)
     C quantity, handling methods, dates (b)(1)
    C location/quantity with cross reference (b)(2)
    C waste analysis (b)(3)
    C incident reports (b)(4)
    C inspection record (b)(5)
    C monitoring, testing results (for
        incinerators) (b)(6)
7^{c} of x notice to generators (b)(7)
    NA closure/post closure cost (b)(8)
19. Availability, Retention, and Disposition of Records (264.74)
    A access to records (a) NOT AT DRMD
    C retention (b)
    NA records submitted (c)
20. Annual Report (264.75)
    C submit by March 1 (a)(b)(c)(d)(e)(f)(g)(h)
```

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

- 21. Unmanifested Waste Report (264.76) _____ within 15 days (a)(b)(c)(d)(e)(f)(g)
- 22. Additional Reports (264.77) <u>C</u> Section 264.56(j) report (a) <u>C</u> facility closure (c)

SUBPART G - CLOSURE AND POST-CLOSURE

- 23. Closure Plan; Amendment of Plan (264.112)
 <u>c</u> written (a)
 <u>c</u> inventory modification (a)(2)
 <u>c</u> amendment (b)
 - c 180 day notice (c)
- 24. Disposal or Decontamination of Equipment (264.114) C equipment disposal/decontamination
- 25. Post-Closure Plan; Amendment of Plan (264.118) _____written (a)
 - _____ amendment/modification (b)(c)
- SUBPART H FINANCIAL REQUIREMENTS NA
- 26. Cost Estimate for Closure (264.142)
 - written (a)
 - _____ anniversary adjustment (b)
 - ____ change adjustment (c)
 - ____ avai able 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
- Incapacity of Owners or Operators, Guarantors or Financial Institutions (264,148)
 - _ compliance (a)(b)

2


Name of Site NC 617 0022580 Inspection Date SUBPART J - TANKS NA SUBPART I - USE AND MANAGEMENT OF CONTAINERS 1. Condition of Containers (264.171) 1. General Operating Requirements (264.192) C leakage incompatible materials (a)(1)(2) C past leakage (evidence) overfilling prevention (b)(1)(2) C severe rusting C structural defect 2. Inspections (264.194) overfilling control equipment (daily) (a)(1) 2. Compatibility of Waste with Containers (264.172) monitoring data (daily) (a)(2) C visual evidence of noncompliance uncovered tank level (daily) (a)(3) (leakage, corrosion) ____ above ground construction materials (weekly) (a)(4 surrounding area (weekly) (a)(5) 3. Management of Containers (264.173) assessment of tank condition (b) C closed (a) spill response procedures (c) C improper handling or storage (b) 3. Closure (264,197) residue removal 4. Inspections (264.174) C weekly (minimum) decontamination 5. Containment (264.175) 4. Special Requirements for Ignitable or Reactive Waste (264.198)"With Free Liquids" C base (free of cracks or gaps) (b)(1) recently sealed cracks _____ improper storage (a)(1)(2)(3) buffer (b) C run-on prevention (b)(4) C removal of spilled or precipitation (b)(5) 5. Special Requirements for Incompatible Waste C protect (c) (264.199)mixing (a) "No Free Liquids" unwashed tank (b) Contact with accumulated liquids (c)(2) 6. Air Emissions (264.200) 6. Special Requirements for Ignitable or Reactive Waste _ proper control equipment (a)(b)(c) (264.176)C 15m (50 ft) 7. Special Requirements for Incompatible Waste (264.177) Capacity TP-451 - (224 drum) Capacity TE-863 - (504 drums) X drums not over two high C Aisle Space (4ft between rows, 1ft walls and C mixing (a) C unwashed container (b) c. separation (c) REMARKS: PERMIT Conditions 5ft infront of curbs)



NC6/70022580 EPA I.D. Name of Site CampLejeune Jacksonville, NC 3-3/-87 Inspection Date Compliance Date 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 SUBPART C - PRE-TRANSPORT REQUIREMENTS 1. Hazardous Waste Determination (262.11) 7. Packaging (262.30) & Subpart D waste (b) waste identified to Fool C D.O.T. compliance Subpart C waste (c)(1)(2) waste streams all it is actually DOOL generators not identified 8. Labeling (262.31) 2. EPA Identification Numbers on alist (C D.O.T. compliance EPA generator number (a) EPA transporter/facility (c) 9. Marking (262.32) C D.O.T. compliance (a) C "HAZARDOUS WASTE" label (b) SUBPART B - THE MANIFEST 10. Placarding (262.33) 3. General Requirements (262.20) D.O.T. compliance C proper manifest (a) c permitted facility (b) 11. Accumulation Time (262.34) Y Subpart I; J (a)(1) **C** accumulation date (a)(2) * "Hazardous Waste" (a)(3) 4. Required Information (262.21) Subpart C; D (a)(4)* 200 pertaining to list C document number (a)(1) X personnel training (a)(4)* of generating sites C generator identification (a)(2) 262.11 ______ transporter identification (a)(3) *Cite specific violations of 40 CFR 265 under remarks C facility identification (a)(4) C D.C.T. description (a)(5) total quantity (a)(6) SUBPART D - RECORDKEEPING AND REPORTING C certification (b) 12. Recordkeeping (262.40) 5. Number of Copies (262.22) C manifest retention (a) C minimum number <u><u></u> annual/exception report (b)</u> <u>C</u> test/waste analysis (c) 6. Use of the Manifest (262.23) C generator handwritten signature (a)(1) _____ transporter signature/date (a)(2) C retain copy (a)(3)

copies to transporter (b)

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



- 13. Annual Reporting (262.41) <u>C</u> submitted (a)(1-6) <u>C</u> submitted (b)
- 14. Exception Reporting (262.42) <u>L</u> transporter contact (a) <u>E</u> exception report (b)(1)(2)

REMARKS:

EOD Activities for the base has not been addressed
and it should by had interim status.
Subject I 7262.34(R)(i) 265.171 - DENTED DRUM AT 22 Amtras BN stelle AL
262,34 (a) (3) - No hazardous waste lakel on two drams
at 2d Amtrac BN at site Al
- 265.16 - no training for Danny Shanpo. The training
-10 doo 262.11 training for individuals who give training at unit
"abs. #1 - list of generators (to maintain the' operation
of the base

DHS FORM 3010 (Rev. 9-E3) SOLID & HAZARDOUS WASTE



NC6170022580 ns/ow County USMC Camp Legeuns Location 3-3/-87 Inspection Date ignature of Inspector(s) Compliance

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

- 2. Transfer Facility Requirements (263.12) <u>C</u> 10 days limit within buse Furth SUBPART B - MANIFEST SYSTEM/RECORDKEEPING
- 3. The Manifest System (263.20)
 - <u>C</u> generator signature (a)
 - <u>C</u> transporter signature/date/copy (b) <u>C</u> accompanying manifest (c) <u>C</u> delivery compliance (d)(1)(2)(3) <u>NA</u> bulk shipment-water (e)(1)(2)(3)(4)(5) <u>NA</u> rail shipment (f)(1)(2)(3)(4) <u>NA</u> foreign shipment (g)(1)(2)(3)
- 4. Compliance With The Manifest (263.21)
 <u>C</u> designated facility delivery (a)(1)
 <u>C</u> alternate facility delivery (a)(2)
 <u>C</u> designated transporter delivery (a)(3)
 <u>C</u> designated foreign facility (a)(4)
 <u>C</u> generator contact (b)

DHS Form 3010 (Rev. 9-83) SOLID & HAZARDOUS WASTE SUBPART C - HAZARDOUS WASTE DISCHARGES

6. Immediate Action (263.30) Now -

- ____ immediate action (a)
- ____ notification (c)(1)(2)

____ water transporter notification (d)

7. Discharge Clean-Up (263.31) NONE remedial action

REMARKS: DNLY Problem note the 201



SUBPART I - USE AND MANAGEMENT OF CONTAINERS

- 1. Condition Of Containers (265.171) C leakage _C past leakage (evidence)
 - C severe rusting
 - X structural defect
- 2. Compatibility Of Waste With Containers (265.172) C visual evidence of noncompliance (leakage, corrosion)
- 3. Management of Containers (265.173) C closed (a) C improper handling or storage (b)
- 4. Inspections (265.174) OFX weekly (minimum) ONLY RECOMMEND IN LOGS CHANGES IN LOGS
- 5. Special Requirements For Ignitable or Reactive
- Waste (265.176) C 15m (50 ft)
- 6. Special Requirements For Incompatible Waste (265.177)C mixing (a) C unwashed container (b)
 - C separation (c)

SUBPART J - TANKS NA

- 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:	T	anks	- noh	at	base	Current	Hy	- but	it is	Dossible	
	t	hat	waste	oil	tanks	may	bo	a haza	rdous u	saste	
						لىرى ئىرى	Andre and				-

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



NAME OF ORGANIZATION	HAZARDOUS MATERIAI PRIMARY	L DISPOSAL OFFICER ALTERNATE
Natural Resources & Environmental Affairs Division	Sammy Gwynn Phone: 5003/2083 Bldg 1103 Coordinator for base	Glange Smith D anny Sharpe 5003/2083 1103 .
Marine Corps Engineer School	Maj Ferral Phone: 7570/7275 Bldg:	lstLt G L McNutt 7528/7233
Rifle Range Detachment	1stLt O'Hara Phone: 7510 Bldg:	GySgt J V Adams 7510
Field Medical Service School	Lt C W Hansen III Phone: 0826/0915 Bldg:	HM1 C H Schroeder 0742/0892
Marine Corps Service Support Schools	1stLt R D Rule Phone: 0973/0839 Bldg: M131	MSgt Beckly 0710/0738 M119
Reserve Support Unit	Capt M J Stroff Phone: 3144/1790 Bldg:	MSgt Butcher 3144/1790
Infantry Training School	WO F L Cote Phone: 0378 Bldg:	GySgt Gladden 0200
Support Battalion	MSgt D S Keifer Phone: 5247 Bldg: 1011	Sgt Amrine 5247 1011
Headquarters Battalion	Capt Gander Phone: 3852 Bldg: 12	GySgt J L Spann 3852/1079 12
Assistant Chief of Staff, Morale, Welfare & Recreation	D Parker Phone: 2135/2537 Bldg:	D E Raynor 2819
Assistant Chief of Staff, Logistics	Capt Peters Phone: 2536 Bldg: 1116	GySgt Burleson 2536 1116
Base Maintenance Division	D K Bullock Phone: 5300 Bldg: 1202	S Marsicano 5307/3722 1202

Ruse



REVISED 30 MARCH 1987

21 7556

ANGLICO		MEDICAL BN	
LT LEVIN SGT MILLER	1481 5212	LT ROCKFORD HM1 TREVONO	1930 1930
8thCOMM		RADIO BN	
W.O. FLETCHER SGT TORRES	2923 1072	LT PFAFF SSGT SHERMAN	5114 5114
8thENG		RECON. CO	
MAJOR KOPER SSGT BOSHEARS	2622 1072	GYSGT WAGNER GYSGT NIXON	3545 1664
	• • • •		
HQSVCBN		SUPPLY BN	
SSGT BRADSHAW PFC McMANN	2622 1693	WO.O. CLAY SSGT HOWELL	3405 3418
LSB		8thMT	
CAPT MYERS SSGT CASSOU	3256 3754	SSGT COX CPL D.T. BOOKER	1684 1892

MAINT BN

CAPT	ALSTON	5222
SSGT	OZUNA	5222



		20 Mourie Divo-
UNIT	HAZARDOUS MATERIAL PRIMARY	DISPOSAL OFFICER ALTERNATE
2d Mar Regt	Capt J Fechteler Phone: 3404 Bldg: HP-100	Sgt T Hutzell 3404 HP-100
6th Mar Regt	Capt W E Hetzel Phone: 3476 Bldg: 1206	MSgt D Godwin 3476 1206
8th Mar Regt	Capt Sholar Phone: 0221/0153 Bldg: TC 341	GySgt Tindall 0221/0153 TC 341
10th Mar Regt	Capt W Gordy Phone: 3165 Bldg: 1707	GySgt C E Lee 3165 1707
HQ Bn	Capt K Hulet Phone: 3296/3524 Bldg: 317	GySgt J Savage 1434 HP-301
2d CEB	2dLt L DL Sjelin Phone: 3993 Bldg: 417	SSgt P Marks 3993 417
2d Tank Bn	Maj T Cornell Phone: 3861/3725 Bldg: 407	MGySgt Sloan 3861/3725 407
2d AAV Bn	Lt M D Parker Phone: 7586 Bldg: BB-5	MGySgt R D Clodfellter 7586 BB-5
2d Recon Bn	Capt L G Flores Phone: 7124/7530 Bldg: BD-102	GySgt W Dean 7124/7530 BD-102
2d LAV Bn	Lt Gonzales Phone: 2301/1477 3305 Bldg: 1750	Gygt Stokes 2301/1477 1843/1992 1750



MARINE CORPS BASE

SPECIAL SERVICES & MARINE CORPS EXCHANGE

SITE	#1	BLDG. #1103	AUTO HOBBY SHOP
	#2	" 1120	n ³ n n
	#3	BLDG. #TC-470	п п п
	#4	BLDG. #BB-71	п п п
	#5	BLDG. #1916	GOLF COURSE MAINT
	#6	BLDG. #31	GOTTSCHALK MARTNA
			BOAT HOUSE
	#7	BLDG. #1611	HADNOT POINT SERVICE
			STATION
	#8	BLDG. #TT-2453	SERVICE STATION
	#9	" #AS-410	" "
	#10	" #BB-177	п п
	#11	BLDG. #25	LAUNDRY & DRY CLEANING
			SHOP
		HEADQUARTERS BN MCB	
SITE	#1	BLDG. #11 ;	ARMORY
		BASE MAINTENANCE	
SITE	#1	BLDG. #AS-122	MAINT & REPATE DTV
	#2	BLDG. # 1102	
			PAINT SHOP
	#3	BLDG. # 1202	GENERAL TRADES BRANCH
			ELECTRICAL SHOP
	#4	BLDG. # 1700	UTILITIES DIV, STEAM
			GENERATION
		FIELD MEDICAL SCHOOL	
STUE	#1		
STIF	#1	BLDG. #B-M308	ARMORY
		INFANTRY TRAINING S	SCHOOL
SITE	#1	BLDG #TC-816	ARMORY
	#2	" #TC_817	COMM SHOP
e 1 , 11	#3	" #TC-820	APMORY
		#10-020	ARMORI
		MCES	
SITE	#1	BLDG. #BB-49	ARMORY
	#2	" #BB-51	MAINTENANCE
	#3	" #BB-294	UTILITIES INST CO.
		RESERVE SUPPORT UNIT	
SITE	#1	BLDG, #1111	MAINTENANCE FACTURY
			THE FACTOR



MARINE CORPS BASE

SUPPORT BATTALION

SITE #1 BLDG. #1117 ARMORY

MARINE CORPS SERVICE SUPPORT SCHOOLS

SITE	#1	BLDG. #M119	
	#2 #3	M120702 "M191 DTS MOTOR POOL	
		AC/S, LOGISTICS	
SITE	#1 #2 #3 #4	BLDG. #1502 " 908 " 80 BLDG. #AS-118	MOTOR TRANSPORT BODY SHOP PRINTING PLANT MOTOR TRANSPORT

(



2D MARINE DIVISION GENERATING/STORAGE SITES

	has been a set of the	HOBN	
SITE	#1	BLDG. #1780	TRUCK CO
		2D CBT ENG	
SITE	#1 #2	BLDG. #1803	HEAVY EQUIPMENT MOTOR TRANSPORT
	12000	2D TANK BN	
SITE	#1 #2	BLDG. #1854	MOTOR TRANSPORT MOTOR TRANSPORT BATTERY ROOM
	#3	n an	TANK FACILITY
		2D LAV BN	
SITE	#1 #2 #3	BLDG. #429 " " #1750 " #1755	COMMUNICATIONS SHOP MOTOR TRANSPORT MAINTENANCE SHOP
		2D AMTRAC BN	
SITE	#1 #2 #3	BLDG. #A-2 BLDG. #A-47 BLDG. #A-47	MOTOR TRANSPORT MAINTENANCE SHOP MAINTENANCE SHOP BATTERY ROOM
		8th MAR, HOCO	
SITE	#1 #2 #3	BLDG. #TC-773 774 BLDG. #G-480 BLDG. # 721 712	MOTOR TRANSPORT SEC ARMORY Sagety Kleen COMMUNICATIONS CO (Batteries)
			-)

TT



2D FSSG

		2D MAIN	NT BN	
SITE	#1 .	BLDG.	#FC-40	H&S CO
	#2	~ BLDG.	¥909	OPERATIONAL READINESS FLOAT
	#3	_ BLDG. #	‡1601	MOTOR TRANSPORT MAINT CO
	#4	- BLDG. ‡	‡1601	GENERAL SUPPORT MAINT CO
	#5	-BLDG. #	\$901	ORDNANCE MAINT CO
	#6	BLDG. #	^{‡902}	ENGINEER MAINT CO
		BLDG # 2D SUE	PLY BN	ELMA CO.
SITE	#1	BLDG #	FC_263	MOTOR TRANSPORT CO
UTTE	#2	BLDG.	\$ 915	PRESERVATION PACKAGING
				AND PACKING
	#3	BLDG. #	\$ 916	DEPLOYMENT SUPPORT UNIT
	#4	BLDG.	#TP-457	FLAMMABLE STORAGE WARE- HOUSE
		8th ENGINE	ERS SUPPLY	
STTE	#1	BIDC +	FC 200	MATNEENANCE
UTIL	#2	BLDG. #	GP-13	COMMUNICATIONS SHOP
		8th COMMUN	ICATIONS BN	
CIME	#1	BLDC #	BC 100	
STIE	#1	BLDG. #	FC-100	FLECTRONIC MAINT
	#2	BLDG. #	FC-100	MOTOR TRANSPORT &
		· · · · · · · · · ·		ELECTRONIC MAINT
				BATTERY ROOM
	#3	BLDG. #	1605	"A" CO., RADIO PLT
	#4	BLDG. #	:1604	"B" CO., RADIO PLT
		2D RADI	O BN	
SITE	#1	BLDG. #	FC-241	MOTOR TRANSPORT
	#2	BLDG. #	FC-365	COMMUNICATIONS SHOP
		FOREC	ON CO	
SITE	#1	BLDG. #	251	COMMUNICATIONS SHOP
		2D AN	GLICO	
SITE	#1	BLDG. #	FC-251	MOTOR TRANSPORT



2DLOGSPTBN

SITE	#1 #2	BLD(DG. #FC-120 MOTOR T "#FC-302 ARMORY	MOTOR TRANSPORT ARMORY
	#3	BLDO	G. #1871	COMMUNICATION SHOP



Inspector:	D. Ellison
Address:	ASEPA
	RIV
Telephone n	0: (404) 342-7603

RCRA LAND RESTRICTION F- SOLVENT GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

	- THIS MUCLY OF	9 05 Highway 1
	B. Street (or o	ther identifier)
Camp he jeune NC	28542	Daslau
D. State	E. Zip Code	F. County Nam
Military		
G. Nature of business; Identification of C	Operations	
NC 61700 22580		
H. EPA ID #		
Dans Sharps (gic)		
I. Handler Contact (Name and Phone Number)	431-1690	
Generator Compliance		
F-Solvent Identification		Comments
1. Does the handler concrete the		
following wastes?		
	,	
	V Yes No	
b. F002	Ves No	
c. F003 \checkmark Yes No		
If an FOO3 wastestream listed		
solely for ignitability was mixed		
with a non-restricted solid or		
with a non-restricted solid or hazardous waste, does the		
with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?		
with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?	YesNo	
with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? d. FOO4	Yes No	
<pre>with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? d. FOO4</pre>	YesNo YesNo	
 with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic? d. FO04 e. F005 	YesNo YesNo YesNo	

Appendix A is intended to assist the inspector and enforcement official in determining whether the handler is generating F-solvent wastes, if such wastes were not identified by the handler previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below:



		ID Number: Inspector: Date:
	National Variances and Extensions/Petitions	
1	1. Is the waste generated by a Small Quantity Generator? [268.30(a)(1)]Yes	No
2	2. Is the waste generated from a RCRA corrective action? [268.30(a)(2)]Yes	NoSome
3	3. Is the waste generated from a CERCIA response action? [268.30(a)(2)] Yes	No Some
4	Is the solvent waste a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil contain- ing less than one percent total	
	[268.30(a)(3)] Yes	No_Some
5.	Any extensions/petitions approved?	No
E	BDAT Treatability Group - Treatment Standards I	
<u>Wa</u> 1.	L§268.41]. Wastewaters containing solvents; spent methylene chloride in pharmaceutical wastewaters; all other spent solvent wastes]? Yes <u>aste analysis</u> Did the generator determine whether the waste exceeds treatment standards	_ No
	based on §268.7(a):	
	based on §268.7(a): a. knowledge of the wasteYes	No
	based on §268.7(a): a. knowledge of the waste <u>Yes</u> b. TCLP <u>Yes</u>	No
	based on §268.7(a): a. knowledge of the waste <u>Yes</u> b. TCLP <u>Yes</u> If knowledge, note how this is adequate: <u>base</u>	No No red on product upod
	based on §268.7(a): a. knowledge of the waste <u>Yes</u> b. TCLP <u>Yes</u> If knowledge, note how this is adequate: <u>base</u> If determined by TCLP, provide date of last test, frequency of testing, and attach test results.	No No red on product usod
	<pre>based on §268.7(a): a. knowledge of the wasteYesYesYes</pre>	No No red on product usod

1. I. I.

1 .



Handler Name:	
ID Number:	
Inspector:	-

Comments

Some

2.	Did the F-solvent wastes exceed
	applicable treatability group
	treatment standards upon
	generation [§268.7(a)(2)]?

3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3]

E. Management

- 1. On-site management
 - a. Were F-solvent wastes managed on-site?

If yes, answer 1(b) and (c); if no, answer 2.

Yes No

Yes / No

No

No

/ No

No

OK

Had example @

but no copy for shipment on

1-12-87 manibest document

E xample has all of them (Attached)

Turned up on 4/1/87 before Left the Bass

#74

Yes

Yes

Says provided

Yes

Yes_

- b. For wastes that exceed treatment standards, was treatment, storage Yes No Storage and/or disposal conducted?
 - If yes, TSDF Land Restriction checklist must be completed.
- c. Are test results maintained in the operating record?

2. Off-site management

a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

(i) EPA waste number?

- (ii) Applicable treatment standard?
- (iii)Manifest number?
- (iv) Waste analysis data, if available?

V Yes Y No Identify off-site treatment facilities

NEW York - will notoncer use



Handler Name:	
ID Number:	Real Providence
Inspector:	NOT THE REAL PROPERTY OF
Date:	Ref. Total Control of State

If F trea	-solvent wastes does not exce tment standards, did	ed	Co	ments
gene faci	rator provide the disposal lity [268.7(a)(2)]:	NA		
(i)	EPA Hazardous waste number?	Yes	No	
(ii)	Applicable treatment standard?	Yes	_No	
(iii)Manifest number?	Yes	No	
(iv)	Waste analysis data, if available?	Yes	No	
(v)	Certification regarding waste and that it meets treatment standards?	Yes	No	
Ident recei	ify land disposal facilities ving the BDAT certified			

c. If waste is subject to nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5) or petition (268.6) does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]?

NF Yes No

F. Storage of F-solvent waste

 Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG)?



No

Yes

If yes, was facility operating under interim status or permit?

If yes, TSDF Checklist must be completed.



Handler name_____ ID Number Inspector _____ Date

G. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?

Yes No

If yes, list type of treatment unit and processes

Residuals from RCRA-exempt treatment units are subject to Land Disposal Restrictions Program. Ascertain whether residuals have been subjected to restriction program requirements.


RCRA F-SOLVENT LAND RESTRICTION

TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

 $\frac{D. \ Ellison}{Inspector Name} \\ \frac{R \mid V}{Address} \\ (404) \ 547-760 \ B \\ Tel. No.$

I.	FACILITY IDENTIFICATION				
2	Usme camp Legen	nl	N	C Hishway	24 & US Hickney M
	raciiity Name		в.	Street (or o	other identifier)
_	Jacksonville	NC		28542	Onday
c.	City D.	State	E.	Zip Code	F. County Nar
	Military				
G.	Nature of business; identification	of operatio	ns		
	NC6170072580				
н.	EPA ID #				
	Danny Sharado	1919 44	=1 -11	20	
I.	Facility Contact (Name and Phone Nu	umber)	21-16	40	
II.A	For on-site facilities complete				Comments
		: the genera	tor che	Cklist	
B	General Facility Standards				
1.	Was waste analysis plan revised	TRE	ISED		
	properly to cover Part 268	Noi B	out of		
	requirements [\$264.13 or 265.13]?	Yes_	No		
2.	Did facility obtain representative				
	chemical and physical analysis of	4			
	waste(s) and residues?	Yes	No		
	a. Did testing include analyses for	r			
	all FOOL-FOO5 constituents?	VYes _	No		
	b. Were analyses performed		,	knowled	c for
	using TCLP?	Yes _	No P	vocluci	
	c. Were analyses conducted onsite	or			
	offsite (identify offsite lab)	?	Off:		
	d. Describe frequency of sampling.			and the second	
	e. Describe procedures used to				
	Mentily manifest discrepancies				
3.	Are the waste analysis plans accept	table			
	[9264.13/265.13]?	Yes	No		
4.	Are the operating records, including	ng		an a	
	analyses and quantities, complete		1.0		
	13209.13/203.13]?	V Yes	NO		



Facility	: USMG
ID Number	r:
Inspector	T: D. GILSON
Date:	3-31-87
Commer	nts

B. Storage (§268.50)

 a. Were F001-F005 wastes exceeding treatment standards <u>stored</u>?

V Yes No

If no, go to "C"

b. Are all containers and tanks clearly marked to identify contents and date(s) entering storage?

VYes No

c. Do operating records track the location, quantity and dates wastes exceeding treatment standards entered and were removed from storage?

Vyes No

Yes No

Yes / No

No

Yes

- d. Do operating records agree with container/tank labeling?
- e. Is waste exceeding treatment standards stored for less than 1 year?

If yes, can you show that such accumulation is not necessary to facilitate proper recovery treatment or disposal?

If yes, state how:

f. Were tanks emptied and containers sent for treatment at least once per year, and do operating records show that the volume of waste removed from tanks annually at least equals tank volume?

NA Yes No

Yes No

g. Was/is waste exceeding treatment standards stored for more than one year?



Facility:	
ID Number:	State State
Inspector:	and and and
Date:	

Comments

If yes, state the owner/operators' proof that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal:

- h. Are F-solvent wastes exceeding treatment standards "stored" in surface impoundments?
- C. Treatment in Surface Impoundments (§268.4) NA
 - Were F001-F005 wastes exceeding treatment standards placed in surface impoundments for treatment?

If no, go to "D"

- 2. Does the facility have acceptable evidence that treatment occurs in the impoundment? Yes No If yes, note the evidence
- 3. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably and in accordance with the sampling frequency and analysis specified in the waste analysis plan, and are the results in the operating record? Yes No
- 4. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards specified in §268.41?

Yes No

Yes VNo

Yes No

- 5. Provide the frequency of analyses conducted on treatment residues:
- 6. Have the hazardous waste residues that exceed the treatment standards (§268.41) been removed adequately, and on an annual basis?



Comments



	 A supervised and a supervised state of the supervised state of th		Facility:	t care building a training
•			ID Number:	
alar na najodije baja			Date:	and the second
	(-) 75			the second second
	(d) II answer to 6 is no and			
	exceed treatment concen-			
	trations, is annual			
	throughput greater			
	than impoundment volume?	Yes No		
	7. If residues were removed annually			
	were adequate precautions taken to			
	protect liners and do records			
	indicate that inspections of liner	in the second second		
	integrity are performed?	Yes No		
	8. When removed, were solvent wastes			
	managed subsequently in another			
	surface impoundment?	Yes No		
	9. When removed, were waster treated			
	prior to disposal?	Vac No		
		NO		
	(a) If yes, are waste residues treated			
	on-site or off-site:	Onsite	Offsite	
	(b) Identify management method:			
	10. Is the information on May 2.0 st			1. 18 1
	adequately documented in the waste			
	analysis plan and operating record?	Yes No		
	11. Have the minimum technology require-			
	mencs (9204.221 or 205.221) been met?	Yes No		
	If the minimum technology requirements			
	have not been met, has a waiver (268.4	(a)(3))		and the second
	been granted for that unit(s)?	Yes No		
	12. Have the Subment E man a			
	toring requirements been met?	Vee No		
		_ies_No		
	13. Did the facility submit a certifi-			
	cation of compliance with minimum			
	monitoring remirements			
	and the waste analysis nlan			
	to the Agency?	Yes No		
			Companda	

. -18 ·



Facility:	
ID Number:	Charles and the
Inspector:	
Date:	and the second second

D. Treatment

1. 11 9

 Did the facility operate treatment facilities for F-solvent waste (not including surface impoundments)?

Yes VNO

Yes No

Yes No

Yes No

If no, go to "E"

- Describe the treatment processes for F-solvent wastes:
- 3. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the F-solvent wastes are less than treatment standards [§268.7(b)]?
- 4. Describe frequency of testing of treatment residuals.
- 5. Was dilution used as a substitute for treatment?
- Are certifications and results of waste analyses kept in the operating record? Yes No
- 7. Are notices with waste number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment stating that waste has been treated to treatment performance standards [§268.7(b)]?
- Are certifications submitted for each shipment [§268.7(b)]?
 Yes No



Facility	
ID Number	and the state and the state of the state of the
Inspector	
Date	Service and the second second second second

E. Land Disposal

 Were F-solvent wastes placed in land disposal units (landfills, surface impoundments[for this question, do not include if in "C"] waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vault or bunker?

Yes No

2. Did facility have the notice and certification from generators in its operating record [§§268.7(c); 268.7(a), (b)]?

Yes No

NO

3. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [§268.7(c)] Yes

If yes, at what frequency?

4. Were F-solvent wastes exceeding the treatment standards placed in land disposal units [268.30](excluding national capacity variances[268.30(a)] Yes No

If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case capacity extension [268.5] or variance [268.44] Yes No

- 5. Were F-solvent wastes subject to a national or case-by case capacity variance/extension disposed? Yes No
 - a. If yes, were these wastes disposed in a facility that has a new, replacement, or laterally expanded landfill or impoundment? Yes No

If (a) is yes, have the minimum technology requirements been met for all such units at the facility? Yes No

If (a) is yes, has the minimum technology requirements inspection been performed? Yes

les_No



Facility	
ID Number	
Inspector	-
Date	

Comments

6. Were adequate records of disposal maintained?

Yes No

- 7. If wastes subject to a nationwide variances, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have notices [268.7(a)(3)] and records of disposal?
- 8. What is the volume of F-solvent waste disposed to date (by waste)?
- 9. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports?

Yes No

Yes No



DATE: 16 Apr 87

DEPARTMENT OF THE NAVY

Memorandum 6240 NREAD

 FROM: Environmental Control Specialist, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune
 Supervisory Ecologist, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune

SUBJ: MEMORANDUM OF CHEMICAL SPILL - CENTRAL HEATING PLANT

1. On 1 April 1987 at approximately 1620, Mr. David Southerland, Utilities Branch, contacted NREAD regarding a chemical spill located outside the Central Heating Plant at the chemical storage tanks. Ms. Glenee Smith, NREAD, advised Mr. Southerland that the Steam Generation Section should call the Base Fire Department to report the spill.

The source of the spill was a vertical polyethylene tank with 2. a storage capacity of 5600 gallons. The tank contained approximately 4000 gallons of a neutralizing amine composed of 40% cyclohexylamine, 40% morpholine, and 20% water, which is an extremely caustic and flammable material.' The cause of the spill appeared to be equipment failure, in that the coupling, behind the shut-off valve which attached the site-glass to the tank, had broken off. Mr. Ernest Humphrey, Boiler Plant Operator Leader, was exposed to fumes and physical contact with the chemical during his successful attempt to stop the leak. The chemical is extremely hazardous if it comes in contact with skin or if the fumes are inhaled. Mr. Humphrey was advised by supervisor to report at the Naval Regional Medical Center to be examined by doctors. The spilled chemical was initially prevented from being discharged to the surrounding area by a spill containment basin. The chemical was diluted with approximately 6000 gallons of water and discharged to the sanitary sewer, at a ph of 8, on 1 April 1987.

3. Ms. Glence Smith and Mr. Ken Warren, NREAD, reported to the spill scene in accordance with the phone call placed by Mr. Southerland. The Fire Department was on the scene of the spill when NREAD arrived.

4. During the incident, NREAD representatives made the following observations:

a. There was not a suitable pump available to transfer the concentrated liquid to containers. This resulted in the use of large quantities of water to dilute the chemical and discharging it into the sanitary sewer. It greatly increased the time required to resolve emergency, and the situation would have become even more critical if the leak had not been initially stopped by Mr. Humphrey.



6240 NREAD 16 Apr 87

Subj: MEMORANDUM OF CHEMICAL SPILL - CENTRAL HEATING PLANT

b. A spill reporting sign, in accordance with Base Order 11090.1B, enclosure (2), page 2, paragraph 1c, was not installed at the site.

c. The containment basin was defective in that significant quantities of chemical leaked out of the basin. This required that the chemical be discharged to the sanitary sewer immediately rather than waiting until the next day when the situation could have been handled under better circumstances.

> GLENEE SMITH ENVIRONMENTAL CONTROL SPECIALIST



Moree

Miscellany

109AD DIVINIA NO. DU MOUNT

Daily News Friday, April 3, 1987

Worker halts spill

An apparent equipment failure Wednesday at Camp Lejeune's steam plant caused accidental discharge of about 200 gallons of a caustic neutralizing chemical, according to a base spokesman.

cording to a base spokesman. "Prompt and resourceful action by a base employee and quick response by the base fire department and natural resources personnel resolved a potentially dangerous situation here," said Lt. Col. David F. Tomsky of Lejeune's Joint Public Affairs Office.

The incident occurred about 4 o.m. at the plant in the Industrial Area.

Area. Ernest Humphrey, boiler plant operator leader, stopped the lischarge by placing a broom hanile in the leak, but was exposed to he caustic chemical known as an amine and its fumes.

imine and its fumes. Humphrey was taken to the Naval Iospital, where he was treated, bserved and released Wednesday

evening, Tomsky said. No one else required medical treatment. An amine is a derivative of ammonia.

The amine is used in treatment of boiler feed water. It assists in protection of steam and condensate pipes.

"The chemical was stored in a 5,600-gallon capacity polyethylene vertical storage tank which contained approximately 4,000 gallons of amine) at the time of the incident, Tomsky said.

Firefighters used about 6,000 gallons of water to dilute the chemical

The diluted and neutralized chemical was then discharged into a sanitary sewer in keeping with applicable regulations. The neutralizing amine is composed of 20 percent water, 40 percent mortholine and 40 percent cyclohexylamine, he said. The cleanup was completed about 8 p.m. Wednesday, Cause of the spill is under investigation.







DATE: 27 Sep 1978

Ecologist

FROM

TO

MEMO FOR THE RECORD

SUBJ Disposal of Mercury Spill

1. On 25 September 1978, Mr. Fred Wood, North Carolina Department of Human Resources, Solid Waste Branch, was contacted regarding disposal instructions for approximately 3/4 pounds of mercury mixed with 5-7 pounds of soil.

2. At approximately 1300 on 25 September, Mr. Wood advised after conferring with Mr. Strickland, his supervisor, that the mercury waste could be encased in concrete and buried in the chemical landfill near the Rifle Range.

uhan d. Wooten

JULIAN I. WOOTEN

26 Jan 87 Twylat Make Two Copies of This and make a file on Mercury Spill Chan up with one of the copies. Julia

27 Sep 1978

Ecologist

MEMO FOR THE RECORD

Disposal of Mercury Spill

1. On 25 September 1978, Mr. Fred Wood, North Carolina Department of Human Resources, Solid Waste Branch, was contacted regarding disposal instructions for approximately 3/4 pounds of mercury mixed with 5-7 pounds of soil.

 At approximately 1300 on 25 September, Mr. Wood advised after conferring with Mr. Strickland, his supervisor, that the mercury waste could be encased in concrete and buried in the chemical landfill near the Rifle Range.

JULIAN 1. WOOTEN



0

DATE: 27 Sep 1978

Ecologist

FROM

TO

MEMO FOR THE RECORD

SUBJ Disposal of Mercury Spill

1. On 25 September 1978, Mr. Fred Wood, North Carolina Department of Human Resources, Solid Waste Branch, was contacted regarding disposal instructions for approximately 3/4 pounds of mercury mixed with 5-7 pounds of soil.

2. At approximately 1300 on 25 September, Mr. Wood advised after conferring with Mr. Strickland, his supervisor, that the mercury waste could be encased in concrete and buried in the chemical landfill near the Rifle Range.

hai d. Woote

JULIAN I. WOOTEN

27 Sep 1978

Ecotogist

MEMO FOR THE RECORD

Disposal of Mercury Spill

1. On 25 September 1978, Mr. Fred Wood, North Carolina Department of Human Resources, Solid Waste Branch, was contacted regarding disposal instructions for approximately 3/4 pounds of mercury mixed with 5-7 pounds of soil.

2. At approximately 1300 on 25 September, Mr. Wood advised after conferring with Mr. Strickland, his supervisor, that the mercury waste could be encased in concrete and buried in the chemical landfill near the Rifle Rango.

JULIAN I. WOOTEN





DATE: 20 Sept., 1978 6260.3

FROM: Industrial Hygiene Office, NRMC, CLNC, 28542

TO: Natural Resources and Environmental Affairs Division, MCB, CLNC, 28542

SUBJ: Mercury Spill; Disposition of

1. On 19 Sept., 1978 at approx. 1300, Mr. Wooten of your office notified this office of a mercury spill at the main steam heating plant, bldg. 1700. A steam pipe was cut and mercury was spilled from it when it was dropped to the floor.

2. Disposition of the spill consisted of spreading HGX solution on the areas of the floor with mercury contamination and vaccuming the contaminated debris and HGX from the floor. Readings of the area showed vaporization to 0.02 mg/M² (TLV-0.05 mg/M²). The readings are now considered 0.00mg/M² and are safe for work.

3. Disposal of the contaminated debris is pending evualation of your office . Approximately 3/4 pound of mercury with 5-7 pounds of dirt and debris was recovered.

J.C. McDONOUGH

Industrial Hygienist Ens/MSC/USNR





27 Sep 1978

Ecologist

MEMO FOR THE RECORD

Disposal of Mercury Spill

1. On 25 September 1978, Mr. Fred Wood, North Carolina Department of Human Resources, Solid Waste Branch, was contacted regarding disposal instructions for approximately 3/4 pounds of mercury mixed with 5-7 pounds of soil.

2. At approximately 1300 on 25 September, Mr. Wood advised after conferring with Mr. Strickland, his supervisor, that the mercury waste could be encased in concrete and buried in the chemical landfill near the Rifle Range.

JULIAN I. WOOTEN

198 197 Sen 1979

AND A COUNT

CROCER SHE HE CORD

halpátola

flind www.shall to faconalia

 Ga 25 September 1978, Mar. Stred wood, North, Seroline Republicant St Unites Toroarces. Solid Waste Scaneb, the contacted reparties disposation instructions for depleximately. As pounds of moroarcy dised with SF2 gounds of solid.

2. At specking tety 1320 on to September, the mode bayised state conterning with the table of supervision, the second bayised state could be excessed in objective and burlied in the constlect lendaily near the kirls "ange.

S. S. Stelander Stor

LATOON . FHALEIA

Warry Thread Man and

1907 - 6 L

·并不能是一种选择。

Plat What is



UNITED STATES MARINE CORPS MARINE CORPS AIR STATION CHERRY POINT, NORTH CAROLINA 28533

> GNS-bb/LJR 5050A \$ 7 APR 1978

FIRST ENDORSEMENT on Chairman, Toxic Material Control Committee Meeting of 19 April 1978

From: Commanding General To: Chairman, Toxic Material Control Committee

Subj: Toxic Material Control Committee Meeting; minutes of

1. Returned. Contents noted.

Approved/Disapproved.

Chief of Staff





UNITED STATES MARINE CORPS MARINE CORPS AIR STATION CHERRY POINT, NORTH CAROLINA 28533

GNS-bb/LJR 5050A 24 April 1978

From: Chairman, Toxic Material Control Committee To: Commanding General

Subj: Toxic Material Control Committee; minutes of

Ref: (a) AirSta0 5420.21B of 3 Dec 1974

1. In compliance with reference (a), subject meeting was called to order by the Acting Chairman at 0930 on 19 April 1978 in the Management Information Center Conference Room, Supply Department, Bldg. 159. The following members were present:

Lt. R. C. Ewing

Maj. R. F. Gmerek Capt. G. D. Nelson Ensign J. C. McDonough SSgt. J. R. Hawn, Jr. Mr. L. Langdon Mr. J. Eaton Mr. J. S. Wright Mr. J. Floyd Mr. V. D. Henry Mr. E. P. Smith Mr. L. J. Realini Chief, Occupational, Environmental and Preventive Medicine Service, Acting Chairman Material Group Officer, Supply Dept. Ground Safety Officer, 2dMAW Industrial Hygienist, NRMC, GamLej NCOIC, Wing Ground Safety Deputy Director, Facilities Maintenance Dept. Electrical Trades, Facilities Maintenance Dept. NREA Officer, Installations and Logistics Station Chemist Chief Inspector, Fire Dept. Environmental Health Tech, NRMC, CamLej Ground Safety Officer

2. The following Toxic Material Control Agenda Items were discussed:

a. Old Agenda Items

(1) Item. Polyurethane Paint, additional information/action required.

Discussion. The message R1015302 Apr 1978 from BuMed assigns action lead to the Medical Department. It requires identification of all infra-red polyurethane paint and an on-board industrial hygiene survey of operating conditions as well as subsequent conduct of surveys. This message request COMNAVSURFLANT to identify a point of contact to NAVENPUNTMEDU Two for local coordination. BuMed is to be furnished information on all subsequent actions.

Recommendation. Medical Department, Environmental Preventive Medicine Service, comply with this message.



GNS-bb/LJR 5050A 24 April 1978

b. New Agenda Items

(1) Item. Polychlorinated Biphenyls (PCBs).

Discussion. Because Polychlorinated Biphenyls (PCBs) are suspected to be carcinogenic and mutagenic, the Toxic Substance Control Act (TSCA) prohibits the manufacture and distribution of PCB after January 1, 1979. However, in the past, PCBs, which occur as a liquid, have been used in transformers and large capacitors as insulators or coolants due to its low flammability and explosive potential. PCBs are considered to be highly toxic by ingestion, inhalation, and absorption. Message RO615022 Apr 1978 from CMC requires the following action:

a. By July 2, 1978, effect completion and maintenance of an inventory of PCB liquids, PCB transformers, and PCB high or low voltage capacitors which have 3 pounds (1.36 kilograms) or more of PCBs. A copy of the inventory should be provided to CMC (Code LFF) by August 2, 1978. This inventory shall contain the following information:

Dates these items are removed from service, when/where they are stored, when transported for disposal, the amount of PCBs in kilograms, and the disposal method.

b. Develop, implement and have available for inspection, plans to ensure that PCBs cannot spill into bodies of water.

c. Mark/placard PCB equipment with prescribed warning signs before January, 1979.

d. Comply with disposal procedures, in accordance with CFR, Part 8, Environmental Protection Agency, Polychlorinated Biphenyls; disposal and marking of.

e. Discontinue the storage of PCB liquid and remove, if on hand, any PCB liquid to the disposal site as soon as possible.

f. Request necessary technical guidance from the cognizant Naval Facilities Engineering command.

Recommendation. Action was assigned as follows:

1a. Deputy Director, Facilities Maintenance Dept., submit work request to have the required inventory of transformers and/or capacitors containing 3 pounds (1.36 kilograms) of PCB completed. Additionally, this inventory will show the location i. e. building, pole number, etc.

Assigned to NREA Officer.







GNS-bb/LJR 5050A 24 April 1978

1c. Assigned Facilities Maintenance Repair Division.

1d. Assigned Chief, DPDO.

le. No assignment since there are none in storage (one transformer on hand).

1f. Assigned to NREA Officer.

All members tasked with the above responsibilities were requested to provide input to the Acting Chairman as action is accomplished.

(2) Item. Storage of DDT at DPDO.

Discussion. The Acting Chairman informed the committee he has been furnished information indicating DDT is still stored at DPDO and that the containers are rusting and deteriorating. The Station Chemist stated he has inspected the DDT containers and the containers (55 gallon drums) are indeed rusting. Since the NREA Officer stated EPA has not issued directions for disposal of DDT, the Ground Safety Officer recommended the Chief, DPDO, contact Memphis, Tenn., for instructions on disposal of DDT.

<u>Recommendation</u>. The committee recommended the Chief, DPDO, contact Memphis regarding proper methods of disposing of DDT and, in the meantime, if the containers are rusting and deteriorating, the DDT should be placed in new containers, and a structure erected over them. The Acting Chairman requested the NREA Officer to follow-up on this item with DPDO.

3

4. Open Forum. There were no items discussed during Open Forum.

5. There being no further business the meeting adjourned at 1040.

EWING R. C.

Medical Officer recommends:

2.a.(1)

2.b.(1)

2.b.(2)

Copy to: Members Directorates Approval

Disapproval


ACTION INFO INITIAL BMO ABMO MAINT NCO SAFETY CHMN PROP M&R OPNS ADMIN TELE UTIL ENVIRON AFF SECRETARY F&A BRANCH 11 01 Jul ang in 2 letter th intentional qu





CRT:rcc 6260 17 August 1977

From: Chief, Occupational and Preventive Medicine Service To: Commanding Officer

Subj: Clean-up of mercury spill in the Emergency Room of Bldg. 15; report of

1. On 8 August 1977 this Service was notified by Bldg. 15 personnel that there was a mercury spill in the E. R. The room was secured immediately pending arrival of the OSPMS Industrial Hygiene personnel. Investigation revealed mercury leaking from a wall mounted shyomomanometer when air pressure was applied. A sixteen square foot area of the deck had been contaminated with mercury. The sphyenomenometer was removed from the wall, decontaminated, and the residual mercury extracted from the reservoir. The spilled mercury was collected utilizing a pipette attached to a flask containing water (to minimize vaporization of the mercury after collection) which in turn was connected to a small vacuum pump by flexible hoses. A total of 47 grams of mercury was recovered and subsequently disposed of by the Natural Resources Water Quality Control Laboratory. Eax powder (a non-odorous, water soluble metallic-mercury-sulfide converting powder combined with a chelating compound and a dispensing agent) was then liberally spread over the contaminated area and wetted down with water (this was to prevent any further vaporization of the mercury which was uncollectable). Twelve hours later the NoX was removed and the room reopened.

2. Heretofore, mercury spills covering larger areas required time consuming and costly delays because a "Mer-Vac" (an industrial type vacuum cleaner with special attackments for picking up mercury) had to be borrowed from EPND-2 necessitating pick-up and return by driving to Norfolk. This situation has been eliminated with the recent acquisition of a "Mer-Vac" on 5 August 1977. OsPMS is now capable of responding to and decontaminating large mercury spills immediately thereby minimizing further contamination and cost.

3. Reportedly, NRMC, Portsmouth, Va. replaced all of its mercury sphygacmanoneters last year with non-mercury containing apparatus because of an accident similar to this one. The mercury spill was not treated as a potential health hazard and submarine personnel tracked mercury back to their ship. Environmental monitoring apparatus aboard the sub detected the mercury vapor, and the sub had to be decontaminated at substantial cost. Phased replacement of NRMC mercury containing sphymomanometers with non-mercury containing ones is recommended in order to reduce potential exposure of staff and patients to mercury.

C. R. THOMPSON



To the to be a first of the second state of th

a state of the second state

1位、1年、1月日二月



Copy to: Chief, Dispensary Services Chief, Fiscal Supply OSPMS, Cherry Point Base Safety Officer Base Maintenance Officer C.O., NEDC Chief, NEMC Dental Service

- Wala

HARLING BE

1986 8

Action - con

and the second

San Star

Same La sta

and the start

Autor Strate &

DASE MAINTENANCE DEPARTMENT Marine Corps Base ejeune, North Carolina 28542

> MAIN/CDW/gbg 6240/1 2 Feb 1978

ING GENERAL

val Regional Medical Center

54:CRT:sp 6240/1 dtd 25 Jan 78

cribed in paragraph 7, reference (a), has irector, Preventive Medicine Unit, NRMC and

o clean up the spill have been utilized and effective in reducing the potential hazard e spilled mercury was recovered with a special wired for this purpose. A compound called HgX the spill area and also applied to the plumbing

system. This material combines with mercury and makes it harmless to personnel. In addition, the PWO, NRMC, who is responsible for maintenance of all hospital facilities, will caution his plumbing shop to use particular care in working on the plumbing in the vicinity of the spill.

3. The Director, PMU, states that he has recently added a Military Industrial Hygenist to his staff, who will serve as a source of expertise on special problems dealing with toxic materials. One of his areas of responsibility will be the prevention and handling of spills, such as the recent mercury incident.

ery respect C. D. WOOD

Base Maintenance Officer



NREA File. to Julian retain why winnet we made aware?



Co has purfed zell?

BASE MAINTENANCE DEPARTMENT Marine Corps Base Camp Lejeune, North Carolina 28542

MAIN/CDW/gbg 6240/1 2 Feb 1978

MEMORANDUM FOR THE COMMANDING GENERAL

Via: Chief of Staff

Subj: Mercury spill at Naval Regional Medical Center

Ref: (a) CO, NRMC ltr 54:CRT:sp 6240/1 dtd 25 Jan 78

1. The mercury spill described in paragraph 7, reference (a), has been discussed with the Director, Preventive Medicine Unit, NRMC and with the PWO, NRMC.

2. All available means to clean up the spill have been utilized and are believed to have been effective in reducing the potential hazard to personnel. Some of the spilled mercury was recovered with a special vacuum pump recently acquired for this purpose. A compound called HgX was used to decontaminate the spill area and also applied to the plumbing system. This material combines with mercury and makes it harmless to personnel. In addition, the PWO, NRMC, who is responsible for maintenance of all hospital facilities, will caution his plumbing shop to use particular care in working on the plumbing in the vicinity of the spill.

3. The Director, PMU, states that he has recently added a Military Industrial Hygenist to his staff, who will serve as a source of expertise on special problems dealing with toxic materials. One of his areas of responsibility will be the prevention and handling of spills, such as the recent mercury incident.

Very respectfully, D. WOOD

Base Maintenance Officer





MAIN/CDW/gbg 6240/1 2 Feb 1978

MEMORANDUM FOR THE COMMANDING GENERAL

Via: Chief of Staff

Subj: Mercury spill at Naval Regional Medical Center

Ref: (a) CO, NRMC ltr 54:CRT:sp 6240/1 dtd 25 Jan 78

1. The mercury spill described in paragraph 7, reference (a), has been discussed with the Director, Preventive Medicine Unit, NRMC and with the PWO, NRMC.

2. All available means to clean up the spill have been utilized and are believed to have been effective in reducing the potential hazard to personnel. Some of the spilled mercury was recovered with a special vacuum pump recently acquired for this purpose. A compound called HgX was used to decontaminate the spill area and also applied to the plumbing system. This material combines with mercury and makes it harmless to personnel. In addition, the PWO, NRMC, who is responsible for maintenance of all hospital facilities, will caution his plumbing shop to use particular care in working on the plumbing in the vicinity of the spill.

3. The Director, PMU, states that he has recently added a Military Industrial Hygenist to his staff, who will serve as a source of expertise on special problems dealing with toxic materials. One of his areas of responsibility will be the prevention and handling of spills, such as the recent mercury incident.

> C. D. WOOD Base Maintenance Officer

The Physics Stringer Line Stell

AFSLAGAN TAN ANTALA ATSLAGAN

tation server of the server is a solution because the server of the server of the server of the server of the s the server of t

and particular care linear and an and a long of the second start o

Toal Thespaces of 18 . .

Stand Street Stores & St.

all interported

NAVAL REGIONAL MEDICAL CENTER

CAMP LEJEUNE, N. C. 28542

IN REPLY REFER TO:

54:CRF:sp 6240/1 25 January 1978

From: Commanding Officer
To: Commanding General, Marine Corps Base, Camp Lejeune, N.C. 28542
Commanding General, Second Marine Division (REIN), FMF, Camp
Lejeune, N.C. 28542
Commanding General, Force Troops/Second Force Service Support
Group, FMFLANT, Camp Lejeune, N.C. 28542
Commanding Officer, Marine Corps Air Station (H), New River,
Jacksonville, N.C. 28540

Subj: Occupational and Preventive Medicine Service Activities Report for December

Ref: (a) DIVO P6000.1E

1. The Occupational and Preventive Medicine Service (O&PMS), Naval Regional Medical Center is responsible for providing a full range of occupational and environmental health and preventive medicine support for the entire Camp Lejeune complex. A consolidated report of O&PMS activities and support provided during the month of December is hereby submitted for information, and to satisfy the requirements of reference (a).

PREVENTIVE MEDICINE

2.	Env	vironmental Surveillance	MCB/NRMC	DIV FT M		MCAS (H)
	a.	Bio-environmental Inspections	135	22	14	12
	b.	Noscomial Infection Control Inspectio	ns 02	00	00	00
è	c.	Noscomial Infection Surveys	28	00	00	00

3. Communicable Disease Control

a. Sexually Transmitted Diseases (STD)

Г	Disease	Quad-	uad-Command MCB/NRMC 2d Mar Div		ar Div	FT/2d FSSG		MCAS (H)			
	Diagnosed	NOV	DEC	NOV	DEC	NOV	DEC	NOV	DEC	NON	DEC
	Gonorrhea	102	76	10	11	62	46	26	17	04	02
	Syphilis	01	01	00	00	01	00	00	01	00	00
	Chancroid	00	00	00	00	00	00	00	00	00	00
	Lympho- granuloma Venereum	00	00	00	00	00	00	00	00	00	00
-	Incidence Rates/1000	2.90	2.12	2.50	2.61	3.33	2.41	2.98	1.87	0.95	0.47





(1) Trends - The overall Quad-Command STD incidence rate decreased substantially for the month of December with twenty-six fewer cases than the month of November. 2d MAR DIV and MCAS(H) showed significant decreases in their incidence rates registering a lower rate for Dec than Nov. FT/2d FSSG also demonstrated a marked decrease in their incidence rate dropping from a 2.98 I.R. last month to a 1.87 I.R. this month. The incidence rate for MCB/ NRMC increased slightly from 2.50 last month to 2.61 this month.

(2) Total Communicable Disease Clinic (STD) Consultations: 772

b. Total Lab Tests Performed: 5091

· · · · · · · · · · · · · · · · · · ·		MCB/NRMC	DIV	FT	MCAS (H)
c.	Immunizations Given	53	08	10	312
đ.	Health Card Examinations	06	01	00	06
e.	Tuberculin Skin Tests	48	06	10	200

f. There were (01) cases of Tuberculosis and (00) cases of Viral Hepatitis diagnosed within the Quad-Command.

g. The O&PMS assisted the Division Surgeon's Office in 4 Readiness Indicator Command (RIC) inspections.

h. On 30 November and 1 December 1977, ten members of Bravo Company, 1st Battalion, 2d Marines were found to have a clinical syndrome consisting of an exanthem (skin eruption) confined to the face, neck, and distal half of the upper extremities. In all patients, this exanthem began as 0.3 to 0.7 cm erythematous (red) macules (rash) and, over the course of the ensuing five days, evolved morphologically to a maculo-papular rash (at 24-48 hours) followed by gradual resolution.

It was determined that the clinical symptoms were consistent with a diagnosis of Coxsackie virus, Group A, Type 9 infection. In view of the reported complications associated with Coxsackie A-9 infections (viz. meningitis, encephalitis, pneumonia), it was elected to quarantine all 125 members of Bravo Company. All personnel were transported from the field and quarantined in Barracks 202 and 204 as of 2030 on 30 November 1977.

On 1 December 1977, all members of Bravo Company were interviewed and then each examined for any evidence of an exanthem and/or signs of any of the reported complications of Coxsackie A-9. No signs or symptoms of any of the complications were noted. All personnel with any macular lesions of the face, neck, and/or distal upper extremities were selected out and isolated, together with the original, previously identified cases, apart from the remainder of the company.

At the conclusion of the examination of the entire company, a total of fourteen personnel were isolated with suspected lesions. None of these personnel demonstrated any signs or symptoms of complications arising from their illness. Naso-pharyngeal washings and stool specimens for viral isolation studies, as



well as serum samples for acute antibody titers, were obtained on all isolated personnel.

On 2 December 1977, all asymptomatic personnel in the company were reexamined for evidence of a skin rash. No new cases were identified. Quarantine procedures were discontinued for all personnel except the fourteen isolated persons.

i. On 2 December, 3 December and 5 December 1977, the fourteen isolated personnel were again interviewed and examined. During this time period, none of the 14 developed any signs or symptoms of the reported complications of Coxsackie A-9 infection. In retrospect, only 10 of the 14 isolated personnel developed the rash and other clinical features characteristic of this clinical entity. All personnel improved symptomatically and the rash underwent the evolution and resolution described in the opening paragraph. No new cases have been identified to date in the Camp Lejeune area. To date all laboratory findings have been negative for viral isolation.

j. During the period 19-20 December, Dr. C. GRABER, PhD, from the Medical University of South Carolina, Charleston, S.C. consulted and worked with Dr. Maurice SHEPARD on mycoplasmology procedures and techniques.

k. On 20 December, Dr. D. CRAVEN from the Public Health Service, N.I.H., Bethesda, Md. cultured the throats of 210 Marines to perform a survey and study of meningococcal carriers. Dr. CRAVEN was assisted by personnel from the O&PMS STD Laboratory.

1. Influenza immunizations continued throughout the month and approximately 14,000 personnel had been immunized through 31 December. The first of several immunization clinics was held on 28 December at Goettge Memorial Field House for active duty military (stragglers), dependents, non-appropriated fund personnel, and civil service employees. The majority of the active duty personnel were immunized at their respective Branch Clinics by clinic personnel under the supervision of HMC MILLER, O&PMS.

4. Training

Class Title	<u>C</u>	lass Length	MCB/NRMC	DIV	FT	MCAS (H)	
Food Service Sanitation	(Basic)	6 hours	44	00	00	00	
Food Service Sanitation	(Refresher)	3 hours	28	00	00	00	
STD Training		1 hour	14	00	00	20	

5. Insect Vector Control

a. Servicing of the mosquito light traps was continued during the month.

b. On 7 December, Dr. Purdy HILLMAN and Dr. Charles APPERSON from the North Carolina State Extension Entomology presented material for pest control certification for the state of North Carolina to 8 Preventive Medicine Technicians and 10 civilian pest control operators.



OCCUPATIONAL HEALTH

MCB/NRMC DIV FT MCAS(H)

00

01

01

01

6. Industrial Hygiene Surveys

7. On 21 December, a mercury spill of undertermined origin was reported to this Service by the oncoming laboratory crew at NRMC. Investigation by personnel of the O&PMS Industrial Hygiene Section revealed globules of mercury scattered around the basin of the general purpose stainless steel wash sink located adjacent to the "Coulter" CBC counter in the Hematology laboratory. 7.9 gms/0.28 oz of mercury was retreived by the use of a vaccum pump and pipette. The amount of mercury which may have been deposited into the sink drain is unknown. After removal of the mercury, HgX powder was distributed over the sink to prevent further vaporization of uncollected miniscular mercury, and then flushed down the drain.

Further investigation revealed that there were 2 glass bottles (containing a total of 783.9 gms) of "clean" mercury which alledgedly was used to replace mercury in the "Coulter" counter when it was leaking. This leak has been repaired. There was one empty 1 lb. glass bottle with a mercury label on it, but disposition of its contents was unknown. There were 3 small plastic bottles Containing various amounts of "dirty" mercury (total amount 105.6 gms), of which the origin was undetermined.

Because of the undetermined cause of the mercury spill, it is felt that some one had used the mercury for other than its intended purpose. Improper storage and handling procedures were also observed. All mercury (a total of 1.98 lbs.) was collected and turned over to the Water Quality Control Laboratory for disposal.

8. HML SIMS attended a two day seminar on the 1st and 2nd of December on "Cold Weather and its Effects" given by Dr. HAMBLET of the U.S. Army Research Institute of Environmental Medicine, Natick, Massachusetts.

C.R. Thompson

C.R. THOMPSON By direction

Copy to: Division Surgeon C.O., 2d Med Bn Tri-Command Food Service Officer O&PMS, Cherry Point C.O. 1/2 Chief, Branch Clinics NREAD

4



T- 6280/4 HEADQUARTERS, MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA DATE 12-7-87 Deputy DATE <u>/2-7-87</u> From: Assistant Chief of Staff, Facilities To: <u>Natural Resources</u> Subj: Waste Orl Mgmt Denny Affichedis Adstre. proposal to transfer schi foretrind. Bese Maintenence conter Brogosal 15 also attached. Request review comments/concurrence Tegands Sollator



GPNAV 5216/144A (Rev. 8-81) S/N 0107-LF-052-2320 **DEPARTMENT OF THE NAVY**



DATE: 0 4 DEC 1987

628Ø MAIN

FROM: Base Maintenance Officer

TO: Assistant Chief of Staff, Facilities

SUBJ: WASTE OIL MANAGEMENT AND EQUIPMENT SUPPORT FOR FORESTRY/ WILDLIFE

Encl:

(1) Draft Action Brief

(2) Proposed Enclosure to Draft Action Brief

1. After discussing forestry and wildlife support with members of Base Maintenance, the following is offered:

a. Rarely does equipment support involve a single operator. Most support roles require more than one person.

b. Much of the support provided by Base Maintenance is seasonal. Accordingly, a single operator would be incapable of providing for NREAD's needs during periods of intense requirements. During the off season, the operator may be used in jobs requiring less than the WG-10 operator skill connotes. Accordingly, it is recommended that the transfer of one equipment operator and equipment for forestry and wildlife be held in abeyance. If you wish to pursue the transfer, however, Base Maintenance will support it.

2. The action brief can be changed to delete forestry and wildlife with minor surgery.

3. It is recommended that the enclosure to enclosure (1), proposed action brief, be replaced with enclosure (2), attached hereto. It is believed that everyone involved will be wellserved by more definitive guidelines. The bracketed portion of the first recommendation should read "(see attached functions, assignments, and transfer requirements, ".

G. LILLEY

lase l'aintenance Officer.

Assistant Chief of Staff, Facilities

WASTE OIL MANAGEMENT AND EQUIPMENT SUPPORT FOR FORESTRY

(2) Frogosed Unclosure to D aff Action Brief

Aftra discussing forestry and wildlife support with mambers of Base Maintenance, the Collowing in offered;

a. Ramaly does equipment support involvo a single operator. Most support roles require sor than one preson.

b. Much of the support provided by Base Maintenence is seasonal. Accordingly, a single operator would be incapable of providing for MRIAD's meeds during particle of intense requirements. During the off season, the potrator may be used to dobe requiring loss than the WG-10 operator still conners. Accordingly, it is recommended that the transfer of one equipment operator and equipment for forestry and wildlife be held in aboyance. If you wish to pursue the transfer, however, base harintenance will support it.

 The aution brief can be changed to delete forestry and willing with miner suggry.

31 It is recome aded that the enclosure to enclosure (1), eroposed action brief, bo copleced with eclosure (2), attached hereto. It is believed that everyone involved will be wellserved by more definitive guidelincs. The bracketed portion of the first recommendation should read "(see attached functions, assignments, and transfer requirements.)"

M. G. LELLEY

NY LM

HEADQUARTERS, MARINE CORPS BASE, CAMP LEJEUNE

ACTION BRIEF

Staff Section:

Date: NOV 2 0 1887

Problem: Waste oil management and equipment support for forestry/ wildlife

Background/Discussion: Waste oil management includes collection, storage and disposition of oil; inspection of separators; monitoring oil storage tanks; testing for content; etc. The operational requirements of waste oil management (cleaning, collection, maintenance, etc.) has been assigned to Base Maintenance with staff assistance (inspections, testing, etc.) provided by Natural Resources Division. Waste oil can easily become hazardous waste when/if contaminated. The collection, storage and disposal process then becomes more complicated and entangled with state and federal regulations and laws.

Because of the complexities associated with waste oil and hazardous waste, it is desirable that the entire function be placed under a single organizational entity to the maximum extent possible. The resource recovery program, including metals, paper, cardboard, etc., is assigned to Natural Resources. Thus, it appears logical to assign the waste oil management program to NREA so that waste oil could be integrated into the overall resource recovery program.

Equipment support for forestry and wildlife has been provided by Base Maintenance. Because of the nature of the function; e.g., forestry and wildlife are revenue generating programs, equipment to support these functions has been procured with forestry/wildlife funds. This equipment is "set aside" and used only for support of these two programs. Operators and maintenance are provided by Base Maintenance heavy equipment unit. The competition for operators for equipment from the heavy equipment unit often leaves the forestry/ wildlife equipment without operators. The forestry/wildlife programs are time sensitive due to seasonal requirements, thus, making a less than satisfactory situation.

A third problem area in the NREA organization is budget and financial management. NREA was separated from Base Maintenance in approximately 1981 and established as a division reporting directly to the AC/S, Facilities. The financial resources to support NREA remained with Fund Administrator 23, Base Maintenance. Thus, the situation was (and is) that the Natural Resources Officer is responsible to the AC/S, Facilities but must obtain funding through a peer organization. WEDLER, MARCHE CORPS BARRY, CLARK WARD, CONTRACT

Parit Gertun Parit Gertun Probies Series of research and quirmant correct for farmery

Prokyround/rinoatitor: samte if brancomunicatives collection, seriesge a collection of the state of the practice of same cost and the statesge a collection of the state of the state of the books of the right an above the state of the same. Collection of a state the books of the state of the books of the state of the state the books of the state of the books of the state of t

3. Line group meet in the LLN augmination if course in the equal purchases in the second and the course of the approximately diet entry is don't depreciate the second of the test is synthesis and entry is don't at taboarder in suproficience of an arrest is run addition taken of the mathematic second of the courses (run is) the mathematic is at the second of the second of the synthesis of the mathematic is at the second of the synthesis of the mathematic is at the second of the synthesis of the second of the second of the second of the synthesis of the second of the second of the synthesis of the synthesis of the second of the second of the synthesis of the second of the second of the second of the synthesis of the second of the second of the second of the synthesis of the second of the second of the second of the synthesis of the second of the second of the second of the synthesis of the second of the second of the second of the synthesis of the second of the second of the second of the synthesis of the second of the se Subj: WASTE OIL MANAGEMENT AND FORESTRY/WILDLIFE HEAVY EQUIPMENT SUPPORT

Recommended Action:

1. Transfer waste oil management to Natural Resources (see attached for functions included).

2. Transfer forestry/wildlife equipment operators to Natural Resources (see attached for functions included).

3. Create a separate fund administrator for Natural Resources with total financial management responsibilities.

B. W. ELSTON

Deputy, Assistant Chief of Staff, Facilities

Recommendation:

		CONCUR	NON-CONCUR	DATE
BMO	#1 #2 #3			-
MREAD	#1 #2 #3			
AC/S, Comptroller: Recommendation	#3		<u> </u>	<u>> 1700</u>
		APPROVED	DISAPPROVED	
AC/S, Facilities	#1 #2 #3		·····	

2

WARD STILL APPROXIMATES FOR GALL METHODALAN STILL TO STATE and a start of the second second second second . Traduker site oli nag sumut to Matu 14 source queen 10, traduker del - 5). 2. «The source conservation of several methods to satural A CARGAN CAR STORE A STAR STAR STAR STAR STAR STAR STAR and the second start the second second California and Chivalette and Anna and

TRANSFER OF WASTE OIL MANAGEMENT FROM BMO TO NREAD

FUNCTIONS

RESOURCES

Waste oil collection, storage & disposition Equipment: 1-Vac-All truck 3-oil collection trks Personnel: 2-Vac All operators 1-trk oper-Skimmer 1-laborer 1-Supv (must come from NREAD)

Included in resources

heavy equipment support

above. Will require

on large separators, such as Boat Basin,

Maintenance of separators, including skimming, cleaning and inspection

Response to oil spills

except additional support would come from heavy equipment, etc.

Included in above

Monitor oil storage tanks and monitoring wells

Burns pits for firefighter training -collect run off

PCB Transformer Program

Forestry/Wildlife heavy equipment support l-Equipment Operator (FY-87 Records indicate 1.15 man years expended in forestry/ wildlife)

COMMENTS/RECOMMENDATIONS

Equipment personnel to be transferred from BMO except supervisor must come from NREAD

Base Maintenance will provide necessary support

NREAD would assume lead role

NREAD would provide management and record keeping

Transfer one equipment operator from Base Maintenance

No additional

Courthouse Bay

No additional

No additional



FUNCTIONS

Parking/storage of vehicles and equipment

Space for personnel/ shop area

Budgeting/financial management

RESOURCES

Bldg. 1103 and 1102

1-Budget Clerk

Heavy equipment lot and parking lot between bldgs. 1102 and 1103

COMMENTS/RECOMMENDATIONS

Utilize parking facilities at heavy equipment to continue parking low beds/dozers. Assign lot between 1102/1103 to NREA.

Assign bldgs. 1102 and 1103 to NREA.

Transfer a billet from Base Maintenance

2

COMARTIC/RECOMPTION COMP

PERSONAL HERODORCES

SUDET SHOP

Parling/sugradion hosty clubtent los (01) lue mining vercies and chip - an parking tot between Corintate - Cher man: Didgs, 1972 and 1979 equipment to convel privas eduli Asé asisso abad

antwork in the twitch AND OF SOLL

Do we want to transfer the equipment on the accountable records?

mina con ?

40

FUNCTIONS

Parking/storage of vehicles and equipment

RESOURCES

Heavy equipment lot and parking lot between bldgs. 1102 and 1103

COMMENTS/RECOMMENDATIONS

Utilize parking facilities at heavy equipment to continue parking low beds/dozers. Assign lot between 1102/1103 to NREA.

Space for personnel/ shop area

Bldg. 1103 and 1102

Assign bldgs. 1102 and 1103 to NREA.

Budgeting/financial 1-Budget Clerk management

Transfer a billet from Base Maintenance

HESOCIACES CONHERE / RECOVER DATES

TUNC TOUS

Paring/sucression notyge signent dot utilize purking to the contract dot to the contract of th www.prings.com.p we bede/house car in Asatom Jot De Linea

A LEM CI SOFT SOET

Asiiqa ilug . 110 and 1103 Lo Mila. Space for Let most Mag. 1102 and 1102 THIN COM

Sugar Charles (al 4 ... 1400 dec Clerk Spille a resenset com Jas fain-benance สกองอุปอกอกป
TRANSFER OF WASTE OIL MANAGEMENT FROM BMO TO NREAD

FUNCTION	RESOURCES	NREAD	MAINTENANCE :
Waste oil collection	<pre>1-Supervisor 3-WG-7 Motor Veh Operators 2-Laborers 1-VacAll truck 2-Oil collection trucks 1-Oil skimming truck 1-1200 gal relocatable tank for storage of questionable material Storage tanks, accessory buildings and structures: S-888 S-889 S-890 S-890 S-891 STT-61 STT-62 STT-63 STT-64 STT-65 S-781 Accessory buildings and structures assoc- iated with the above storage tanks</pre>	 Assume total man- agement and execution for collection, storage, dis- posal and administration of waste oil. Request AC/S, Comptroller to assign NREAD as Program Ad- ministrator for Class II property. Assign Program Supervisor from inhouse assets. 	1. Transfer equipment and billets to estab- lish 3 Vehicle Opera- tor and 2 Laborer positions to NREAD.
Maintenance of oil- water separators, including skimming, cleaning and inspec- tion.	2-Oil skimmers 1-Air pump	 Assume operational support of all oil-water separators to include skimming, cleaning and inspection. Request assistance from BMaint for heavy equip- ment support on large separators such as Boat Basi Courthouse Bay 	 Transfer equipment. Provide heavy equipment support as requested.



FUNCTION	RESOURCES	NREAD	MAINTENANCE
Oil and hazardous material spill response	Preloaded trailer loaded with 500 ft. of floating boom, matting, pom pom, hand tools, drumss for hazardous material, absorbent, etc.	 Provide first response for containment and clean- up of spills. Request assistance for heavy equipment or labor for spills beyond own capability from Base Maintenance. 	1. Provide assistance as requested.
Administration of monitoring well program.	No additional	1. Assume responsibility.	1. None.
Servicing containment basins at Fire Pro- tection Division burn pits used for fire fighter training	No additional	1. Assume responsibility.	1. None.
Monitoring and disposing of PBC transformers	Dedicated area in Lot 140	 Maintain inventory of all PBC transformers in use at CLNC. Assume custody of PBC transformers from Base Maintenance or from con- tractors that are taken out of service. Dispose of PBC trans- formers that are no longer required at CLNC. 	 Assign dedicated area in Lot 140 to NREAD for temporary storage of PBC trans- formers awaiting disposal. Notify NREAD of any change of "in use" PBC transformers or PBC transformers held by Base Maintenance.



FUNCTION	RESOURCES	NREAD	MAINTENANCE
Office Space	All of Bldg 1103 not assigned to Special Services	1. Assume custody of Bldg 1103.	1. Assist with re- assignment of Bldg 1103.
		2. Request AC/S, Comp- troller to transfer Bldg 1103 to NREAD.	2. Move Plumbing Shop to Bldg 1102.
Budget/Financial	Budget Clerk	1. Assume total respon- sibility for budgeting, financial management, and administration of funds assigned to NREAD and Environmental Engineer.	1. Transfer one billet from Base Maintenance to NREAD for the estab- lishment of a budget clerk.
Vehicle Parking	Parking lot between Buildings 1102 and 1103.	 Utilize parking now assigned. 	1. Park only vehicles from Shop 61 and 62 in space between Building 1102 and 1103.



6240 NREAD 1 Jul 87

- Director, Natural Resources and Environmental Affairs From: Division, Marine Corps Base, Camp Lejeune Base Maintenance Division, Electrical Distribution Shop, To: M&R
- Juny East PCB TRANSFORMER QUARTERLY INSPECTION OF 9, 16, AND 17 JUN Subj: 1987, PERFORMED BY HERMAN IRELAND, ELEC DIST AND TOM BARBEE, NREAD
- (a) 40 CFR 761 Ref:
- Encl: (1) Notes on PCB Inspection

1. The quarterly PCB transformer inspection has been completed. Discrepancies were noted and are provided as the enclosure. Ongoing action by addressee is required to maintain compliance with the PCB regulations contained in the reference.

Point of contact is Mr. Tom Barbee, NREAD, ext. 5977. 2.

J. I. WOOTEN

Copy to: AC/S, FAC BFireProtection Div Provide a state of the state Provide a state of the Provide of the state Provide of the state Provide of the state of

in aptropart in order of says in

A la contract; l'04 the callerest contract of a contract the contract of a contract the contract of a contract of the con

These serves there is an an in the server and the server is the server as the server is the server is the server

1. Rusted transformer oil tanks may become a significant problem in the future. On several of the pad-mounted transformers, rust is attacking the metal of the bottom edge of the tank. This poses a risk of a major PCB spill. Transformers with serial numbers 2 PXC 49674 through 5 PXC 49674 located near building numbers FC-400, FC-411, FC-412 and FC-414, should have the rust scraped away and surfaces repainted.

2. Transformer serial number G 854205 is located inside the machinery room of Building HP-460, a Dental Clinic. The room's being cluttered with compressors and other equipment needed to operate instruments and machines in the clinic makes it difficult to inspect the transformer properly. That transformer should be replaced with a non-PCB transformer, preferably outside.

3. PCB transformer 8036878 is located inside a room of Bldg. 900. One of the interior walls is not a firewall. It should be replaced with a fire-rated wall and door.

4. There are three PCB transformers in the equipment room of Building 901. This room is separated from the maintenance area by only a tall steel wire fence. Any rupture of a transformer, could spray the entire area with PCB oil. A firewall should be built to totally enclose the transformer.

5. At FC-412, an air handler (or chiller unit) and a PCB transformer, serial number 3 PXC 49674 are in some danger of being damaged by a dead tree (10" diameter x 40' in height). The tree is leaning in their direction (about 5 degrees) and should be removed before it falls.

6. PCB transformer 4 PXC 49674 is located outside FC-414. As previously recommended, four corner guard posts have been erected to help protect if from mowers and other vehicles. Five shrubs and one holly sapling have been planted too close to the transformer and pad. As they grow, they will both hinder inspections in the future and possibly cause the concrete pad to crack. They should be moved.

7. PCB transformer S/N 61J15395 is located at BB-52. It has leaked about two ounces of oil from a bushing onto the case and onto the concrete pad. The leak appeared to have stopped. It needs cleanup/repair.

8. PCB transformer S/N F-964670 is located in its own room at AS-4108. The same two discrepancies noted in previous quarterly inspections have yet to be corrected. One is a vent 2' x 2' in an interior wall connected to an adjacent office. This vent should be removed and the hole filled in with concrete blocks. The other is the presence of combustibles in the room. Five pieces of lumber about six feet long should be removed immediately.

9. The Tap Change on PCB transformer S/N 5638275, located outside Bldg. AS 3620, has leaked about two ounces of oil onto the concrete pad. This needs cleanup.



10. The Tap Change on PCB transformer S/N 5538055, located on the parking lot outside AS-3502, has leaked approximately 1/2 ounce oil onto the valve directly below it. This needs cleanup/repair. Since this transformer is on a parking lot, it is recommended that concrete-filled steel posts be installed to protect the transformer on the sides facing the parking lot.

11. PCB transformer S/N 5538054 is located on the parking lot outside AS-3504. Steel guard posts have been erected as recommended. The tap change has leaked approximately 1/2 ounce onto the asphalt pad. This needs cleanup/repair.

12. The Tap Change on PCB transformer S/N 74V5680, located outside Bldg. AS-901, has leaked a very small amount of oil down the side of its case. This needs to be cleaned up/repaired.

13. The Tap Change on PCB transformer S/N 37584, located outside AS-705, has leaked a very small amout of oil down the side of the transformer case. This needs cleanup/repair.

14. PCB transformer S/N 6740378 is located outside AS-205. There appears to be a very small amount of oil on the concrete pad directly below the valve. This needs cleanup/repair.

15. Ten PCB transformers in permanent storage at Lot 140 need to be marked with date removed from service.

16. Two barrels in permanent storage at Lot 140 need to be marked with the date they were first used for storing PCB articles/liquids. If they must be marked accordingly. That is between 50 ppm and 500 ppm would be labeled "PCB Contaminated" and greater than 500 ppm would be labeled with the EPA approved PCB mark.

17. One transformer in temporary storage (outside on concrete pad) is leaking. It needs to be placed in a drip pan and covered with plastic to keep out the rain.



6240/2 NREAD 4 Jun 87

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

Subj: WASTE OIL STORAGE TANK AT BUILDING 45; ANALYSIS OF

- Ref: (a) Dir M & R memo 6240 MAIN dtd 9 Jan 87 (b) BO 6240.5A
- Encl: (1) JTC Environmental Consultants, Inc., Report #559 (2) JTC Environmental Consultants, Inc., Report #559 addendum Table #1

1. As requested in reference (a), four samples were taken by NREAD of the large waste oil storage tank located next to Building 45. The samples were numbered 87-31 through 87-34. Sample #87-31 was taken from the bottom layers of oil in the tank. Sample #87-34 was taken just below the surface of the oil in the tank. Samples #87-32 and #87-33 were taken from middle layers of oil in the tank.

2. Based on data contained in enclosures (1) and (2), the contents of the tank are regulated as a hazardous waste fuel by regulations outlined in reference (b). The majority of the subject waste oil appears to be suitable for burning for recovery of energy based on information provided by Oldover Corporation, Aquadale, North Carolina. Oldover is currently highly regarded by the State Hazardous Waste regulatory establishment as a mechanism for disposal of this type of waste. Based on information provided by Mr. Paul Hubbell, CMC (Code LFL), DRMO's cost of disposal will be reimbursed by higher headquarters. Cost in excess of \$250,000 is likely.

3. It is recommended that the subject oil be turned in to DRMO for disposal, and that DRMO be requested to remove the entire contents of the subject tank. It is likely that the bottom layer will require separate disposition due to Chromium and water content.

4. The tank should also be evaluated/tested for suitability for storage of waste oil prior to reuse. Point of contact is Danny Sharpe, extension 5003.

> D. D. SHARPE Acting

Copy to: DRMO AC/S, FAC

Partial Report CASE # 559 LABORATORY ANALYSIS ON NAVAL SAMPLES (A/E CONTRACT N62470-84-B-6932) ° JTC REPORT # 87-126

PREPARED FOR: DEPARTMENT OF THE NAVY ATLANTIC DIVISION NAVAL FACILITIES ENGINEERING COMMAND

NORFOLK, VA 23511

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

APRIL 17, 1987

Ann E. Rosecrance Laboratory Director



JTC Environmental Consultants, Inc.

Location:	Camp Le	jeune		Date of Red	ceipt:3	-18-87	furnaround	: routin	1e
Date: 4-1-	1-87 Repo) rt No. <u>55</u>	59	to Naval 1	Facilities	Engineerin	ng Command	Norfolk	Virginia
JTC Data Re	port No	87-126	_ Table					,	· irginic
NAVY	JTC	1	1. J. S.	101 101	ANALYSIS	PARAMETER	ing in the second second		
SAMPLE ID	SAMPLE ID	Flashpoint	TOX	Corrosivity pH	PCB -ug/g			At an I	
87-30 oil layer	12-4514	55	0.07%	**	<5				
87-30 water layer	12-4514	+	572 mg/	7,32	+				
87-31	12-4515	57	0,25%						
87-32	12-4516	50	0.25%						
87-33	12-4517	50	0,24%						

** unable to do analysis due to oil matrix

57

0.17%

12-4518

87-34



Location: <u>Camp Lejeune</u> Date of Receipt: <u>3-18-87</u> Turnaround: <u>routine</u> Date: <u>4-17-87</u> Report No. <u>559</u> to Naval Facilities Engineering Command, Norfolk, Virginia JTC Data Report No. <u>87-126</u> Table <u>2</u>

NAVY	JTC		ANALYSIS PARAMETER					
SAMPLE ID	SAMPLE ID	Water 70	Sediment 70	Sp. Gravity g/ml	Viscosity @70°F, cSE.	BTU per 16,		
6 7-31	12-4515	11.0	0.38	0.81	28.6	17,000	and the	
87-32	12-4516	10,7	0.40	0.81	27.9	17,100		
87-33	12-4517	10.5	0,37	0.83	26.0	17,100		
87-34	12-4518	6,40	0.20.	0,76	21.0	18,000		9
•								



REPORT # 559 Addendum LABORATORY ANALYSIS ON NAVAL SAMPLES (A/E CONTRACT N62470-84-B-6932) JTC REPORT #87-126

PREPARED FOR: DEPARTMENT OF THE NAVY ATLANTIC DIVISION NAVAL FACILITIES ENGINEERING COMMAND NORFOLK, VA 23511

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

APRIL 29, 1987

Inn E. Rosecrance



and antitionmental consuldits, inc.

Location: <u>Camp Lejeune</u>	Date of Receipt: 3-18-87 Turnaround:	toutine.
Date: 4-29-87 Report No. 559	_ to Naval Facilities Engineering Command,	Norfolk, Virginia
JTC Data Report No. 87-126 Table_		

NAVY	JTC				ANALYSIS	PARAMETER			
ID	SAMPLE	As ug/L	Ba ug/L	CdugIL	Crug/L	Pb ug/1	Hg	Se	Ag
87-30 oil layer	12-4514	<2700	3530	<1500	710	19,500	<0.1	< 860	< 8920
87-30 water layer	12-4514	< 500	180	425	150	-250	<2,0.ug	<570	<50
87-31	12-4515	<2700		<1500	21,000	63,800			
87-32	12-4516	-2700		<1500	1850	62,100			
87-33	12-4517	<2700		<1500	1690	60,200			e <u>- 1-10 - 1</u> 0 - 1 <u>0</u>
87-34	12-4518	<2700		<1500	1350	67,500			



Location: <u>Camp Lejeune</u> Date of Receipt: <u>3-18-87</u> Turnaround: <u>routine</u>. Date: <u>4-29-87</u> Report No. <u>559 Add</u> to Naval Facilities Engineering Command, Norfolk, Virginia JTC Data Report No. <u>87-126</u> Table <u>2</u>

NAVY	JTC			ANALYSIS	PARAMETER	 	
SAMPLE ID	SAMPLE	Cyanide.	<u>tivity</u> Sulfide				
87-30 cil layer	12-4514	<0.5 mg/kg	NA				
87-30 water layer	12-4514	~10 mg/L	850 mg/				
			-				
					aus and a		

NA= not available, result will be reported in separate addendum



6280 FAC 31 DEC 1985

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

Subj: DEFENSE ENVIRONMENTAL STATUS REPORT (DESR)

Ref: (a) PHONECON btwn Mrs. Huber, CMC/LFL and Mr. Alexander, Fac, MCB dtd 19Dec85

Encl: (1) MCB, Camp Lejeune DESR, FY-85

1. The enclosure provides hard-copy follow-up for the completed report given by phone during the reference. For clarification or additional information, please contact Mr. Bob Alexander, MCB Environmental Engineer at AV 484-3034.

> R. A. TIEBOUT By direction

Blind copy to: NREAD EnvEngr 2881 DEC 1985

Bar and

participant and a second s

Sellin.

and the second of the second De sportent a

AIR COMPLIANCE STATUS

Period Covered: FY	85	Activity:	MCR, CAMP LEJEUNE
Compliance D	ata	As of Last Period	As of Current Period
 Number of major a sources 	ir pollution		
A. In being			
B. Out of compli	ance		0
2. Number of <u>minor a</u> <u>sources</u> *	ir pollution		
A. In being			
B. Out of compli	ance		0
3. Number of <u>notices</u> (NOV) *	of violation		1
A. Number unreso start of peri	lved at the od		0
 NOVs whic administr ational c resolve 	h require ative or oper- hanges to		
2. NOVs whic lution ab Project(s	h require pol- atement) to resolve		
B. Number of NOV period (on a paper provide ation for eac	s received during separate sheet of a brief explan- h NOV received)		1
 NOVs whic administr ational c resolve 	h require ative or oper- hanges to		1
 NOVs which lution aba Project(s) 	require pol- tement to resolve		0
C. Number of NOV period	s resolved during		1



WASTEWATER COMPLIANCE STATUS

		Compliance Data		As of Last Period	As of <u>Current Period</u>
•	Num dis	ber of NPDES <u>Permitted</u> charges*			
_	Α.	In being (major/minor)		. /
	в.	Out of compliance (major/minor)		·/	/
		1. Number that exceed standards (major/majoor/major/majoor/majoor/majoor/majoor/majoor/majoor/majoor/maj	ds minor)	/	
		 Number for other : (major/minor) 	reason	<u>/</u>	
•	Num (NO	ber of notices of viola Vs)	ation		
	Α.	Number of NOVs unresolution the start of period	lved at		0
		1. NOVs which require administrative or operational change to resolve	e es		
		 NOVs which require pollution abatemen project(s) to reso 	e nt olve		
1	B.	Number of NOVs receive ing period (on a separ sheet of paper provide explanation of each NO	ed dur- rate brief DV)		0
		 NOVs which require administrative or operational change to resolve 	9		
		 NOVs which require pollution abatemer project(s) to reso 	e nt olve		
C	с.	Number of NOVs resolve during period	đ		ð

REPRODUCED AT GOVERNMENT EXPENSE



SAFE DRINKING WATER PROGRAM

Per	fod	Covered: Fy 05 Activ	ity MCD, CA	MP LEJEUNS
		PROGRAM DATA	AS OF LAST PERIOD	AS OF CURRENT PERIOD
1.	num A.	ber of water treatment systems where standards were exceeded during period		4
	в. С.	where <u>notification</u> * was made where problem was corrected		<u>1</u> 3
2.	num (in sta	ber of purchased water supplies cluding federally supported te or locally owned)		
	A. B.	where standards were exceeded where prob_em was corrected		0
3.	Not: DOD A.	ices of Violation (NOVs) (for own systems only) number of NOVs unresolved at start of period		
		istrative or operational changes to resolve	•	0
	P	lution abatement project(s) to resolve received during		D
	ь.	start of period. (On a separ- ate sheet of paper, provide a brief explanation for each NOV) 1. NOVs which require admin-		
		istrative or operational changes to resolve 2. NOVs which require pol-		ø ¹
	C.	lution abatement project(s) to resolve		0
		during period 1. by administrative or		
		operational methods2. by pollution abatement projects		
				0

REPRODUCED AT GOVERNMENT EXPENSE



OIL AND HAZARDOUS SUBSTANCE SPILLS SUMMARY

Period Covered: FY 85	Activity:	MCB, CAMP LEJEUNE
Spill Data	As of Last Period	As of current Period
1. SPCC* Status		
A. Date written plan was certified by professional en- gineer		AUGUST, 1983*
B. Construction actions incom- plete		0

* contract awarded DEC'85 For updated Plan June'86.

REPRODUCED AT GOVERNMENT EXPENSE


HAZARDOUS WASTE COMPLIANCE STATUS

Period	Covered: FY 85	Activity: MCC	CAMP LEJEUNE
	Compliance Data	As of Last Period	As of Current Period
1. Nu	mber of <u>facilities</u> *		11
Α.	Treatment*		D
в.	Storage*		1
c.	Disposal*		0
2. Nu (N	mber of notices of violation OVs)		2
Α.	Number of NOVs unresolved at the start of period		0
	 NOVs which require administrative or operational changes to resolve 		
	 NOVs which require pol- lution abatement project(to resolve 	s)	
в.	Number of NOVs received dur- ing period (on a separate sheet of paper provide a brie explanation for each NOV)	£	2
	 NOVs which require administrative or operational changes to resolve 		0
	 NOVs which require pol- lution abatement project(s to resolve 	s)	0
c.	Number of NOVs resolved during period	3	Z
	 By administrative or operational method 		2
	 By pollution abatement Project(s) 		0

REPRODUCED AT GOVERNMENT EXPENSE



SOLID WASTE LANDFILL (NON-HAZARDOUS) COMPLIANCE STATUS Period Covered: 85 FV Activity MCB, CAMP LEJEUNE AS OF AS OF COMPLIANCE DATA LAST PERIOD CURRENT PERIOD 1. number of active landfills A. permitted 1 B. not permitted 0 2. number of notices of violation (NOVs) A. number of NOVs unresolved at start of period 1. NOVs which require administrative or operational changes to resolve 0 2. NOVs which require pollution abatement project(s) to resolve 0 NOVs received during period в. (on a separate sheet of paper provide a brief explanation for each NOV) 1. NOVs which require administrative or operational changes to resolve 0 2. NOVs which require pollution abatement project(s) to resolve 0 c. number of NOVs resolved during period 1. by administrative operational methods 0 2. by pollution abatement project(s) 0

REPRODUCED AT GOVERNMENT EXPENSE

-1-



NATURAL RESOURCE PLANS, AGREEMENTS AND STAFF

Dor	iod Covere	d: FY_	85	Activity	MCO, CAMPLET	EUNE
			YEAR COMPLETED	COMPLETED IN CURRENT FY	TO BE COMP/UP FY+1 FY+2 FY-	DATED IN +3 FY+4
1.	Plans A. land B. fores C. fish/ life D. outdo reati	mgmt st mgmt wild- mgmt oor rec- .on	1975 1975 1975 1975 1975		FY+1 FY+1 FY+1 FY+1 FY+1	
2.	Agreement	S				
	A. fish/ life B. Outdo	wild-	1981		. FY+1	
	reati	on	1980		Fy + 1	
3.	Professio	nal Staf	<u>f</u> *			
		· On-S	ite			antanan gerapan dari dari dari dari dari dari dari dari
	Biologist Z	Forest 3	er Agronomi O	st Other	ECOLOGIST CHEMIST ENV. ENGR	-1 -1 -1
		Off-S	i+o**		ENV. PROT. SP	DEC1
	D ² - 1 ² - 1		ILE			
	Biologist	Forest	er Agronomi	st Other		All Long And
		0	. 0	0		
			· · · · ·			

*DOD personnel only



INSTALLATION ACREAGE SUMMARY

Por	icd Covered: FY 85	Act	tivity MCB, CAN	AP LETEUNE
		NUMBER OF ACRES	PUBLIC ACCESS ACRES	DOD ACCESS ONLY ACRES
1.	Available for hunting/ fishing	66,3.5.5	0	66,355
2.	Available for other outdoor recreation	0	0	0
3.	Outleased for agricul- ture/grazing	0	0	0
4.	Available for agricul- ture/grazing but not outleased	UNDETERW	NINED	
5.	managed forests	76,400	76,400	
6.	total installation acreage*	111,208		

REPRODUCED AT GOVERNMENT EXPENSE



CULTURAL RESOURCES MANAGEMENT SUMMARY

		YEAR COMPLETED	IN PROGRESS	NEEDED	NOT REQUIRED	
Doe	es your activity have					
A.	Overview*	1981				
Β.	Inventory/Survey* of 1. structures				**	
	2. archeological	100				
C	resources	1981		-		
с.	Advisory Council*			~ ~		
D.	Historic Preser-	Contraction of the second	na strange and	<u></u>		
	vation Plan/Segment*		1985/86			
Ε.	Plan Integrated/	The Party and The State		e		
	Coordinated*	The state of the second s	1985/86		and the second second	
		the second second			A - Properties	
Nun	ber of properties					
A.	listed on National				the second second	
-	Register*	0	0	_0	0	
в.	determined eligible	0	0	_ 0	0	
run	as	LAST PERIOD	CURRENT	PERIOD	PLUS 1	YR
Α.	requested 1. for plans, surveys inventories	51000	33,0	000	*** *·-	
Α.	<pre>requested 1. for plans, surveys inventories 2. for rehab* or</pre>	\$ 51,000	33,e \$ 28, e	200	\$ Approx. \$ 15,0	000
Α.	<pre>requested 1. for plans, surveys inventories 2. for rehab* or treatment</pre>	\$ 51,000 \$ 0	\$ <u>33,0</u> \$ <u>28,0</u> \$ 6	000	<u>\$ Approx. \$ 15,0</u> \$ 0	000
А. В.	requested 1. for plans, surveys inventories 2. for <u>rehab</u> * or treatment expended	\$ 51,000 \$ 0	<u>\$ 28,0</u> <u>\$ 0</u>	200	<u>\$ Approx.</u> \$15,0 \$ 0	000
А. В.	<pre>requested 1. for plans, surveys inventories 2. for rehab* or treatment expended 1. for plans, surveys inventories</pre>	\$ 51,000 <u>\$ 0</u> \$ 51,000	\$ <u>33,0</u> <u>\$ 28,0</u> <u>\$ 0</u> \$ 33,0		<u>\$ Approx.</u> \$15,0 \$ 0	000
A. B.	<pre>requested 1. for plans, surveys inventories 2. for rehab* or treatment expended 1. for plans, surveys inventories 2. for rehab* or</pre>	\$ 51,000 \$ 0 \$ 51,000	<u>\$ 33,0</u> <u>\$ 28,0</u> <u>\$ 0</u> <u>\$ 33,0</u>	000	<u>\$ Approx.</u> \$15,0 <u>\$ 0</u>	000
A. B.	<pre>requested 1. for plans, surveys inventories 2. for rehab* or treatment expended 1. for plans, surveys inventories 2. for rehab* or treatment</pre>	\$ 51,000 <u>\$ 0</u> <u>\$ 51,000</u> <u>\$ 51,000</u> <u>\$ 0</u>	<u>\$ 33,0</u> <u>\$ 28,0</u> <u>\$ 0</u> <u>\$ 33,0</u> <u>\$ 0</u>	200	<u>\$ Approx</u> .\$15,0 <u>\$ 0</u>	001
А.	<pre>requested 1. for plans, surveys inventories 2. for rehab* or treatment expended 1. for plans, surveys inventories 2. for rehab* or treatment</pre>	⁵ , <u>\$ 51,000</u> <u>\$ 0</u> <u>\$ 51,000</u> <u>\$ 0</u>	<u>\$ 33,0</u> <u>\$ 0</u> <u>\$ 33,0</u> <u>\$ 33,0</u> <u>\$ 0</u>	000	<u>\$ Approx.</u> *15,0 <u>\$ 0</u>	000
A. B.	<pre>requested 1. for plans, surveys inventories 2. for rehab* or treatment expended 1. for plans, surveys inventories 2. for rehab* or treatment</pre>	\$ 51,000 <u>\$ 0</u> \$ 51,000 <u>\$ 51,000</u> <u>\$ 0</u>	<u>\$ 33,0</u> <u>\$ 28,0</u> <u>\$ 0</u> <u>\$ 33,0</u> <u>\$ 0</u>	200	<u>\$ Approx</u> .\$15,0 <u>\$ 0</u>	000
А.	<pre>requested 1. for plans, surveys inventories 2. for rehab* or treatment expended 1. for plans, surveys inventories 2. for rehab* or treatment</pre>	5, <u>\$ 51,000</u> <u>\$ 0</u> 5, <u>\$ 51,000</u> <u>\$ 0</u>	\$ <u>33,0</u> <u>\$ 28,0</u> <u>\$ 0</u> <u>\$ 33,0</u> <u>\$ 33,0</u> <u>\$ 0</u>	200	<u>\$ Approx</u> .\$15,0 <u>\$ 0</u>	000
A. B.	<pre>requested 1. for plans, surveys inventories 2. for rehab* or treatment expended 1. for plans, surveys inventories 2. for rehab* or treatment</pre>	\$ 51,000 <u>\$ 0</u> \$ 51,000 \$ 51,000 \$ 0	<u>\$ 33, c</u> <u>\$ 0</u> <u>\$ 33, c</u> <u>\$ 33, c</u> <u>\$ 0</u>	200	<u>\$ Approx.</u> \$15,0 \$ 0	000
А.	<pre>requested 1. for plans, surveys inventories 2. for rehab* or treatment expended 1. for plans, surveys inventories 2. for rehab* or treatment</pre>	5, <u>\$ 51,000</u> <u>\$ 0</u> 5, <u>\$ 51,000</u> <u>\$ 0</u>	\$ <u>33,0</u> <u>\$ 28,0</u> <u>\$ 0</u> <u>\$ 33,0</u> <u>\$ 33,0</u> <u>\$ 0</u>	000	<u>\$ Approx</u> .\$15,0 \$ 0	0000
А.	<pre>requested 1. for plans, surveys inventories 2. for rehab* or treatment expended 1. for plans, surveys inventories 2. for rehab* or treatment</pre>	\$ 51,000 <u>\$ 0</u> <u>\$ 51,000</u> <u>\$ 51,000</u> <u>\$ 0</u>	<u>\$ 33,0</u> <u>\$ 0</u> <u>\$ 33,0</u> <u>\$ 33,0</u> <u>\$ 0</u>	000	<u>\$ Approx.</u> *15,0 <u>\$ 0</u>	000
А.	<pre>requested 1. for plans, surveys inventories 2. for rehab* or treatment expended 1. for plans, surveys inventories 2. for rehab* or treatment</pre>	5, <u>\$ 51,000</u> <u>\$ 0</u> 5, <u>\$ 51,000</u> <u>\$ 0</u>	<u>\$ 33,0</u> <u>\$ 28,0</u> <u>\$ 0</u> <u>\$ 33,0</u> <u>\$ 0</u>	000	<u>\$ Approx</u> .\$15,0 <u>\$ 0</u>	001



ENVIRONMENTAL AUDITING SUMMARY

Per	iod Covered: FY <u>05</u>	Activity	MCB, CAMP LEJEUNE
	COMPLIANCE DATA	AS OF LAST PERIOD	AS OF CURRENT PERIOD
1.	Does your activity participate in an <u>auditing program*</u> ? (multi media/single media)	No	NO
2.	Has your activity been audited? (multi media/single media)	NO	<u>ND</u>
3.	Did audit reveal any reportable violations? How many?	N/A	~/A
			the second state of the second state and the second state of the second state of the second state of the second



Part 3 - Glossary

Accountability (Accountability (

The Defense Property Disposal Office (DPDO) accepts accountability for property, to include hazardous materials and hazardous waste, when a DD Form 1348-1 has been accepted for such property. The property remains in the physical custody of the Component.

Station Contractor

Acres (Constant)

Number of acres identified and/or managed for a prescribed purpose, as described by definitions provided for Table 13.

Advisory Council (Control (

The independent agency mandated to advise the President and federal agencies regarding undertakings that may affect properties listed or eligible for listing in the National Register of Historic Places.

Agriculture/Grazing Outlease Program (Concord)

Program in which military land may be outleased under authority of 10 USC 2667.

Agriculture/Grazing Outleases (Machine Control)

- <u>Cash receipts</u> Cash rental receipts collected and deposited to the military departments' central accounts for this purpose. Excludes collections for performance bonds or collections placed in holding accounts for reimbursement to lessees for work performed.
- b. <u>Value of Services</u> The dollar value placed upon maintenance, protection, restoration and repair work performed by the lessee as a cash rental offset or reimbursed from rental collections.
- c. <u>Expenses</u> Expenses for administering the agriculture/grazing lease programs which are reimbursed from cash rental receipts. Include reimbursement expenses at all levels of command.
- d. <u>Investments Improvements</u> The value of improvements to or investments in tiple-use land management which are funded from the cash rental receipts.

reversites adentication and a state of the structure of the state as the

mar sideallogs of the list

Amour (Cashestan)

Include total burned.

Annual On-site Review (2000)

A review of an installation's pest management program by an authorized pest management professional, as required by DoDD 4150.7. VERNMENT EXPENSE

Auditing Program (CARDEN)

1-4-20-20-16-1

A program consisting of periodic environmental compliance review of facility operations, practices and records to assess and verify compliance with environmental laws and regulations. Audits range from one-time, single-media, audits to periodic, multi-media audits and should fall within the scope of the DoD interim policy guidance issued on January 17, 1985. Subject: Environmental Audits of Department of Defense facilities. The second second

Biennial On-site Reviews (Scheduled) (

On-site reviews of pest management programs every two years by pest management consultants. Biennial reviews may be scheduled when an installation's pest management program has met the criteria specified in DoDD 4150.7 plus any additional criteria established by the DoD Component.

Certified Applicators (Control)

An individual (military, civilian government employee, or contractor's employee) who is DoD-certified to use or to supervise the use of restricteduse pesticides covered by his or her certification.

Complete and Current (REALED)

Pest management plans which contain all the elements and other criteria specified in DoDD 4150.7, and which have been reviewed and updated (if necessary) within the past year.

Conforming Storage (DelSDEC)

Hazardous waste storage that conforms to applicable EPA and State hazardous waste regulations.

Contracts (Childer (Child))

lange and all the content is a star with a point of the start All contracts for pest control work or that include pest control. anne d<u>e la compana</u> and an aire a ser a

298 Fiddlam, Mr. 25 December 20 Martin Construction (1998)

NO A DOM STATES CALL STATES TO

Current Period (000) Datates)

Standard data element.

Custody (Cabie 68)

The Defense Property Disposal Office (DPDO) accepts custody of property, to include hazardous materials and hazardous waste, when in addition to accepting accountability, the property is physically transferred to the care and control of the DPDO.

content of the second of the second as indicate the

ALLOW TO ALCOMPTON

GOVERNMENT EXPENSE

anna sa bhi sun tartartar sa sai salarrani

Disposal (Debo

As defined by applicable regulations.

DoD Access Only (CERCES)

An installation with hunting/fishing or other outdoor recreation for only DoD personnel or for only DoD personnel and their guests.

Endangered Species Habitat (Statistics)

Installations with habitat used by federal or state listed endangered or threatened species.

Facilities (TADDAD)

Facilities refers to plants, buildings, or operations engaged in treatment, disposalor storage. Several hazardous waste facilities may be located on a single installation.

Fish and Wildlife Cooperative Agreement (

Having a current cooperative agreement for fish and wildlife conservation with US Fish and Wildlife Service and the appropriate state agency.

Forest Management Plan/Segment (States)

Having a current and approved plan for managing the installation's forests in accordance with DoDD 4700.1. The criteria for current and approved will be in accordance with the regulations of the military department concerned.

Forest Products (Contractor)

- a. <u>Gross Receipts</u> Actual collections from the sale of all forest products (e.g., pulp, sawtimber, fuelwood, pine straw, etc.) which have been deposited and accounted for in accordance with DoDI 7310.5. Do not include collections for performance bonds or receipts for sales contracts when the funds have not been collected and deposited (i.e., sales contracts with collection in the future as products are removed).
 - b. <u>Expenses</u> Expenses which have been reimbursed or funded from receipts collected from the sale of forest products and accounted for in accordance with DoDI 7310.5. In parentheses, show forest management expenses not reimbursed from receipts and funded from other sources (e.g., O&M and military pay).
 - c. <u>States' Entitlements</u> Amount disbursed to states in accordance with 10 USC 2665(e).

Generating, Generated, Generation, Generator (Contractor)

A hazardous waste generator as defined in EPA's hazardous waste regulations or corresponding authorized state regulations. I GOVERNMENT EXPE

Groundwater Contamination (Contamination)

Contamination as defined in 40 CFR 265.90 through 40 CFR 265.93 for interim status and 40 CFR 264.90 through 40 CFR 264.00 for full permit RCRA facilities.

Hazardous Substance Spills (Testieco)

Substances listed by EPA which meet characteristics and quantities (for reporting purposes) specified by EPA under Clean Water Act regulations.

Hazardous Waste (Store (B) (B) (B)

Wastes listed by EPA, or authorized state or local agencies, or which meet characteristics specified by EPA in its criteria pursuant to regulations under the Resource Conservation and Recovery Act.

Historic Preservation Plan/Segment

The documentation of historic properties management goals, procedures, and compliance implementation projects. Report only plans approved in accordance with military departments' regulations that implement DoDD 4710.1.

Hunting/Fishing Programs (1900)

Having, on federal lands controlled by the installation, either hunting or fishing for recreation or commercial purposes (includes trapping and shellfishing).

Installation

A grouping of facilities, located in the same vicinity, which supports particular functions. Installations may be elements of a base or complex. Normally, an installation is under the control of an individual installation commander.

NOTE: For purposes of Tables 13, 14, 15 and 16 only, installation is defined as follows:

A grouping of properties or facilities, located in the same vicinity, which are managed or administered as a unit.

的身份之外的

Integrated Natural Resources Program (Danker ())

All aspects of natural resources management that are applicable at a DoD installation or facility (i.e., forest, wildlife, outdoor recreation, soils, agriculture outleasing, etc.) are coordinated and in consonance. Implementation of all current and planned natural resources management activities will ensure compatibility within the natural resources program and with known mission activities and plans.

AL GOVERNMENT EXPENS

Integrated Pest Management (DONGOD)

A comprehensive approach to pest control or prevention that considers various chemical, physical and biological suppression techniques, the habitat of the pest, and the interrelationship between pest populations and the ecosystem.

Inventory/Survey (

Study that identifies and evaluates historic structures or archeological resources. Information is sufficiently documented to judge whether National Register criteria are met.

Land Management Plan (SOMESCE)

Having a current and approved plan for managing the soil, watersheds, wetlands, and other natural landscapes in accordance with DoDD 4700.1 and DoDI 4170.8. The criteria for current and approved will be in accordance with the regulations of the military department concerned.

Last Period

Standard data element. Enter as YYMMDD.

Major Air Pollution Source (CARDEDCOD)

EPA categorizes major air pollution sources as either "Class Al" or "Class A2."

- O Class Al: Sources with actual or potential controlled emissions, while operating at design capacity, equal to or greater than 100 tons per year of any federally regulated air pollutant (except lead, 5 tons per year).
- O Class A2: Sources with controlled emissions less 100 tons per year but with potential uncontrolled emissions, while operating at design capacity, equal to or greater than 100 tons per year of any federally regulated air pollutant (except lead, 5 tons per year).

A list of major air pollution sources has been provided to the components by EPA Headquarters.

Major Permitted Discharges (Contractor)

An installation with one or more "major" NPDES permitted discharges.

Major NPDES Permitted Discharge (CBADYCO2)

A NPDES permit which is classified by EPA as a "major." Any discharge out of compliance causes the permit to be out of compliance. A list of major NPDES permits has been provided to the components by EPA Headquarters. VERNMENT EXPE

in plant of the state of the second

Major Oil Spill (

A reportable oil spill which is either:

- over 100.000 gallons in coastal waters, or
- over 10,000 gallons in inland waters

Medium Oil Spill (Ortor)

A reportable oil spill which is either:

- between 10,000 gallons and 100,000 gallons in coastal waters, or
- ^o between 1,000 gallons and 10,000 gallons in inland waters

Minor Air Pollution Source (State)

EPA category "B." Any air pollution source with potential uncontrolled emissions less than 100 tons per year for any of the criteria pollutants (except lead, 5 tons per year).

Minor Permitted Discharges (Stable)

An installation with one or more NPDES permitted discharges, none of which is classified as major. 20511102184-0

Minor NPDES Permitted Discharge (TRODecc)

An NPDES permit which is classified by EPA as a "minor." Any discharge out of compliance causes the permit to be out of compliance.

1 - margaret - margaret and

277 1

DIRECTOR STREAM

Contra Mainten

L GOVERNMENT EXPENSE

Minor Oil Spill (Coope(S))

all stricted

1851年 - 1844、944代第四日的中心的世界中心。

Classic and a manager and a manager and the second second A reportable oil spill which is either:

o under 10,000 gallons in coastal waters

o under 1,000 gallons in inland waters

Mixed (Dibberg)

Physical mixing in storage NOT co-firing or duel-firing.

MOA (Date (D))

A signed document which describes what the installation will do to meet its obligations under the National Historic Preservation Act and related laws.

to avise first a stranger and any contract to

National Register of Historic Places (Deposite)

The listing of districts, sites, buildings, structures, and objects of national, state, or localsignificance in American history, architecture, archeology, and culture.

Net Revenue (Cobeco)

Gross revenue minus costs (may be negative)

NPDES Permitted Discharge (Concerc)

"A discharge included under a National Pollutant Discharge Elimination System (NPDES) permit or equivalent document issued by the Administrator of EPA or, where appropriate, by a state agency, after the enactment of the Federal Water Pollution Control Act Amendments of 1972. Where several discharges are included in the same permit, each discharge will be counted as a separate "NPDES Permitted Discharge"."

Notice of Violation (NOV) (ACCORDED)

An official written notice by EPA or an authorized State or local environmental regulatory agency of a violation of law or regulation.

Notification (200)

A public notification made pursuant to the Safe Drinking Water Act.

NPL (TODATO)

National Priorities List of Superfund sites, issued by EPA pursuant to the National Contingency Plan and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

On-site Natural Resources Manager (Consol)

Having a technically trained individual responsible for and actively involved in managing the natural resources program. On-site means that the individual is on the staff of the organization responsible for the day-to-day operations and maintenance of the installation.

Other Outdoor Recreation Programs (Carles (2))

Having, on federal lands controlled by the installation, a program to manage the recreational use of the natural environment for purposes other than hunting and fishing. Recreation facilities normally associated with urban areas, such as golf courses, athletic fields, tennis courts, and playgrounds, are not within this definition of outdoor recreation. Trail, birdwatching, picnic, beach, camping, and off-road vehicle areas are to be included.

Out of Compliance (COMPLED)

This is to be a self-assessment by the DoD component, and is independent of official NOV's. A condition in which a source is failing to comply with an applicable regulatory requirement which could be expected to result in an NOV if inspected by the appropriate regulatory agency.

GOVERNMENT EXPENSE

Outdoor Recreation Cooperative Agreement (Detector)

Having a current cooperative agreement for managing outdoor recreation resources or activities in accordance with the Memorandum of Understanding between DoD and Department of the Interior, April 7, 1978.

Outdoor Recreation, Hunting and Fishing (Costa (Cos

Hunting/Fishing Fees Collected - Fees collected, pursuant to 16 USC 670 a-f, from individuals participating in hunting, fishing, trapping or other wildlife harvest activities on a military installation.

Other Outdoor Recreation Fees Collected - Fees collected for use of other outdoor recreation facilities which are an integral part of and dependent upon the natural resource environment. Do not include fees solely for the use of equipment (e.g., skis, tents, boats, etc.) or a man-made facility (e.g., cabins, boat launch, pavillion, etc.).

Wildlife Program Expenses - Expenses for the administration and improvement of fish and wildlife management activities (including law enforcement and education programs) which are funded from receipts collected via hunting/ fishing/outdoor recreation fees and those which are funded from other sources(e.g., O&M).

Outdoor Recreation Plan/segment (

Having a current and approved plan for managing the installation's natural resources for outdoor recreation activities. The criteria for current and approved will be in accordance with the regulations of the military department concerned.

Overview (DDDD DD)

Basic study or report that summarizes existing information about an installation's historic and archeological proerties. It also indicates the likelihood of historic properties.

AL GOVERNMENT EXPENSE

Permitted (Cable Species)

A source for which a required permit to operate has been obtained from the appropriate regulatory agency.

Pests ()

Arthropods, birds, rodents, nematodes, fungi, bacteria, viruses, algae, snails, marine borers, snakes, weeds, and other organisms (except for human or animal disease-causing organisms) that adversely affect the well-being of man and animals; attack real property, supplies, equipment, or vegetation; or are otherwise undesirable.

Pest Control QAE (Date (D))

Quality assurance evaluators (inspectors) who are trained in accordance with DoD 4150.7-R and act as the contracting officer's technical representative

Qualifying Recycling Programs (Sector)

Programs designated by a DoD Component to use the proceeds from sales of recyclable materials to finance projects as described in 10 USC 2577. The programs must consist of organized operations exhibiting concerted efforts to divert or recover wastes, as well as identification, segregation, and maintenance of the integrity of recyclable materials to enhance their marketability.

Rehab (rehabilitation) (2005)

Efforts and resources to maintain, repair, reproduce, revitalize, or protect the significant characteristics that cause a property to qualify for listing in the National Register.

The contract of the for

1.3

L GOVERNMENT EXP

Regulations (Cathornes)

Laws and regulations promulgated under subtitle I of the hazardous and solid waste amendment of 1984 to the resource conservation and recovery act; include Federal requirements and state and local requirements. For 1985 only report data on compliance with State and local laws and regulations in effect on September 30, 1985.

Reported Pesticide Problem (Content)

A difficulty or incident with a pesticide which has been officially reported and which requires corrective action. The problem generally represents a violation of applicable law or compliance agreement.

Re-refining (Cableod)

Processing to remove impurities so that a product is again suitable for its original purpose.

and the sea

Response (Table 3)

As defined in Section 101 (25) of CERCLA.

Reviewed (Detrector)

During this report period, all aspects of natural resources management (i.e., forest, wildlife, outdoor recreation, land, etc.) at an installation were examined for policy compliance, technical accuracy, and compatibility within the program and with the mission (see Integrated Natural Resources Program).

SHPO (State Historic Preservation Officer) (TESTECTO)

The official authorized to administer the National Historic Preservation Act within a State or Territory.

Sites (200200)

As defined in the Installation Phase I Report.

to protect the government's interest through performance evaluation of commercial pest control contract.

Pesticide (Table ()

Any substance or mixture of substances, including biological control agents, that may prevent, destroy, repel, or mitigate pests, or control their development.

Pest Management Consultant (Constant)

Professional pest management personnel who provide technical and management guidance for the conduct of pest control operations. These government employees are located at DoD Component headquarters, major commands, engineering field divisions, or area support activities.

Pest Management Plans (

Installations' plans written in accordance with DoD 4150.7 to prevent and control pests which may adversely affect health, morale, or property.

Plan Integrated/Coordinated (DODE)

There is documented evidence, that the historic preservation plan has been integrated or coordinated with other appropriate installation planning efforts (e.g., master plan, comprehensive plan, new construction requests).

Potential to Increase (Table D)

Installation with natural resources suitable for but not currently being utilized as extensively as possible for a prescribed purpose (i.e., agricultural outleasing, hunting, commercial forestry, etc.).

Professional Staff (States)

Military officers or DoD civilians with undergraduate or graduate degrees in biological, agricultural, or physical sciences who are assigned responsibility for natural resources management programs, perform that assignment on a regular basis, and are employed as of 30 September.

- 27

AL GOVERNMENT EXPENSE

- <u>On-site</u> The professional is on the staff of the organization responsible for the day-to-day operations of an installation.
- <u>Oversight</u> The professional is on the staff of the organization responsible for overseeing, advising, or commanding management and operations at a group of installations.

atto de communer.

Public Access (Descention)

An installation providing access for hunting, fishing, or other outdoor recreation to all individuals regardless of whether they are employed by the Department of Defense.

Solvent Rental (States B)

Supplier owns the solvent and charges Installation for solvent service.

SPCC (Colored)

Oil and/or hazardous substance spill prevention, control, and countermeasures. SPCC plans are considered complete and current if they have been prepared and certified by a professional engineer on the required schedule. Projects required pursuant to SPCC plans are to be reported separately from the plans themselves.

in another

GOVERNMENT EXPENSE

Standards (())

Primary drinking water standards or other regulatory standards.

Storage (Tables)

In storage as of reporting date awaiting disposal.

Total Installation Acreage (Table Co)

Number of acres for which DoD has national resources management responsibility.

Treatment (Dabbe D)

As defined by the applicable regulations (treatment includes OB/OD ordnance which is classified as thermal treatment).

Note: For the purpose of Table 16 treatment is maintenance, repair, alteration, use protection recordation and data recovery of historic and archeological property for the purpose of compliance with historic preservation requirements.

Used Oil (Troles)

Oil with characteristics that have changed since being manufactured but that may be suitable for further use. The term includes contaminated fuels and lubricating oils (crankcase oil, cutting oil, gear lubricant, metal working lubricant, hydraulic oil, transmission fluid).

Used Oil Fuel (deb De SB)

Any non-virgin fuel containing a used oil item including solvents or any waste materials such as paints or thinners or any unused fuels mixed with any of theses items.

Used Oil Items (3333333)

Includes synthetic and mineral; motor oils, turbine oils, gear oils, hydraulic fluids, brake fluids and transmision fluids and antifreeze/coolant but excludes solvents, unused contaminated fuels, oils waste primarily water, and sludges.



User Fees From All (Designation)

An installation charging user fees to all participants for hunting, fishing or other outdoor recreation activities.

User Fees From Public Only (Corrector)

Only non-DoD employees are charged fees for hunting, fishing, or other outdoor recreation.

Virgin Fuel (Table 8) tale 0093 of international terror

Unless otherwise specified, purchased fuels may be considered virgin.

Wildlife Management Plan/Segment (

Having a current and approved plan for managing the installation's fish and wildlife resources in accordance with DoDD 4700.1. The criteria for current and approved will be in accordance with the regulations of the military department concerned.

A shirt and the the providence of the second of the second

in the set of the state of the

AND AND AND A LOUGH

The Association and

OVERNMENT EXPENS

interfaction of the statement of the second statement is the second statement of the second state

lar is bruit togan (nd strid approx). San fini (lanimation stricted) (") (sourget toisigned was san fini (langet toisigned togan) (langet to) string after strict

in wasing listics of the second of the base of second statistics in the second se

infle-regularizations ethnis adianations in and the set of the statement

44



Clase up This to interpret any underlined and starred terms in the

ort sata

Lense Envi Status

Act

Acr

e (DPDO) accepts accountability for rials and hazardous waste, when a DD Form roperty. The property remains in the

Sugar St. Sugar

A MARINE STREET

Address of the best and

12MGA BISS

QUERNMENT EXPENS

File with Johnse Europer Auto Julio De 15 snaged for a prescribed purpose, as described by definitions provided for Table 13.

Advisory Council (Caracters)

The independent agency mandated to advise the President and federal agencies regarding undertakings that may affect properties listed or eligible for listing in the National Register of Historic Places.

Glossary

Agriculture/Grazing Outlease Program (Decomp)

Program in which military land may be outleased under authority of 10 USC 2667.

Agriculture/Grazing Outleases (MADIADORD))

- a. <u>Cash receipts</u> Cash rental receipts collected and deposited to the military departments' central accounts for this purpose. Excludes collections for performance bonds or collections placed in holding accounts for reimbursement to lessees for work performed.
- b. <u>Value of Services</u> The dollar value placed upon maintenance, protection, restoration and repair work performed by the lessee as a cash rental offset or reimbursed from rental collections.
 - <u>Expenses</u> Expenses for administering the agriculture/grazing lease programs which are reimbursed from cash rental receipts. Include reimbursement expenses at all levels of command.
 - d. <u>Investments Improvements</u> The value of improvements to or investments in multiple-use land management which are funded from the cash rental receipts.

Terreten all virtheung faffallegaleinen Greenen gruberebe eine

Amount (Caragosta)

Include total burned.

Annual On-site Review (2000)

A review of an installation's pest management program by an authorized pest management professional, as required by DoDD 4150.7.



Part 3 - Glossary

Accountability (Bong (B)

and the start of

The Defense Property Disposal Office (DPDO) accepts accountability for property, to include hazardous materials and hazardous waste, when a DD Form 1348-1 has been accepted for such property. The property remains in the physical custody of the Component.

Acres (

Number of acres identified and/or managed for a prescribed purpose, as described by definitions provided for Table 13.

Advisory Council (Caroland)

The independent agency mandated to advise the President and federal agencies regarding undertakings that may affect properties listed or eligible for listing in the National Register of Historic Places.

Agriculture/Grazing Outlease Program (Date)

Program in which military land may be outleased under authority of 10 USC 2667.

Sec. St. Const.

ອີ້ນອີ້ນອີ້ 1 ມີ 1 ກຳລັດແອ້ອີ້ໃນອີ່ມີຊີ້ ເລີຍໃນກໍ່ມີ ການນັ້ນ ອີກກ່ຽວ, ອີກມີສີອຸກອີນອີກແອ້

A Real Provide to Send Sance

State State

- jeen to a wa ban, 1sh a

VERNMENT EXPENS

Agriculture/Grazing Outleases (DECORDOD)

- a. <u>Cash receipts</u> Cash rental receipts collected and deposited to the military departments' central accounts for this purpose. Excludes collections for performance bonds or collections placed in holding accounts for reimbursement to lessees for work performed.
 - b. <u>Value of Services</u> The dollar value placed upon maintenance, protection, restoration and repair work performed by the lessee as a cash rental offset or reimbursed from rental collections.
 - c. <u>Expenses</u> Expenses for administering the agriculture/grazing lease programs which are reimbursed from cash rental receipts. Include reimbursement expenses at all levels of command.
 - Investments, Improvements The value of improvements to or investments in multiple-use land management which are funded from the cash rental receipts.

Amour (())

Include total burned.

Annual On-site Review (2000)

A review of an installation's pest management program by an authorized pest management professional, as required by DoDD 4150.7.



Auditing Program (CBRED)

month at the to

A program consisting of periodic environmental compliance review of facility operations, practices and records to assess and verify compliance with environmental laws and regulations. Audits range from one-time, single-media, audits to periodic, multi-media audits and should fall within the scope of the DoD interim policy guidance issued on January 17, 1985, Subject: Environmental Audits of Department of Defense facilities.

Biennial On-site Reviews (Scheduled) (

On-site reviews of pest management programs every two years by pest management consultants. Biennial reviews may be scheduled when an installation's pest management program has met the criteria specified in DoDD 4150.7 plus any additional criteria established by the DoD Component.

Certified Applicators (Carton)

An individual (military, civilian government employee, or contractor's employee) who is DoD-certified to use or to supervise the use of restricteduse pesticides covered by his or her certification.

Complete and Current (RESERVED)

Pest management plans which contain all the elements and other criteria specified in DoDD 4150.7, and which have been reviewed and updated (if necessary) within the past year.

Conforming Storage (DEBIE)

Hazardous waste storage that conforms to applicable EPA and State hazardous waste regulations.

Contracts (Contractor)

All contracts for pest control work or that include pest control.

and the state of the second

and or head the set of all or and the set of the set of

Current Period (00000000000)

Standard data element.

Custody (table ()

The Defense Property Disposal Office (DPDO) accepts custody of property, to include hazardous materials and hazardous waste, when in addition to accepting accountability, the property is physically transferred to the care and control of the DPDO.

and the second

Carrie Maria

10

VERNMENT EXPEN

Disposal (

As defined by applicable regulations.



Groundwater Contamination (00000)

Contamination as defined in 40 CFR 265.90 through 40 CFR 265.93 for interim status and 40 CFR 264.90 through 40 CFR 264.00 for full permit RCRA facilities.

Hazardous Substance Spills (Der Deco)

Substances listed by EPA which meet characteristics and quantities (for reporting purposes) specified by EPA under Clean Water Act regulations.

Hazardous Waste (Dolo (B) (B)

Wastes listed by EPA, or authorized state or local agencies, or which meet characteristics specified by EPA in its criteria pursuant to regulations under the Resource Conservation and Recovery Act.

TIN TA

L GOVERNMENT EXPEN

the set of a statement with

state and the second

Historic Preservation Plan/Segment

The documentation of historic properties management goals, procedures, and compliance implementation projects. Report only plans approved in accordance with military departments' regulations that implement DoDD 4710.1.

Hunting/Fishing Programs (2000)

Having, on federal lands controlled by the installation, either hunting or fishing for recreation or commercial purposes (includes trapping and shellfishing).

Installation

A grouping of facilities, located in the same vicinity, which supports particular functions. Installations may be elements of a base or complex. Normally, an installation is under the control of an individual installation commander.

NOTE: For purposes of Tables 13, 14, 15 and 16 only, installation is defined as follows:

A grouping of properties or facilities, located in the same vicinity, which are managed or administered as a unit.

Integrated Natural Resources Program (Dankers)

All aspects of patural resources management that are applicable at a DoD installation or facility (i.e., forest, wildlife, outdoor recreation, soils, agriculture outleasing, etc.) are coordinated and in consonance. Implementation of all current and planned natural resources management activities will ensure compatibility within the natural resources program and with known mission activities and plans.



DoD Access Only (CDDSS)

An installation with hunting/fishing or other outdoor recreation for only DoD personnel or for only DoD personnel and their guests.

Endangered Species Habitat (Content)

Installations with habitat used by federal or state listed endangered or threatened species.

Facilities (

Har Chart

Facilities refers to plants, buildings, or operations engaged in treatment, disposalor storage. Several hazardous waste facilities may be located on a single installation.

Fish and Wildlife Cooperative Agreement (

Having a current cooperative agreement for fish and wildlife conservation with US Fish and Wildlife Service and the appropriate state agency.

Forest Management Plan/Segment (

Having a current and approved plan for managing the installation's forests in accordance with DoDD 4700.1. The criteria for current and approved will be in accordance with the regulations of the military department concerned.

Forest Products (Content)

- a. Gross Receipts Actual collections from the sale of all forest products (e.g., pulp, sawtimber, fuelwood, pine straw, etc.) which have been deposited and accounted for in accordance with DoDI 7310.5. Do not include collections for performance bonds or receipts for sales contracts when the funds have not been collected and deposited (i.e., sales contracts with collection in the future as products are removed). Sal and terrain
 - b. Expenses Expenses which have been reimbursed or funded from receipts collected from the sale of forest products and accounted for in accordance with DoDI 7310.5. In parentheses, show forest management expenses not reimbursed from receipts and funded from other sources (e.g., O&M and military pay).

the second second second

c. States' Entitlements - Amount disbursed to states in accordance with 10 USC 2665(e).

Generating, Generated, Generation, Generator (CREED)

A hazardous waste generator as defined in EPA's hazardous waste regulations or corresponding authorized state regulations.

F & 200 2 2

T GOVERNMENT EXPE


Integrated Pest Management (100100)

A comprehensive approach to pest control or prevention that considers various chemical, physical and biological suppression techniques, the habitat of the pest, and the interrelationship between pest populations and the ecosystem.

Inventory/Survey (

Study that identifies and evaluates historic structures or archeological resources. Information is sufficiently documented to judge whether National Register criteria are met.

Land Management Plan (

Having a current and approved plan for managing the soil, watersheds, wetlands, and other natural landscapes in accordance with DoDD 4700.1 and DoDI 4170.8. The criteria for current and approved will be in accordance with the regulations of the military department concerned.

Last Period

Standard data element. Enter as YYMMDD.

Major Air Pollution Source (Deboard)

EPA categorizes major air pollution sources as either "Class Al" or "Class A2."

Class Al: Sources with actual or potential controlled emissions, while operating at design capacity, equal to or greater than 100 tons per year of any federally regulated air pollutant (except lead, 5 tons per year).

Contraction of Carlos and Marcon and

When a starter

T 20 VERNMENT EXPENSI

• Class A2: Sources with controlled emissions less 100 tons per year but with potential uncontrolled emissions, while operating at design capacity, equal to or greater than 100 tons per year of any federally regulated air pollutant (except lead, 5 tons per year).

A list of major air pollution sources has been provided to the components by EPA Headquarters.

Major Permitted Discharges (Cable Q)

The Street water -

An installation with one or more "major" NPDES permitted discharges.

Major NPDES Permitted Discharge (DEDECO)

A NPDES permit which is classified by EPA as a "major." Any discharge out of compliance causes the permit to be out of compliance. A list of major NPDES permits has been provided to the components by EPA Beadquarters.

and the state of a to the sector



Major Oil Spill (

A reportable oil spill which is either:

o over 100,000 gallons in coastal waters, or

18 C. HATGUTTIETAN

• over 10,000 gallons in inland waters

Medium Oil Spill (@ 2003)

A reportable oil spill which is either:

• between 10,000 gallons and 100,000 gallons in coastal waters, or

行当场代的合大体。

e etasterne.

CARTERNALLS ST

3.85 มีการคระบบริการที่ 1.556 ค.ศ. 3

VERNMENT EXPEN

Is repair period bud set diality of

• between 1,000 gallons and 10,000 gallons in inland waters

Minor Air Pollution Source (STROP)

EPA category "B." Any air pollution source with potential uncontrolled emissions less than 100 tons per year for <u>any</u> of the criteria pollutants (except lead, 5 tons per year).

Minor Permitted Discharges (Septer2)

An installation with one or more NPDES permitted discharges, none of which is classified as major.

Minor NPDES Permitted Discharge (Fabreco)

An NPDES permit which is classified by EPA as a "minor." Any discharge out of compliance causes the permit to be out of compliance.

Minor Oil Spill (Cropects)

A reportable oil spill which is either:

• under 1,000 gallons in inland waters

Mixed (DEDED)

Physical mixing in storage NOT co-firing or duel-firing.

MOA (25550 10)

A signed document which describes what the installation will do to meet its obligations under the National Historic Preservation Act and related laws.

National Register of Historic Places (Depres)

ALL LANGER ST.

The listing of districts, sites, buildings, structures, and objects of national, state, or local significance in American history, architecture, archeology, and culture.



Net Revenue (Cobbect)

Gross revenue minus costs (may be negative)

NPDES Permitted Discharge (

"A discharge included under a National Pollutant Discharge Elimination System (NPDES) permit or equivalent document issued by the Administrator of EPA or, where appropriate, by a state agency, after the enactment of the Federal Water Pollution Control Act Amendments of 1972. Where several discharges are included in the same permit, each discharge will be counted as a separate "NPDES Permitted Discharge"."

Notice of Violation (NOV) (ACCORDED)

An official written notice by EPA or an authorized State or local environmental regulatory agency of a violation of law or regulation.

Notification (Telecop)

A public notification made pursuant to the Safe Drinking Water Act.

NPL (TELES)

the fillen as

at- Attach ?

National Priorities List of Superfund sites, issued by EPA pursuant to the National Contingency Plan and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

selection and with the state and selected of the last of

On-site Natural Resources Manager (SPDESD)

Having a technically trained individual responsible for and actively involved in managing the natural resources program. On-site means that the individual is on the staff of the organization responsible for the day-to-day operations and maintenance of the installation.

Other Outdoor Recreation Programs (Carles D)

Having, on federal lands controlled by the installation, a program to manage the recreational use of the natural environment for purposes other than hunting and fishing. Recreation facilities normally associated with urban areas, such as golf courses, athletic fields, tennis courts, and playgrounds, are not within this definition of outdoor recreation. Trail, birdwatching, picnic, beach, camping, and off-road vehicle areas are to be included.

The second reaction of the second second second second Out of Compliance (COMPLE)

المراجع الجلالحين والمرجع والمردي المراجعين والمرجع والمتحاف والمحافظ والمحاف المحافي والمراجع This is to be a self-assessment by the DoD component, and is independent of official NOV's. A condition in which a source is failing to comply with an applicable regulatory requirement which could be expected to result in an NOV if inspected by the appropriate regulatory agency.

a Soler and Calusters

L GOVERNMENT EXPENSE

Brondered Deland in La state & failure to the state of the state of an dan ing kawala da bilang di bilang di bilang dan bilang di bilang di barang da bilang dan bilang da bilang d



Outdoor Recreation Cooperative Agreement (Destand)

Having a current cooperative agreement for managing outdoor recreation resources or activities in accordance with the Memorandum of Understanding between DoD and Department of the Interior, April 7, 1978.

Outdoor Recreation, Hunting and Fishing (Company)

Hunting/Fishing Fees Collected - Fees collected, pursuant to 16 USC 670 a-f from individuals participating in hunting, fishing, trapping or other wildlife harvest activities on a military installation.

Other Outdoor Recreation Fees Collected - Fees collected for use of other outdoor recreation facilities which are an integral part of and dependent upon the natural resource environment. Do not include fees solely for the use of equipment (e.g., skis, tents, boats, etc.) or a man-made facility (e.g., cabins, boat launch, pavillion, etc.).

Wildlife Program Expenses - Expenses for the administration and improvement of fish and wildlife management activities (including law enforcement and education programs) which are funded from receipts collected via hunting/ fishing/outdoor recreation fees and those which are funded from other sources(e.g., O&M).

Outdoor Recreation Plan/segment (

Baving a current and approved plan for managing the installation's natural resources for outdoor recreation activities. The criteria for current and approved will be in accordance with the regulations of the military department concerned.

Overview (TERED D)

Basic study or report that summarizes existing information about an installation's historic and archeological proerties. It also indicates the likelihood of historic properties.

Permitted (Depression)

A source for which a required permit to operate has been obtained from the appropriate regulatory agency.

Pests ()

Arthropods, birds, rodents, nematodes, fungi, bacteria, viruses, algae, snails, marine borers, snakes, weeds, and other organisms (except for human or animal disease-causing organisms) that adversely affect the well-being of man and animals; attack real property, supplies, equipment, or vegetation; or are otherwise undesirable. L GOVERNMENT EXPENS

Pest Control QAE (Dible Db)

Quality assurance evaluators (inspectors) who are trained in accordance with DoD 4150.7-R and act as the contracting officer's technical representative



to protect the government's interest through performance evaluation of commercial pest control contract.

Pesticide (Table)

Any substance or mixture of substances, including biological control agents, that may prevent, destroy, repel, or mitigate pests, or control their development.

Pest Management Consultant (Constant)

Professional pest management personnel who provide technical and management guidance for the conduct of pest control operations. These government employees are located at DoD Component headquarters, major commands, engineering field divisions, or area support activities.

Pest Management Plans (

Installations' plans written in accordance with DoD 4150.7 to prevent and control pests which may adversely affect health, morale, or property.

Plan Integrated/Coordinated (IBSTeal)

There is documented evidence, that the historic preservation plan has been integrated or coordinated with other appropriate installation planning efforts (e.g., master plan, comprehensive plan, new construction requests).

Potential to Increase (2000)

Installation with natural resources suitable for but not currently being utilized as extensively as possible for a prescribed purpose (i.e., agricultural outleasing, hunting, commercial forestry, etc.).

Professional Staff (SEDE)

Military officers or DoD civilians with undergraduate or graduate degrees in biological, agricultural, or physical sciences who are assigned responsibility for natural resources management programs, perform that assignment on a regular basis, and are employed as of 30 September.

<u>On-site</u> - The professional is on the staff of the organization responsible for the day-to-day operations of an installation.

<u>Oversight</u> - The professional is on the staff of the organization responsible for overseeing, advising, or commanding management and operations at a group of installations.

an do dan se sa la la selada

and a start of the second starts

AL GOVERNMENT EXPENSE

Public Access (Cartons)

An installation providing access for hunting, fishing, or other outdoor recreation to all individuals regardless of whether they are employed by the Department of Defense.



Qualifying Recycling Programs (States)

Programs designated by a DoD Component to use the proceeds from sales of recyclable materials to finance projects as described in 10 USC 2577. The programs must consist of organized operations exhibiting concerted efforts to divert or recover wastes, as well as identification, segregation, and maintenance of the integrity of recyclable materials to enhance their marketability.

Rehab (rehabilitation) (2005)

Efforts and resources to maintain, repair, reproduce, revitalize, or protect the significant characteristics that cause a property to qualify for listing in the National Register.

Tall internet internet in a service of the service

Cidd", Cont. tabletter 4 cm

A STATE AND A STAT

T SOVERNMENT EXPENSE

Regulations (Cablerts)

the Bat Station

Laws and regulations promulgated under subtitle I of the hazardous and solid waste amendment of 1984 to the resource conservation and recovery act; include Federal requirements and state and local requirements. For 1985 only report data on compliance with State and local laws and regulations in effect on September 30, 1985.

Reported Pesticide Problem (Contract)

A difficulty or incident with a pesticide which has been officially reported and which requires corrective action. The problem generally represents a violation of applicable law or compliance agreement.

and a subscription of the second states and the second second second second second second second second second s

CHET AN MARTIN

interaction and an and the second states and the second second second second second second second second second

Re-refining (Carters)

Processing to remove impurities so that a product is again suitable for its original purpose.

Response (Taintan)

As defined in Section 101 (25) of CERCLA.

Reviewed (Debieron)

During this report period, all aspects of natural resources management (i.e., forest, wildlife, outdoor recreation, land, etc.) at an installation were examined for policy compliance, technical accuracy, and compatibility within the program and with the mission (see Integrated Natural Resources Program).

SHPO (State Historic Preservation Officer) (TENTON)

The official authorized to administer the National Historic Preservation Act within a State or Territory.

Sites (Stores)

As defined in the Installation Phase I Report.



Solvent Rental (States)

Supplier owns the solvent and charges Installation for solvent service.

SPCC (CORTO)

Oil and/or hazardous substance spill prevention, control, and countermeasures. SPCC plans are considered complete and current if they have been prepared and certified by a professional engineer on the required schedule. Projects required pursuant to SPCC plans are to be reported separately from the plans themselves.

GOVERNMENT EXPENSE

Standards (())

Primary drinking water standards or other regulatory standards.

Storage (Table D)

In storage as of reporting date awaiting disposal.

Total Installation Acreage (Debisio)

Number of acres for which DoD has national resources management responsibility.

Treatment (Ester)

As defined by the applicable regulations (treatment includes OB/OD ordnance which is classified as thermal treatment).

Note: For the purpose of Table 16 treatment is maintenance, repair, alteration, use protection recordation and data recovery of historic and archeological property for the purpose of compliance with historic preservation requirements.

Used Oil (TEDIECS)

Oil with characteristics that have changed since being manufactured but that may be suitable for further use. The term includes contaminated fuels and lubricating oils (crankcase oil, cutting oil, gear lubricant, metal working lubricant, hydraulic oil, transmission fluid).

Used Oil Fuel (BEDDE CB)

Any non-virgin fuel containing a used oil item including solvents or any waste materials such as paints or thinners or any unused fuels mixed with any of theses items.

Used Oil Items (2000)

Includes synthetic and mineral; motor oils, turbine oils, gear oils, hydraulic fluids, brake fluids and transmision fluids and antifreeze/coolant but excludes solvents, unused contaminated fuels, oils waste primarily water, and sludges.



User Fees From All (Destation)

An installation charging user fees to all participants for hunting, fishing or other outdoor recreation activities.

User Fees From Public Only (

Only non-DoD employees are charged fees for hunting, fishing, or other outdoor recreation. 9442 7.67 . anton

Virgin Fuel (Table 8) als and

1 A. A. A.

and a string in

and the second

6 20

and the

Additional part of the second

en fourtagearterna er vir big fit istigelitet in bonn

and a state days

the second s

Unless otherwise specified, purchased fuels may be considered virgin.

us sinistica converse in a solite factor in and the same according to a subscription of สาวใน 25. ตระสะโชวกับสาขึ้งสมัยวิญาษัสต่างการการการกลุ่มชาติไว้ไประการการการ

. R.-

and relation of the second of this and the second destruction of the statistic second s a letter and the state of the s

Carrier and and subsystems

Participa (Series)

Charles (States and States)

and the second second

A can de fa

a strain to atta shist. the second second second second

enter fillig

Wildlife Management Plan/Segment (

1921 1 T 1 T . M

addition to be and

110 - 110

Having a current and approved plan for managing the installation's fish and wildlife resources in accordance with DoDD 4700.1. The criteria for current and approved will be in accordance with the regulations of the military department concerned.

:30

OVERNMENT EXPENSE



6240 NREAD 26 Jun 87

FIRST ENDORSEMENT on DRMR-MEH 1tr dtd 16 Jun 87

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

Subj: 55-GALLON DRUM EXPANSION

1. Forwarded to all Marine Corps Base Hazardous Material Disposal Officers for information and action regarding storage of 55-gallon drums of hazardous materials and wastes.

JULIAN I. WOOTEN

Dist: MCES, HMDO RRDET, HMDO FMSS, HMDO MCSSS, HMDO RSU, HMDO ITS, HMDO SUPBN, HMDO HQBN, HMDO AC/S MWR, HMDO AC/S LOG, HMDO BMO, HMDO AC/S FAC



No onto bi addressi hav-ratio ao trapazaodian perint

Frank Differing antural geson passing and in Attained chie of dath, bash arts home of the bash of

MOLCHAE STRUFT ROMANDED IF dea

Ferrersi cubbusses ense equal entred lie of beirester. . 1 Disposal officers for information and action regarding storage of SS called Sture of barableus anticitals and vashes.

METOON N. LATERI, MARKE

14 1 M C. 在自己自任。

VS autoba

Disc., HNDO.

1

COMMI CAMPAGES

ALMER , EMOD

OGULL SHEDE COME JUN

station (2017) Guiden, succo

GOVE , MACH

00-02, 2008 2100 • (47) = 1,00 • (47) = 1,00 • (47)



DEFENSE LOGISTICS AGENCY DEFENSE REUTILIZATION AND MARKETING OFFICE-LEJEUNE LOUIS ROAD, BUILDING 906 CAMP LEJEUNE, NC 28542-5000

REFER TO DRMO-ZWM (M. Hipp/451-5652/11p)

16 June 1987

SUBJECT: Fifty-Five Gallon Drum Expansion

TO:

Commanding General, Marine Corps Base Commanding General, 2ND. Force Service Group Commanding General, 2ND Marine Division Commanding General, Marine Corps Air Station, New River Commanding Officer, Naval Hospital Commanding Officer, Naval Dental Clinic

1. Reference: DRMR-MEH letter, dated 10 Jun 87, subject as above (copy enclosed).

2. The referenced letter contains very important information on storage of fifty-five gallon drums of hazardous waste. The information contained in this letter and attachments may possibly prevent a similar occurrence here at Camp Lejeune.

3. Request this letter receive the widest dissemination possible to include all your Hazardous Material Officers and Hazardous Material Coordinators.

4. Thank you for your assistance in this matter.

1 Encl w/atts

cc: NREAD Safety Office Base Fire Department

Jadine Hipp

Nadine Hipp Chief, Defense Reutilization and Marketing Office



Inter-Office Memorandum

Dearge

DRMR-MEH (Ms. Luscavage/(AV) 683-6917/dam).

1 0 JUN 1987

SUBJECT: Fifty-five Gallon Drum Expansion

TO: Chiefs of DRMOs

REPLY

1. The enclosed information concerning 55-gallon drum expansion warrants the widest dissemination possible. With the summer months fast approaching, the potential for this type incident to occur within the Memphis Region is highly possible. Special attention should be given to proper storage/handling procedures to include the use of personal protective equipment. Frequent, thorough inspections are also a must.

2. This information must be discussed at your next safety meeting, or sooner. All personnel involved with dangerous property, whether directly or indirectly, must be briefed on this incident and the extra precautions for the upcoming summer months.

3. If you have any questions, please do not hesitate to call the Safety Office or your environmental monitor.

Rhonda Luscavage

Safety Specialist

1 Encl w/Att

cc: DRM**R-MO**H





DEFENSE LOGISTICS AGENCY DEFENSE REUTILIZATION AND MARKETING SERVICE FEDERAL CENTER 74 N. WASHINGTON BATTLE CREEK, MI 49017-3092

REPLY

DRMS-DW (T. McKeirnan/(AV)932-7036)

30 Apr 87

xcl.1

SUBJECT: Fifty Five Gallon Drum Expansion - DRMO McClellan

TO:

DRMR Memphis ATTN: Safety and Health Manager

1. Reference: DRMR-OD letter dated 7 Apr 87, subject as above.

2. The above reference is forwarded for your information and dissemination to the field offices. It illustrates the importance of host, DRMO, contractor alertness and cooperation when handling dangerous property. The contractor's alertness may have prevented a serious transportation incident.

3. We have since learned that methylene chloride (a halogenated hydrocarbon) and toxic formic acid was in many of the bowed drums. The DRMO's adherence to proper procedures and evacuation of DRMO employees prevented their exposure to toxic gases.

4. The spill team was correct in assuming hot weather contributed to the gassing process. The reaction, in the case, would have occurred more slowly without heat. In general, whenever possible, drums of HM/HW (either liquid or solid) should be protected from direct sunlight, particularly in warm weather. There are obvious exceptions, i.e., asbestos, latex paint, etc.

5. This would also be a good time to review paragraph V 6 on drum storage in DRMS-H 6055.1, Mishap Prevention Handbook.

ROBERT J. MRVA

Safety and Occupational Health Manager

Encl.

CC: DRMR-OEH





DEFENSE LOGISTICS AGENCY DEFENSE REUTILIZATION AND MARKETING SERVICE DEFENSE REUTILIZATION AND MARKETING REGION-OGDEN OGDEN, UTAH 84407-5001

2 April 1987

att 1 to Euch 1

IN REPLY REPER TO DRMR-OEH

MEMO FOR RECORD

On Thursday (26 March 1987) while preparing to load eighteen 55 gallon drums of solid waste, the contractor observed that the tops of six drums were bowed. He opened one of the drums to determine its content and observed a bubbling liquid.

The DRMO Chief was contacted and she immediately implemented spill procedures and withdrew DRMO personnel, except Mr. Jim Wishart who is an augmentee on the spill team. The spill team concluded that heat during the day caused the chemical reaction to form gas in the drum. The DRMO Chief insisted that the material be returned to the generator.

On Friday, the spill team supervised removel of the drums. A forklift operator placed the times approximately one to two inches above the domed lid. A canvas cover was placed over the top of the drum lids and workers were in full personal protective equipment with self contained air. The worker slowly opened the drum container rings. After determining the drums were not pressurized, they were returned to the originator's maintenance wash rack.

On Monday, March 30th, a survey of 114 drums on the DRMO site showed some signs of domed lids. Again the spill team, implementing the same procedures as above, removed 66 drums to the ALC maintenance area. Six of these were under slight pressure when opened.

By 1030 am Pacific time Wednesday, all spill activities had been completed and operations had returned to normal.

Air samples taken and analyzed by chemical lab personnel indicates the gas in the drums to be carbon dioxide believed to be formed by the neutralizing agent sodium carbonate which is added to contents prior to sending to DRMO.

Chemical lab personnel believe the reaction occurred between the absorbent and contents. An analysis of absorbent determined it was not kitty litter or safe step, however, it was a national stock listed item, to be analyzed further.

Maintenance personnel (MAQ-McClellan) will determine how many additional drums have left their facility and present location.

Safety office - McClellan will submit a High Accident Potential (HAP) message.

Bio Environmental will send us (DRMR) a report of spill team actions.

Chemical lab (MAQV) will complete analysis to determine contents and why the gas was formed. Report will be forwarded to DRMO who will in turn forward to DRMR-0.



DRMR-OEH PAGE 2 MEMO FOR RECORD

There was no adverse publicity on or off base. Everyone was very cooperative and there were no problems throughout spill team operations.

The Bio Environmental admantly advised our DRMO Chief to withdraw her personnel and followed all published instructions concerning hazardous spills.

There were no ISA problems.

Personnel contacted at McClellan:

Safety Office - Karen Sitzman	AV 63	3-6227
Bio Environmental - Zane Martin	AV 63	3-3672
Chem Lab - Oscar Estella	AV 63	3-1090

EDWARD D. SAWAYA Acting Safety Officer



25 Jun 87

Alle Falls worth



6240 NREAD

Supervisory Ecologist, Soil, Water and Environmental Branch, Natural Resources and Environmental Affairs Division, MCB, CLNC All Soil, Water and Environmental Branch personnel, Natural Resources and Environmental Affairs Division, MCB, Camp Lejeune

TECHNICAL ASSISTANCE WITH THE COMPLETION AND REVIEW OF WASTE IDENTIFICATION DOCUMENTS (WIDS)

Ref: (a) BO 6240.5A

1. The subject WID's are a critical part of the revised Hazardous Waste Management Program published by the reference.

2. Responsibility within the Soil, Water, and Environmental Branch, for providing support to Hazardous Material Disposal Coordinators (HMDC's) required to ensure that WID's are properly completed and technically correct, is hereby assigned to the Environmental Chemistry and Microbiology Section. The Supervisory Chemist and Environmental Control Specialist, GS-9, shall cooperate in processing WID's.

3. It is anticipated that a significant amount of field observations of waste streams will be required. All work will be done in close cooperation with cognizant HMDC's, Base Safety, Preventive Medicine, Base Fire Department, etc.

4. High priority shall be given to this activity over the next few months. Once initial workload is processed, this should not be a major time consumer.

D. D. SHARPE

Copy to: Dir, NREAD

agunt cz

Coby to:

() 美野市 (4

Sopervisory scologist; Soll, Eater and Envargemental Brahon, S. Stutal Schources and Environmental Atlante Divigion, MCS, CLUC All Soll, which and Environmental articl possessed , withral Resources and Environmental Articlic Division, MCF. Capo Lejeuce

TECHNICAL ASSISTANCE WITH THE COMPLETION AND REVIEW OF MESTE . IDENTIFICATION DOCUMENTS (NICKS)

(a)"PO B2#B:SA

... The subject WID's are a critical part of the revised hazargous waste Management Program published by the reference.

2. Responsibility within the Soil, Sater, and Environmental Branch, for providing superi to hazardousematerial Dicoosal Coordinators (GMDC's) requires to ansure that WID's avergroperly accordence and trainically correct; is hereby assigned to the remember Chemistry and Microbiolov Sociem. The Supervisory Coentate and Arvicemental Control Speciatist, 65-9, shall

3. It is auntificated that a significant amount of finid observations of waste streams will be recuired. All work will be done in close comperation with cognizant HADC's, tass fafety, Prevontive Medicine, Base Fire Separtment, etc.

4. digh prioriry shall be given to this activity over the next for months. Once initial workbad is processed, this crould act be a solor time consumer.

DE D. SHARPES

6240 NREAD 26 Jun 87

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

Subj: HAZARDOUS WASTE STORAGE CONTAINERS

Ref: (a) Discussion btwn Hazardous Material Disposal Coordinator, and personnel from Shop Stores on 16 Jun 87

1. In response to the reference, an inspection/inventory was taken of the subject containers stored at Lot 201. After checking the containers, it was discovered that rust had accumulated on the metal drums from being exposed to the weather.

2. It is recommended that all containers be protected from the weather.

J. I. WOOTEN

Copy to: Don Finney, OIC, DSSC All and a second s

Provinsion: Returblischungerian invironistic rindrau Provinsion: Andrine Gauga Based, Complete The resistant Character Societure Adriation Complete Marine Complete Advised Control of Societure Complete Advised Control of Societure Societure

Paul (a) Debación e va freendo D'hairfill Bluch al Bluch (a) - and repaired true nos store units Sun JF

is is respected to the risk her actual of tool taken by here
terearts to the risk here is the rest of the risk tool 201. The rest is the risk to the risk to

// The course of the first is contained as a process of the months.

street fill be

 25 Jun 87

6240 NREAD

Supervisory Ecologist, Soil, Water and Environmental Branch, Natural Resources and Environmental Affairs Division, MCB, CLNC All Soil, Water and Environmental Branch personnel, Natural Resources and Environmental Affairs Division, MCB, Camp Lejeune

TECHNICAL ASSISTANCE WITH THE COMPLETION AND REVIEW OF WASTE IDENTIFICATION DOCUMENTS (WID's)

Ref: (a) BO 6240.5A

1. The subject WID's are a critical part of the revised Hazardous Waste Management Program published by the reference.

2. Responsibility within the Soil, Water, and Environmental Branch, for providing support to Hazardous Material Disposal Coordinators (HMDC's) required to ensure that WID's are properly completed and technically correct, is hereby assigned to the Environmental Chemistry and Microbiology Section. The Supervisory Chemist and Environmental Control Specialist, GS-9, shall cooperate in processing WID's.

3. It is anticipated that a significant amount of field observations of waste streams will be required. All work will be done in close cooperation with cognizant HMDC's, Base Safety, Preventive Medicine, Base Fire Department, etc.

4. High priority shall be given to this activity over the next few months. Once initial workload is processed, this should not be a major time consumer.

D. D. SHARPE

Copy to: Dir, NREAD

A south & a south

Level - 101 Made

akto.

and a sector and the drag store part or start Le ingleter of the sector of the sector

A sep official a tail the construction and the construction of at acts to receized at a tail the construction with a construction of the construction of the construction official construction of the first solution of the construction of the construction of the first solution of the construction of the construction of the first solution of the construction of the construction of the first solution of the construction of the construction of the construction of the first solution of the construction of the construction of the construction of the first solution of the construction of the construction of the construction of the construction of the first solution of the construction of the construc

3. It's Stillersteadt is Statistical car no signification of the boundary of the sectors of the sectors of the sector of the

/ Price priority shall be side to be the section we be the mext dew momthel three plat at working, if programmed, the sheple sec be a monor firm working.

star san high si

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

5

24 June 87 Date

Director From: Subj: LANT DIV Lab Support / Finder / Monton Mn Elton called today concompany attached attached attached attached attached negwith we call HANDOW, and advine Funds are going to be sent. Durlop system for kniping up with what goes to FANTDIV and what we get back. 3 Draft the to Timan Commandi adving them starting FY-88 they will have to find heyardow worte - testing.

Julio


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

> 6240 FAC JUN 2 4 1987

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

To: Assistant Chief of Staff, Comptroller, Marine Corps Base, Camp Lejeune

Subj: NON-ROUTINE LAB CONTRACT (JTC), FY87

Encl: (1) LANTNAVFACENGCOM LTR 6280 1141SM of 14 May 87

1. The enclosure is forwarded requesting funding. It appears that our laboratory testing requirement will approximate \$64,000 this FY vice the \$42,000 estimated by LANTDIV.

2. Because of the expanded use of this service, we intend to develop formal procedures with LANTDIV for management/control of same. In this regard, please advise this office when funding is available in order that management procedures can be developed accordingly.

3. Additionally, a substantial amount of this laboratory work is in direct support of FMF units. The most common use is analysis of suspected hazardous waste in preparation for shipment to DRMO for subsequent disposal. These analyses are expensive and could often be avoided if proper segregation procedures were followed by the using unit. Thus, it is anticipated that these costs will be passed on to the requesting unit beginning FY88. We are drafting correspondence to this effect at present.

4. Point of contact in this matter is Ms. Elizabeth Betz, NREAD, extension 5977.

B. W. ELSTON By direction

copy to: NREA

A PARTON COLLAR REPAIRS CORP. C. R. C.

Tone-Kapping and the distance of the

JUN 2 4 1987

Feph: Assistant un st of distail, facilities, Mailar Corps From Comp Liner; Tox Satificant this of Shall, was realized, Marine Torre Mar; Tox Comp Lefe Day

tary (1976), coursed and instanting (1976).

51 3600

The sector is done at an another sector is a produce. It are a point that much subtained for and rate sector and will apply that is a thread that a sector structed is a sector.

THE REPORT AND ADDRESS OF THE PARTY OF THE REPORT OF THE PARTY OF THE

Elstand Provide a state in the fit and interview of the state in the state of the state of

Water is contention that receipts on fillential references
Water is contention that the second second



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

TELEPHONE NO. (804) 445-2934 IN REPLY REFER TO: 6280 1141SM

14 MAY 1987

ENCLOSURE

From: Commander, Atlantic Division, Naval Facilities Engineering Command

Subj: NON-ROUTINE LAB CONTRACT (JTC), FY-87, N62470-86-C-8754

Ref: (a) LANTNAVFACENGCOM 1tr 6280 1141SM of 13 Mar 87 (NOTAL)

Encl: (1). FY-87 Annual Funding Requirement From Activities In Non-Routine (JTC) Laboratory Contract

1. Reference (a) requested partial funding for FY-87 Non-Routine Laboratory Contract (JTC, Inc) to initiate the contract. The total annual funding requirement for your activity has also been estimated on your past usage of the contract. Enclosure (1) provides a list of funds received and the additional required funds for FY-87.

2. Please submit an appropriate funding document NC 2276 to Code 1141, LANTNAVFACENGCOM, preferably by 27 May 1987. Activities who have made partial payments need to amend/add to them. Any excess amount remaining will be returned at the end of the year.

Quality Performance ... Quality Results

3. Any questions should be directed to Mr. S. Mitro at (804) 445-2934 or AUTOVON 565-2934.

R. BATLEY

By direction

Distribution: PWC Norfolk NAVAIREWORKFAC Norfolk MARCORB Camp Lejeune. MCAS Cherry Point NAVSHIPYD Norfolk NAVSTA Roosevelt Roads NAS Oceana NAVPHIBASE Little Creek WPNSTA Yorktown NSC Norfolk NSC Yorktown NSC Craney Island NSC Cheatham Annex FCTCLANT Dam Neck

Fort Story U.S. Army Transportation Center ATZF - EHW, Bldg. 1407 Attn: Dave Shiplett Fort Eustis, VA 23604-5332



FY-87 ANNUAL FUNDING REQUIREMENT FROM ACTIVITIES IN NON-ROUTINE (JTC) LABORATORY CONTRACT

Activity		Funds Already Received in FY-87	Estimated Requirement For FY-87	Additional Funds Required	
1.	PWC Norfolk	\$64,754.66	\$ 88,000	\$23,245.34	
2.	NAVAIREWORKFAC Norfolk		\$ 94,000	\$94,000.00	
3.	MARCORB Camp Lejeune		\$ 42,000	\$42,000.00	
4.	MCAS Cherry Point	\$ 800.00	\$ 42,000	\$41,200.00	
5.	NAVSHIPYD Norfolk		\$ 53,000	\$53,000.00	
6.	NAVSTA Roosevelt Roads	\$ 2,923.00	\$ 3,200	\$. 277.00	
7.	NAS Oceana	\$ 2,675.00	\$ 3,000	\$ 325.00	
8.	NAVPHIBASE Little Creek	\$ 9,665.01	\$ 22,000	\$12,334.99	
9.	WPNSTA Yorktown	\$ 3,025.00	\$ 3,300	\$ 275.00	
10.	NSC Norfolk Yorktown Craney Island		\$ 5,400 \$ 350 \$ 1,600	\$ 5,400.00 \$ 350.00 \$ 1,600.00	
11.	NSC Cheatham Annex		\$ 1,400	\$ 1,400.00	
12.	Fort Story		\$ 750	\$ 750.00	
13.	FCTCLANT Dam Neck		\$ 8,900	\$ 8,900.00	

\$358,900



I. HAUE SAMPLE 9 other TANKS. Approximately TANKS Availabe for Storage.

> 6240/2 NREAD 4 Jun 87

3

- From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune To: Base Maintenance Officer, Marine Corps Base, Camp Lejeune
- Subj: WASTE OIL STORAGE TANK AT BUILDING 45; ANALYSIS OF
- Ref: (a) Dir M & R memo 6240 MAIN dtd 9 Jan 87 (b) BO 6240.5A
- Encl: (1) JTC Environmental Consultants, Inc., Report #559 (2) JTC Environmental Consultants, Inc., Report #559 addendum Table #1

1. As requested in reference (a), four samples were taken by NREAD of the large waste oil storage tank located next to Building 45. The samples were numbered 87-31 through 87-34. Sample #87-31 was taken from the bottom layers of oil in the tank. Sample #87-34 was taken just below the surface of the oil in the tank. Samples #87-32 and #87-33 were taken from middle layers of oil in the tank.

2. Based on data contained in enclosures (1) and (2), the Contents of the tank are regulated as a hazardous waste fuel by regulations outlined in reference (b). The majority of the subject waste oil appears to be suitable for burning for recovery of energy based on information provided by Oldover Corporation, Aquadale, North Carolina. Oldover is currently highly regarded by the State Hazardous Waste regulatory establishment as a mechanism for disposal of this type of waste. Based on information provided by Mr. Paul Hubbell, CMC (Code LFL), DRMO's cost of disposal will be reimbursed by higher headquarters. Cost in excess of \$250,000 is likely.

3. It is recommended that the subject oil be turned in to DRMO for disposal, and that DRMO be requested to remove the entire contents of the subject tank. It is likely that the bottom layer will require separate disposition due to Chromium and water content.

4. The tank should also be evaluated/tested for suitability for storage of waste oil prior to reuse. Point of contact is Danny Sharpe, extension 5003.

> D. D. SHARPE Acting

Copy to: DRMO AC/S, FAC



3Jun 87

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

> 6240 NREAD

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

To: Assistant Chief of Staff, Comptroller, Marine Corps Base, Camp Lejeune

Subj: NON-ROUTINE LAB CONTRACT (JTC), FY-87, N62470-86-C-8754

Encl: (1) LANTNAVFACENGCOM 1tr 6280 1141SM of 14 May 87

1. The enclosure is forwarded for your action. For several years, LANTNAVFACENGCOM has provided significant support to this activity via the subject type contract without reimbursement. Apparently, with funding availability becoming more critical, reimbursement by activities is being sought. Approximately \$22,000 in actual support has been provided to date during FY87. It is anticipated that an additional \$42,000 in laboratory support will be required during FY87.

2. At present, no procedures are in effect which require this activity to notify LANTNAVFACENGCON when we ship samples to the contract laboratory. It is recommended that the appropriate fiscal representatives at LANTNAVFACENGCON be contacted, and more formal arrangements be made which ensure no controversies arise.

3. Point of contact in this matter is Ms. Elizabeth Betz, NREAD, extension 5977.

T. J. DALZELL





DEPARTMENT OF THE NAV

ATLANTIC DIVISION NAVAL FACILITIES ENGINEERING COMMAND NORFOLK, VIRGINIA 23511-6287 TELEPHONE NO. (804) 445-2934 IN REPLY REFER TO: 6280 1141SM

14 MAY 1987

From: Commander, Atlantic Division, Naval Facilities Engineering Command

Subj: NON-ROUTINE LAB CONTRACT (JTC), FY-87, N62470-86-C-8754

Ref: (a) LANTNAVFACENGCOM 1tr 6280 1141SM of 13 Mar 87 (NOTAL)

Encl: (1) FY-87 Annual Funding Requirement From Activities In Non-Routine (JTC) Laboratory Contract

1. Reference (a) requested partial funding for FY-87 Non-Routine Laboratory Contract (JTC, Inc) to initiate the contract. The total annual funding requirement for your activity has also been estimated on your past usage of the contract. Enclosure (1) provides a list of funds received and the additional required funds for FY-87.

2. Please submit an appropriate funding document NC 2276 to Code 1141, LANTNAVFACENGCOM, preferably by 27 May 1987. Activities who have made partial payments need to amend/add to them. Any excess amount remaining will be returned at the end of the year.

3. Any questions should be directed to Mr. S. Mitro at (804) 445-2934 or AUTOVON 565-2934.

. J. Barle R. By direction

Distribution: PWC Norfolk NAVAIREWORKFAC Norfolk MARCORB Camp Lejeune. MCAS Cherry Point NAVSHIPYD Norfolk NAVSTA Roosevelt Roads NAS Oceana NAVPHIBASE Little Creek WPNSTA Yorktown NSC Norfolk NSC Yorktown NSC Craney Island NSC Cheatham Annex FCTCLANT Dam Neck

Fort Story U.S. Army Transportation Center ATZF - EHW, Bldg. 1407 Attn: Dave Shiplett Fort Eustis, VA 23604-5332



FY-87 ANNUAL FUNDING REQUIREMENT FROM ACTIVITIES IN NON-ROUTINE (JTC) LABORATORY CONTRACT

Act	ivity	Funds Already Received in FY-87	Estimated Requirement For FY-87	Additional Funds Required
1.	PWC Norfolk	\$64,754.66	\$ 88,000	\$23,245.34
2.	NAVAIREWORKFAC Norfolk		\$ 94,000	\$94,000.00
3.	MARCORB Camp Lejeune		\$ 42,000	\$42,000.00
4.	MCAS Cherry Point	\$ 800.00	\$ 42,000	\$41,200.00
5.	NAVSHIPYD Norfolk		\$ 53,000	\$53,000.00
6.	NAVSTA Roosevelt Roads	\$ 2,923.00	\$ 3,200	\$ 277.00
7.	NAS Oceana	\$ 2,675.00	\$ 3,000	\$ 325.00
8.	NAVPHIBASE Little Creek	\$ 9,665.01	\$ 22,000	\$12,334.99
9.	WPNSTA Yorktown	\$ 3,025.00	\$ 3,300	\$ 275.00
10.	NSC Norfolk Yorktown Craney Island		\$ 5,400 \$ 350 \$ 1,600	\$ 5,400.00 \$ 350.00 \$ 1,600.00
11.	NSC Cheatham Annex		\$ 1,400	\$ 1,400.00
12.	Fort Story		\$ 750	\$ 750.00
13.	FCTCLANT Dam Neck		\$ 8,900	\$ 8,900.00

\$358,900



6240 NREAD 12 Jun 87

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

Subj: HAZARDOUS SUSBSTANCE INCIDENT RESPONSE MANAGEMENT COURSE

Encl: (1) NEESA Port Hueneme Ca 252221 Mar 87 (2) Special Requirements for Training Course

1. Enclosure (1) advised that personnel from Naval Energy and Environmental Support Activity, Port Hueneme, California, will be conducting a Hazardous Substance Incident Response Management Course at Camp Lejeune on 27-31 July 1987.

2. Natural Resources personnel will assist Civilian Personnel Training Department in preparing support requirements for items needed to conduct the course. It is requested that Building #TP 448 be made available for training exercises for the duration of the course as requested by enclosure (2).

3. If additional information is desired, please contact Mr. Sammy Gwynn, NREAD, at extensions 2083/1690.

J. I. WOOTEN

Copy to: CPO, (ATTN: John Moran) A DATE A DESCRIPTION OF A

ervision, and an intervision that and an even with the second sec

in the another the second protection and a strate in the second second second second second second second second

The Part of State of the State of the Parts of the State

intervent = Cannot entit intervent for the formula of a function of its efficiential development of the efficiency of the formula intervent for an intervent of the formula of the formula intervent of the formula of the formula of the formula intervent of the formula of the formula of the formula of the formula intervent of the formula of the formula of the formula of the formula intervent of the formula intervent of the formula of t

to the second to the second second to the second second to the second seco

JUUUUUUL າມກຸດກຸດດາດກຸດກຸດກຸດກຸດກຸດກຸດກຸດກຸດ U UNCLASSIFIED U

MINISTRATIVE MESSAGE

UTINE

2522217 MAR 87 ZYB

NEESA PORT HUENEME CA

CG MCR CAMP LEJEUNE NC

CLAS //N12410//

BJ: PROPOSED HSIRMC

CMC LTR 6280 LFL/6-162 DF 30 DEC 86

REF A. IDENTIFIED YOU AS HOST FOR 5 DAY HAZARDOUS SUBSTANCE CIDENT RESPONSE MANAGEMENT COURSE FOR MARINE CORPS PERSONNEL. QUEST APPROPRIATE COURSE DATES BETWEEN 12 JUN AND 30 SEP 87. EASE RESPOND BY IO APR 87.

CRS PURPOSE: DEVELOP AND IMPROVE ACTIVITY RESPONSE TO HS SPILLS, RES AND EXPLOSIONS. CRS AUDIENCE: MAPINE CORPS PERSONNEL SPONSIBLE FOR SAFE AND PROPER RESPONSE TO HS EMERGENCIES.

FURTHER INFORMATION WILL FOLLOW BY LETTER. NEESA POC IS . CHRIS CONNELLY AT A/V 360-3351.

NP(2) ... ACT FUR CG MCB CAMP EJEUNF(12) 12410/ 1/0381 BCDS(1) BCPU(1) BMWP(1)(BSDD1) CFDA(1) ECCC(4) DICB(1)

RTD:000-000/COPIES:0012

2522212 MAR 87 NEESA PORT HUE

1 LF 1 MATA0269 087/08:352

853211/087 1: AUI 800398

> ENCLOSURE (1)

11 UNCLASSIFIED U Charles and a state of the stat 1 11 1 11 1 11 11 11



107 LF 052 1691	Formerly NAVEXOFE MAY BE USED	indicated)		
M (Show telephone number in addition to addres	DATE			
IECT		SERIAL OR FILE NO.		
		REFERENCE		
Saming Gwynn				
MCB		ENCLOSURE		
NREA office				
Camp Le Jusie NC	28542			
		A state of the second s		
	ENDORSEMENT ON			
		A CONTRACTOR OF THE OWNER OF THE OWNER OF		
	LLOW-UP, OR REQUEST SUB			
		REPORTED TO THIS COMMAND:		
UNDER YOUR COGNIZANCE	OF SUBJECT ITEMS			
INFORMATION	SUBCONTRACT NO OF SUBJECT ITEM	and the second		
APPROVAL RECOMMENDED	APPROPRIATION SYMBOL, SUBHEAD, AND CHARGEABLE ACTIVITY	DETACHED FROM THIS COMMAND		
APPROVED DISAPPROVED	SHIPPING AT GOVERNMENT EXPENSE	OTHER		
COMMENT AND/OR CONCURRENCE	A CERTIFICATE, VICE BILL OF LADING			
LOANED, RETURN BY	COPIES OF CHANGE ORDERS. AMENDMENT OR MODIFICATION			
SIGN RECEIPT & RETURN	CHANGE NOTICE TO SUPPLIER	A STATE AND A STATE AND A STATE AND A		
REPLY TO THE ABOVE BY	STATUS OF MATERIAL ON PURCHASE DOCUMENT			
REFERENCE NOT RECEIVED	REMARKS (Continue on receive)	11		
SUBJECT DOCUMENT FORWARDED TO	These are the support	out Requirous f		
SUBJECT DOCUMENT RETURNED FOR:	for training course	J.		
SUBJECT DOCUMENT HAS BEEN REQUESTED, AND WILL BE FORWARDED WHEN RECEIVED	I will help you	with any that		
COPY OF THIS CORRESPONDENCE WITH YOUR REPLY	au defficult.			
ENCLOSURE NOT RECEIVED		1 1 L		
ENCLOSURE FORWARDED AS REQUESTED	Nooc	ducie		
ENCLOSURE RETURNED FOR CORRECTION AS INDICATED		Λ į.		
CORRECTED ENCLOSURE AS REQUESTED		CNW		
REMOVE FROM DISTRIBUTION LIST				
REDUCE DISTRIBUTION AMOUNT TO	SIGNATURE & TITLE			



Support Requirements*

For all Courses:

ESA 1. Prepare a course announcement and circulate it to your activities ten weeks before the course. 12. Ensure that there are enough nominations to justify holding the class 75% of /class \size). 3. Coordinate screening of mominations with NEESA ÷¥-

4. Reserve a classroom for specified class size.

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

- 0 Slide projector and screen
- 0 16mm movie projector
- Overhead projector 0
- 3/4" VHS video machine and television monitor (video recorder required 0 for HSIRMCs) the a constraint and

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

1-1 7. Arrange for and epordinate with guest speakers to provide site specific information to the HWNS and HWFOC. The list of required guest speakers will PINC be provided at a later date.

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

9. Provide for secretarial and logistic support to include:

Minimelto 0

×

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

Enclosure (2)



Special requirements Fr HSIRMC:

- 1. 16 empty, closed-top, 55 gallon drums (with bungs).
- 2. 4 five-gallon pails.
- 3. One-hand truck.
- 4. 26 cardboard boxes (approximate volume, 1.5 cu. ft. each).
- 5. Two fire extinguishers available.
- 6. Bus to transport students to and from exercise area (if necessary).
- 7. Flat bed truck for transportation spill exercise.
- * 8. Enclosed area for a warehouse exercise with door to outside (located near classroom).
- ✤ 9. Field area for a spill exercise (located near classroom).
- ✤ 10. 600-1000 square foot area adjacent to classroom to be used for a suiting-up exercise.
- Il. Secure storage area (indoors) located near classroom and exercise areas for protective equipment (SCBAs, environmental suits, air monitoring instruments, etc.).

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

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



6240/2 NREAD 11 Jun 87

- From: Commanding General, Marine Corps Base, Camp Lejeune To: Commanding General, 2d Force Service Support Group, Camp Lejeune, (Attn: Hazardous Material Disposal Coordinator, G-4)
- Subj: ANALYSIS OF TEN BARRELS OF OIL AT BUILDING FC-120 BELONGING TO 2d LSB (Landing Support Battalion)

Ref: (a) BO 6240.5A

Encl: (1) JTC Environmental Consultants, Inc., Report #559 (2) JTC Environmental Consultants, Inc., Report #559 Addendum

1. On 17 February 1987, Natural Resources and Environmental Affairs Division personnel sampled the 10 yellow drums presently stored on pallets behind 2nd Landing Support Battalion's facility at Building FC-120, to determine if the contents could be treated as used oil. The material in the drums came from the underground waste oil tank at Building FC-120. The sample number is 87-30.

2. Enclosures (1) and (2) provide data from the analysis of sample #87-30. The data indicates that the contents of the subject barrels are specification fuel oil. The consistency of the oil precludes pumping into waste oil collection truck.

3. It is recommended that the subject barrels and contents be turned in to DRMO as a hazardous material per the reference. The material is not a regulated hazardous waste.

4. The point of contact on this matter is Elizabeth Betz, Supervisory Chemist, NREAD, at extension 5977.

> J. I. WOOTEN By direction

Copy to: DRMO

BCC: Chemist (2) Writer/Typist Both / Creander Date Typed (1) June 87 Word Processor Number 6240/20

气气的活动。 鼻前侧的

interfact in the second s

> > Dece entransis States Noc

> > > 100

141 . 1. V. Frade

Partial Report CASE # 559 LABORATORY ANALYSIS ON NAVAL SAMPLES (A/E CONTRACT N62470-84-B-6932) ° JTC REPORT # 87-126

PREPARED FOR: DEPARTMENT OF THE NAVY ATLANTIC DIVISION NAVAL FACILITIES ENGINEERING COMMAND NORFOLK, VA 23511

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

APRIL 17, 1987

E. Rosecrance Laboratory Director



Location: <u>Camp Lejeune</u>	Date of Receipt: 3-18-87 Turnaround:	routine
Date: 4-17-87 Report No. 559	to Naval Facilities Engineering Command,	Norfolk, Virgini
JTC Data Report No. 87-126 Table_		USO

NAVY	JTC	JTC ANALYSIS PARAMETER						
SAMPLE ID	SAMPLE ID	Flashpoint	XOT	Corrosivity pH	PCB _ug/g			12 A. A. A.
87-30 oil layer	12-4514	55	0.07%	**	<5			
87-30 water layer	12-4514	+	572 mg/	7,32	+			
87-31	12-4515	57	0.25%					er Reference Rijster av 1
\$7-32	12-4516	50	0.25%					
87-33	12-4517	50	0,24%					
87-34	12-4518	57	0.17%					

** unable to do analysis due to oil matrix



JTC Environmental Consultants, Inc.

Location: <u>Camp Lejeune</u>	Date of Receipt: 3-18-87 Turnaround:	routine m
Date: 4-17-87 Report No. 559	to Naval Facilities Engineering Command,	Norfolk, Virginia
JTC Data Report No. 87-126 Table_	2	010 10

-

NAVY	JTC SAMPLE ID	C ANALYSIS PARAMETER							
SAMPLE ID		Water 70	Sediment 70	Sp. Gravity g/ml	Viscosity @70°F, cSE.	BTU per 16,	-39. pr		
87-31	12-4515	11.0	0.38	0.81	28.6	17,000			
87-32	12-4516	10,7	0.40	0,81	27.9	17,100			
87-33	12-4517	10.5	0.37	0.83	26.0	17,100			
87-34	12-4518	6,40	0.20.	0.76	21.0	18,000			
•									
•						J			

•



RÉPORT # 559 Addendum LABORATORY ANALYSIS ON NAVAL SAMPLES (A/E CONTRACT N62470-84-B-6932) JTC REPORT # 87-126

PREPARED FOR: DEPARTMENT OF THE NAVY ATLANTIC DIVISION NAVAL FACILITIES ENGINEERING COMMAND NORFOLK, VA 23511

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

APRIL 29, 1987

Real

Ann E. Rosecrance Daboratory Director



JTC Environmental Consultants, Inc.

		J	OTC Enviror	nmental Cor	nsultants,	Inc.			1	
location:	Camp Le	jeune		Date of Re	eceipt: <u>3</u>	-18-87	Turnaround	: routin	e .	
Date: 4-2	9-87 Repo	ort No. 5	59	_ to Naval	Facilitie	s Engineeri	ng Command	, Norfolk,	Virginia	
JTC Data Re	eport No. 8	17-126	_ Table_						crcci	
NAVY	JTC		ANALYSIS PARAMETER							
ID	SAMPLE ID	As ug/L	Ba ug/L	Cduq1L	Cr ug/L	Pb ug/L	Hg	Se un 11	Ag	
87-30 oil layer	12-4514	<2700	3530	<1500	710	19,500	<0.1	< 860	< 8920	
87-30 water layer	12-4514	<500	180	425	150	<250	~2,0 mg	<570	<50	
87-31	12-4515	42700	•	<1500	21,000	63,800				
87-32	12-4516	~2700		<1500	1850	62,100				
87-33	12-4517	<2700		<1500	1690	60,200	• 		<u></u>	
87-34	12-4518	<2700		<1500	1350	67,500				


JTC Environmental Consultants, Inc.

Location: Date: <u>4-2</u> JTC Data Re	Camp Leg 9-87 Repo port No. 8 JTC	eune ort No. <u>55</u> 1-126	7 Add Table_	Date of R to Naval	ANALYSIS	-18-87 s Engineeri PARAMETER	Turnaround	a: <u>rout</u> a, Norfolk,	virginingoriv
SAMPLE ID	SAMPLE ID	Cyanide	sulfide						<u>щ</u>
87-30 layer	12-4514	<0.5 mg/kg	NA						
87-30 water loyer	12-4514	~10 mg/L	850 ⁴⁹ /						
					•				
•			:4						
	ana a								

NA:= not available, result will be reported in separate addendum



11 June 1987

6240/2 NREAD

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

STEAM GENERATION'S WASTE OIL TANKS

Encl: (1) JTC Environmental Consultants, Inc., Report No. 539, Table 6 (2) Table of Waste Oil Tank/Drums Locations

1. On 7 January 1987, the waste oil tanks and drums at the various steam generation plants aboard Camp Lejeune were sampled by NREAD to determine if the oil could be treated as used oil.

2. Enclosure (1) shows the Total Organic Halogens (TOX) values for the waste oil tanks at the various steam plants. Enclosure (2) correlates the tank locations with the sample numbers used in enclosure (1). All but sample number 87-23 (Tank at Bldg M-625), had TOX values below 1000 ppm. Therefore, all but the aboveground tank at Bldg M-625 and the drum labeled 87-20 at Bldg 1700 should be treated as used oil. The oil in the aboveground tank at Bldg M-625 should be pumped into barrels and turned in to DRMO as a hazardous waste fuel oil. The analysis of sample #87-20 (Black drum at Bldg 1700) is incomplete at this time so disposal recommendations can not be provided at this time.

JULIAN I. WOOTEN

Copy to: DRMO

Blind copy to: EC&MC (2 copies)

Pact onto TE

Mane com cos

(secondo lina)

virtectory serving forcompete and sevironcental affairs theren a same portochas. Cash rejuin bace (critical) finite corres inter, but bace and s (Arther Urillicity Virtical)

MA TOM

b. Og V Januard 1987, Mey sarte Gil Times and sixture at the Ville state questions pleasts specify into Logenzo and extra at the Ville do categorie if the usi sould be treated as use oil of the categorie if the usi sould be treated as use oil of

solutions and a solution of the solution

A STREAM STATES

Partial Results REPORT # 539 LABORATORY ANALYSIS ON MAVAL SAMPLES (A/E CONTRACT N62470-84-B-6932) JTC REPORT # 87-132

PREPARED FOR: DEPARTMENT OF THE NAVY ATLANTIC DIVISION NAVAL FACILITIES ENGINEERING COMMAND NORFOLK, VA 23511

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

APRIL 22, 1987

ann E Roseciance

Ann E. Rosecrance Laboratory Director



Location: <u>Camp</u>	Lejeune	Date of Receipt: 2-26-87 Turnaround: routine
Date: 4-22-87	Case No. 539	_ to Naval Facilities Engineering Command, Norfolk, Virginia
JTC Data Report No	87-132 Table_	<u>la</u>

NAVI	JTC	La file di	
SAMPLE ID	SAMPLE ID	ТОХ ррт	Flashpoint
87-19	12-4454	100	25
87-21	12-4455	700	20
87-22	12-4456	200	55
87-23	12-4457	2100	25
87-24	12-4458	500	25
87-25	12-4459	400	20
9-26	12-4460	100	40
87-27	12-4461	100	not observed flame at 55°
87-28	12-4462	500	not observed Flame at 80°
87-19	17-4412	2100	25



TABLE OF WASTE OIL TANK/DRUMS @ STEAM GENERATION

SAMPLE NUMBER	LOCATION & DESCRIPTION
87-19	3 Yellow 55-gallon drums @ Bldg 1700 (Orginally from BOQ Waste Oil Tank)
87-20	1 Black 55-gallon drum @ Bldg 1700
87-21	Tank at Bldg 1700
87-22	Underground Tank at Bldg M-625
87-23	Above-ground Tank at Bldg M-625
87-24	Underground Tank at Camp Geiger
87-25	Above-ground Tank at Camp Geiger
87-26	Above-ground Tank at Air Station
87-27	Underground Tank at RR-15
87-28	Underground Tank at Courthouse Bay
87-29	Above-ground Tank at Courthouse Bay



File Haz Woste

FISCAL YEAR 1986 SAMPLES

10 June 67

HAZARDOUS WASTE :	\$ 16	@ ~ "600 EACH
WASTE OIL :	13	@~ \$600 EACH
VOCS OF WASTER :	~/10+	@ ~ # ZZO EACH
LANDFILL	4	e
FISCAL YEAR	1987 SAMI	PLES (SO FAR)
LANDFILL	4	
HAZARDOUS WASTE	34	And the second second
WASTE OIL	23 23	
YOCS OF WATER	15	



Twylat, File & Coff File & Coff water Hay Woste water Hay Woste

VIRONMENTAL AFFAIRS Base Carolina 28542

10 June 87 Date

From: Director To: Dan Subj: 4 c Wart an

٩

Hg Worth annual Fee

Su allached

Julia



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

10 June 87 Date

From: Director To:

Subj:

3

Subj: H& Worth annual Fre Sue alloched.

pilia





A The EAD

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

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

June 5, 1987

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

MEMORANDUM

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

FROM: R. J. Edwards, III, Administrative OfficerVC Solid and Hazardous Waste Management Branch Environmental Health Section

SUBJECT: Annual Fee Billing for Handlers of Hazardous Waste

Effective January 1, 1986, all handlers of hazardous waste were required by Administrative rule 10 NCAC 10C .0701 through .0704 to pay an annual fee.

The annual fee for FY 1988 will be due on July 1, 1987. Due to a proposal in the General Assembly at this time to amend the present fee schedule, we will not be able to bill you for this fee until that proposal is ratified and we know what the fee schedule is.

Upon receipt of the fee schedule, this Branch will invoice you for the annual fee and will send a copy of the schedule fee changes. Please do not send any payments of your annual fee until you have been invoiced.

RJE:bw



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

10 June 87 Date

DDS. Menere for

From: Director To: Da

Subj: H& Worth annual Fee

Su allached.

pilia

glene gla 15 June 87





A"/10 IREAD

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

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

June 5, 1987

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

MEMORANDUM

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

FROM: R. J. Edwards, III, Administrative Officer VC Solid and Hazardous Waste Management Branch Environmental Health Section

SUBJECT: Annual Fee Billing for Handlers of Hazardous Waste

Effective January 1, 1986, all handlers of hazardous waste were required by Administrative rule 10 NCAC 10C .0701 through .0704 to pay an annual fee.

The annual fee for FY 1988 will be due on July 1, 1987. Due to a proposal in the General Assembly at this time to amend the present fee schedule, we will not be able to bill you for this fee until that proposal is ratified and we know what the fee schedule is.

Upon receipt of the fee schedule, this Branch will invoice you for the annual fee and will send a copy of the schedule fee changes. Please do not send any payments of your annual fee until you have been invoiced.

RJE:bw



OPNAV 5216/144A (Rev. 8-81) 5/N 0107-LF-052-2320

DEPARTMENT OF THE NAVY

Memorandum

FTRE

DATE: 4 Jun 1987

FROM: Base Fire Chief, Marine Corps Base, Camp Lejeune

TO: Director, NREAD

SUBJ: HAZARDOUS WASTE

1. As directed by the Hazardous Waste Storage Contingency Plan, I have reviewed with representatives of the Naval Hospital and Provost Marshal, and furnished on a monthly basis a complete list of on-hand Hazardous Waste, and a floor plan showing its physical location in its respective building. I have also reviewed the contingency plan as directed.

Copy for Dany File Origina Hg Woste



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



DEPARTMENT OF THE NAVY

Memorandum 11320

FIRE

DATE: 4 Jun 1987

FROM: Base Fire Chief, Marine Corps Base, Camp Lejeune

TO: Director, NREAD

SUBJ: HAZARDOUS WASTE

1. As directed by the Hazardous Waste Storage Contingency Plan, I have reviewed with representatives of the Naval Hospital and Provost Marshal, and furnished on a monthly basis a complete list of on-hand Hazardous Waste, and a floor plan showing its physical location in its respective building. I have also reviewed the contingency plan as directed.

R. M. PINER, Jr.



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

4

FAC/DDS/JC 6280 24 APR 1984

MEMORANDUM

From: Assistant Chief of Staff, Facilities

To: Director, Fire Protection Division

Director, Natural Resources and Environmental Affairs Division

Subj: Notification of Reporting of Spills of Oil and other Hazardous Substances

Ref: (a) BO 11090.1B

1. The reference provides reporting procedures requiring all personnel aboard Marine Corps Base to immediately report all spills of oil or hazardous materials to the Base Fire Protection Division (FPD), extension 3333. Effective upon receipt of this memo, notification of all spill reports will be made as follows:

a. Immediate notification to Natural Resources and Environ- Dimension with mental Affairs Division (NREAD) will be made by FPD for all spills duif Priver on or likely to reach water and spills on land of 100 gallons or more regardless of time. Spills less than 100 gallons contained 4-18-85 on land will be reported by FPD to NREAD during working hours, FPD will math 1866 i.e., 0800 to 1630. Names and phone numbers of NREAD personnel dog. - work days to be contacted after working hours will be provided to FPD and spill curved with kept current by NREAD.

b. Immediate notification to Base Maintenance Division (BMD), attention: Maintenance and Repair (M&R) Director (extension 5855/ 5184), will be made by PPD for all spills occurring during normal working hours. All spills occurring after working hours will be reported by FPD to Emergency Maintenance, BMD extension 3001. BMD will have one supervisor on duty or call at all times to assist in emergency spill containment and cleanup. Names and phone numbers of M&R supervisor(s) to be contacted after working hours will be provided to FPD and kept current by BMD.

c. Notification to the office of the Assistant Chief of Staff, Facilities, will be made by FPD for all spills on water or spills of more than 100 gallons on land for which spill reports are received during working hours, i.e., Monday through Friday, 0800 to 1630.

d. Notification to the Command Staff Duty Officer (extension 2523/2528) by the FPD will be made for all spills reported outside the working hours mentioned above.



Subj: Notification of Reporting of Spills of Oil and other Hazardous Substances

e. For reported spills presenting potential threat to navigable waters, home, health or loss of property which occurs outside working hours mentioned above, FDP will notify the Assistant Chief of Staff, Facilities (455-5023), or Deputy to the Assistant Chief of Staff, Facilities (328-0958), or the Facilities Management Officer (353-7611) at home.

2. FPD will serve as on-scene coordinator, as defined in the reference, for containment of routine spills on land. NREAD will serve as on-scene coordinator for spills on streams or other bodies of water. Non-routine oil spills on land will be handled on a case by case basis, with the understanding that NREAD will report to scene of any spill if so requested by authorized FPD representative.

3. NREAD will monitor the implementation of procedures contained in this memorandum. These procedures should be incorporated by NREAD into the next revision of the reference. Any questions concerning reporting procedures should be directed to this office.

> B. W. EISTON By direction

Copy to: BMO PWO EnvEng



1-86 Edition)

where the in-Assistant Adste and Emerept comment for 60 days. ator for Solid Response also ting upon re-

t Administrad Emergency ision whether erator.

ed]

Treatment

atment.

this subpart ators of faciliat hazardous than enclosed flame combusrovides othert in enclosed flame combusquirements of an incinerator.

ved]

g requirements.

bus waste, the bring his thero steady state operation—inrating temperfuel or other is is a non-connal treatment is a complete discrete quan-

te analyses rewner or operaanalyze any not previously al process to n steady state opriate (for a

Environmental Protection Agency

Tile Hay Worth

non-continuous process) operating conditions (including waste and auxiliary fuel feed) and to determine the type of pollutants which might be emitted. At a minimum, the analysis must determine:

(a) Heating value of the waste;

(b) Halogen content and sulfur content in the waste; and

(c) Concentrations in the waste of lead and mercury, *unless* the owner or operator has written, documented data that show that the element is not present.

[Comment: As required by § 265.73, the owner or operator must place the results from each waste analysis, or the documented information, in the operating record of the facility.]

§ 265.376 [Reserved]

§ 265.377 Monitoring and inspections.

(a) The owner or operator must conduct, as a minimum, the following monitoring and inspections when thermally treating hazardous waste:

(1) Existing instruments which relate to temperature and emission control (if an emission control device is present) must be monitored at least every 15 minutes. Appropriate corrections to maintain steady state or other appropriate thermal treatment conditions must be made immediately either automatically or by the operator. Instruments which relate to temperature and emission control would normally include those measuring waste feed, auxiliary fuel feed, treatment process temperature, and relevant process flow and level controls.

(2) The stack plume (emissions), where present, must be observed visually at least hourly for normal appearance (color and opacity). The operator must immediately make any indicated operating corrections necessary to return any visible emissions to their normal appearance.

(3) The complete thermal treatment process and associated equipment (pumps, valves, conveyors, pipes, etc.) must be inspected at least daily for leaks, spills, and fugitive emissions, and all emergency shutdown controls and system alarms must be checked to assure proper operation.

§ 265.383

§§ 265.378-265.380 [Reserved]

§ 265.381 Closure.

At closure, the owner or operator must remove all hazardous waste and hazardous waste residues (including, but not limited to, ash) from the thermal treatment process or equipment.

[Comment: At closure, as throughout the operating period, unless the owner or operator can demonstrate, in accordance with $\S 261.3(c)$ or (d) of this chapter, that any solid waste removed from his thermal treatment process or equipment is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements of Parts 262, 263, and 265 of this chapter.]

§ 265.382 Open burning; waste explosives.

Open burning of hazardous waste is prohibited except for the open burning and detonation of waste explosives. Waste explosives include waste which has the potential to detonate and bulk military propellants which cannot safely be disposed of through other modes of treatment. Detonation is an explosion in which chemical transformation passes through the material faster than the speed of sound (0.33 kilometers/second at sea level). Owners or operators choosing to open burn or detonate waste explosives must do so in accordance with the following table and in a manner that does not threaten human health or the environment.

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others
0 to 100	204 meters (670 feet).
101 to 1,000	380 meters (1,250 feet).
1,001 to 10,000	530 meters (1,730 feet).
10,001 to 30,000	690 meters (2,260 feet).

§ 265.383 Interim status thermal treatment devices burning particular hazardous waste.

(a) Owners or operators of thermal treatment devices subject to this subpart may burn EPA Hazardous Wastes FO20, FO21, FO22, FO23, FO26, or FO27 if they receive a certification from the Assistant Administrator for Solid Waste and Emergency Response



TENTATIVE AGENDA FOR ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE INSPECTION

DATE	TIME	SCHEDULED ACTIVITY
March 1987	31, 0845	NREAD, Building 1103: Records review and scheduling of site visits
	0930	Second Marine Division: Generation Site visits
		A. LAV Battalion, Building 1750
		B. AmTrAC
		c. atk marines
	1200	Lunch at Riverview (Ride By Court- house Bay and Rifle Range)
	1330	Camp Geiger: Generation Site Visit
	1430	Camp Johnson: Generation Site Visit
	1530	DRMO, Building TP 451: TSDF Inspec- tion
April 1	1, 0815	NREAD, Building 1103: Assemble Team
1987	0830	Second Force Service Support Group:
		Generation Site Visits
		A. 2d Maintenance Battalion - (Re-inspection)
		в.
		с.
	1100	TMO, Building 1011: Transportation Inspection
	1300	Open:
	1500	Assistant Chief of Staff, Facilities, Building 1: Outbrief






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

Date: 9 Mar 1987

ACTION BRIEF:

Staff Section: Assistant Chief of Staff, Facilities

Subj: BO 6240.5, HAZARDOUS MATERIAL DISPOSAL PROGRAM; REVISION OF

- Ref: (a) Resource Conservation and Recovery Act (RCRA) (Pub No 94-580) (42USC 6901-6987)
 - (b) 40 Code of Federal Regulations 260-265
 - (c) EPA ltr 4WD-RM of 14 Aug 1986
 - (d) DHS ltr WLM/vh/G426A of 26 Feb 87

Problem:

Successful compliance with stringent hazardous waste (HW) management requirements of references (a) and (b) requires cooperation from all organizations within the Camp Lejeune/ Marine Corps Air Station New River Complex. The subject revision was undertaken to clarify procedures and responsibilities and to strengthen internal controls at all levels of command. The subject revision is needed to address ongoing, unresolved compliance problems.

Background/Discussion:

The subject revision was initiated prior to the Environmental Protection Agency (EPA) inspection documented in reference (c). Subsequent to the EPA inspection, particularly during negotiations with the North Carolina Division of Health Services (DHS), the need for the subject revision became an important issue. Reference (d) provided a compliance order issued to this command describing both violations and actions required for compliance and continued operation. The current Base Order is not adequate to address issues such as those contained in references (c) and (d).

Recommended Action:

It is recommended that the subject order be signed and published immediately.

Very respectfully,

B. W. ELSTON Assistant Chief of Staff, Facilities Acting



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

21 May 87 Date

From: Director To:

Chemical Spill at Blog 1700 Subj:

See attached

Juha

Glenere

Review and Comment

at your convenience

Sharpe

proto por Elever



2 1 MAY 1987

Deputy Base Maintenance Officer

Assistant Chief of Staff, Facilities

INVESTIGATION IF CHEMICAL SPILL AT BUILDING 1700 STEAM PLANT ON 1 APR 1987

Encl: (1) UtilGenFore memo 11370 MAIN of 15 May 87 w/out encls

1. Details of the investigation into the chemical spill that occurred at the Building 1700 Steam Plant on 1 April are provided in the attached enclosure.

C. G. POWELL

Copy to: FIRE

2 1 MAY 1987

303. 1400.

位的公司

Manal

Security personal attended of the or

in the attached antiparts.

ABTECHTORTEST DE CERTISAE SPILE AT GUILDING TOG GILAP LEAN OF LANS 1987 • (1) Utilicanegic game plane bail of 1: Nay 37 W/mut eggla 1. Wétenia egetue Beventgatte into the chantel apili that equired at the Building 1700 Grass Flagt of 1 Apil and provided

- JIENOY

5280

应注入标

CPNA \$5216/144A (Rev. 8-81) 5/N 9107-LF-052-2320



DATE: 15 May 87

FROM: Utilities General Foreman

TO: Director, Utilities Branch

SUBJ: INVESTIGATION OF CHEMICAL SPILL AT BUILDING 1700 STEAM PLANT OF 1 APR 87

- (1) Statements of Witnesses
- (2) Work Request No. 149-87
- (3) Dir UtilBr 1tr 11370 MAIN of 3 Apr 87
- (4) Safety Data Sheets for Chemicals in Bulk Tanks

1. The subject chemical spill was at the bulk chemical storage area which consists of two 5400 gallon polyethelene tanks, block retaining wall (berm), and off loading pumps. The tanks contain Amerplex 705 Deposit Inhibitor and Amercor 8750 Corrosion Inhibitor. These chemicals are used for the protection of boilers and steam and condensate lines. Statements of witnesses are provided in enclosure (1).

2. The large consumption rate, cheaper price per gallon, easier method of dispensing chemicals, and labor savings on disposing of used drums justified the use of bulk chemicals in lieu of purchasing chemical in 55 gallon drums as in the past. The existing chemical contract specifies that the supplier will furnish bulk tanks to store the procured chemicals. Presently, the chemicals and tanks are being purchased from Drew Chemical Company.

3. On 1 April 1987, Bob Baughn, contract superintendent for Mcgraw-Morgan Company, stated he smelled a strong ammonia odor outside their office trailer (trailer is located between the chemical tanks and the steam plant). Upon investigating, he saw chemical splashing out of one of the bulk chemical tanks. He then called the steam plant and informed them of the leaking tank. Mr. Ernest Humphrey, Leader Boiler Plant Operator on shift responded to the scene and saw that the sight glass on the Amercor 8750 bulk chemical tank was broken off. He took action by tapering off a wooden mop handle and driving it into the 3/4" opening where the sight glass had broken off.

4. Each bulk chemical tank has a 12-foot long by 3/4" diameter sight glass running vertically with each tank for determining the level of the chemical. These are constructed of heavy duty clear plastic tubing with PVC fittings attaching them to the tanks. The break occurred on the bottom screwed fitting between the valve and the tank. The screwed fitting is one of the weakest points of the sight glass.



Subj: INVESTIGATION OF CHEMICAL SPILL AT BUILDING 1700 STEAM PLANT OF 1 APR 87

5. There were no eye witnesses to give an on site review of what caused the sight glass to break. Interviewing Plant Personnel, Bob Baughn (Superintendent of McGraw-Morgan Co.), Mike Smith (Drew Chemical Co's representative) and my personal observation revealed that there were two probable causes of the broken sight glass: (1) A strong wind was blowing that day causing a swaying motion on the sight glass of the other tank. It appeared to be moving 1-2 inches at the center of the 12-foot span of tubing. It appears that the continued moving of the glass during the two years the tanks have been in existance caused the PVC pipe to deteriorate to the point of breakage. (2) There was also an aluminum ladder laying beside the tank. This has been used to go on top of the tanks at given times. One of the personnel interviewed indicated that the wind could have blown the ladder into the sight glass breaking if off. This option was ruled out since the laddder was laying on the right of the sight glass in a straight position, parallel with the wall, as if it had been stored in that area.

6. The berm drain valve was in the partially open position allowing the chemical to flow into the open ditch. It is standard practice to keep the berm drain closed, and open only to drain the accumulation of water out of the berm area. It was noted during the neutralization and wash down of the contained chemical that the retaining wall would not hold back the chemicals even if the valve had been closed. The cracks and pores of the block retaining wall allowed the chemical and water to seep to the outside.

7. Over the past 40 years, a variety of boiler chemicals have been used aboard Camp Lejeune to protect boilers and steam lines. The standard operating practice for these different chemicals has been structured around the chemical companies' guidelines, safety data sheets, visits and inspections by Base Safety, Industrial Hygiene Office, and Utility personnel. There are safety data sheets posted and the recommended protective gear is provided at each steam plant. Up until this time, there has never been any recommendation that the chemicals being used are of the nature that a chemical spill contingency plan is needed.

8. Along with the above findings, the following corrective actions have been taken:

(1) The broken pipe nipple has been removed and the openings plugged on the leaking chemical tank. Also, the sight glass was removed from the other tank and these openings were plugged. The sight glasses were stained from chemical residue so that level accuracy was very hard to determine. Future level readings will be taken from the manhole on top of the tanks.

2



Subj: INVESTIGATION OF CHEMICAL SPILL AT BUILDING 1700 STEAM PLANT of 1 APR 87

(2) The berm drain value has been chained and locked in the closed position.

(3) Work Request 149-87 has been submitted in enclosure (2) to make temporary repairs to the block retaining wall to prevent the chemical from going through the pores and cracks of the blocks. For the permanent fix, a project has been submitted to procure tanks, pumps, and to build a retaining wall that is adequate for chemical spills.

(4) The oil and hazardous substance spill contingency plan is being utilized at this time and will be used until it is determined that another plan should be established, specifically for chemicals. A sign has been posted at the site for calling the fire department and a directive put in the plant standard operating procuedure to evacuate the immediate area of the spill.

(5) Enclosure (3) has been sent to the Administrative Branch to request a survey of all steam plants to ensure the proper handling and storage of boiler water chemicals. Safety Data Sheets for chemicals in bulk tanks are provided in enclosure (4).

9. In conclusion, the investigation points toward the possibility of the wind breaking the sight glass since there were no eye witnesses to the accident. As the work request, projects, and surveys materialize, the Utilities personnel and plant facilities will be in a better state of readiness to handle future spills.

D J Souther and



NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS Marine Corps Base Camp Lejeune, North Carolina 28542 27 May 87 Date From: Director DX To: Da Sie attachel, sachage Subj: portaining to ozone dipleten I appears For is hardling this. Sue is checking - She think gaee for 1guest Julia Bob hos action .



Scotch® 7664 "Post-it" Routing-R ROUTING - REQUEST Please READ To <u>NREA</u> HANDLE	CONTROL NO. (Assigned by Base Adjutant)
	BASE CENTRAL FILES. NUMBERS INDICATE ORDER OF ROUTE.
and FORWARD	LY DUE:
RETURN	E RECEIVED:
KEEP OR DISCARD	.8 May 1987
Date 26 May 87 From ACS, FACILITI	TE
	HLUKUCARBUNS AND HALONS

		INFO	DATE		•			
	ACTION		IN	OUT	INITIAL	COMMENTS		
COMMANDING GENERAL					1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1			
CHIEF OF STAFF		2			R			
INSPECTOR				A la				
AC/S MANPOWER								
AC/S TRAINING								
AC/S FACILITIES	3		2 mary	26 May	4	Copy furnished NPEA		
AC/S COMPTROLLER			V	0				
AC/S MWR								
AC/S LOGISTICS		1						
AC/S BOSMAD								
RASC		-ke						
РМО		• 1				1		
SJA						and the		
CHAPLAIN						and the second		
ADJUTANT		1		5 20	M			
		1000				and a second second		
				1				
	apara na ang tang tang tang tang tang tang t	A	an a	anta laka it	a secondaria			

NUMBERS INDICATE ORDER OF ROUTE



MAIL CONTROL FORM MCBCL 5216/3 (REV. 1-86)

1.

CONTROL NO. (Assigned by Base Adjutant)

RETURN THIS FORM AND ATTACHED	CORRESPON	DENCE 1	O BASE CE	INTRAL FIL	ES. NUMBE					
FROM:	F	REPLY DUE:								
CMC										
DATE OF CORRESPONDENCE:		DATE RECEIVED:								
8 May 1987		18 May 1987								
ORIGINATOR'S SYMBOL: LFL/2-787										
SUBJECT: MARINE CORPS USAGE OF CHOLO	OROFLUROCA	RBONS	, CHLORO	CARBONS	AND HAL	ONS				
	and the second second		DATE							
	ACTION	INFO	IN	OUT	INITIAL	COMMENTS				
COMMANDING GENERAL					A Maria	· · ·				
CHIEF OF STAFF	· · ·	2			R					
INSPECTOR					1. 1.					
AC/S MANPOWER										
AC/S TRAINING										
AC/S FACILITIES	3		amary	26 May	4	Copy furnished NREA				
AC/S COMPTROLLER			V	U						
AC/S MWR			1 Mary		1. 10 A 4					
AC/S LOGISTICS	A Parking									
AC/S BOSMAD		1 de la								
RASC										
PMO		•				12				
SJA										
CHAPLAIN						and a start of the second				
ADJUTANT		1		5 20	M					
	2.42 - 2-09.42.7 <u>9</u>									
	Contraction of the	i de la des	and the set							

NUMBERS INDICATE ORDER OF ROUTE





DEPARTMENT OF THE NAVY HEADQUARTERS UNITED STATES MARINE CORPS WASHINGTON, D.C. 20380-0001 18 MAY 1987 ACTION: BFAC Route original

> LFL/2-787 08 MAY: 1987

From: Commandant of the Marine Corps

- Subj: MARINE CORPS USAGE OF CHLOROFLUOROCARBONS, CHLOROCARBONS AND HALONS
- Ref: (a) Clean Air Act
- Encl: (1) Background Information on Potential Ozone Depleters
 - (2) Quantitative Information on Use of Halons
 - (3) Qualitative Information on Use of Potential Ozone Depleters <u>Other Than Halons</u>

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

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

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

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



LFL/2-787

Subj: MARINE CORPS USAGE OF CHLOROFLUOROCARBONS, CHOROCARBONS AND HALONS

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

ER Boston

E. R. ZAPTIN By direction

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

Copy to: COMMARCORBASESPAC COMCABEAST COMCABWEST



LFL/2-787

BACKGROUND INFORMATION ON POTENTIAL OZONE DEPLETERS (PODs)

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

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

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

Encl: (1)



QUANTITATIVE INFORMATION NEEDED ON USAGE OF HALONS

Aggregate Quantities for Each Intended System/Use_(In_1000_1b_Units)

Halon Type		Procured Emitted ²			Emission ⁴	Detection5	a the set of	
(1211 or 1301)	System/Use ¹	On Hand	Per Year	Per Year	Substitutes ³	Controls	System(s)	Remarks ⁶

Fnc

(2)



NOTES ON HALON FORM

- Make a specific entry for each intended class of uses for each Halon type. These include: (1) on board systems for aircraft, vehicles and/or ships; (2) crash and response vehicles; (3) hand-held units; (4) area systems for the following classes of facilities: a) computer, b) command, control and communication centers, c) trainers, and/or d) work/storage; (5) quantities held in reserve; and/or (6) other specific applications (identify).
- 2. Quantities emitted to the atmosphere are part of the intended system use, testing, training, servicing, and/or accidental releases or leaks.
- 3. Indicate chemical name of known (non-Halon) substitutes for the intended class uses.
- 4. Types of control equipment, recovery processes or other procedural or operational techniques to limit releases of Halons to the atmosphere.
- 5. For 1301 area systems, identify the detection, activation and/or procedural steps in place to minimize false discharges.
- 6. Remarks section should indicate if data came from a dedicated survey, existing records or are "best estimates." This section can also be used to refer to attachment on planned changes (increase/decrease) in Halon use, studies underway on process modification, etc.

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

- o Reports on the effectiveness of Halons for the intended use and comparison or findings on the effectiveness or deficiencies of substitute materials.
- o Evaluations or studies on the criticality of Halons for specific operational uses.
- o To the extent practicable, estimate future growth in procurement of Halons along existing use lines plus identify new or significant changes in requirements or needs of Halons (e.g., new weapon or support systems, new use area, etc., (format similar to the foregoing table may be used)).



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

Encl (3)



NOTES ON POTENTIAL OZONE DEPLETERS OTHER THAN HALON

- 1. Chemical name and formula.
- 2. POD Class (e.g., CFC or Chlorocarbon).
- 3. Specific end use or process(es) involvement.
- 4. Static quantities in systems, process tanks, or reserve storage.
- 5. Quantities consumed or destroyed (not emitted) as part of its use.
- Quantities emitted to the atmosphere as part of the intended process, testing, training, and/or accidental releases, spills or leaks.
- 7. Quantities disposed due to expiration of shelf life or other signs of non-effectiveness.
- 8. Indicate chemical name of known (non-POD) substitutes for the intended use.
- 9. Remarks section should indicate if data came from a dedicated survey, existing records, or are "best estimates." This section can also be used to refer to attachments on planned changes (increase/decrease) in use, studies underway on process modifications, etc.
 - a. Reports on the effectiveness of POD materials foddress the issues. EPA has begun collecting data on POD production, usage, imports and exports as part of their decision to regulate and, if so, to what extent.





ROUTINE

R 0719412 MAY 87

FM CG MCB CAMP LEJEUNE NC//BLDG//

TO CG II MAF//SUPO/MAINTO// CG S CG SECOND MAW//SUPO/MAINTO// CG S CG SECOND FSSG//SUPO/MAINTO// MCAS CG MCAS CHERRY PT NC//SC-221// MAG MAG TWO NINE//SUPO/MAINTO// MCB NAVHOSP CAMP LEJEUNE NC//SUPO/MAINTO// NAVDENCLINIC CAMP LEJEUNE NC//SUPO/MAINTO//

CG SECOND MARDIV//SUPD/MAINTO// CG SIXTH MAB//SUPD/MAINTU// MCAS NEW RIVER NC//SUPD/MAINTD// MAG TWD SIX//SUPD/MAINTD// MCB CAMP LEJEUNE NC//SUPU/MAINTD//

UNCLAS //N04400//

SUBJ: DSSC INFORMATIONAL BULLETIN 6-87 (SAFETY ALERT - INDUSTRIAL CARBON DIDXIDE CYLINDERS NSN 8120-00-151-9749)

A. COMPRESSED GAS ASSOCIATION SAFETY ALERT OF DECEMBER 1986

1. THE REF PROMULGATED A SAFETY ALERT ON THE SUBJ CYLINDERS. SEVERAL INCIDENTS HAVE BEEN REPORTED TO THE COMPRESSED GAS ASSOCIATION WHERE THE CYLINDERS RUPTURED. THESE INCIDENTS CAUSED BUILDING AND PROPERTY DAMAGE AND ONE CASE OF SERIOUS PERSONEL INJURY. IN ALL CASES THE CAUSE WAS A COMBINATION OF WRONG PRESSURE RELIEF VALVE AND OVERFILLING OF THE CYLINDER.

2. CYLINDER VALVES WITH A "BACKED" (VENT HOLES FILLED WITH FUSE METAL WITH LOW TEMPERATURE MELTING POINT) PRESSURE RELIEF DEVICE ARE NOT THE PROPER VALVES TO USE ON INDUSTRIAL CARBON DIOXIDE CYL. THE PROPER DEVICE IS THE RUPTURE DISK TYPE IN WHICH THE VENT HOLES ARE OPEN. THIS DEVICE HAS FOUR TO SIX DISCHARGE PORTS WHICH MUST BE OPEN.

3. USING UNITS ARE REQUESTED TO VISUALLY INSPECT CARBON DIDXIDE CYLINDERS TO DETERMINE WHICH TYPE OF PRESSURE RELIEF VALVE IS ATTACHED TO THEM. REPORT TO THE DSSC (SHOP STORES BRANCH,

DLVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...ACT DLVR:NAVHOSP CAMP LEJEUNE NC(4)...ACT

BLDG(2)...DRIG FOR CG MCB CAMP LEJEUNE(120) DSSC(1) SUPD(1) BCDS(1) BSDD(1) GSTF(12) SSTF(85) DCDR(14) CEDA(1) MAIN(1) DICB(1)

/13/

RTD:000-000/COPIES:0128

983226/127 CSN:RXIA00058

1 DF 2 MATA0426 127/22:32Z

0719412 MAY 87 CG MCB CAMP LE

TELEPHONE 451-2207) THE NUMBER OF CYLINDERS THAT ARE FITTED WITH THE IMPROPER VALVE AND DISPOSITION INSTRUCTIONS WILL BE FURNISHED.

4. DSSC PDC'S ARE MR WATERS OR MRS BENDER TELEPHONE 451-2207/ 5105.

5. REQUEST THIS BULLETIN PE GIVEN WIDE DISSEMINATION.

BT

983225/127 CSN:RXIA00058 2 DF 2 MATA0426 127/22:32Z

071941Z MAY 87 CG MCB CAMP LE



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

IN REPLY REFER TO: 12410 FAC MAY 0 8 1987

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

Dear Ms. Long:

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

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

Sincerely,

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

Encl: (1) List of Attendees

Blind copy to: MAIN NREAD FIRE


MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA

LIST OF ATTENDEES

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



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



DATE: 5 May 1987

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

SUBJ: NEW AND USED LITHIUM BATTERY DISPOSAL

Ref:

(a) FONECON btwn Cpl Milligan, PMO, and Mr. Martin, NREAD, on 4 May 87 (b) BO 6240.5A

- incl:
- (1) Map depicting Lithium Battery Disposal Site(2) Polaroid Photo of Lithium Batteries

1. During reference (a), NREAD personnel were advised of subject batteries (hazardous waste) being disposed of in unauthorized manner, (reference (b)) in a forested area behind LOT 201. Enclosure (1) depicts general location of the batteries. Enclosure (2) shows the lithium batteries and a mount out box with tactical number 2001. The mount out box contains some of the lithium batteries.

2. It is recommended a JAG investigation be initiated to gather facts in this case.

3. NREAD has placed plastic over the lithium batteries until appropriate means of handling them can be determined.

Ailian I. Woot





LITHIUM BATTERY 0 SITE PREPARED BY NREAD 4 may 87

Enclosure 11









DEPARTMENT OF THE NAVY NAVAL HOSPITAL CAMP LEJEUNE, NORTH CAROLINA 28542-5008

IN REPLY REFER TO 6260.3g9 371 4 May 87

Mr. 4

From: Commanding Officer To: Commanding General, Marine Corps Base, Camp Lejeune, NC 28542 (Attn: AC/S Facilities Department)

Subj: SUBSTITUTION OF HAZARDOUS MATERIALS

Ref: (a) CO, NHCLNC ltr 6260.3g9, 371, dtd 5 Feb 87

1. In reference (a), the Industrial Hygiene Branch requested that Material Safety Data Sheets (MSDS) on possible substitutes for materials containing suspect human cancer-causing substances be sent to this office for review before the materials are actually purchased.

2. The MSDS's on "Sure Shot" and "Big Kill", manufactured by Pro Chem, Inc. were received and reviewed. No information was found to indicate that these materials contain suspect human cancer-causing substances. If these materials are to be substituted personnel should wear goggles and gloves when using them and make sure areas of use are well ventilated.

3. Please continue to make substitutions where possible and forward the MSDS's to the Industrial Hygiene Branch for review.

4. Contact Mr. J. Jones, Industrial Hygienist, at extension 2707 for continued assistance.

M. P. GENTRY

By direction

Copy to: Shop 76 Insect Vector Control Base Safety



Bills will be mailed for the 15 June 87 m Due: Jul 1:875 Glence: Drit Worry about it, There will not be a hassle. for Check with S Solid-HAZ waste Branch on why we haven't secenced a bill for The upcoming year for HW Fees 1). Share 4 may 86. 32



Glence:

Check with STATE Solid-HAZ waste Branch on why we haven't secenced a bill for The upcoming year for HW Fees

D. Share

4 may 86.

32



T-6240 25 Feb 86 ngle 000 000 vine, M.D., M.P.H. ate Health Director NULLI CATUIINA GENERATOL ers or Disposers (TSD's) of Hazardous Waste. William L. Meyer, Head Alleon & Meyer FROM: Solid & Hazardous Waste Mangement Branch

Environmental Health Section

SUBJECT: Annual Fees Billing For Handlers of Hazardous Waste.

Effective January 1, 1986, all handlers of hazardous waste are required by administrative rule 10 NCAC 10C .0701 through .0704 to pay an annual fee . The above rules were adopted November 13, 1985, as authorized by GS 130A - 294 (a) (7) which was ratified July 3, 1985. A copy of the adopted rules is included with this billing.

One-half the annual fee will be collected in FY 86. The amount of your fee is included on the attached invoice. Checks should be made payable to the Division of Health Services and mailed to William 'L. Meyer, Solid & Hazardous Waste Management Branch, P.O. Box 2091, Raleigh, N.C. 27602-2091

Public meetings were held by the N.C. Department of Human Resources October 23 in Greenville, October 24 in Hickory, and a public hearing was held October 25, 1985 in Raleigh on the annual fee rules for handlers of hazardous waste. Based on public comments at the meetings and the hearing and many written comments the final rules were modified considerably. The changes made directly reflect the comments received from the public. The majority of those commenting on the rules would like to submit a rulemaking petition in January 1986 to modify the rules even further as permitted in the administrative procedure rule 10 NCAC 4B. The Branch supports the rulemaking petition effort. Additional public meetings and hearings will be held and we anticipate that these rules will be modified prior to the next billing in July of 1986.





T-6240

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

December 5, 1985

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

MEMORANDUM

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

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

SUBJECT: Annual Fees Billing For Handlers of Hazardous Waste.

Effective January 1, 1986, all handlers of hazardous waste are required by administrative rule 10 NCAC 10C .0701 through .0704 to pay an annual fee . The above rules were adopted November 13, 1985, as authorized by GS 130A - 294 (a) (7) which was ratified July 3, 1985. A copy of the adopted rules is included with this billing.

One-half the annual fee will be collected in FY 86. The amount of your fee is included on the attached invoice. Checks should be made payable to the Division of Health Services and mailed to William 'L. Meyer, Solid & Hazardous Waste Management Branch, P.O. Box 2091, Raleigh, N.C. 27602-2091

Public meetings were held by the N.C. Department of Human Resources October 23 in Greenville, October 24 in Hickory, and a public hearing was held October 25, 1985 in Raleigh on the annual fee rules for handlers of hazardous waste. Based on public comments at the meetings and the hearing and many written comments the final rules were modified considerably. The changes made directly reflect the comments received from the public. The majority of those commenting on the rules would like to submit a rulemaking petition in January 1986 to modify the rules even further as permitted in the administrative procedure rule 10 NCAC 4B. The Branch supports the rulemaking petition effort. Additional public meetings and hearings will be held and we anticipate that these rules will be modified prior to the next billing in July of 1986.







r

• Revisions will be considered by a proposed committee in early January. The committee is proposed to consist of:

Representative

Solid & Hazardous Waste Management Branch	William L. Meye
Rep. from Envir. Groups	Bill Holman
Citizens for Business & Industry	Edith Marsh
Gov. Waste Mgt. Board	Edgar Miller
Rep. from NRCD	to be named
H.W. Treatment Commission	to be named
N.C. Textile Manufacturing Association	to be named
N.C. Hospital Association	to be named
Other concerned citizens or groups, not to exceed	10 members







10 NCAC 10C .0701 through .0704 have been adopted as follows:

Section .0700 ANNUAL FEES FOR HANDLERS OF HAZARDOUS WASTE

.0701 APPLICABILITY AND FEE SCHEDULE

(a) Any person who handles hazardous waste for which an identification number is required under 10 NCAC 10F is subject to annual fees for each activity as follows:

Generators\$ 600.00Transporters600.00Generators and Transporters900.00Treatment, Storage, and/or Disposal Facilities1,200.00Treatment, Storage, and/or Disposal Facilities1,200.00that are also generators or transporters of1,200.00

(b) Small quantity generators, as defined in 10 NCAC 10F .0029, shall be exempt from these annual fee requirements.

History Note: Statutory Authority G. S. 130A-294(a)(7); Eff. January 1, 1986.

.0702 PAYMENT OF FEES

(a) The annual fee is based on a fiscal year beginning July 1 and ending June 30 the next calendar year. The annual fee for fiscal year 1985-86 shall be 1/2 the annual rate, due and payable on January 1, 1986. Thereafter, all annual fees will be due and payable on July 1 of each fiscal year.

(b) Any person notifying the Division of Health Services of hazardous waste handling or any person submitting a permit application for a treatment, storage or disposal facility, shall pay the appropriate annual fee within 30 days of notification or receipt, by the Division, of the permit application.

(c) Check shall be made payable to the Division of Health Services and mailed to the Solid and Hazardous Waste Management Branch, P.O. Box 2091, Raleigh, N. C., 27602-2091.

(d) All fees imposed by this section are nonrefundable.

History Note: Statutory Authority G.S. 130A-294(a)(7); Eff. January 1, 1986.







.0703 APPEALS

Appeal procedures shall be in accordance with Article 3 of the Administrative Procedure Act and the rules in 10 NCAC 1B.

History Note: Statutory Authority G.S. 130A-294(a)(7); Eff. January 1, 1986.

.0704 SEVERABILITY

If any provision of these standards or its application to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of the standards that can be given effect without the invalid provisions or applications, and to this end the provisions of these standards are declared to be severable.

History Note: Statutory Authority G.S. 130A-294(a)(7) Eff. January 1, 1986.







James G. Martin, Governor Phillip J. Kirk, Jr., Secretary Ronald H. Levine, M.D., M.P.H. State Health Director

December 10, 1985

INVOICE

N.C. Treater, Storer, or Disposer and/or combined Hazardous Waste Facility.

TO:

NC6170022580 Alexander. Bob Ecologist US Marine Corps Base Camp LeJeune Marine Corps Base Camp LeJeune NC 28542

Amount of Annual fees due \$600, as required by Administrative Rule 10 NCAC 10C .0701 through .0704.

PLEASE MAKE CHECK PAYABLE TO: Division of Health Services

MAIL TO: William L. Meyer Solid & Hazardous Waste Management Branch P.O. Box 2091 Raleigh, NC 27602-2091





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

December 10, 1985

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

INVOICE

N.C. Generator of Hazardous Waste

TO:

NC8170022570 Alexander Bob US Marine Corps Air Station (H)New River Comdg Gen - Off AC/S Fac Camp LeJeune NC 28546

Amount of annual fees due is \$300 as required by Administrative Rule 10 NCAC 10C .0701 through .0704.

PLEASE MAKE CHECK PAYABLE TO: Division of Health Services

MAIL TO: William L. Meyer Solid & Hazardous Waste Management Branch P.O. Box 2091 Raleigh, NC 27602-2091



A.V.W 1.5 Apr 86 Julian. Ser Terry Dover Fore Con This Mornini, I may a penalty (double fee) may be charged. If can't get it paid then a letter may suffice. Requisition: I Am young to Thy to get it paid on time. DDS





James G. Martin, Governor Phillip J. Kirk, Jr., Secretary Ronald H. Levine, M.D., M.P.H. State Health Director

April 15, 1986

INVOICE

N.C. Treater, Storer, or Disposer and/or combined Hazardous Waste Facility.

TO: NC6170022580 TSD

Command General United States Marine Corps Base Camp LeJeune, North Carolina 28542

ATTENTION: AC/F, Facilities (Chief of Staff)

Amount of Annual fees due \$600, as required by Administrative Rule 10 NCAC 10C .0701 through .0704 .

PLEASE MAKE CHECK PAYABLE TO: Division of Health Services

MAIL TO: William L. Meyer Solid & Hazardous Waste Management Branch P.O. Box 2091 Raleigh, NC 27602-2091





From: Commanding General, M To: Distribution

UN

CHE

Subj: COMMANDING OFFICER'S

Encl: (1) CO, LANTNAVFACENG (2) Hazardous Waste Cl

1. Environmental management is a responsibility of all commanding officers, subordinate commanders, and civilian managers. Enclosure (1) discusses civil and criminal penalties which may be imposed on you and me for violation of environmental laws and regulations. As Commanding General of Marine Corps Air Station, Cherry Point, I am legally responsible for actions which may lead to violations aboard this air station including the actions of tenant commands. However, it must be understood that any person in responsible charge of a unit's operation or activity can be held personally liable for violations of environmental laws by individuals under their supervision, "if they know or should have known" the action was a violation.

00

eTZ

Sarbe

te enclosure(2)

60

nfo

Shape

Review

2. Recent additions to the North Carolina hazardous waste regulations will significantly impact on hazardous waste management aboard MCAS Cherry Point. The most important regulatory change is the introduction of Class I violations to the state hazardous waste enforcement regulations. Class I violations will normally result in a compliance order for correction of violations within a specified time limit and assessment of a financial penalty. The penalty can include jail sentences and fines of up to \$10,000 per day per violation. Definitions of Class I violations and examples of such violations found at Cherry Point are listed in enclosure (2). During past hazardous waste inspections, the air station was given a grace period to correct violations. We will no longer be afforded this luxury; penalties will be assessed for each violation the state identifies.

3. The state has informed us that its inspection frequency has been dramatically reduced due to cuts in federal funding. Consequently, although the inspections will be less frequent, the intensity of the inspections and the penalties imposed for violations will increase. An additional concern is that the state has announced that a high percentage of hazardous waste inspections in FY86 will be unannounced. We have been advised that the next hazardous waste inspection will be a joint effort by the North Carolina Solid and Hazardous Waste Management Branch and the United States Environmental Protection Agency. Both of these agencies may act independent of each other in the imposition of penalties against the air station for Class I violations.

4. The Natural Resources and Environmental Affairs Department of the Installations and Logistics Directorate is responsible for disseminating information

Subj: COMMANDING OFFICER'S ENVIRONMENTAL RESPONSIBILITIES AND LIABILITIES

and providing assistance to individual units for compliance with environmental regulations. If you have questions or require additional information concerning this subject, contact Doug Nelson or Gary Edwards at extension 4186/3631.

5. In summary, protection of the environment and strict compliance with environmental laws and regulations is a serious matter. Become familiar, if you have not done so already, with the environmental directives which regulate unit activities.

AMES M. MEAD

Distribution: A-2


UN (Note enclosure(2)) CHE Barbee This From: Commanding General, M (4 To: Distribution LAST 5 COMMANDING OFFICER'S Subi: Enc1: (1) CO, LANTNAVFACENG Shape (2) Hazardous Waste Cl

1. Environmental management is a responsibility of all commanding officers, subordinate commanders, and civilian managers. Enclosure (1) discusses civil and criminal penalties which may be imposed on you and me for violation of environmental laws and regulations. As Commanding General of Marine Corps Air Station, Cherry Point, I am legally responsible for actions which may lead to violations aboard this air station including the actions of tenant commands. However, it must be understood that any person in responsible charge of a unit's operation or activity can be held personally liable for violations of environmental laws by individuals under their supervision, "if they know or should have known" the action was a violation.

2. Recent additions to the North Carolina hazardous waste regulations will significantly impact on hazardous waste management aboard MCAS Cherry Point. The most important regulatory change is the introduction of Class I violations to the state hazardous waste enforcement regulations. Class I violations will normally result in a compliance order for correction of violations within a specified time limit and assessment of a financial penalty. The penalty can include jail sentences and fines of up to \$10,000 per day per violation. Definitions of Class I violations and examples of such violations found at Cherry Point are listed in enclosure (2). During past hazardous waste inspections, the air station was given a grace period to correct violations. We will no longer be afforded this luxury; penalties will be assessed for each violation the state identifies.

3. The state has informed us that its inspection frequency has been dramatically reduced due to cuts in federal funding. Consequently, although the inspections will be less frequent, the intensity of the inspections and the penalties imposed for violations will increase. An additional concern is that the state has announced that a high percentage of hazardous waste inspections in FY86 will be unannounced. We have been advised that the next hazardous waste inspection will be a joint effort by the North Carolina Solid and Hazardous Waste Management Branch and the United States Environmental Protection Agency. Both of these agencies may act independent of each other in the imposition of penalties against the air station for Class I violations.

4. The Natural Resources and Environmental Affairs Department of the Installations and Logistics Directorate is responsible for disseminating information Subj: COMMANDING OFFICER'S ENVIRONMENTAL RESPONSIBILITIES AND LIABILITIES

and providing assistance to individual units for compliance with environmental regulations. If you have questions or require additional information concerning this subject, contact Doug Nelson or Gary Edwards at extension 4186/3631.

5. In summary, protection of the environment and strict compliance with environmental laws and regulations is a serious matter. Become familiar, if you have not done so already, with the environmental directives which regulate unit activities.

AMES M. MEAD

Distribution: A-2



UNITED STATES MARINE CORPS MARINE CORPS AIR STATION CHERRY POINT, NORTH CAROLINA 28533-5001

> 6280 LMN **28 May 86**

From: Commanding General, Marine Corps Air Station, Cherry Point To: Distribution

Subj: COMMANDING OFFICER'S ENVIRONMENTAL RESPONSIBILITIES AND LIABILITIES

Encl: (1) CO, LANTNAVFACENGCOM 1tr 6280 1142PBP of 31 Mar 86 w/enclosures (2) Hazardous Waste Class I Violations List

1. Environmental management is a responsibility of all commanding officers, subordinate commanders, and civilian managers. Enclosure (1) discusses civil and criminal penalties which may be imposed on you and me for violation of environmental laws and regulations. As Commanding General of Marine Corps Air Station, Cherry Point, I am legally responsible for actions which may lead to violations aboard this air station including the actions of tenant commands. However, it must be understood that any person in responsible charge of a unit's operation or activity can be held personally liable for violations of environmental laws by individuals under their supervision, "if they know or should have known" the action was a violation.

2. Recent additions to the North Carolina hazardous waste regulations will significantly impact on hazardous waste management aboard MCAS Cherry Point. The most important regulatory change is the introduction of Class I violations to the state hazardous waste enforcement regulations. Class I violations will normally result in a compliance order for correction of violations within a specified time limit and assessment of a financial penalty. The penalty can include jail sentences and fines of up to \$10,000 per day per violation. Definitions of Class I violations and examples of such violations found at Cherry Point are listed in enclosure (2). During past hazardous waste inspections, the air station was given a grace period to correct violations. We will no longer be afforded this luxury; penalties will be assessed for each violation the state identifies.

3. The state has informed us that its inspection frequency has been dramatically reduced due to cuts in federal funding. Consequently, although the inspections will be less frequent, the intensity of the inspections and the penalties imposed for violations will increase. An additional concern is that the state has announced that a high percentage of hazardous waste inspections in FY86 will be unannounced. We have been advised that the next hazardous waste inspection will be a joint effort by the North Carolina Solid and Hazardous Waste Management Branch and the United States Environmental Protection Agency. Both of these agencies may act independent of each other in the imposition of penalties against the air station for Class I violations.

4. The Natural Resources and Environmental Affairs Department of the Installations and Logistics Directorate is responsible for disseminating information

Subj: COMMANDING OFFICER'S ENVIRONMENTAL RESPONSIBILITIES AND LIABILITIES

and providing assistance to individual units for compliance with environmental regulations. If you have questions or require additional information concerning this subject, contact Doug Nelson or Gary Edwards at extension 4186/3631.

5. In summary, protection of the environment and strict compliance with environmental laws and regulations is a serious matter. Become familiar, if you have not done so already, with the environmental directives which regulate unit activities.

AMES M. MEAD

Distribution: A-2



DEPARTMENT OF THE NAVY

ATLANTIC DIVISION NAVAL FACILITIES ENGINEERING COMMAND NORFOLK, VIRGINIA 23511-6287 TELEPHONE NO.

(804) 445-2933 IN REPLY REFER TO: 6280 1142PBP 3 1 MAR 1986

From: Commander, Atlantic Division, Naval Facilities Engineering Command

- Subj: COMMANDING OFFICER RESPONSIBILITIES AND LIABILITIES IN THE ENVIRONMENTAL ARENA
- Ref: (a) OPNAVINST 5090.1 of 26 May 83
- Encl: (1) List of Federal Environmental Laws and Authorized Penalties for Violations
 - (2) Environmental Quality Branch Organization Chart

1. As control of environmental programs transfers from the U.S. Environmental Protection Agency to various state and local agencies, the administration and enforcement of these programs becomes more and more aggressive. I would anticipate this trend to continue and perhaps accelerate. Considering this, I believe it is necessary to review with you the responsibilities and liabilities all of you have as activity Commanding Officers.

2. Reference (a), Chapter 1, Paragraph 1307.b sets forth the responsibilities of activity Commanding Officers regarding environmental protection. You are required to coordinate and cooperate with federal, state, interstate, and local pollution control agencies and to adhere to the standards with respect to the control and abatement of environmental pollution. In carrying out these responsibilities, you must insure that the necessary resources to plan, program, and execute these program requirements are available at your activity. We will continue to provide Engineering Field Division support and project funding to you through our environmental office.

In addition to the fiscal responsibilities in implementing environmental 3. quality programs, you may be held personally liable under many of the existing federal environmental laws for action you take or fail to take with regard to environmental matters at your activity. Enclosure (1) is a list of federal environmental laws and some authorized penalties for violations of these statutes. Liability may be either civil or criminal. Civil liability for noncompliance is levied against the Navy. An example of civil liability would be a violation at a permitted sewage treatment plant due to equipment malfunction with no particular individual held liable. In criminal liability, you and anyone else involved in the violation could be cited for criminal violations for noncompliance with environmental laws and regulations. Criminal charges may be levied for knowingly or willfully violating the standards established in many environmental regulations or for withholding or falsifying information in connection therewith. Examples would include knowing of (or should have known of) a violation and failing to allocate resources to abate the violation, or falsifying documents that must be submitted to a regulatory agency. If you are a criminal defendant in an environmental case, you will normally have to obtain defense counsel at your own expense and will not be reimbursed by the Government for such expense.

Subj: CONMANDING OFFICER RESPONSIBILITIES AND LIABILITIES IN THE ENVIRONMENTAL ARENA

4. In one incident in another engineering field division, a state was preparing to file criminal charges against a Commanding Officer for knowingly and willfully violating both state and federal environmental standards. The possible penalty was a fine of \$100K and/or five years imprisonment. It is important to note that while the Commanding Officer had no personal knowledge of the environmental problem, he was still considered personally responsible by the state for the actions at his activity. In this particular case, the Navy and the state reached an agreement for immediate corrective action that resolved the situation short of court action.

5. I urge you to review enclosure (1) with your environmental staff and familiarize yourself with it. My staff is available to assist you and to provide further explanation of these laws. If you would like assistance, please contact our environmental office at the telephone numbers listed in enclosure (2).

D. E. BOTTORFF

Distribution: COMNAVBASE Norfolk CO NAVSTA Norfolk CO NAS Norfolk CO NAVAIREWORKFAC Norfolk CO NSC Norfolk CO FLETRACEN Norfolk CO PWC Norfolk COM NAVSHIPYD Norfolk CO NAS Oceana CO NAVPHIBASE Little Creek CO FCTCLANT Dam Neck CO WPNSTA Yorktown OIC NSC Norfolk Cheatham Annex CO NAVCAMS LANT Norfolk CO NAVHOSP Portsmouth CO NAVORDSTA Louisville CO MCAS Cherry Point CO NAVAIREWORFKFAC Cherry Point CG MARCORB Camp Lejeune ABL Cumberland CO AFXTRACTY Camp Peary

Regulations. If you have

2

Subj: COMMANDING OFFICER RESPONSIBILITIES AND LIABILITIES IN THE ENVIRONMENTAL ARENA

Distribution: (Continued) CO NAVSECGRUACT Northwest NSC Norfolk (Craney Island) CO NAVRADSTA R Sugar Grove CO NAVSECGRUACT Sabana Seca CO NAVSTA Roosevelt Roads

Copy to: CINCLANTFLT COMNAVAIRLANT COMNAVSUBLANT COMNAVSURFLANT CINCUSNAVEUR CMC (LFF-2)



Maximum Penalities For Environmental Violations

CIVIL CHARGES

CRIMINAL CHARGES

STATUTE	NONCOMPLIANCE	WILLFULLY OR NEGLIGENTLY VIOLATING	WITHHOLD OR FALSIFY INFORMATION
-Clean Air Act	\$25K/Day Injunction	\$25K/Day, l Yr. Jail	\$10K/Day, 6 Mo. Jail
-Federal Water Pollution Control Act, as Amended by the Clean Water Act of 1977	Injunction	\$25K/Day, 1 Yr. Jail	\$10K/Day, 6 Mo. Jail
-Resource Conservation and Recovery Act_of 1976	\$25K/Day, Injunction	\$50K/Day, 2 Yr. Jail	\$25K/Day, l Yr. Jail
-Comprehensive Environmental Response, Compensation, and Liability Act of 1980	N/A	\$10K/Day, 1 Yr. Jail	\$20K/Day, l Yr. Jail
-Safe Drinking Water Act	Compliance order;\$5K/Day	N/A	N/A
-Marine Protection, Research, and Sanctuaries Act of 1972	\$50K/Day	\$50K/Day, 1 Yr. Jail	N/A
-Rivers and Harbors Act of 1899	Injunction	\$2.5K 1 Yr. Jail	N/A
-Toxic Substances Control Act	\$25K/Day, Injunction	\$25K/Day, 1 Yr. Jail	N/A
-Federal Insecticide, Fungicide, and Rodenticide Act	\$1K	\$1K, 30 Days Jail	N/A
-Noise Control Act of 1972	\$10K/Day	\$25K/Day, l Yr. Jail	N/A
-National Ocean Pollution Planning Act of 1978	N/A	N/A	N/A
-The National Environmental Policy Act	N/A	N/A	N/A
-The Coastal Zone Management	N/A	N/A	N/A







CLASS I VIOLATIONS - A violation that:

- A. results in a release or serious threat of release of hazardous waste to the environment, or
- B. involves the failure to assure that groundwater will be protected,
- C. involves improper closure and post-closure activities, or
- D. involves the failure of hazardous wastes destined for permitted or interim status facilities to be delivered.

EXAMPLES OF CLASS I VIOLATIONS

- A. Failure to conduct required waste analyses.
- B. Failure to properly handle or store ignitable, reactive or incompatible wastes.
- C. Storage of wastes in containers that are not in good condition or have begun to leak.
- D. Failure to meet applicable general operating requirements.
 - 1. Failure to properly label drums of hazardous waste.
 - 2. Failure to move drums of hazardous waste to DRMO within 90 days.







Facility: 115	101
ID Number:	
Inspector: D	E11.5.00
Date: 3-31-	-87
Comments	

- B. Storage (§268.50)
 - 1. a. Were F001-F005 wastes exceeding treatment standards <u>stored</u>?

VYes No

Yes No

VYes No

Yes No

Yes No

Yes / No

If no, go to "C"

- b. Are all containers and tanks clearly marked to identify contents and date(s) entering storage?
- c. Do operating records track the location, quantity and dates wastes exceeding treatment standards entered and were removed from storage?
- d. Do operating records agree with container/tank labeling?
- e. Is waste exceeding treatment standards stored for less than 1 year?

If yes, can you show that such accumulation is <u>not</u> necessary to facilitate proper recovery treatment or disposal?

If yes, state how:

- f. Were tanks emptied and containers sent for treatment at least once per year, and do operating records show that the volume of waste removed from tanks annually at least equals tank volume?
- g. Was/is waste exceeding treatment standards stored for more than one year?

Nit Yes No

Yes No



Facility: ID Number: Inspector: Date: Comments If yes, state the owner/operators' proof that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or NA disposal: h. Are F-solvent wastes exceeding treatment standards "stored" in surface impoundments? Yes . No C. Treatment in Surface Impoundments (§268.4) NA 1. Were F001-F005 wastes exceeding treatment standards placed in surface Yes No impoundments for treatment? If no, go to "D" 2. Does the facility have acceptable evidence that treatment occurs in the impoundment? Yes No If yes, note the evidence 3. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably and in accordance with the sampling frequency and analysis specified in the waste analysis plan, and are the results in the operating record? Yes No 4. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards specified \ in §268.41? Yes No 5. Provide the frequency of analyses conducted on treatment residues: 6. Have the hazardous waste residues that exceed the treatment standards (§268.41) been removed adequately, and on an annual basis? No Yes DNA Comments TSDF - 3





TSDF -4



			Facility:
1.1	문제는 지수 방문의 관계가 가지 않았지? 승규는 것 같이 다.		ID Number:
			Inspector:
		I	Date:
D.	Treatment		
	1. Did the facility operate treatment	and the second second second	
	facilities for F-solvent waste		
	impoundments)?		
		Yes V No	
_	If no, go to "E"		
	2 Describe the treat		
	2. Describe the treatment		
	wastes:		
3.	Does the facility, in accordance		•
	with an acceptable waste analysis		
	plan, verify that the residue	·	
	extract from all treatment		
	processes for the F-solvent		
	standarde [6269 7(b)]2		
•		Yes No	A COLOMB CONCERNESS
4.	Describe frequency of testing of		
	treatment residuals.		
	the second s		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
5.	Was dilution used as a substitute		
	for treatment?	Yes No	
6.	Are certifications and results of waste		
	analyses kept in the operating record?	Yes No	
7.	Are notices with waste mumber	the second second	Charles and the second
	treatment standard, manifest		
	number, and analytical data		and the second second second
1	(where available) submitted for		
	each shipment of waste or treatment		
	stating that meets the treatment		
	treated to treatment performance		
	standards [§268.7(b)]?	Yes No	
8.	Are certifications submitted		
	for each shipment [§268.7(b)]?	Yes No	
	TSDF - 5	l salap sa sa ipiliping pina	

s .

.



-	
Facility	,
ID Numbe	r
Inspecto	or
Date	

÷

E. Land Disposal

- Were F-solvent wastes placed in land disposal units (landfills, surface impoundments[for this question, do not include if in "C"] waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vault or bunker?
- 2. Did facility have the notice and certification from generators in its operating record [§§268.7(c); 268.7(a), (b)]?
- 3. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [§268.7(c)]

If yes, at what frequency?

4. Were F-solvent wastes exceeding the treatment standards placed in land disposal units [268.30](excluding national capacity variances[268.30(a)] Yes

Yes No

Yes

Yes

Yes

No

No

No

If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case capacity extension [268.5] or variance [268.44] Yes No

- 5. Were F-solvent wastes subject to a national or case-by case capacity variance/extension disposed? Yes No
 - a. If yes, were these wastes disposed in a facility that has a new, replacement, or laterally expanded landfill or impoundment? Yes No

If (a) is yes, have the minimum technology requirements been met for all such units at the facility? Yes No

If (a) is yes, has the minimum technology requirements inspection been performed? Yes No



Facility	
ID Number	
Inspector	
Date	and the second second second
Date	and a later of the second second

Comments

- 6. Were adequate records of disposal maintained?
- 7. If wastes subject to a nationwide variances, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have notices [268.7(a)(3)] and records of disposal?
- 8. What is the volume of F-solvent waste disposed to date (by waste)?
- 9. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports?

· · ·

alter of the second



Yes No

Yes No







Inspector: D. Ellison Address: US EPA R ITE Telephone no: (404) 347-7663

RCRA LAND RESTRICTION F- SOLVENT GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

-	USME		Ne	Highway 24	& US Hickory
A. Hand	ler Name	the state of the state	B.	Street (or o	ther identifier)
	Camp he jeuni	NC	2	8542	Dostar
C. City		D. State	Ε.	Zip Code	F. County Na
All - Angeres	Military			and a second second second	and the state of the second
G. Nat	ure of business; Iden	tification of Operation	tions		
	NC INT DO 77	580			
H. EPA	ID #	.350			
			- 1 .		
I. Hand	iler Contact (Name and	Phone Nitmber)		10	
1.					
Conoratio	or Compliance				
General					
. F-Solv	vent Identification				Comments
1 0	the headles				
fo	ollowing wastes?	ite the			
·					
a.	F001		Yes _	_No ,	
ь.	F002		/ Vae	NIC	
	/		< "s -		
c.	F003 _ Y	es No			
	If an FOO3 wastestre	am listed			
	solely for ignitabil	ity was mixed			
	with a non-restricte	d solid or			
	resultant mixture ex	hibit the			
	ignitability character	eristic?	Yes	No	
đ.	F004		Vac	1.	
		-	- ies L		
e.	F005	-	Yes _	No	
		0700 10	and the second		/
2. 50	urce of the above. For		The set of		

whether the handler is generating F-solvent wastes, if such wastes were not identified by the handler previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below:



		Handler Name.
	and the second secon	ID Number:
		Inspector:
		Date:
в.	National Variances and Extensions/Petitions	
	1. Is the waste severated here a to	Comments
	Quantity Generator? [268.30(a)(1)] Yes No	
	2. Is the waste generated from a RCRA corrective action? [268.30(a)(2)] Yes No	Some
	3. Is the waste generated from a CERCIA response action? [268.30(a)(2)] Yes No	Some
	4. Is the solvent waste a solvent-water	
	mixture, solvent-containing sludge,	
	or solvent-contaminated soil contain-	
	FOOL-FOO5 constituents by weight?	
	[268.30(a)(3)]	Some
	5. Any extensions/petitions approved?	
с.	BDAT Treatability Grow - Treatment Standards	
	the appropriate treatability group	an that a strain said to ship
	the appropriate treatability group and treatment standards of the waste [§263.41]. Wastewaters containing solvents; spent methylene chloride in pharmaceutical wastewaters; all other spent solvent wastes]? Yes No	
D.	the appropriate treatability group and treatment standards of the waste [§268.41]. Wastewaters containing solvents: spent methylene chloride in pharmaceutical wastewaters; all other spent solvent wastes]?Yes No Waste analysis	
D.	<pre>the appropriate treatability group and treatment standards of the waste [§263.41]. Wastewaters containing solvents; spent methylene chloride in pharmaceutical wastewaters; all other spent solvent wastes]?Yes No <u>Waste analysis</u> 1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):</pre>	
D.	<pre>the appropriate treatability group and treatment standards of the waste [§268.41]. Wastewaters containing solvents: spent methylene chloride in pharmaceutical wastewaters; all other spent solvent wastes]?YesNo <u>Waste analysis</u> 1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a): a. knowledge of the wasteYesNo</pre>	
D.	<pre>the appropriate treatability group and treatment standards of the waste [§268.41]. Wastewaters containing solvents; spent methylene chloride in pharmaceutical wastewaters; all other spent solvent wastes]?YesNo <u>Waste analysis</u> 1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a): a. knowledge of the wasteYesNo b. TCLPYesNo</pre>	
D.	<pre>the appropriate treatability group and treatment standards of the waste [§268.41]. Wastewaters containing solvents: spent methylene chloride in pharmaceutical wastewaters; all other spent solvent wastes]?YesNo <u>Waste analysis</u> 1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a): a. knowledge of the wasteYesNo b. TCLPYesNo If knowledge, note how this is adequate:based on</pre>	procent usod
D.	the appropriate treatability group and treatment standards of the waste [§268.41]. Wastewaters containing solvents: spent methylene-chloride in pharmaceutical wastewaters; all other spent solvent wastes]? <u>Yes</u> No <u>Waste analysis</u> 1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a): a. knowledge of the waste <u>Yes</u> No b. TCLP <u>Yes</u> No If knowledge, note how this is adequate: <u>based on</u> If determined by TCLP, provide date of last test, frequency of testing, and attach test results.	procinct usod
D.	<pre>the appropriate treatability group and treatment standards of the waste [§263.41]. Wastewaters containing solvents: spent methylene chloride in pharmaceutical wastewaters; all other spent solvent wastes]?YesNo <u>Waste analysis</u> 1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a): a. knowledge of the wasteYesNo b. TCLPYesNo If knowledge, note how this is adequate:No If determined by TCLP, provide date of last test, frequency of testing, and attach test results. Dates/frequency:</pre>	procinct usod

.



	1
Handler	Name:
ID Numb	er:

Inspector: Comments 2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(2)]? Yes No Some 3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3] Yes / No E. Management 1. On-site management a. Were F-solvent wastes managed on-site? Yes No If yes, answer 1(b) and (c); if no, answer 2. b. For wastes that exceed treatment standards, was treatment, storage and/or disposal conducted? Yes ____ No Storage If yes, TSDF Land Restriction checklist must be completed. c. Are test results maintained in the operating record? Yes No 2. Off-site management a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]: Had example on says provided but no copy for shipment on (i) EPA waste number? Yes / No 1-12-87 manibest docunt. #74 (ii) Applicable treatment standard? Yes E xample has all of them V Yes 4 No (iii)Manifest number? (Attached) (iv) Waste analysis data, Turned up on if available? Identify off-site treatment facilities 4/1/87 before NEW York - will notonier use Left the B



Handler Name:	an a
ID Number:	
Inspector:	
Date:	and the second second second

b.	If F trea gene	-solvent wastes does not exce tment standards, did rator provide the disposal	ed		Comments
	faci	lity [268.7(a)(2)]:	NA		
	(i)	EPA Hazardous waste number?	Yes	No	
	(ii)	Applicable treatment standard?	Yes	No	
	(iii)Manifest number?	Yes	No	
	(iv)	Waste analysis data, if available?	Yes	No	
	(v)	Certification regarding waste and that it meets treatment standards?	Yes _	_No	e de Constante est
	Ident recei	ify land disposal facilities ving the BDAT certified	•		

c. If waste is subject to nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5) or petition (268.6) does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]?

F. Storage of F-solvent waste

 Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG)?

> If yes, was facility operatingunder interim status or permit?

If yes, TSDF Checklist must be completed.

NA

Yes No

Yes

Yes No

TSDF

No


•

Handler name ID Number Inspector Date

G. Treatment Using RCRA 264/265 Exempt Units or Processes

a satta e e e e e e

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?

Yes No

· · .

Capter and the sheet

Prante Sugar

If yes, list type of treatment unit and processes

.

Ling Back in

Residuals from RCRA-exempt treatment units are subject to Land Disposal Restrictions Program. Ascertain whether residuals have been subjected to restriction program requirements.







Handler Name:_____ ID Number: Inspector: Date:

APPENDIX A

SOLVENT IDENTIFICATION CHECKLIST

Comments

1. Does the handler generate any of the following FOOL constituents (i.e., spent halogenated solvents used in degreasing) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene		Yes	No
trichloroethylene	· · · ·	Yes	No
methylene chloride		Yes	No
1, 1, 1-trichloroethane		Yes	No
carbon tetrachloride		Yes	No
chlorinated fluorocarbons		Yes	No

2. Does the handler generate any of the following FOO2 constituents (i.e., spent halogenated solvents) as a result of being used in the process either in pure form or commercial grade?

tetrachloroethylene	Yes	No
trichloroethylene	Yes	No
methylene chloride	Yes	No
1,1,1-trichloroethane	Yes	No
chlorobenzene	Yes	No
trichlorofluoromethane	Yes	No
1,1,2 trichloro 1,2,2-trifluoroethane	Yes	No
ortho-dichlorobenzene	Yes	No
1,1,2-trichloroethane	Yes	No

3. Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

xylene	Yes	No
acetone	Yes	No
ethyl acetate	Yes	No
ethyl benzene	Yes	No
ethyl ether	Yes	No
methyl isobutyl ketone	Yes	No
n-butyl alcohol	Yes	No
cyclohexane	Yes	No
methanol	Yes	No
	Continuing Children	





Handler Name: ID Number: Inspector: Date:

515	and the star second interacts
	and the second second
	Comments

If the FOO3 wastestream has been mixed with a solid waste, does the resultant mixture exhibit the ignitability characteristic?

Yes No

Does the handler generate any of the following FOO4 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

cresols and cresylic acid nitrobenzene

Yes	No
Yes	No

5. Does the handler generate any of the following F005 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?

toluene	Yes	No
methyl ethyl ketone	Yes	No
Carbon disulfide	Yes	No
1 SODULANOL	Yes	No
pyridine	Yes	No
Denzene	Yes	No
2-ethoxyethanol	Yes	No
2-nitropropane	Yes	No
	A CARACTER STORE	

6. Are any of the constituents listed in _____Yes ____ the questions 1-5 used for their _____Yes ____ "solvent" properties — that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.

(a) Chemical carriers?

___Yes __ No

If the answer is yes, list the constituents.

(b) Degreasing/cleaning?

Yes No

No

If the answer is yes, list the constituents.





	Handler N ID Number Inspector Date:	ame :
(c) Diluents?	Yes No	Connents
If the answer is yes, list the o	onstituents.	
(d) Extractants?	YesNo	
If the answer is yes, list the $lpha$	onstituents.	
(e) Fabric scouring?	Yes No	
If the answer is yes, list the ∞	onstituents.	
f) Reaction and synthesis media?	Yes No	
f) Reaction and synthesis media? f the answer is yes, list the co	Yes No Instituents.	
f) Reaction and synthesis media? f the answer is yes, list the co	Yes No Instituents.	
f) Reaction and synthesis media? f the answer is yes, list the co If questions 1-6 led the inspectanswer question 7.	Yes No mstituents.	y be an F-solvent
f) Reaction and synthesis media? f the answer is yes, list the co If questions 1-6 led the inspec answer question 7. Are any of the above constituent solvents? A solvent is consider "spent" when it has been used and the longer used without being	Yes No mstituents.	y be an F-solvent
f) Reaction and synthesis media? f the answer is yes, list the co If questions 1-6 led the inspect answer question 7. Are any of the above constituents solvents? A solvent is considered "spent" when it has been used and to longer used without being regenerated, reclaimed, or other reprocessed.	Yes No mstituents. tor to believe the waste may s spent ed d is wise Yes No	y be an F-solvent
f) Reaction and synthesis media? f the answer is yes, list the co If questions 1-6 led the inspect answer question 7. Are any of the above constituents solvents? A solvent is considered "spent" when it has been used and no longer used without being regenerated, reclaimed, or other reprocessed.	Yes No mstituents. tor to believe the waste may s spent ed d is wise Yes No	y be an F-solvent

!.



0

Handler Name: ID Number: Inspector: Date:

B: _____

8. If the waste is a mixture of constituents as determined in questions 1-6, answer this to determine whether it is a "solvent mixture" covered by the listings.

Comments

If the wastestream is mixed and contains more than one of the FOOL-FOO5 constituents listed in questions 1-5 (by volume), give the concentration before use of all the constituents in the solvent mixture/blend. For example:

5% methylene chloride 2% trichloroethylene 25% 1,1,1-trichloroethane 68% mineral spirits 100%

If the wastestream is a mixture containing a total of 10% or more (by volume) of one or more of the FOO1, FOO2, FOO4, or FOO5 listed constituents before use, it is a listed waste.

With respect to the F003 solvent wastes, if, before use, the wastestream is mixed and contains only F003 constituents, ii is a listed waste. For example:

33% acetone 16% methanol 51% ethyl ether 100%

If the wastestream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50% xylene F003 12% TCE F001 38% mineral spirits 100%

If in light of the above, the handler appears to be generating FOOL-FOO5 hazardous wastes, refer this facility to the enforcement official for follow-up actions veryifying the use of solvents at the facility.



US Ecology, Inc. 9200 Shelbyville Road, Suite 300 P.O. Box 7246 Louisville, Kentucky 40207 502 426-7160



an American Ecology company

February 6, 1987

Dear Customer:

As was promised in the January 30th issue of the US Ecology Nuclear "Customer Service Bulletin," a copy of the new Richland, Washington facility license is enclosed for your review and compliance. You are encouraged to carefully review this somewhat lengthy document, specifically noting the following highlights of changes described in the "Bulletin:"

File

40

- * CONDITION 14 all waste must be packaged and transported in full compliance with the Resource Conservation and Recovery Act (RCRA) of 1976 and the Washington State Hazardous Waste Management Statutes of 1976.
- CONDITION 15 wooden outer containers prohibited after February 28, 1987.
- CONDITION 16 whenever required in the license, DOT 7A Type A containers must meet the revised usage restrictions.
- CONDITION 18 minimizing void spaces within stable waste packages to no greater than 15%.
- CONDITION 24 packaging procedures for corrosive waste liquids.
- CONDITION 31 packaging procedures for gaseous waste.
- CONDITION 32 stabilization guidelines for Class A ion exchange resins.
- CONDITION 33 shipments of both Class A and Class C radium and transuranics.
- CONDITION 35 Class A incinerator ash packaging.



Page #2

- CONDITION 36 packaging procedures for wastes containing oils greater than 10% by weight.
- CONDITION 37 packaging procedures for wastes containing chelating agents in excess of 1% by weight of the pretreated waste.
- * CONDITION 38 shipment procedures for neutron sources.
- * APENDICES C, D and F approved solidification media, stabilization media and sorbents.
- * APPENDIX E certain high integrity containers are now specifically adopted into the license.

If you have any questions after reviewing the new license, or if you would like additional copies of the January 30th "Bulletin," specifying the changes in more detail please call Arvil Crase, Mike Fraser, Gary Young, Mike Davis or Rob Rittenberg toll-free at 800-626-5334. In California call Tom Dias at our Pleasanton facility at 415-463-9280.

US Ecology Nuclear is grateful for the continued opportunity to service your LLRW disposal requirements.

Sincerely,

wil Grase

Arvil Crase Director of Marketing Services Nuclear

AC/pt

Encl.





Page 1 of 27 Pages

STATE OF WASHINGTON

RADIOACTIVE MATERIALS LICENSE

Pursuant to the Nuclear Energy and Radiation Control Act, RCW 70.98, and the Radiation Control Regulations, Title 402 WAC, and in reliance on statements and representations heretofore made by the licensee designated below, a license is hereby issued authorizing such licensee to transfer, receive, possess and use the radioactive material(s) designated below; and to use such radioactive materials for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules and regulations promulgated by the State Department of Social and Health Services.

Licensee 1. Name US Ecology, Inc. 9200 Shelbyville Road, Suite 300 P.O. Box 7246 Louisville, Kentucky 40207		- 3. License number WN-1019 entiret	-2 is renewed in its y to read as follows:	
		ite 30	4. Expiration date November 30, 1990	
		207	5. Reference number	A Martinette
6. (cle	Radioactive materials ment and mass number)	7. Ch	emical and/or physical form	8. Maximum quantity licensee may possess at any one time
Α.	Any radioactive material excluding source material and special nuclear material.	A.	Dry packaged radioactive waste except as authorized by this license.	A. 60,000 curies (2.22 x 10 ¹⁵ Bequere)
Β.	Source material.	В.	Dry packaged radioactive waste except as authorized by this license.	B. 36,000 kilograms.
C.	Any radioactive material excluding special nuclear material.	c	Any.	C. 0.1 curig (3.7 x 10 Bequerel)

CONDITIONS

- 9. Authorized use:
- A. & B. Radioactive waste may be received, transferred, stored, repackaged and disposed at a low-level radioactive waste burial facility. The maximum radioactivity and/or quantity of radioactive material indicated in item 8A and 8B applies only to above ground activity.
 - C. Check and calibration sources.



2 at 27 page

License Number WN-I019-2

- 10. The authorized place of use is a low-level waste burial facility located in southeast corner of Section 9, Township 12 North, Range 26E W.M., Benton County Washington, Route 4 - USDOE Hanford Reservation, Richland, Washington 99352, within the boundary of the land area described in Sublease Agreement with the state of Washington dated July 29, 1965, as amended. For the purposes of this license, the authorized place of use shall be referred to as the "facility".
- 11. Reference to the "Department" in this license shall mean the Department of Social and Health Services or successor agency.
- 12. The licensee shall notify the Department in writing within 30 days of the appointment of a new Facility Manager, Facility Assistant Manager and Corporate or Facility Radiological Control and Safety Officer, describing how the appointee meets or exceeds the minimum qualifications specified in the Facility Standards Manual.
- 13. Upon receipt of a shipment, the licensee shall furnish to the Department copies of all shipment manifests received. The licensee shall furnish to the Department, within 30 days of a specific written request, special reports consisting of selected information contained on shipment manifests. By the 10th of each month, the licensee shall submit a report totaling the volume and activity of the waste received during the previous month. In addition, two copies of a monthly facility receipt and burial activities report shall be submitted by the licensee, no later than the 15th day of the following month to the Department of Social and Health Services, Head, Radioactive Waste Management Section. The report shall include the following information for each shipment:
 - a. name and address of the generator(s); broker (if any), and shipper;
 - b. radionuclides and activity of each radionuclide in millicuries (total and by generator);
 - c. grams of special nuclear material as received under NRC License No. 16-19204-01 (total and by generator);
 - d. mass (in kilograms) of source material received (total and by generator);
 - e. class totals of volume and activity of Class A, B, and C waste entrenched (total and by generator); and

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

By.....

Date

RHF-14-2



License Number WN-1019-2

f. volume of packages disposed with radiation readings at the surface of the disposal container of:

 $\leq 50 \text{ mR/hr}$ $> 50 \text{ mR/hr} \leq 200 \text{ mR/hr}$ $> 200 \text{ mR/hr} \leq 1 \text{ R/hr}$ $> 1 \text{ R/hr} \leq 10 \text{ R/hr}$ $> 10 \text{ R/hr} \leq 100 \text{ R/hr}$ > 100 R/hr

RHF-14-2

and to the extent practicable:

g) type and physical form of the waste, and

h) chemical form of the waste and solidification/stabilization/sorption agent.

GENERAL PACKAGING CONDITIONS

- 14. All radioactive waste shall be packaged, loaded, received, and transported in accordance with all applicable U.S. Department of Transportation Regulations, U.S. Nuclear Regulatory Commision Regulations, state regulations, and the requirements of this license. Nothing in this license shall in any way relieve the licensee from full compliance with all applicable state and federal laws and regulations, including but not limited to the Resource Conservation and Recovery Act of 1976, as amended, and the State Hazardous Waste Management Statutes of 1976, as amended, and subsequently enacted regulations.
- 15. Unless specifically authorized by the Department, all radioactive waste shall be received and buried in closed containers. Cardboard, corrugated paper and fiberboard are prohibited burial containers. Unless specifically authorized by the Department, radioactive waste packaged in wooden outer containers shall not be received after February 28, 1987.
- 16. All metal containers shall be secured by an intact heavy duty closure device when presented for disposal. Closure devices of open-head metal drums having 55-gallons or greater capacity shall be secured by bolts having 5/8 inch or larger diameters. DOT 7A Type A containers shall be tested by the generator or shall meet the use restrictions contained in "DOT 7A Type A Certification Document," MLM 3245. Appendix A lists examples of those containers and restrictions.
- 17. Radioactive waste shall be packaged in such a manner that waste containers received at the facility do not show:

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

By.....

Date

DEHS 14-99A (3-81) -145



License Number WN-1019-2

a. Significant deformation,

BMR.14.7

- b. Loss or dispersal of contents,
- c. An increase in the external radiation levels as recorded on the manifest, within instrument tolerances, or
- d. Degradation due to rust or other chemical action which results in a loss of container integrity.
- 18. Void spaces within the radioactive waste and between the waste and its package shall be reduced to the maximum extent practicable. Unless specifically approved by the Department, void spaces in Class A stable, Class B and Class C waste packages shall be less than 15 percent of the total volume of the disposal package, provided the disposal package is not a high integrity container.
- 19. Waste shall not contain, or be capable of generating, toxic gases, vapors, or fumes during transportion, handling, or disposal.
- 20. No pyrophoric, hazardous, or chemically explosive materials or materials which could react violently with water or moisture or when subject to agitation shall be accepted for disposal.
- 21. Waste or packaging shall not contain any liquid except as authorized by Conditions 28 and 32 of this license.
- 22. The licensee shall not accept radioactive waste unless each waste package has been:
 - a. Classified in accordance with Appendix B of this license and "Low-Level Waste Licensing Branch Technical Position on Radioactive Waste Classification," issued May 1983 by the U.S. Nuclear Regulatory Commission.
 - b. Marked as either Class A stable, Class A unstable, Class B or Class C, as defined in Appendix B of this license and "Low-Level Waste Licensing Branch Technical Position on Radioactive Waste Classification," issued May 1983 by the U.S. Nuclear Regulatory Commission; and
 - c. Stabilized, when required by this license, in accordance with criteria contained in "Technical Position on Waste Forms", issued May 1983 by the U.S. Nuclear Regulatory Commission using only those stabilization media approved by the Department and listed in Appendix D to this license, or High Integrity Containers approved by the Department and listed in Appendix E to this license. Stability may also be achieved using engineered barriers in the disposal unit. Specific approval of the Department is required prior to construction of any engineered barrier.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES



License Number WN-1019-2

23. The classification marking required by Condition 22 is in addition to any marking or labeling required by US NRC or US DOT and shall consist of lettering 1/2 inch high or greater in a durable contrasting color to the background surrounding the lettering. The classification marking shall be visible on the same side as the radioactive marking or label and in close proximity (within six inches). Waste packages marked "Radioactive", "Limited Quantity" or "Radioactive LSA" need only one classification marking whereas waste packages labeled White I, Yellow II or Yellow III shall have classification markings in close proximity (within six inches) to each label.

SPECIFIC WASTE FORM REQUIREMENTS

- 24. Except as allowed under Conditions 28 and 32, untreated liquids and wet sludges are not allowed for disposal. Liquids shall be rendered noncorrosive (4< pH <11) prior to treatment. Acceptable treatments are stabilization, solidification, or sorption, depending on waste class. Wet sludges or slurries, such as evaporator bottoms, shall be noncorrosive and shall be treated by stabilization or solidification. Ion exchange media shall not be treated by sorption.</p>
- 25. Liquids treated by stabilization shall be processed in accordance with a process control program using an approved stabilization medium (see Appendix D). The resulting waste form shall contain no detectable free-standing liquid and shall meet the stability requirements of Condition 22. No detectable free-standing liquid is defined to be as little free standing and noncorrosive liquid as is reasonably achievable, but in no case shall the liquid exceed one percent of the volume of the waste when the waste is in a disposal container designed to ensure stability, or 0.5 percent of the volume of waste processed to a stable form.
- 26. Liquids treated by solidification shall be processed in accordance with a process control program using an approved solidification medium (see Appendix C). The resulting waste form shall contain no detectable free standing liquid. No detectable free standing liquid is defined to be as little liquid as is reasonably achievable but in no case shall it exceed more than 0.5 percent (by volume) of liquid per container.
- 27. Liquids treated by sorption may be received provided that:
 - a. A metal outer disposal container is used which meets DOT 7A performance specifications and heavy duty closure devices as required by Condition 16.

By

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

DEHS 14-99A (3-81) -145-

Date



Page 6 of 27 Pages

STATE OF WASHINGTON RADIOACTIVE MATERIALS LICENSE

MN-1019-2

- b. The metal container is lined with a minimum of 4 mil plastic liner, except as noted in Appendix F.
- c. The liquid is contained in enough sorbent material to sorb at least twice the volume of liquid contents.
- d. Only sorbents approved by the Department shall be used (see Appendix F).
- e. A quality control program is used which verifies that the above conditions are met.
- 28. Class A radioactive liquids in individual units or vials, not to exceed 50 milliliters per vial and used for clinical or laboratory testing, may be received provided that:
 - a. A metal outer disposal container is used which meets DOT 7A performance specification. (See Condition 16)
 - b. The metal disposal container is lined with a minimum of 4 mil plastic liner.
 - c. The individual units are layered in sufficient sorbent material to sorb twice the total volume of the liquid.
 - d. Only sorbents approved by the Department (see Appendix F) shall be used.
- 29. Waste containing biological (excluding animal carcasses, which are considered in Condition 30) pathogenic, or infectious material or equipment (e.g. syringes, test tubes, capillary tubes) used to handle such material, shall be treated to reduce, to the maximum extent practicable, the potential hazard from the nonradiological materials. The inner waste container shall be a metal container meeting either DOT 7A performance specifications (see Condition 16) or manufactured to DOT 17H specifications and shall be lined with a minimum 4 mil plastic liner which shall be sealed. The inner waste container shall be placed in an outer metal container meeting DOT 7A performance specifications with a heavy duty closure device (see Condition 16) and shall have a capacity at least 40 percent greater than the inner container. The void between inner container and outer container shall be completely filled by approved sorbent material and the outer container must be sealed. Only sorbents approved by the Department shall be allowed. (See Appendix F).

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

Date

ly.....



Liense Number WN-1019-2

- 30. Animal carcasses containing, or contained in, radioactive materials shall be packaged in accordance with the following requirements: the biological material shall be layered with absorbent and lime and placed in a metal container meeting either DOT 7A performance specification or manufactured to DOT 17H specifications, having a heavy duty closure device (see Condition 16). The inner container shall be sealed and placed in a metal container meeting DOT 7A performance specification with a heavy duty closure device, having a capacity at least 40 percent greater than the inner container. The void between the inner container and the outer container shall be completely filled by approved sorbent material and the outer container must be sealed. Only sorbents approved by the Department shall be used. (See Appendix F).
- 31. Waste in gaseous form must be packaged at a pressure that does not exceed 1.5 atmospheres at 20°C. Total activity shall not exceed 100 curies (3.7 x 1012 Bqs) per container. Class A gaseous waste shall be contained within U.S. DOT specification cylinders. Specific approval of the Department is required if the gaseous waste is Class B or C.
- 32. Class A ion exchange and filter media containing radionuclides with half-lives greater than five years, the total concentration of which is one microcurie $(3.7 \times 10^4 \text{ Bqs})$ per cubic centimeter or greater, shall meet the stability requirements of Condition 22 and shall contain no detectable free-standing liquid. No detectable free-standing liquid is defined to be as little liquid as reasonably achievable but in no case shall the liquid exceed one percent of the volume of the waste when the waste is in a disposal container designed to ensure stability, or 0.5 percent of the volume of waste processed to a stable form. Other Class A ion exchange and filter media which are classified as unstable shall contain not more liquid than 0.5 percent by volume of the waste.
- 33. Radioactive waste containing radium and transuranic radionuclides, as described in Appendix B, are acceptable provided that the radium and transuranic radionuclides are essentially evenly distributed within an homogenous waste form. The receipt and disposal of waste in which the radium or transuranic radionuclides are not evenly distributed (components or equipment primarily contaminated with radium or transuranic radionuclides) or radium or transuranics in excess of Class A limits requires the specific approval of the Department.
- 34. Radioactive consumer products, the use and disposal of which is exempt from licensing control, may be received without regard to concentration limits of Appendix B provided the entire unit is received and is packaged with sufficient sorbent material so as to preclude breakage and rupture of its contents.



Robel - State of the

STATE OF WASHINGTON RADIOACTIVE MATERIALS LICENSE

This condition allows the disposal of such consumer products as intact household or industrial smoke detector units containing Americium-241 foils, and radium or other radioactive materials incorporated into self-luminous devices and electron tubes. Only sorbents approved by the Department shall be used (see Appendix F).

- 35. Incinerator ash which is classified as Class A waste according to Condition 22 shall be solidified, granular or treated in such a manner as to be rendered nondispersible in air, exclusive of packaging.
- 36. Until alternative waste management techniques such as incineration or recycling become generally available, waste liquids which have a pre-treatment concentration of oil in excess of ten percent by weight, shall be treated by either solidification or stabilization. Dilution by solidification or stabilization media shall not be allowed in determining waste composition. Oil means an organic liquid which is immiscible in water, the disposal of which is not regulated under RCRA or the state hazardous waste laws.
- 37. Until alternative waste management techniques such as incineration or recycling become generally available, waste liquids, which have a pre-treatment concentration of chelating agents in excess of one percent by weight, shall be treated by either solidification or stabilization. Dilution by solidification or stabilization media shall not be allowed in determining waste composition. Chelating agent means amine polycarboxylic acids (e.g., EDTA, DTPA), hydroxy-carboxylic acids and polycarboxylic acids (e.g., citric acid, carbolic acid, and glucinic acid), the disposal of which is not regulated under RCRA or the state hazardous waste laws.
- 38. The licensee shall not accept for disposal any neutron source (e.g., polonium-201, americium-241, radium-226 in combination with beryllium or other target) unless the generator has notified the licensee of the intent to ship such source to the licensee's disposal facility. The notification shall consist of telephone and written notification to the Facility Manager prior to shipment. The notification shall indicate the isotope, activity, form of the source, a description of the packaging utilized, and anticipated date of arrival.

RECEIPT, ACCEPTANCE AND INSPECTION CONDITIONS

By.....

39. The licensee is exempt from the timely inspection requirements of WAC 402-24-125(2)(a) and (3)(a) provided the requirements of the Facility Standards Manual and Conditions 40 through 42 of this license are met.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

DEHS 14-99A (3-81) -145-

2HF-14-2



- 40. Waste shipments shall not be accepted at the facility unless accompanied by the following: (A single shipment shall consist of not more than one vehicle or one tractor with legal trailer(s) attached).
 - a. shipment manifest approved by the Department:
 - b. Washington State Patrol or Washington State Utilities and Transporation Commission vehicle inspection certificate, or a visible Washington State 90 day vehicle inspection seal.
 - c. Current certification Form RHF-31 properly executed by a representative of the shipper/generator of the waste, in accordance with requirements of Washington State Rules and Regulations for Radiation Protection, WAC 402-19-530(3).
 - d. Upon Departmental request, other permits or documentation required under state or federal law or regulation.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

147.14.2



BMP.14.7

· ***

STATE OF WASHINGTON RADIOACTIVE MATERIALS LICENSE

- 41. Waste shipments shall not be accepted by the facility unless the accompanying Form RHF-31 is stamped as received and initialed by an authorized representative of the Department. (This individual may be the licensee when designated by telephone notification and confirming letter from the Department.)
- 42. a. The licensee shall acknowledge receipt of the waste as soon as practicable, but no later than seven days following its acceptance for disposal by returning a signed copy, or equivalent documentation, of the shipment manifest to the shipper. The shipper to be notified by the licensee is the one last possessing the waste and transferring it to the licensee.
 - b. The licensee shall indicate on the returned copy of the shipment manifest, shipping papers, or equivalent documentation any discrepancy between noted waste descriptions listed on the manifest or papers and the waste materials received in the shipment.
 - c. The licensee shall notify the shipper and the Department when any shipment or part of a shipment has not arrived 60 days after the separate copy of the shipment manifest or shipping papers was received by the licensee.
 - d. The licensee shall maintain copies of completed shipment manifests including annotations of discrepancies found in accordance with Condition 42.b.

BURIAL OPERATIONS CONDITIONS

- 43. Unless otherwise specifically authorized by the Department, the licensee is not authorized to open any package containing radioactive material at the facility, except for the following:
 - a. For purposes of repairing, repackaging, or overpacking leaking containers or containers damaged in transport in the event the material is to be disposed of, or returned to the generator if required for the protection of the health and safety of the employees or the environment.
 - b. For purposes of inspection and waste confirmation in the presence of a Department inspector for compliance with Title 402 WAC, other applicable federal and state regulations, and conditions of this license; or
 - c. For purposes of returning outer shipping containers.

Date

DEHS 14-00A (3-01) -146

The licensee shall maintain a facility in which the above operations can be safely conducted.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

By.....



- 44. Wastes containing chelating agents in excess of 0.1 percent by weight shall be segregated from other wastes by placing them in disposal units which are sufficiently separated from disposal units for other waste classes so that any interaction between these wastes and other wastes will not affect the radionuclide mobility of the other wastes for 100 years. Until engineering studies provide justification otherwise, minimum separation distance shall be ten feet. In addition to segregation, the licensee shall record the three dimensional location of these wastes.
- 45. Wastes containing solidified oils shall be segregated from other wastes by placing them in disposal units which are sufficiently separated from disposal units for other classes of waste so that any interaction between these wastes and other wastes will not affect the radionuclide mobility of the other wastes for 100 years. Until engineering studies provide justification otherwise, minimum separation distance shall be ten feet. In addition to segregation, the licensee shall record the three dimensional location of wastes containing solidified oils.

SITE DESIGN AND CONSTRUCTION CONDITIONS

- 46. All burial trenches or disposal units shall be in a controlled area surrounded by a chain link fence, eight feet high, and topped with barbed wire.
- 47. Thirty days prior to commencement of construction of Trench 12, the licensee shall submit to the Department a detailed engineering plan for this trench in accordance with the provisions of the Facility Standards Manual.
- 48. The licensee shall submit, for approval by the Department prior to commencement of construction of any new disposal unit subsequent to Trench 12, a comprehensive site utilization and engineering plan encompassing proposed site operations for the expected lifetime of the facility. The plan shall discuss the reasoning for the choice of design and shall include detailed drawings and calculations sufficient to support the conclusions reached. Changes to the approved plan shall be submitted to the Department for review and approval.
- 49. The licensee shall conduct closure and stabilization operations in accordance with the approved site utilization and engineering plan required by Condition 48 and the facility closure and stabilization plan required by Condition 61 as each trench is filled and covered.
- 50. In addition to the requirements of Condition 49, the licensee shall design and construct interim disposal unit caps in accordance with the specifications contained in the Facility Standards Manual. Interim disposal unit caps shall be established within one year of completion of a disposal unit or as described in the comprehensive site engineering plan required by Condition 48.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

By.....

Date

DSHS 14-99A (3-81) -146-

RHF-14-2



- 51. The dimensions of burial trenches shall not exceed a width of 150 feet (46 meters), a depth of 45 feet (14 meters), or a length of 1000 feet (305 meters) without specific documented approval from the Department. Measurements shall be referenced to pre-1965 contours.
- 52. Until an agreement is secured with agencies controlling adjacent lands which meets the requirements of Condition 61(k) of this license, disposal units constructed after the effective date of this license shall be placed at least 100 feet away from the North, South and West subleasehold boundries. The set back distance for the East boundary shall be no less than 50 feet.
- 53. The licensee shall, within 90 days of filling each disposal unit, erect interim disposal unit monuments upon which the following information shall be displayed in a legible manner:
 - Total activity of radioactive material, in Curies, excluding source and special nuclear materials; total amount of source materials in kilograms, and total amount of special nuclear material in grams;
 - b. Trench number or disposal unit designation;
 - c. Date of opening and closing disposal unit; and
 - d. Volume of waste in the disposal unit.

The erection of interim monuments may be omitted if permanent monuments, required by Condition 60, are scheduled to be erected within six months of completion of the disposal unit.

STREAM OF THE ST

54. The licensee shall have its comprehensive site monitoring plan for ground water, air, soil, vegetation and direct radiation pathways operational by January 31, 1987. In addition, the licensee shall perform comprehensive pathway analyses to include air, soil, vegetation, fauna, and human impacts which shall be completed by October 31, 1987. Within 60 days of completion of the pathway analysis report, the licensee shall submit to the Department the licensee's evaluation of the report with respect to the environmental monitoring program including all modifications of the plan as may be supported by the pathway analysis report.

Bv

RHF-14-2

DSHS 14-99A (3-81) -145-

Date

License Number ... WN-1019-2.....

- 55. The licensee shall conduct an environmental monitoring program capable of detecting the potential contribution of radioactive material from the site to the environment. The program shall include collection of samples and analyses at frequencies specified in the Facility Standards Manual. The licensee shall coordinate sampling schedules with the Department to provide, when possible, duplicate samples on a prearranged frequency. A comprehensive annual report of the sample analyses, with statistical trend analyses and discussions of all anomalous results and actions taken, shall be forwarded to the Department by June 1 of each year. In addition, the licensee shall report immediately any environmental monitoring results in excess of action levels specified in the Standards Manual.
- 56. The licensee shall conduct an experimental monitoring program designed to determine the extent and modes of migration of disposed waste into the unsaturated zone, in accordance with procedures specifically approved by the Department. Annual reports shall be made to the Department and shall include a discussion of the results of the program.
- 57. The licensee shall submit a facility utilization report to the Department within three months of the issuance date of Amendment 17 to this license and by August 31 of each subsequent year. The report shall provide:
 - a. identification of each disposal unit and description of all waste emplaced during the previous calendar year. A three dimensional identification to describe the disposal location of each package of waste in excess of Class A concentrations and the disposal location of those wastes containing oils or chelates shall also be provided beginning with the effective date of this Amendment. Three dimensional identification shall be within 50 feet horizontally and within 10 feet in the vertical plane.
 - b. percent of utilization for each operating stable and unstable trench or disposal unit filled during the previous calendar year.
 - c. annual aerial photograph of the leasehold.
- 58. In addition to the annual report required by Condition 57, an historical report of operations shall be submitted to the Department within one year from the issuance date of Amendment 17 to this license which shall include:
 - a. Aerial and other photographs at the subleasehold which document the extent and type of disposal throughout the operational history of the facility.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

Date



E.M.F. HMS

STATE OF WASHINGTON RADIOACTIVE MATERIALS LICENSE

b.¹⁰ Earge scale topographic maps denoting all radiological monitoring/sampling denoting all radiological monitoring/sampling denotion of radioactive materials on the leasehold.

¹⁶c. ³⁹Volumes of waste disposed in each disposal unit and an accounting of the ³¹di total activity in Curies of byproduct material, kg of source material and

^{170Q3} grams of special nuclear material for each disposal unit. Major shipments ¹⁵ ¹⁰ or large activity sources within a disposal unit shall be noted with o

anomalous results and act.eldizeog tnetse ent of noitemroini fatobanent

By June 30, 1990, the licensee shall report to the Department the detailed location and description of all waste disposed, with the total trench content of each radionuclide listed. The chemical inventory of the single chemical trench should also be listed using data from original manifests. Nothing in this condition shall preclude the Department of Ecology from obtaining information needed to carry out its responsibilities under RCW 43.200.

By June 30, 1988, results and analyses of all environmental monitoring conducted by or for the licensee since operations began, including appropriate statistical assessments of possible trends, and discussion of any anomalous results and actions taken, if any.

59. As radioactive material buried may not be transferred by abandonment or otherwise, unless specifically authorized by the Department, the expiration date of this license applies only to the above ground activities and to the authority to bury radioactive material wastes at the site specified in Condition 10. The license continues in effect and the responsibility and authority for possession of buried radioactive material wastes continues until the Department finds that the plan established for preparation of the facility for transfer to another person or custodial agency has been satisfactorily implemented in a manner to reasonably assure protection of the public health and safety and the environment and the Department takes action to determinate the licensee's responsibility and authority under this license. All requirements for environmental monitoring, site inspection, maintenance and site security continue whether wastes are being buried or not.

60. All trenches or disposal units shall be conspicuously marked with permanent stable monuments at each end consistent with the approved site closure plan required by Condition 61. Permanent monuments shall be designed to stand erect, well above the grade of the final trench cover, and in a manner which will not allow them to be covered or obscured by drifting sand during the institutional control period. Inscriptions shall be made so as to endure and remain legible well beyond the institutional control period. The permanent monuments shall be inscribed with the following information:

SERVICES HTALASH ONA LAND HEALTH DEPARTMENT OF SOCIAL AND HEALTH SERVICES

BHF-14-2

the area Manuface . MN-1019-2



License Number ... WN-1019-2

- a. Total activity of radioactive material, in Curies, excluding source and special nuclear materials; total amount of source material in kilograms; and total amount of special nuclear material, in grams, in the trench;
- b. Trench number or other means of identifying the disposal unit.
- c. Date of opening and closing the disposal unit;
- d. Volume of waste in the disposal unit; and
- e. Coordinates of the stable and unstable disposal units, including disposal unit depth and depth of cover at closure.

This same information shall be reported to the Department of Social and Health Services and the Department of Ecology within 30 days of completion of each trench or disposal unit.

- 61. The licensee shall submit to the Department for approval an interim facility closure and stabilization plan within three months of completion of the pathway analysis required by Condition 54. The plan shall be reviewed and updated as necessary every four years thereafter. The facility closure and stabilization plan shall address how the licensee meets or plans to meet the following requirements:
 - a. Bury all waste in accordance with the requirements of the license.
 - b. Dismantle, decontaminate, as required, and dispose of all structures, equipment, and materials that are not to be transferred to the site custodian.
 - c. Document the arrangements and the status of the arrangements for orderly transfer of site control and for long term care by the government custodian. Also document the agreement, if any, of state or federal governments to participate in, or accomplish, and performance objective. Specific arrangements to assure availability of funds to complete the site closure and stabilization plan shall be documented.
 - d. Direct gamma radiation from buried wastes shall be essentially background at any accessible above-ground location, as determined by evaluation of environmental data from the licensee, U.S. Department of Energy and its contractors.

Bv.....

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

DBHS 14-99A (3-81) -145-

Date

RHF-14-2



- e. Demonstrate by measurement and model during operations and after site closure that concentrations of radioactive material which may be released to the general environment in ground water, surface water, air, soil, plants, or animals will not result in any member of the public receiving an annual dose equivalent to 25 millirems ($2.5 \times 10^{-4} \text{ Sv}$) to the whole body, 75 millirems ($7.5 \times 10^{-4} \text{ Sv}$) to the thyroid and 25 millirems ($2.5 \times 10^{-4} \text{ Sv}$) to any other organ of any member of the public.
- f. Render the site suitable for surface activities without resort to custodial care exceeding vegetation control, minor maintenance, and environmental monitoring. No active on-going maintenance shall be necessary. Final conditions at the site must be acceptable to the government custodian and compatible with its plan for the site.
- g. Demonstrate that all trench elevations are above water table levels taking into account the complete history of seasonable fluctuations.
- h. Eliminate the potential for erosion or loss of site or trench integrity due to factors such as ground water, surface water, wind, subsidence, and frost action. For example, an overall site surface water management system shall be established for draining rainwater and snowmelt away from the burial trenches. All slopes shall be sufficiently gentle to prevent slumping or gullying. The surface shall be stabilized to minimize erosion, settling, or slumping of caps.
- i. Demonstrate that permanent trench markers are in place, stable, and keyed to benchmarks. Identifying information shall be clearly and permanently marked as required by Condition 60 of this license.
- j. Compile and transfer to the Department complete records of site maintenance and stabilization activities, trench elevation and locations, trench inventories, and monitoring data for use during custodial care for unexpected corrective measures and data interpretation.
- k. Maintain a buffer zone to provide space to stabilize slopes, incorporate off-site surface water management features, assure that any future excavation on adjoining areas shall be evaluated as to its potential to compromise trench or site integrity, and provide working space for unexpected mitigating measures, if needed, in the future. The buffer zone may be within the subleasehold or, on adjacent land, provided written agreements are secured with persons owning or controlling adjacent lands which shall allow the licensee or custodial agency the required access and actions.

By

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

DSH8 14-99A (3-81) -146-

Date

RHF-14-2



STATE OF WASHINGTON RADIOACTIVE MATERIALS LICENSE

License Number ... WN-1019-2.....

- Provide a secure passive site security system (e.g., a fence) that requires minimum maintenance.
- m. Stabilize the site in a manner to minimize environmental monitoring requirements for the long-term custodial phase and develop a monitoring program based on the stabilization plan.
- n. Investigate the causes of any statistically significant levels of radioactive or hazardous materials in environmental samples taken during operation and stabilization. In particular, any evidence of unusual or unexpected rates or levels of radionuclide migration in or with the ground water shall be analyzed and corrective measures implemented.
- o. Eliminate the need for active water management measures, such as sump or trench pumping and treatment of water to assure that wastes are not leached by standing water in the trenches.
- p. Evaluate present and proposed activities on adjoining areas to determine their impact on the long-term performances of the site and take reasonable action to identify and minimize the effects.

A final facility closure and stabilization plan shall be submitted for state of Washington approval within 90 days following issuance by the Department of Ecology of the final closure and stabilization requirements. The final plan shall address how the licensee meets or plans to meet the requirements developed pursuant to 43.200.190.

- 62. Notwithstanding other requirements of this license or the sublease, one year prior to the anticipated transfer of the licensee's facility and buried radioactive waste to another person (including an agency of the state or federal government), the licensee shall submit a final version of the facility closure plan, including a schedule for implementation of all remaining plan elements prior to transfer, and a description of the mechanics of orderly transfer in coordination with the transferee.
- 63. Except as specifically provided by this license, the licensee shall possess and use radioactive material described in Items 6, 7, and 8 of this license in accordance with statements, representations, and procedures contained in the documents listed below. The Department's "Rules and Regulations for Radiation Protection", Title 402 WAC shall govern the licensee's statements in applications or letters, unless statements are more restrictive than the regulations. Any change to the documents listed below shall require Departmental approval in the form of an amendment to this license.
 - A. Application dated December 24, 1986, (supercedes application dated July 19, 1985).
 - B. Facility Standards Manual, Revision 0, January 13, 1987.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

Radiation Protection

Date January 21, 1987

HF-14-2



APPENDIX A

EXAMPLES* OF CONTAINERS MEETING 7A PERFORMANCE SPECIFICATION AND HAVING A HEAVY DUTY CLOSURE DEVICE

Spec. 6B Steel Drum (30 gallon)

- Spec. 6C Steel Drum (5 and 10 gallon)
- Spec. 6J Steel Drum (55 gallon)
- Spec. 42B Aluminum Drum (55 gallon)
- Spec. 17C Steel Drum (5 gallon)
- Spec. 17C Steel Drum (55 gallon)
- Spec. 17E Steel Drum (55 gallon)
- Spec. 17H Steel Drum (30 gallon)
- Spec. 17H Steel Drum (55 gallon) with 5/8" bolt closoure
- Spec. 7A Steel Box (Argonne National Laboratory's Steel Bin)
- Spec. 7A Steel Box (BCL-5 Shipping Container)
- Spec. 7A Steel Box (Type A Steel Box)
- Spec. 7A Steel Drum (Follansbee Drum-MS 24347-2)
- Spec. 7A Steel Drum (4 gallon)

*These are merely examples of containers. The waste generator must comply with all DOT requirements pertinent to the container's selection, use, handling and transportation.

By.....

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

Date

RHF-14-2



Appendix B

WASTE CLASSIFICATION TABLE

RADIONUCLIDES CONC	ENTRATION LI	IMITS IN CURIES/CUBIC METER*
Group 1 (short-lived)	Class A	Class B Class C
Total of all with half-life less than 5 years	て 700	NOTE 1
H-3	₹ 40	NOTE 1 with specific departmental approval
Co-60	て 700	NOTE 1
N1-63	र 3.5	て 70 て 700
Ni-63 in activated metal	₹ 35	₹ 700 ₹ 7000
Sr-90	て 0.04	マ 150 マ 7000
Cs-137	マ 1	₹ 44 ₹ 4600
Group 2 (long-lived)		
C-14	マ 0.8	τ 8
C-14 in activated metal	र 8	80
Ni-59 in activated metal	र 22	₹ 220
Nb-94 in activated metal	マ 0.02	₹ 0.2
Tc-99	र 0.3	र 3
1-129	て 0.008	0.08

By.....

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

Date



Page 20 of 27 Page

STATE OF WASHINGTON RADIOACTIVE MATERIALS LICENSE

Appendix B (Cont.)

WASTE CLASSIFICATION TABLE

RADIONUCLIDES CONCENTRATION LIMITS IN CURIES/CUBIC METER*

Group 2 (long-lived)

Class A Class B Class C

CONCENTRATION LIMITS IN NANOCURIES/GRAM

Alpha emitting Trans (excluding special m with half-life >5 yes	uranics < 10 uclear material) ars	₹ 100 with specific departmental approval
Radium	マ 10	₹ 100 with specific departmental approval
Curium-242	₹ 2,000	20,000 with specific departmental approval
이 다. 영양 방송은 일이 한다니 또 아니 밤 것 수 있나?		

*curies/cubic meter is equivalent to microcuries/cubic centimeter

NOTE 1: There are no limits established for these radionuclides in Class B or C wastes. Practical considerations such as the effects of external radiation and internal heat generation on transportation, handling, and disposal will limit the concentrations for these wastes. These wastes shall be Class B unless the concentrations of other nuclides in Table 2 determine the waste to be Class C independent of these nuclides.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

DSHS 14-99A (3-81) -145-

Date

BHF-14-2



Page 21 of 27 Pages

STATE OF WASHINGTON RADIOACTIVE MATERIALS LICENSE

License Number ... WN-1019-2.....

APPENDIX B (cont.)

- (1) Unless specifically restricted elsewhere in the license, the concentration of a radionuclide or radionuclide mixture may be averaged over the volume (or mass) of the waste and, if used, the solidification agent or matrix. The concentration of radionuclides in filters encapsulated with a solidification agent or matrix shall be averaged over the volume of the filter, not the solidification agent. The volume (mass) of packaging containers, liners or overpacks shall not be included in this calculation, nor shall the volume (mass) of the waste mixture be artificially increased by the addition of heavy, nondispersable solids or objects even if considered as waste. Further guidance is provided in "Low-Level Waste Licensing Branch Technical Position on Radioactive Waste Classification," May 1983, or successor documents issued by the U.S. Nuclear Regulatory Commission.
- (2) The waste is Class A if none of the listed radionuclides is present. Radium or Americium waste packaged in accordance with Condition 34 of this license shall be Class A unstable and the words "Condition 34" shall be noted on the manifest or other documentation accompanying the waste package.
- (3) There are no Class B values for the last eight radionuclides listed; their presence classifies the waste as either Class A or Class C according to their concentrations.
- (4) The waste class for mixtures of the listed radionuclides is determined by deriving for each radionuclide the ratio between its concentration in the mixture and its concentration limit in the table of this and the special nuclear materials license issued by the U.S. Nuclear Regulatory Commission and adding the resulting ratio values for each radionuclide group. All limits used in the calculations must be for the same waste class. The sum of the ratios for each radionuclide group must be equal to or less than 1.0 or the waste is the next higher classification than that used for the calculation.

If Class C limits are used in the calculation and the sum of ratios for either group exceeds 1.0, the waste is not acceptable for nearsurface disposal without prior written approval from the Department.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

DSHS 14-99A (3-81) -145

Date



APPENDIX B (cont.)

- (5) If radioactive waste contains a mixture of radionuclides, some of which are listed on Group 1, and some of which are listed on Group 2, classification shall be determined as follows:
 - (i) If the concentration of a nuclide listed in Group 2 does not exceed the Class A limit, the class shall be that determined by the concentration of nuclides listed in Group 1.
 - (ii) If the concentration of a nuclide listed in Group 2 exceeds the Class A limit, but does not exceed the Class C limit, the waste shall be Class C, provided the concentration of nuclides listed in Group 1 does not exceed the Class C value.
- (6) If concentrations for any single radionuclide exceed the Class C values in the table, the waste is not acceptable for near-surface disposal under this license.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

By.....

Date

BME.14.2


Page 23 of 27 Page

STATE OF WASHINGTON RADIOACTIVE MATERIALS LICENSE

APPENDIX C

APPROVED SOLIDIFICATION MEDIA

Only approved solidification media can be used. Approved solidification media are:

- 1) Aztech (General Electric)
- 2) Aquaset I and II
- 3) Bitumen* (Waste Chem and ATI)
- 4) Chem-Nuclear Cement
- 5) Concrete (Structural)
- 6) Delaware Custom Media
- 7) Dow Media
- 8) Envirostone
- 9) Hittman Grout
- 10) Petroset I and II
- 11) Safe T Set
- 12) Other solidification media and processes which have been approved by USNRC and/or the Department.
- *Note: For waste types that require solidification, both oxidized bitumen and straight distilled are acceptable.

Solidification means a resultant waste form which is a free standing solid and primarily relies upon a chemical reaction or encapsulation to contain the liquid. Approved stabilization media may also be used as solidification agents without conducting tests necessary to verify stability provided the resulting waste form is a free standing solid.

It is the responsibility of the person processing the waste into a solid form to adhere to a quality control program to verify the waste form is appropriate. If a material can also be used as a sorbent, the restrictions noted for its use in Appendix F shall apply to its use as a solidification agent.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

DEHS 14-80A (3-81) -145

PMP-14-2

y.....





License Number WN-1019-2

APPENDIX D

APPROVED STABILIZATION MEDIA

Only those stabilization media which have been evaluated or are in the process of being evaluated and are used with the stability guidance requirements of the U.S. Nuclear Regulatory Commission's Low-Level Licensing Branch, Technical Position on Waste Form or are specifically approved by the Department are considered acceptable stabilization media. Approved stabilization media are:

- 1) Aztech (General Electric)
- 2) Bitumen* (ATI and Waste Chem)
- 3) Chem-Nuclear Cement
- 4) Concrete**
- 5) Dow Media (Vinyl Ester Styrene)
- 6) Envirostone (U.S. Gypsum Cement)
- 7) LN Technologies Cement
- 8) Stock Equipment Cement
- 9) Westinghouse Hittman Cement
- Other stabilization media and processes which have been reviewed and approved by U.S. NRC and/or the Department as meeting waste form stability criteria.

*Note: Oxidized Bitumen only.

**Concrete, when used as an encapsulation medium around a small volume of radioactive material, e.g., a sealed source centered in a fifty-five gallon drum containing concrete, shall have a formulated compressive strength greater than or equal to 2500 psi.

By.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

DSHS 14-99A (3-81) -145-

Date





Licence Number ... WN-1019-2

Package

Appendix E

CERTIFICATES OF COMPLIANCE

C of C Number	Manufacturer	Identification Number
WN-HIC-01	Pacific Nuclear	DSHS-HIC-TMI-01
WN-HIC-02	Nuclear Packaging	DSHS-HIC-EA-50
WN-HIC-03	Chichibu Cement	DSHS-HIC-SFPIC 200L
WN-HIC-04	Chichibu Cement	DSHS-HIC-SFPIC 400L

Other High Integrity Containers which have been specifically approved by the Department.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES



APPENDIX F

Approved Sorbents

Only those absorbents listed below have been approved by the state of Washington, Department of Social and Health Services, Office of Radiation Protection (Department) for general use in packaging and/or processing radioactive liquids or with materials that may contain a quantity of liquid that requires absorbing.

Absorbency efficiencies and quantity of absorbent required vary. In all cases, it is the responsibility of the waste generator and/or packager to determine the efficiency and proper proportions of absorbent for liquids being absorbed. Note: Enough absorbent materials must be provided to absorb at least twice the volume of radioactive liquid contents.

Media

011

Water

A. Clay Materials

1.	Speedi Dri	Approved	Approved
2.	Hi Dri	Not Approved	Approved
3.	Florco	Approved	Approved
4.	Florco X	Not Approved	Approved
5.	Instant Dri	Not Approved	Approved
6.	Safe T Sorb	Not Approved	Approved
7.	Opalex	Approved	Approved

B. Diatomaceous Earths

1.	Superfine	Approved	Approved
2.	Floor Dry	Approved	Approved
3.	Celetom	Approved	Approved
4.	Safe N Dri	Approved	Approved
5.	Solid-A-Sorb	Approved	Approved

C. Perlite

1.	Chemsil 30	Not Approved	Approved
2.	Chemsil 50	Approved	Approved
3.	Chemsil 3030	Approved	Approved
4.	Dicaper1 HP200	Approved	Approved
5.	Dicaper1 HP500	Approved	Not Approved
		The second se	

By

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

DSHS 14-99A (3-81) -146-

Date



License Number WN-1019-2

APPENDIX F (Cont.)

Approved Sorbents

Media

011

Water

D. Others

Dicalite Dicasorb
 Petroset**
 Petroset II**
 Aquaset**
 Aquaset II**
 Safe T Set

Approved Approved*** Approved Not Approved Not Approved Not Approved Not Approved Approved*** Not Approved Approved Approved* Approved

*Not for use with pure water

**Note: The products Aquaset, Aquaset II, Petroset, and Petroset II are exempt from Condition 27(B). These products shall only be used without an inner 4 mil plastic liner. Additionally, these products when used in accordance with the manufacturer's procedures incorporate the requirement of enough absorbent material to absorb at least twice the volume of radioactive liquid content.

***Note: The product Petroset is primarily used in conjunction with Petroset II or Aquaset II when a mixture of water and oils are present and the oils are in excess of five percent of the waste volume. Use of Petroset requires power mixing equipment.

FOR THE STATE DEPARTMENT OF SOCIAL AND HEALTH SERVICES

Date



From DRMO 4-21-87



"DELIVER OUT.

CORRECTED COPY

PRIORITY

P 131700Z APR 87

FM DRMS BATTLE CREFK MI//D//

TO DRMR COLUMBUS OH//CD// DRMR OGDEN UT//OD// DRMR PAC CP H M SMITH HI//PD// DRMR DDMT MEMPHIS TN//MD// DRMR EUROPE LINDSEY AS GE//ED// AIG 4573

Sala Hauns"

UNCLAS DRMS-00

DELIVER DURING NORMAL DUTY HOURS. AIG 4573 TAKE AS INFO. SUBJECT: CONTAINERS AND ITEMS ACCOMPANIED BY INERT CERTIFICATE

A. DRMS-DD MSG 051715Z FEB 87, SAME SUBJ.
B. DRMS-DD MSG 192100Z FEB 87, SAME SUBJ.
C. DRMS-H 4160.3, VOLUME I, CHAPTER XVII, PARAGRAPH B3B.

1. REFERENCES PROVIDED INITIAL AND CLARIFYING GUIDANCE ON INITIAL PROCEDURES FOR CONTINUED PROCESSING OF SUBJECT PROPERTY. ALTHOUGH REFERENCES ADVISED THAT A SAMPLING PROCEDURE WAS TO BE DEVELOPED, A SAMPLING PROCEDURE WILL NOT, REPEAT, WILL NOT BE USED BY DRMOS.

2. UPON RECEIPT OF THIS MESSAGE, REFERENCES A AND B ARE RESCINDED EXCEPT FOR THE RCS REPORTING REQUIREMENT WHICH IS RESTATED IN PARAGRAPH 4 OF THIS MESSAGE. I HAVE INCLUDED YOUR DRMOS AS INFO ADDRESSEES OF THIS MESSAGE TO GIVE THEM A HEADS-UP ON THE REPORTING REQUIREMENTS. THE FOLLOWING DESCRIBES DRMO INVOLVEMENT IN REVIEWING TURN-INS OF SUBJECT PROPERTY.

A. INVENTORY ON HAND PRIDR TO 1 MAR 87. THIS INVENTORY IS CONSIDERED SUSPECT BECAUSE MILITARY SERVICES WERE STILL REVIEWING AND TIGHTENING INTERNAL PROCEDURES TO BE FOLLOWED WHEN INERT CERTIFICATION IS REQUIRED. DRMOS WILL ASK GENERATING ACTIVITY TO PROVIDE RECERTIFICATION OF EACH LOT (SEPARATE TURN-IN DOCUMENT). INERT CERTIFICATE WILL INCLUDE SIGNATURE AND CLEARLY READABLE NAME OF INSPECTOR AND ACTIVITY REPRESENTED. IF GENERATING ACTIVITY WILL NOT RECERTIFY A LOT, THEN THE ASSISTANCE OF THAT GENERATING ACTIVITY WILL BE OBTAINED IN REINSPECTING THE LOT AND CERTIFYING THE LOT INERT. AMOUNT OF REIMSPECTION (100 PERCENT OR LESS) WILL BE AS DETERMINED BY GENERATING ACTIVITY SO THAT GENERATING ACTIVITY CAN

DLVR: DRMD CAMP LFJEUNE NC(4) ... ACT

RTD:132-000/CDPIES:0004

924049/108 CSN:AUIA00222 1 DF 3 MATA0166 108/02:07Z

131700Z APR 87 DRMS BATTLE CR

RECERTIFY THE LOT INFRT. WHEN A GENERATING ACTIVITY WILL NOT COOPERATE, THE DRMO CHIEF WILL ATTEMPT RESOLUTION WITH THE ACTIVITY S INSTALLATION COMMANDER. IF DRMO CHIEF IS UNABLE TO RESOLVE THE REINSPECTION ISSUE, THE SITUATION WILL BE ELEVATED TO THE REGION. THE REGION WILL ATTEMPT RESOLUTION WITH THE INSTALLATION COMMANDER FIRST, THEN THE NEXT LEVEL OF COMMAND AS APPROPRIATE. IF REGION COMMANDER IS UNABLE TO RESOLVE THE SITUATION. PERTIMENT FACTS (NAME OF COMMANDERS CONTACTED, ETC.) WILL BE ELEVATED TO DRMS-O FOR RESOLUTION. DRMOS WILL IMPLEMENT THESE PROCEDURES (FOR INVENTORY ON HAND PRIOR TO 1 MAR 87) ON A PRIORITY BASIS. THESE PROCEDURES WILL BE APPLIED TO BOTH FIRED BRASS (SPENT CARTRIDGE CASES) AND CONTAINERS/BOXES. UPON COMPLETION OF THE CHECKS, NORMAL PROCESSING WILL CONTINUE.

B. PROPERTY RECEIVED ON AND AFTER 1 MAR 87.

(1) FIRED BRASS (SPENT CARTRIDGE CASES). FOR TURN-INS RECEIVED BETWEEN 1 MAR 87 AND RECEIPT OF THIS MESSAGE, DRMDS WILL REVIEW THE INERT CERTIFICATE AND DETERMINE IF A LEGIBLE AND PROPER CERTIFICATE WAS PROVIDED AS FEQUIRED BY EXISTING POLICY/PROCEDURE. IN ADDITION, THE DRMD WILL ENSURE THAT THE CERTIFICATE REFLECTS A SIGNATURE AND CLEARLY READABLE NAME OF INSPECTOR AND ACTIVITY REPRESENTED. NOTE: THIS CERTIFICATE REQUIREMENT WILL BE APPLIED TO ALL FUTURE TURN-INS. DRMO WILL CULL THROUGH OPEN CONTAINERS OF FIRED BRASS TO GIVE REASONABLE ASSURANCE THAT NO LIVE ROUNDS ARE THEREIN. CULLING DOES NOT MEAN THAT EACH AND EVERY BRASS CASE MUST BE REVIEWED. DRMD CHIEFS AND PERSONNEL WILL DETERMINE A PRUDENT AMOUNT OF CULLING BASED ON BEST JUDGEMENT AND TURN-IN HISTORY OF THE GENERATING ACTIVITY. NORMALLY, SEALED CONTAINERS WILL NOT BE OPENED FOR CULLING. THIS PROCESS, I.E. REVIEWING THE INERT CERTIFICATE AND CULLING OPEN CONTAINERS OF BRASS, WILL BE APPLIED TO FUTURE TURN-INS UPON DELIVERY OF PROPERTY TO DRMO/RECEIPT IN PLACE. ONCE THE DRMO HAS COMPLETED THIS CHECK AND NO LIVE AEDA IS DISCOVERED, NORMAL PROCESSING WILL CONTINUE.

(2) CONTAINERS AND BOXES. FOR TURN-INS RECEIVED BETWEEN 1 MAR 87 AND RECEIDT OF THIS MESSAGE, DRMOS WILL REVIEW THE INERT CERTIFICATE AS DESCRIBED FOR FIRED BRASS ABOVE. AGAIN, ENSURE THAT THE CERTIFICATE REFLECTS A SIGNATURE AND CLEARLY READABLE NAME OF INSPECTOR AND ACTIVITY REPRESENTED. FOR CONTAINERS AND BOXES NOT BANDED TO PALLETS, A RANDOM OPENING OF SOME LIDS WILL BE PERFORMED TO ASCERTAIN THAT NO LIVE AEDA IS THEREIN. DRMD CHIEFS AND PERSONNEL WILL DETERMINE A PRUDENT AMOUNT OF CHECKING BASED ON BEST JUDGEMENT AND TURN-IN HISTORY OF THE GENERATING ACTIVITY. NORMALLY, CONTAINERS AND BOXES WHICH ARE BANDED TO PALLETS WILL NOT BE UNBANDED. THIS PPOCESS, I.E. REVIEWING THE INERT CERTIFICATE AND RANDOM CHECK OF UNBANDED CONTAINERS/BOXES, WILL BE APPLIED TO FUTURE TURN-INS UPON DELIVERY OF PROPERTY TO DRMO/RECEIPT IN PLACE. ONCE THE DRMO HAS COMPLETED THIS CHECK AND NO LIVE AEDA IS DISCOVERED, NORMAL PROCESSING WILL CONTINUE.

C. WHEN PERFORMING THE ABOVE CHECKS AND LIVE OR SUSPECTED LIVE AEDA IS DISCOVERED, DPMO PERSONNEL WILL CEASE THEIR CHECK AND <u>ACTIVATE</u> EXISTING PROCEDURE (PEF C) FOR OBTAINING HOST/GENERATING ACTIVITY

924049/108 CSN:AUIA00222 2 DF 3 MATA0166 108/02:07Z

131700Z APR 87 DRMS BATTLE CR

EDD TEAM ASSISTANCE. SITREPS WILL BE MADE UNDER RCS NUMBER (REF C). THE LOT WILL BE INSPECTED AND RECERTIFIED BY EDD TEAM AND/OR GENERATING ACTIVITY. THIS NEW INERT CERTIFICATE MUST INCLUDE SIGNATURE AND CLEARLY READABLE NAME OF INSPECTOR AND ACTIVITY REPRESENTED.

3. THE FOREGOING PROCEDURES RESULT FROM DISCUSSIONS BETWEEN LTG RUSSO AND BG ARWOOD. THE PROCEDURES KEEP THE GENERATING ACTIVITY AS THE FOCAL POINT FOR CHECKING AND CERTIFYING PROPERTY AS INERT; AFTER ALL, THIS IS PART OF THEIR MISSION. ADDITIONAL INVOLVEMENT BY DRMO IS MINIMAL BUT CONSISTENT WITH GOOD MANAGEMENT PRACTICES. APPLICATION OF THE PROCEDURES BY THE DRMOS SHOULD CONTINUE TO LESSEN/ELIMINATE THE NUMBER OF CASES WHERE LIVE AEDA IS DELIVERED FROM THE DRMO.

4. THE MONTHLY REPORTING REQUIREMENT ALREADY ESTABLISHED UNDER RCS: DRMS-0-87-2(M) WILL CONTINUE FOR CHECKS MADE TO INVENTORY ON HAND PRIOR TO 1 MAR 87. REPORTING OF CHECKS MADE ON PROPERTY RECEIVED ON OR AFTER 1 MAR 87 IS NOT REPEAT NOT REQUIRED. ALL REPORTING BY DRMOS WILL BE TO DRMR. DRMRS WILL REPORT TO DRMS-O BY THE 10TH WORKDAY OF EACH MONTH. THE REPORT WILL INCLUDE THE RCS NUMBER. FOLLOWING DATA WILL BE REPORTED:

A. TOTAL UNINSPECTED BOXES/CONTAINERS ON HAND BEGINNING OF MONTH (INCLUDING CONTAINERS OF FIRED BRASS).

B. TOTAL NUMBER OF BOXES/CONTAINERS RECEIVED PRIOR TO 1 MAR 87 (INCLUD-ING CONTAINERS OF FIRED BRASS).

C. TOTAL BOXES/CONTAINERS INSPECTED (INCLUDING CONTAINERS OF FIRED BRASS).

D. HOURS EXPENDED TO INSPECT BOXES/CONTAINERS (INCLUDING CONTAINERS OF FIRED BRASS).

E. TOTAL INSPECTION COSTS INCURRED.

F. WHEN A DRMO COMPLETES CHECKING ALL INVENTORY ON HAND PRIOR TO 1 MAR 87, ADD THE FOLLOWING TO THE RCS REPORT: "INVENTORY ON HAND PRIOR TO 1 MAR 87 HAS BEEN CHECKED, THIS IS A FINAL REPORT FOR THIS DRMO". WHEN A REGION HAS RECEIVED A FINAL REPORT FROM EACH SUBORDINATE DRMO, A SIMILAR STATEMENT (CHANGING DRMO TO DRMR) WILL BE PLACED ON THE RCS REPORT TO DRMS-O.

BT

924049/108 CSN:AUIA00222 3 DF 3 MATA0166 108/02:07Z

131700Z APR 87 DRMS BATTLE CR

20 APR 1987 01 16



6240 NREAD 23 Apr 87

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

- To: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune
- Subj: HAZARDOUS WASTE (HW), USED SOLVENT ELIMINATION (USE) AND POLYCHLORINATED BIPHENYL (PCB) COMPLIANCE ASSESSMENTS; COMMENTS ON
- Ref: (a) EPA on-site inspection of 26-27 June 86 (b) BO 6240.5A
 - (c) EPA on-site inspection of 31 March 1 April 87

Encl: (1) Cmdr, Atlantic Division, NAVFACENGCOM ltr of 10 Mar 87

1. This memo provides comments on findings published in the enclosure as requested by Deputy Facilities Officer on March 24, 1987.

2. Regarding HW Management:

a. The enclosure essentially restates findings of reference (a). Ongoing efforts to upgrade the level of HW compliance have generated significant improvement.

b. Reference (b) revised HW responsibilities and procedures. In addition, reference (b) strengthened various internal controls. Properly implemented, reference (b) will address known HW deficiencies.

c. Two major commands, 2D FSSG & 2D MARDIV need to improve their internal controls and priority placed on HW management at the battalion level (particularly, 2D MARDIV).

d. Base Maintenance Officer has advised that funds for HW training were not incorporated into 1988 budget. This must be addressed or the HW program will seriously decline with the next turnover of personnel in the military organizations.

3. Regarding Used Solvent Elimination Program:

a. While the enclosure found Marine Corps Base in compliance, use of solvent rental by 2D FSSG and 2D MARDIV needs to be encouraged.

b. Contamination of waste oil by halogenated compounds (possibly from regulated solvents) continues to be a concern.

arta intega da sa na acarte an avito nantel tratte na que serie do se na constante acartema se acartema do se na fragencia de se la constante constante constante

64 02 1

William Pr

RADA BALLER

Ruber, HAR HUDE Ander High, HUDE HUDE HUDE HUDE HUDE AND AND A Der EDE LINGTERANTE HER HUDE HUDE HUDE ANDER ANTER HERE REPERENDE

et f. (a) Phy Does(); Lorpertype of 25-17 Jone 60 (24) (c) 30-5730/54 (c) 120/ carter technological and control of the second of the second of the second of the second

The start case attantic blateran wakenon to with the set

is the second second

Provide (1) referred and an intervention (1) actuaries
 Provide (1) referred (1) ref

(****: Dependence construct Su Talia SD assaus hour to intrové e terre l'entrois construct au originality constructed and an angle e to f the section level (for tional any or which to which the

Leve delines and information for an advise the first the start for the second of the second of the second of the start of the start of the second of the start of the start of the start of the second of the second

(1) approximate the second of the second

-506 maa 19



6240 NREAD 23 Apr 87

Subj: HAZARDOUS WASTE (HW), USED SOLVENT ELIMINATION (USE) AND POLYCHLORINATED BIPHENYL (PCB) COMPLIANCE ASSESSMENTS; COMMENTS ON

4. Polychlorinated Biphenyl Management

a. NREAD non-concurs with recommendations for bound record book. NREAD has initiated action to ensure that required records are maintained by the Environmental Chemistry and Microbiology Section.

b. All PCB vault doors and known PCB Transformers have been properly labeled/marked.

c. Non-contaminating PCB storage can be eliminated by future use of 55 gallon drums vice 85 gallon overpacks. PCB spill cleanup/decontamination procedures will be incorporated into comments on Ensafe Revision of SPCC Plan.

d. Removal Deadlines

(1) Transformers involving risk to food or feed, have been removed (i.e., cold storage, Bldg. 1300).

(2) BMO is initiating action (per Leon Mc Millan, BMO) to eliminate any network and radial PCB transformers. See paragraph 4(f) below.

e. Storage items marking has been accomplished. All containers have been properly labeled. BMO has been instructed on procedures.

f. Risk Assessment. BMO has initiated action to remove all known PCB transformers. Initiation of the project is imminent. BMO is currently developing a project to test (by contract) all transformers for PCB content. Testing results will enable analysis of total PCB situation.

J. I. WOOTEN

test of the second seco

 Joly arcelistic algority entropy for the formation of the second sec second sec

A b little b lit

A second s

A second of not the total of total of the total of total

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

25 March 87 Date

From: Director Do To: Dand Subj:

1.

See allocked

Julia

2 mode copies - on BAPil Taylat Prease remin this that a rejort 13 Doe. to ACISEACON IOAPII Dany -

ENCLOSURE (1)



ASSISTANT CHIEF OF STAFF, FACILITIES HEADQUARTERS, MARINE CORPS BASE

DATE 3-24-87

TO:

BASE MAINT O PUBLIC WORKS O

COMM-ELECT O

DIR, FAMILY HOUSING DIR, BACHELOR HOUSING BASE FIRE CHIEF

DIR., NAT. RESOURCES & ENV. AFFAIRS

ATTN: My Wonten

Attached is forwarded for into/action. Request you review for provide reporce indicating action False / plannel. Report report 10 Joil \$7 2. Please initial, or comment, and return all papers to this office.

Due date 24 april 87 per phone can with mon Eleton 10 april 87 Julie Usate

3. Your file copy.

Bullin by din

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

MCBCL 5216/21 (REV. 04-85)





DEPARTMENT OF THE NAVY

ATLANTOCIME CA NAMMANO CONTENESTE STUDIANO NAMMANO CONTENESTE STUDIANO 2477 - 1010 - 1010 TELEPHONE NO.

(804) 445-2935 5090 1143SG0

2 1 22 1.37

From: Commander, Atlantic Division, Naval Facilities Engineering Command To: Commanding General, Marine Corps Base, Camp Lejeune

- Subj: HAZARDOUS WASTE, USED SOLVENT ELIMINATION AND POLYCHLORINATED BIPHENYL COMPLIANCE ASSESSMENTS
- Ref: (a) OPNAVINST 5090.1
- Encl: (1) Hazardous Waste, Used Solvent Elimination and Polychlorinated Biphenyl Compliance Assessment; Marine Corps Base, Camp Lejeune and MCAS New River, North Carolina

1. In accordance with reference (a), a Hazardous Waste, Used Solvent Elimination and Polychlorinated Biphenyl compliance assessment was conducted at Marine Corps Base, Camp Lejeune on 29-31 October 1986.

2. Enclosure (1) is forwarded for your review and implementation as appropriate.

3. Our points of contact are as follows:

Hazardous Waste - Mr. Steve Olson Used Solvent Elimination - Mr. John Kresky PCB Compliance - Mr. John Kresky

4. Mr. Olson or Mr. Kresky may be reached at Commercial (804) 445-2935 or AUTOVON 565-2935.

J. R. BAILEY By direction

Copy to: CMC MCAS New River COMNAVFACENGCOM NEESA



HAZARDOUS WASTE, USED SOLVENT ELIMINATION AND POLYCHLORINATED BIPHENYL COMPLIANCE ASSESSMENT MARINE CORPS BASE, CAMP LEJEUNE AND MCAS NEW RIVER, NORTH CAROLINA

I. Executive Summary

A. Purpose

A Hazardous Waste (HW), Used Solvent Elimination (USE) and Polychlorinated Biphenyl (PCB) Compliance Assessment was conducted at the Marine Corps Base, Camp Lejeune and MCAS New River, North Carolina on 29-31 October 1986. The purpose of this effort was to assess activity compliance with applicable federal, state and local laws, regulations and Navy/Marine Corps directives concerning management of these programs. A one page summary of all three programs is provided in Attachment A.

B. Compliance with Regulations and Directives.

The hazardous waste management programs at both activities are partially in compliance with existing laws/regulations. The existing problems can be easily remedied by the activity as described, particularly if additional manpower is made available for training, program implementation and inspection/oversight.

The PCB management program has a few compliance problems which can be relatively easily corrected. The problem involved record keeping and proper marking of transformers.

The USE program is on track for implementation in accordance with CMC directives. Various commands have contracted with private (civilian) solvent vendors to provide solvent cleaning stations where needed.

C. Facility Representatives Contacted during the Assessment were:

Mr.	Danny Sharpe	Ecologist
Mr.	Manuel Martin	Physical Science Technician
Mr.	Julian Wooten	Director, Natural Resources and Environmental Affairs Division
Ms.	Mary Wheat	Hazardous Material Coordinator MCAS New River

II. Hazardous Waste Management

A compliance assessment was conducted of the HW management program on 29 - 31 October 1986. The assessment was conducted by Mr. Steve Olson, and included both a records inspection and an inspection of activity operations relating to HW management.

A summary with recommendations for the HW management program follows:

MARCORB Camp Lejeune

1. The State of North Carolina issued a HW Part B permit to MARCORB Camp Lejeune on 7 September 1984. After a review of the permit application, it appears to meet the absolute minimum standards for a Part B permit.



•

Recommendation: Continue operating under the permit as issued, however, be aware of the permits shortcomings and the need for update of particular areas of the permit (i.e., contingency plan, waste analysis plan etc.). When the permit is revised, the hazardous material/waste management plan (with detailed waste analysis plan) prepared by ENSAFE under Contract Number N62470-85-B-7979 will provide valuable information for updating the permit.

2. During the inspection of temporary (less than 90 day storage areas), containers were found open with bungs missing, unmarked as to their contents and missing accumulation start dates. In addition, several empty automotive storage batteries were found sitting upside down on bare soil.

Recommendation: Ensure that all HW collection containers are properly closed, labeled and marked with accumulation start dates. Do not store empty batteries upside down where residual battery acid can leak out and contaminate the ground.

3. Weekly container inspections at temporary storage areas have not been conducted and documented as required by 40CFR264.174.

Recommendation: Ensure that all required inspections are conducted and documented by responsible generating activities. An oversight inspection should be provided by the Natural Resources and Environmental Affairs (NREA) Division.

4. All personnel involved in HW management, particularly at the generator level, have not been properly trained to perform their assigned jobs as required by 40CFR264.16.

Recommendation: Revise the training plan and implement both initial and continuing training for all employees involved with HW management. Training should be properly documented and reviewed with each individual at least annually.

5. Manifests were missing a 24 hour emergency notification number and some were missing the required waste minimization statement.

Recommendation: Ensure that all manifests are completed to include these items.

6. The activity had not received return copies of all manifests within the alloted time frame.

Recommendation: Manifests must be closely monitored and accounted for as prescribed in 40CFR262.42. If signed manifest return copies are not received within 35 days of shipment, contact must be made with the transporter/TSDF to determine the status of the shipment. If the completed manifest is not then returned from the designated facility within 45 days of shipment, an exception report must be filed with the State of North Carolina and EPA Region IV.



7. Safety Kleen, Incorporated, has performed massive changes of manifest information on-site, i.e., name of generator, EPA identification number, etc., rather than initiating new original manifests at the Transportation Management Office (TMO).

Recommendation: To ensure that manifests remain legible, all manifests should be initiated specifically for the activity.

8. Waste solvents have been transported from MCAS New River to the TMO unmanifested and subsequently have had the manifest initiated at the TMO using MARCORB Camp Lejeune EPA identification number. MCAS New River wastes have also been manifested from New River using MARCORB Camp Lejeune EPA identification number.

Recommendation: Manifest all HW leaving base from a generator location using the correct EPA identification number.

9. While inspecting the Defense Reutilization and Marketing Office (DRMO) storage facility, an area of concern was discovered. This is the sale of excess government hazardous materials to civilian personnel who are not knowledgeable of what they are buying or the hazards associated with the materials they are buying.

Recommendation: Closely monitor DRMO hazardous property sales operations to reduce the potential of bad press coverage and potential liability of the base Commander. Concerns over hazardous property sales were raised to the Defense Reutilization and Marketing Service (DRMS) Battle Creek in Attachment B.

MCAS New River

1. See MARCORB Camp Lejeune recommendation Numbers 3, 4, 5, 7, 8 which also apply to MCAS New River.

2. The contingency plan does not list all temporary storage areas.

Recommendation: Update the contingency plan to ensure that all temporary HW storage areas are included.

3. There were several drums of "unknown" HW which require identification and disposal.

Recommendation: Work with MARCORB Camp Lejeune to identify the unknown HW and dispose of it through DRMO Camp Lejeune. Contract laboratory assistance is available through LANTNAVFACENGCOM on a reimbursable basis if needed.

III. Used Solvent Elimination (USE) Program

The USE program asessment was conducted on 30 October 1986.

A summary with recommendations for the USE program follows:



1. The activity generates greater than 400 gallons of used solvents per year and CMC requires full implementation of the USE program by 2 October 1986. MARCORB Camp Lejeune has contracted with a civilian solvent supplier/reclaimer. MCAS New River is using Safety Kleen, Incorporated at one location and they and other commands are presently exploring further use of these services at the activity.

IV. Polychlorinated Biphenyl Management

A PCB compliance assessment was conducted at MARCORB Camp Lejeune, North Carolina on 29-31 October 1986 to determine the status of compliance with federal regulations governing PCBs. The assessment was conducted by Mr. John Kresky. The effort included records inspection and on-site inspections of PCB transformers along with information gathering conversations with other base personnel.

A summary with recommendations for the PCB management program follows:

1. Record keeping is fragmented and difficult to assess. Inspections are recorded on forms kept loose leaf style rather than bound book style. It was not possible to determine the completeness of the records during the limited visitation time. It appears that all recent inspections and inventories can be accounted for. (40CFR761.80)

Recommendation: A complete set of records should be assembled and kept with a designated responsible party. Consideration should be given to maintaining records in bound record books. Photo copies could be made and distributed to the appropriate offices when necessary. The records should be accessible by more than one person to insure availability when needed.

NOTE: The annual CMC/OPNAV report does not completely fulfill the PCB record keeping requirements at 40CFR761.80.

2. Physical Condition -- Of the 15 transformers inspected, one was found to be leaking. This transformer was located adjacent Building AD-205, the Movie Theater. The leak appeared to be of recent origin. The leak was said to be repaired within 24 hours after discovery. All other transformers appeared to be in relatively good physical condition. There were no transformers that could be considered a risk to food and feed.

3. Several PCB vault doors not properly labeled. (40CFR761.40)

Recommendation: Provide proper labels for each door leading to a PCB transformer enclosure.

4. No SPCC for nonconforming PCB storage. (40CFR761.45)

Recommendation: Develop and implement a Spill Prevention Control and Countermeasure Plan.

5. No official plan for decontamination of PCB contaminated material. (40CFR761.79)



Recommendation: Use procedures outlined in NEESA 20.2-028B, PCB Program Management Guide and 40CFR761.79.

6. Marking -- A simple random sample of 15 transformers was taken from the last annual inventory sheets and an inspection was made of each transformer on 29-30 October 1986. Of the 15, all were marked but with an improper label.

Recommendation: Each PCB transformer be marked with the mark as in 40CFR761.45 as amended.

7. GENERAL - Several deadlines were recently set forth in 40CFR761.30. The most notable that required activity action included the following:

(a) As of 1 October 1985, the use and storage for reuse of PCB transformers that pose a risk to food or feed is prohibited.

(b) As of 1 October 1990, the use of network PCB transformers with secondary voltages equal to or greater than 480 volts in or near commercial buildings is prohibited.

(c) As of 1 October 1990, the use of radial PCB transformers and network transformers with secondary voltages below 480 volts in use in or near commercial buildings must be equipped with electrical protection to avoid transformer failure caused by high current faults.

Recommendation: MARCORB Camp Lejeune, North Carolina should prepare/submit the required projects for meeting these deadlines/requirements. Pollution Abatement (P/A) funding can be requested, but current funding levels are not_adequate to timely meet these compliance requirements.

A summary inspection assessment is provided as Table 1.

8. Storage items not properly marked (761:65).

Recommendation: Properly mark transformers with the date taken out of service.

9. No hydraulic systems are known to contain PCBs.

10. Updated transformer risk assessments should be prepared at MARCORB Camp Lejeune, in accordance with recent CNO directions. In accordance with CNO letters dated 18 October 1985 and 26 June 1986, it is recommended that risk assessment models be used to determine a replacement priority list for funding. Based upon the risk assessment, a pollution abatement project should be developed for transformer replacement. The following transformers are not technically in violation, but considered high risks:



(a) Camp Lejeune High School - Since the PCB transformer is located inside the building, a transformer fire would totally disable this facility. A fire in a transformer when school was in session would become a castastrophe of extraordinary proportions.

Recommnedation: Pursue available avenues of remediation for retrofit and/or relocation.

A summary inspection assessment is provided as Table 1.

TRANSFORMERS INSPECTED AT MARINE CORPS BASE, CAMP LEJEUNE, NORTH CAROLINA

Serial Number	Building	Comments
110065B	CLHS	Need Mark on both vault doors (1) (2)
3160815	Hl	(1)
3161515	Hl	(1)
3380120	H1	(1)
4161514	H1	(1)
5538054	AS3502	(1)
5538055	AS3504	(1)
6740378	AS205	Small Leak, (Needs Remediation (1) (2
8036378	B900	Need mark on Vault Door (1)
8036379	B901	(1)
8036380	B901 *	(1)
5854205	HP460	(1)
PAT1046-01	AS320	(1)
PCV0804-01	AS4020	(1)
RFK0874	HP2	(1)
TAV2471-01	FC420 _	(1)

Marking not in accordance with 49 CFR761.45, "Marking Formats"
 "Commercial" Locations (EPA requires removal by 1990)





GENERAL INFORMATION

ITLE MAR	CORB Camp Lejeune
Jacksony	ville. North Carolina
_CMC	
NAVFACENGO	COM
SURVEY:	29-31 Oct 86
	ITLE: MAR Jacksony CMC NAVFACENGO SURVEY:

(DAY/MO/YR) REPORT: _______ March 1987 LAST REPORT: ______ None

REGULATORY STATUS:		G,	S			
(G, T, S, D, Tr, SQ, NR)				P. Same	1.	18 2 2
ACTIVITY TYPE	OP				1.00	
PERMIT "A" OR "B":	В			and the state		

HW COMPLIANCE

ō	ANALYSIS: DEF	
F	ACCUMULATION:	DEF
E	PRE-TRANSPORT:	DEF
	MANIFEST: DEF	
GE	RECORDS & REPOI	RTS:

TRANSPORTER: __DEF

SECURITY: __Y

INSPECTION: __DEF

TRAINING: __DEF

PREPAREDNESS/PREVENTION: __Y

CONTINGENCY: __DEF

GW MONITORING: _NR

GW MONITORING: _NR

CLOSURE, POST-CLOSURE: __Y

MISCELLANEOUS: __N/A

PCB

RECORDS:	DEF
INVENTORY:	1
INSPECTIONS:	Y
ANNUAL REPOR	ит:
MARKING:	DEF
TRANSFORMER	MGMT: Y
STORAGE: DE	F
CONTAINERS: _	Y
DISPOSAL:	
DECONTAMINAT	TION:
USE PRO	GRAM
OVER OR UNDER	R 400g/YR:
PROPER DISPOS	SAL:
USE PROGRAM:	
PROGRAM MGM	IT: <u>Y</u>
INVENTORY: _Y	
OPTIONS EVALU	ATED:
IMPLEMENTED:	Y

KEY

Y - Y	ES, COMPLETE COMPLIANCE
DEF - D	EFICIENCY, MINOR PROBLEMS
UNK - L	INCLEAR
T - T	REATMENT
S - S	TORAGE
D - C	DISPOSAL
SQ - 5	MALL-QUANTITY GENERATOR
G - 6	ENERATOR
NR - N	IOT REGULATED
A - P	ARTA
B - P	ART B



6240 NREAD 17 Apr 87

From: Commanding General, Marine Corps Base, Camp Lejeune To: Commandant of the Marine Corps (Code LFL) Commander, Atlantic Division, Naval Facilites Engineering Command, Norfolk, Virginia (Code 114)

Subj: MILITARY MUNITIONS/RCRA

Encl: (1) EPA memo of 8 Apr 87

1. The enclosure is provided for your review and opinion. Mr. Dave Ellison, EPA Region IV, Atlanta, Georgia asked questions about military munitions disposal procedures aboard base during his RCRA program inspection of 31 March - 1 April 1987 and indicated the issue would be addressed in his report.

 If additional information is desired, Mr. Danny Sharpe, Ecologist, is the base point of contact.

> JULIAN I. WOOTEN By direction

Blind copy to: AC/S Fac


ROUTING	AND TRANSMITTAL	Date	4/8/	187
TO: (Name, office s	ymbol, room number,		Initials	Date
Dunume, reen			-	1.2.2.3
1. Julio	un Wooten	10.000	10000	1. A. M.
			Se Maria	•
2		C. Carlos		
1	2 12 14 14 14 14 14 14			
.		1999 A. 1995		1.1.1.1
				19. 1. 1987
•				1.30
		1 1.	1	
Action	File	No	e and Ken	um
Approval	Approval For Clearance Per Conversi			
XAs Requested	As Requested For Correction Pre			
Circulate	Circulate For Your Information Se			
Comment	Investigate	Signature		
Coordination	Justify			and the second second

REMARKS

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

Any questions let me know

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

FROM: (Hame, e.e. starter a	
Dave Ellison, USEPA	04 347-7603

5041-102

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

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





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

DEC 0 4 1954

30 NOV 1984

AIR & HATTER MATERIALS In OFFICEOF BOLID WASTE AND EMERGI REPONSE

MEMORANDUM

- shuff Shit i Classification of Small Arms Ammunition SUBJECT: With Respect to Reactivity
 - John H. Skinner, Director FROM: Office of Solid Waste (WH-562)
 - David Wagoner, Director TO: Air & Waste Management Division Region VIII

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

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

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SUBJECT Tocele Army Depot

A 1984

CATE JUN

Matthew A. Straus, Acting Chief 71/att waste Identification Branch, (WH-562B)

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

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

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

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

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





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

OCT 3 1985

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

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

Dear Mt. Achafer:

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

Military Munitions Subject to RCRA

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

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



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

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

RCRA Applicability to DoD

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

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



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

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

Sincerely yours, Jack W. McGraw Deputy Assistant Administrator

Enclosure



6240 NREAD

17 Apr 1987

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

Staff Judge Advocate, Marine Corps Base, Camp Lejeune Assistant Chief of Staff, Training and Operations, Marine Corps Base, Camp Lejeune

Via: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune MILITARY MUNITION/RCRA

Encl: (1) EPA memo of 8 Apr 1987

1. The enclosure is provided for your review and opinion. Mr. Dave Ellison, EPA, Region IV, Atlanta, Georgia, asked questions about military munition disposal procedures aboard base during his RCRA program inspection of 31 March - 1 April 1987 and indicated the issue would be addressed in his report.

2. If additional information is desired, Mr. Danny Sharpe, Ecologist, is the NREA point of contact.

JULIAN I. WOOTEN

Life of the state of the state

itic Juere Mycoores, facing Core Link, "dam absjoune Scotatent Chief of State Strainite on Opena Lone (Brithe Corro Origa, Costo Legane

addielat (bidirol Stall) Fadilities, Anthio Corns Bass, Same Falenta Ministar (definie)/rome

 The colloades is provided of our powies and annulats of bays lifeon observe is provided of our powies and annulats of bays lifeons away region if Arl no. Coursis tarked thetions about military remation deresal prededures about have further his relative the least would be although a 1 (2011) and indication the least would be although a 1 (2011) and

MATCON INCLUDE

ROUTING AND	TRANSMITTAL S	Date	4/8	187	
TO: (Name, office symb building, Agency/P	ol, room number, ost)		Initials	Date	
. Julian	Wooten		- 5	a sant	
2				•	
8.					
Action	File	Note	and Retu	m	
Approval	For Clearance	Per	Conversation		
XAs Requested	epare Reply				
Circulate For Your Information See			See Me		
Comment	Signature				
Coordination	Justify				

Attached is the quidance on

open burning and detonation of waste explosives.

Any questions let me know

REMARK

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

FROM: (Name, org. symbol, Agency/Post)			Room NoBldg.		
Dave	Ellison, L	SEPA	Phone No. FTS-257 (404) 347-7603		
5041–102 *U	.S.G.P.O.: 1983 _421-529/320	OPTIONAL Prescribed by FPMR (41 CFR	FORM 41 (Rev. 7-76) GSA 0 101-11.206		





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

DEC 0 4 1954

30 NOV 1984

AIR & HATE STOR MATERIALS I OFFICEOF BOLID WASTE AND EMERGE BFEPONEF

MEMORANDUM

- shuff. Ship ai Classification of Small Arms Ammunition SUBJECT: With Respect to Reactivity
 - John H. Skinner, Director FROM: Office of Solid Waste (WH-562)
 - David Wagoner, Director TO: Air & Waste Management Division Region VIII

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

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

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

SUBJECT Tocele Army Depot

4 1984

, PATE , JUN

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

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

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

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

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

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





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

OCT 3 1985

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

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

Dear Mr. Achafer:

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

Military Munitions Subject to RCRA

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

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



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

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

RCRA Applicability to DoD

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

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



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

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

Sincerely yours, W. McGraw Jack Deputy Assistant Administrator

Enclosure



6241/3 NREAD(L) 17 Apr 87

- From: Director, Natural Resources and Environmental Affairs Division, Marine Corps Base, Camp Lejeune To: Base Maintenance Officer, Marine Corps Base, Camp Lejeune
- Subj: TRANSFORMER OIL DISPOSAL; POLYCHLORINATED BIPHENYL (PCB) ANALYSIS RESULTS
- Ref: (a) BO 6240.5
- Encl: (1) IEA Report No. 304-12 dtd 7 Apr 1987 (2) Transformer Oil Sample List

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

2. Sample Number 1687 refers to a lathe, Plant Account Number 67001-179507 that is waiting turn-in to DRMO.

3. The results indicate that five of the transformers and one of the barrels stored at Lot 140 have over 500 parts per million (ppm) PCB's and are "PCB Transformers." Two of the transformers and one of the barrels had 50 to 499 ppm of PCB's which requires management as "PCB contaminated transformers." These seven transformers and two barrels should be turned in to DRMO and stored in the PCB storage building at lot 140.

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

JULIAN I. WOOTEN

Copy to: DRMO (w/o encls) laria stroo, d' Viste a strees a l'avit na cai li fra naciai stroo, d'arte corros Beac de sect toto combut amando biser, verse morros statico femano toto combut amando biser, verse morros statico femano

A set Margarithe in

ARDINE DATE: FRANK

1.24) and 1.12 and 0.4 and 0.4

// Addition of the second second

nessen mussa kiste dinna synakti kisi takan sinte Senta senti seki takan 1 metali seki takan 1 metali seki

the District of Scherolds and an entropy of the Scherolds of Scherolds and the Scherolds of Scherolds of Scherolds

· BUCH CONTRACTOR

April 7, 1987 Reference: IEA Report No. 304-12 Page 1

	Aroclor 1242 mg/Kg	Aroclor 1248 mg/Kg	Aroclor 1254 mg/Kg	Aroclor 1260 ` mg/Kg	Total Aroclors mg/Kg
1697					<1.0
1699	4.6			3.5	8.1
1600	4.0			3.4	7.9
1600	4.3				<1.0
1690					<1.0
1602	And the second				<1.0
1692				340	340
1693				700,000	700,000
1694				700,000	<1.0
1695					(1.0
1696					(1.0
1697					(1.0
1698					(1.0
1699					(1.0
1700				720 000	720.000
1701				/30,000	/30,000
1702	見たり、「	and a state		670,000	670,000
1704					<1.0
1705		**********			<1.0
1706				Mary Carl	<1.0
1707					<1.0
1709					<1.0
1710			la de la constante de la const La constante de la constante de		<1.0
1711			•	5.4	5.4
1712					<1.0
1713					<1.0
1714					<1.0
1715				33	33
1716				1.9	1.9
1718					<1.0
1719				5.4	5.4
1720	•			5.1	5.1



April 7, 1987 Reference: IEA Report No. 304-12 Page 2

	Aroclor 1242 <u>mg/Kg</u>	Aroclor 1248 <u>mg/Kg</u>	Aroclor 1254 <u>mg/Kg</u>	Aroclor 1260 mg/Kg	Total Aroclors <u>mg/Kg</u>
1721	Carl Andrews				<1.0
1722			· · · · · · · · · · · · · · · · · · ·	1.4	1.4
1723			Carlo Star		<1.0
1724				2.3	2.3
1725	Les Charles and Con				<1.0-
1726			-		<1.0
1727		-		27	27
1728				170	170
1729				1200	1200
1730					<1.0
1731					<1.0
1732				180	180
1733					<1.0
1734					<1.0
1735				640	640
1736				3.1	3.1
1737		10	8.0		18
1738				8.0	8.0
1739					<1.0
1740					<1.0
1741					<1.0
1742				4.1	4.1
1743					<1.0
1744					<1.0
1745					<1.0
1746					<1.0
1747					<1.0
1748					<1.0
1749					<1.0
1750				310,000	310,000
1751					<1.0



TRANSFORMER OIL SAMPLES

SAMPLE NUMBER	SERIAL NUMBER	BRAND	KVA	CAPACITY	SAMPLER	DATE
1638	SARRELS				Beh	25 TEB 87
1689	K					1
1690						
1691						
1692						2 13. 20 38 34 18 19 19 19 19 19 19
1693			2.2			
1694						1 and
1695						
1696						and the second
1697						
1698		1	they the			
1699						
1700	B. NERELIS					
1701	6368513	W!	75	3) GALWAS		
1702	6368512	W	75	30	1.	I,
1703	3160915	W	00	43 Em	74(5)	103 (11
1704		W.	15			
1705	1314122	Lm	15			
1706	747J092002	MCGIAN IEDISON	37.5	·		
1707	851009081	RTIE.	190			
1708	851127342	RTF	25	EMPTY		1708
1709	78 NI5 40803	DOWZER	50			
1710	78 01540501	11	50			

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



TRANSFORMER OIL SAMPLES

SAMPLE NUMBER	SERIAL NUMBER	BRAND	KVA	CAPACITY	SAMPLER		DATE
1711	5153020	W	37.5		Bet	-	25 FEB 87
1712	78 DI540804	DOWZIER	50				
1713	83A441041	W	25		1000	1	
1714	7454003003	ME	10				
1715	3115172	W	7.5				
1716	2510513	AC	5	Section 1912			
1717	N899919	DS	25	EMPTY		17 17	
1718	30/46/2	LM	15				art de .
1719	6427913	W	25	Argenter and			
1720	6038161	W	5				
1721	394797474AA	GE	25		Contractor of		a ser y al anti-
1722	E7212N15CA1	W	15	States			
1723	62AJ3954	W	15				
1724	M1785414CNA	GR	15				
1725	42AB5884	W	15-		i		et al anti-serie da anti-
1726	12920599	FS()	25	Ser and			
1727	2510468	AC .	5				
1728	B383323	GIE	15				e Ale
1729	B385343	GE	15		and the second	-	in any the
1730	851309079	RTE	100			-	
1731	M331477YFRA	GE	50	and a Spannerson			
1732	B370172A	GE	15	a Anna Sta	of Casher W		
1733	62494	T	50	ten sone Sone of prophetic transformer Sone of the sone of the son		Ŷ	V

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

ME - MCGRAW-EDISON


TRANSFORMER OIL SAMPLES

SAMPLE NUMBER	SERIAL NUMBER	BRAND	KVA	CAPACITY	SAMPLER	DATE
1734	12920600	FSCO	25	e de la composita de la compos En la composita de la composita	Betz.	25 FEB 8
1735	6607432	GE	30		-1	APT 2
1736	62635	TRANSFOLK	50		•	
1737	71AG11783	62	15			
1738	3527968	W	10			
1739	73022196	WAGNER	371 5			
1740	155833	5	50			
1741	LB27712YDLA	GE	75			
1742	8378939032	N	100			
1743	8335939018	W	100			
1744	M172098 YCNA	GE	167			1
1745	8336939012	W	75	and the second		
1746	83JE937083	W	75			
1747	83JE937105	'W	75			1. 76
1748	8312938027	W	75	A		State Barrie
1749	83JE937047	W	75	hanne an	1.	and the second
1750	H258738-68P	GE.	112.5	是外国		
1751	19E9792.59	W	225		Y	4
1752	NO MUMBER	AT AIRS	TATION	ana di anina dia 1 Manjara di Kabuda	BETZ	7 APr 87
1753				1. 1. A.		
1754						
1755		alian da la sua. A sua sua sua sua		gun transporter de la seconda de la secon Seconda de la seconda de la		and the second second
1754			and the second sec	an an ann ann an an ann an an an an an a	a ante e transferencia ante e transferencia	

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



6240 NREAD 13 Apr 87

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

Subj: TRAINING FOR HAZARDOUS MATERIAL DISPOSAL OFFICERS

Ref: (a) BO 6240.5A

Encl: (1) HMDO's for MCB

1. In accordance with the reference, a Hazardous Waste training program will be held for primary and alternate Hazardous Material Disposal Officer's (HMDO's), on 4 May 1987. The session will be from 0900-1100 hours in the Civilian Training Classroom, Building 1003, Hadnot Point area. This training is for those HMDO's listed in enclosure (1).

2. Point of contact is Mr. Sammy Gwynn, Natural Resources and Environmental Affairs Division, extension 2195.

> J. I. WOOTEN By direction

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



1 - p

NAME OF ORGANIZATION	HAZARDOUS MATERIAL PRIMARY	DISPOSAL OFFICER ALTERNATE Gleneé Smith 5003/2083 1103 lstLt G L McNutt 7528/7233	
Natural Resources & Environmental Affairs Division	Sammy Gwynn Phone: 5003/2083 Bldg: 1103		
Marine Corps Engineer School	Maj Ferral Phone: 7570/7275 Bldg:		
Rifle Range Detachment	lstLt O'Hara Phone: 7510 Bldg: ,	GySgt J V Adams 7510	
Field Medical Service School	Lt C W Hansen III Phone: 0826/0915 Bldg:	HMl C H Schroeder 0742/0892	
Marine Corps Service Support Schools	lstLt R D Rule Phone: 0973/0839 Bldg: Ml31	MGSgt Beckley 0710/0738 M119	
Reserve Support Unit	Capt M J Stroff Phone: 3144/1790 Bldg:	GySgt Filipczuk 3144/1790	
Infantry Training School	WO F L Cote Phone: 0378 Bldg:	•GySgt Gladden 0200	
Support Battalion	MSgt D S Keifer Phone: 5247 Bldg: 1011	Sgt Amrine 5247 1011	

ENCLOSURE (1)



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

DATE: 10 Apr 1987 ENCLOSURE (1)





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

IN REPLY REFER TO: 6240 NREAD 13 Apr 87

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

Subj: TRAINING FOR HAZARDOUS MATERIAL DISPOSAL OFFICERS

Ref: (a) BO 6240.5A

Encl: (1) HMDO's for MCB

1. In accordance with the reference, a Hazardous Waste training program will be held for primary and alternate Hazardous Material Disposal Officer's (HMDO's), on 4 May 1987. The session will be from 0900-1100 hours in the Civilian Training Classroom, Building 1003, Hadnot Point area. This training is for those HMDO's listed in enclosure (1).

2. Point of contact is Mr. Sammy Gwynn, Natural Resources and Environmental Affairs Division, extension 2195.

de Wool

J. I. WOOTEN By direction

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



NAME OF ORGANIZATION	HAZARDOUS MATERIAL PRIMARY	DISPOSAL OFFICER ALTERNATE
Natural Resources & Environmental Affairs Division	Sammy Gwynn Phone: 5003/2083 Bldg: 1103	Gleneé Smith 5003/2083 1103
Marine Corps Engineer School	Maj Ferral Phone: 7570/7275 Bldg:	lstLt G L McNutt 7528/7233
Rifle Range Detachment	lstLt O'Hara Phone: 7510 Bldg:	GySgt J V Adams 7510
Field Medical Service School	Lt C W Hansen III Phone: 0826/0915 Bldg:	HMl C H Schroeder 0742/0892
Marine Corps Service Support Schools	lstLt R D Rule Phone: 0973/0839 Bldg: Ml31	MGSgt Beckley 0710/0738 M119
Reserve Support Unit	Capt M J Stroff Phone: 3144/1790 Bldg:	GySgt Filipczuk 3144/1790
Infantry Training School	WO F L Cote Phone: 0378 Bldg:	GySgt Gladden 0200
Support Battalion	MSgt D S Keifer Phone: 5247 Bldg: 1011	Sgt Amrine 5247 1011

4

ENCLOSURE (1)



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

DATE: 10 Apr 1987 ENCLOSURE (1)





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

6240 NREAD 13 Apr 87

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

Subj: TRAINING FOR HAZARDOUS MATERIAL DISPOSAL OFFICERS

Ref: (a) BO 6240.5A

Encl: (1) HMDO's for MCB

1. In accordance with the reference, a Hazardous Waste training program will be held for primary and alternate Hazardous Material Disposal Officer's (HMDO's), on 4 May 1987. The session will be from 0900-1100 hours in the Civilian Training Classroom, Building 1003, Hadnot Point area. This training is for those HMDO's listed in enclosure (1).

2. Point of contact is Mr. Sammy Gwynn, Natural Resources and Environmental Affairs Division, extension 2195.

> J. I. WOOTEN By direction

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



UNITED ETATES MARINE CORPS. Marine Corps Rate: Qamp Lefethe, North-Caronina, 28542, 8001

6240 17 19 18 10 14 19 19 19 19 1

> trom: Coestanding General, Marine Coros Gase, Camb Legine 1979 - Distribution Link

Subt: TRAINIGTT IN TRAINING WITTERIAN BIRDSAN GITTORK.

ALLONG WE ISL. STOR

BOOL TOL STANDAR (1) MED

A MOTTORIS PERA OGME SOM OCREST TO BE ODMAS TO BE OGRESTER OCRESTER OCME SEGRE OCME SEGRE

Odwart, RYM , RYDA Odwart, RYM , RYDA

1. In accordance with the reference; a Harandows Warte frainly program will be held for primary and effernite catagoods Anterial Disposed Office(:+ (n800)'s), on a kay 1 dV. whe reacted will be from 0.900-2100 mounts in the div flan-frainly wistercom, Notifier 1003; cacher Fourt area. This finishes as for these dWDO's disted in suchoed will, we

新读。记录<u>计</u>

Maiowalas motowato vi

X: Point of control is in . Scany Owing, Mether Lebourdes and Environmental Miraire Division, extension 2195. 3

6240 NREAD 7 Apr 87

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

Subj: DRAINAGE IMPROVEMENTS TO BERKLEY MANOR HOUSING

Encl: (1) District Conservationist, USDA-SCS, 1tr of 19 Mar 87.

1. The enclosure is provided per your request. NREAD concurs with the recommendations in the enclosure. It is recommended that the A & E for the design of the subject improvements consult with the appropriate Soil Conservation Service Representative during design.

2. Mr. Danny Sharpe, extension 2083, is available to assist with the review of proposed drainage systems.

J. I. WOOTEN

roma várso et la terrativa de secondo a procession de la componia de la

1. QUA.

Last Mark

and the second second second

initian of sidelification takes donate into opagets variant in each of the second states of t

1893 John 11. 1. 1. 1. 1.



United States Department of Agriculture



Soil Conservation Service

Donald A. Halsey Ag. Bldg. 604 College Street Jacksonville, NC 28540

March 19, 1987

Julian Wooten, Director Natural Resources & Environmental Affairs Division Bldg. 1103, Base Maintenance Department Marine Corps Base, Camp Lejeune 28542

Dear Julian:

On Tuesday, March 5, 1987, Billy Jones Area Engineer and myself met with officials from Base Housing on Camp Lejeune to discuss drainage improvements to Berkeley Manor Housing Development.

During or after construction of this development, lawns were graded so that ground surface outside of buildings is higher than ground surface under buildings. At time of this review most of the problem appeared to be surface water trapped under houses.

Our recommendations for Berkeley Manor include the following:

- 1. Where practical divert surface runoff from building foundation to prevent water flowing through crawl space openings and vents.
- Construct wells outside crawl space door where surface water cannot be diverted.
- 3. Install underground drain (minimum diameter 4") to remove standing water under several houses (5-10) that have greatest problem with water under houses. Drain should be installed a minimum of 2 feet below surface on a continuous grade to outlet. Upper end of drain should be located at lowest ground elevation under each house or grade surface under each house to get surface water to drain inlet.

If we can be of further service to Camp Lejeune please notify.

1 por Haven S.

Harry S. Tyson District Conservationist

HST/vgf



The Soil Conservation Service is an agency of the Department of Agriculture



United States Department of Agriculture

USDA, SOIL CONSERVATION SERVICE DONALD A. HALSEY AG. BUILDING 604 COLLEGE STREET JACKSONVILLE, NORTH CAROLINA 28540 Official Business Penalty for Private Use, \$300



POSTAGE AND FEES PATD U.S. DEPARTMENT OF AGRICULTURE AGR-101

Julian Wooten Director Natural Resources & Environmental Affairs Division Bldg. 1103, Base Maintenance Dept. Marine Corps Base, Camp Lejeune 28542



5-3 Fill

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

4-6-87 Date

From: Director To: Da Sue attached Subj:

Interester

Julia

GlENEE/SAM

Let's Discuss. what does 'environmental Pollution problem" mean in The context of para 5.

Shape





DEPARTMENT OF THE NAVY NAVAL HOSPITAL CAMP LEJEUNE, NORTH CAROLINA 28542-5008

IN REPLY REFER TO 6260.3f/87-137-3f 371 30 Mar 87

From: Commanding Officer To: Commanding General, Marine Corps Base, Camp Lejeune, NC 28542 (Attn: AC/S, Comptroller Department)

- Subj: INDUSTRIAL HYGIENE SURVEY OF USAGE OF KODAK LIQUID DEVELOPER SYSTEM CLEANER AT DISBURSING OFFICE, BUILDING 1005
- Ref: (a) Disbursing Officer memo dtd 5 Dec 1986
 - (b) CO, NavHosp, CLNC ltr 6260.3f, 371 dtd 17 Feb 87
 - (c) 29 CFR 1910.1000
 - (d) Threshold Limit Values and Biological Exposure Indices for 1986-1987 from ACGIH

Encl: (1) Industrial Hygiene Air Sampling Results for Disbursing Office on 3 Mar 1987

1. In response to reference (a), an Industrial Hygiene Survey was conducted on 5 March 1987 at the Disbursing Office, Comptroller Department (Bldg. 1005) to determine personal airborne exposure levels to chromium and chromate during use of the Kodak Liquid Developer System Cleaner (Cat 101376) for cleaning microfilm processing equipment in the vault room. The Kodak Cleaner product contains sodium dichromate which the Industrial Hygiene Branch, Occupational Health and Preventive Medicine Department, considers to be highly suspect of carcinogenic effects in humans as stated in reference (b). The survey was performed by Mr. Jack Erdman (Environmental Health Technician) of the Industrial Hygiene Branch.

2. Gilian HFS 113A Air Sampling Pumps (Serial Numbers 15745, 15749, and 7811), DuPont P-4000 Air Sampling Pumps (Serial Numbers C565 and 6568), along with both MCEF and PVC filters were used to accomplish the survey. The pumps were calibrated before and after the sampling with a Buck Calibrator (Ser No. 31216).

3. The sampling had to be deferred until March because the cleaning of the microfilm processing equipment using the Kodak Cleaner product was discontinued while other departments on MCB were evaluating the operation for proper procedures.

4. Information, results, data, etc., concerning the sampling are provided in enclosure (1). The analyses results are well below the standards used in enclosure (1) which were obtained from references (c) and (d). One general area sample each for chromium and chromate gave 8-hour TWA airborne concentration levels of respectively 0.0006mg/m^2 and 0.0003mg/m^2 which also do not exceed the above.

5. The Industrial Hygiene Branch was notified on 25 March 87 by SGT Blankenship of the Disbursing Office that the usage of the Kodak Liquid Developer System Cleaner had beeen completely stopped because of environmental pollution problems associated with the product. The Disbursing Office should



Subj: INDUSTRIAL HYGIENE SURVEY OF USAGE OF KODAK LIQUID DEVELOPER SYSTEM CLEANER AT DISBURSING OFFICE, BUILDING 1005

coordinate the selection of an appropriate substitute product with the Industrial Hygiene Branch, Base Safety and the Natural Resources and Environmental Division.

6. Any questions concerning this report should be directed to Mr. Robert E. Bastob (Industrial Hygienist) at extension 2707.

м. By direction

Copy to: Disbursing Officer Base Safety Natural Resources and Environmental Div.





Industrial Hygiene Air Sampling Results Industrial Hygiene Branch Occupational Health/Preventive Medicine Department Naval Hospital, Camp Lejeune, NC

1. LOCATION: Disbursing Office, Comptroller Dept, MCB, CLNC Bldg 1005

2. SAMPLE DATA:

- a. Name/rate/SSN: Blankenship, Marvin L. Sgt. (5257).
- b. Job title: Pay Clerk
- c. Type of sample: Breathing zone
- d. Date sampled: 3 Mar 1987
- 3. FINDINGS:

	Results (mg/M);f/cc;ppm)				
Lab #	Substance	8-HR. TWA/C/STEL	PEL/TLV	PEL/TLV exceeded	
27172	Chromium	0.0006	0.5	No	

mg/M³: Milligrams per cubic meter

f/cc: Fibers per cubic centimeter

ppm: Parts per million

TWA (Time weighted average): An average value weighted in terms of the actual time that it exists during a given time interval.

C (Ceiling value): An exposure which cannot be exceeded for any length of time.

STEL (Short-term exposure limit): A 15 minute TWA exposure which should not be exceeded at any time during a work day.

PEL (Permissible exposure limit): The maximum permissible concentration of a toxic chemical or exposure level of a harmful physical agent (normally averaged over an 8-hour period) to which an employee may be exposed.

TLV (Threshold limit value): The TWA concentration of a substance for a normal 8-hour work day and 40-hour work week, to which nearly all workers may be repeatedly exposed, day after day, without adverse health effects.

NOTE: By OPNAVINST 5100.23B, the employee(s) monitored must be informed of the above findings. Entry of these findings into the employee's medical record will be by separate correspondence.





Industrial Hygiene Air Sampling Results Industrial Hygiene Branch Occupational Health/Preventive Medicine Department Naval Hospital, Camp Lejeune, NC

1. LOCATION: Disbursing Office, Comptroller Dept, MCB, CLNC Bldg 1005

2. SAMPLE DATA:

- a. Name/rate/SSN: Blankenship, Marvin L. Sgt (5257)
- b. Job title: Pay Clerk
- c. Type of sample: Breathing zone
- d. Date sampled: 3 Mar 1987

3. FINDINGS:

	Results (mg/M ³ ;f/cc;ppm)					
Lab #	Substance	8-HR. TWA/C/STEL	PELATLY	PEL/TLV exceeded		
27175	Chromate	0.0003	0.05	No		

mg/M³: Milligrams per cubic meter

f/cc: Fibers per cubic centimeter

ppm: Parts per million

TWA (Time weighted average): An average value weighted in terms of the actual time that it exists during a given time interval.

C (Ceiling value): An exposure which cannot be exceeded for any length of time.

STEL (Short-term exposure limit): A 15 minute TWA exposure which should not be exceeded at any time during a work day.

PEL (Permissible exposure limit): The maximum permissible concentration of a toxic chemical or exposure level of a harmful physical agent (normally averaged over an 8-hour period) to which an employee may be exposed.

TLV (Threshold limit value): The TWA concentration of a substance for a normal 8-hour work day and 40-hour work week, to which nearly all workers may be repeatedly exposed, day after day, without adverse health effects.

NOTE: By OPNAVINST 5100.23B, the employee(s) monitored must be informed of the above findings. Entry of these findings into the employee's medical record will be by separate correspondence.







Industrial Hygiene Air Sampling Results Industrial Hygiene Branch Occupational Health/Preventive Medicine Department Naval Hospital, Camp Lejeune, NC

1. LOCATION: Disbursing Office, Comptroller Dept, MCB, CLNC Bldg 1005

2. SAMPLE DATA:

- a. Name/rate/SSN: Blankenship, Marvin L. Sgt (5257)
- b. Job title: Pay Clerk
- c. Type of sample: Breathing zone
- d. Date sampled: 3 Mar 1987
- 3. FINDINGS:

	Results (mg/M ³ ;f/cc;ppm)				
Lab #	Substance	8-HR. TWAYC/STEL	PEL/TLV	PEL/TLV exceeded	
27176	Chromate	0.0081	0.1	No	
27177	"	0.0081	0.1	No	

mg/M³: Milligrams per cubic meter

f/cc: Fibers per cubic centimeter

ppm: Parts per million

TWA (Time weighted average): An average value weighted in terms of the actual time that it exists during a given time interval.

C (Ceiling value): An exposure which cannot be exceeded for any length of time.

STEL (Short-term exposure limit): A 15 minute TWA exposure which should not be exceeded at any time during a work day.

PEL (Permissible exposure limit): The maximum permissible concentration of a toxic chemical or exposure level of a harmful physical agent (normally averaged over an 8-hour period) to which an employee may be exposed.

TLV (Threshold limit value): The TWA concentration of a substance for a normal 8-hour work day and 40-hour work week, to which nearly all workers may be repeatedly exposed, day after day, without adverse health effects.

NOTE: By OPNAVINST 5100.23B, the employee(s) monitored must be informed of the above findings. Entry of these findings into the employee's medical record will be by separate correspondence.



Environmental Pollution Public SGT Blankenship was told not to put the Kodak Liguid Developer System Cleaner down the drain, It was suggested that he use smaller quantities for cleaning equipment and draw contents into a 5 gallow polychylene drum, so when fulled can be furned into Demo as a HW.

Personally, SGT Blanketship did not particularly relish this idea, so until product substitution is made, he has no choice in the matter,

Blenée


NAME OF ORGANIZATION	HAZARDOUS MATERIAL PRIMARY	DISPOSAL OFFICER ALTERNATE
Natural Resources & Environmental Affairs Division	Sammy Gwynn Phone: 5003/2083 Bldg 1103	Danny Sharpe 5003/2083 1103
Marine Corps Engineer School	Maj Ferral Phone: 7570/7275 Bldg:	lstLt G L McNutt 7528/7233
Rifle Range . Detachment	lstLt O'Hara Phone: 7510 Bldg:	GySgt J V Adams 7510
Field Medical Service School	Lt C W Hansen III Phone: 0826/0915 Bldg:	HM1 C H Schroeder 0742/0892
Marine Corps Service Support Schools	1stLt R D Rule Phone: 0973/0839 Bldg: M131	MSgt Beckly 0710/0738 M119
Reserve Support Unit	Capt M J Stroff Phone: 3144/1790 Bldg:	MSgt Butcher 3144/1790
Infantry Training School	WO F L Cote Phone: 0378 Bldg:	GySgt Gladden 0200
Support Battalion	MSgt D S Keifer Phone: 5247 Bldg: 1011	Sgt Amrine 5247 1011
Headquarters Battalion	Capt Gander Phone: 3852 Bldg: 12	GySgt J L Spann 3852/1079 12
Assistant Chief of Staff, Morale, Welfare & Recreation	D Parker Phone: 2135/2537 Bldg:	D E Raynor 2819
Assistant Chief of Staff, Logistics	Capt Peters Phone: 2536 Bldg: 1116	GySgt Burleson 2536 1116
Base Maintenance Division	D K Bullock Phone: 5300 Bldg: 1202	S Marsicano 5307/3722 1202

.



REVISED 30 MARCH 1987

	MEDICAL BN	
1481 5212	LT ROCKFORD HM1 TREVONO	1930 1930
	RADIO BN	
2923 1072	LT PFAFF SSGT SHERMAN	5114 5114
	RECON CO	
2622 1072	GYSGT WAGNER GYSGT NIXON	3545 1664
	,	
	SUPPLY BN	
2622 1693	WO.O. CLAY SSGT HOWELL	3405 3418
	and the second se	
	8thMT	
3256 3754	SSGT COX CPL D.T. BOOKER	1684 1892
	1481 5212 2923 b072 2622 1072 2622 1072 2622 1693	MEDICAL BN1481 5212LT ROCKFORD HM1 TREVONO2923 1072RADIO BN LT PFAFF SSGT SHERMAN2923 1072CYSGT WAGNER GYSGT NIXON2622 1072GYSGT WAGNER SSGT NIXON2622 1693WO.O. CLAY SSGT HOWELL2622 1693BthMT SSGT COX CPL D.T. BOOKER

MAINT BN

CAPT	ALSTON	5222
SSGT	OZUNA	5222



UNIT	HAZARDOUS MATERIAL PRIMARY	DISPOSAL OFFICER ALTERNATE
2d Mar Regt	Capt J Fechteler Phone: 3404 Bldg: HP-100	Sgt T Hutzell 3404 HP-100
6th Mar Regt	Capt W E Hetzel Phone: 3476 Bldg: 1206	MSgt D Godwin 3476 1206
8th Mar Regt	Capt Sholar Phone: 0221/0153 Bldg: TC 341	GySgt Tindall 0221/0153 TC 341
10th Mar Regt	Capt W Gordy Phone: 3165 Bldg: 1707	GySgt C E Lee 3165 1707
HQ Bn	Capt K Hulet Phone: 3296/3524 Bldg: 317	GySgt J Savage 1434 HP-301 ,
2d CEB	2dLt L DL Sjelin Phone: 3993 Bldg: 417	SSgt P Marks 3993 417
2d Tank Bn	Maj T Cornell Phone: 3861/3725 Bldg: 407	MGySgt Sloan 3861/3725 407
2d AAV Bn	Lt M D Parker Phone: 7586 Bldg: BB-5	MGySgt R D Clodfellte: 7586 BB-5
2d Recon Bn	Capt L G Flores Phone: 7124/7530 Bldg: BD-102	GySgt W Dean 7124/7530 BD-102
2d LAV Bn	Lt Gonzales Phone: 2301/1477 3305 Bldg: 1750	Gygt Stokes 2301/1477 1843/1992 1750



MARINE CORPS BASE

		SPECIAL SERVICES &	MARINE CORPS	EXCHANGE
SITE	#1	BLDG.	#1103	AUTO HOBBY SHOP
	#2	н	1120	и и и
	#3	BLDG.	#TC-470	и и и
	#4	BLDG.	#BB-71	п п' п
	#5	BLDG.	#1916	GOLF COURSE MAINT
	#6	BLDG.	#31	GOTTSCHALK MARINA
				BOAT HOUSE
	#7	BLDG.	#1611	HADNOT POINT SERVICE STATION
	#8	BLDG.	#TT-2453	SERVICE STATION
	#9	II.	#AS-410	. u . u
	#10	п	#BB-177	п п
	#11	BLDG.	#25	LAUNDRY & DRY CLEANING SHOP
		HEADQUA	RTERS BN MCB	
SITE	#1	BLDG.	#11 ,	ARMORY
		BASE M.	AINTENANCE	
SITE	#1	BLDG.	#AS-122	MAINT & REPAIR DIV
	#2	BLDG.	# 1102	DATNT SHOD
	#3	BLDG	# 1202	GENERAL TRADES BRANCH
	" 3	bibo.	11 1202	ELECTRICAL SHOP
	#4	BLDG.	# 1700	UTILITIES DIV, STEAM GENERATION
	•	_FIELD ME	DICAL SCHOOL	
SITE	#1	BLDG.	#B-M308	ARMORY
		INFAN	TRY TRAINING S	SCHOOL
SITE	#1	BLDG.	#TC-816	ARMORY
1.00	#2	"	#TC-817	COMM SHOP
	#3	and the stand of the stand of the	#TC-820	ARMORY
		1	MCES	
SITE	#1	BLDG	#BB-49	ARMORY
	#2	"	#BB-51	MAINTENANCE
	#3		#BB-294	UTILITIES INST CO.
		RESERVE S	SUPPORT UNIT	

SITE #1

BLDG. #1111

MAINTENANCE FACILTY



MARINE CORPS BASE

SUPPORT BATTALION

.

SITE	#1	BLDG.	#1117	ARMORY
		MARINE CORPS SER	VICE SUPPORT S	SCHOOLS
SITE	#1	BLDG.	#M119	
	#2	u	M120 M191	a series and the series of the series
	#3	DTS M	OTOR POOL	
		AC/S,	LOGISTICS	
SITE	#1	BLDG.	#1502	MOTOR TRANSPORT
	#2		908	BODY SHOP
	#3	n	80	PRINTING PLANT
	#4	BLDG.	#AS-118	MOTOR TRANSPORT



			ale al anticipation	
		2	D FSSG	
		2D MA	INT BN	
SITE	#1	BLDG.	#FC-40	H&S CO
	#2	BLDG.	#909	OPERATIONAL READINESS FLOAT
	#3	BLDG.	#1601	MOTOR TRANSPORT MAINT CO
	#4	BLDG.	#1601	GENERAL SUPPORT MAINT CO
	#5 #6	BLDG. BLDG.	#901 #902	ORDNANCE MAINT CO ENGINEER MAINT CO
		2D S	UPPLY BN	
STUE	#1	BLDC	#RC 963	NOTOD TO NADODT CO
SIL	#2	BLDG. BLDG.	#PC-203 # 915	PRESERVATION, PACKAGING
	#3	BLDG.	# 916	DEPLOYMENT SUPPORT UNIT
	#4	BLDG.	#TP-457	FLAMMABLE STORAGE WARE- HOUSE
		8th ENGI	NEERS SUPPLY	
SITE	#1	BLDG.	#FC-200	MAINTENANCE
	#2	BLDG.	#GP-13	COMMUNICATIONS SHOP
	1	8th COMM	UNICATIONS BN	
SITE	#1	BLDG.	#FC-100	MOTOR TRANSPORT & ELECTRONIC MAINT
	#2	BLDG.	#FC-100	MOTOR TRANSPORT & ELECTRONIC MAINT BATTERY ROOM
	#3	BLDG.	#1605	"A" CO., RADIO PLT
	#4	BLDG.	#1604	"B" CO., RADIO PLT
		2D RA	DIO BN	
SITE	#1	BLDG.	#FC-241	MOTOR TRANSPORT
	#2	BLDG.	#FC-365	COMMUNICATIONS SHOP
		FOR	ECON CO	
SITE	#1	BLDG.	#251	COMMUNICATIONS SHOP
		2D	ANGLICO	
SITE	#1	BLDG.	#FC-251	MOTOR TRANSPORT

See.





2DLOGSPTBN

		An an and a second s
SITE	#1	BLDG. #FC-120
5775	#2	" #FC-302
	#3	BLDG. #1871

MOTOR TRANSPORT ARMORY COMMUNICATION SHOP



2D MARINE DIVISION GENERATING/STORAGE SITES

		HOBN	
SITE	#1	BLDG. #1780	TRUCK CO
		2D CBT ENG	
SITE	#1 #2	BLDG. #1803	HEAVY EQUIPMENT MOTOR TRANSPORT
		2D TANK BN	
SITE	#1 #2	BLDG. #1854	MOTOR TRANSPORT MOTOR TRANSPORT BATTERY ROOM
	#3	н	TANK FACILITY
		2D LAV BN	
SITE	#1 #2 #3	BLDG. #429 , " #1750 " #1755	COMMUNICATIONS SHOP MOTOR TRANSPORT MAINTENANCE SHOP
		2D AMTRAC BN	
SITE	#1 #2 #3	BLDG. #A-2 BLDG. #A-47 BLDG. #A-47	MOTOR TRANSPORT MAINTENANCE SHOP MAINTENANCE SHOP BATTERY ROOM
		8th MAR, HQCO	
SITE	#1 #2 #3	BLDG. #TC-773 BLDG. #G-480 BLDG. # 721	MOTOR TRANSPORT SEC ARMORY COMMUNICATIONS CO





Ken warren Glewer gle

37

5090 1143SGO

From: Commander, Atlantic Division, Naval Facilities Engineering Command To: Commanding General, Marine Corps Base, Camp Lejeune

Subj: HAZARDOUS WASTE, USED SOLVENT ELIMINATION AND POLYCHLORINATED BIPHENYL COMPLIANCE ASSESSMENTS

Ref: (a) OPNAVINST 5090.1

Encl: (1) Hazardous Waste, Used Solvent Elimination and Polychlorinated Biphenyl Compliance Assessment; Marine Corps Base, Camp Lejeune and MCAS New River, North Carolina

1. In accordance with reference (a), a Hazardous Waste, Used Solvent Elimination and Polychlorinated Biphenyl compliance assessment was conducted at Marine Corps Base, Camp Lejeune on 29-31 October 1986.

2. Enclosure (1) is forwarded for your review and implementation as appropriate.

3. Our points of contact are as follows:

Hazardous Waste - Mr. Steve Olson Used Solvent Elimination - Mr. John Kresky PCB Compliance - Mr. John Kresky

4. Mr. Olson or Mr. Kresky may be reached at Commercial (804) 445-2935 or AUTOVON 565-2935.

J. R. BAILEY By direction

Copy to: CMC MCAS New River COMNAVFACENGCOM NEESA



HAZARDOUS WASTE, USED SOLVENT ELIMINATION AND POLYCHLORINATED BIPHENYL COMPLIANCE ASSESSMENT MARINE CORPS BASE, CAMP LEJEUNE AND MCAS NEW RIVER, NORTH CAROLINA

I. Executive Summary

A. Purpose

A Hazardous Waste (HW), Used Solvent Elimination (USE) and Polychlorinated Biphenyl (PCB) Compliance Assessment was conducted at the Marine Corps Base, Camp Lejeune and MCAS New River, North Carolina on 29-31 October 1986. The purpose of this effort was to assess activity compliance with applicable federal, state and local laws, regulations and Navy/Marine Corps directives concerning management of these programs. A one page summary of all three programs is provided in Attachment A.

B. Compliance with Regulations and Directives.

The hazardous waste management programs at both activities are partially in compliance with existing laws/regulations. The existing problems can be easily remedied by the activity as described, particularly if additional manpower is made available for training, program implementation and inspection/oversight.

The PCB management program has a few compliance problems which can be relatively easily corrected. The problem involved record keeping and proper marking of transformers.

The USE program is on track for implementation in accordance with CMC directives. Various commands have contracted with private (civilian) solvent vendors to provide solvent cleaning stations where needed.

C. Facility Representatives Contacted during the Assessment were:

Mr.	Danny Sharpe	Ecologist
Mr.	Manuel Martin	Physical Science Technician
Mr.	Julian Wooten	Director, Natural Resources and Environmental Affairs Division
Ms.	Mary Wheat	Hazardous Material Coordinator MCAS New River

II. Hazardous Waste Management

A compliance assessment was conducted of the HW management program on 29 - 31 October 1986. The assessment was conducted by Mr. Steve Olson, and included both a records inspection and an inspection of activity operations relating to HW management.

A summary with recommendations for the HW management program follows:

r 1/1

MARCORB Camp Lejeune

1. The State of North Carolina issued a HW Part B permit to MARCORB Camp Lejeune on 7 September 1984. After a review of the permit application, it appears to meet the absolute minimum standards for a Part B permit.



Recommendation: Continue operating under the permit as issued, however, be aware of the permits shortcomings and the need for update of particular areas of the permit (i.e., contingency plan, waste analysis plan etc.). When the permit is revised. the hazardous material/waste management plan (with detailed waste analysis plan) prepared by ENSAFE under Contract Number N62470-85-B-7979 will provide valuable information for updating the permit.

2. During the inspection of temporary (less than 90 day storage areas), containers were found open with bungs missing, unmarked as to their contents and missing accumulation start dates. In addition, several empty automotive storage batteries were found sitting upside down on bare soil.

Recommendation: Ensure that all HW collection containers are properly closed, labeled and marked with accumulation start dates. Do not store empty batteries upside down where residual battery acid can leak out and contaminate the ground.

3. Weekly container inspections at temporary storage areas have not been conducted and documented as required by 40CFR264.174.

Recommendation: Ensure that all required inspections are conducted and documented by responsible generating activities. An oversight inspection should be provided by the Natural Resources and Environmental Affairs (NREA) Division.

4. All personnel involved in HW management, particularly at the generator level, have not been properly trained to perform their assigned jobs as required by 40CFR264.16.

Recommendation: Revise the training plan and implement both initial and continuing training for all employees involved with HW management. Training should be properly documented and reviewed with each individual at least annually.

5. Manifests were missing -a 24 hour emergency notification number and some were missing the required waste minimization statement.

Recommendation: Ensure that all manifests are completed to include these items.

6. The activity had not received return copies of all manifests within the alloted time frame.

Recommendation: Manifests must be closely monitored and accounted for as prescribed in 40CFR262.42. If signed manifest return copies are not received within 35 days of shipment, contact must be made with the transporter/TSDF to determine the status of the shipment. If the completed manifest is not then returned from the designated facility within 45 days of shipment, an exception report must be filed with the State of North Carolina and EPA Region IV.



7. Safety Kleen, Incorporated, has performed massive changes of manifest information on-site, i.e., name of generator, EPA identification number, etc., rather than initiating new original manifests at the Transportation Management Office (TMO).

Recommendation: To ensure that manifests remain legible, all manifests should be initiated specifically for the activity.

8. Waste solvents have been transported from MCAS New River to the TMO unmanifested and subsequently have had the manifest initiated at the TMO using MARCORB Camp Lejeune EPA identification number. MCAS New River wastes have also been manifested from New River using MARCORB Camp Lejeune EPA identification number.

Recommendation: Manifest all HW leaving base from a generator location using the correct EPA identification number.

9. While inspecting the Defense Reutilization and Marketing Office (DRMO) storage facility, an area of concern was discovered. This is the sale of excess government hazardous materials to civilian personnel who are not knowledgeable of what they are buying or the hazards associated with the materials they are buying.

Recommendation: Closely monitor DRMO hazardous property sales operations to reduce the potential of bad press coverage and potential liability of the base Commander. Concerns over hazardous property sales were raised to the Defense Reutilization and Marketing Service (DRMS) Battle Creek in Attachment B.

MCAS New River

1. See MARCORB Camp Lejeune recommendation Numbers 3, 4, 5, 7, 8 which also apply to MCAS New River.

2. The contingency plan does not list all temporary storage areas.

Recommendation: Update the contingency plan to ensure that all temporary HW storage areas are included.

3. There were several drums of "unknown" HW which require identification and disposal.

Recommendation: Work with MARCORB Camp Lejeune to identify the unknown HW and dispose of it through DRMO Camp Lejeune. Contract laboratory assistance is available through LANTNAVFACENGCOM on a reimbursable basis if needed.

III. Used Solvent Elimination (USE) Program

The USE program asessment was conducted on 30 October 1986.

A summary with recommendations for the USE program follows:



1. The activity generates greater than 400 gallons of used solvents per year and CMC requires full implementation of the USE program by 2 October 1986. MARCORB Camp Lejeune has contracted with a civilian solvent supplier/reclaimer. MCAS New River is using Safety Kleen, Incorporated at one location and they and other commands are presently exploring further use of these services at the activity.

IV. Polychlorinated Biphenyl Management

A PCB compliance assessment was conducted at MARCORB Camp Lejeune, North Carolina on 29-31 October 1986 to determine the status of compliance with federal regulations governing PCBs. The assessment was conducted by Mr. John Kresky. The effort included records inspection and on-site inspections of PCB transformers along with information gathering conversations with other base personnel.

A summary with recommendations for the PCB management program follows:

1. Record keeping is fragmented and difficult to assess. Inspections are recorded on forms kept loose leaf style rather than bound book style. It was not possible to determine the completeness of the records during the limited visitation time. It appears that all recent inspections and inventories can be accounted for. (40CFR761.80)

Recommendation: A complete set of records should be assembled and kept with a designated responsible party. Consideration should be given to maintaining records in bound record books. Photo copies could be made and distributed to the appropriate offices when necessary. The records should be accessible by more than one person to insure availability when needed.

NOTE: The annual CMC/OPNAV report does not completely fulfill the PCB record keeping requirements at 40CFR761.80.

2. Physical Condition -- Of the 15 transformers inspected, one was found to be leaking. This transformer was located adjacent Building AD-205, the Movie Theater. The leak appeared to be of recent origin. The leak was said to be repaired within 24 hours after discovery. All other transformers appeared to be in relatively good physical condition. There were no transformers that could be considered a risk to food and feed.

3. Several PCB vault doors not properly labeled. (40CFR761.40)

Recommendation: Provide proper labels for each door leading to a PCB transformer enclosure.

4. No SPCC for nonconforming PCB storage. (40CFR761.45)

Recommendation: Develop and implement a Spill Prevention Control and Countermeasure Plan.

5. No official plan for decontamination of PCB contaminated material. (40CFR761.79)



Recommendation: Use procedures outlined in NEESA 20.2-028B, PCB Program Management Guide and 40CFR761.79.

6. Marking -- A simple random sample of 15 transformers was taken from the last annual inventory sheets and an inspection was made of each transformer on 29-30 October 1986. Of the 15, all were marked but with an improper label.

Recommendation: Each PCB transformer be marked with the mark as in 40CFR761.45 as amended.

7. GENERAL - Several deadlines were recently set forth in 40CFR761.30. The most notable that required activity action included the following:

(a) As of 1 October 1985, the use and storage for reuse of PCB transformers that pose a risk to food or feed is prohibited.

(b) As of 1 October 1990, the use of network PCB transformers with secondary voltages equal to or greater than 480 volts in or near commercial buildings is prohibited.

(c) As of 1 October 1990, the use of radial PCB transformers and network transformers with secondary voltages below 480 volts in use in or near commercial buildings must be equipped with electrical protection to avoid transformer failure caused by high current faults.

Recommendation: MARCORB Camp Lejeune, North Carolina should prepare/submit the required projects for meeting these deadlines/requirements. Pollution Abatement (P/A) funding can be requested, but current funding levels are not_adequate to timely meet these compliance requirements.

A summary inspection assessment is provided as Table 1.

8. Storage items not properly marked (761.65).

Recommendation: Properly mark transformers with the date taken out of service.

9. No hydraulic systems are known to contain PCBs.

10. Updated transformer risk assessments should be prepared at MARCORB Camp Lejeune, in accordance with recent CNO directions. In accordance with CNO letters dated 18 October 1985 and 26 June 1986, it is recommended that risk assessment models be used to determine a replacement priority list for funding. Based upon the risk assessment, a pollution abatement project should be developed for transformer replacement. The following transformers are not technically in violation, but considered high risks:



(a) Camp Lejeune High School - Since the PCB transformer is located inside the building, a transformer fire would totally disable this facility. A fire in a transformer when school was in session would become a castastrophe of extraordinary proportions.

Recommnedation: Pursue available avenues of remediation for retrofit and/or relocation.

A summary inspection assessment is provided as Table 1.

TRANSFORMERS INSPECTED AT MARINE CORPS BASE, CAMP LEJEUNE, NORTH CAROLINA

Serial Number	Building	Comments
110065B	CLHS	Need Mark on both vault doors (1) (2)
3160815	H1	(1)
3161515	H1	* (1)
3380120	H1	(1)
4161514	Hl	(1)
5538054	AS3502	(1)
5538055	AS3504	(1)
6740378	AS205	Small Leak, (Needs Remediation (1) (2)
8036378	B900	<pre>/ Need mark on Vault Door (1)</pre>
8036379	B901	(1)
8036380	B901 *	(1)
5854205	HP460	(1)
PAT1046-01	AS320	(1)
PCV0804-01	AS4020	(1)
RFK0874	HP2	(1)
TAV2471-01	FC420 _	(1)

(1) Marking not in accordance with 49 CFR761.45, "Marking Formats"

(2) "Commercial" Locations (EPA requires removal by 1990)





GENERAL INFORMATION

ACTIVITY T	TLE:MARCORB Camp Lejeune
LOCATION:	Jacksonville, North Carolina-
CLAIMANT:	CMC
EFD: LANTE	JAVFACENGCOM
	SURVEY: Oct 86
DATE UF (DAY/MO/YR)	REPORT:
	LAST REPORT:None
REGULATOR	Y STATUS:G, S
(G, T, S, D, Tr, SQ,	NR) ·
ACTIVITY TY	PE:

HW COMPLIANCE

PERMIT "A" OR "B": B

7				
õ	ANALYSIS:DEF			- 14
1	ACCUMULATION:			
I	PRE-TRANSPORT:		200	1.1 E.A.
Z	MANIFEST:			
5	RECORDS & REPORTS:	4. 		
	TRANSPORTER:			
D L	SECURITY: Y		ing dia 1994. Ny INSEE dia Mampiosa dia mampios	
	INSPECTION:	Calif.	4.44	
I	TRAINING:		-	
5	PREPAREDNESS/PREVENTION: _	Y		
٤	CONTINGENCY: DEF	-		1.1.1
נ	GW MONITORING: _NR		the second	
ĵ	CLOSURE, POST-CLOSURE:Y			
•	MISCELLANEOUS:	- 1		

PCB

RECORDS:	DEF
INVENTORY:	- T
INSPECTIONS:	Y
ANNUAL REPOR	кт: <u>Y</u>
MARKING:	DEF
TRANSFORMER	MGMT:Y
STORAGE: DE	F
CONTAINERS: _	Y
DISPOSAL: Y	
DECONTAMINAT	TON: DEF
USE PRC	GRAM
OVER OR UNDER PROPER DISPOS	R 400g/YR:
USE PROGRAM:	Y
PROGRAM MGM	ІТ: <u>Ү</u>
INVENTORY: Y	
OPTIONS EVALU	ATED: V

IMPLEMENTED: Y

KEY

Y - YES, COMPLETE COMPLIANCE N - NO, MAJOR PROBLEM DEF - DEFICIENCY, MINOR PROBLEMS UNK - UNCLEAR T - TREATMENT S - STORAGE D - DISPOSAL SQ - SMALL-QUANTITY GENERATOR G - GENERATOR NR - NOT REGULATED A - PART A B - PART B

