

Vol III



6241/2
NREAD
8 OCT 87

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

Subj: HAZARDOUS WASTE DETERMINATION ON DRUM AT BUILDING 1700

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

JDS
Supply Encl.

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

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

J. I. WOOTEN

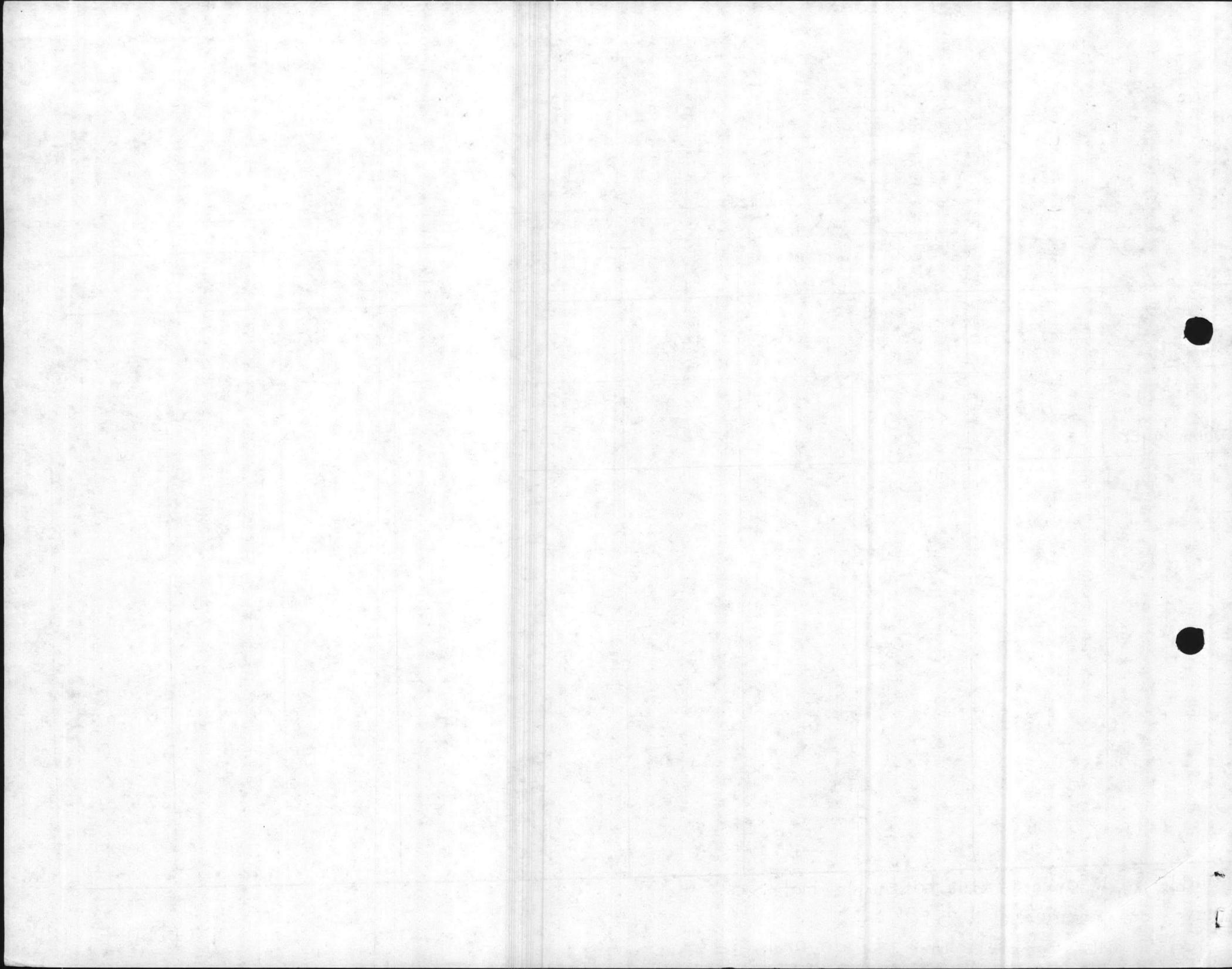
Copy to:
Base HMDC
DRMO

Blind copy to:
EC&MS (2)

Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine
 Date: 4-22-87 Report No. 539 to Naval Facilities Engineering Command, Norfolk, Virginia
 JTC Data Report No. 87-132 Table 3

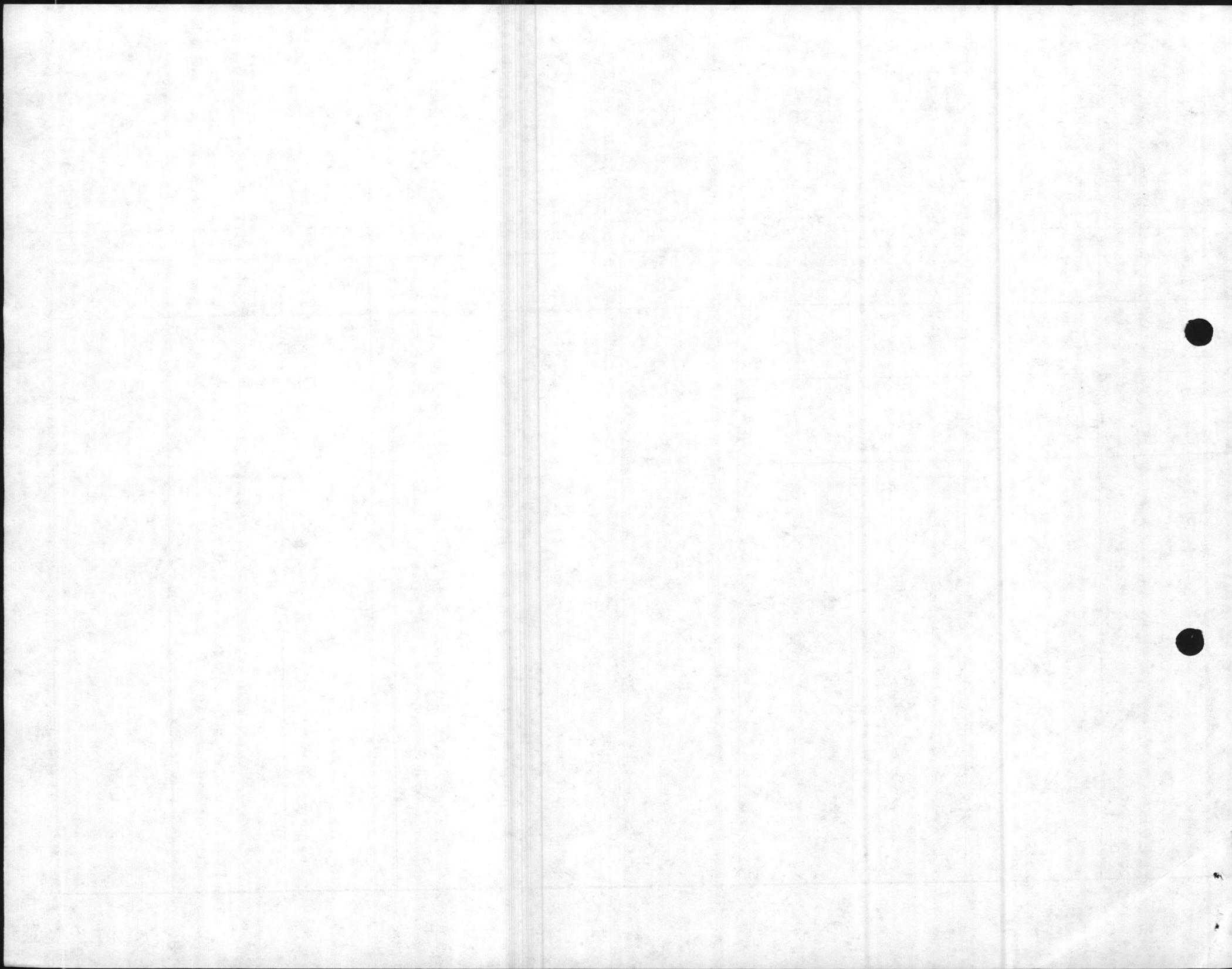
NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER					
		TOX ppm	Corrosivity pH	Flashpoint [#] °C	PCB ug/g		
87-20 top layer	12-4453	100	*	40	<5		
87-20 bottom layer	12-4453	<500	*	35	**		

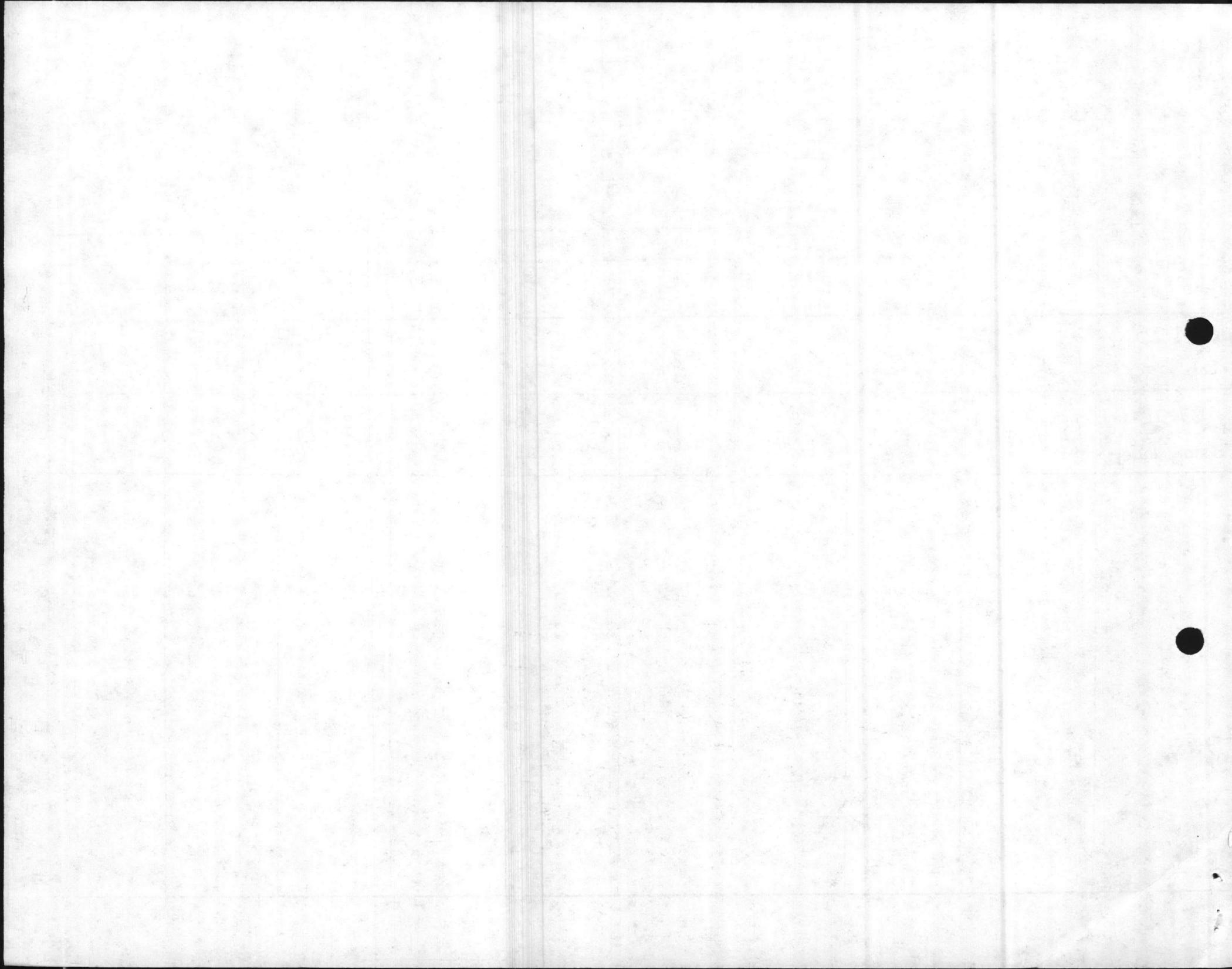
* unable to do analysis due to sample matrix
 † level of confidence ± 5°C
 * insufficient sample volume to do analysis



Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine
 Date: 6-17-87 Report No. 539 Add to Naval Facilities Engineering Command, Norfolk, Virginia
 JTC Data Report No. 87-132 Table 3

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





6240
NREAD
6 Oct 87

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

Subj: HAZARDOUS MATERIAL PACKAGING TRAINING

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

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

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

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

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

J. I. WOOTEN

DP2

1945
10/10

From: Director, Federal Bureau of Investigation
To: SAC, New York
Subject: [Illegible]

17

Re New York letter to Bureau dated 10/10/45.

Enclosed for the Bureau are two copies of a letterhead memorandum (LHM) dated and captioned as above.

The LHM is being prepared by the New York Office and is being prepared in accordance with the instructions of the Bureau dated 10/10/45.

Very truly yours,
[Illegible Signature]

[Illegible Name]

LIST OF NOMINEES

SECTION A

NREAD:

Ken Warren
Sammy Gwynn
John Riggs
Manuel Martin
Tom Barbee

Hazardous Waste Inspectors and Specialists

SECTION B

2D Marine Division:

Lt Gonzales, Division Engineer, Hazardous Material Disposal
Coordinator

SECTION C

2D Force Service Support Group:

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

SECTION D

MCAS, New River:

Barbara Coogle, Grounds Safety Office, Hazardous Material Disposal
Officer

SECTION E

Defense Reutilization and Marketing Office:

Nadine Hipp, Chief

SECTION 1

READ

Ken Weller
Sammy Gwyn
John Rice
Manuel Martin
Tom Barber

hazardous waste inspectors and assistants

SECTION 2

20 Marine Division

15 - Onshore Division, Hazardous Material Division
Coordinator

SECTION 3

20 Force Service, 2001 Project

15 - Back, Facilities and Safety, 2001 Hazardous Materials
Principal Coordinator

SECTION 4

1002, New River

Hazardous Waste, Division Safety Office, Hazardous Material Division
Officer

SECTION 5

Defense Mobilization and Marketing Division

Marketing, Chief



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

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

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

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

Encl: (1) CG FMFLant 281830Z Sep 87

1. Request that you review the enclosure and submit requirements to this department (Attn: Base Training) by 6 October 1987.
2. Point of contact at this department is SSgt Scott, extensions 1714/5276.


J. F. CHARLES
By direction

NO. & NAMES

NO. 11111

SIZES TO THIS CMD NLT 5 OCT 1987.

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

BT

367405/271
CSN:AU1B00455

2 OF 2 MATA0281 271/21123Z

281830Z SEP 87
CG FMFLANT//SM

6240
NREAD
5 Oct 87

MS
Supy Evi.

From: Director, Natural Resources and Environmental Affairs
Division, Marine Corps Base, Camp Lejeune
To: Base Motor Transport, Marine Corps Base, Camp Lejeune
Subj: CAUSTIC VAT AT BUILDING 1502

1. Method of disposal of contents of the vat (both liquid and solids), cannot be properly determined until Material Safety Data Sheet (MSDS) is received for review as requested by this office on 3 September 1987.
2. Please notify Mr. Sammy D. Gwynn, Natural Resources and Environmental Affairs Division, extension 2083, upon receipt of the MSDS.

J. I. WOOTEN

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

1952
MAY
1952

From: Director, Bureau of Environmental Affairs
Division: Marine Birds and Game
To: Director, Bureau of Environmental Affairs

Subject: CATTLE AND BIRDS

The Bureau of Environmental Affairs is pleased to advise you that the Bureau of Environmental Affairs has received a report from the Bureau of Environmental Affairs regarding the presence of cattle in the area of the Bureau of Environmental Affairs.

The Bureau of Environmental Affairs is pleased to advise you that the Bureau of Environmental Affairs has received a report from the Bureau of Environmental Affairs regarding the presence of cattle in the area of the Bureau of Environmental Affairs.

1952

Copy to:
ACB
ACB
ACB
ACB
ACB

NREAD

6240

NREAD

OCT 0 2 1987

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

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

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

SW
Ecology 18

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

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

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

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

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

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

6240
NREAD

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

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

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

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

T. J. DALZELL
By direction

Copy to:
SJA
DRMO

Faint, illegible text, possibly bleed-through from the reverse side of the page. The text is too light to transcribe accurately.

File
Julian
Good Letter
DOS

6280/2
FAC
OCT 02 1987

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

NS

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

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

- a. Where munitions are disposed.
- b. How much and with what frequency munitions are disposed.
- c. What types of munitions are disposed.
- d. Under what circumstances is disposal of munitions a bonafide training function.
- e. The methods of disposal with indications of the primary/secondary/tertiary methods.
- f. The impact should Camp Lejeune not be permitted to dispose of munitions at Camp Lejeune.

OCT 2 1987

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6280/2
FAC
OCT 02 1987

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

Subj: DISPOSAL OF MUNITIONS

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

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- e. The methods of disposal with indications of the primary/secondary/tertiary methods.
- f. The impact should Camp Lejeune not be permitted to dispose of munitions at Camp Lejeune.

OCT 3 1967

AdW

Davis DDS Full Hq Waste

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 7-8-87

TO:

BASE MAINT O

DIR, FAMILY HOUSING

PUBLIC WORKS O

DIR, BACHELOR HOUSING

COMM-ELECT O

BASE FIRE CHIEF

DIR., NAT. RESOURCES & ENV. AFFAIRS

ATTN: *Mr Wosten*

1. Attached is forwarded for info/action. *Request you prepare memo to AFMC (par 3) and prepare change to BO.*

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

Overcome by events. DDS

3. Your file copy.

*BW Elton
By dia*

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

76280/2

4

APR 28 1987

4WD-WC

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

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

Dear General Cassity:

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

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

Sincerely yours,

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

Enclosure

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

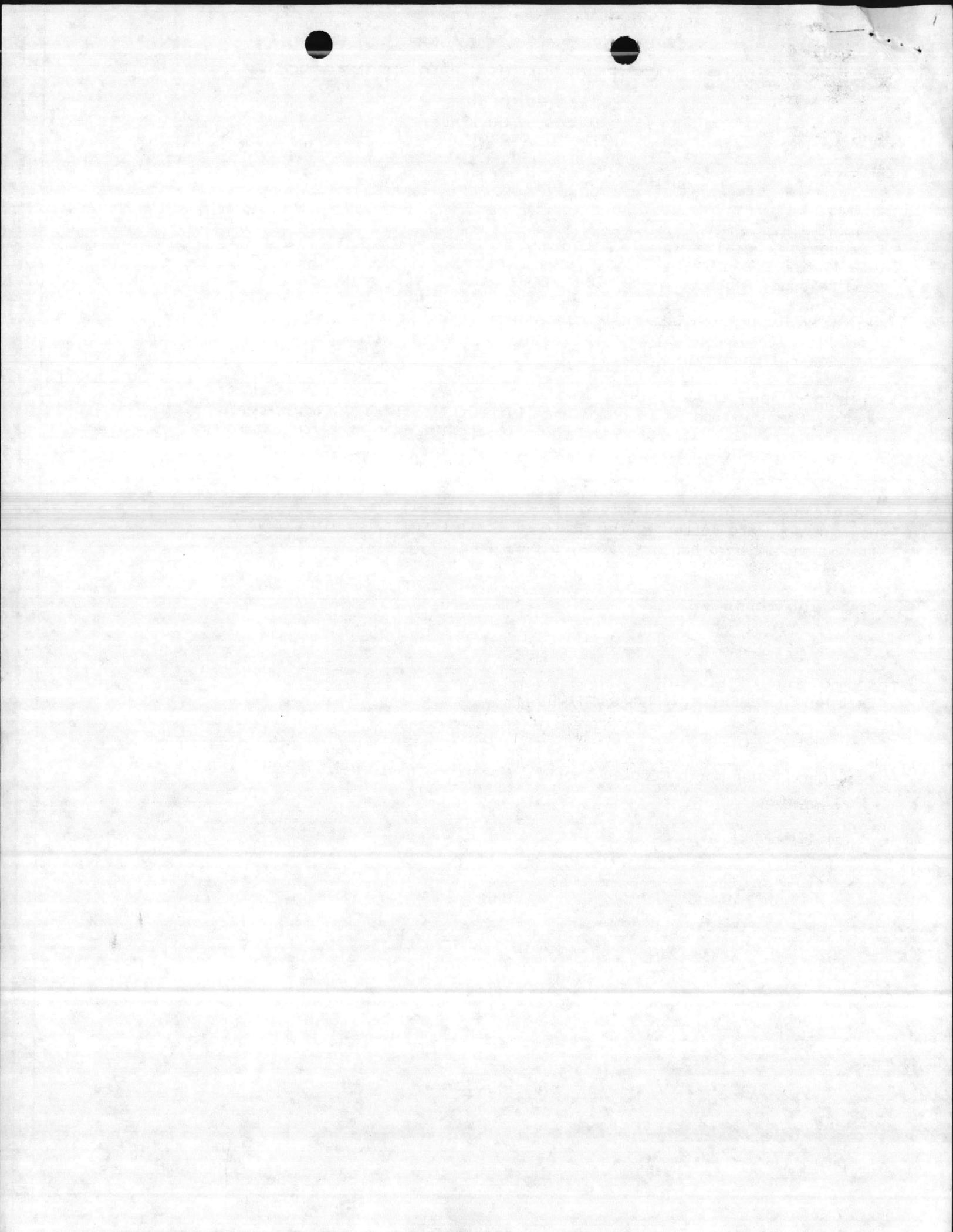
~~5 MAY 1987~~

1 May 1987

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

- SJA
- FACILITIES
- HAZ!

MAY 1 1987



ROUTING AND TRANSMITTAL SLIP

Date

4/8/87

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

Action	File	Note and Return
Approval	For Clearance	Per Conversation
<input checked="" type="checkbox"/> As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

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

Any questions let me know

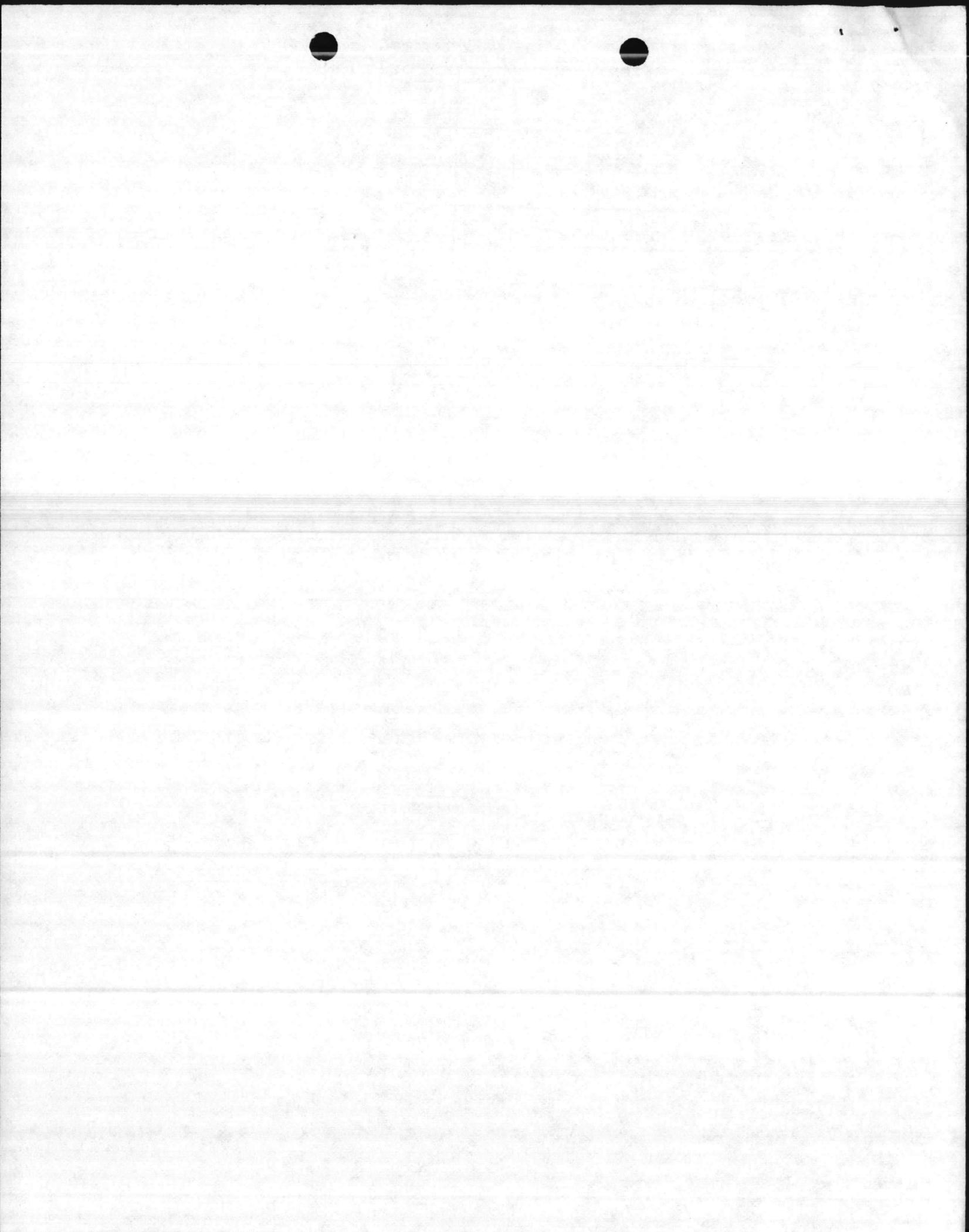
DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

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

5041-102

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

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





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

Johnson
RECEIVED

DEC 04 1984

30 NOV 1984

AIR & HAZARDOUS
MATERIALS DIVISION
OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Copies
John H. Skinner
David Wagoner
John H. Skinner

MEMORANDUM

SUBJECT: Classification of Small Arms Ammunition
With Respect to Reactivity

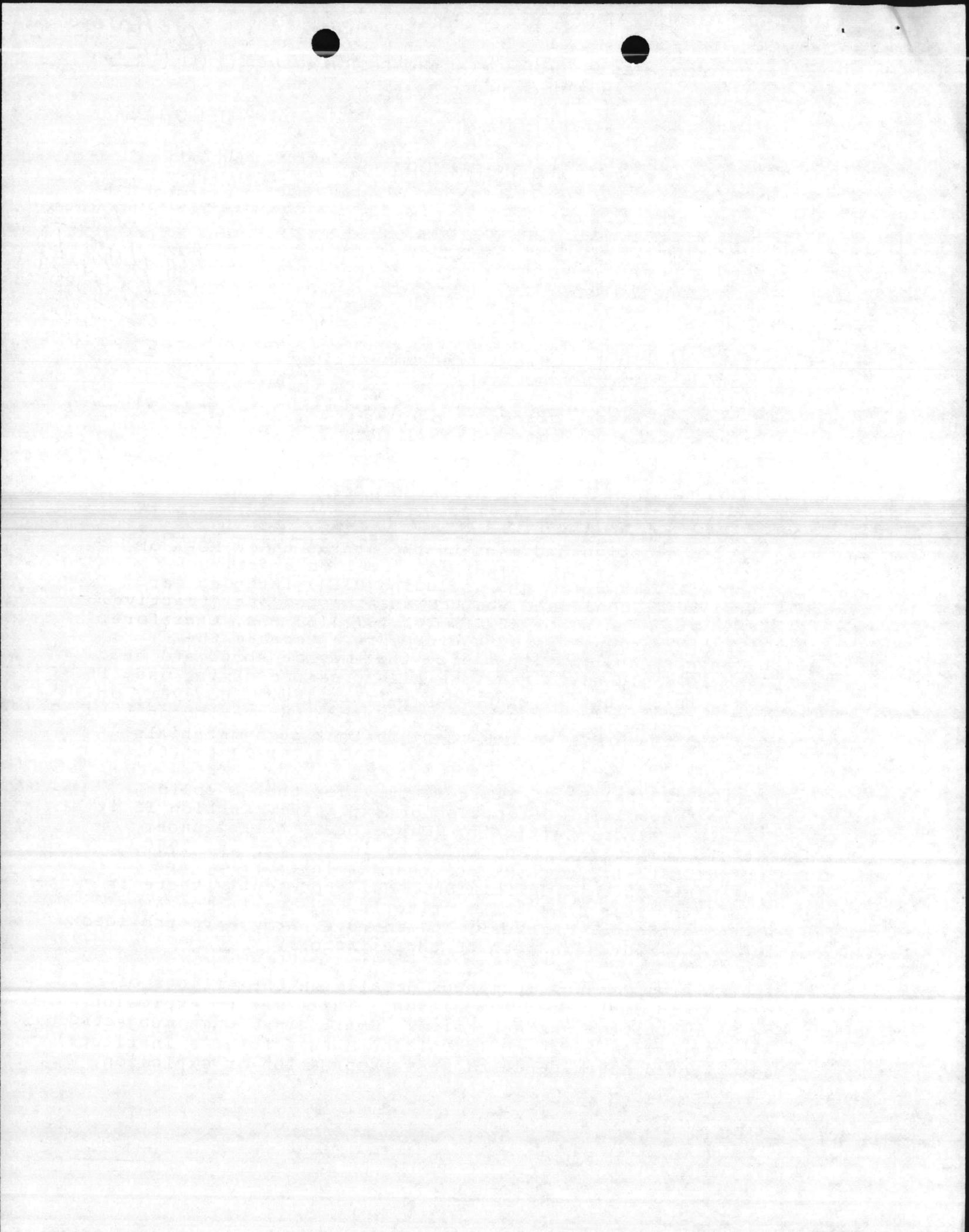
FROM: John H. Skinner, Director
Office of Solid Waste (WH-562)

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

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

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

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



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE JUN 4 1984

SUBJECT Tooele Army Depot

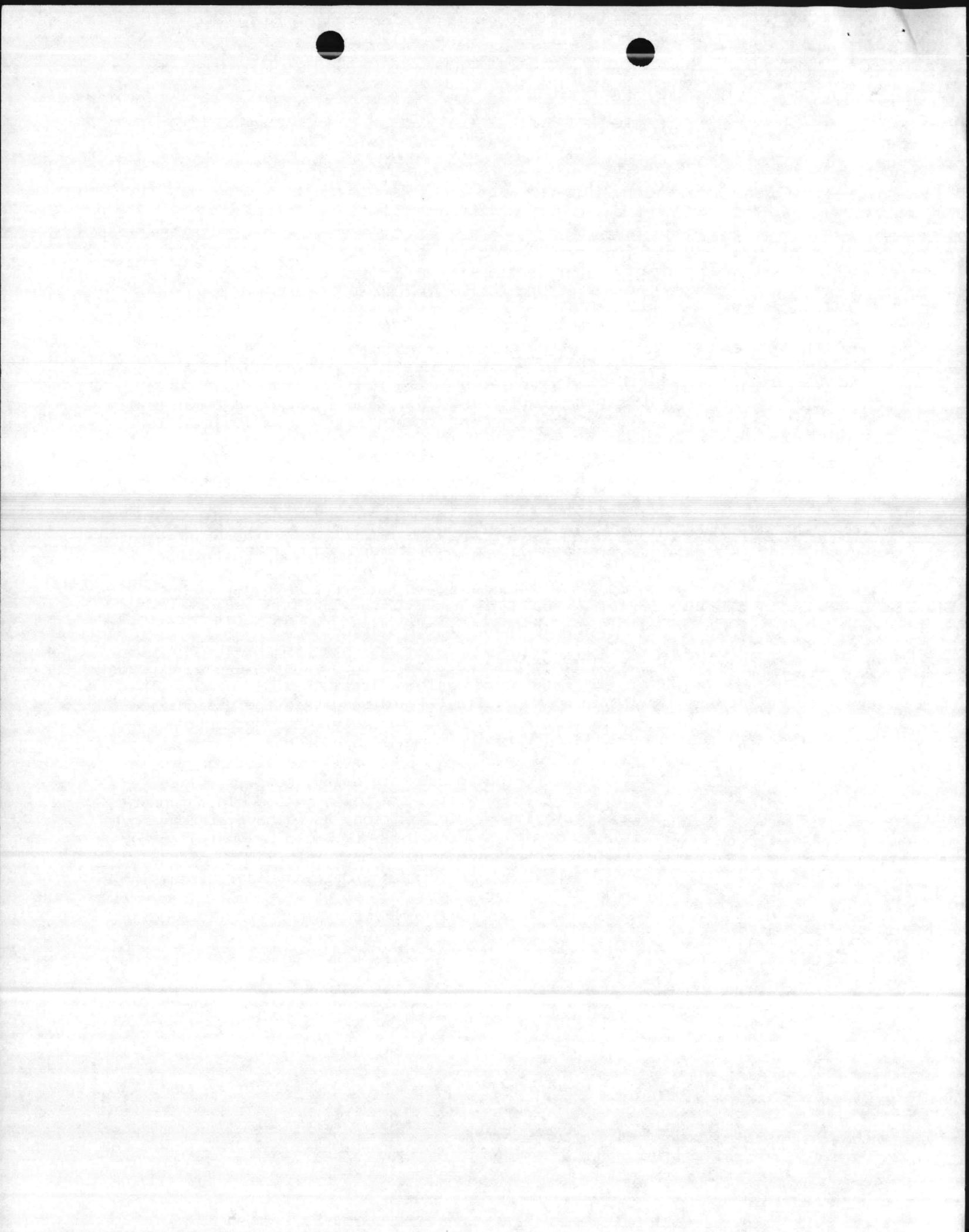
FROM Matthew A. Straus, Acting Chief *Matt*
Waste Identification Branch, (WH-562B)TO Jon P. Yeagley, Chief
State Programs Section, (8AW-WM)

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

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

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

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





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

OCT 3 1985

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

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

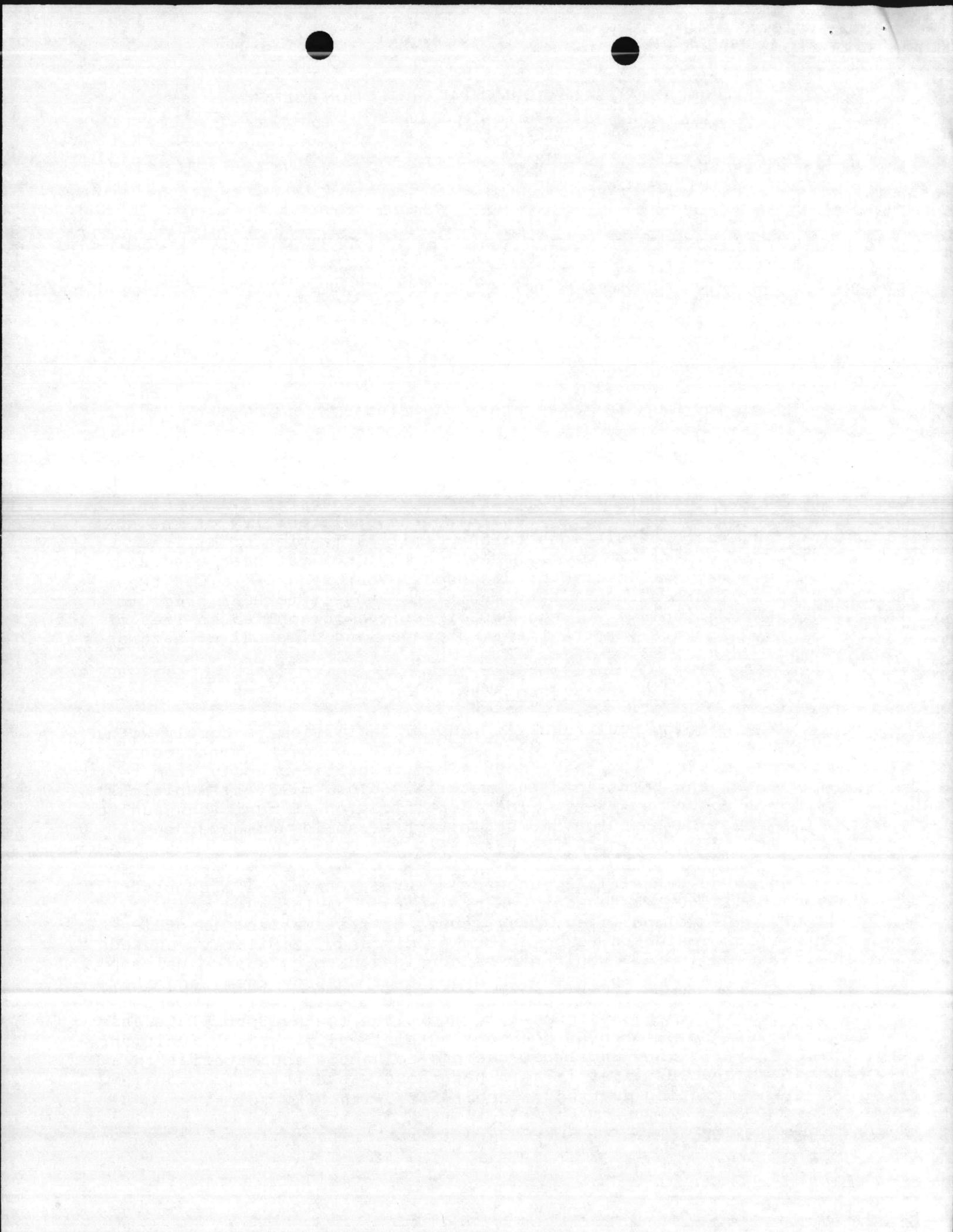
Dear Mr. Schafer:

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

Military Munitions Subject to RCRA

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

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



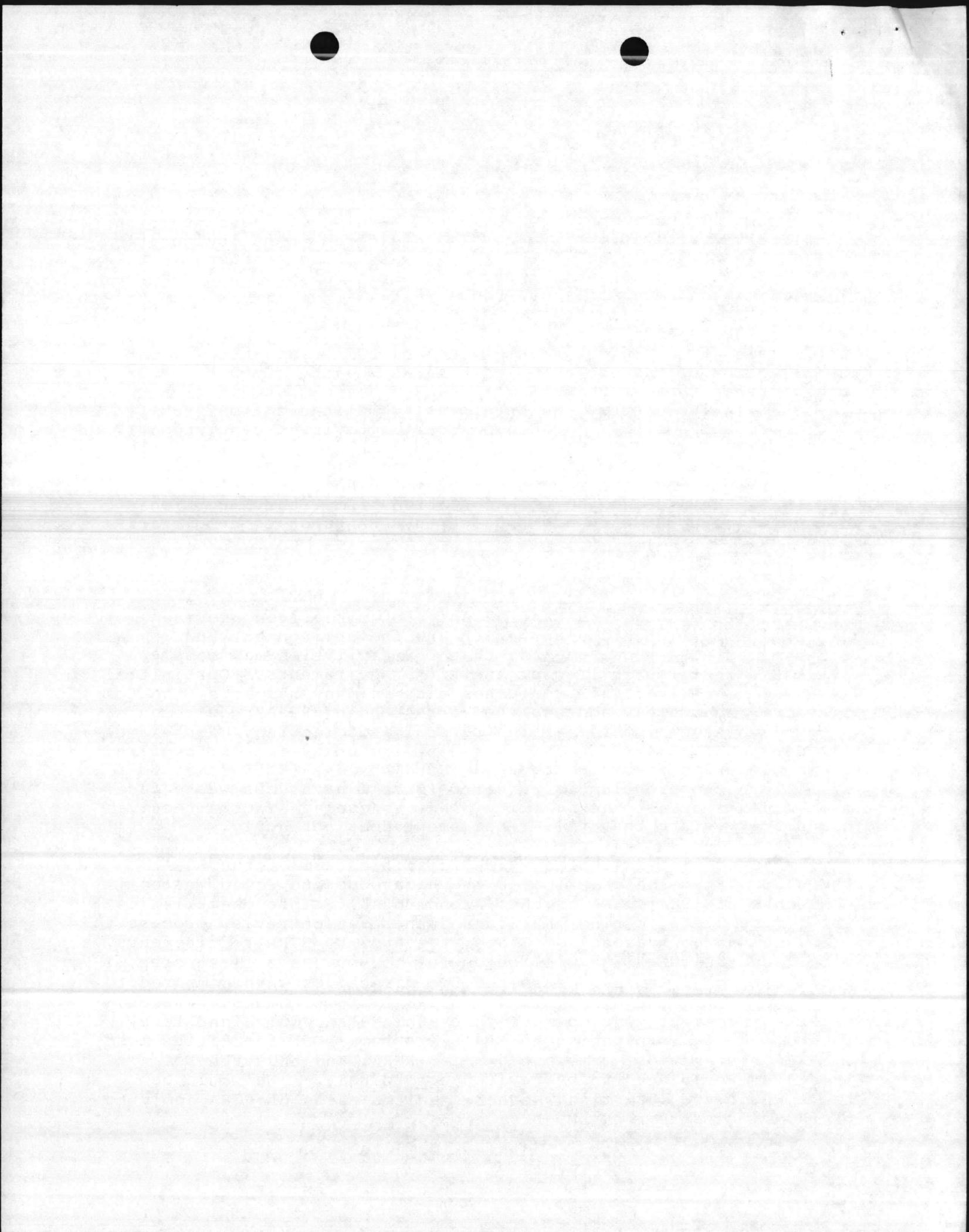
You should be aware, however, that burning of these munitions in military deactivation furnaces is considered to be incineration because the main purpose of the activity is waste treatment. Likewise, storage of these wastes prior to incineration would also be considered management of a hazardous waste.

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

RCRA Applicability to DoD

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

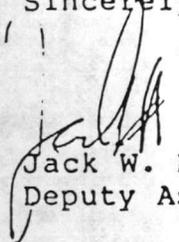
Enclosed is a checklist which identifies all of the RCRA regulations promulgated prior to the Hazardous and Solid Waste Amendments of 1984 (HSWA or the "Amendments"). This checklist is used by the States during the State authorization review process to determine the equivalency of State standards to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



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

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

Sincerely yours,



Jack W. McGraw
Deputy Assistant Administrator

Enclosure

ROUTING - REQUEST 13 May 87

- Please
- READ
 - HANDLE
 - APPROVE
- and
- FORWARD
 - RETURN
 - KEEP OR DISCARD
 - REVIEW WITH ME

To Danny
Can we make a change
to Hy wants order to
cover this?

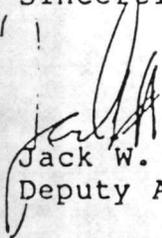
Date _____

From J W

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.

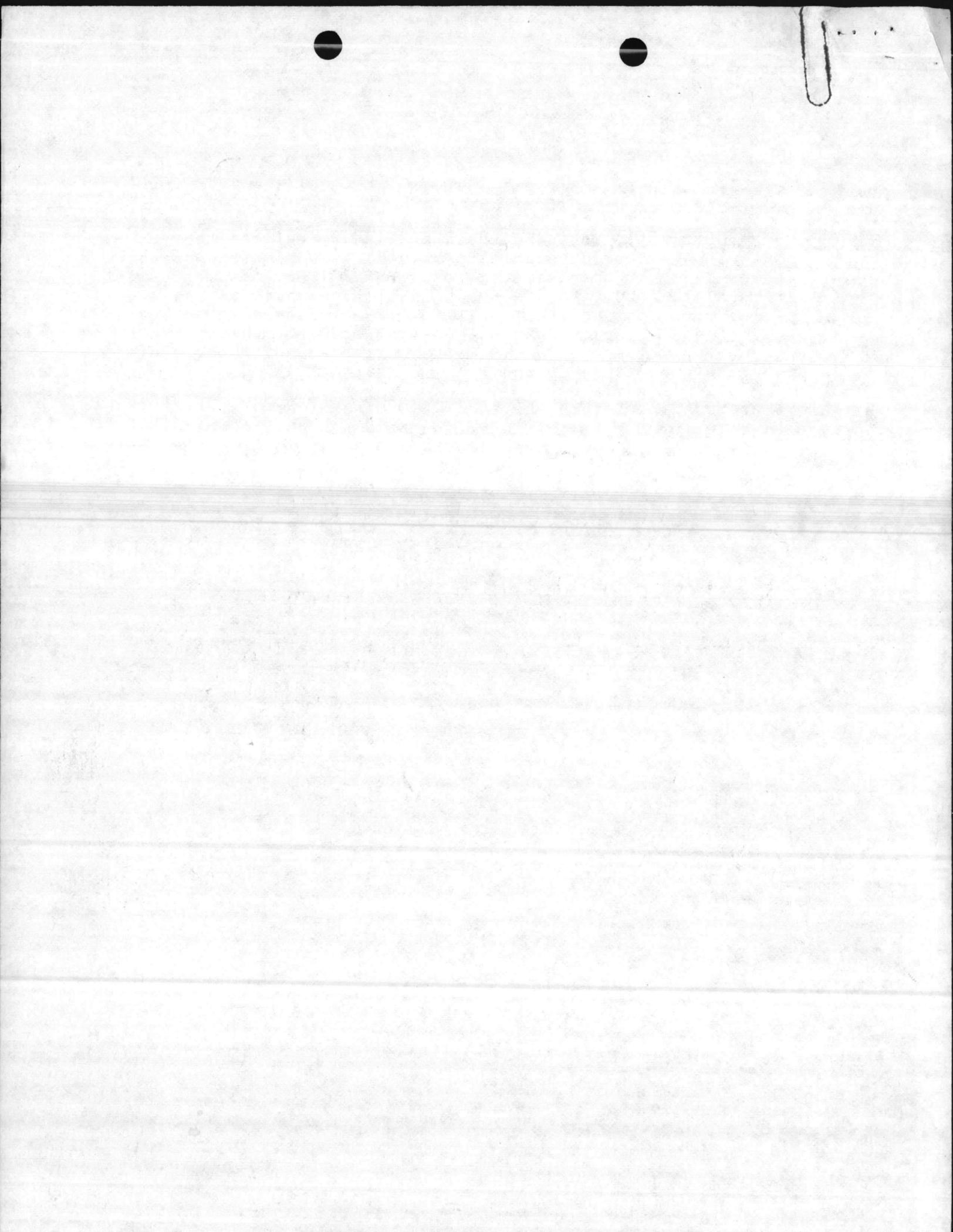
We are confident that the final DOD directives will facilitate the permitting of DOD facilities and should reduce the need for authorized States to impose requirements other than those prescribed in your current directives.

Sincerely yours,



Jack W. McGraw
Deputy Assistant Administrator

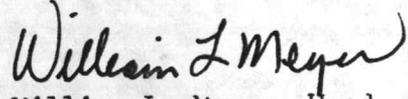
Enclosure



Colonel T.J. Dalzell
Page 2

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

Sincerely



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

WLM/pgb/6913A

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



1. 2. 3.

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

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

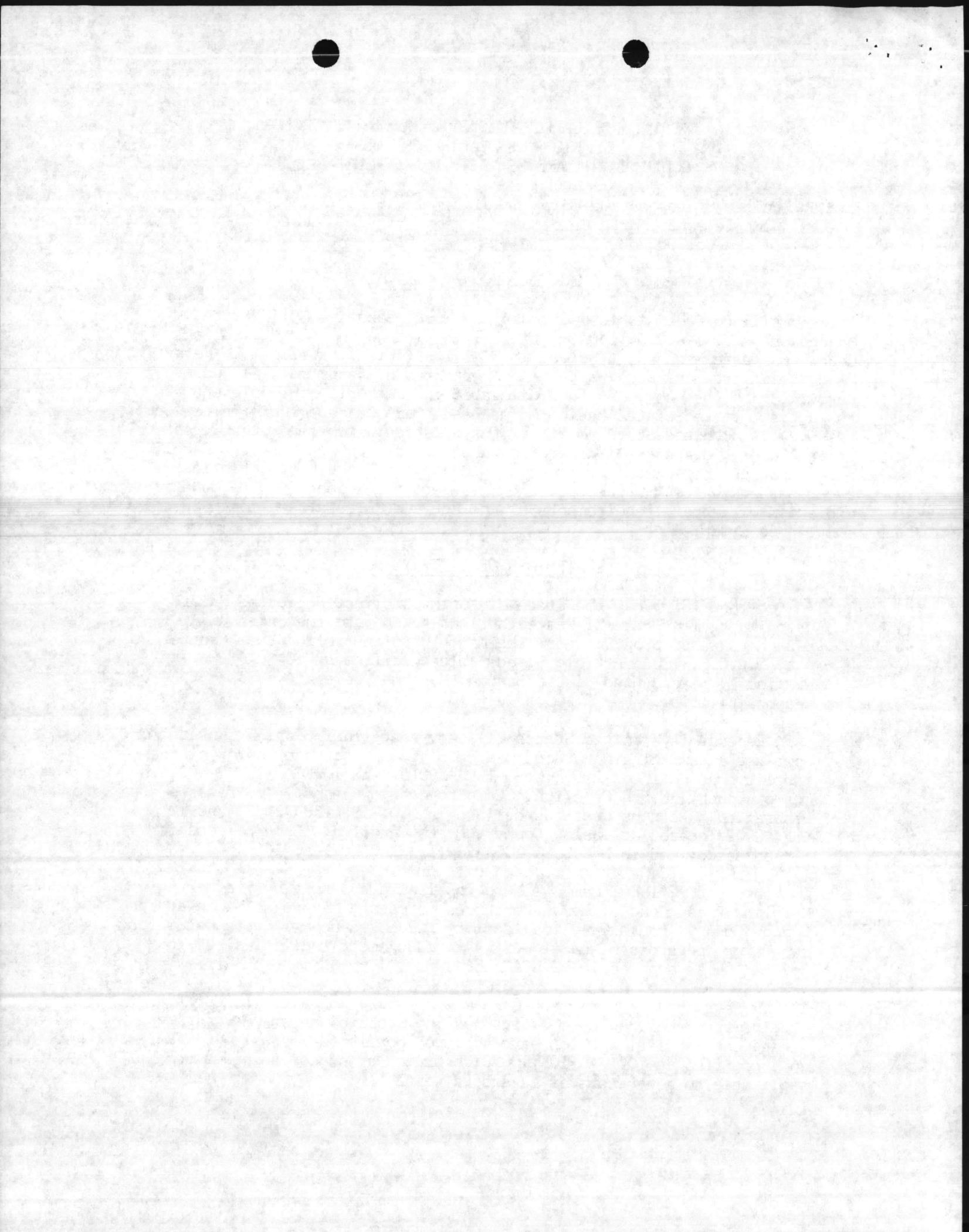
COMPLIANCE ORDER
Docket # 87-493

PRELIMINARY STATEMENT

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

STATEMENTS OF FACT AND LAW

1. On December 18, 1980, the State of North Carolina, Solid and Hazardous Waste Management Branch, was authorized to operate the State RCRA Hazardous waste program under the North Carolina Solid Waste Management Act, N.C.G.S. 130A, Article 9, and rules codified at 10 NCAC 10F. William L. Meyer, Head of the Branch, has been delegated those responsibilities.
2. Camp Lejeune is a United States Military installation which owns and/or operates an existing hazardous waste treatment, storage and/or disposal facility, as defined in N.C.G.S. 130A-290(5) and 10 NCAC 10F .0002, in Onslow County, North Carolina. Camp Lejeune owns and/or operates a site generating hazardous waste as defined in N.C.G.S. 130A-290-7 and 10 NCAC 10F .0002 located at Onslow County, North Carolina. Camp Lejeune is a person as defined in N.C.G.S. 130A-290(12) and 10 NCAC 10F .0002.
3. On September 7, 1984, Camp Lejeune was issued a permit by the North Carolina Department of Human Resources to manage hazardous waste at the Onslow County, North Carolina facility in accordance with standards for owners or operators of hazardous waste management facilities set forth in 40 CFR 264 as adopted in 10 NCAC 10F .0032.
4. 40 CFR Part 264, codified at 10 NCAC 10F .0032, contains standards and requirements applicable to owners and operators of hazardous waste management facilities which have achieved permitted status. 40 CFR Part 262, codified at 10 NCAC 10F .0030, contains standards and requirements applicable to generators of hazardous waste.



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

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

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

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

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

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

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

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

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

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

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



1. 1.

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

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

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

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

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

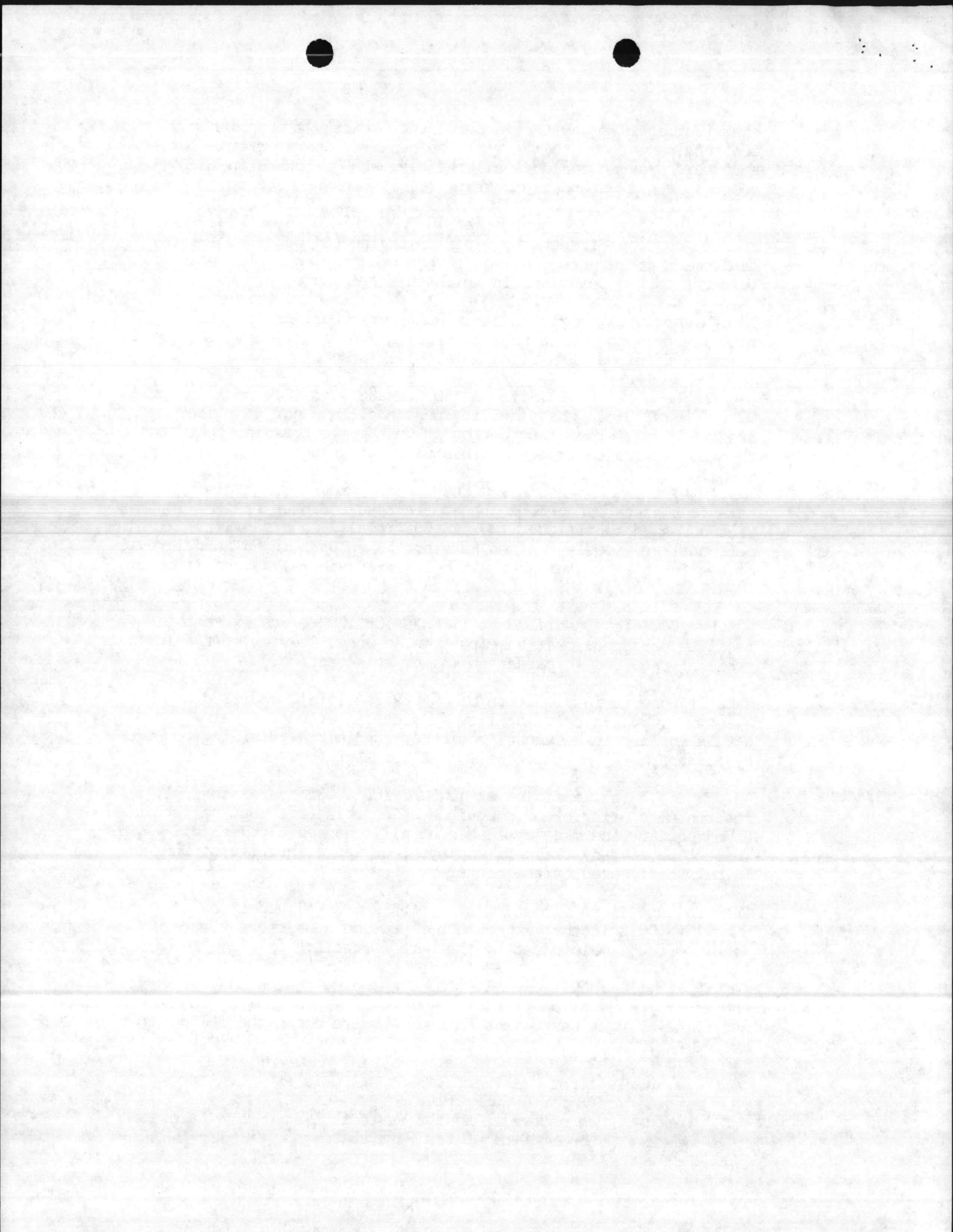
Camp Lejeune is in violation of 40 CFR 264.16(c), codified at 10 NCAC 10F .0032 in that facility personnel previously trained have not taken part in an annual review of the initial training required by paragraph (a) of this section at the storage area.

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

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

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

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



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

- c. If the waste is not listed as a hazardous waste in Subpart D of 40 CFR Part 261, he must determine whether the waste is identified in Subpart C of 40 CFR Part 261 by either:
1. Testing the waste according to the methods set forth in Subpart C of 40 CFR Part 261, or according to an equivalent method approved by the Administrator under 40 CFR 260.21; or
 2. Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

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

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

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

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

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

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

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



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

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

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

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

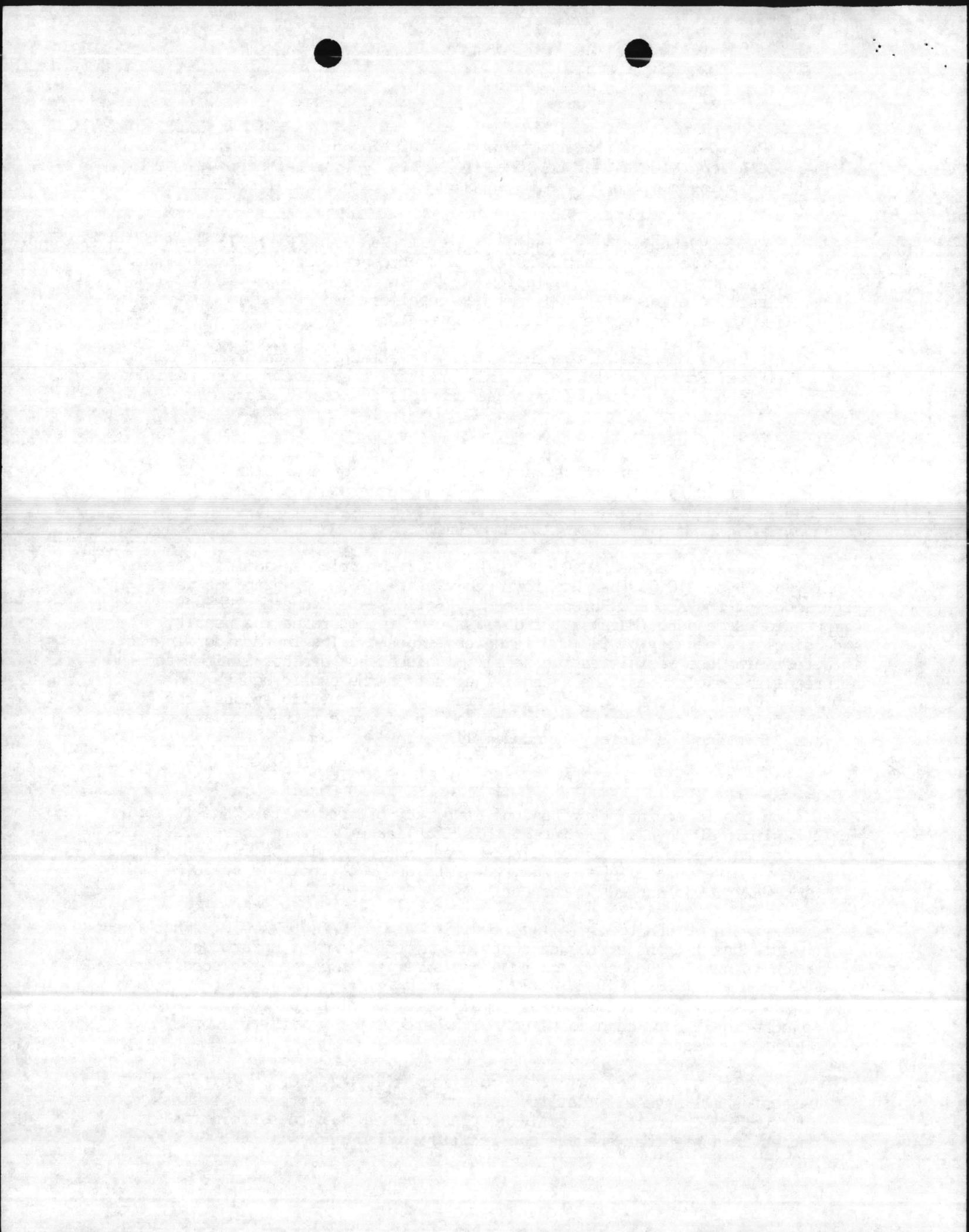
CIVIL PENALTY

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

CONDITIONS FOR CONTINUED OPERATION

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

1. Comply with 40 CFR 262.34(a)(1), codified at 10 NCAC 10F .0030. Camp Lejeune shall transfer the contents of any container of hazardous waste which is not in good condition to a container which is in good condition.
2. Comply with 40 CFR 262.34(a)(3), codified at 10 NCAC 10F .0030. Camp Lejeune shall mark each container of hazardous waste with the words "Hazardous Waste."
3. Comply with 40 CFR 262.34(a)(4), codified at 10 NCAC 10F .0030. Camp Lejeune shall have all facility personnel complete a program of class room instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the

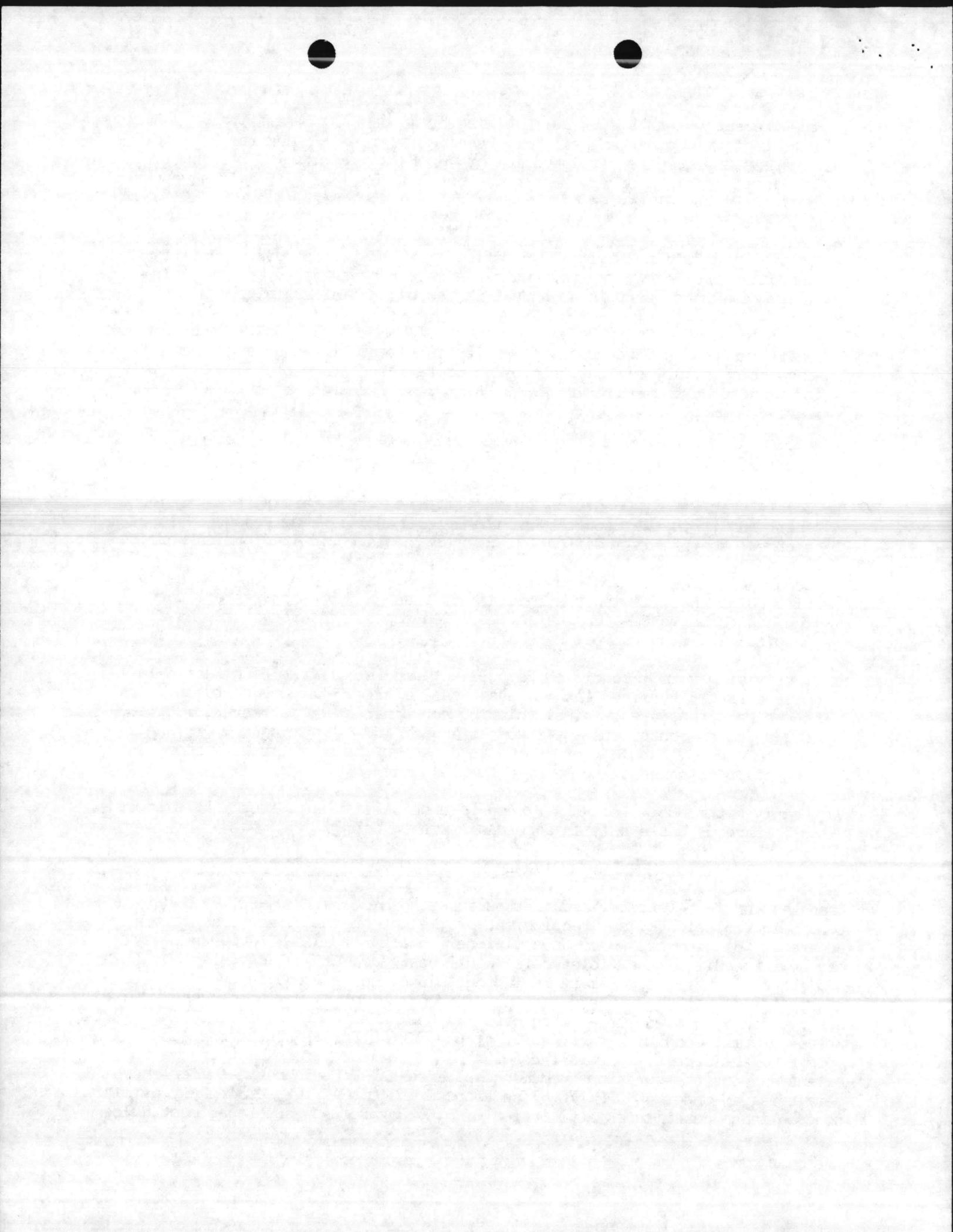


requirements of this part as specified by 40 CFR 256.16(a)(1). Personnel directing this program shall have received training in hazardous waste management procedures as specified by 40 CFR 265.16(a)(2). Personnel previously trained under the requirements of 262.34(a)(4) shall have taken part in an annual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

4. Comply with 40 CFR 264.16(c), codified at 10 NCAC 10F .0032. Facility personnel previously trained under the requirements of 40 CFR 264.16(a) shall have taken part in an annual review of initial training.
5. Comply with 40 CFR 264.74(a), codified at 10 NCAC 10F .0032. Camp Lejeune shall furnish upon request and make available at all reasonable times for inspection by any officer, employee, or representative of DHR who is duly designated by the Secretary all records required to be maintained by the Part B Permit.
6. Comply with 40 CFR 262.11, codified at 10 NCAC 10F .0030. Camp Lejeune shall determine if solid wastes it generates are hazardous waste.
7. Comply with Permit Condition Part I F of the Part B Permit. Camp Lejeune shall submit to the Secretary of the Department of Human Resources for approval and permit modification changes in plans required by its permit.
8. Comply with Permit Condition Part II L. 3 of the Part B Permit. The Base Fire Chief shall review the contingency plan and types of waste located in the hazardous waste storage facility with representatives of the Naval Hospital and Base Provost Marshall.
9. Comply with Permit Condition Part III C. and Permit Condition Part D-1a(1) of the Part B Permit. Camp Lejeune shall manage hazardous waste only in containers that are original shipping containers for that material or in a DOT-approved containers as listed in 49 CFR 100. These containers shall not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.
10. Comply with 3005(a) of RCRA. Camp Lejeune shall treat, store, or dispose of hazardous waste only in accordance with a permit.

POTENTIAL CONSEQUENCES OF FAILURE TO COMPLY

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



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

OPPORTUNITY TO REQUEST A HEARING

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

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

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

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

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

INFORMAL CONFERENCE

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

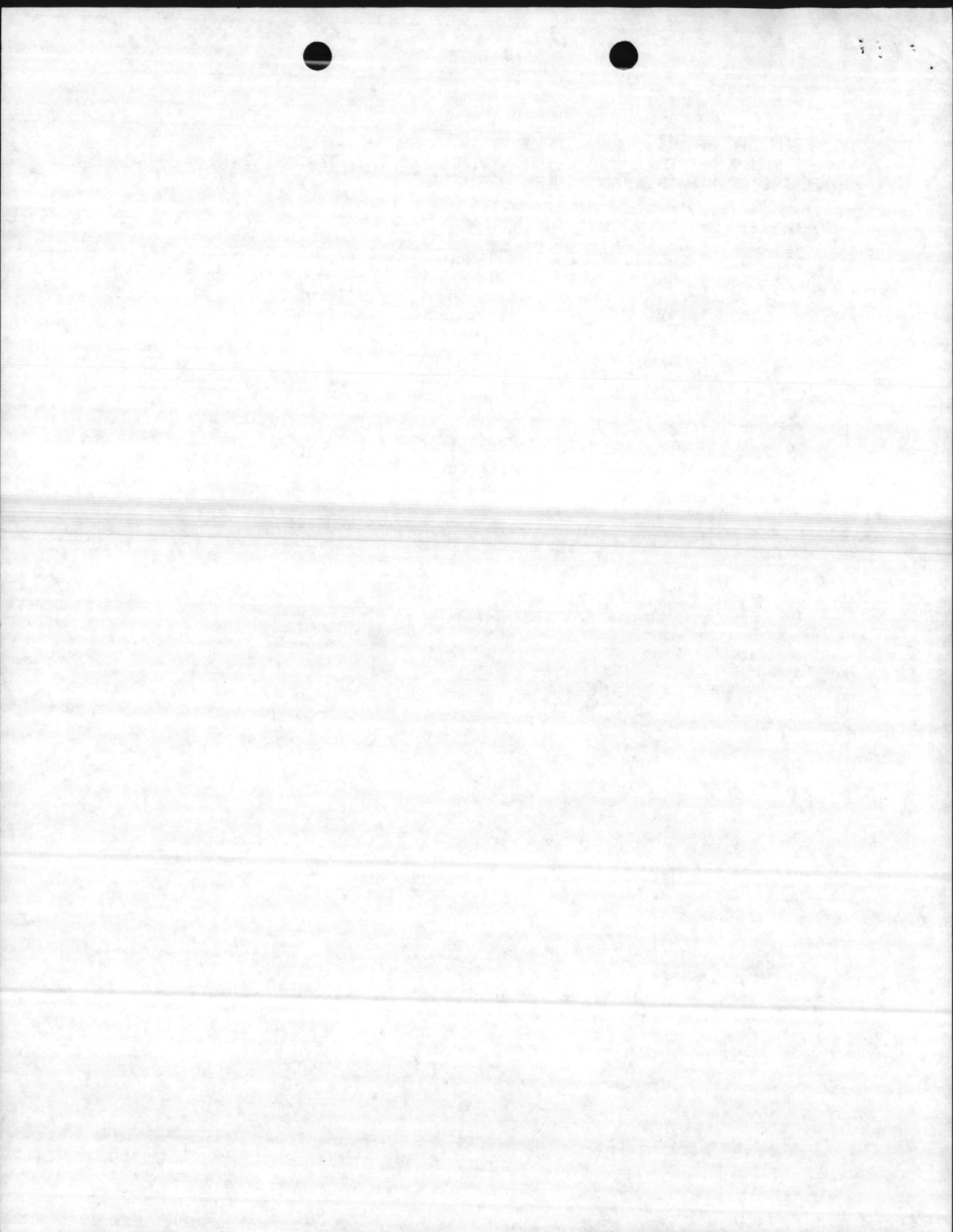
Dr. Carol M. Schiller, Branch Attorney
Solid and Hazardous Waste Management Branch
P. O. Box 2091, 306 N. Wilmington Street
Raleigh, N. C. 27602-2091
(919) 733-2178



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

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

Date: 9/11/97

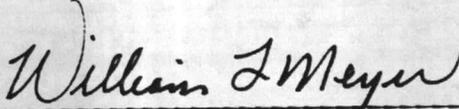


CERTIFICATE OF SERVICE

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

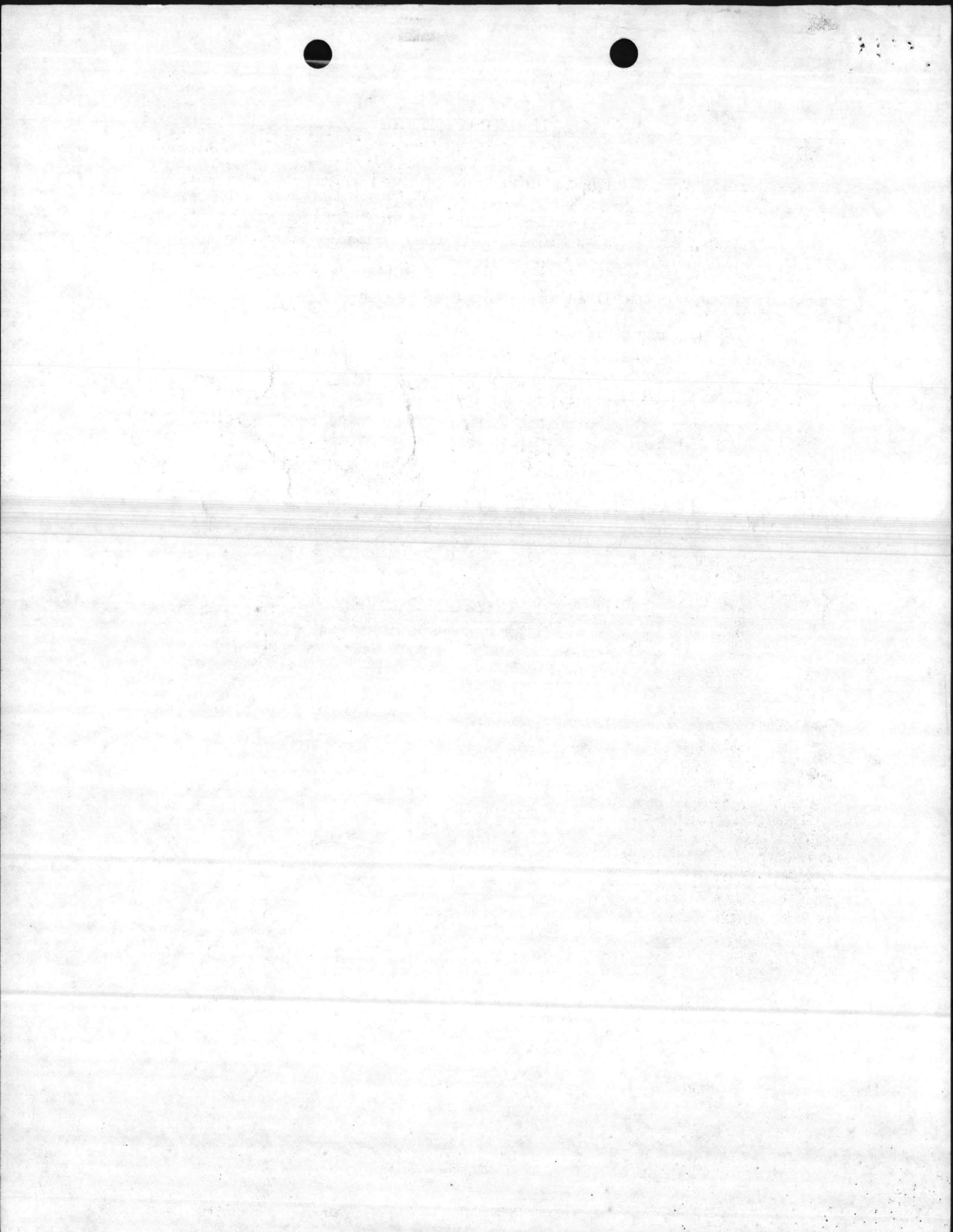
Colonel T.J. Dalzell
Assistant Chief of Staff, Facilities
United States Marine Corps Base
Camp Lejeune, North Carolina

Dated this 11th day of August, 1987.



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

6913A



6240
NREAD
1 Oct 87

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

Subj: TRAINING FOR HAZARDOUS MATERIAL DISPOSAL OFFICERS AND
HANDLERS

Ref: (a) BO 6240.5A

Encl: (1) HMDO's for MCB

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

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

C. D. PETERSON
Acting

Distribution:

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

10/1
HMDC



ST. LOUIS, MO., FEBRUARY 10, 1900.

Dear Sir:

I have the honor to acknowledge the receipt of your letter of the 7th inst.

in relation to the matter mentioned therein, and in reply to inform you that the same has been forwarded to the proper authorities for their consideration.

I am, Sir, very respectfully,
 Yours truly,
 J. H. [Name]

Very truly yours,
 J. H. [Name]

Enclosed for you are the following documents:

- 1. A copy of the report of the committee on the subject of the proposed amendment to the constitution of the State of Missouri.
- 2. A copy of the report of the committee on the subject of the proposed amendment to the constitution of the State of Missouri.
- 3. A copy of the report of the committee on the subject of the proposed amendment to the constitution of the State of Missouri.

I am, Sir, very respectfully,
 Yours truly,
 J. H. [Name]

Very truly yours,
 J. H. [Name]

I am, Sir, very respectfully,
 Yours truly,
 J. H. [Name]

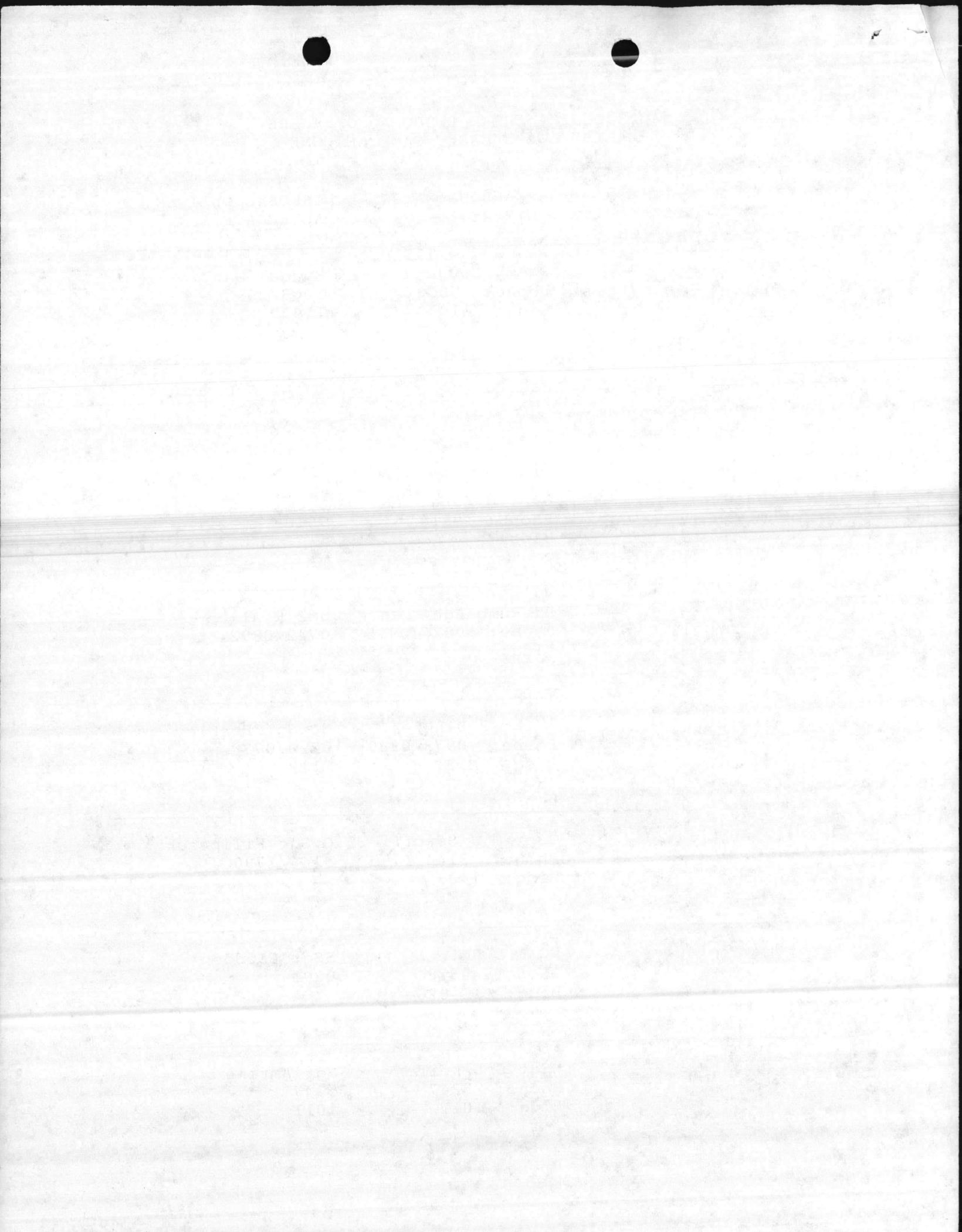
Very truly yours,
 J. H. [Name]

I am, Sir, very respectfully,
 Yours truly,
 J. H. [Name]

Very truly yours,
 J. H. [Name]

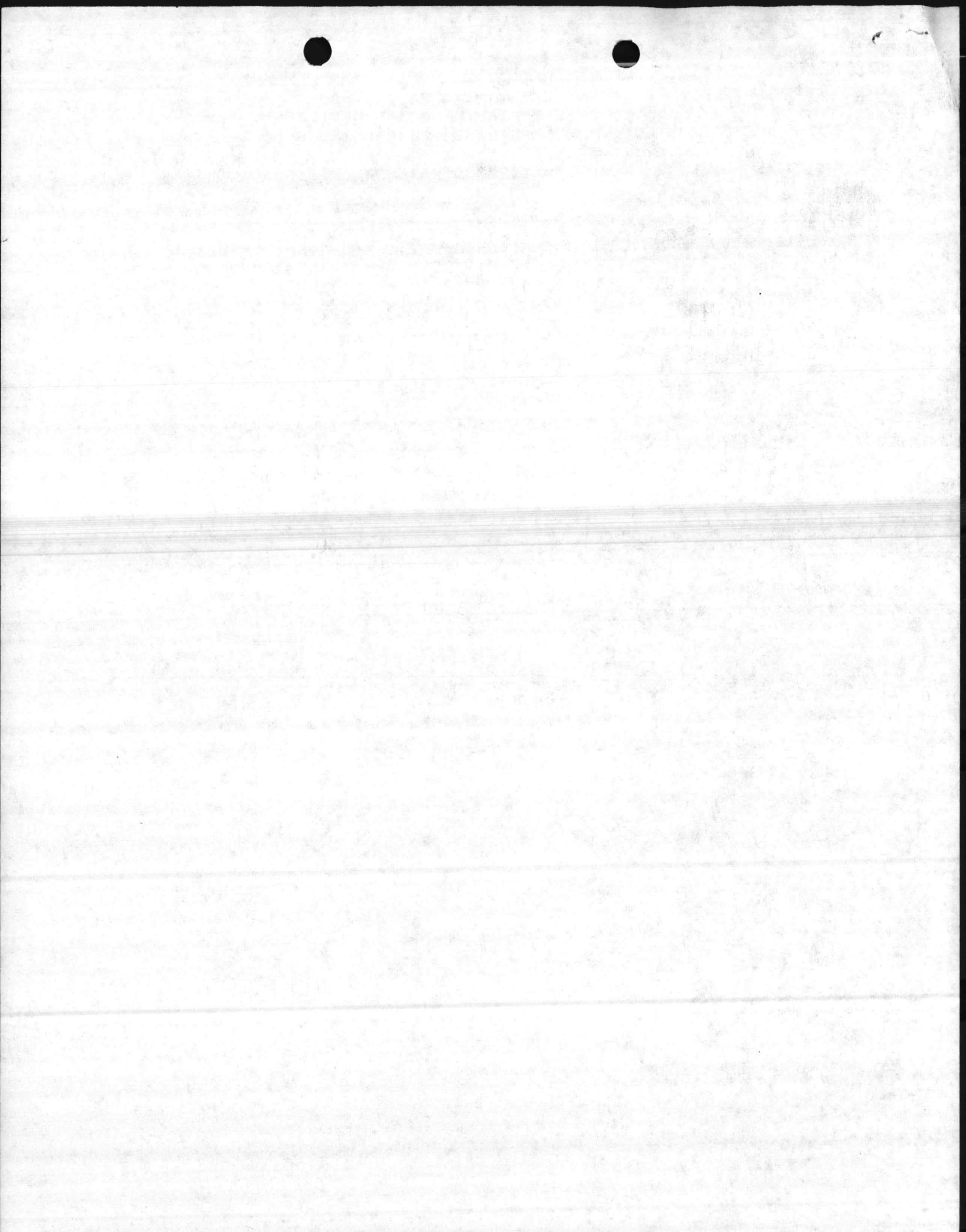
HAZARDOUS MATERIAL DISPOSAL OFFICERS
MARINE CORPS BASE, CAMP LEJEUNE

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



HAZARDOUS MATERIAL DISPOSAL OFFICERS
MARINE CORPS BASE, CAMP LEJEUNE

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



6240
NREAD

30 Sep 87

Base Hazardous Material Disposal Coordinator, (HMDC), Natural Resources & Environmental Affairs Division, Marine Corps Base, Camp Lejeune
Hazardous Material Disposal Officer, (HMDO), Base Maintenance Division, Marine Corps Base, Camp Lejeune

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

CONTENTS OF ABOVE GROUND OIL TANK AT BUILDING M-625

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

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

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

SAMMY GWYNN

Copy to:
Dir, NREAD
Supvy Ecologist

1944

Page 2

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6240
NREAD
30 Sep 87

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

Subj: EPA HAZARDOUS WASTE (HW) REINSPECTION

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

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

J. I. WOOTEN

DDJ
Supply Ecol.

File Hay Waste

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

29 Sept 87
Date

From: Director

To:

~~Dan~~ DDS

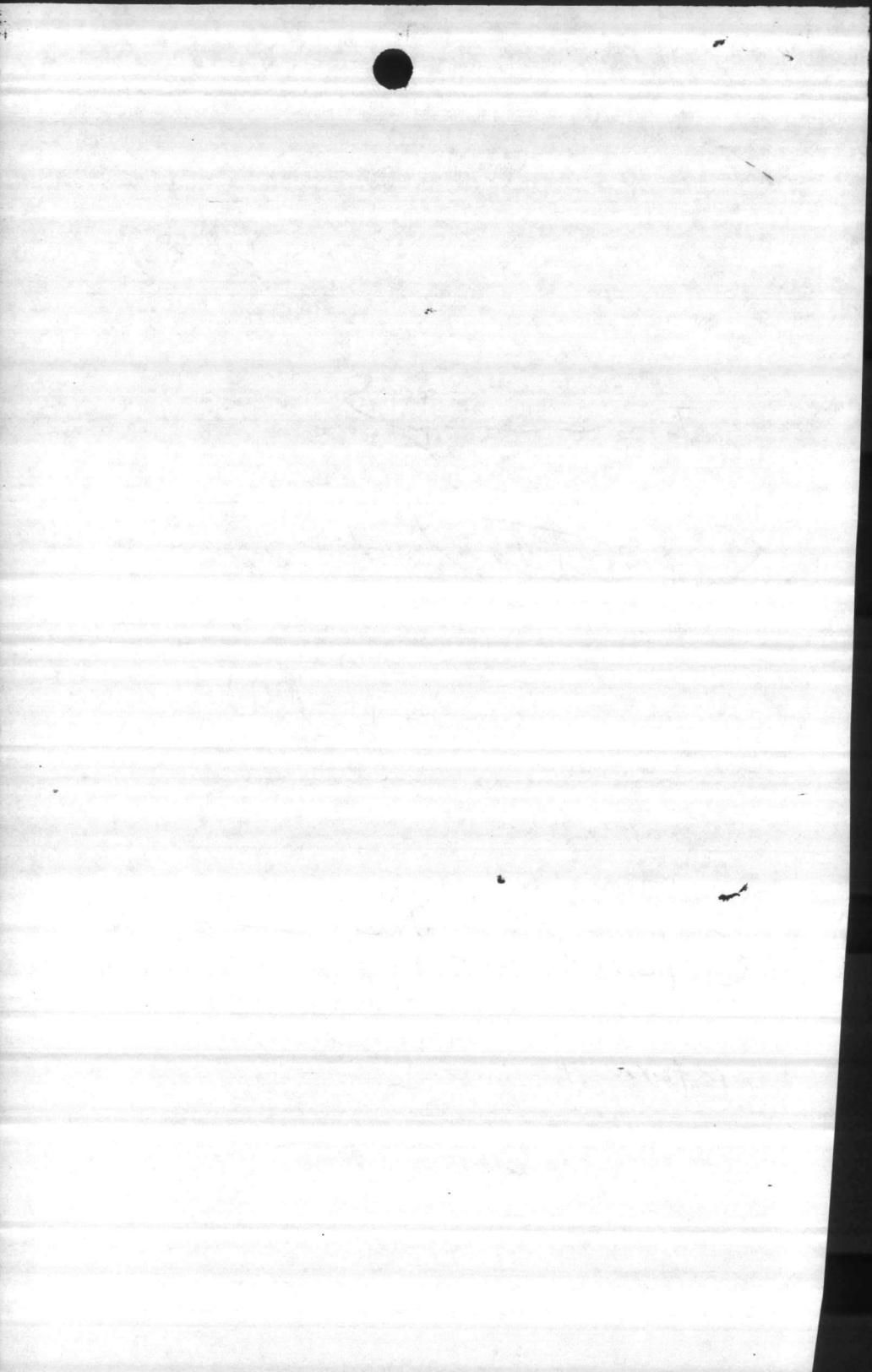
Subj:

See attached :

JLW

Glenice gle

return to JLW





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

See Make copy for MCB
NEEA
BWR

RECEIVED
11 SEP 1987

EOD
10 Sep 87

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

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

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

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

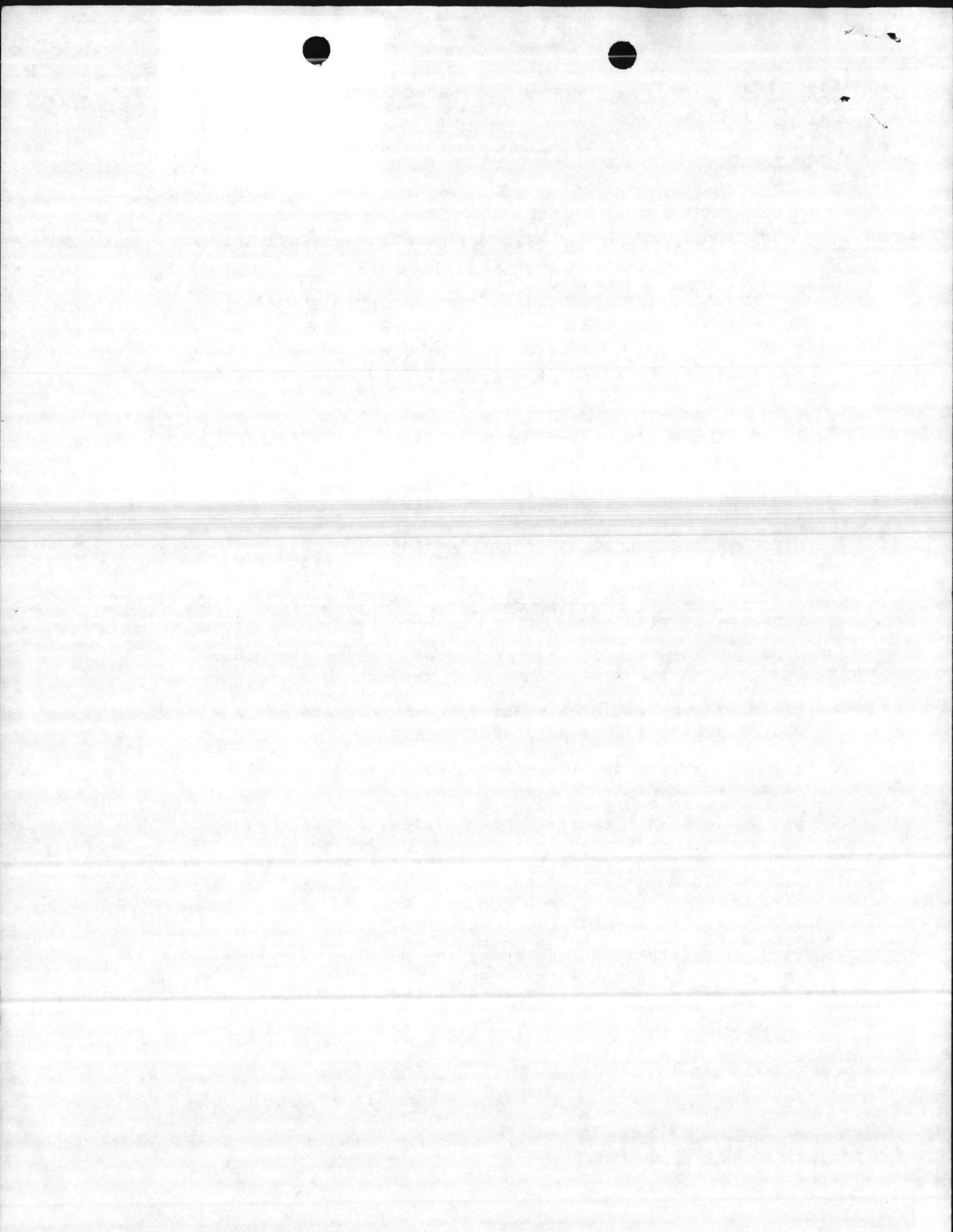
2. At this meeting the subject of disposal of unserviceable ammunition was raised. Presently, it is believed by Mr. Wooten and myself that a state permit will be required in order to conduct future operations. Mr. Wooten informed me that guidance will be forthcoming from the EPA or CMC on this subject.

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

- a. Does disposal of explosive items recovered by EOD personnel, off base require a permit?
- b. Is a permit required to transport explosive items that are recovered off base?
- c. Ammunition fired into high explosive impact areas, that does not function as designed, is periodically cleared. This clearance involves countercharging the items with a small amount of C-4 High Explosives. Will a permit be required for this?

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

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





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

RECEIVED
11 SEP 1987
IN REPLY REFER TO:

4570
EOD

10 Sep 87

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

Subj: NORTH CAROLINA ENVIRONMENTAL PROTECTION AGENCY (EPA)
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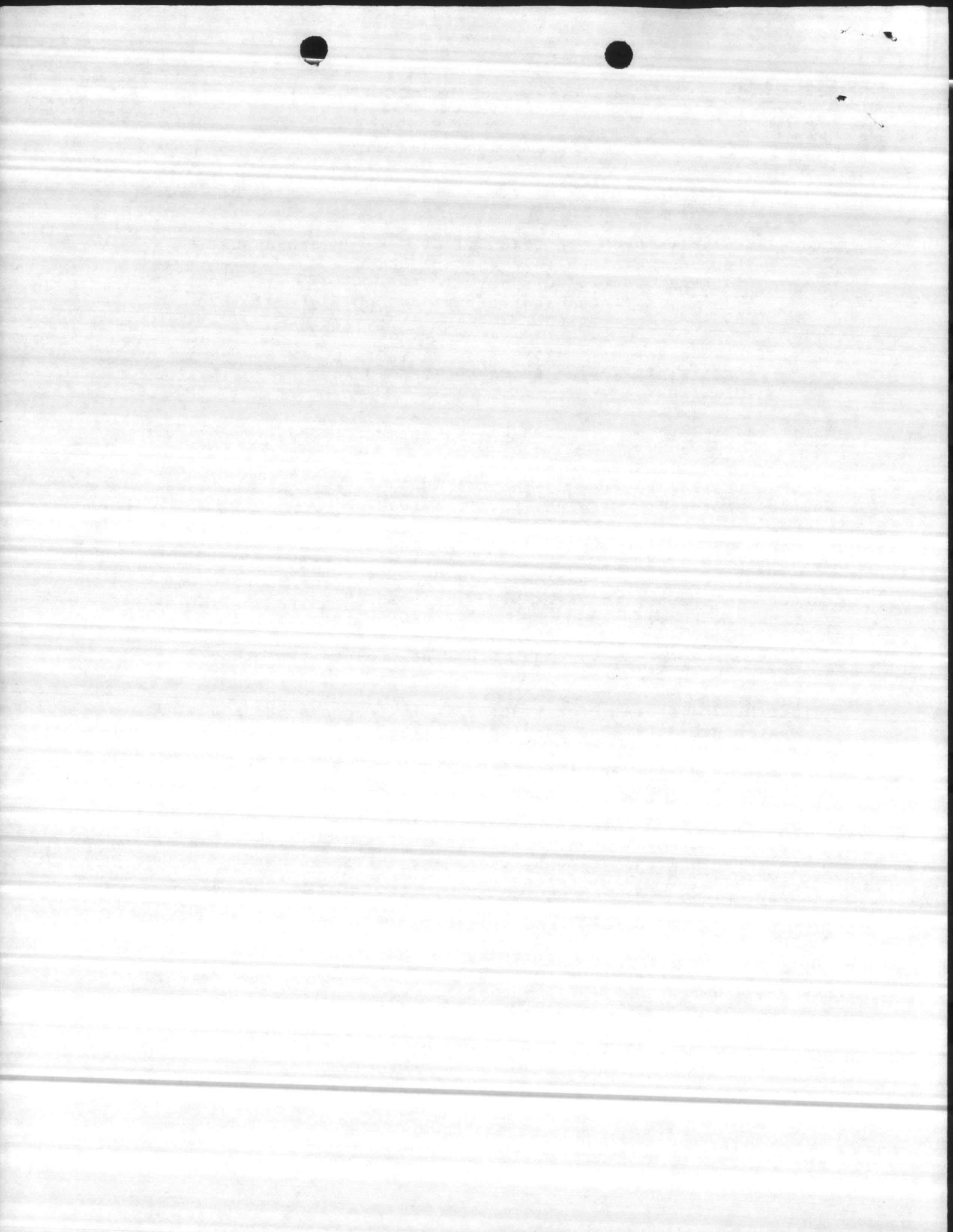
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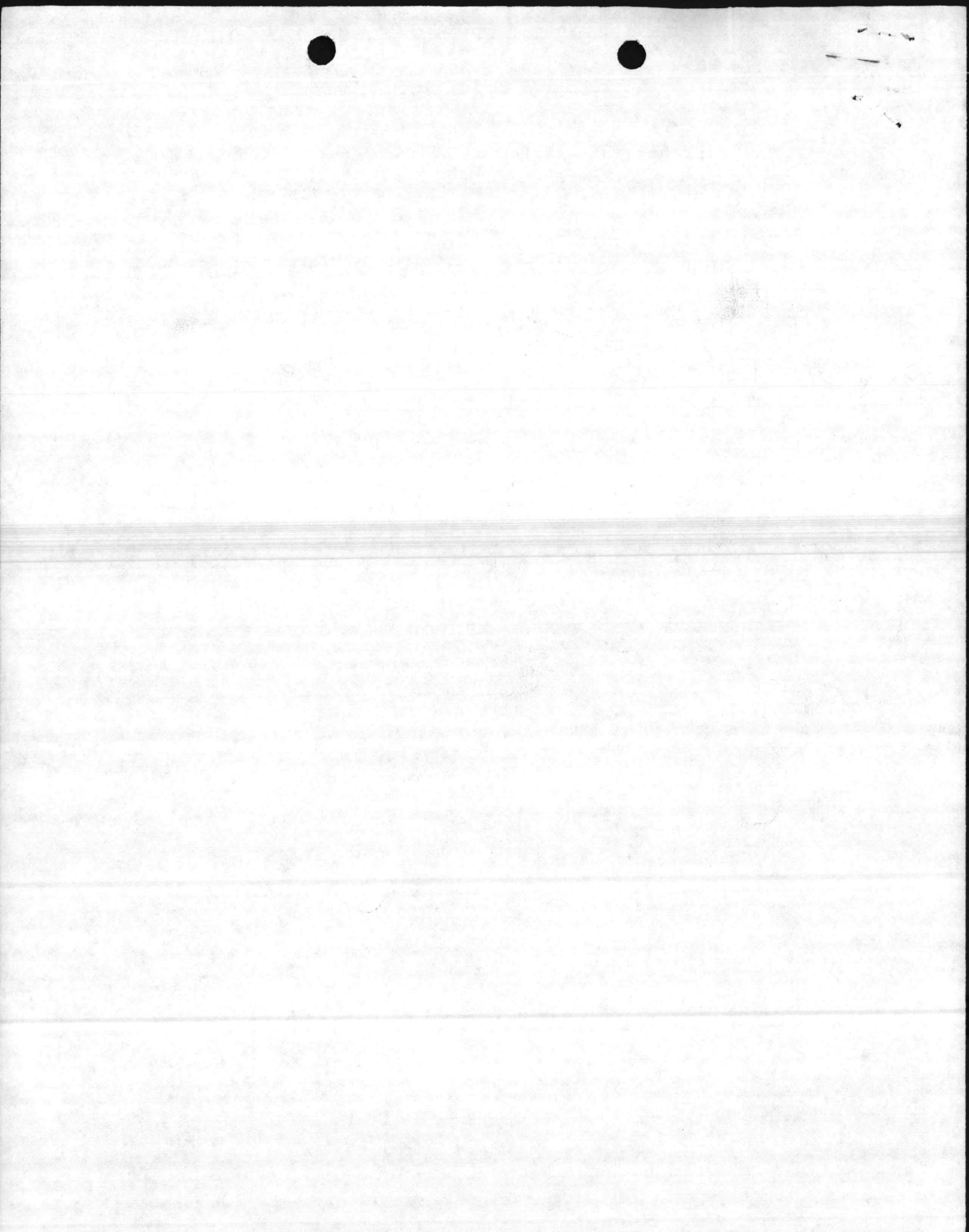
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5. Assistance in obtaining interim guidance in the aforementioned areas would be greatly appreciated.



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

R W
R. WAY



Memorandum

DATE: 29 Sep 87

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

TO: Supvy Ecologist, Environmental Branch, NREAD

SUBJECT: SOIL SAMPLE FROM BATTERY STORAGE AT BLDG 902

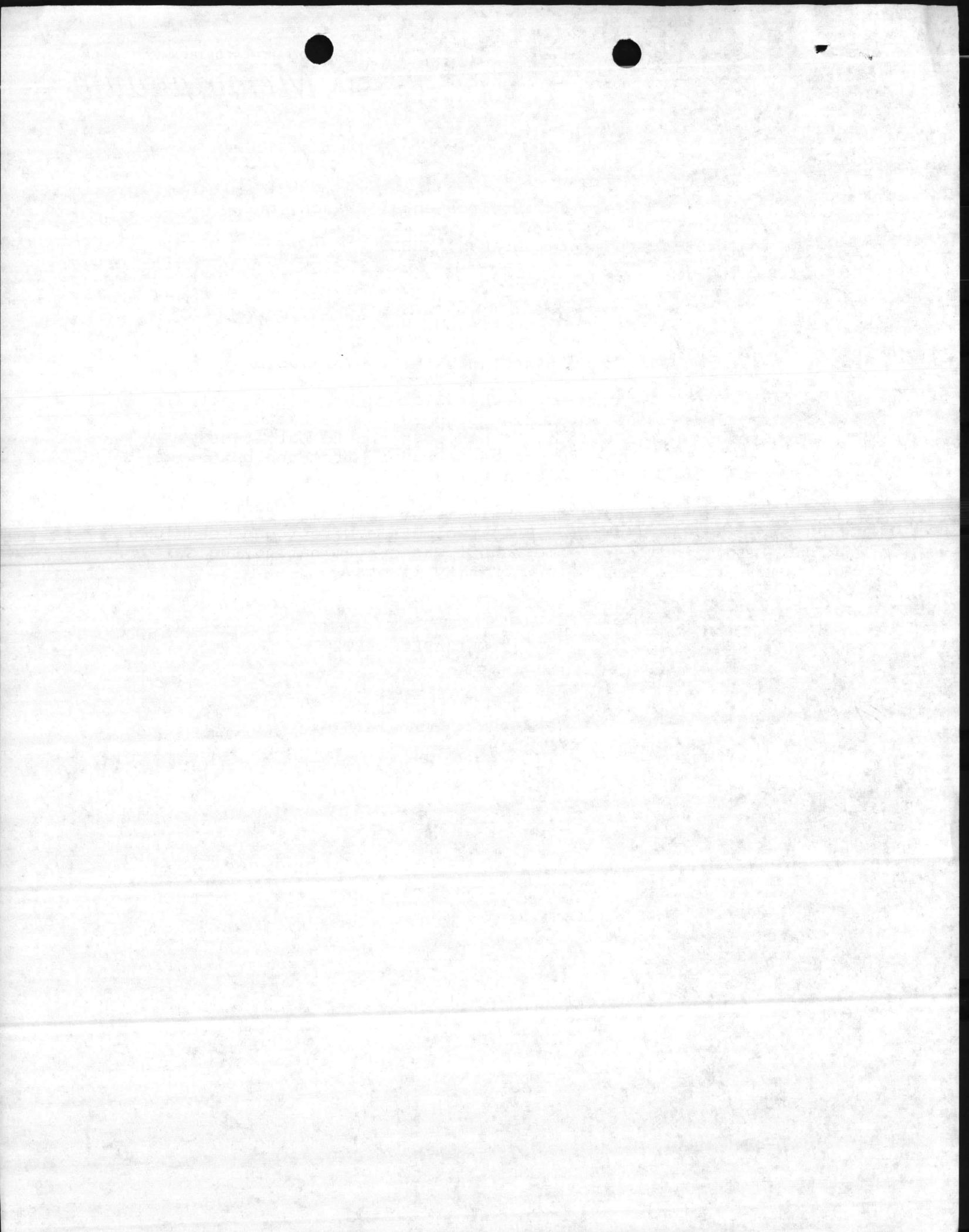
REFERENCE: (1) JTC Environmental Consultants, Rept # 86-673 (Table 1)

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

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

ELIZABETH BETZ

Copy to:
Dir, NREAD



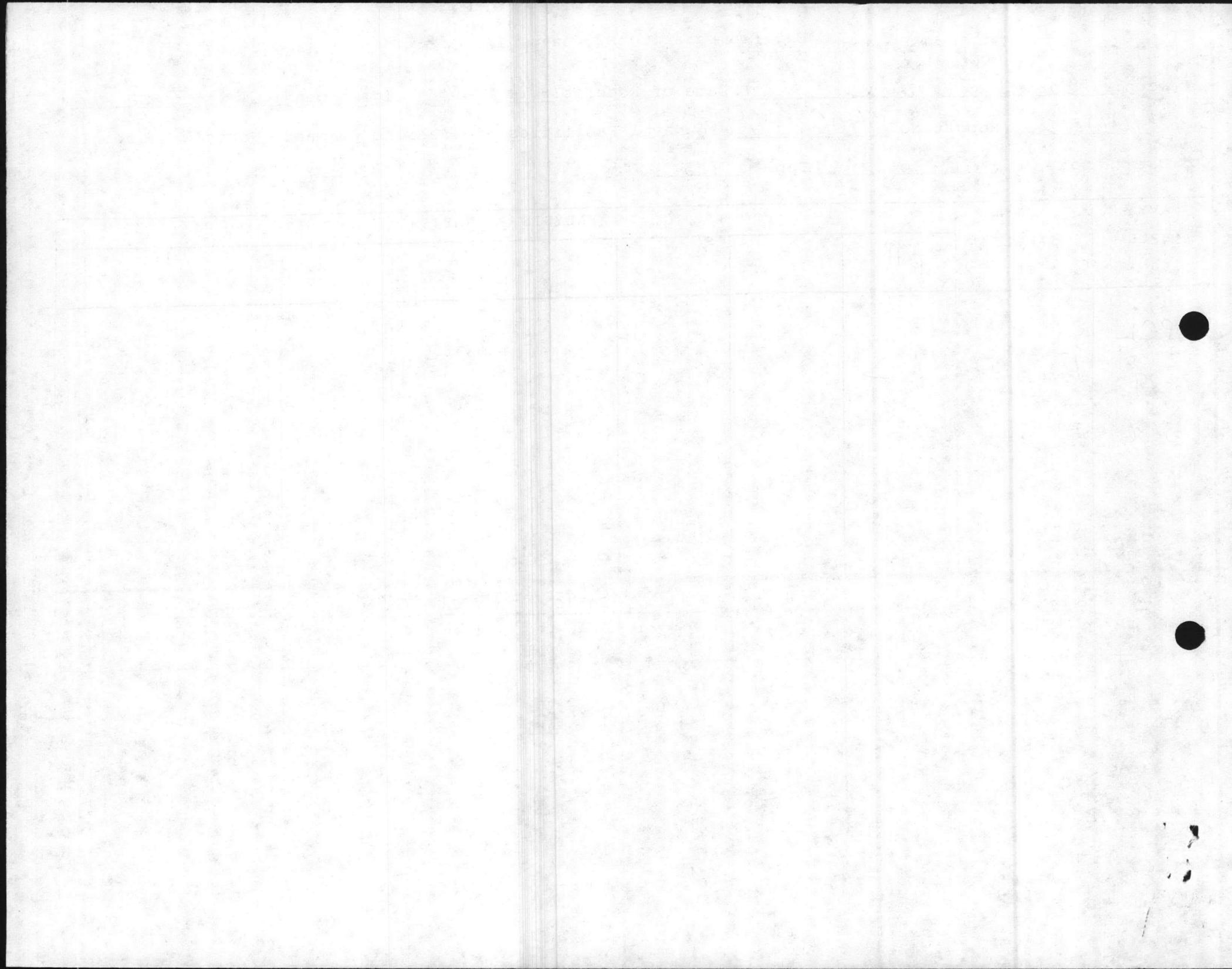
JTC Environmental Consultants, Inc.

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

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

JTC Data Report No. 86-673 Table 1

NAVY SAMPLE ID	JTC SAMPLE ID	ANALYSIS PARAMETER							
		pH							
● BCL 86-29 9-5-86	12-3667	7.2							
NAVY SAMPLE ID	JTC SAMPLE ID	EP Tox Extraction							
		As ug/L	Ba ug/L	Cd ug/L	Cr ug/L	Pb ug/L	Hg	Se ug/L	Ag ug/L
● MCBCL 86-29 9-5-86	12-3667	<150	<200	11	<10	70	<0.2	<200	<10



DD5

Glenn *gle*

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 9-24-87

TO:

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

ATTN: Mr Sharpe

1. Attached is forwarded for info/action. *Copy provided A/S Logistics for action.*

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

3. Your file copy.

File
JLW
Hq Waste
9-28-87

B. W. Elder
by dir

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



13-15-0

13-15-0

13-15-0

13-15-0

13-15-0

13-15-0



UNITED STATES MARINE CORPS

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

IN REPLY REFER TO:
6240
GSO
24 Sep 87

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

Subj: TRANSPORTATION OF HAZARDOUS WASTE

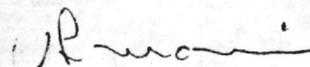
Ref: (a) BO 6240.5A
(b) CO, MCAS ltr 6280 GSO of 30 Jul 87
(c) CO, MCAS ltr 6280 GSO of 26 Aug 87
(d) Phonecon between Harold Norris, TMO, and Mary Wheat, this Command,
on 16 Sep 87

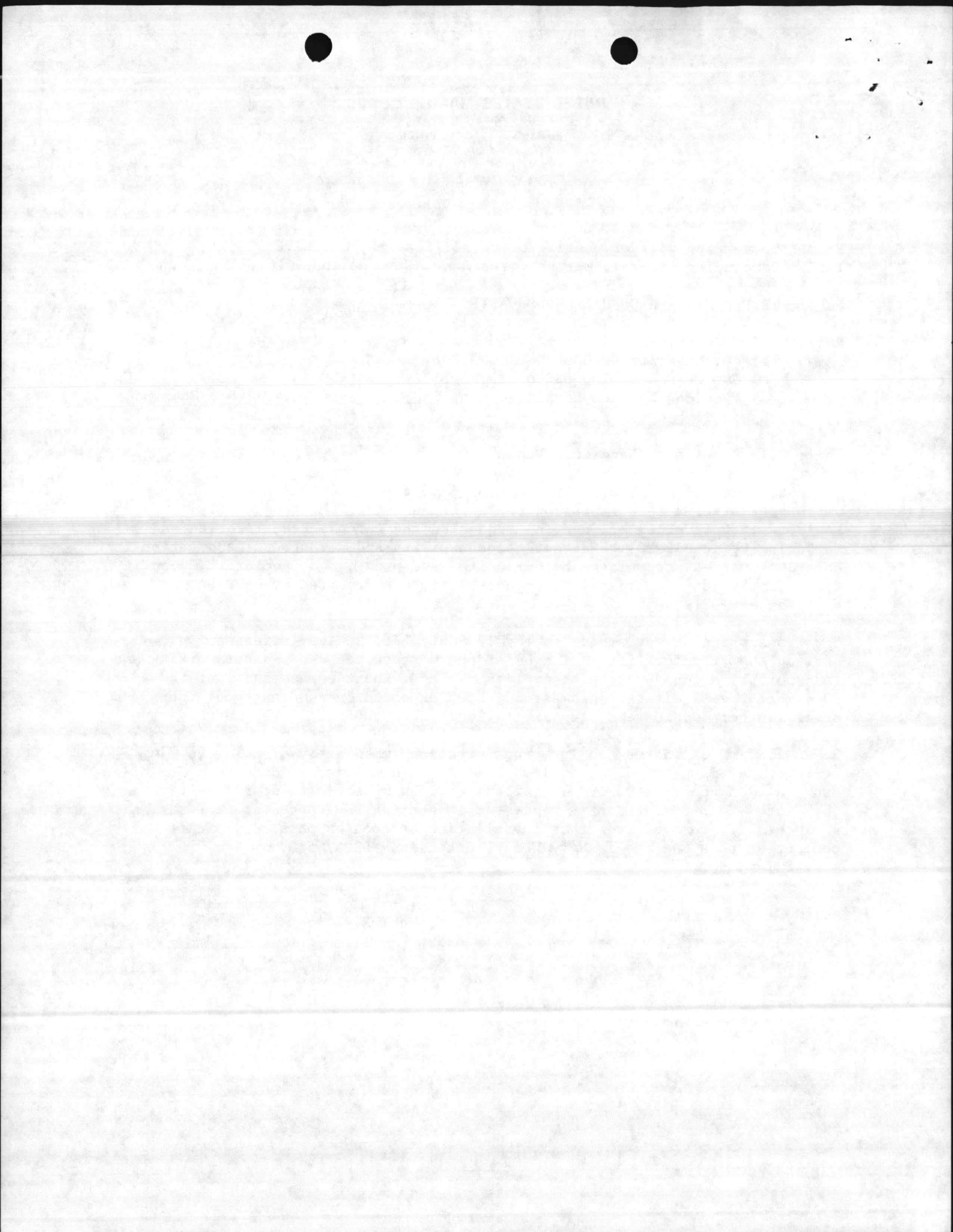
Encl: (1) Listing of Hazardous Waste

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

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

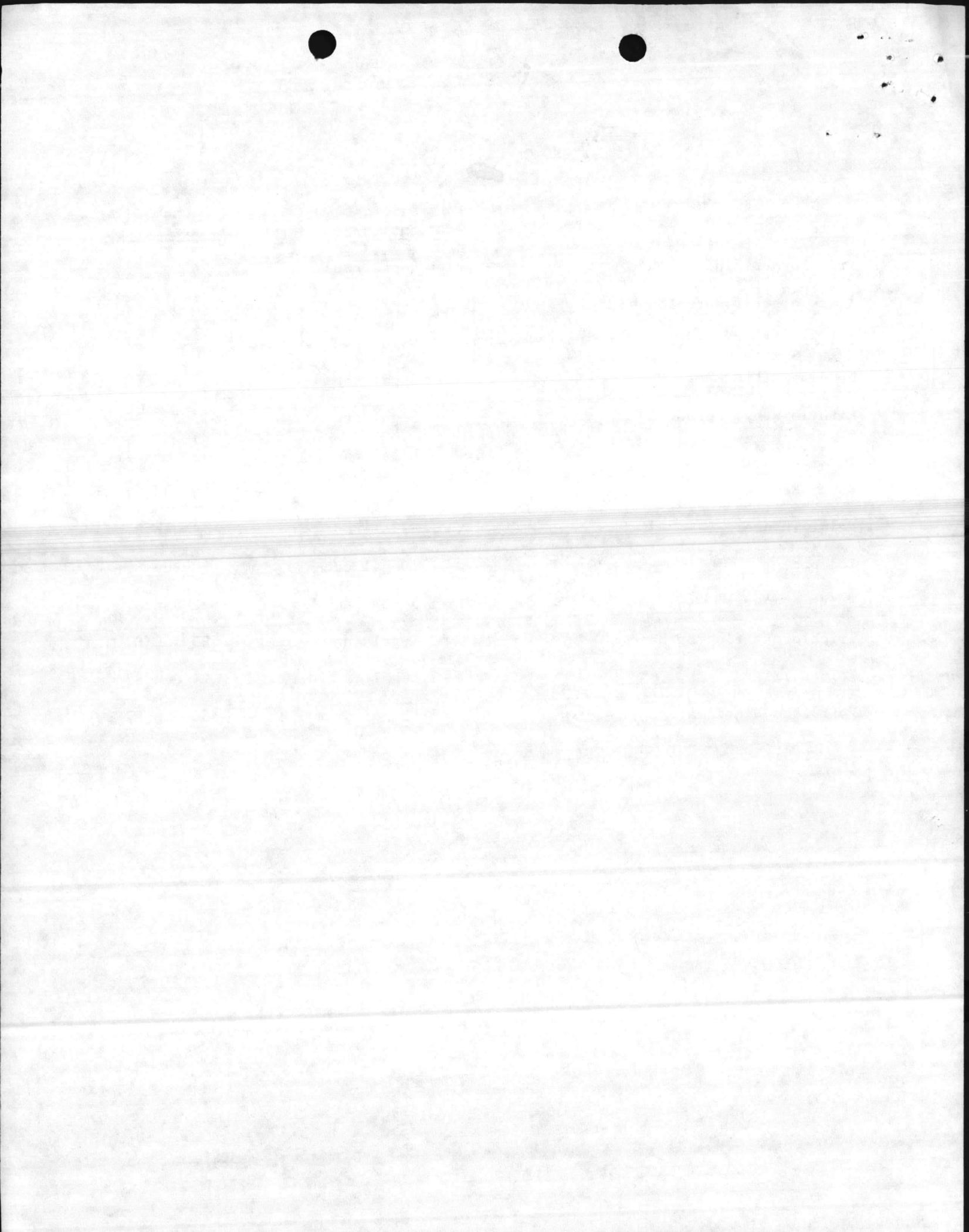
3. A listing of wastes needing transportation immediately or prior to 30 September is provided as enclosure (1). With the exception of one 55-gallon drum, all the containers are 10-gallons or less in size and do not require a forklift. Your assistance is requested in getting the wastes itemized in enclosure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

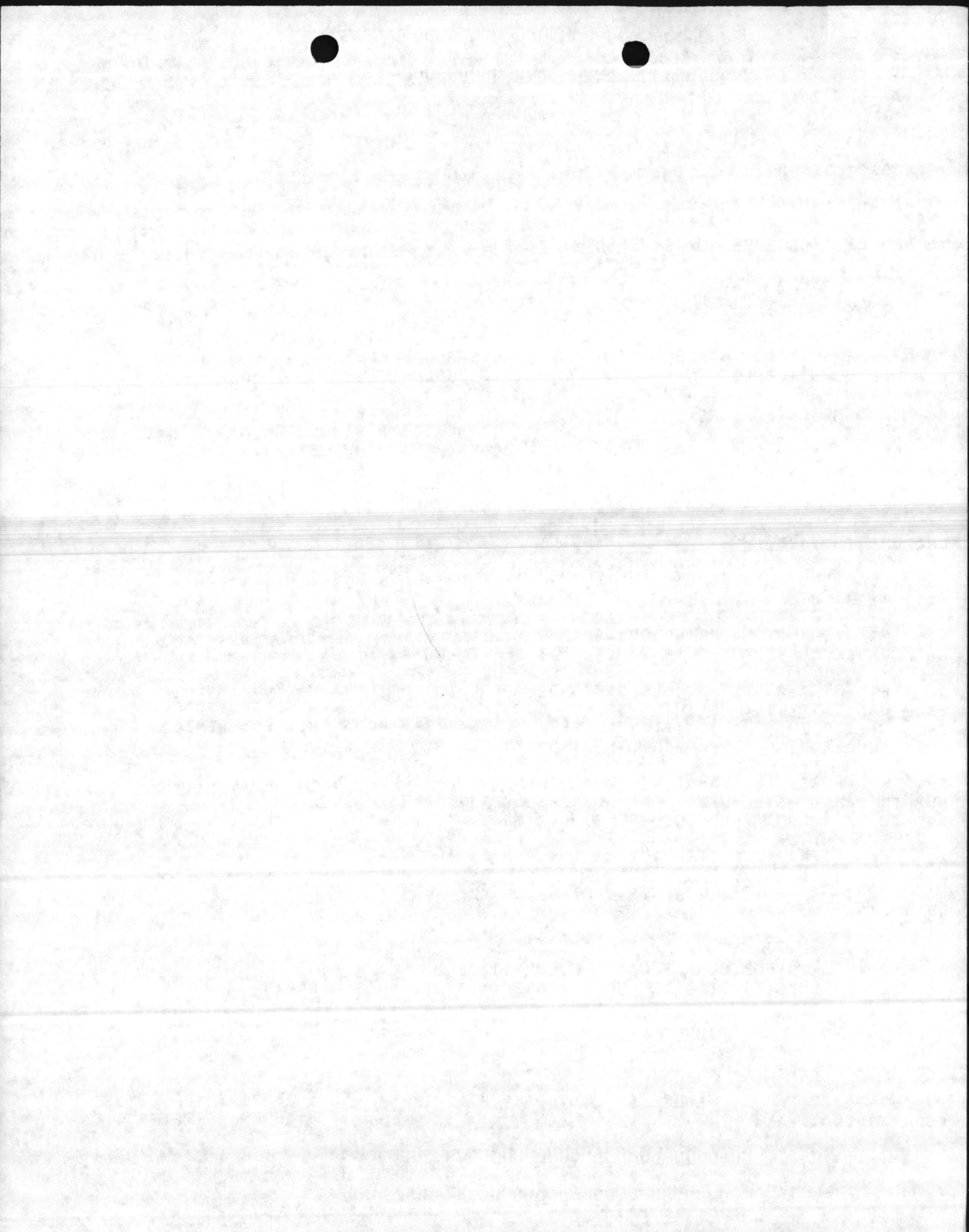

V. L. McMINN
Acting



LISTING OF HAZARDOUS WASTE

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





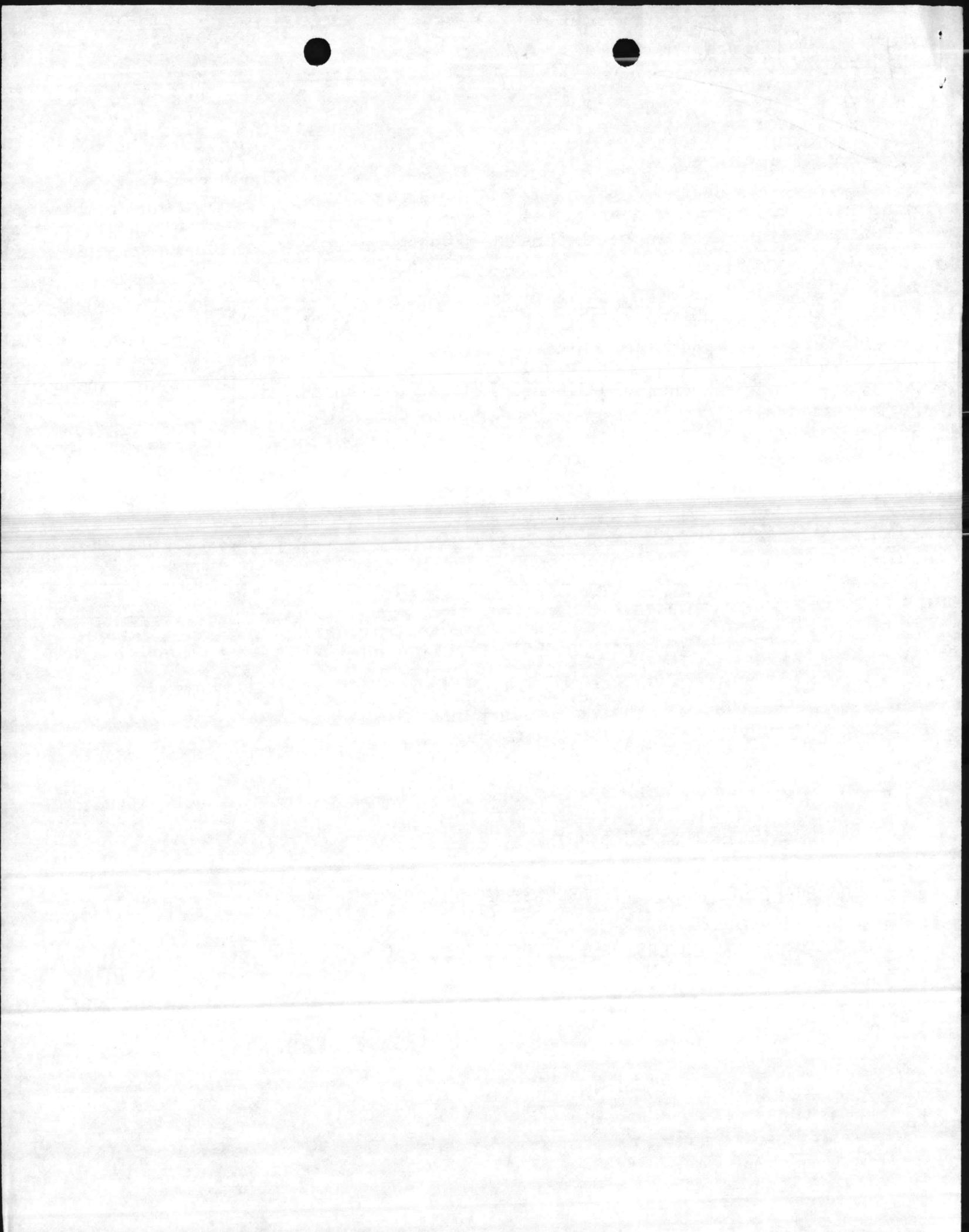
Haz Waste • File

CLEANUP PROGRAMS

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

RCRA CORRECTIVE ACTION PROGRAM

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

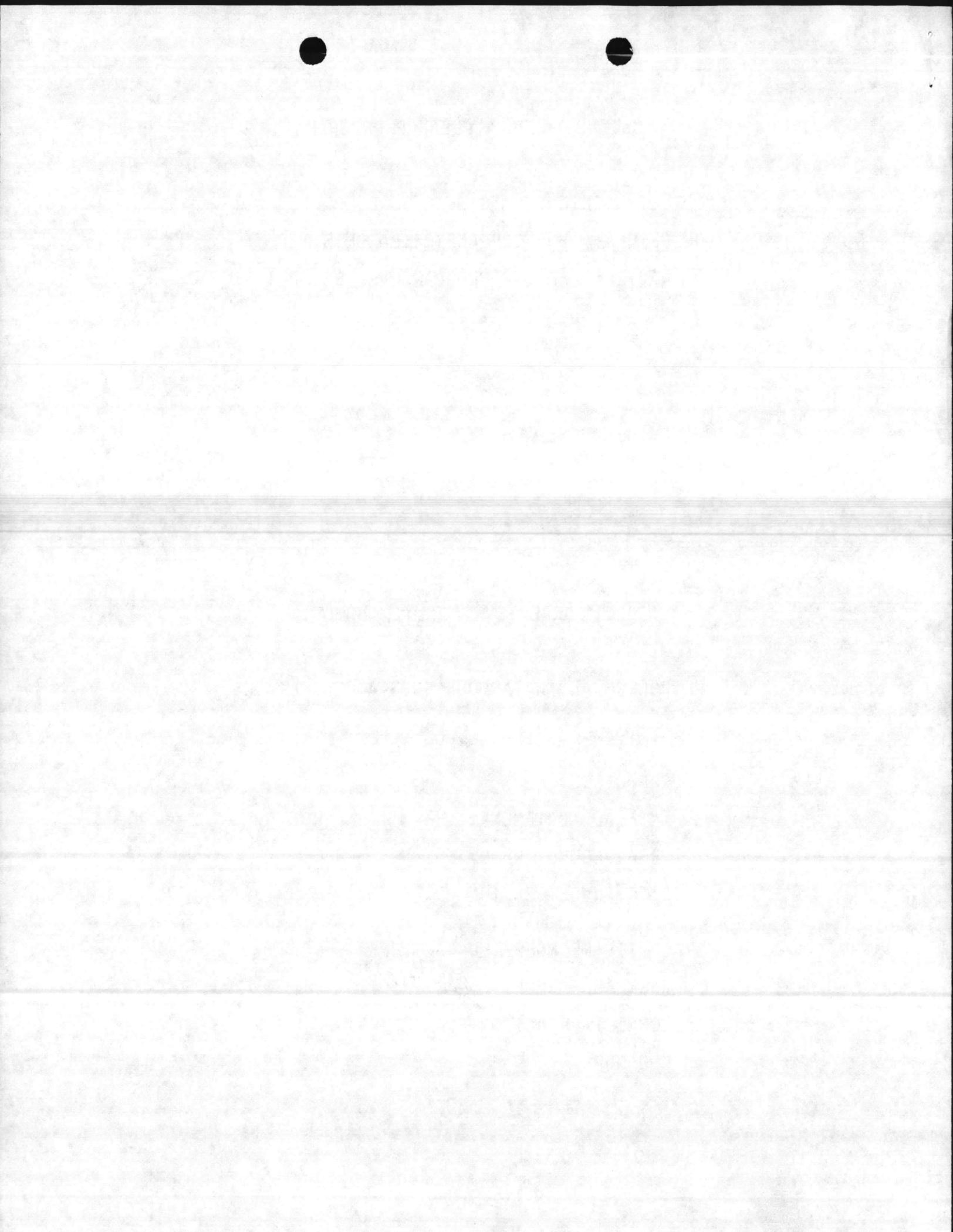


UST VS. CERCLA CLEANUP PROGRAMS

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

UST CORRECTIVE ACTION PROGRAM

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



DERA FUNDING FOR UST

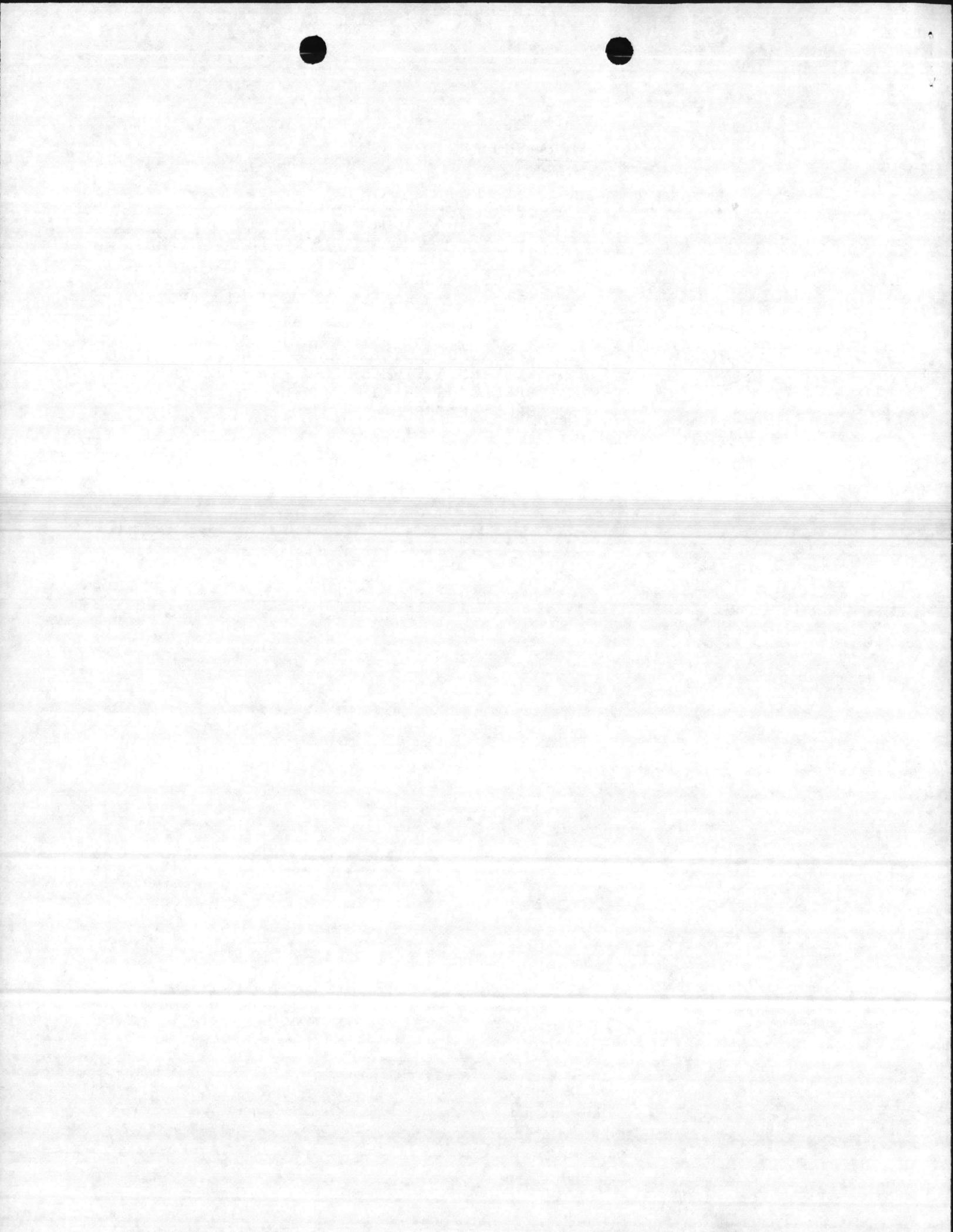
ELIGIBLE:

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

LEAKS PRIOR TO JAN 84
CLEANUP OF CONTAMINATION

INELIGIBLE:

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

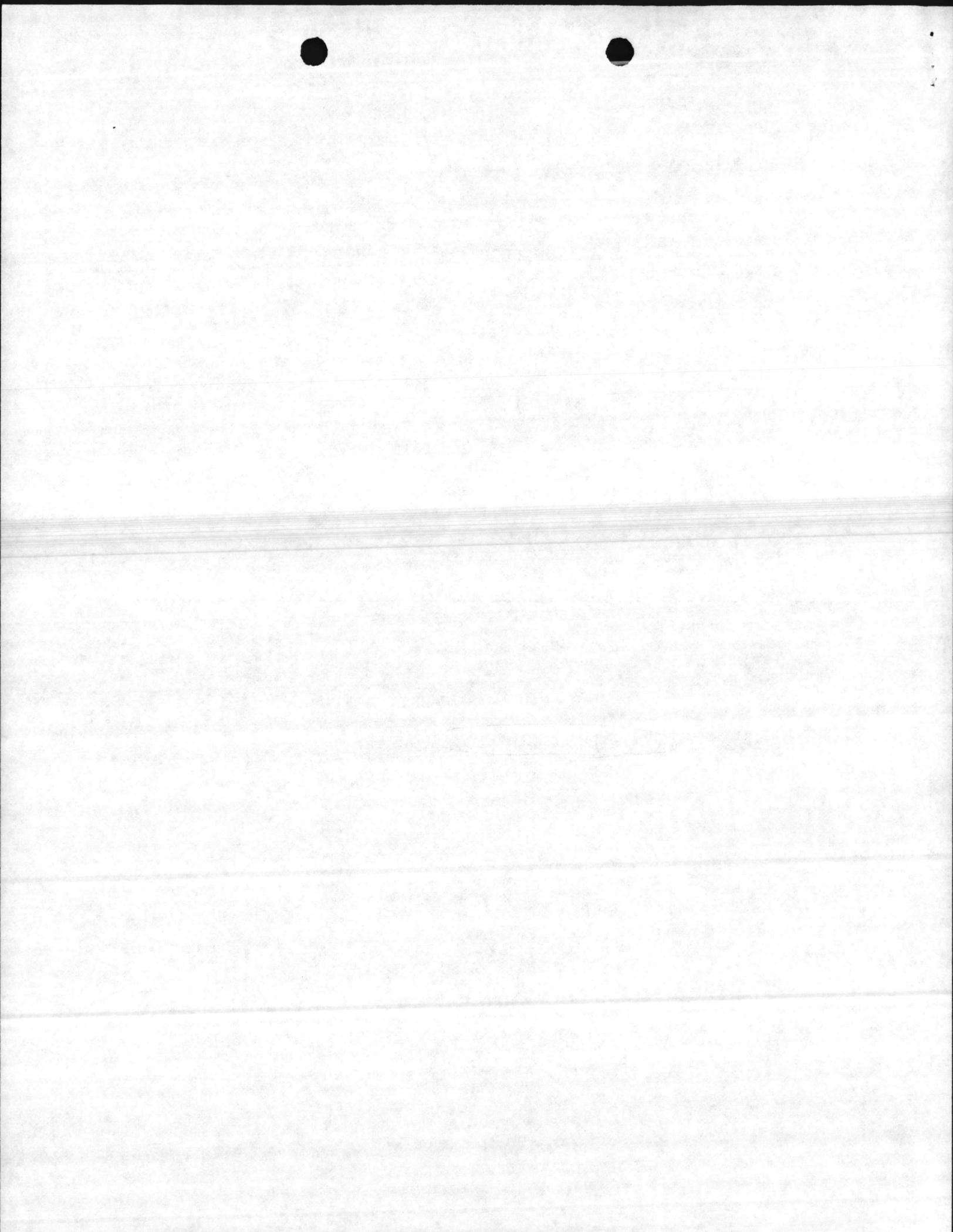


DERA MCON PROVISIONS

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

MCON DOCUMENTATION

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



DERA USE ON PROJECTS

○ EMERGING POLICY ISSUE

○ GREEN

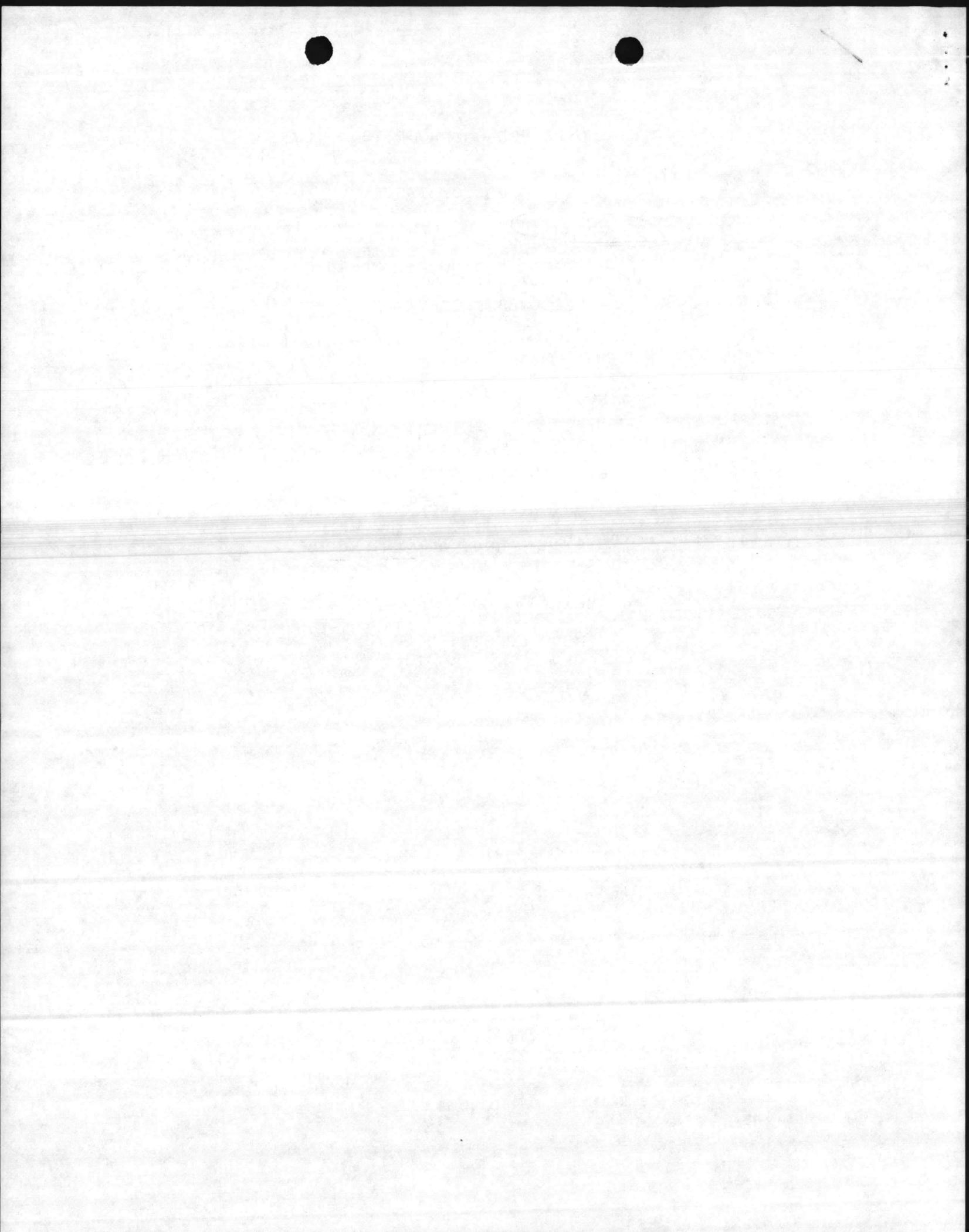
- CERCLA - REQUIRED CLEANUP
- PRECEDES PROJECT
- CLEANUP SITE >> PROJECT SITE

○ RED

- REQUIRED BY CONSTRUCTION
- INCIDENTAL TO PROJECT
- RESULTS IN INCREMENTATION
- MIXED FUNDING (O&M, MCON)

○ AMBER

- MOST EVERYTHING ELSE



ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 6-8-87

TO:

BASE MAINT O

DIR, FAMILY HOUSING

PUBLIC WORKS O

DIR, BACHELOR HOUSING

COMM-ELECT O

BASE FIRE CHIEF

DIR., NAT. RESOURCES & ENV. AFFAIRS

ATTN: Mr. Wosten

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

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

3. Your file copy.

[Handwritten signature]
by dir

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



10-3-22

[Faint, illegible handwriting]

[Faint, illegible handwriting]

18 MAY 1987
ACTION: BFAC
Route original



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

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

From: Commandant of the Marine Corps

Subj: MARINE CORPS USAGE OF CHLOROFLUOROCARBONS, CHLOROCARBONS
AND HALONS

Ref: (a) Clean Air Act

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

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

2. Participation in the development of this policy requires knowledge of Marine Corps POD usage. Toward this end, the Office of the Deputy Secretary 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 suppression 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

18 MAY 1987

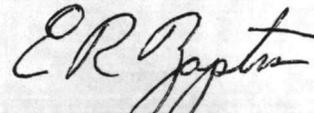
10 10 10

10 10 10

18 MAY 1987

Subj: MARINE CORPS USAGE OF CHLOROFLUOROCARBONS, CHOROCARBONS
AND HALONS

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



E. R. ZAPTIN
By direction

Distribution:

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

Copy to:
COMMARCORBASESPAC
COMCABEAST
COMCABWEST





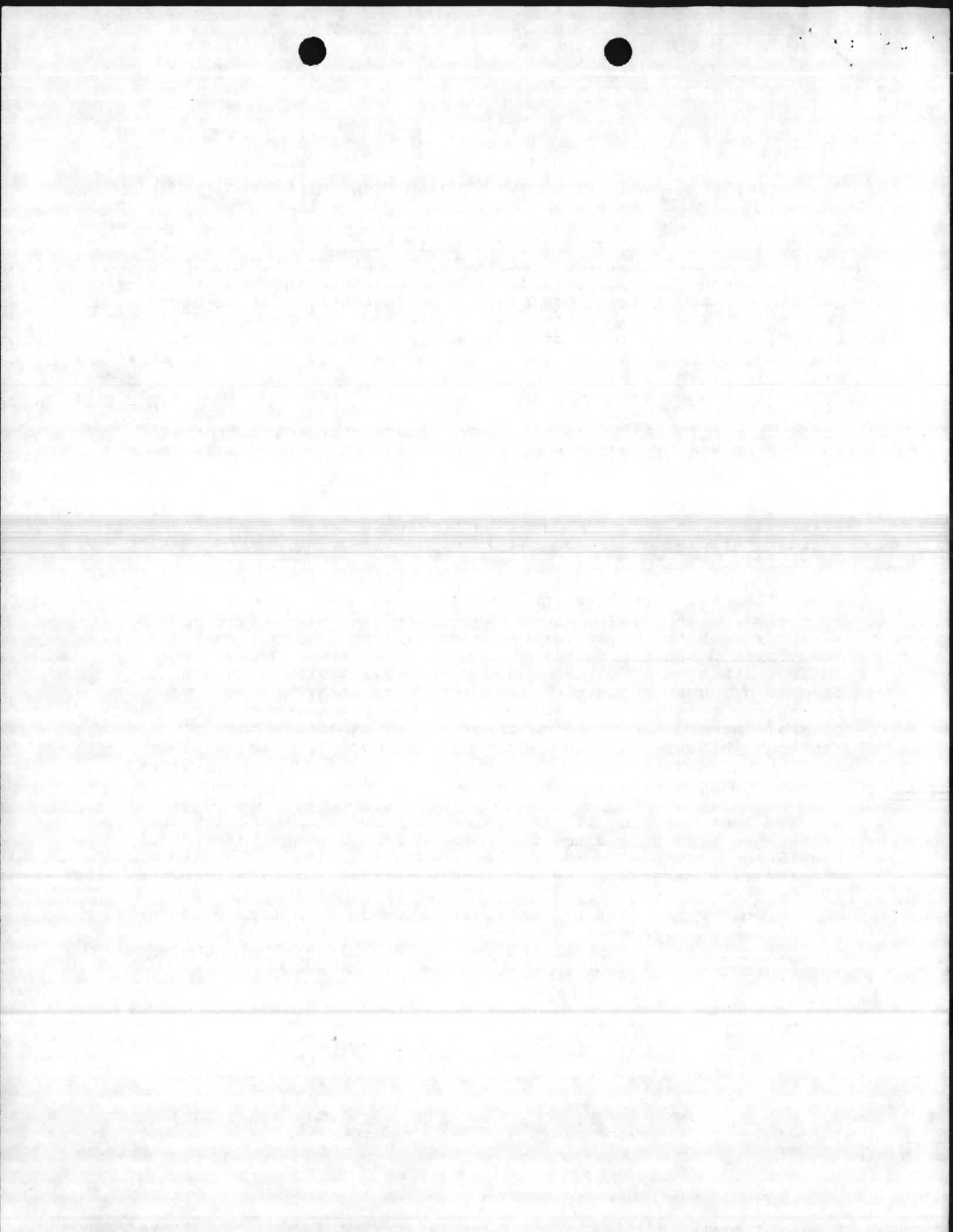
BACKGROUND INFORMATION ON POTENTIAL OZONE DEPLETERS (PODs)

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

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

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

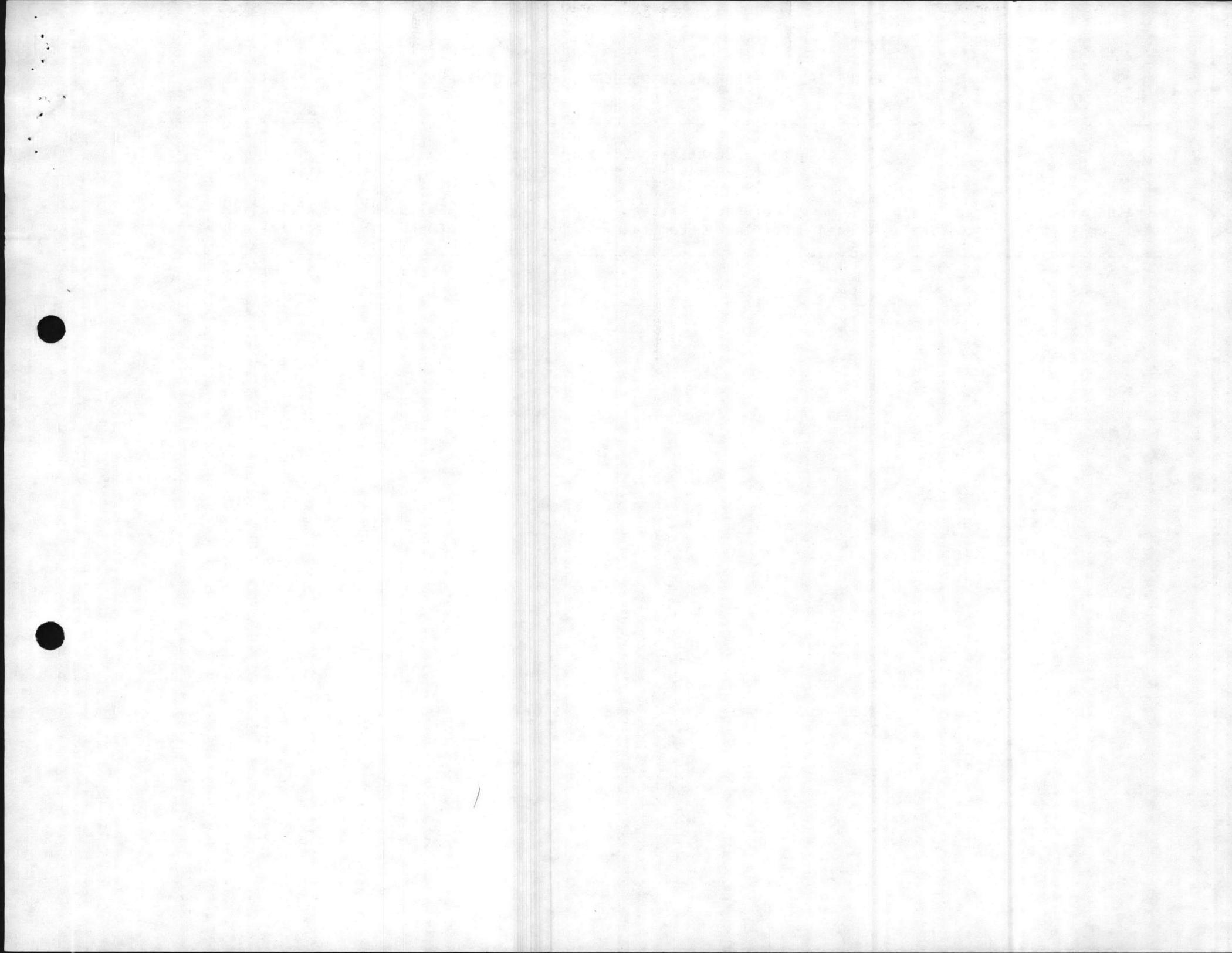
Encl: (1)



QUANTITATIVE INFORMATION NEEDED ON USAGE OF HALONS

Aggregate Quantities for Each Intended
System/Use (In 1000 lb Units)

Halon Type (1211 or 1301)	System/Use ¹	On Hand	Procured Per Year	Emitted ² Per Year	Substitutes ³	Emission ⁴ Controls	Detection ⁵ System(s)	Remarks ⁶
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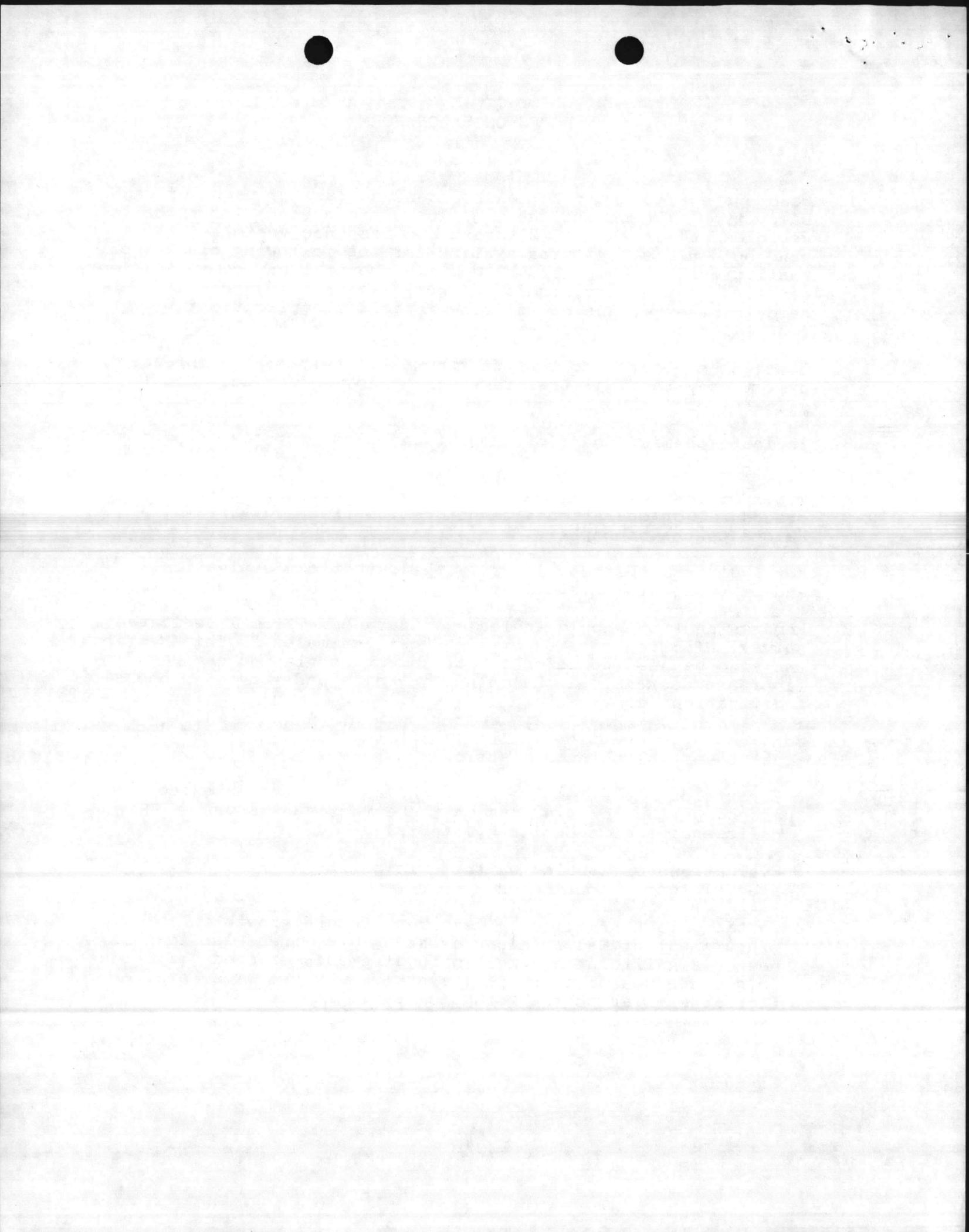


NOTES ON HALON FORM

1. Make a specific entry for each intended class of uses for each Halon type. These include: (1) on board systems for aircraft, vehicles and/or ships; (2) crash and response vehicles; (3) hand-held units; (4) area systems for the following classes of facilities: a) computer, b) command, control and communication centers, c) trainers, and/or d) work/storage; (5) quantities held in reserve; and/or (6) other specific applications (identify).
2. Quantities emitted to the atmosphere are part of the intended system use, testing, training, servicing, and/or accidental releases or leaks.
3. Indicate chemical name of known (non-Halon) substitutes for the intended class uses.
4. Types of control equipment, recovery processes or other procedural or operational techniques to limit releases of Halons to the atmosphere.
5. For 1301 area systems, identify the detection, activation and/or procedural steps in place to minimize false discharges.
6. Remarks section should indicate if data came from a dedicated survey, existing records or are "best estimates." This section can also be used to refer to attachment on planned changes (increase/decrease) in Halon use, studies underway on process modification, etc.

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

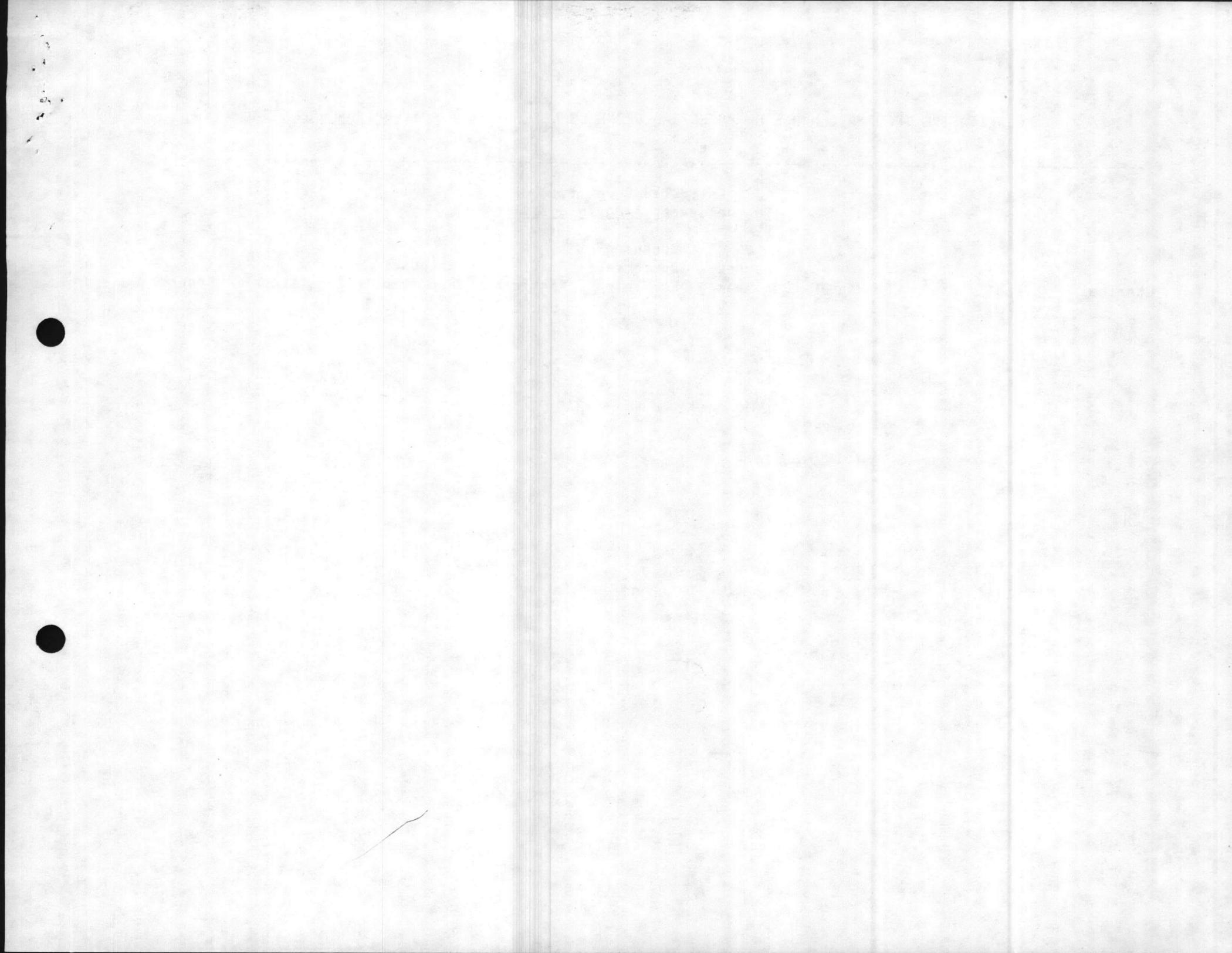
- o Reports on the effectiveness of Halons for the intended use and comparison or findings on the effectiveness or deficiencies of substitute materials.
- o Evaluations or studies on the criticality of Halons for specific operational uses.
- o To the extent practicable, estimate future growth in procurement of Halons along existing use lines plus identify new or significant changes in requirements or needs of Halons (e.g., new weapon or support systems, new use area, etc., (format similar to the foregoing table may be used)).



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

Estimated Quantity
(To the nearest 100 lb Units)

Chemical ¹	Class ²	Use ³	On Hand ⁴	Procured Per Year	Consumed ⁵ (Destroyed) Per Year	Emitted ⁶ Per Year	Disposal ⁷ Per Year	Substitute ⁸	Remarks ⁹
-----------------------	--------------------	------------------	----------------------	----------------------	--	----------------------------------	-----------------------------------	-------------------------	----------------------



NOTES ON POTENTIAL OZONE DEPLETERS
OTHER THAN HALON

1. Chemical name and formula.
2. POD Class (e.g., CFC or Chlorocarbon).
3. Specific end use or process(es) involvement.
4. Static quantities in systems, process tanks, or reserve storage.
5. Quantities consumed or destroyed (not emitted) as part of its use.
6. Quantities emitted to the atmosphere as part of the intended process, testing, training, and/or accidental releases, spills or leaks.
7. Quantities disposed due to expiration of shelf life or other signs of non-effectiveness.
8. Indicate chemical name of known (non-POD) substitutes for the intended use.
9. Remarks section should indicate if data came from a dedicated survey, existing records, or are "best estimates." This section can also be used to refer to attachments on planned changes (increase/decrease) in use, studies underway on process modifications, etc.
 - a. Reports on the effectiveness of POD materials foddress the issues. EPA has begun collecting data on POD production, usage, imports and exports as part of their decision to regulate and, if so, to what extent.

6241/5
NREAD
17 Sep 87

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

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

Ref: (a) BO 6240.5

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

1. Enclosures (1) and (2) are provided for use in turn-in of used transformer oil to Defense Utilization and Marketing Officer, (DRMO). Enclosure (2) relates the sample number to the serial number. The sample number is also on the transformer.
2. Sample number 1752 refers to a transformer located at the Air Station that had no serial number on it.
3. The results indicate that none of the transformers had over 500 parts per million (ppm or mg/kg) PCB's. Three of the transformers had 50 to 499 ppm of PCB's which requires management as "PCB contaminated transformers". These three transformers should be turned in to DRMO and stored in the PCB storage building at Lot 140.
4. DRMO should be requested to take physical custody of the remaining transformers. Point of contact for this matter is Tom Barbee, NREAD, extension 5977.

C. D. PETERSON
Acting

Copy to:
DRMO (w/o Encls)

Blind copy to:
EC&MS (2)

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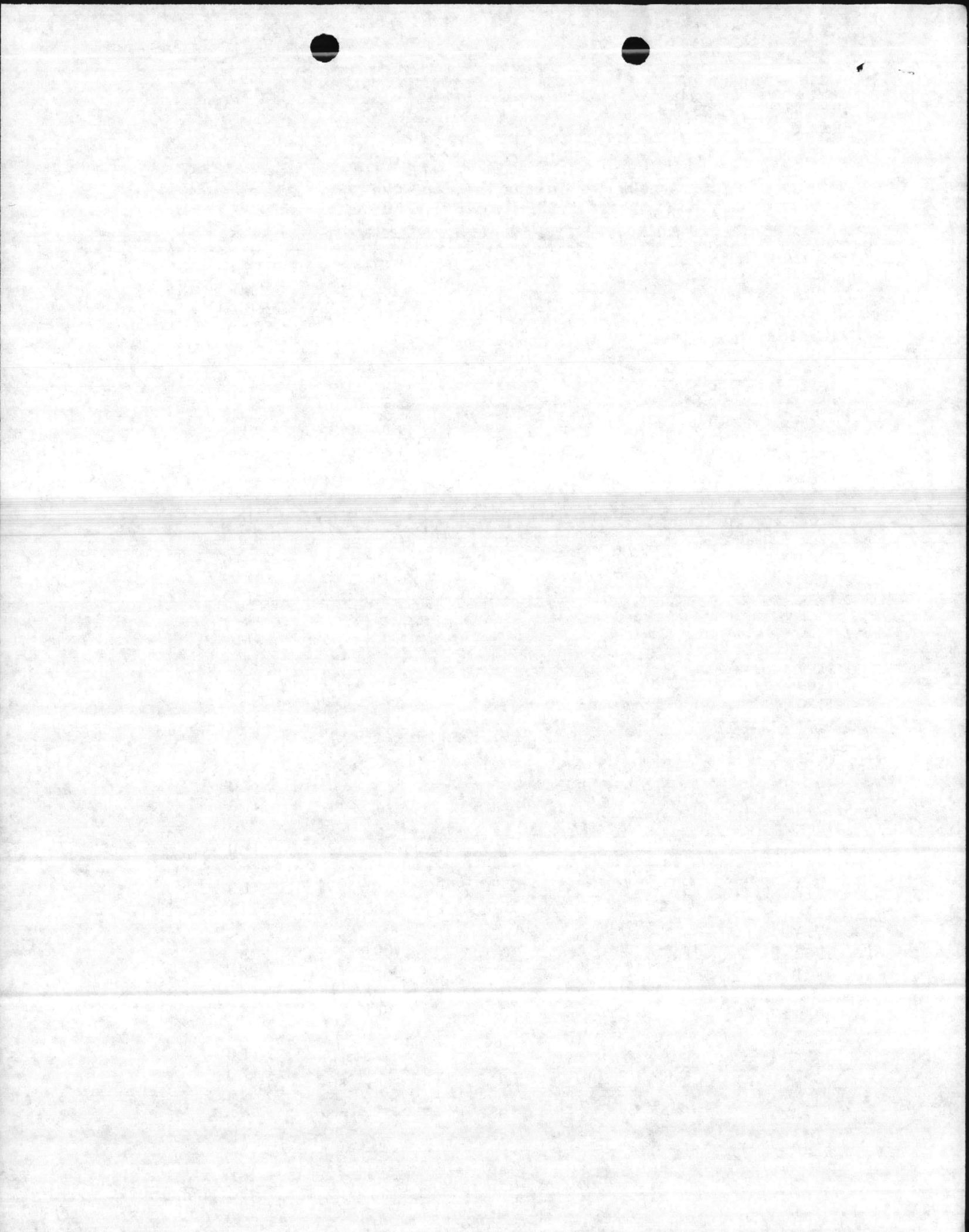
Second block of faint, illegible text, appearing to be a continuation of the document's content.

Third block of faint, illegible text, possibly containing a list or detailed information.

Fourth block of faint, illegible text, likely a concluding paragraph or signature area.

Fifth block of faint, illegible text at the bottom of the page, possibly a footer or reference.

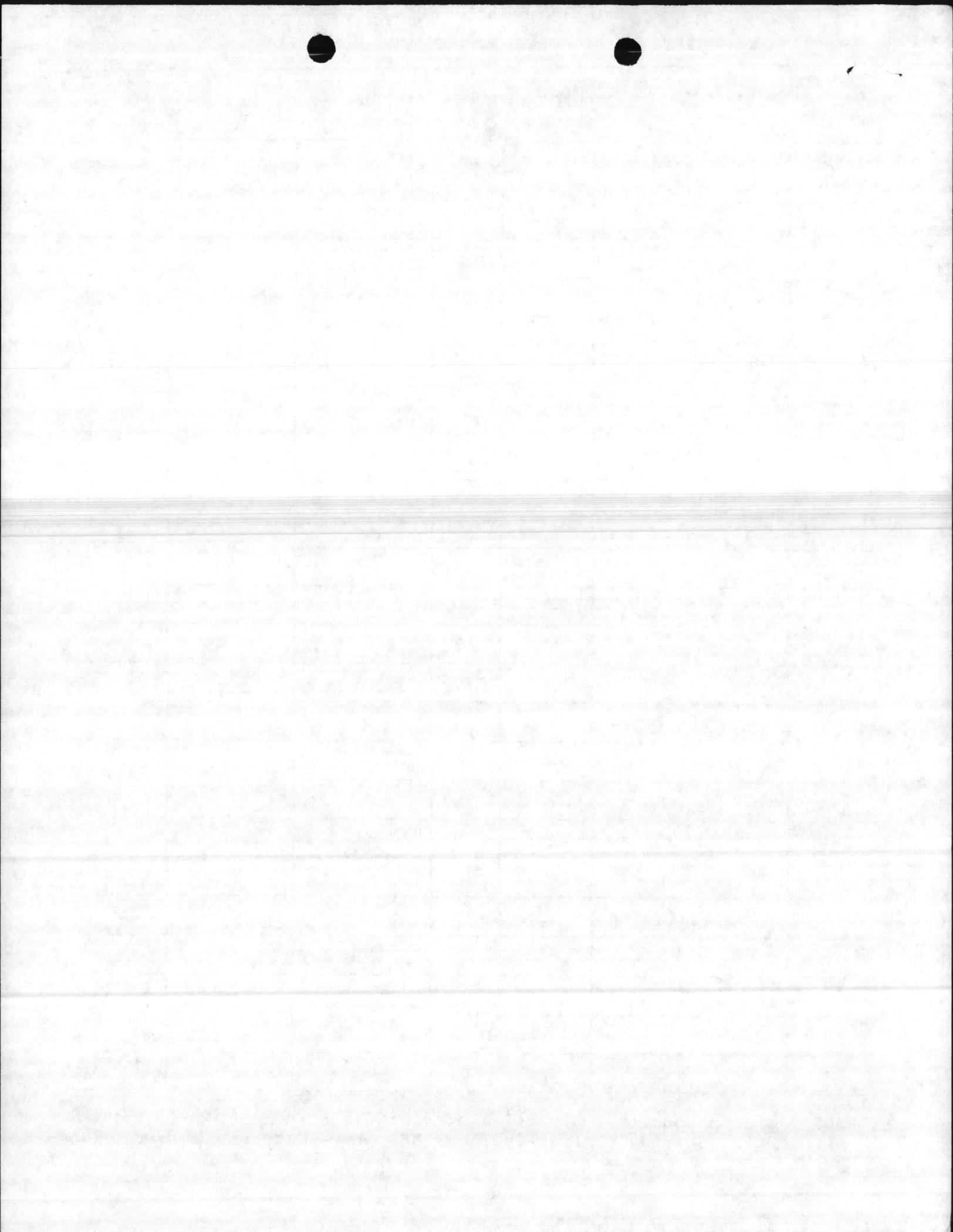
	<u>Aroclor 1242 mg/Kg</u>	<u>Aroclor 1254 mg/Kg</u>	<u>Aroclor 1260 mg/Kg</u>	<u>Total Aroclors mg/Kg</u>
1752		33		33
1753				<1.0
1754				<1.0
1755		5.1		5.1
1756			25	25
1757				<1.0
1758			7.8	7.8
1759			2.1	2.1
1760			2.4	2.4
1761			2.7	2.7
1762				<1.0
1763			2.3	2.3
1764			5.0	5.0
1765				<1.0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

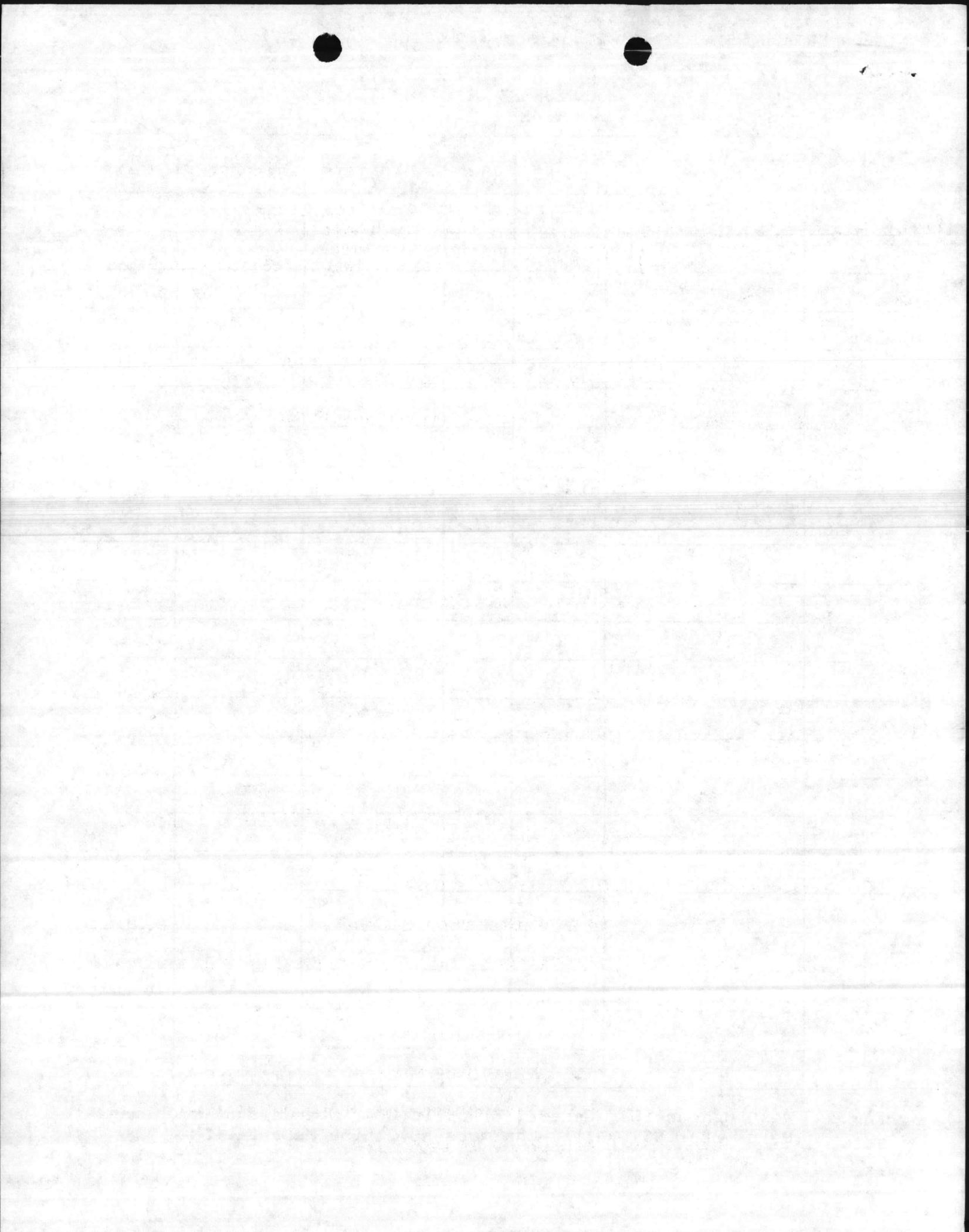


TRANSFORMER OIL SAMPLES

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

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





6240
NREAD
15 Sep 87

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

Subj: HAZARDOUS WASTE

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

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

a. Lithium Batteries - Base should:

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

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

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

b. Waste Oil - Base should:

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

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

c. Ordnance disposal - Base should:

(1) Research the problems and determine:

- (a) How much ordnance is being disposed at Camp Lejeune?
- (b) How much ordnance is being used by EOD to train EOD
personnel?
- (c) Kind of ordnance being disposed at Camp Lejeune?
- (d) Where aboard base is ordnance being disposed?
- (e) How often is ordnance being disposed at Camp Lejeune?
- (f) Who is disposing of ordnance at Camp Lejeune?

1952
1953
1954

From Director, Western Division and Divisional Director,
Divisional Office, Western Division, 1952-1954

1955-1956
1957-1958
1959-1960

1961-1962
1963-1964
1965-1966

1967-1968
1969-1970
1971-1972

1973-1974
1975-1976
1977-1978

1979-1980
1981-1982
1983-1984

1985-1986
1987-1988
1989-1990

1991-1992
1993-1994
1995-1996

1997-1998
1999-2000
2001-2002

2003-2004
2005-2006
2007-2008

Subj: HAZARDOUS WASTE

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

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

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

2. NREAD Recommendations:

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

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

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

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

...the ...
...the ...
...the ...

6240
NREAD

Subj: HAZARDOUS WASTE

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

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

J. I. WOOTEN

Page 2

The following information was obtained from the records of the State Department regarding the activities of the Communist Party, U.S.A., in the State of New York during the period from 1945 to 1950.

The Communist Party, U.S.A., is a political party which is organized and operated in accordance with the principles of the Communist Manifesto.

6240
NREAD
16 Sep 87

From: Director, Natural Resources and Environmental Affairs
Division, Marine Corps Base, Camp Lejeune
To: Base Maintenance Officer, Marine Corps Base, Camp Lejeune
Subj: N. C. ANNUAL FEES BILLING FOR HANDLERS OF HAZARDOUS WASTE
OF 1 SEPTEMBER 1987
Ref: (a) Discussion btwn Col Lilley, BMO, and J. I. Wooten,
NREAD, on 11 Sep 87
(b) FONECON btwn Mr. Paul Hubbell, HQMC, and J. I. Wooten,
NREAD, on 11 Sep 87
Encl: (1) N. C. Dept. of Human Resources, Div. of Health Services
Memo of 1 Sep 87

1. During reference (a), Col Lilley raised a question about the subject bill being a tax by the State of North Carolina. State taxes and funds were the subject of discussion at the HQMC Facilities Conference of 17 - 21 August 1987.
2. During a review of relivant criteria with Mr. Hubbell during reference (b), it was concluded the fee assessed by the enclosure must be paid.
3. If I can be of further assistance, please advise.

J. I. WOOTEN

Division of Marine Fisheries
Department of the Interior
Washington, D. C.

Washington, D. C., June 11, 1954

Mr. J. C. ...
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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

September 1, 1987

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

SUBJECT: Annual Fees Billing for Handlers of Hazardous Waste

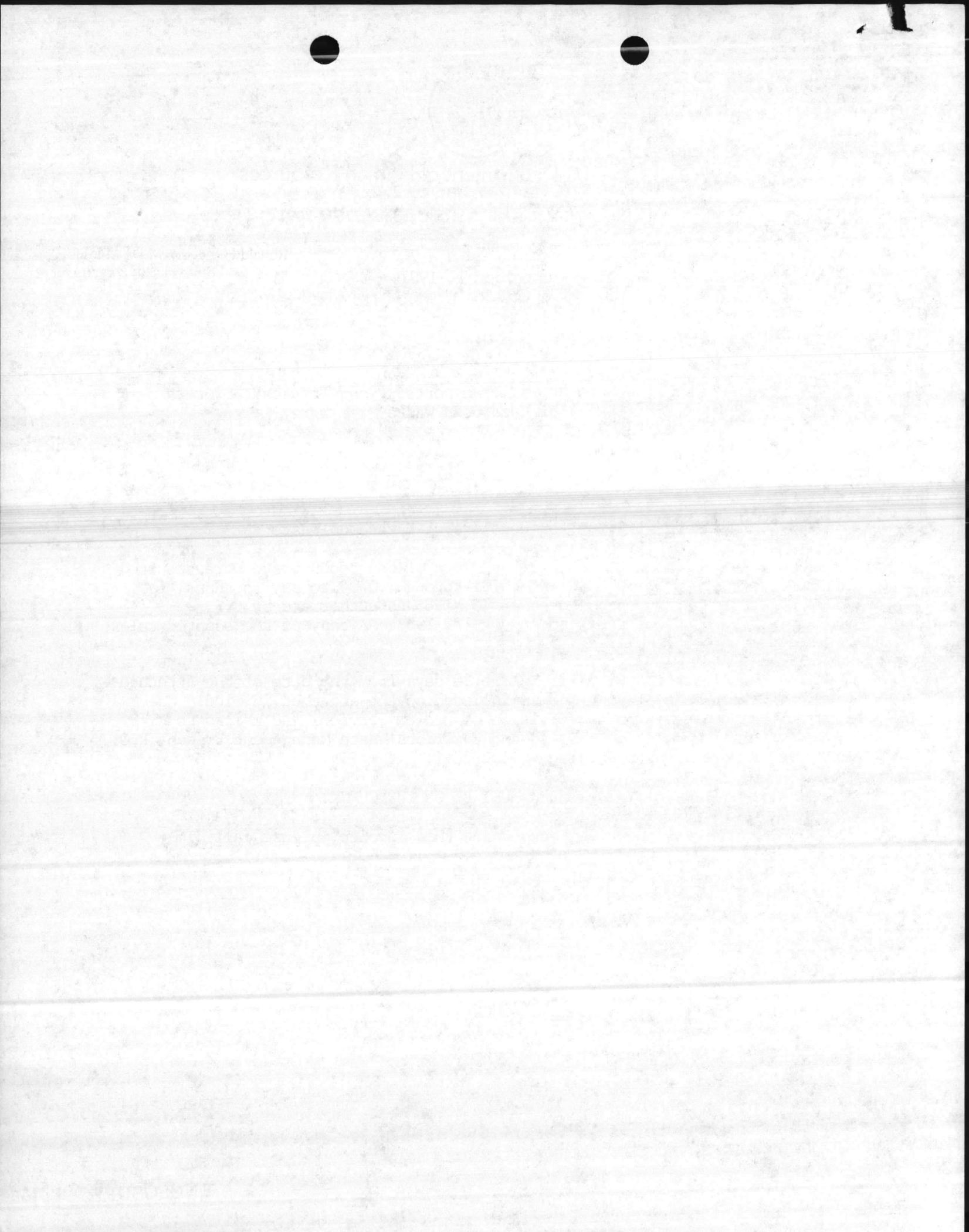
Effective January 1, 1986, all handlers of hazardous waste were required by administrative rule 10 NCAC 10C .0701 through .0704 to pay an annual fee. The above rules were adopted November 13, 1985 as authorized by G.S. 130A-29(a)(7) which was ratified August 12, 1987. A copy of the adopted rules is included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

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

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

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

ENCLOSURE (1)





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

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

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

SEPTEMBER 1, 1987

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

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

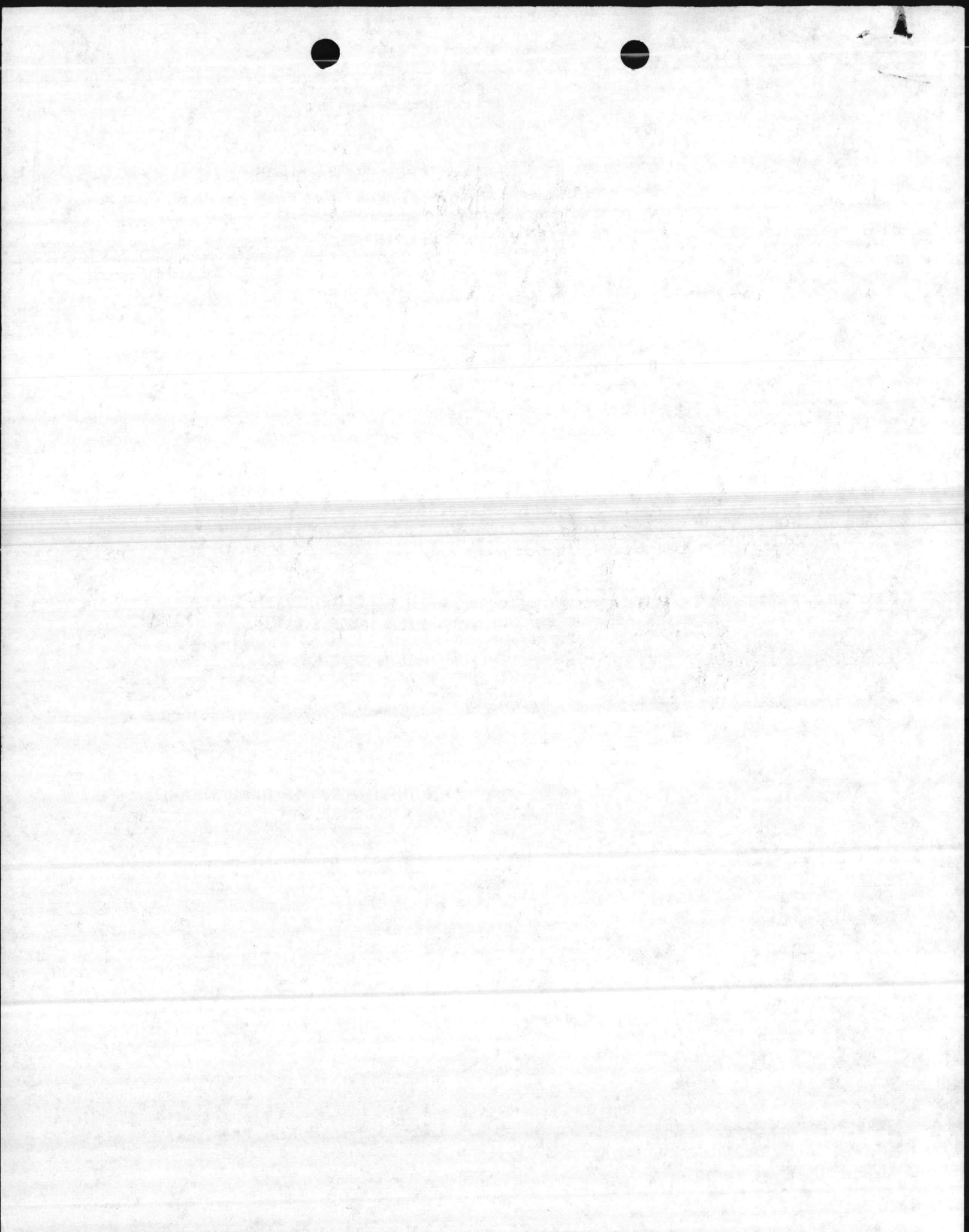
DESCRIPTION OF CHARGES	RATE	QTY. (TONS)	AMOUNT
GENERATOR OF HAZARDOUS WASTE			\$600.00
WASTE GENERATED	\$0.50	64	\$32.00
STORAGE FACILITY			\$1,200.00
TRANSPORTER OF HAZARDOUS WAS			\$600.00
TOTAL AMOUNT DUE			\$2,432.00

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

PLEASE MAKE CHECK PAYABLE TO: DIVISION OF HEALTH SERVICES

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

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



JW

Copy furnished Dan + Betty 9-16-87

*File
NPDES*

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

6280/2
FAC
SEP 11 1987

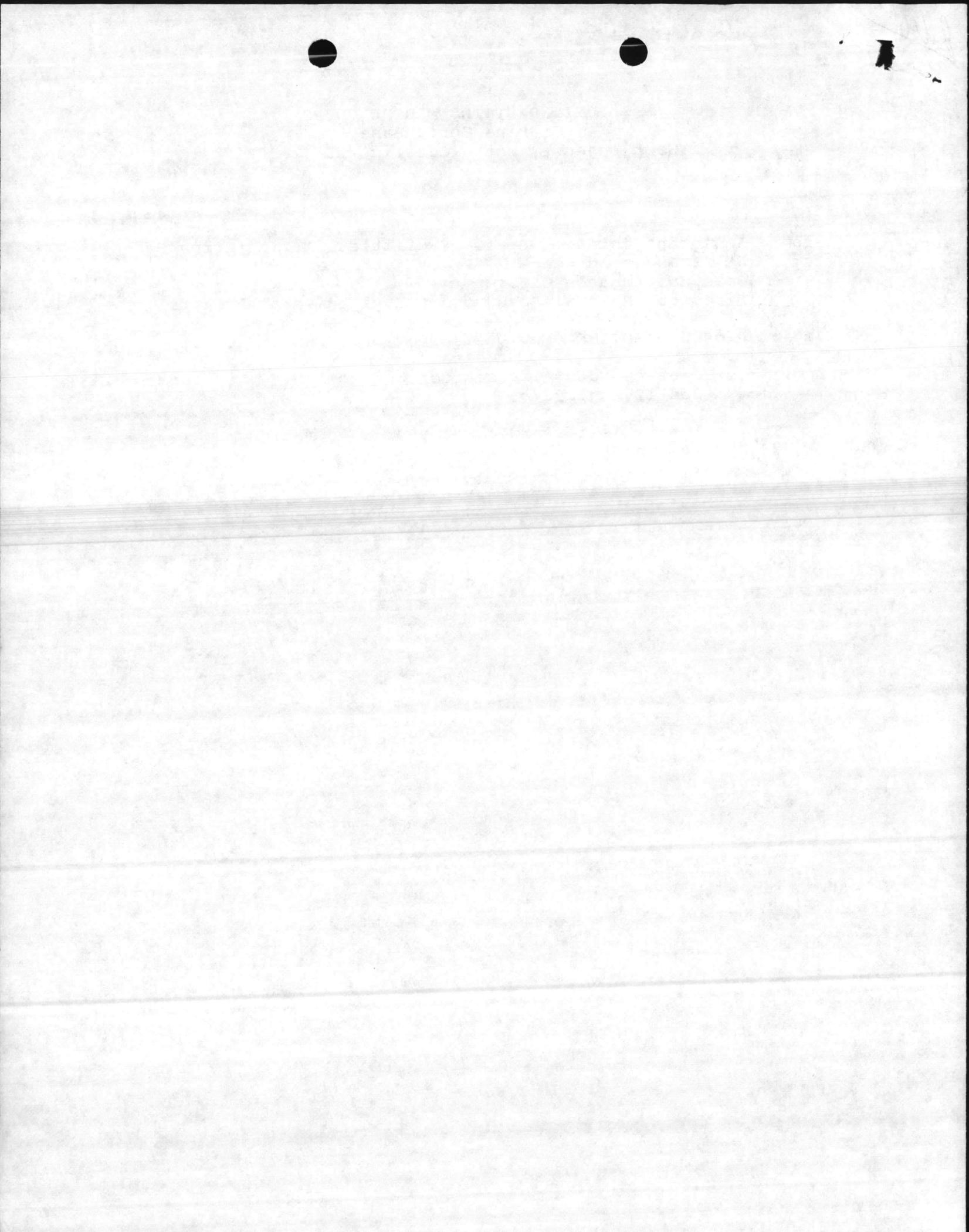
From: Assistant Chief of Staff, Facilities, Marine Corps Base
To: Staff Judge Advocate
Base Maintenance Officer
→ Director, Natural Resources & Environmental Affairs

Subj: PROPOSED NOTICE OF VIOLATION, NPDES PERMIT VIOLATION

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

1. The enclosure is forwarded for your information.

BW Elston
B. W. ELSTON
Acting





pub 31

State of North Carolina
Department of Natural Resources and Community Development
Division of Environmental Management
512 North Salisbury Street • Raleigh, North Carolina 27611

James G. Martin, Governor
S. Thomas Rhodes, Secretary

R. Paul Wilms
Director

August 12, 1987

Dear Permit Holder:

Subject: Notices of Noncompliance
NPDES Permit Violations

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

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

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

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

Sincerely,

A handwritten signature in dark ink, appearing to read "R. Paul Wilms".

R. Paul Wilms

Pollution Prevention Pays

P.O. Box 27687, Raleigh, North Carolina 27611-7687 Telephone 919-733-7015

An Equal Opportunity Affirmative Action Employer



100-1-100

6280
SJA41

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

Dear Mr. Meyer:

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

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



...

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

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

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



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

Sincerely,

J. E. CASSITY

Major General, U. S. Marine Corps

Commanding General



6280
SJA41
SEP 03 1987

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

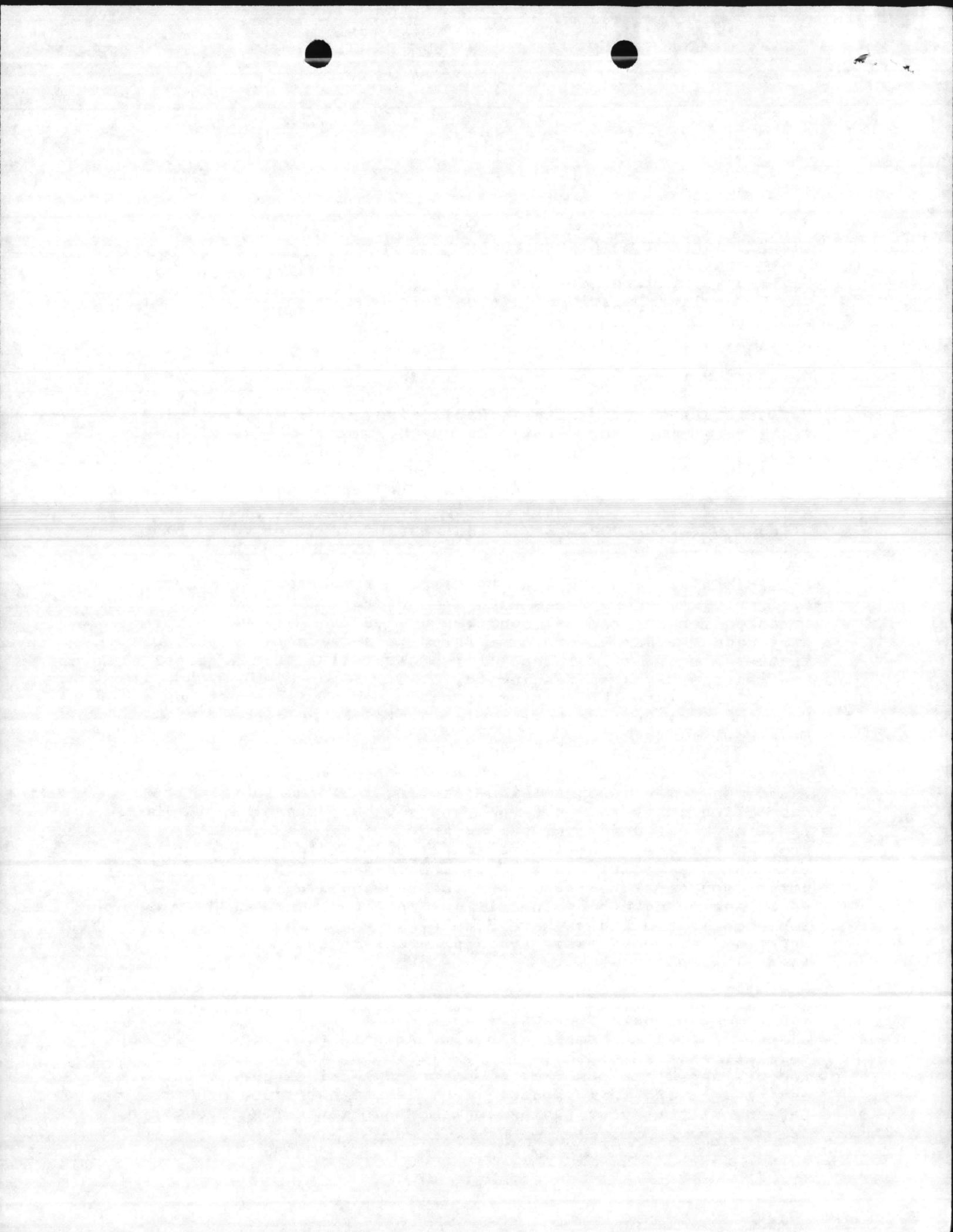
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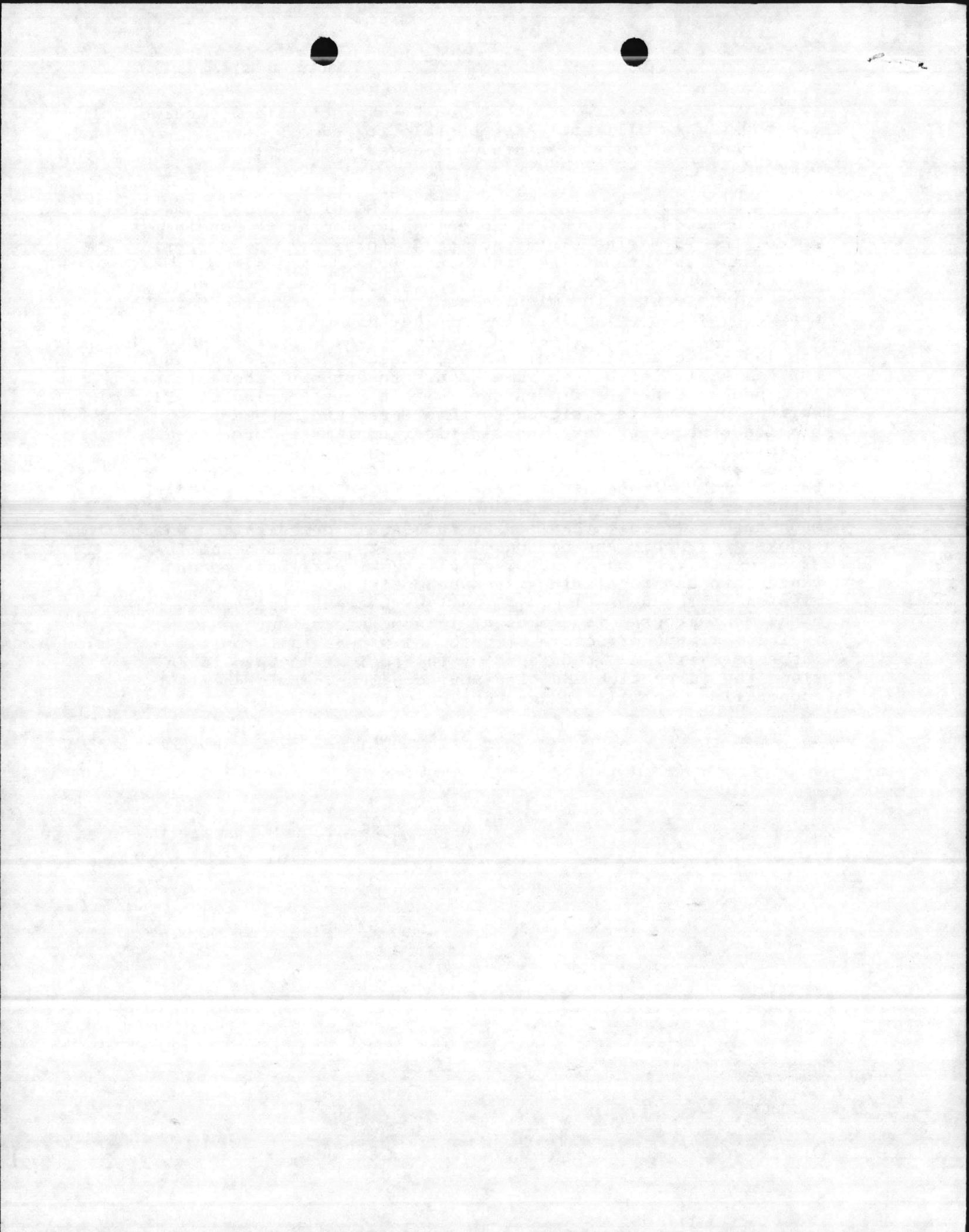


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Sincerely,

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



6280
SJA41
SEP 03 1987

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

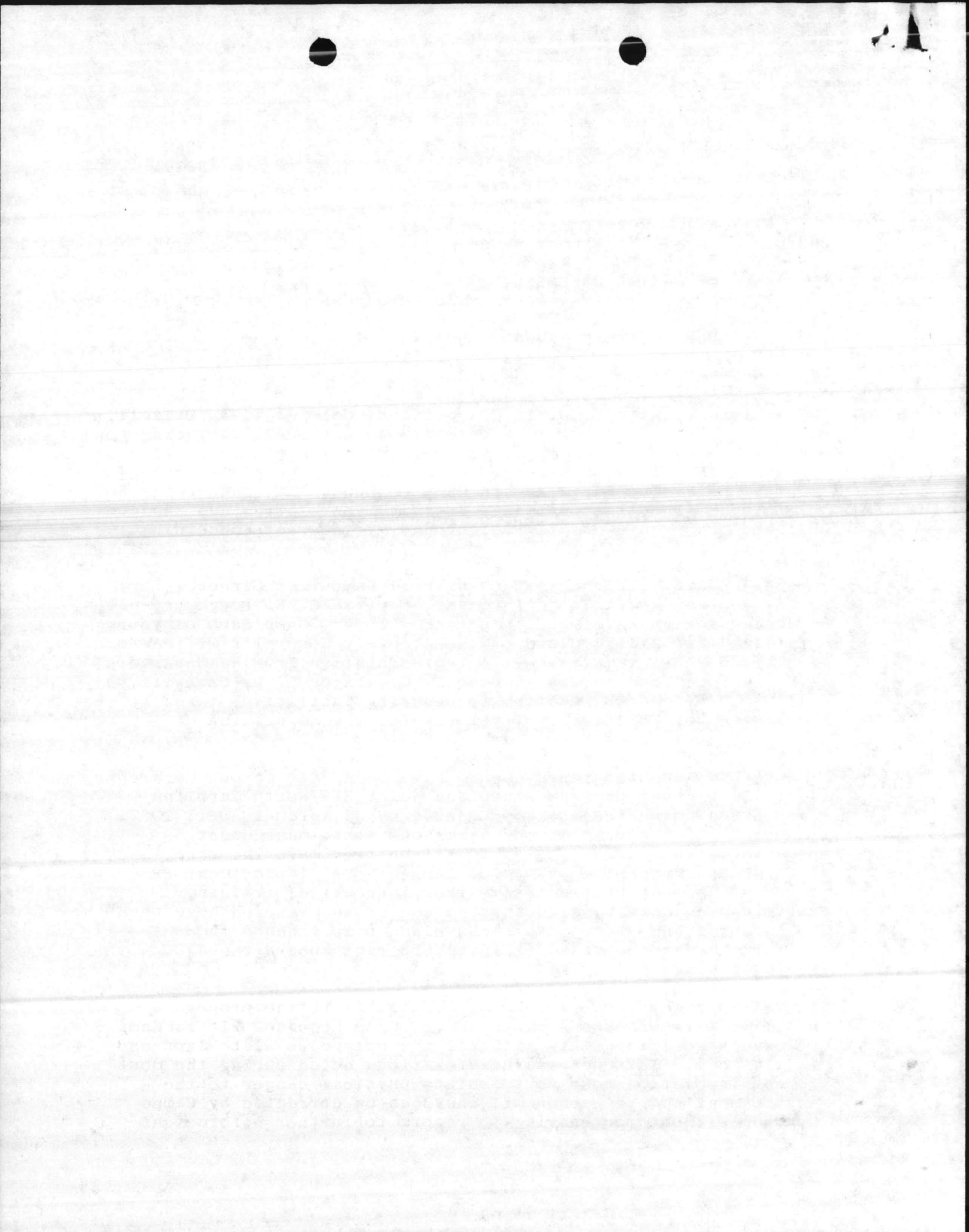
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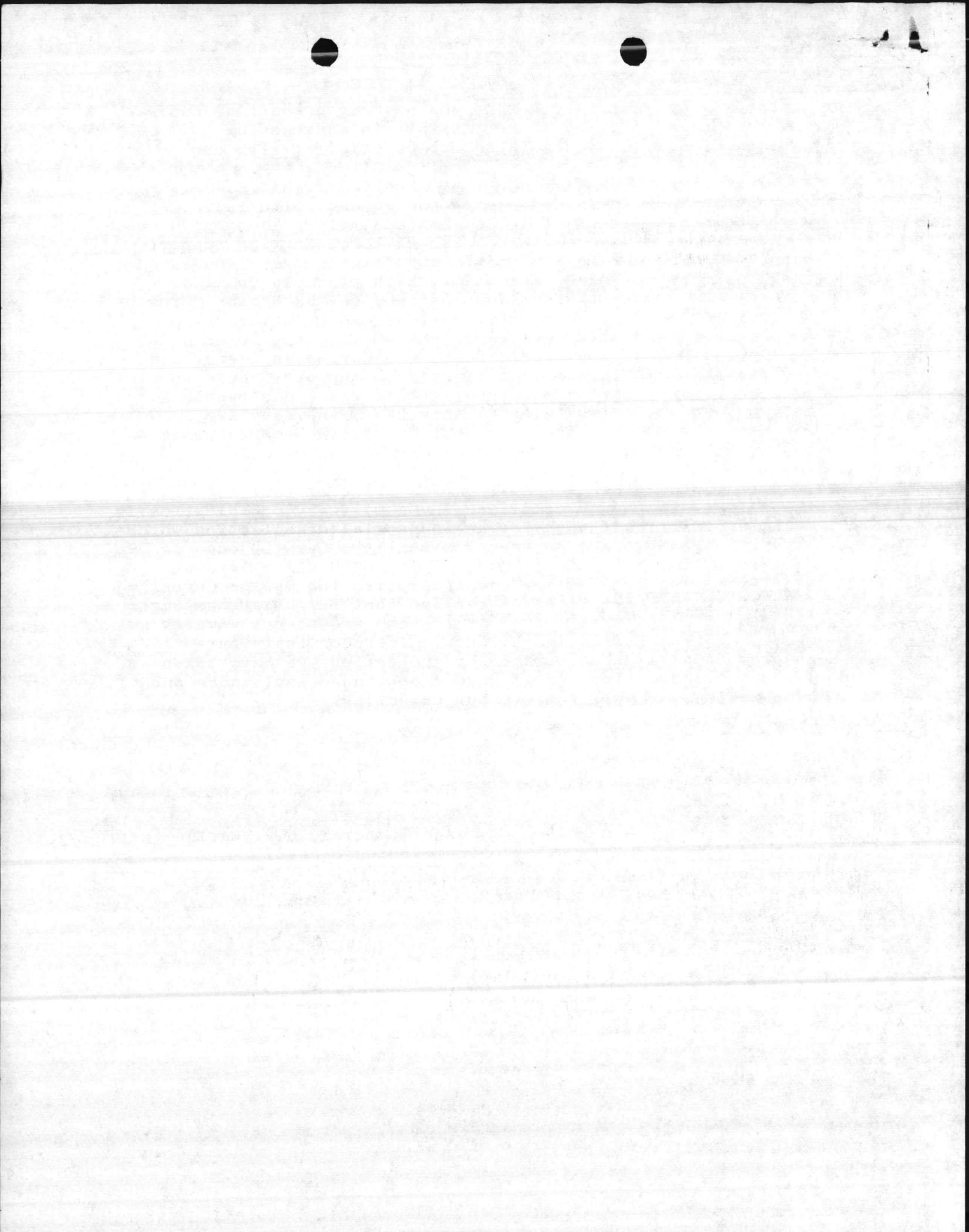


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Sincerely,

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



NREAD

6240/1
NREAD
11 Sep 87

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

Subj: ANALYSIS OF HAZARDOUS MATERIALS; RESULTS OF

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

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

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

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

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

JULIAN I. WOOTEN
By direction

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

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

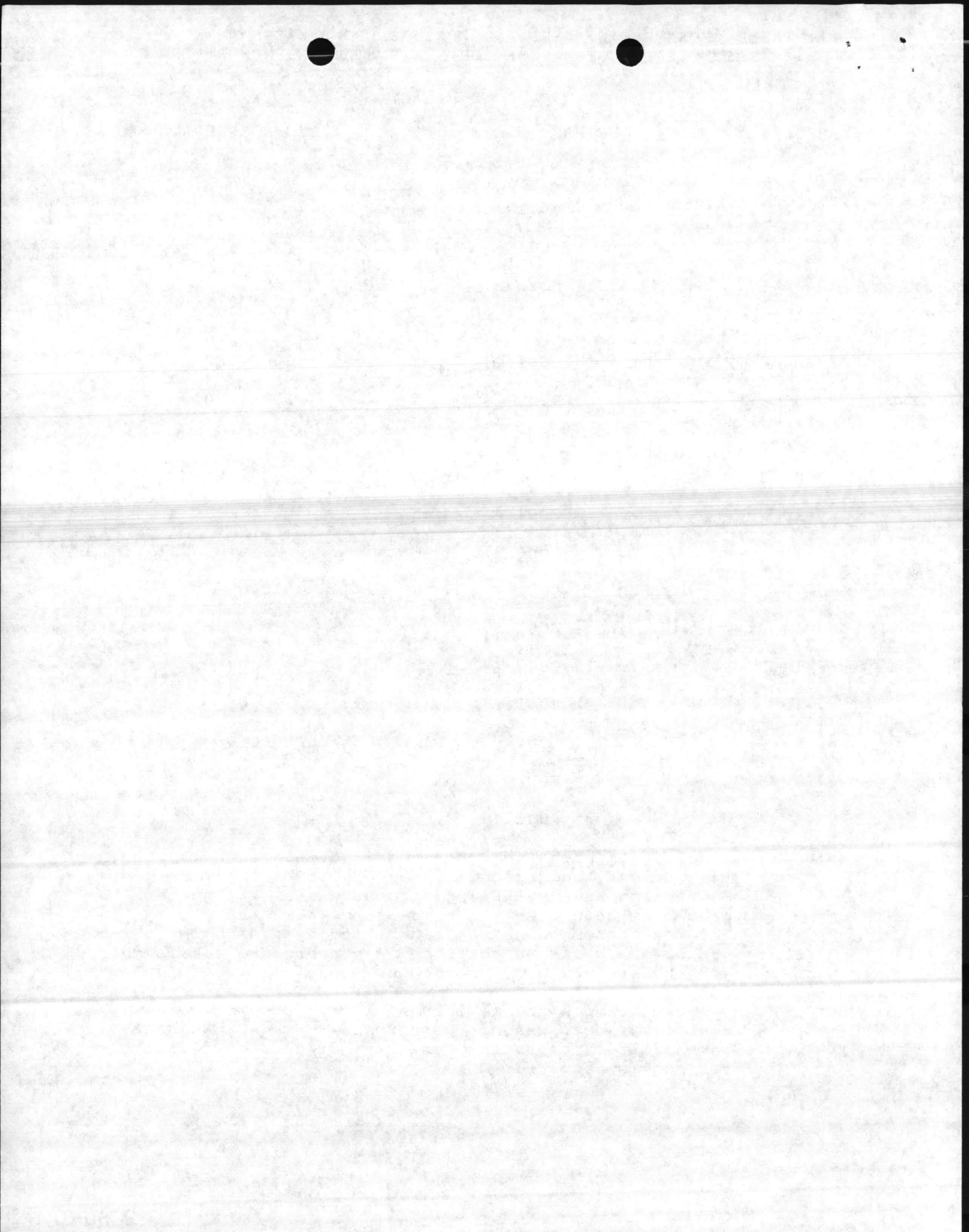
Note #1: Based on information contained in attachments (A) and (B), primary and secondary (if applicable) Environmental Protection Agency (EPA) hazardous waste (HW) numbers have been determined. It is recommended that the information contained herein be reviewed with the generator to ensure that the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

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

Prepared by:

Elizabeth A. Betz
 Signature

11 SEPTEMBER 1987
 Date



Partial Results

REPORT # 539

LABORATORY ANALYSIS ON

NAVAL SAMPLES

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

JTC REPORT # 87-132

PREPARED FOR:

DEPARTMENT OF THE NAVY

ATLANTIC DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

NORFOLK, VA 23511

PREPARED BY:

JTC ENVIRONMENTAL CONSULTANTS, INC.

4 RESEARCH PLACE, SUITE L-10

ROCKVILLE, MARYLAND 20850

APRIL 22, 1987

Ann E Rosecrance

Ann E. Rosecrance
Laboratory Director

Attach next A



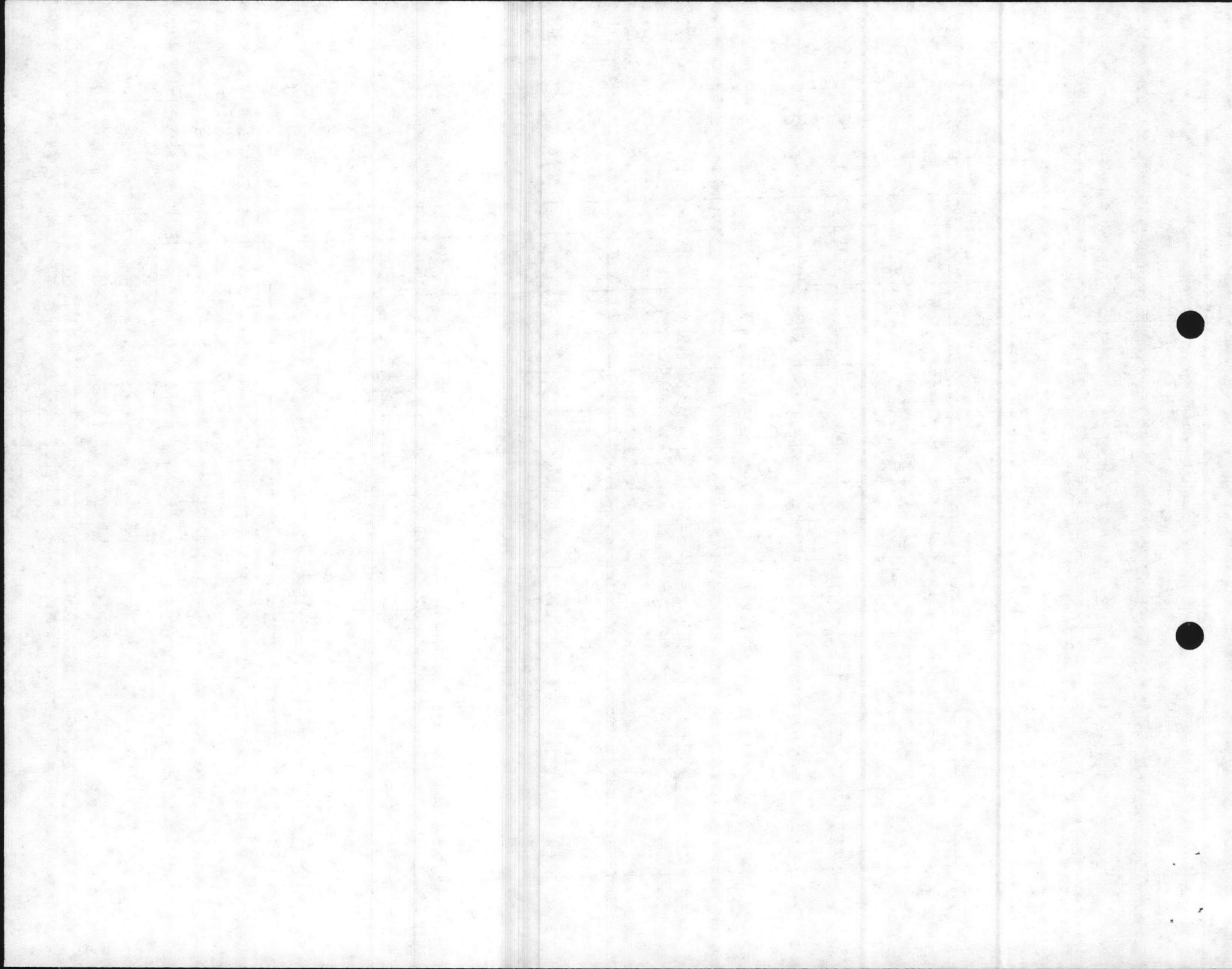
Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine
 Date: 4-22-87 Report No. 539 to Naval Facilities Engineering Command, Norfolk, Virginia
 JTC Data Report No. 87-132 Table 1

NAVY SAMPLE NO.	JTC SAMPLE ID	ANALYSIS PARAMETER						
		TOX ppm	Corrosivity pH	Flashpoint °C ⁺	PCB ug/g			
87-01 top layer	12-4435	<100	*	65	<5			
87-01 bottom layer	12-4435	<500	*	35	**			
87-02	12-4436	<500	6.1	50	<5			
87-03	12-4437	<100	6.0	45	<5			
87-04	12-4438	340	10.9	not observed boiled at 70°	<5			
87-05 top layer (oil)	12-4439	200	*	70"	<5			
87-05 bottom layer (water)	12-4439	<500	7.0	not observed boiled at 100°	**			
87-06	12-4440	100	*	45	<5			
87-07	12-4441	<100	6.0	20	<5			
87-08	12-4442	<100	*	65	<5			
87-09	12-4443	<100	6.0	20	<5			
87-10	12-4444	5900	*	20	<5			
87-11	12-4445	<100	*	75	<5			
87-12	12-4446	100	*	45	<5			
87-13	12-4447	<500	5.9	55	<5			

* unable to do analysis due to sample matrix

+ level of confidence ± 5°C

** insufficient sample volume to do analysis



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

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

JTC Data Report No. 87-132 Table 2

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

* unable to do analysis due to sample matrix
 † level of confidence ± 5°C

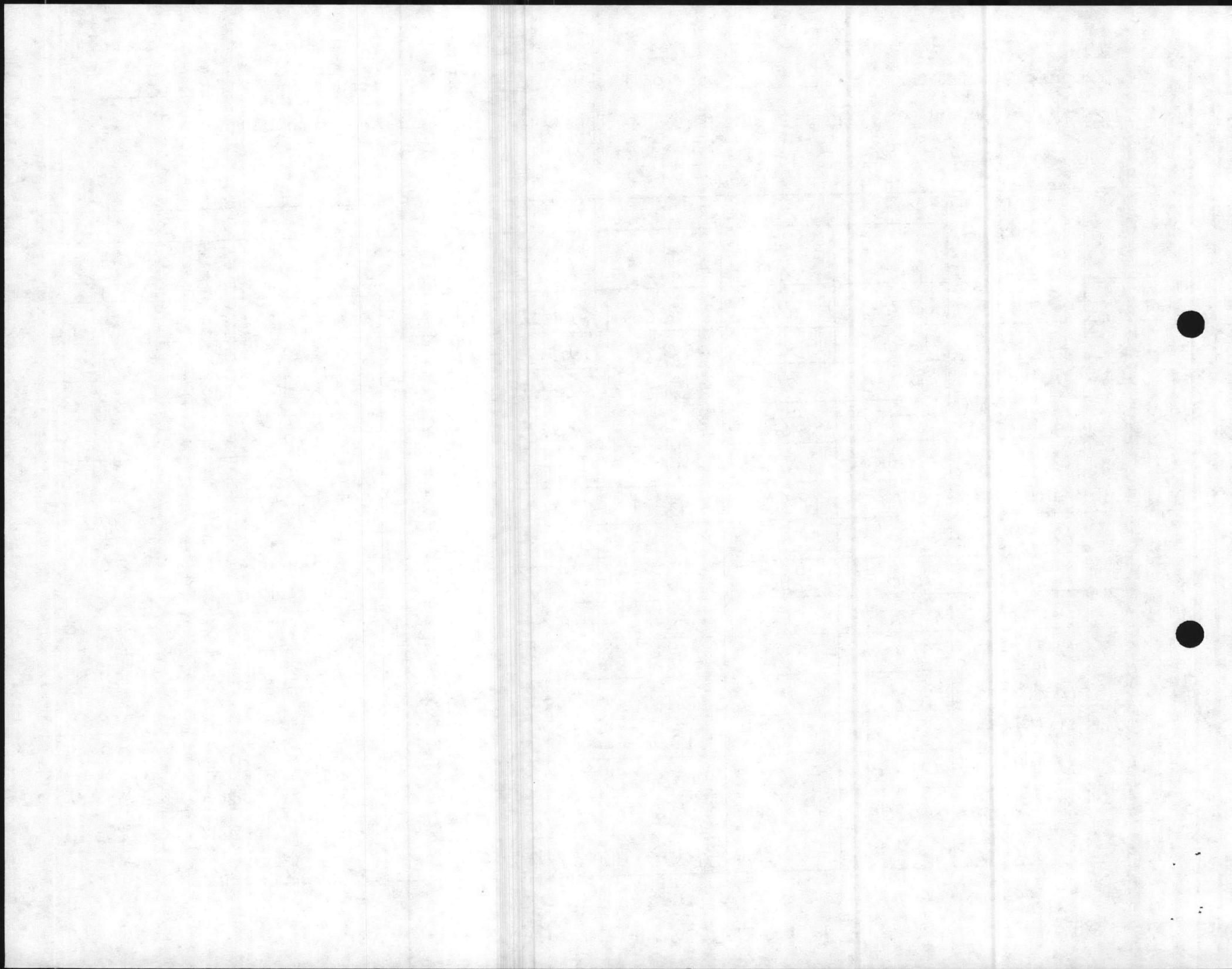


Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine
 Date: 4-22-87 Report No. 539 to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 4

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

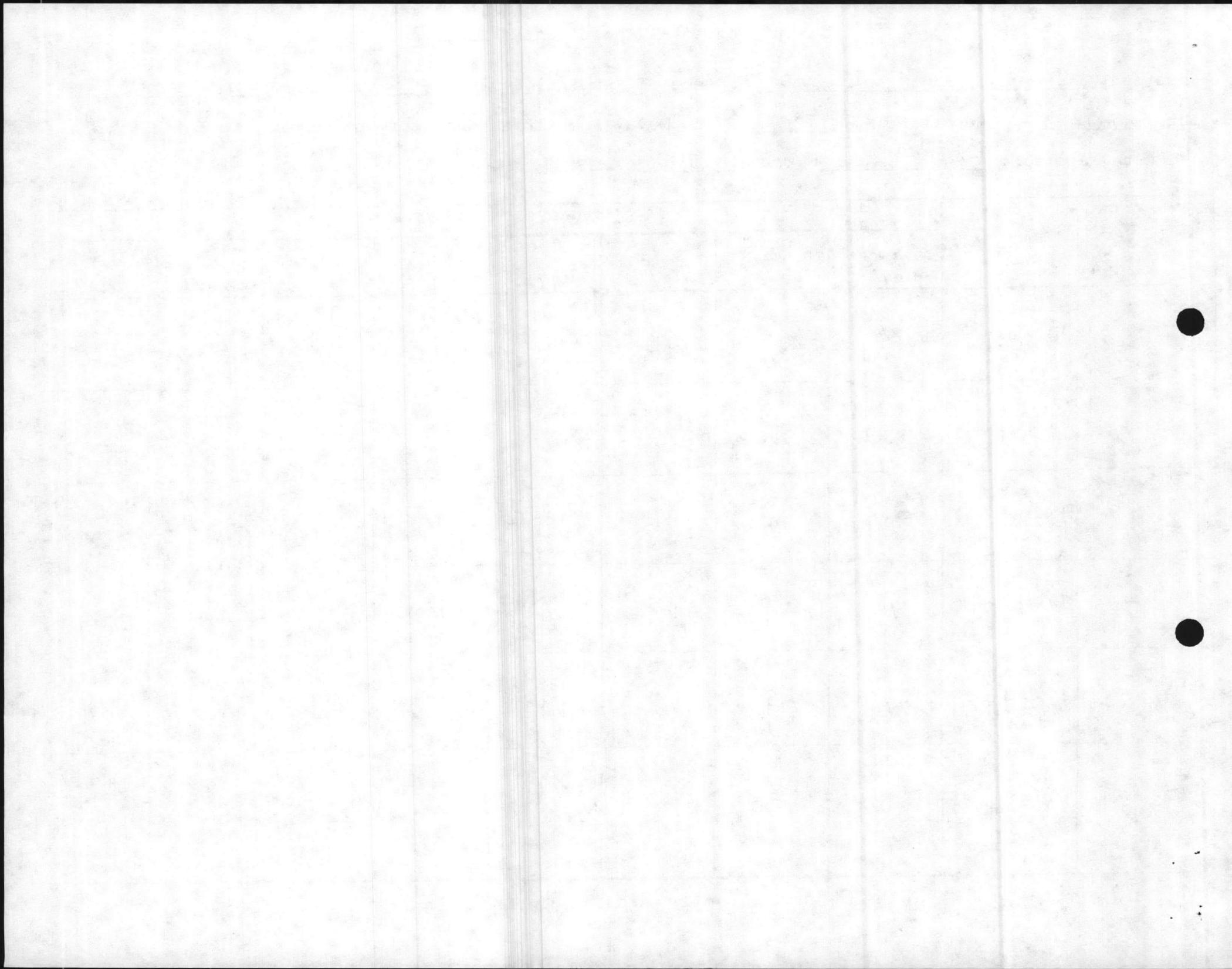
* insufficient sample volume to do analysis
 NA = not available, will be reported in separate addendum



Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routineDate: 4-22-87 Report No. 539 to Naval Facilities Engineering Command, Norfolk, VirginiaJTC Data Report No. 87-132 Table 5

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

NA = not available, will be reported in separate addendum



CASE # 539 Addendum
LABORATORY ANALYSIS ON
NAVAL SAMPLES
(A/E CONTRACT N62470-84-B-6932)
JTC REPORT # 87-132

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

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

JUNE 17, 1987

Ann E. Rosecrance
Ann E. Rosecrance
Laboratory Director

Attachment B



JTC Environmental Consultants, Inc.

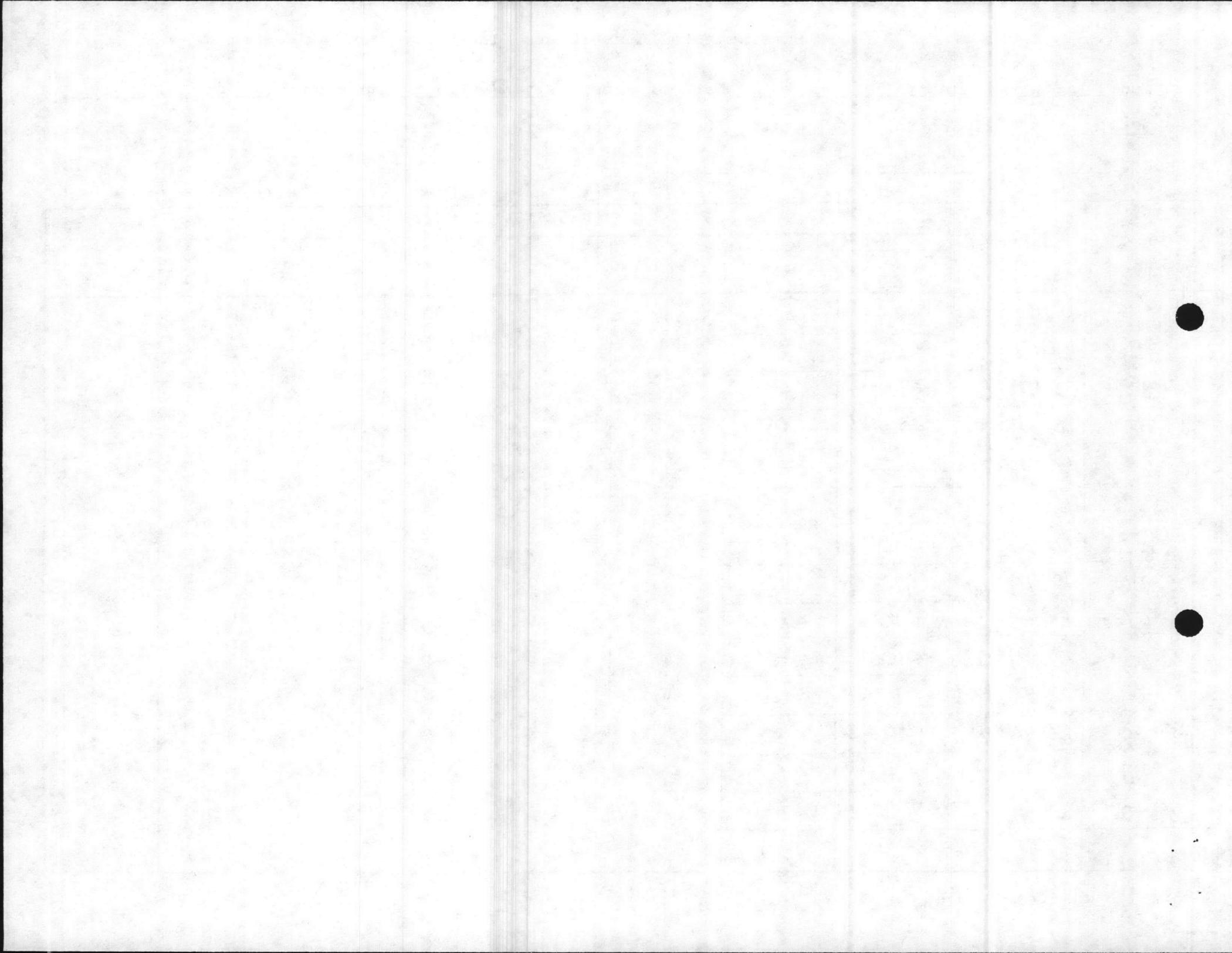
Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

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

JTC Data Report No. 87-132 Table 1

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

* sample depleted, unable to do analysis



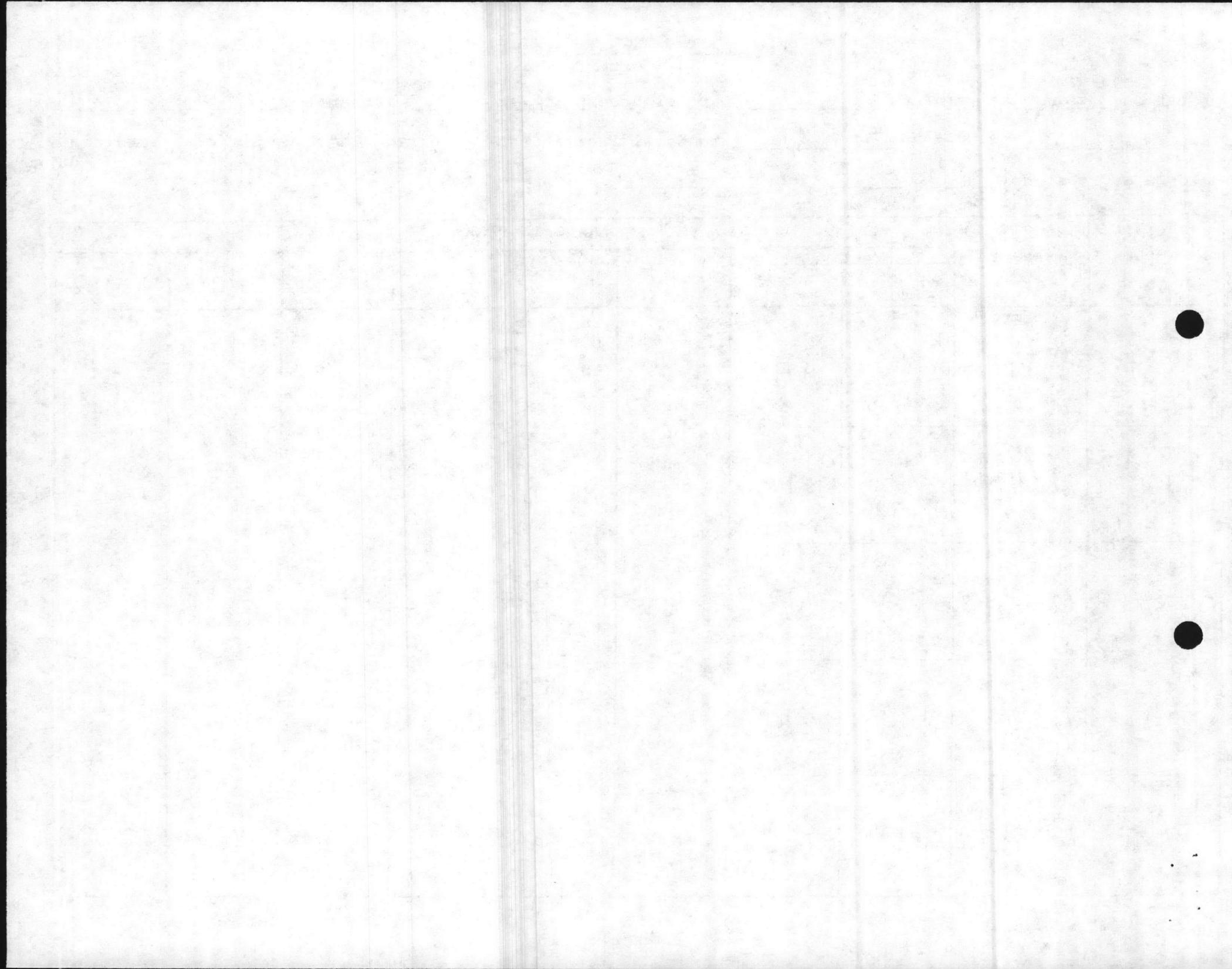
JTC Environmental Consultants, Inc.

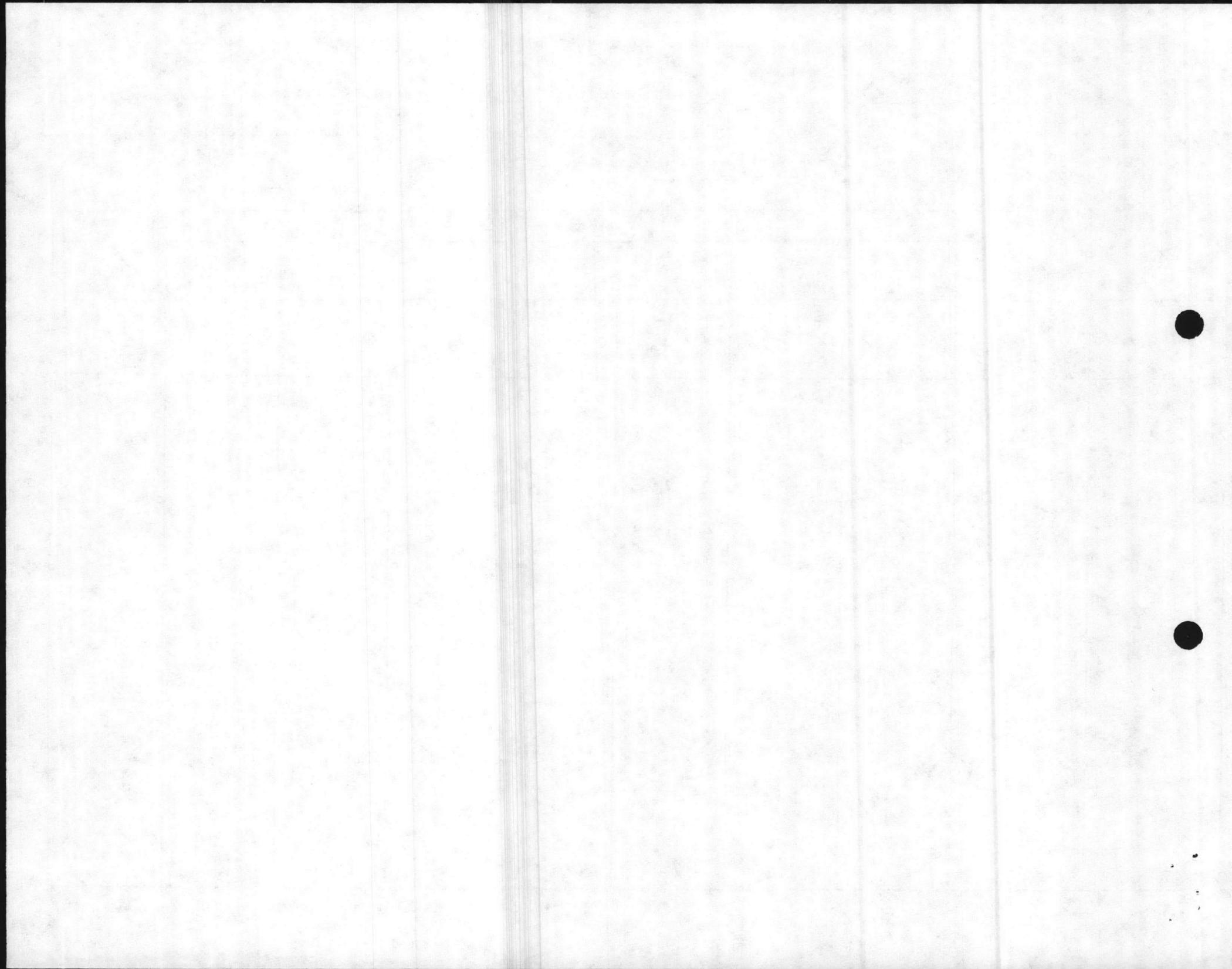
Location: Camp Lejeune Date of Receipt: 2-26-87 Turnaround: routine

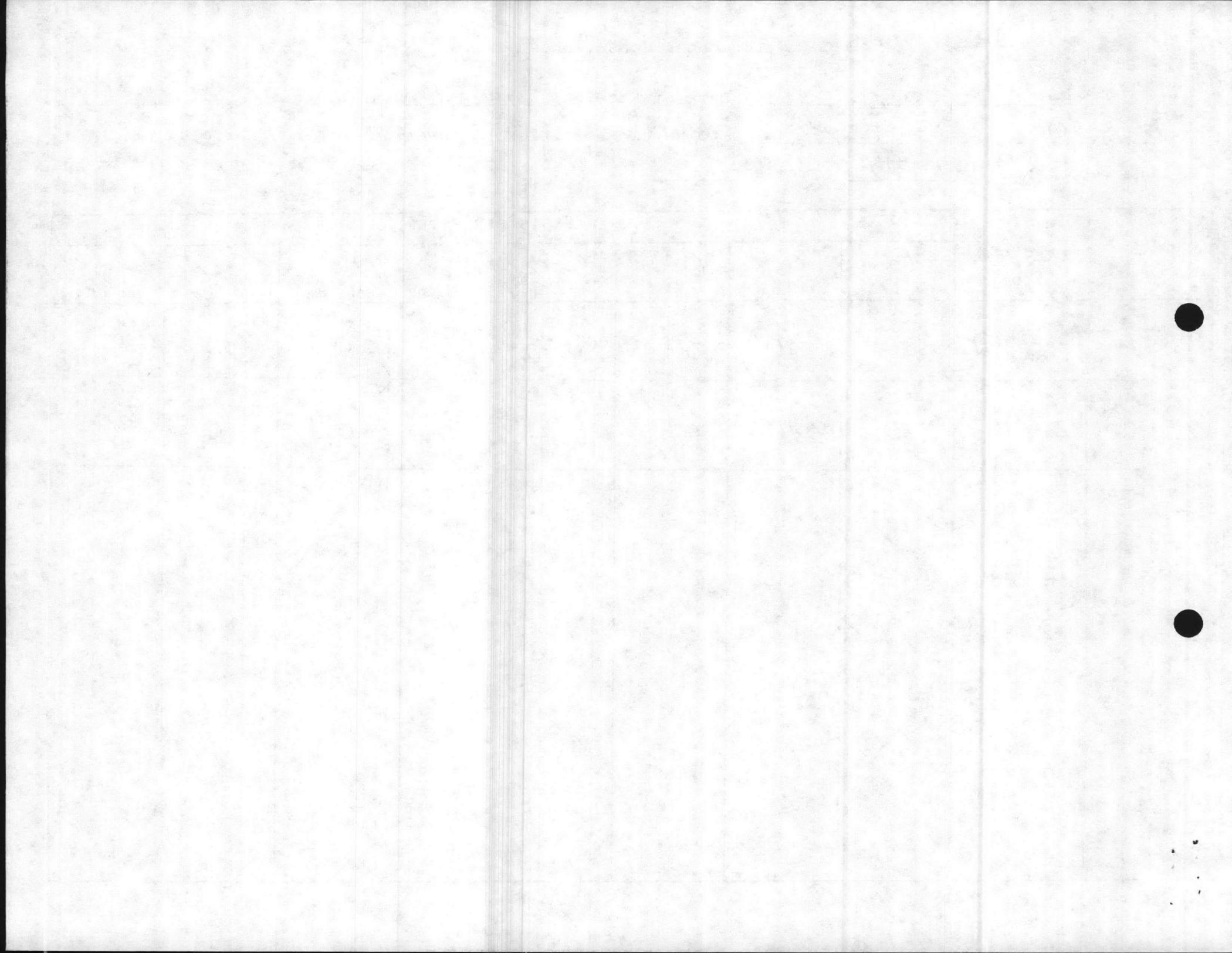
Date: 6-17-87 Case No. 539 Add. to Naval Facilities Engineering Command, Norfolk, Virginia

JTC Data Report No. 87-132 Table 2

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







SLW

Davy DRS



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

IN REPLY REFER TO:

6280

GSO

4 SEP 1987

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

Subj: SAMPLING RESULTS

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

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

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

B. D. Waddell
B. D. WADDELL

UNITED STATES MARINE CORPS
HEADQUARTERS MARINE CORPS
WASHINGTON, D.C. 20380

SEP 1987

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

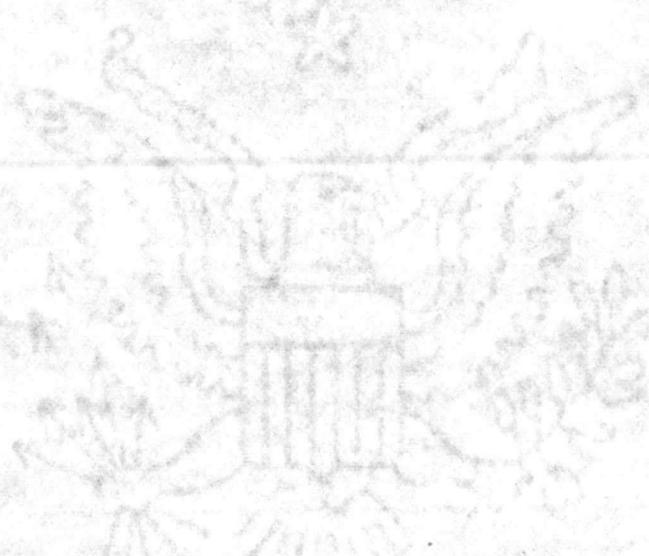
Subject: CAMP LEJUNE RESURFACING

Re: (a) CO, MCRB, DA Ltr 0280 GEO of 17 Oct 86

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

2. It is requested that this General be officially advised of the status of the samples so that disposal action may be initiated to comply with the limitations. Point of contact is Jerry West, telephone 3205/6036.

[Handwritten Signature]
D. D. WADSWORTH



JWW

*Da
DDG* of *Glenée*

For info - Nat Res - Ch

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

6280
GSO
4 SEP 1987

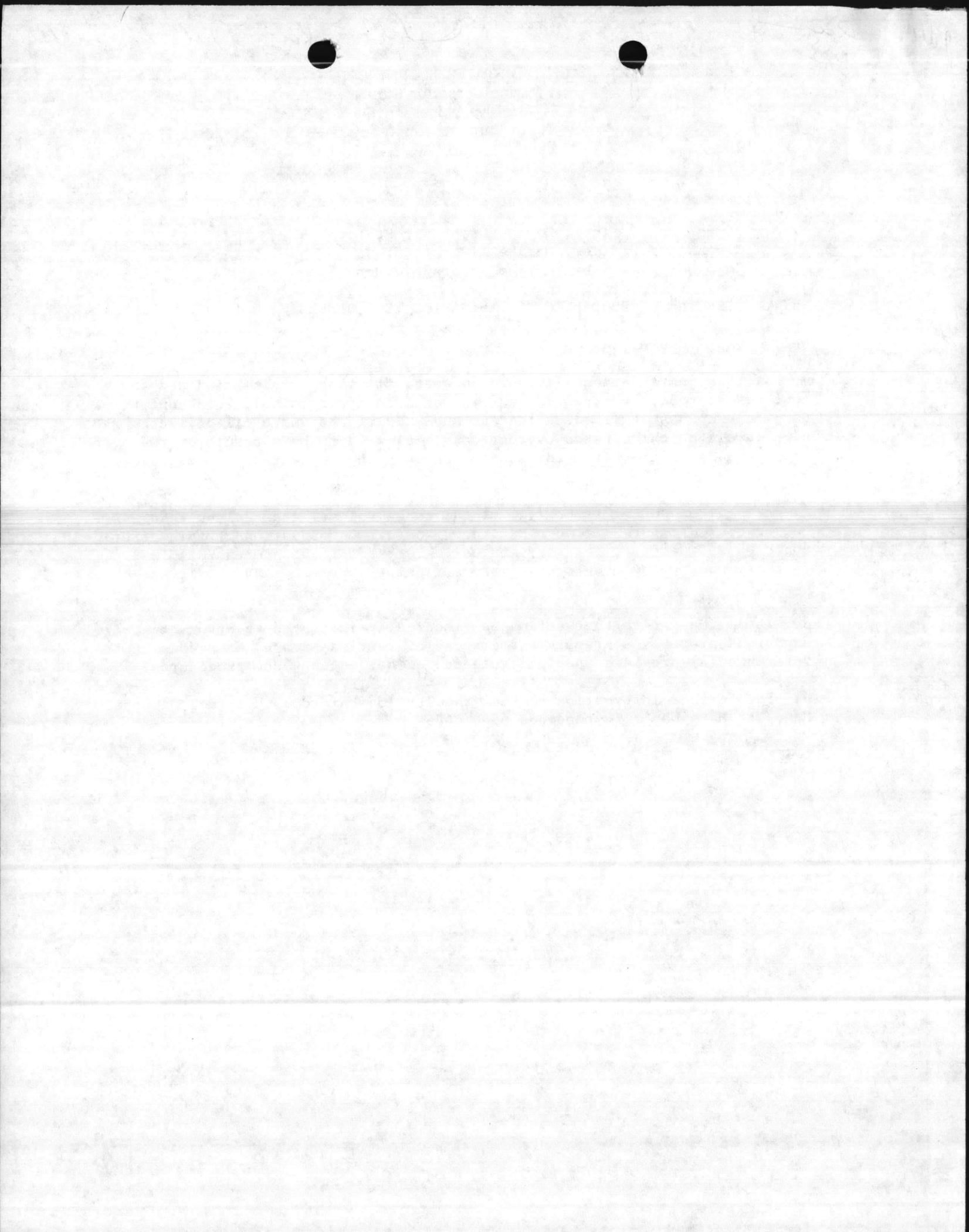
From: Commanding Officer, Marine Corps Air Station, New River
To: Commanding Officer, Marine Aircraft Group 26
Commanding Officer, Marine Aircraft Group 29

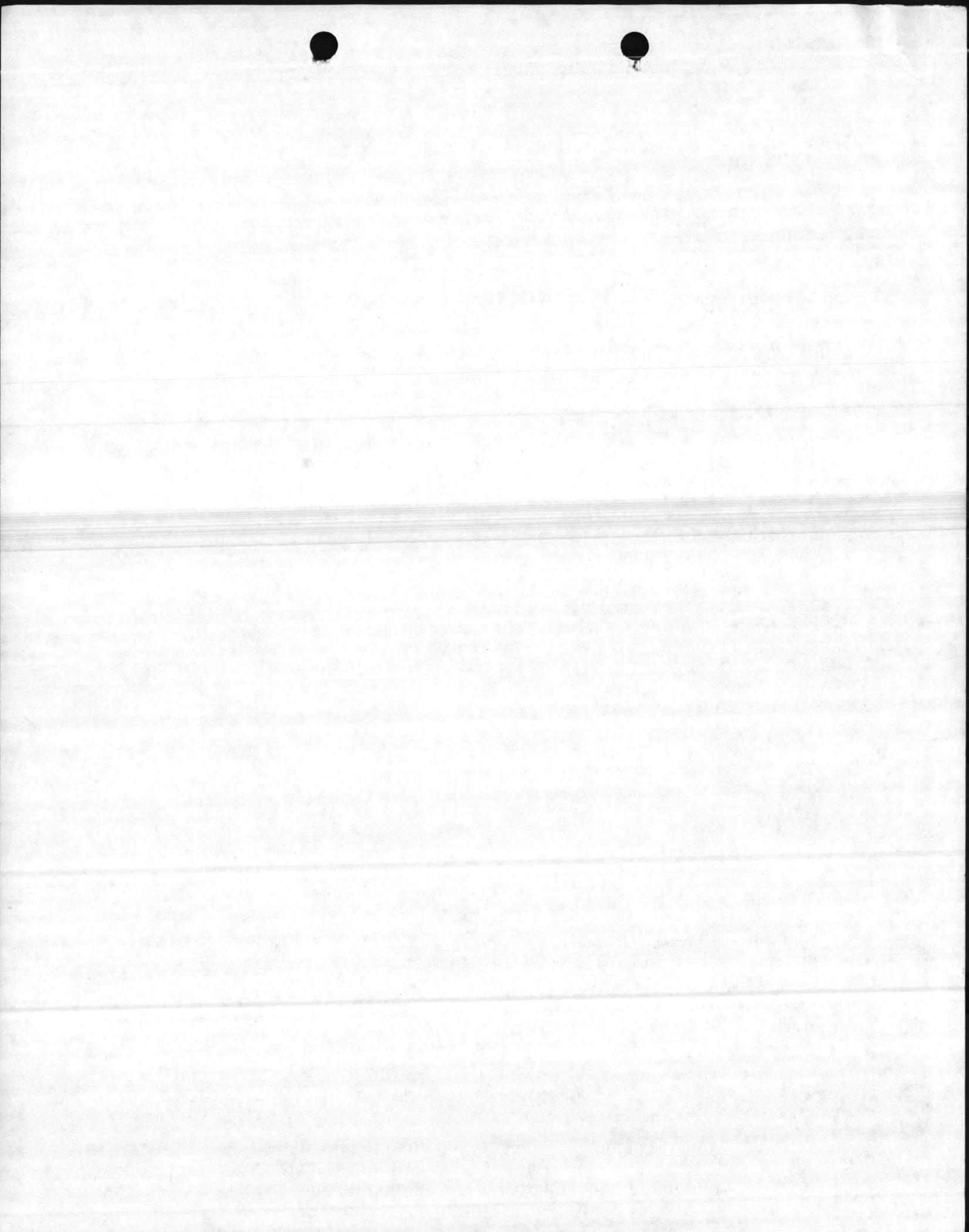
Subj: DISPOSAL OF HYDRAULIC CONTAMINATION TEST SAMPLES

Ref: (a) ASO 6280.1A

1. At this installation all squadron waste oil tanks are emptied and the contents stored in central collection tanks until it is sold to a contractor. Camp Lejeune has notified us that an analysis of the waste oil collected shows high levels of chlorinated hydrocarbons, believed to be a result of the freon and hydraulic fluids from the subject tests being deposited into waste oil tanks.
2. A small amount of freon (.1% of the total volume) can reclassify a 240 gallon tank of waste oil as a hazardous waste. Continuation of this practice could cause the state to determine us to be a treatment/storage/disposal facility and subject us to even more stringent controls than we already operate under.
3. It is imperative that action be immediately initiated to ensure that all squadrons properly segregate and dispose of test samples as hazardous waste. Reference (a) provides specific guidance on hazardous waste procedures.
4. For further information contact the Station Hazardous Material Disposal Manager, Mary Wheat, extensions 6506/6686.

B. D. WADDELL





File
Fill Hg Waste

A 7/6



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

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

September 1, 1987

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

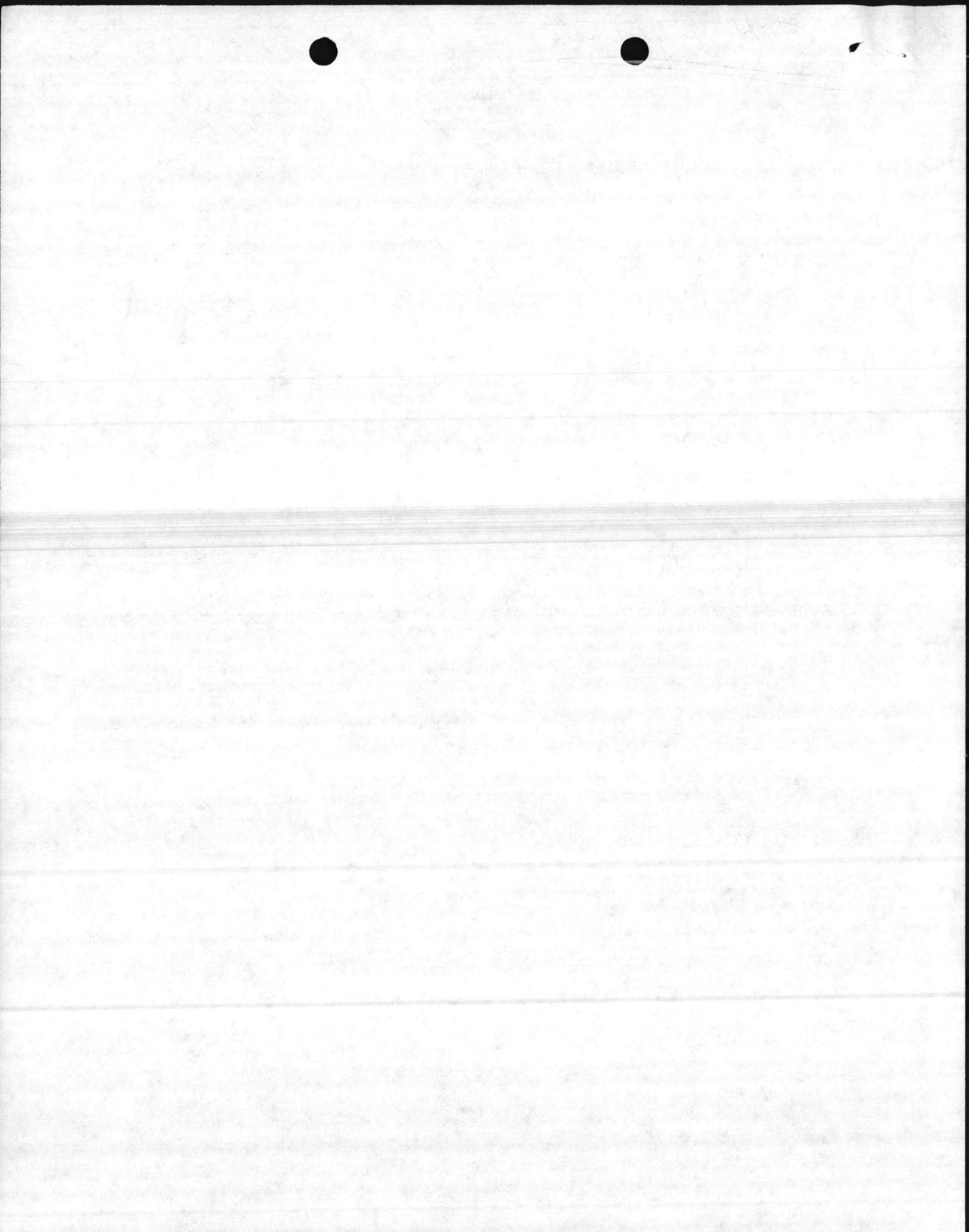
SUBJECT: Annual Fees Billing for Handlers of Hazardous Waste

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

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

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

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





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

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

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

SEPTEMBER 1, 1987

INVOICE

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

NC6170022580
US Marine Corps Base
Facilities Dept.
Camp LeJeune

NC 28542

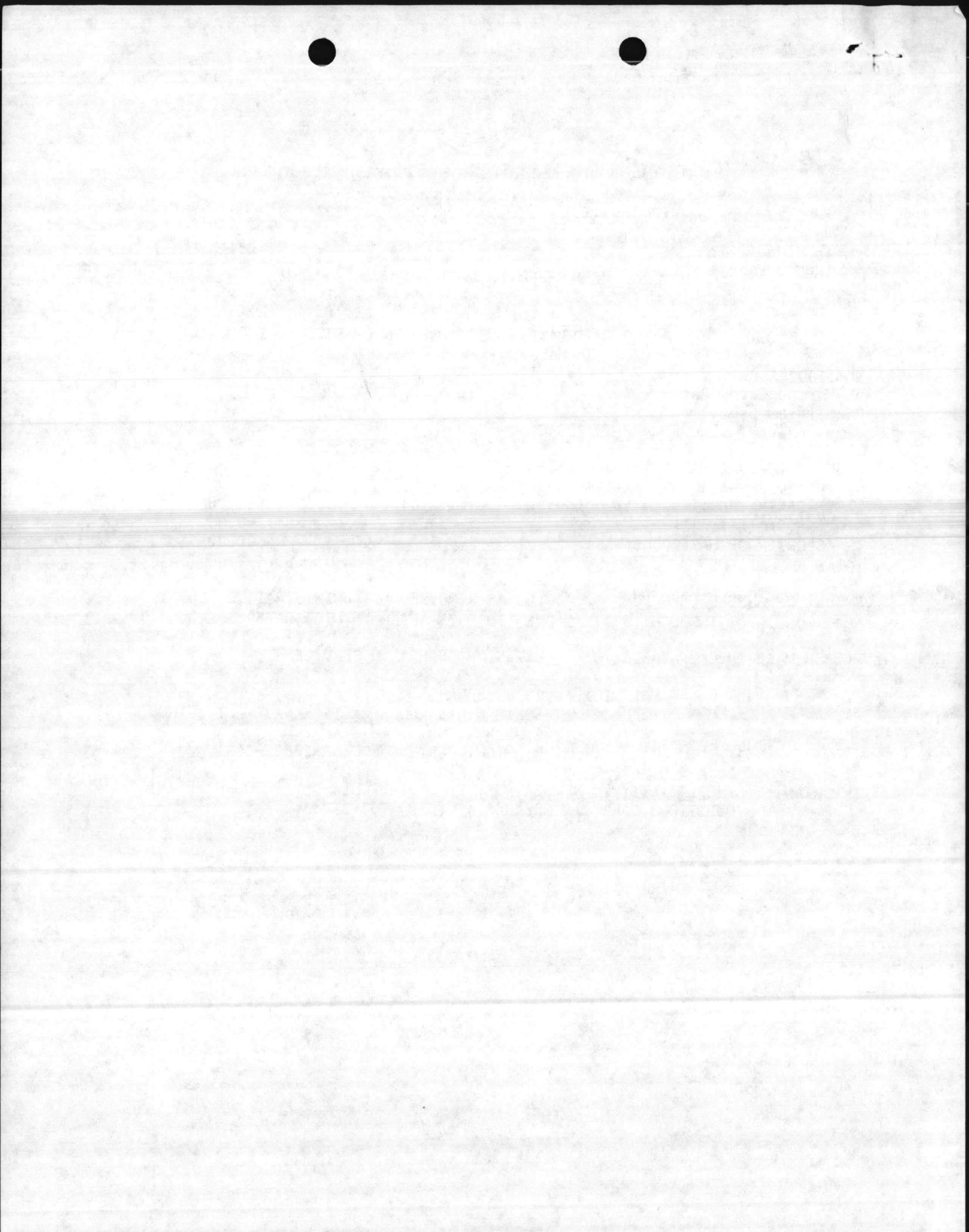
DESCRIPTION OF CHARGES	RATE	QTY. (TONS)	AMOUNT
GENERATOR OF HAZARDOUS WASTE			\$600.00
WASTE GENERATED	\$0.50	64	\$32.00
STORAGE FACILITY			\$1,200.00
TRANSPORTER OF HAZARDOUS WAS			\$600.00
TOTAL AMOUNT DUE			\$2,432.00

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

PLEASE MAKE CHECK PAYABLE TO: DIVISION OF HEALTH SERVICES

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

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



105/ T-6240
ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 6/28/87

TO:

BASE MAINT O

DIR, FAMILY HOUSING

PUBLIC WORKS O

DIR, BACHELOR HOUSING

COMM-ELECT O

BASE FIRE CHIEF

DIR., NAT. RESOURCES & ENV. AFFAIRS

ATTN: Hay Mat'l Info

1. Attached is forwarded for info/action

Julian,

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

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

If so, please do. I have some
background info on SARA, but SJA

3. Your file copy.

has a complete set of these Ref's.

✓R
SJA

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

SJA } furnished
BASE safety } COPY



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PAGE	DTG RELEASER TIME	PRECEDENCE	CLASS	SPE DAT	UMF	CIC	ORIG MSG IDENT
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BOOK ADMIN MESSAGE HANDLING INSTRUCTIONS

FROM: LANTNAVFACENGCOM NORFOLK VA

TO: ABL CUMBERLAND MD

ARMED FORCES EXPERIMENTAL TNG ACTY CAMP PEARY VA

FCTCLANT DAM NECK VA

HPDTA HERTFORD NC

INACTSHIPFAC PORTSMOUTH VA

LANTCOMOPSUPPFAC NORFOLK VA

MARCORB CAMP LEJEUNE NC

MARCORCRUITSTA LOUISVILLE KY

MARCORCRUITSTA RICHMOND VA

MARCORCRUITSTA SOUTH CHARLESTON WV

MARCORESTRACEN BALTIMORE MD

MARCORESTRACEN LYNCHBURG VA

MARCORESTRACEN RICHMOND VA

MARCORESTRACEN ROANOKE VA

MARCORESTRACEN SOUTH CHARLESTON WV

MCAS CHERRY POINT NC

MCAS NEW RIVER NC

NAVAVNDEPOT CHERRY POINT NC

NAVAVNDEPOT NORFOLK VA

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DISTR.

NAVGRAM

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

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

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

R. D. Crowson

UNCLASSIFIED 1142/6 6/11/87



JOINT MESSAGE FORM

SECURITY CLASSIFICATION UNCLASSIFIED

DATE	TIME	PRECEDENCE	CLASS	EXCEPT	AMP	CC	ORG. INCIDENT
02	08	RR	UUUU				

BOOK MESSAGE HANDLING INSTRUCTIONS

ADMIN

FROM: NAS NORFOLK VA (2 CYS)

TO: NAS OCEANA VA

NAVCOMMSTA ROOSEVELT ROADS RQ

NAVHOSP CAMP LEJEUNE NC

NAVHOSP PORTSMOUTH VA

NAVMARCORESCEN LITTLE CREEK VA

NAVMARCORESCEN LOUISVILLE KY

NAVMARCORESCEN NEWPORT NEWS VA

NAVMARCORESCEN RICHMOND VA

NAVMARCORESCEN ROANOKE VA

NAVMARCORESCEN WHEELING WV

NAVORDSTA LOUISVILLE KY

NAVPHIBASE LITTLE CREEK VA

NAVRADSTA R SUGAR GROVE WV

NAVRADTRANSFAC DRIVER VA

NAVRESCEN BALTIMORE MD

NAVRESCEN CUMBERLAND MD

NAVRESCEN HUNTINGTON WV

NAVRESCEN LEXINGTON KY

NAVRESCEN PARKERSBURG WV

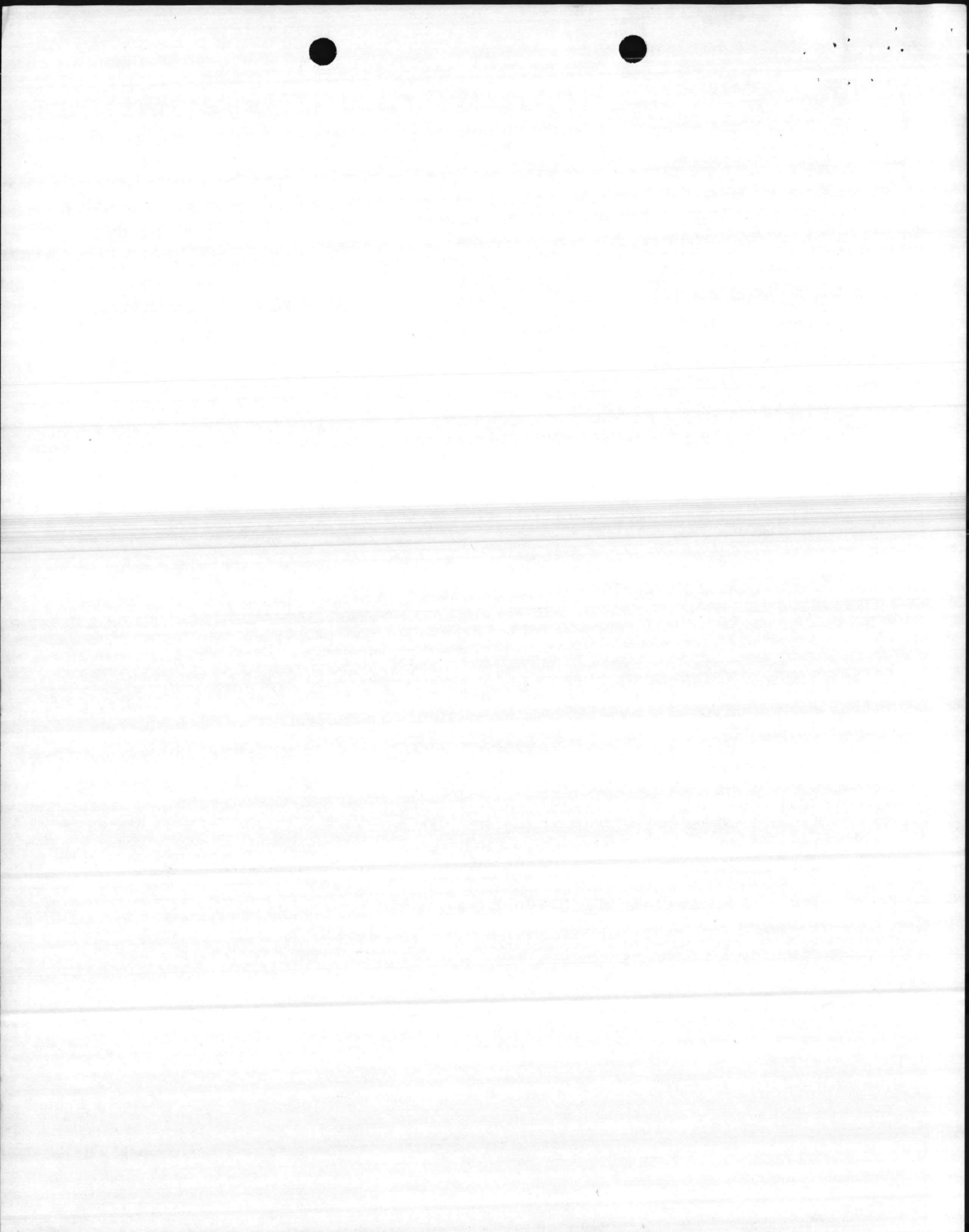
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DISTR

PREPARED BY NAME, TITLE, OFFICE SYMBOL, PHONE

SPECIAL INSTRUCTIONS

NAVGRAM



JOINT MESSAGE FORM

SECURITY CLASSIFICATION
UNCLASSIFIED

DATE	TIME	RELEASE TIME	PRECEDENCE	CLASS	SPECIAL	LINE	CC	ORG. ABBREVIATION
03	08		RR	UUUU				

BOOK MESSAGE HANDLING INSTRUCTIONS
ADMIN

FROM: NAVRESCEN SOUTH CHARLESTON WV

TO: NAVRESCEN STAUNTON VA

NAVSECGRUACT NORTHWEST VA

NAVSECGRUACT SABANA SECA RQ

NAVSHIPYD NORFOLK VA

NAVSTA NORFOLK VA

NAVSTA ROOSEVELT ROADS RQ

WPNSTA YORKTOWN VA

NSC NORFOLK CHEATHAM ANNEX VA

NSC NORFOLK VA

PWC NORFOLK VA

SUPSHIP NEWPORT NEWS VA

CNTT BAINBRIDGE MD

INFO CNO WASHINGTON DC (OP-45)

CINCLANTFLT NORFOLK VA

CMC WASHINGTON DC

CNET PENSACOLA FL

CHNAVPERS WASHINGTON DC

COMNAVAVIRLANT NORFOLK VA

COMNAVVAIRSYS COM WASHINGTON DC

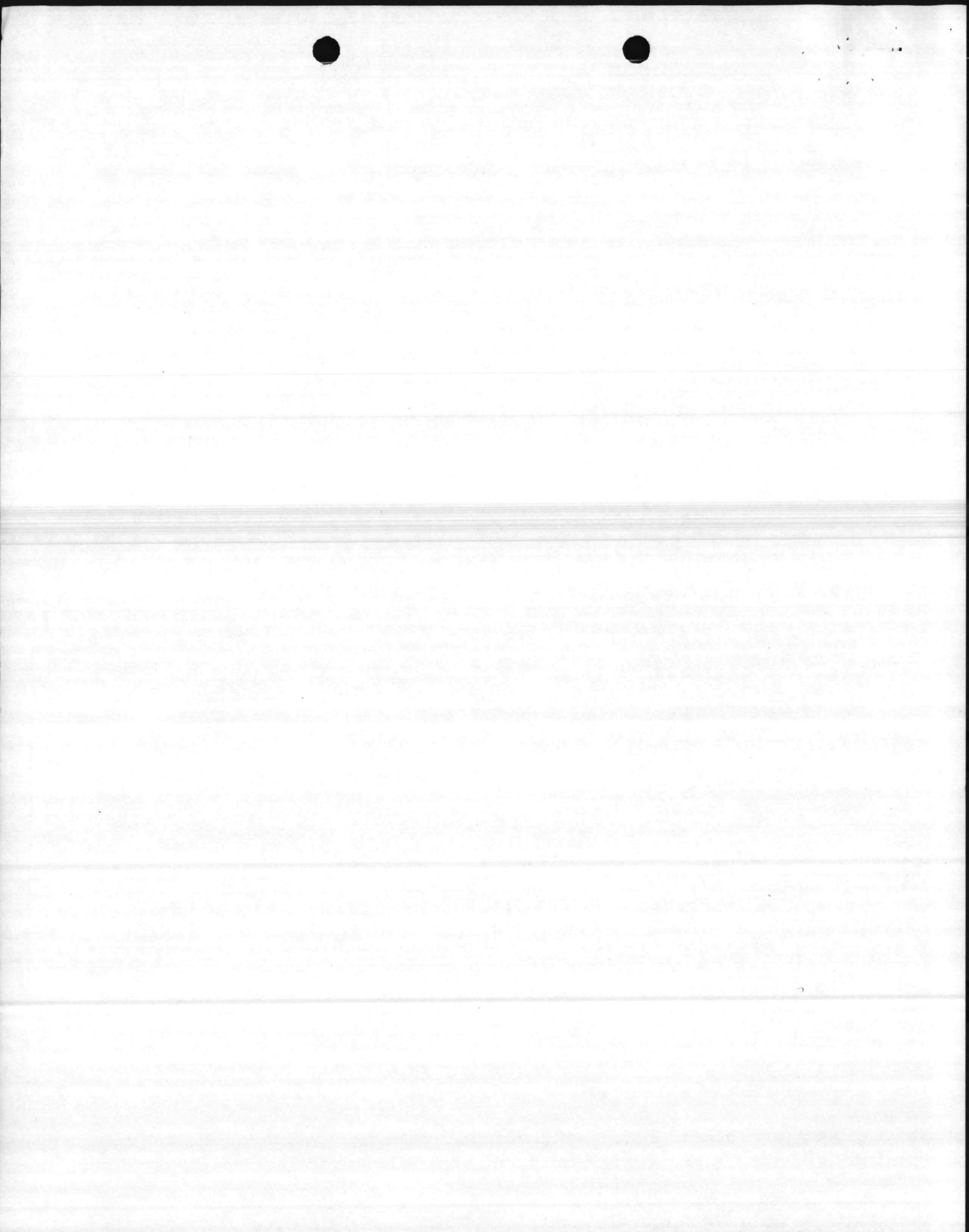
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DISTR:

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

SPECIAL INSTRUCTIONS

NAVGAAM



JOINT MESSAGE FORM

SECURITY CLASSIFICATION
UNCLASSIFIED

SIG RELEASE TIME			PRECEDENCE	CLASS	OPERAT	LIVE	CIC	CRIC/NO IDENT
DATE	TIME	MONTH	YR	ACT	SEQ			
04	08			RR	UUUU			

LOOK MESSAGE HANDLING INSTRUCTIONS

ADMIN

FROM: COMNAVBASE NORFOLK VA

TO: COMNAVFACENGCOM ALEXANDRIA VA

COMNAVFORCARIB ROOSEVELT ROADS RQ

COMNAVOCEANSYSLANT NORFOLK VA

COMNAVSEASYS COM WASHINGTON DC

COMNAVSECGRUCOM WASHINGTON DC

COMSUBLANT NORFOLK VA

COMNAV SUPSYS COM WASHINGTON DC

COMNAVSURFLANT NORFOLK VA

COMNAVTELECOM WASHINGTON DC

COMTRALANT NORFOLK VA

NAVCAMS LANT NORFOLK VA

NAVMEDCOM WASHINGTON DC

NAVMEDCOMMIDLANTREG NORFOLK VA

NAVS AFCEN NORFOLK VA

NEESA PORT HUENEME CA

NAVENVIRHLTHCEN NORFOLK VA

NSC NORFOLK VA (CRANEY ISLAND FUEL TERMINAL)

SOUTHNAVFACENGCOM CHARLESTON SC

NORTHNAVFACENGCOM PHILADELPHIA PA

DISTR:

DRAFTER TYPED NAME TITLE OFFICE SYMBOL PHONE

SPECIAL INSTRUCTIONS

NAVGRAM

6
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Bob Alexander

05	08	RR	UUUU
----	----	----	------

ADMIN

FROM: WESTNAVFACENGCOM SAN BRUNO CA
 TO: PACNAVFACENGCOM PEARL HARBOR HI
 CHESNAVFACENGCOM WASHINGTON DC

UNCLAS //N06280//

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

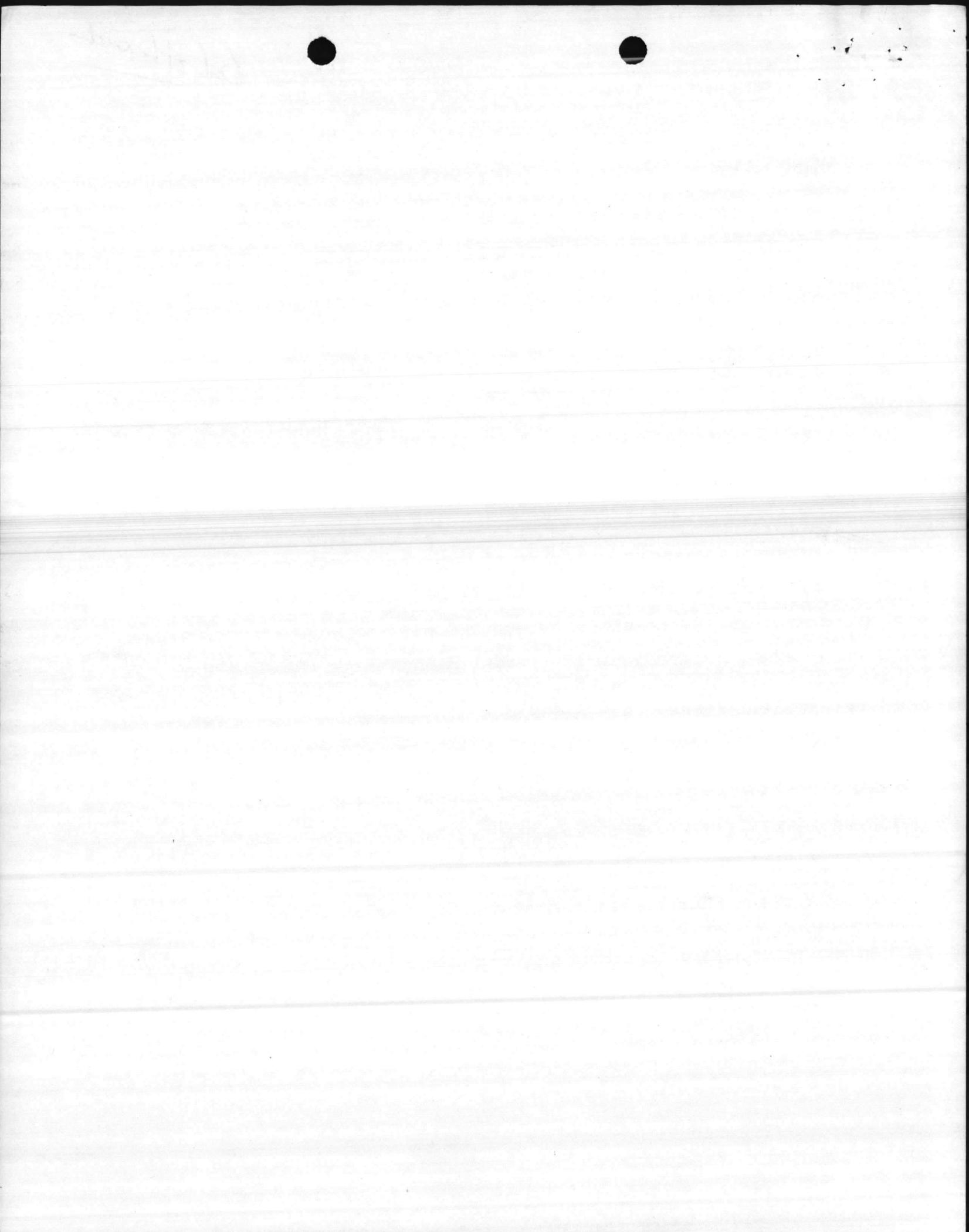
- A. PHONCON COMNAVFACENGCOM (MR. BRIAN HIGGINS) /
LANTNAVFACENGCOM (MR. PAUL RAKOWSKI) OF 5 JUN 87
- B. 40 CFR 300, SUBPART I-EMERGENCY PLANNING AND COMMUNITY
RIGHT-TO-KNOW, FEDERAL REGISTER, 12 DEC 86
- C. 40 CFR PARTS 300 AND 365, NCP AND EMERGENCY PLANNING AND
NOTIFICATION, FEDERAL REGISTER, 22 APR 87
- D. DRAFT 40 CFR 370, HAZARDOUS CHEMICAL, REPORTING: COMMUNITY
RIGHT-TO-KNOW, FEDERAL REGISTER, 30 JAN 87

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0
1. WE HAVE RECEIVED VARIOUS INQUIRIES CONCERNING COMPLYING WITH
 INFORMATIONAL AND RELATED REQUESTS UNDER THE SUBJECT SECTION 302 OF
 SARA. WRITTEN POLICY GUIDANCE IS IN PREPARATION AT THE WASHINGTON
 LEVEL OF THE NAVY AND DOD. IN THE INTERIM, WE RECOMMEND THAT YOU

ENRATER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

SPECIAL INSTRUCTIONS

NAVGRAM



JOINT MESSAGE FORM

SECURITY CLASSIFICATION
UNCLASSIFIED

06	08	DATE TIME	MONTH	YEAR	RR	UUUU			
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ADMIN

MESSAGE HANDLING INSTRUCTIONS

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

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

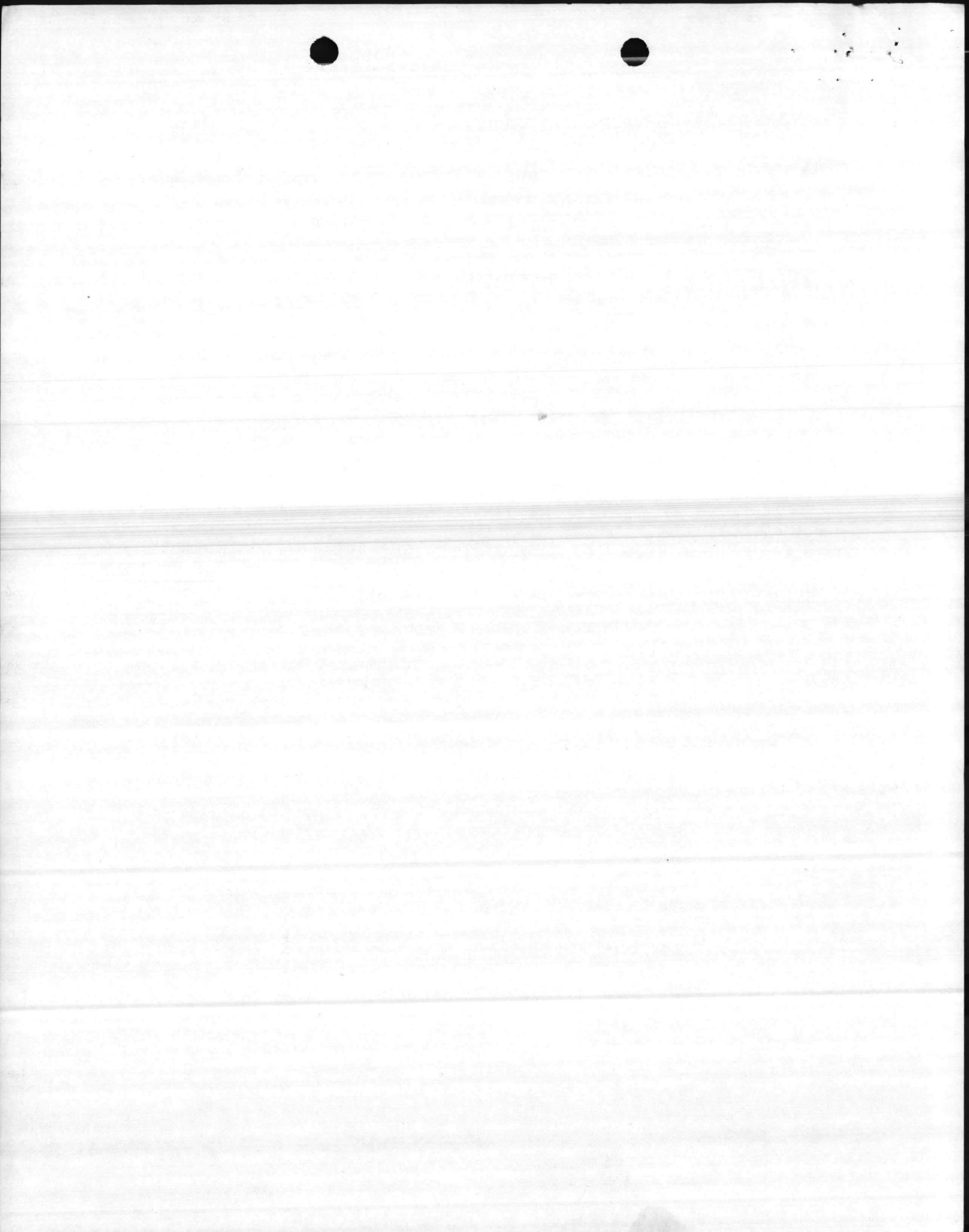
3. WE RECOMMEND THAT YOU RESPOND IN WRITING TO ANY REQUESTS RECEIVED UNDER THE SUBJECT SECTION OF SARA AND INCLUDE THESE GENERAL STATEMENTS:

DISTR.

OFFICER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

SPECIAL INSTRUCTIONS

NAVGRAM



JOINT MESSAGE FORM

SECURITY UNCLASSIFIED

07 08	DATE-TIME	MONTH	YR	RR	PRECEDENCE	CLASS	SERIAL	LMP	OD	ORIG MSG IDENT
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HOOK ADMIN MESSAGE HANDLING INSTRUCTIONS

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

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

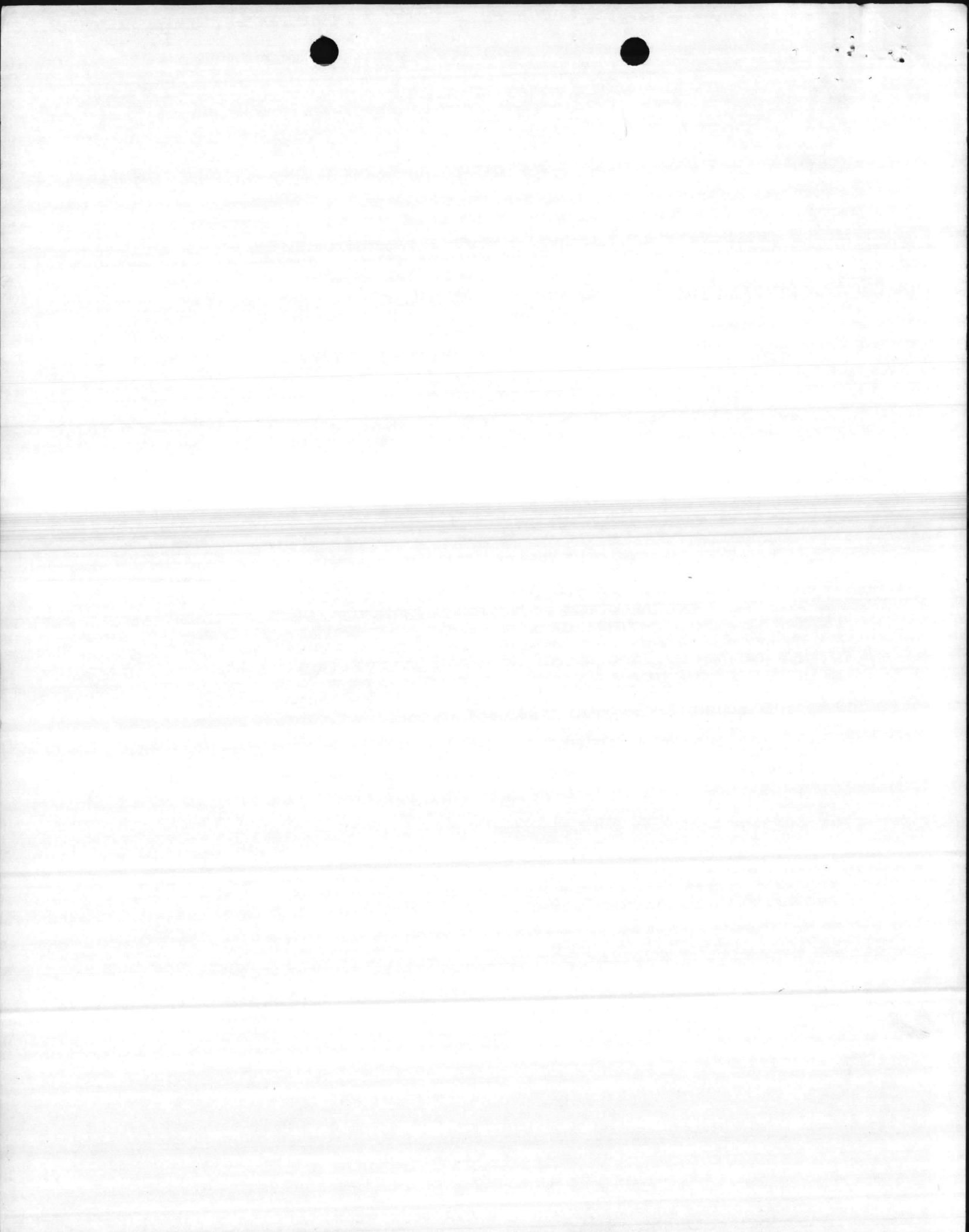
C. WE WILL NOTIFY YOU JUST AS SOON AS THE POLICY IS RECEIVED. OUR COMMITMENT TO THE TITLE III REQUIREMENTS IS NOT TO BE ASSUMED TO BE NEGATIVE DUE TO THIS POLICY ABBERRATION. IF YOU ARE, OR WILL BE, DEVELOPING AREA/LOCAL EMERGENCY RESPONSE ORGANIZATIONS, WE WILL BE WILLING TO ATTEND AND DISCUSS WITHIN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

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

DRAFTEE TYPED NAME, TITLE OFFICE SYMBOL PHONE	SPECIAL INSTRUCTIONS

NAUGRAM



JOINT MESSAGE FORM

SECURITY CLASSIFICATION
UNCLASSIFIED

DATE-TIME		MONTH	YR	RR	UUUU			
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ADMIN

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

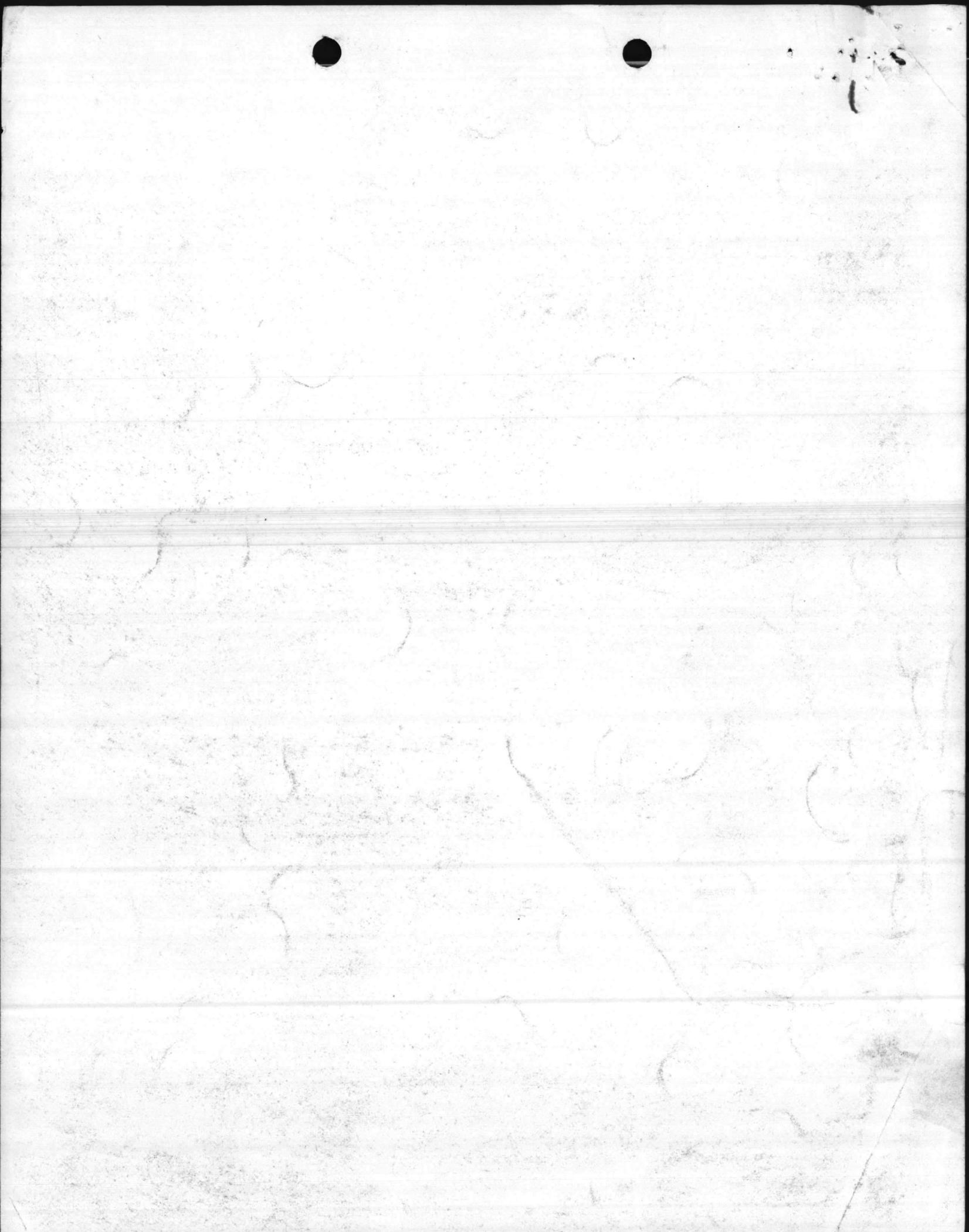
4. IF YOU REQUIRE FURTHER ASSISTANCE OR SUPPORT IN INITIAL MEETINGS WITH THE STATE OR LOCAL AGENCIES PERTAINING TO SARA TITLE III REQUIREMENTS, OUR POINT OF CONTACT IS MR. PAUL RAKOWSKI, AUTOVON 565-2936 OR (804) 445-2936.

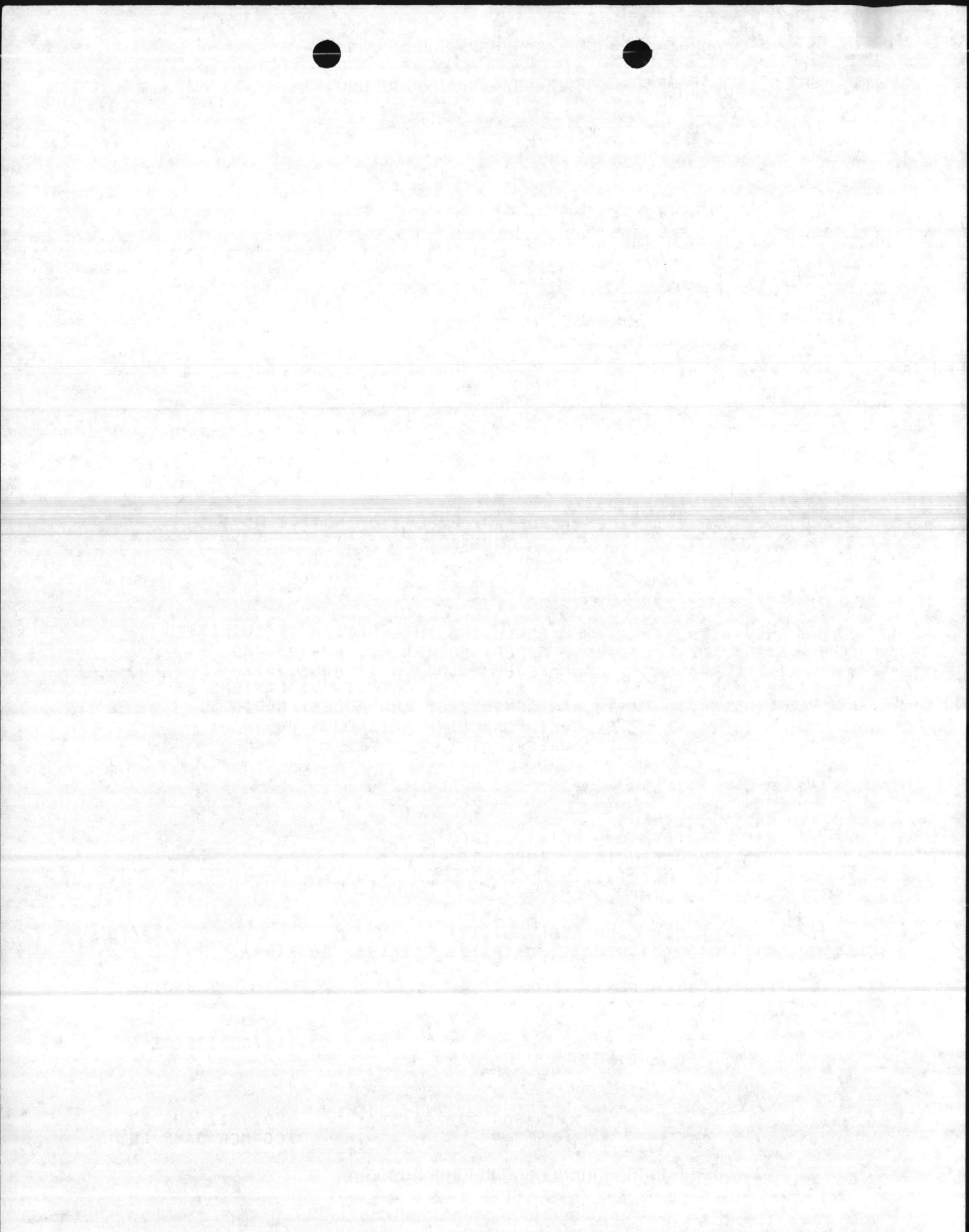
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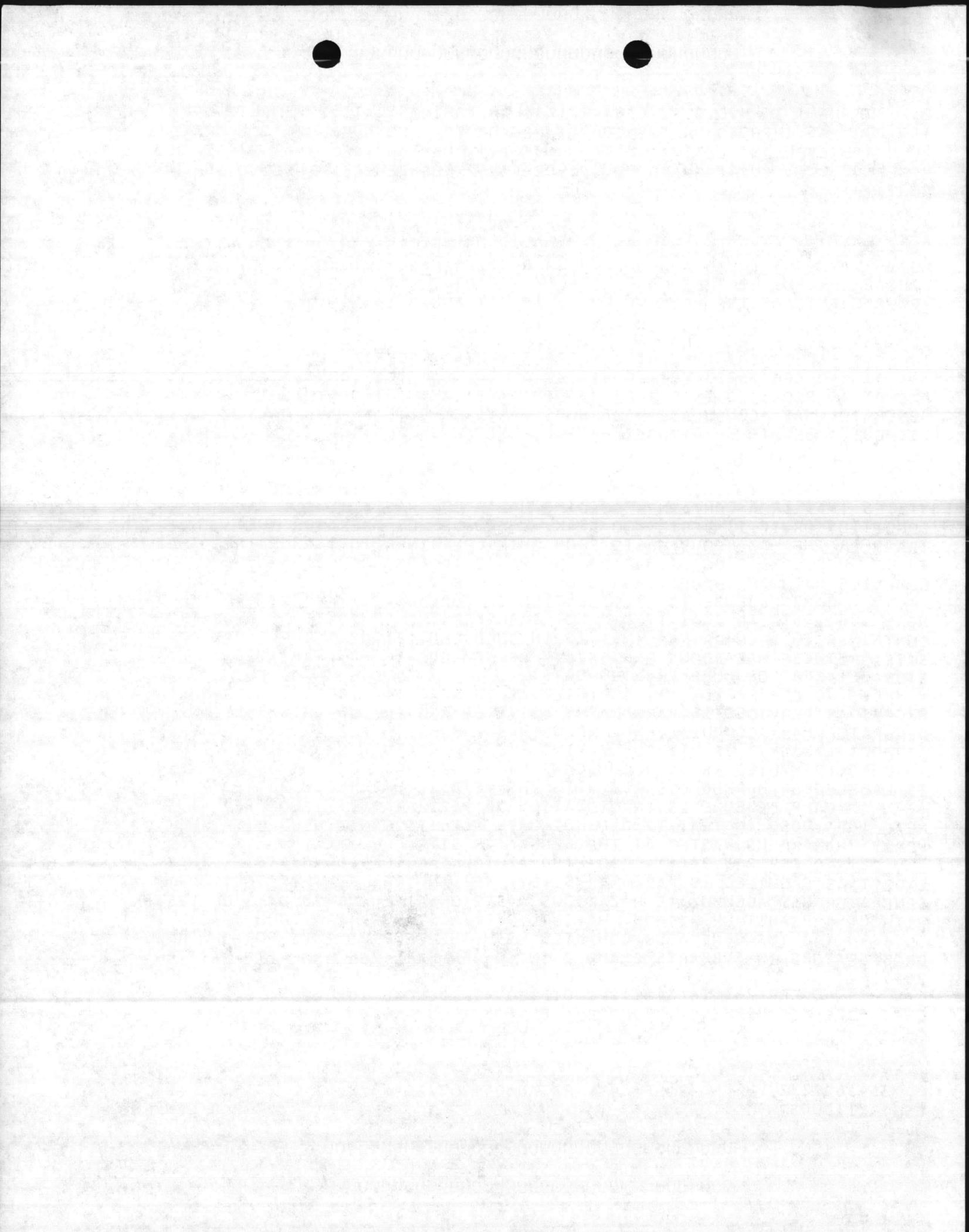
DISTR:

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE 	SPECIAL INSTRUCTIONS
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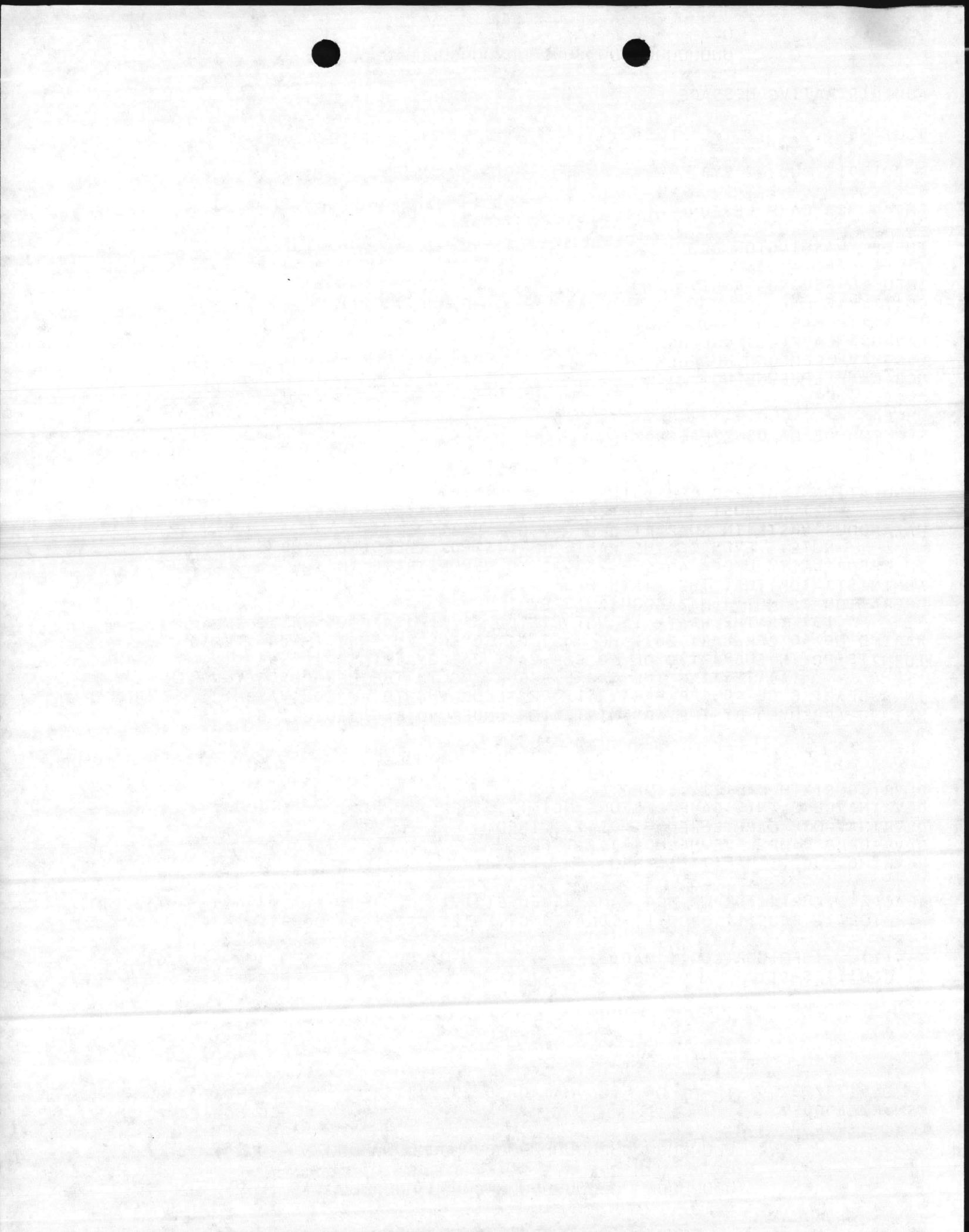
NAVGram

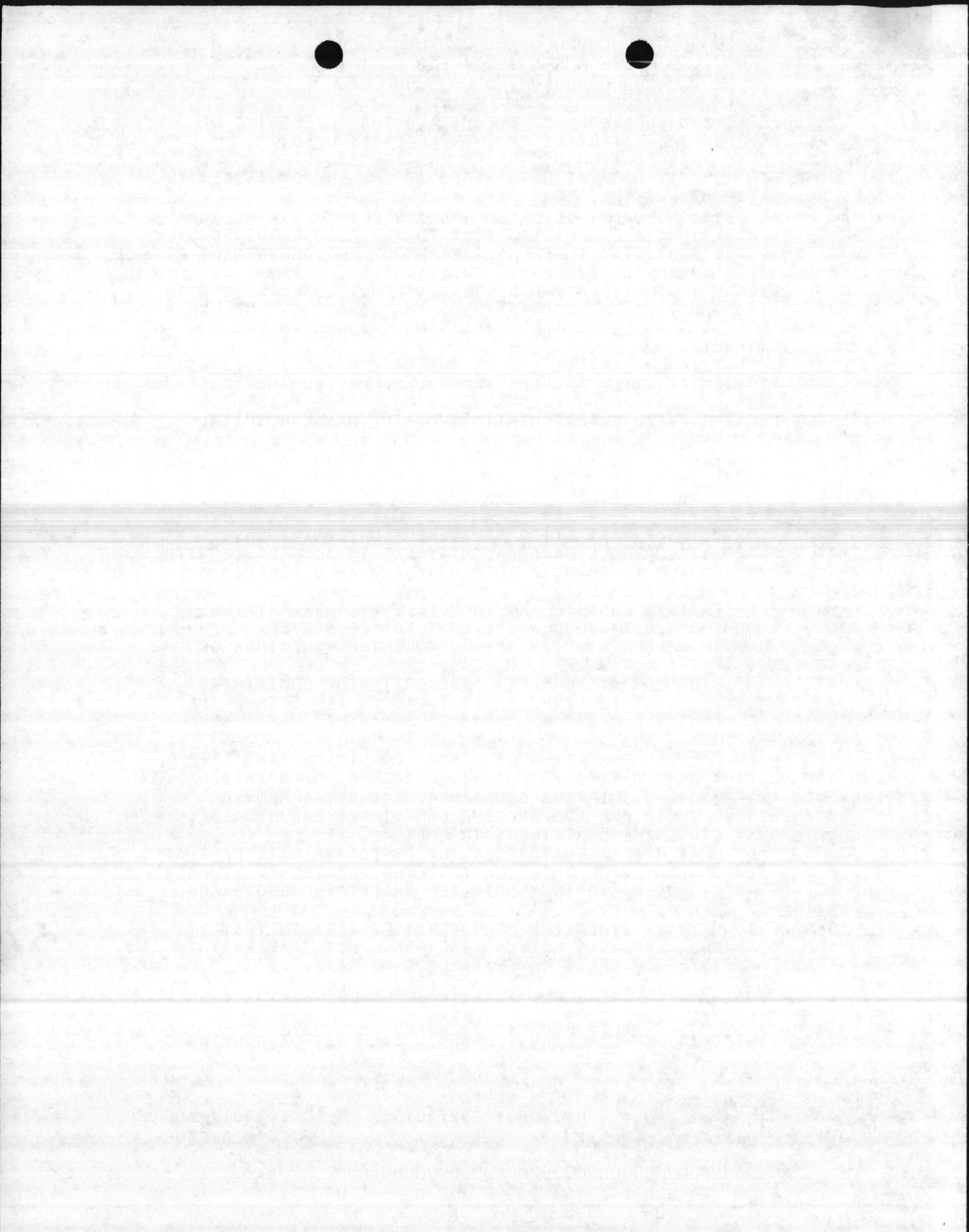


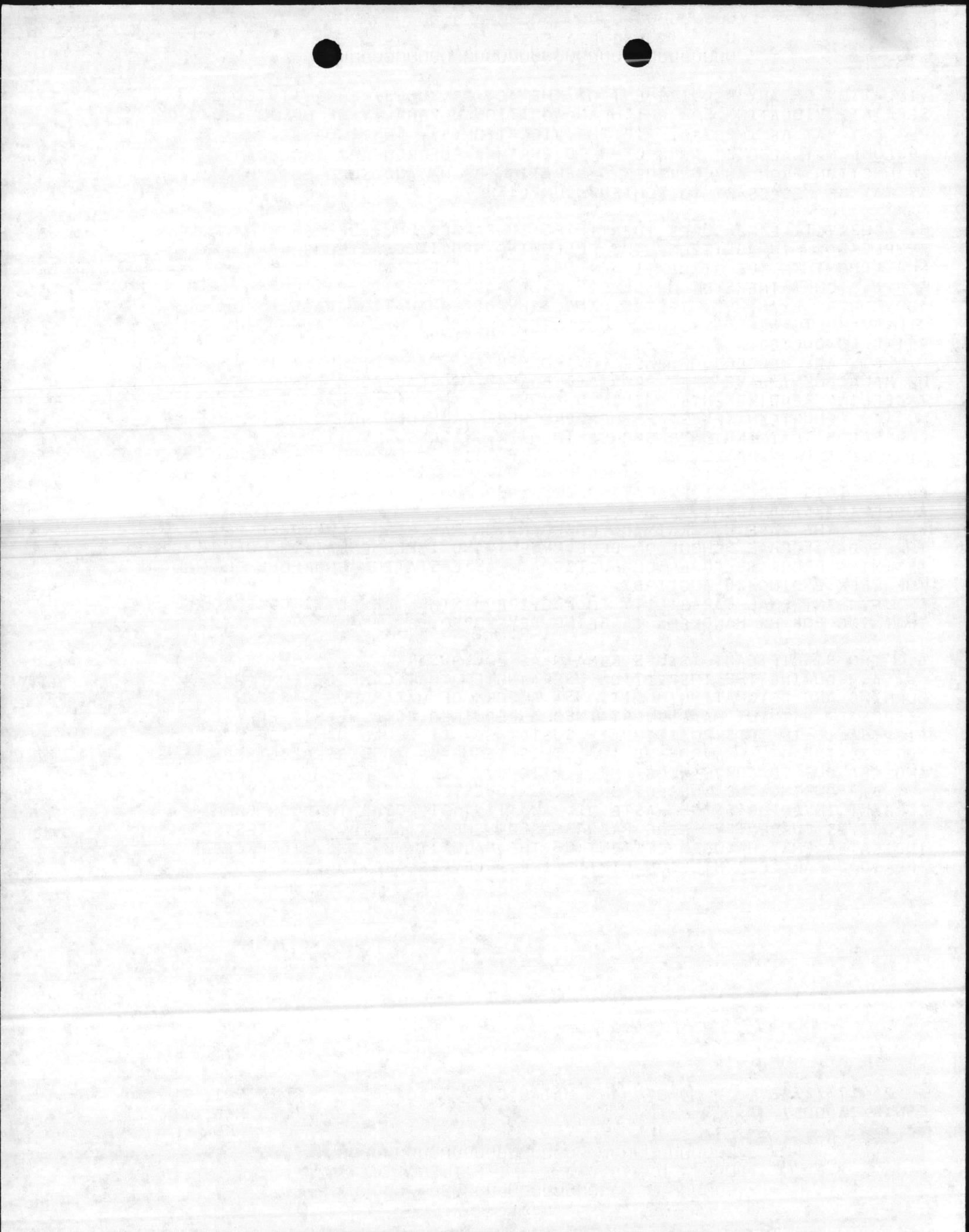


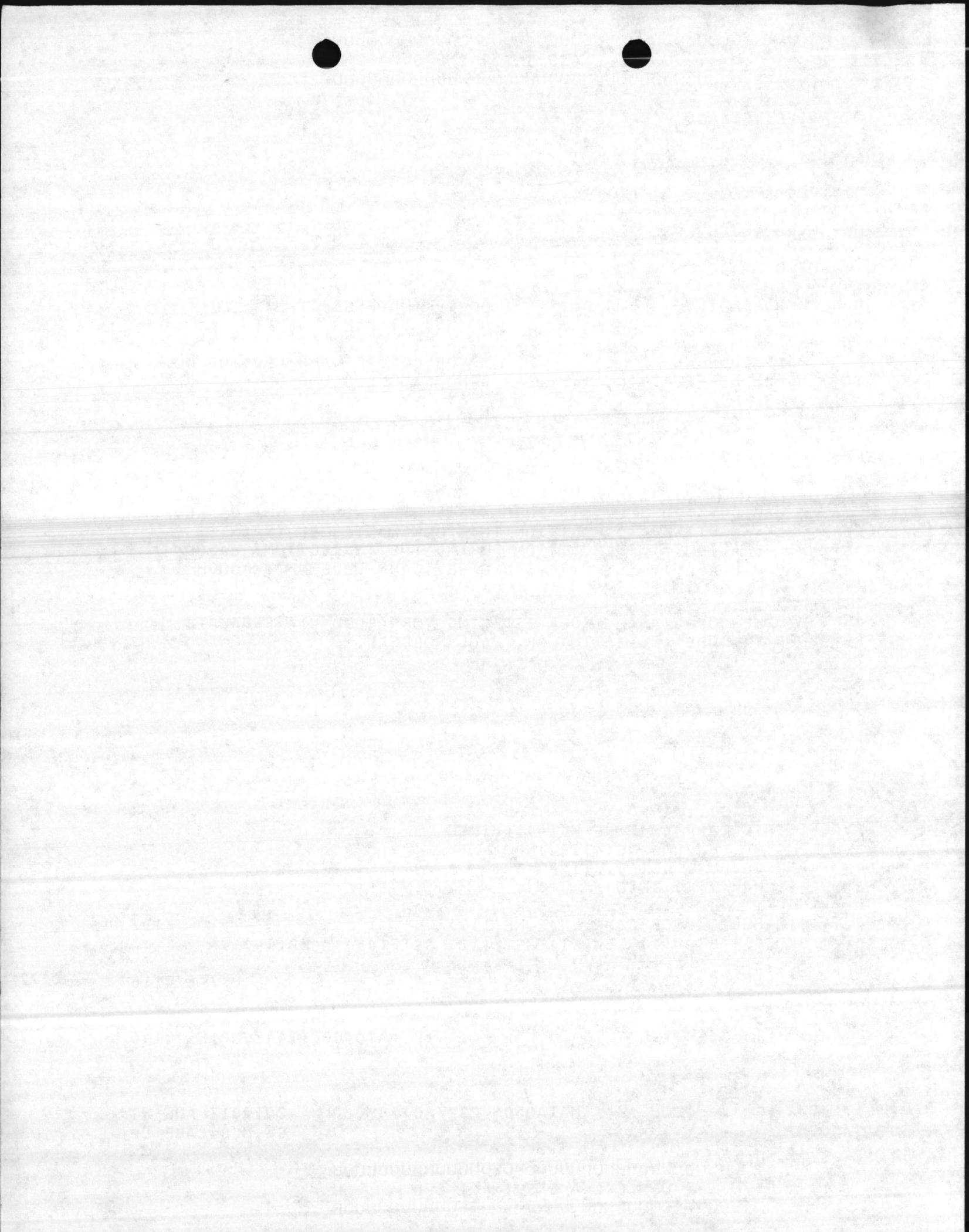












NREAD
28 Aug 87

6240
NREAD
AUG 31 1987

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

JWS
Suppy Ecologist
A

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

Dear Mr. Meyer:

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

- a. The building number for TC 863 has been changed to TP 463.
- b. Enclosure (1) to the application for the subject permit has been revised and is provided as enclosure (1) to this letter.
- c. The position title for Mr. George Eggers, (page 37 of the application for the subject permit) has been changed to Environmental Protection Specialist.

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

Sincerely,

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

Encl:
(1) BO 6240.5A

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

AUG 3 1951

100-100000-100000

[Faint, mostly illegible typed text, possibly a letter or report, with some lines of text visible but too light to transcribe accurately.]

6241/1
NREAD
20 Aug 87

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

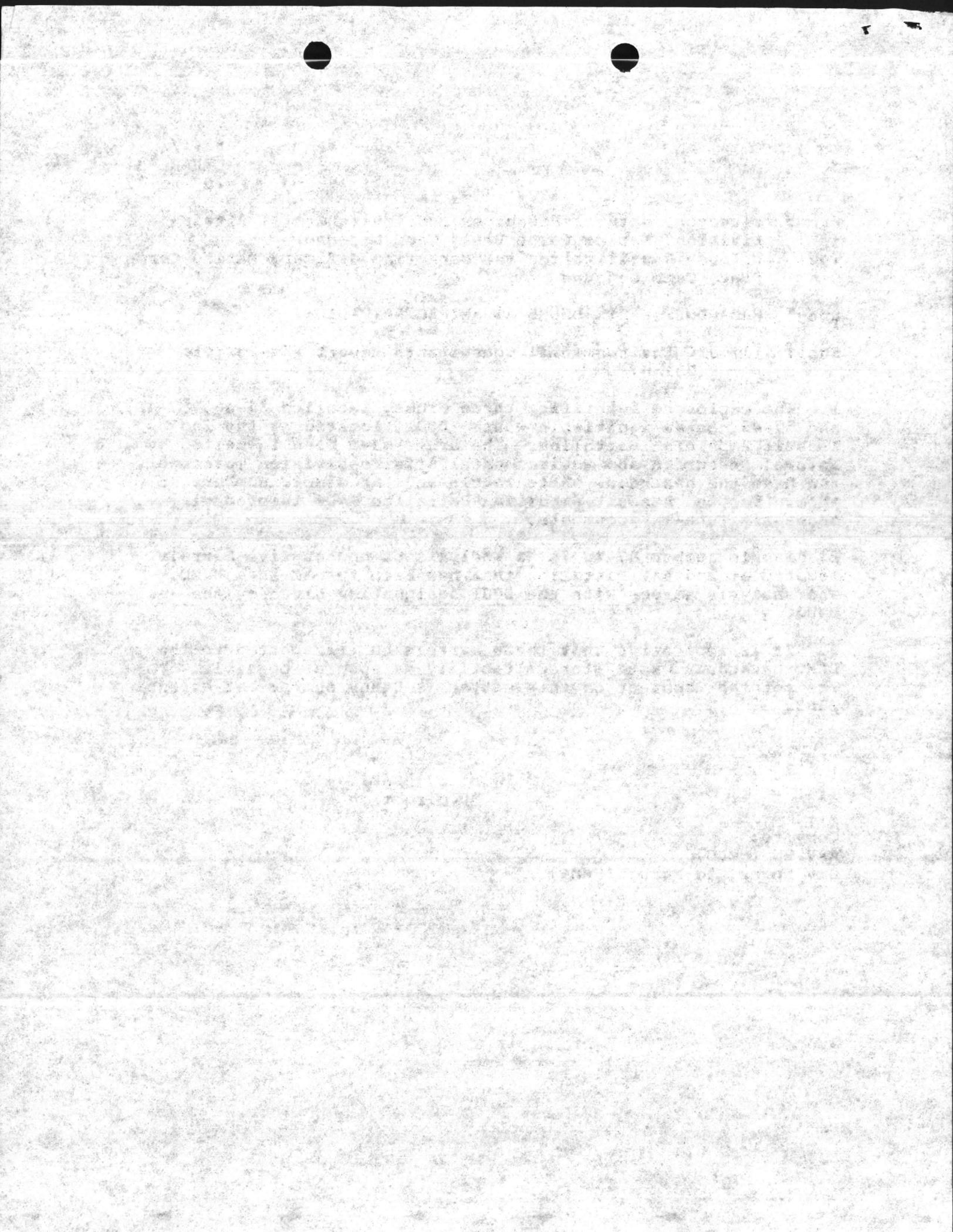
Subj: HAZARDOUS WASTE DRUMS AT ANTRAC BATTALION

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

1. The enclosure identifies three drums, labelled 87-40, 87-42, and 87-43, as an ignitable waste, D001, located at the 2nd Assault Amphibian Battalion. The drums have been inspected by Natural Resources and Environmental Affairs Division personnel, and have the hazardous waste labels and the sample numbers on them. The 2nd Assault Amphibian Battalion HMDO is preparing necessary turn-in documents.
2. Sample number 87-48 is an analysis of one of five barrels located at 2nd AAV Battalion that has been turned into DRMO. The analysis agrees with the D001 designation given by the HMDO.
3. It is imperative that these barrels be transported to the DRMO hazardous waste storage facility as soon as possible. The point of contact on this matter is Danny Sharpe, at extension 2083.

D. D. SHARPE
By direction

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



JTC DATA REPORT # 87-259
LABORATORY ANALYSIS ON NAVAL SAMPLES
CONTRACT #N62470-86-C-8754
CASE # 47

PREPARED FOR:

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

PREPARED BY:

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

JULY 9, 1987

Ann E Rosecrance
Ann E. Rosecrance
Laboratory Director

ENCLOSURE (1)



ENCLOSURE 41

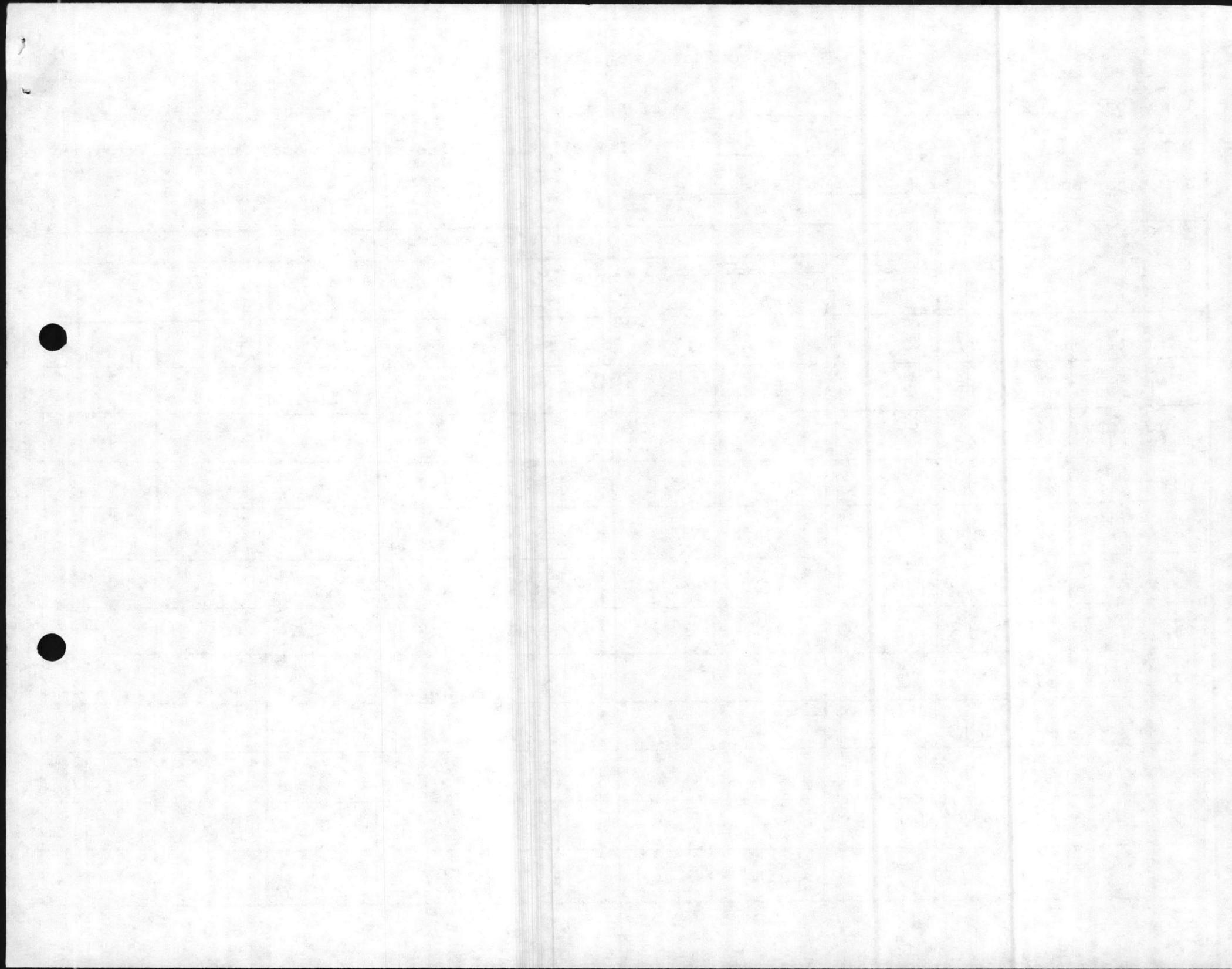
JTC Environmental Consultants, Inc.

Location: Camp Lejeune Date of Receipt: 6-8-87 Turnaround: routine
 Date: 7-9-87 Case No. 47 to Naval Facilities Engineering Command, Norfolk, Virginia
 JTC Data Report No. 87-259 Table 1

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

N.O. = not observed

* sample depleted unable to do analysis



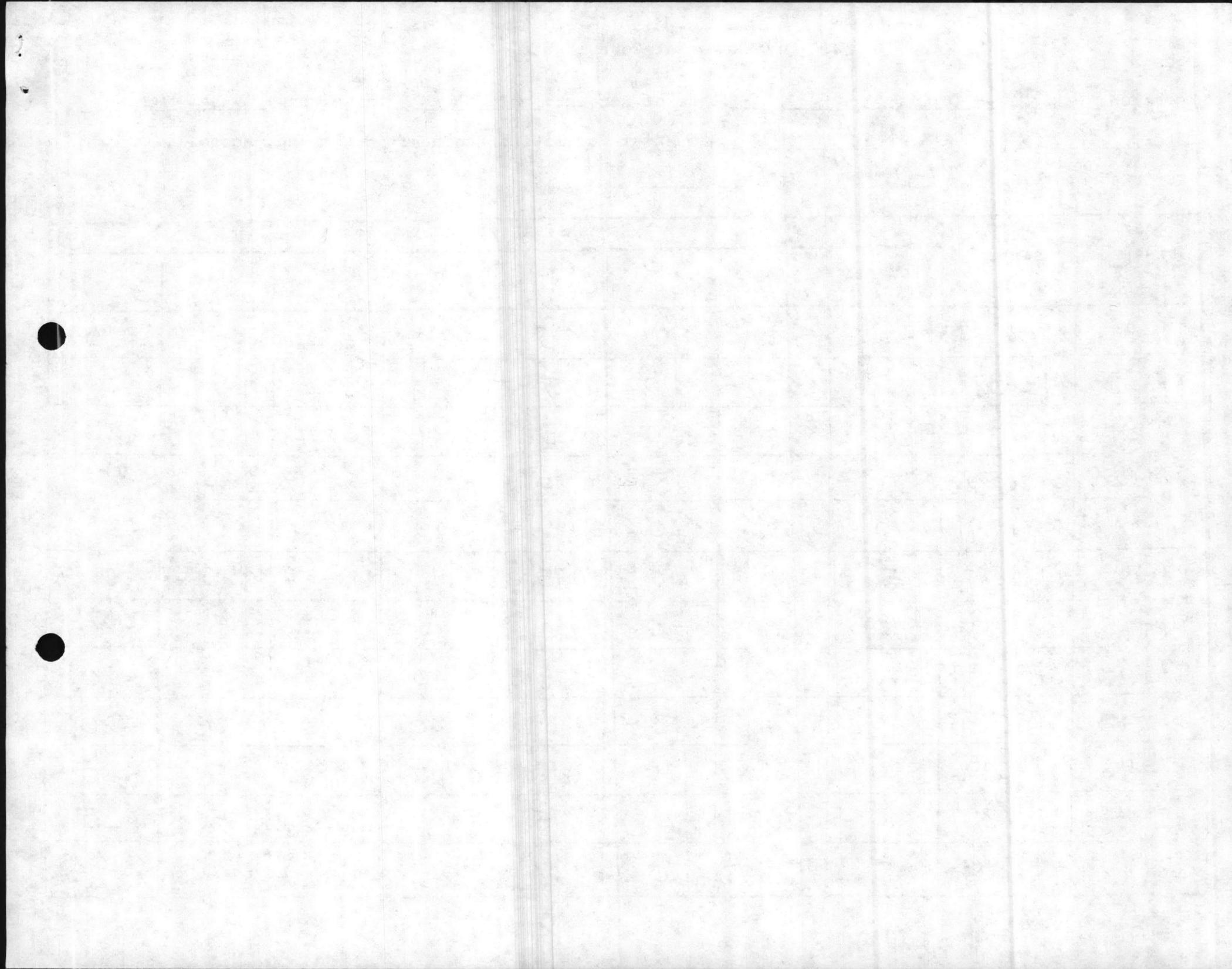
JTC Environmental Consultants, Inc.

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

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

JTC Data Report No. 87-259 Table 2

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



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

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

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

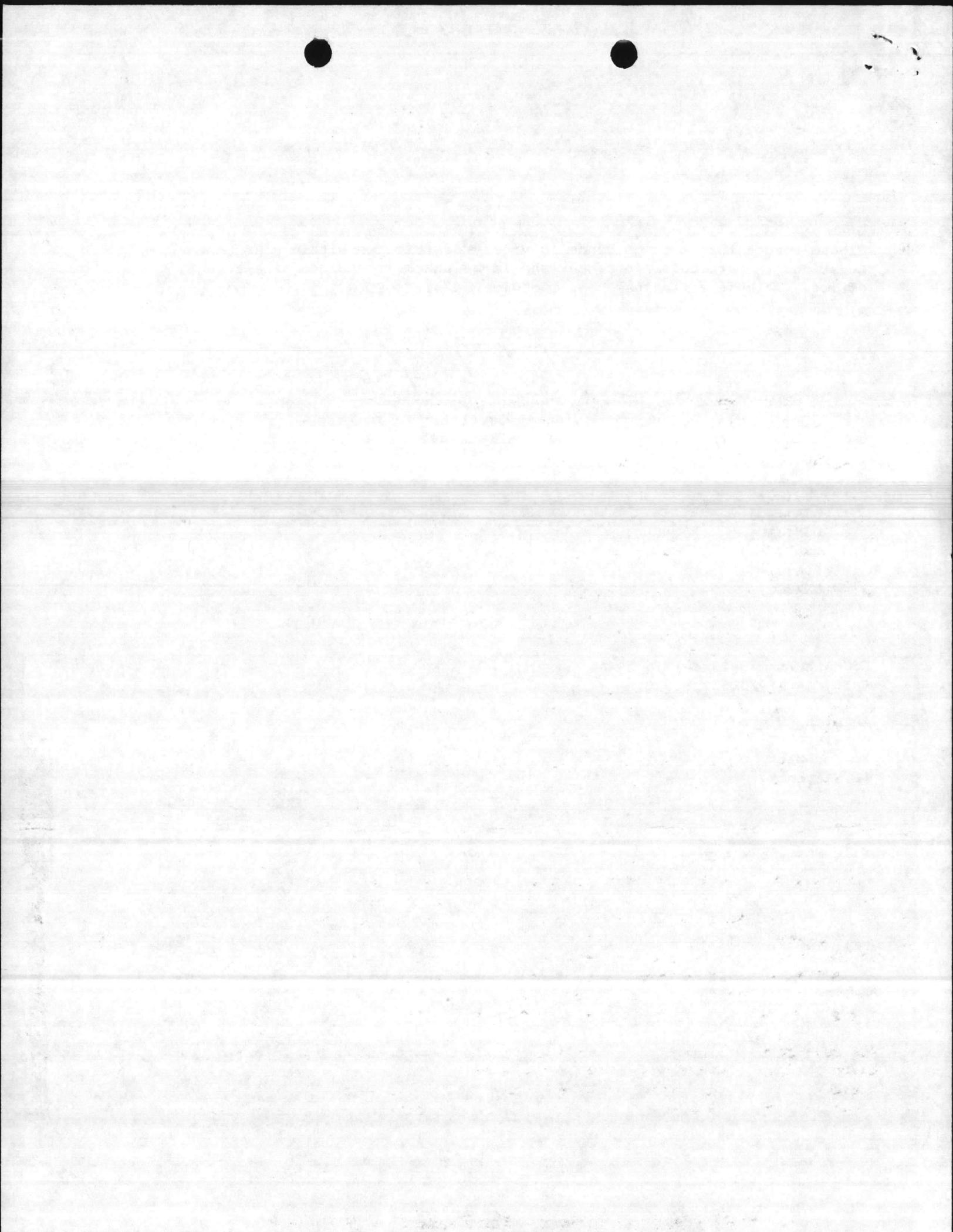
CSCHAFFER/thc/3-23/4-17/5-29-64
CASD (M&L) EP/3D833/57820

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I File
EP Comeback
EP Stayback

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File No. EQ-1.2

GOVERNMENT EXPENSE



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OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, DC 20301

JUN 1984

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

SUBJECT: State Environmental Taxes

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

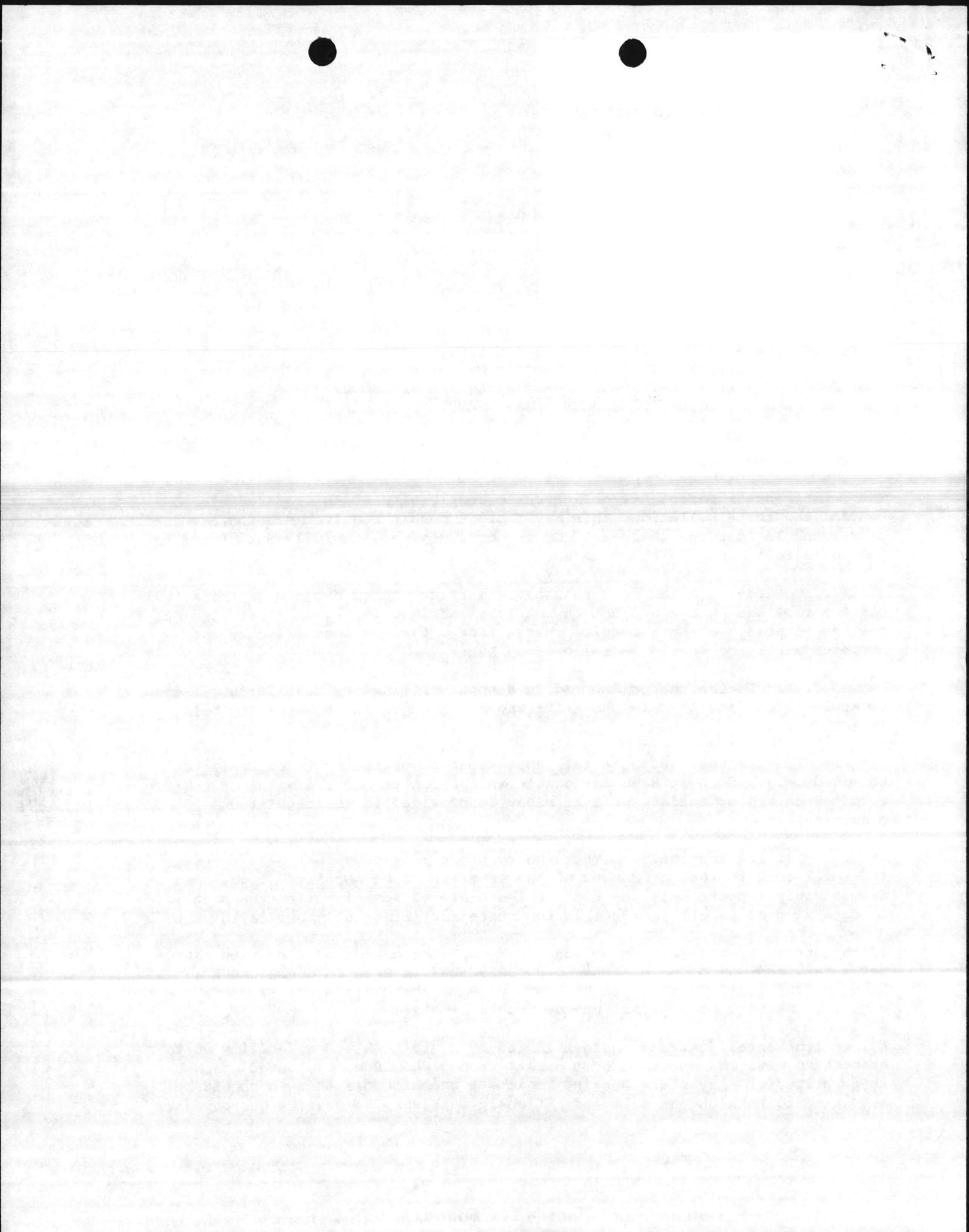
Whether a charge is a tax or a reasonable service charge depends on the actual character of the charge and not on the label affixed to it. A three element test for distinguishing a service charge from a tax was identified by the Supreme Court, and should be followed by DoD:

1. Is the charge imposed in a nondiscriminatory fashion; e.g., does it apply to all entities in the state who are engaged in the activity being taxed?
2. Is the charge "a fair approximation of the costs of benefits" received; e.g., does it seem reasonable in the context of the value of the permit received or assistance that might be provided to the regulated community?
3. Is the charge structured to produce revenue that will not exceed the total cost to the government of the benefits to be supplied; e.g., does it demonstrably support only the cost to the state of administering the program, or does it produce net revenues to the state for potentially unrelated uses?

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

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

AT GOVERNMENT EXPENSE



Read



OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, DC 20301

4 JUN 1984

MANPOWER
INSTALLATIONS
AND LOGISTICS

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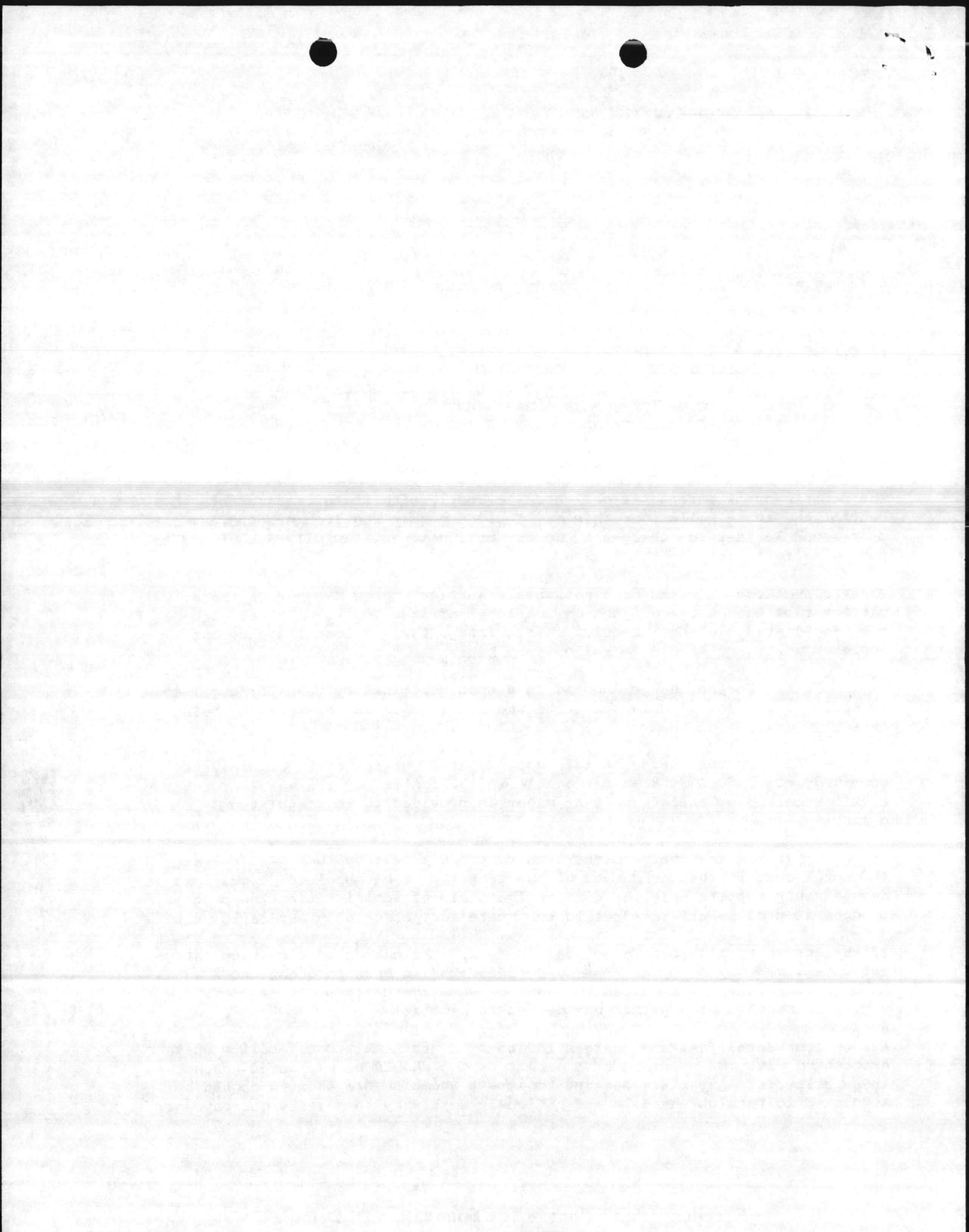
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AT GOVERNMENT EXPENSE



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ANT SECRETARY OF DEFENSE
GTON, DC 20301

JUN 1984



OF THE ARMY, (I&L)
DEPUTY ASSISTANT SECRETARY OF THE NAVY (I&P)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE (IE&S)
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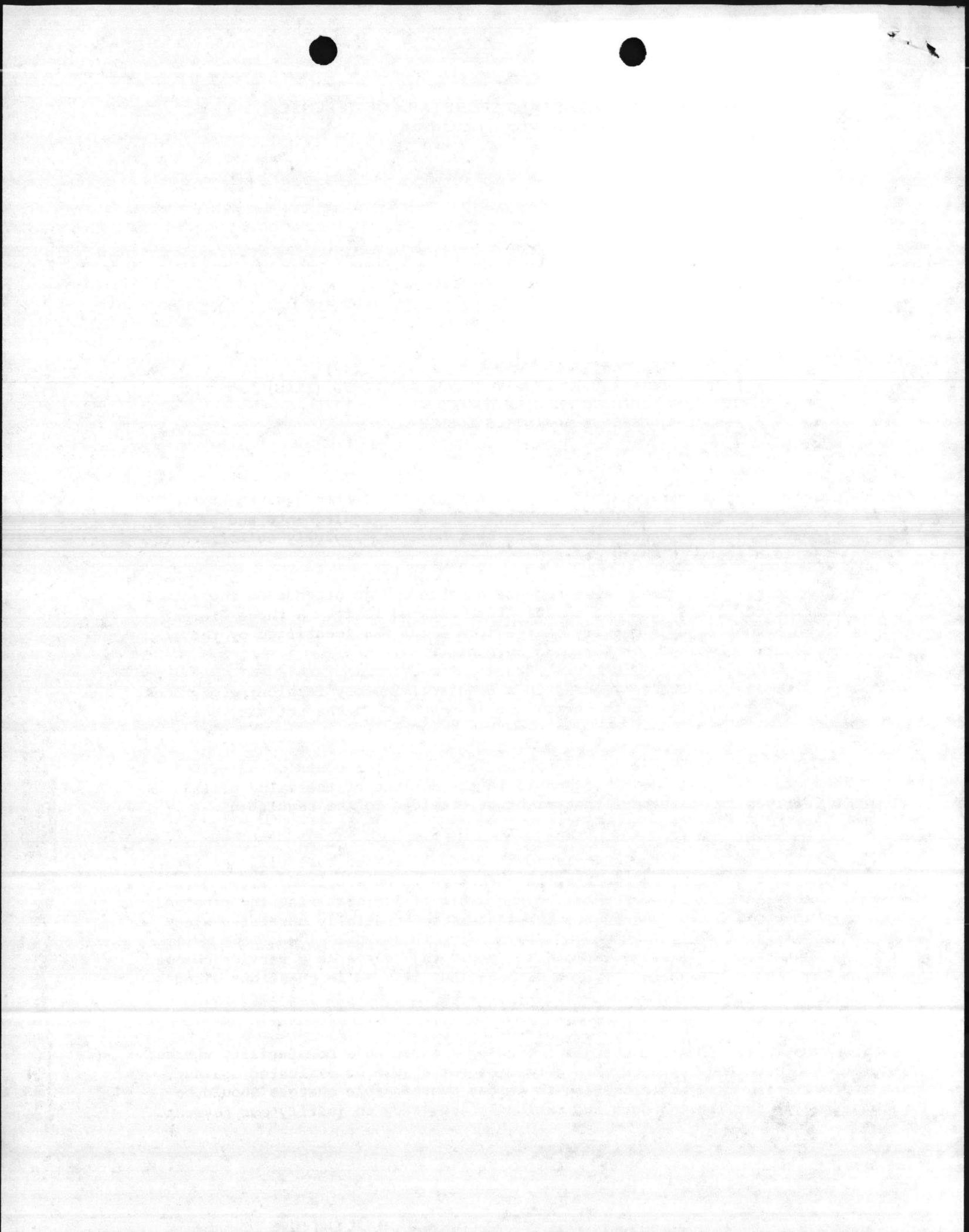
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GOVERNMENT EXPENSE



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OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, DC 20301

4 JUN 1984

MANPOWER
INSTALLATIONS
AND LOGISTICS

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY, (I&L)
DEPUTY ASSISTANT SECRETARY OF THE NAVY (I&F)
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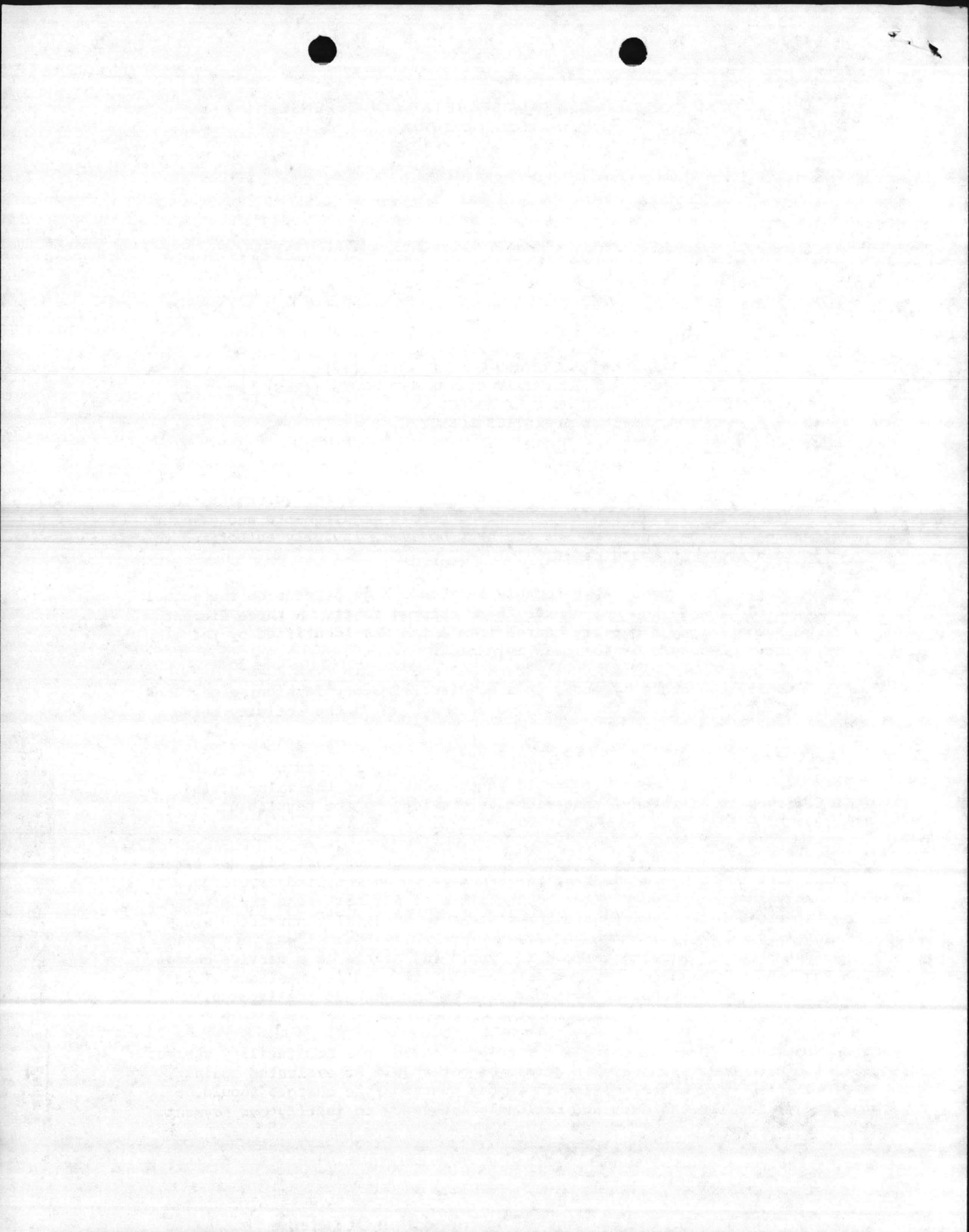
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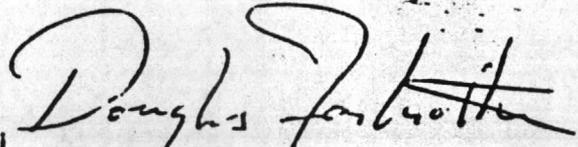
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GOVERNMENT EXPENSE



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

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

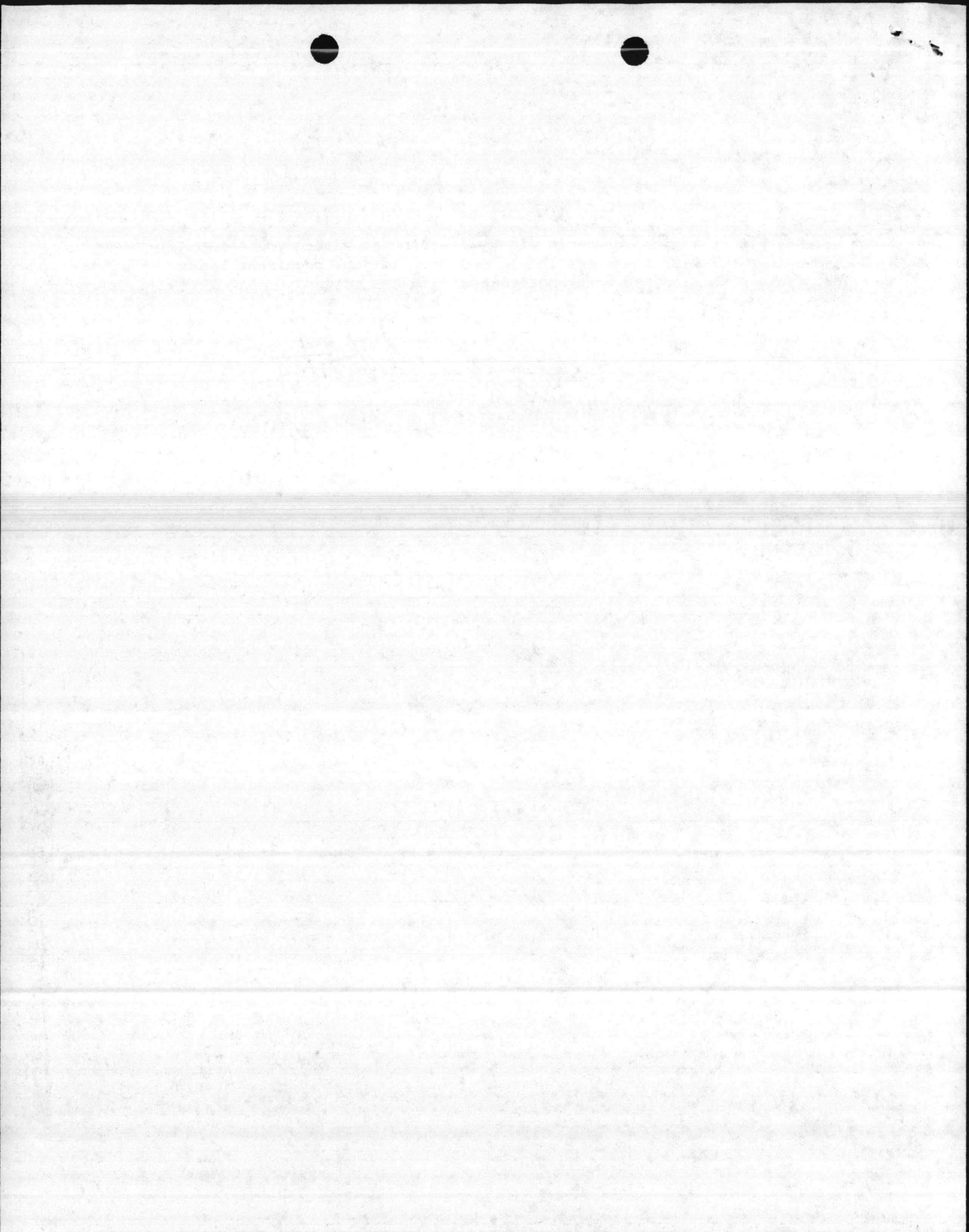
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OASD(MI&L)EP/3D633/57820

- I Chron
- I File
- EP Comeback
- EP Stayback

67457

File NO. EQ-1.2

GOVERNMENT EXPENSE



Revd



OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, DC 20301

4 JUN 1984

MANPOWER
INSTALLATIONS
AND LOGISTICS

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY, (I&L)
DEPUTY ASSISTANT SECRETARY OF THE NAVY (I&F)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE (IE&S)
DIRECTOR, DEFENSE NUCLEAR AGENCY
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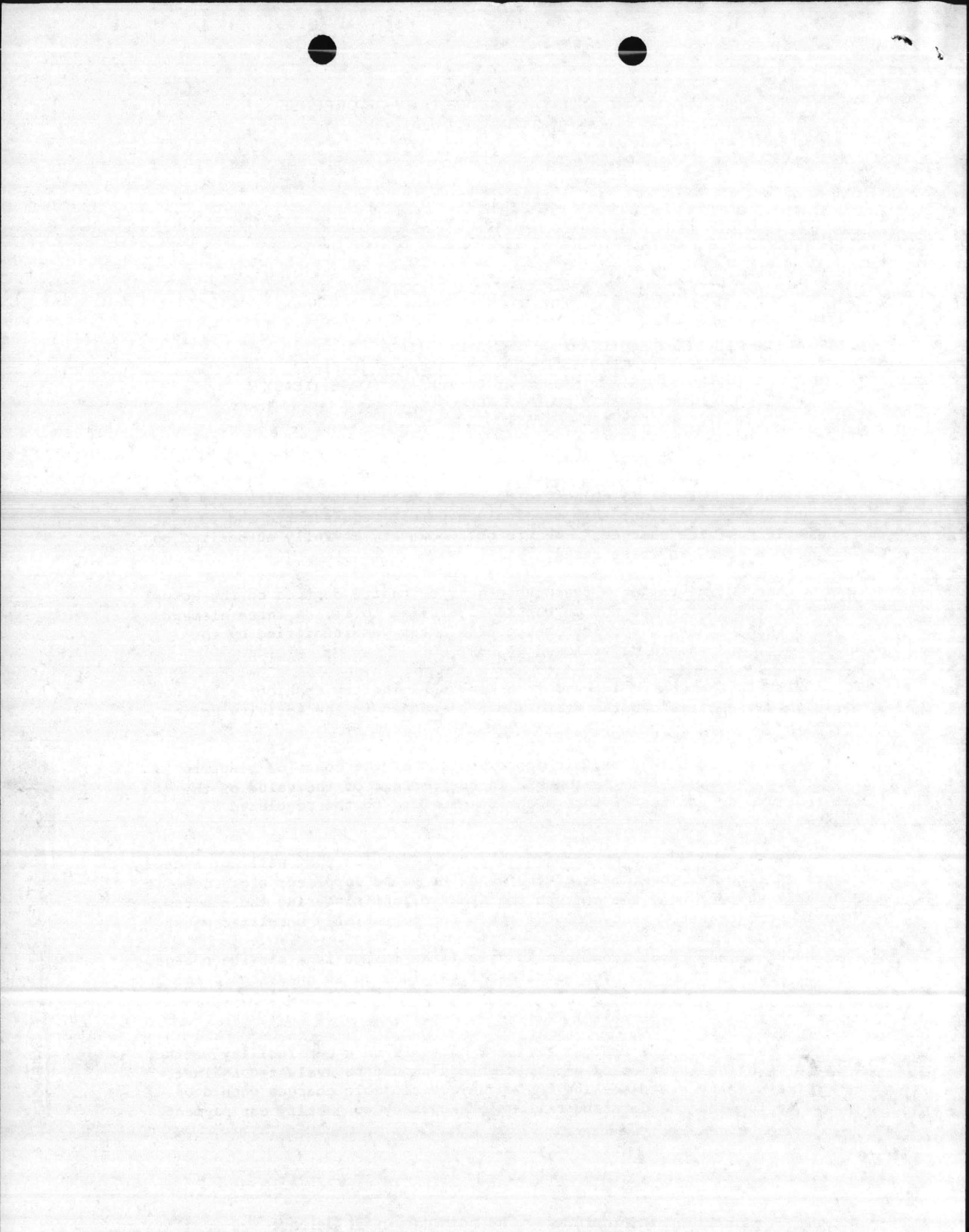
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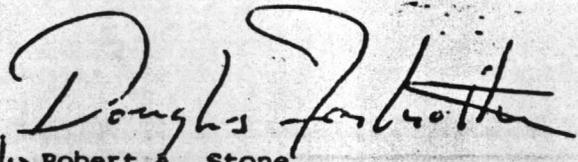
If the answer to all three questions is "yes," the charge is a service charge, not a tax, and may be paid. The word "benefits" is used in questions 2 and 3 to mean "the benefits received by those on whom the charges are imposed," e.g., the receipt of a permit may be such a benefit.

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

GOVERNMENT EXPENSE



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



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

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

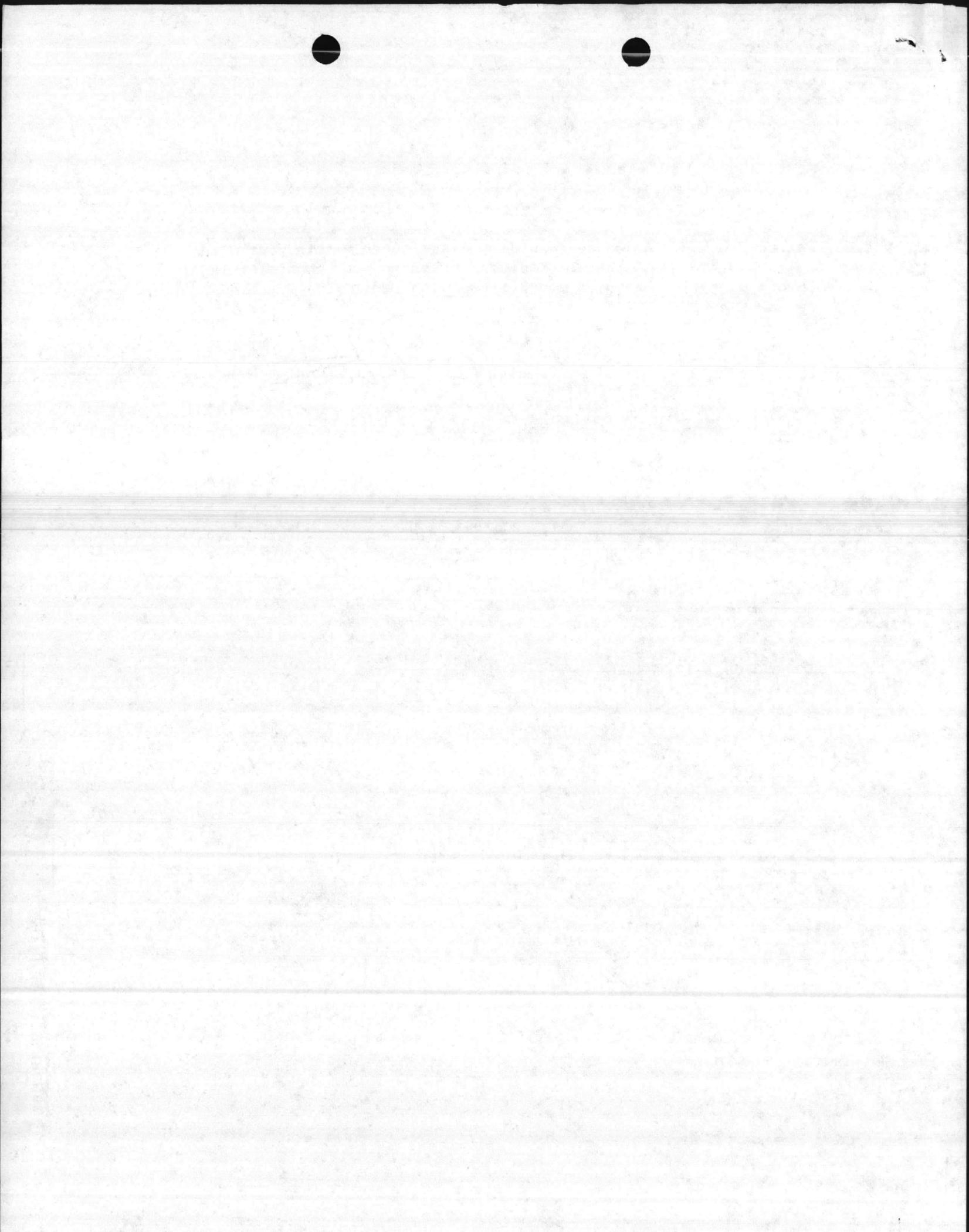
CSCHAFFER/thc/3-23/4-17/5-29-64
CASD(MI&L)EP/3D833/57820

- 1 Chron
- 1 File
- EP Comeback
- EP Stayback

47457

File NO. EQ-1.2

GOVERNMENT EXPENSE



M 93182 7162-0001

EGGERS 272,000 (7166)

6240
MAIN

From: Hazardous Material Disposal Officer
To: Director, Defense Reutilization and Marketing Office, Camp
Lejeune
Subj: DISPOSAL OF HAZARDOUS WASTE FUEL
Ref: (a) BO 6240.5
Encl: (1) DISPOSAL DOCUMENT DD 1348-1
(2) JTC ENVIROMENTAL CONSULTANTS, INC. REPORT #559

1. In compliance with the reference, enclosures (1) and (2) are submitted.
2. Currently, all storage tanks maintained by this organization for collection and storage of hazardous and/or contaminated fuel and lubricants are filled to capacity. Therefore, the requirement to empty the storage tank as listed on enclosure (3) is URGENT.
3. The storage capacity of the storage tank is 272,000 gallons. It is requested that the contents, down to the sludge level, be properly disposed of.

DAVID K. BULLOCK

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

NREAD

6240
NREAD
AUG 14 1987

gls
ENVIRONMENTAL
CONSERVATION
✓

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

Subj: RCRA WASTE MINIMIZATION CERTIFICATION

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

Encl: (1) MCO 6280.8

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

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

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

T. J. DALZELL
By direction

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

WREAD

AUG 1 1 1987

10/15/87

Word Processor Number 8 of disk
Date Typed 10/15/87
Written by G. Smith/T. Harrison

6240
NREAD
21 Jul 87

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

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

Ref: (a) NEESA MSG 0516207 June 1987

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

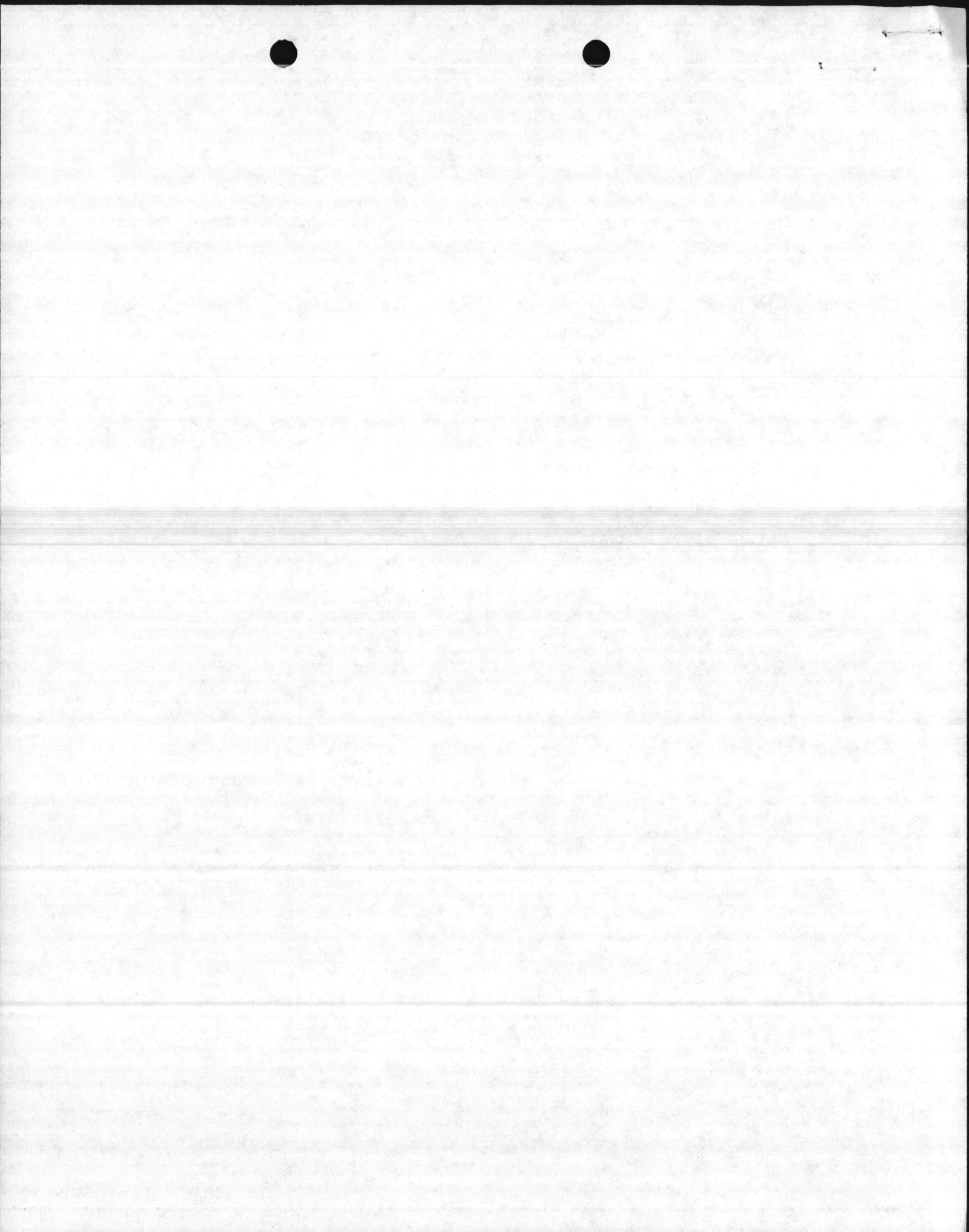
1. This memo is in response to your recent request for an update on the subject training to be held at Camp Lejeune as provided by the reference. Enclosure (1) lists personnel from local activities attending. We were fortunate to be able to get this many slots. Approximately eight individuals will be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

J. I. WOOTEN

Del
Bic. Tech
Das
Supp. Eval.

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

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



ROUTINE REPLY, ENDORSEMENT, TRANSMITTAL OR INFORMATION SHEET

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

A WINDOW ENVELOPE MAY BE USED
Formerly NAVEXOS 3789

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

FROM (Show telephone number in addition to address)

SUBJECT

DATE

SERIAL OR FILE NO.

TO:

Sammy Gwynn
MCB
NREA office
Camp Lejeune NC 28542

REFERENCE

ENCLOSURE

VIA:

ENDORSEMENT ON

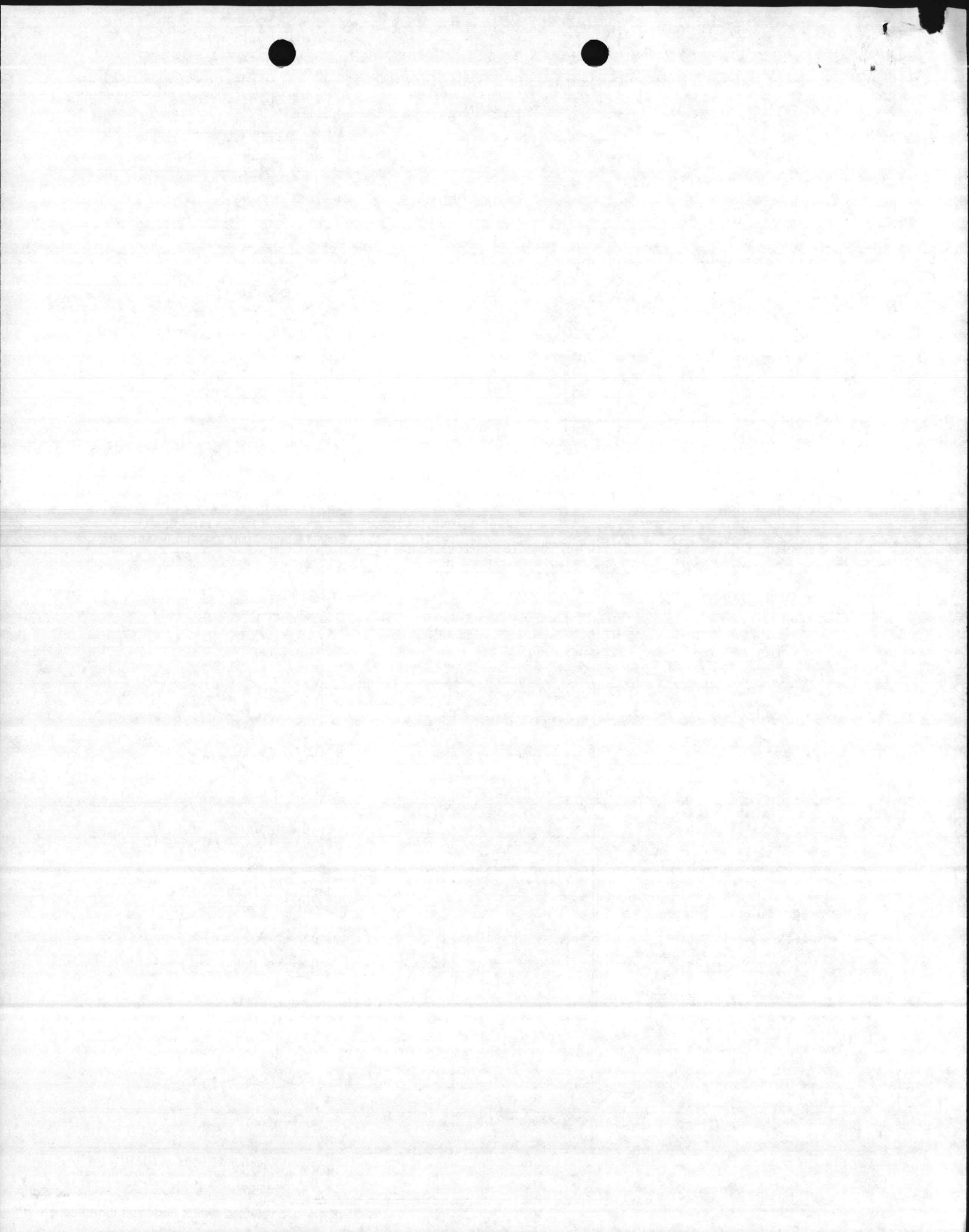
FORWARDED RETURNED FOLLOW-UP, OR TRACER REQUEST SUBMIT CERTIFY MAIL FILE

GENERAL ADMINISTRATION	CONTRACT ADMINISTRATION	PERSONNEL
FOR APPROPRIATE ACTION UNDER YOUR COGNIZANCE INFORMATION	NAME & LOCATION OF SUPPLIER OF SUBJECT ITEMS	REPORTED TO THIS COMMAND:
APPROVAL RECOMMENDED <input type="checkbox"/> YES <input type="checkbox"/> NO	SUBCONTRACT NO. OF SUBJECT ITEM	
<input type="checkbox"/> APPROVED <input type="checkbox"/> DISAPPROVED	APPROPRIATION SYMBOL, SUBHEAD, AND CHARGEABLE ACTIVITY	DETACHED FROM THIS COMMAND
COMMENT AND/OR CONCURRENCE CONCUR	SHIPPING AT GOVERNMENT EXPENSE <input type="checkbox"/> YES <input type="checkbox"/> NO	OTHER
LOANED, RETURN BY:	A CERTIFICATE, VICE BILL OF LADING	
SIGN RECEIPT & RETURN REPLY TO THE ABOVE BY:	COPIES OF CHANGE ORDERS, AMENDMENT OR MODIFICATION	
	CHANGE NOTICE TO SUPPLIER	
	STATUS OF MATERIAL ON PURCHASE DOCUMENT	
REFERENCE NOT RECEIVED	REMARKS (Continue on reverse)	
SUBJECT DOCUMENT FORWARDED TO:	These are the support requirements for training course -	
SUBJECT DOCUMENT RETURNED FOR:	I will help you with any that are difficult -	
SUBJECT DOCUMENT HAS BEEN REQUESTED, AND WILL BE FORWARDED WHEN RECEIVED	Good Luck	
COPY OF THIS CORRESPONDENCE WITH YOUR REPLY	Chris	
ENCLOSURE NOT RECEIVED		
ENCLOSURE FORWARDED AS REQUESTED		
ENCLOSURE RETURNED FOR CORRECTION AS INDICATED		
CORRECTED ENCLOSURE AS REQUESTED		
REMOVE FROM DISTRIBUTION LIST		
REDUCE DISTRIBUTION AMOUNT TO:	SIGNATURE & TITLE	

COPY TO:

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

ENCLOSURE 

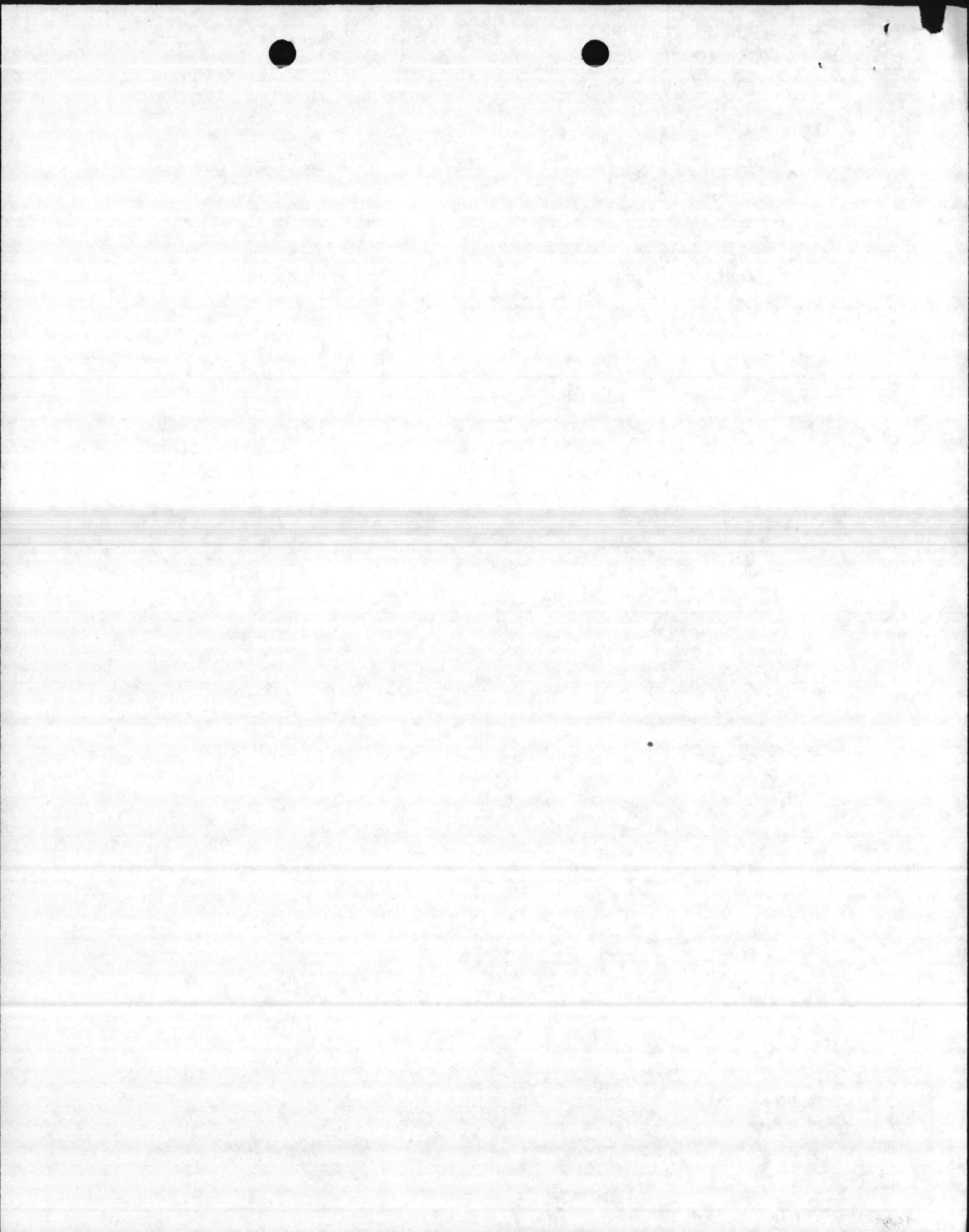




Christine Connelly
Environmental Engineer

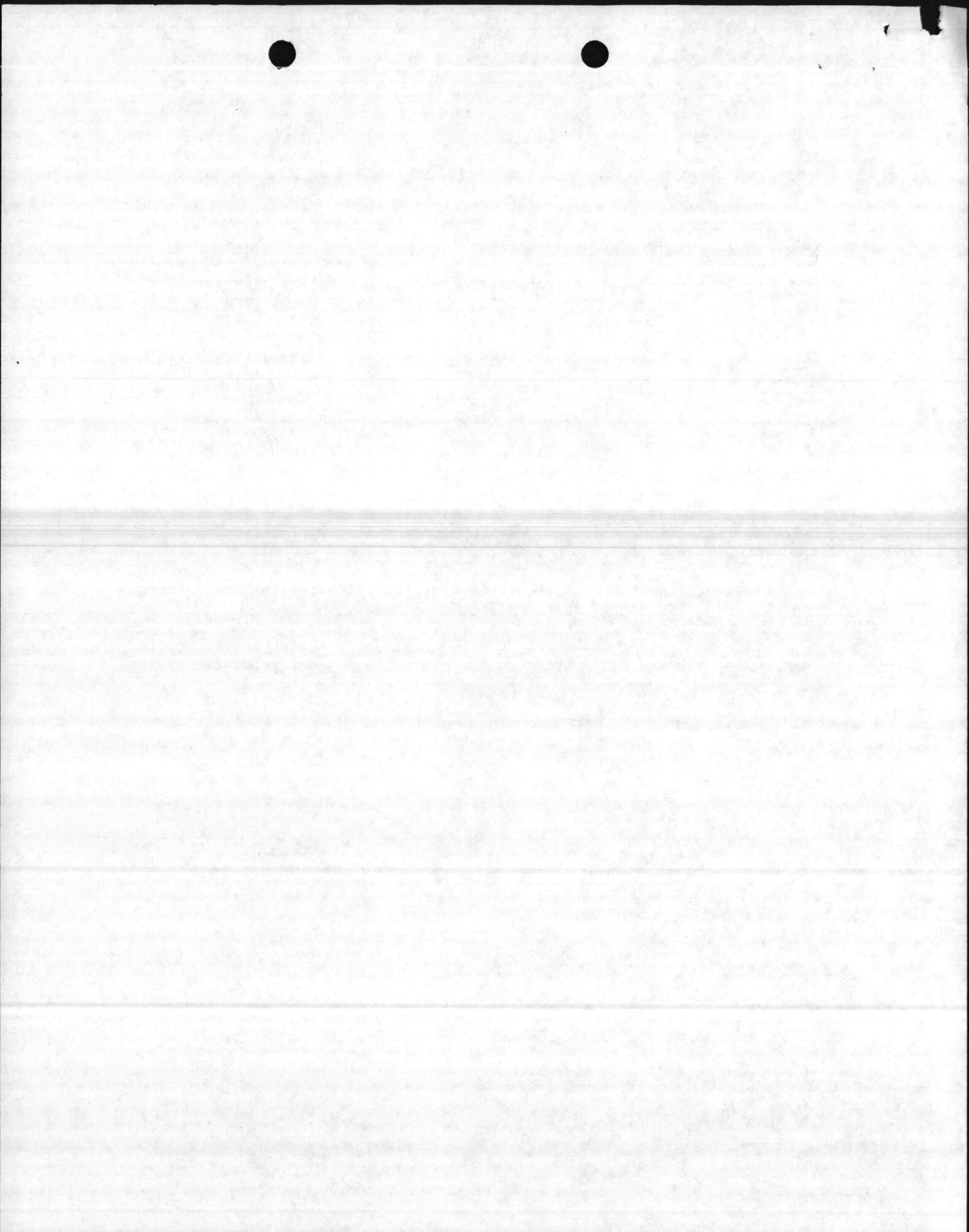
NAVAL ENERGY AND ENVIRONMENTAL
SUPPORT ACTIVITY, CODE 112H
Port Hueneme, CA 93043

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



Special requirements for IRMC:

1. 16 empty, closed-top, 55 gallon drums (with bungs).
2. 4 five-gallon pails. ✓
3. One-hand truck. ✓
4. 26 cardboard boxes (approximate volume, 1.5 cu. ft. each). ✓ 5024 GYSET SHAW
5. Two fire extinguishers available. ✓
6. Bus to transport students to and from exercise area (if necessary). ✓
7. Flat bed truck for transportation spill exercise. ✓
- * 8. Enclosed area for a warehouse exercise with door to outside (located near classroom).
- * 9. Field area for a spill exercise (located near classroom).
- * 10. 600-1000 square foot area adjacent to classroom to be used for a suiting-up exercise. ✓
- * 11. Secure storage area (indoors) located near classroom and exercise areas for protective equipment (SCBAs, environmental suits, air monitoring instruments, etc.). ✓
12. Medical personnel should be notified of the potential for heat stress incidents and the need for salt replacement liquids.
13. Provide one person and forklift with operator to assist contractor in unloading heavy boxes and setting up for course on day before course starts.
and for loading @ end of course



Support Requirements*

For all Courses:

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

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

3. Coordinate screening of nominations with NEESA.

* 4. Reserve a classroom for specified class size.

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

o Slide projector and screen

o 16mm movie projector

o Overhead projector $\frac{1}{4}$ VERTIC

o $\frac{3}{4}$ " VHS video machine and television monitor (video recorder required for HSIRMCs) HAZARDOUS SUBSTANCE INCIDENT RESPONSE MANAGEMENT COURSE

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

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

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

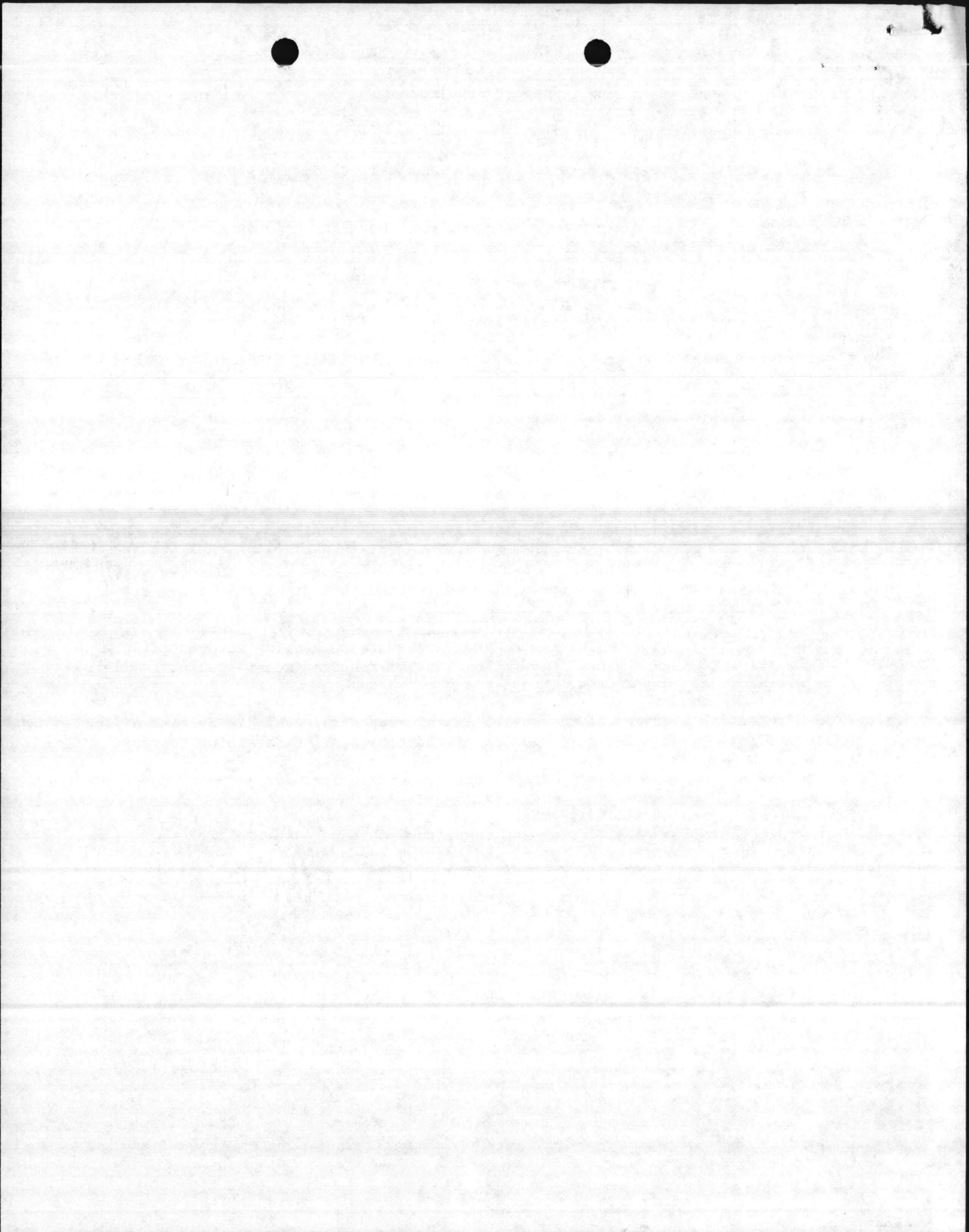
Minimal! → 9. Provide for secretarial and logistic support to include:

o Stamping of military orders

o Resolution of billeting and security problems ✓

o Small quantities of typing and copying support ✓

Enclosure (2)



ASSISTANT CHIEF OF STAFF
HEADQUARTERS, MARINE CORPS BASE

20 July 87

PLEASE give me a little
info for Col Dabzell on this.

SAMI-

lets

Discuss
Shaife

Jubcin

ATTN: _____

1. Attached is forwarded for info/action.
2. Please initial, or comment, and return all papers to this office.

What is status of our
participation in subject course?

3. Your file copy.

T.J. Dabzell

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

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 17 July 1985

TO:

DIR, FAMILY HOUSING

BASE MAINT O

DIR, UNACCOMPANIED PERS HSG

PUBLIC WORKS O

BASE FIRE CHIEF

COMM-ELECT O

DIR, NAT. RESOURCES & ENV. AFFAIRS

participation in budget work?
staff is vital to our

W. D. [Signature]

LET'S THINK OF A FEW REASONS
THE WAY IT CAN BE DONE

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 17 July 1987

TO:

BASE MAINT O

DIR, FAMILY HOUSING

PUBLIC WORKS O

DIR, UNACCOMPANIED PERS HSG

COMM-ELECT O

BASE FIRE CHIEF

DIR., NAT. RESOURCES & ENV. AFFAIRS

ATTN: _____

1. Attached is forwarded for info/action.

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

*What is status of our
participation in subject course?*

3. Your file copy.

T. J. Dalzell

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



[Redacted area]

participation in legal work?

W. J. [Signature]

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

UNCLASSIFIED
U U H
UNCLASSIFIED

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

Sue

ADMINISTRATIVE MESSAGE

ROUTINE

R 051620Z JUN 87 ZYR

FM NEESA PORT HUENEME CA

TO CG MCPEC QUANTICO VA
CG MCB CAMP PENDLETON CA
COMCABWEST EL TORO CA
COMCABEAST CHERRY PT NC
MCAS TUSTIN CA
MCAS NEW RIVER TC
CG MCB CAMP BUTLER JA
CG MCLR BARSTOW CA
CG MCAGCC TWENTYNINE PALMS CA
MCAS IWAKUNI JA
MCAS BEAUFORT SC

CG MCRD ERR PARRIS ISLAND SC
CG MCRD WRR SAN DIEGO CA
CG MCAS EL TORO CA
CG MCAS CHERRY PT NC
MCAS YUMA AZ
CAMP H M SMITH HI

INFO CMC WASHINGTON DC//LFI

UNCLAS //N12400//

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

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

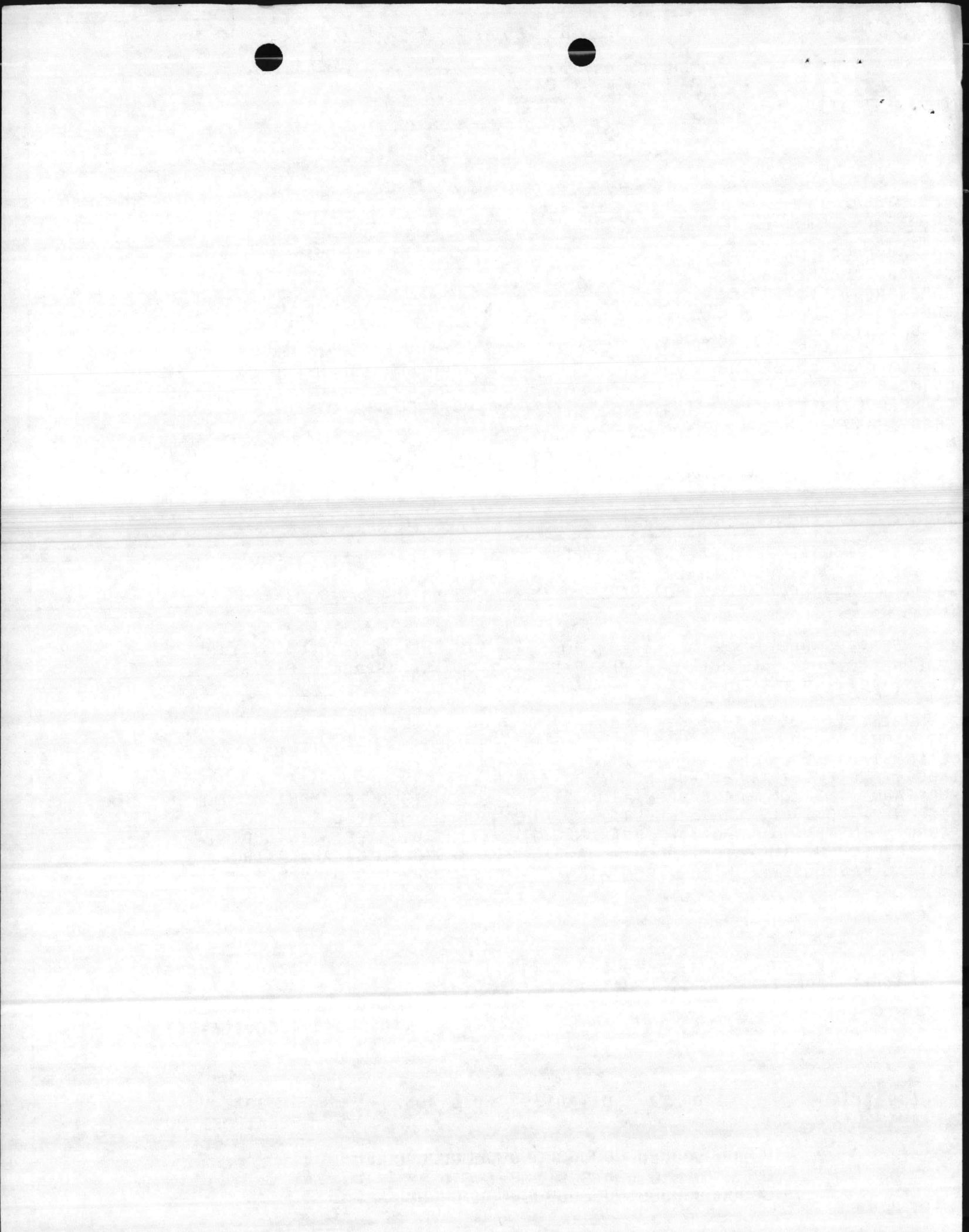
2. NOMINATION DEADLINE: 2 JUL 87
TUTION: NONE
CLASS SIZE: 24
TARGET AUDIENCE: ON-SCENE COMMANDERS AND LEADERS OF A HAZARDOUS SUBSTANCE (HS) ON-SCENE OPERATIONS TEAM RESPONSIBLE FOR MGMT OF THE RESPONSE, CONTROL, CONTAINMENT, AND CLEAN UP OF HS SPILLS.
SCOPE: INSTRUCTION ON SAFE RESPONSE TO HS EMERGENCIES.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

MANP(2)...ACT FOR CG MCB CAMP LEJEUNE(11)
BCDS(1) BCPO(1) BSUN(1) CEOA(1) ECCO(4) DICB(1) 12400/ 1/0361

RTD:000-000/COPIES:0011

055991/160 1 OF 2 MATA0139 160/04:05Z 051620Z JUN 87
CSN:AUIB00114 NEESA PORT HUE

UNCLASSIFIED





.....

.....

6241/2
NREAD
14 Jul 87

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

Subj: WASTE OIL STORAGE TANKS; ANALYSIS OF

Ref: (a) BO 6240.5

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

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

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

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

J. I. WOOTEN

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

THE UNIVERSITY OF CHICAGO
DEPARTMENT OF CHEMISTRY
58 CHEMISTRY BUILDING
CHICAGO, ILLINOIS 60637

TO: THE DIRECTOR, NATIONAL BUREAU OF STANDARDS
432 RIVERSIDE DRIVE
GAITHERSBURG, MARYLAND 20885

FROM: DR. J. H. GOLDSTEIN
UNIVERSITY OF CHICAGO

RE: ¹³⁷Cs AND ¹³⁴Cs
CALIBRATION OF THE
GAMMA RAY SPECTROMETER

Enclosed for your information are two copies of a report
describing the calibration of the gamma ray spectrometer
at the University of Chicago. The report contains
a list of the sources used and the results of the
calibration. The report is being submitted to you
for your information and for your records.

Very truly yours,
J. H. Goldstein

Enclosure



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

IN REPLY REFER TO:
6240

G-4 ENGR

17 JUL 1987

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

Subj: RESULTS OF HAZARDOUS WASTE MANAGEMENT COMPLIANCE INSPECTIONS

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

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

1. The subject inspection was conducted by Base Environmental personnel in accordance with the references. The enclosure identifies cited discrepancies and provides recommendations for corrective actions.
2. Request a list of all corrective actions taken to date be provided this Headquarters by 17 Aug 1987. The date for re-inspection by Base Environmental personnel will be coordinated through the Division Engineer Office.
3. Point of contact at this Headquarters is Captain J. M. REUTER, Division Engineer Officer, at extensions 2755/5111.

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

Copy to:
→ NREAD, MCB, CLNC





*Twyble please note & remind me on 2 find
JdW*

*Davis & Blenc
have a copy*

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

IN REPLY REFER TO:
12410
FAC
MAY 08 1987

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

Dear Ms. Long:

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

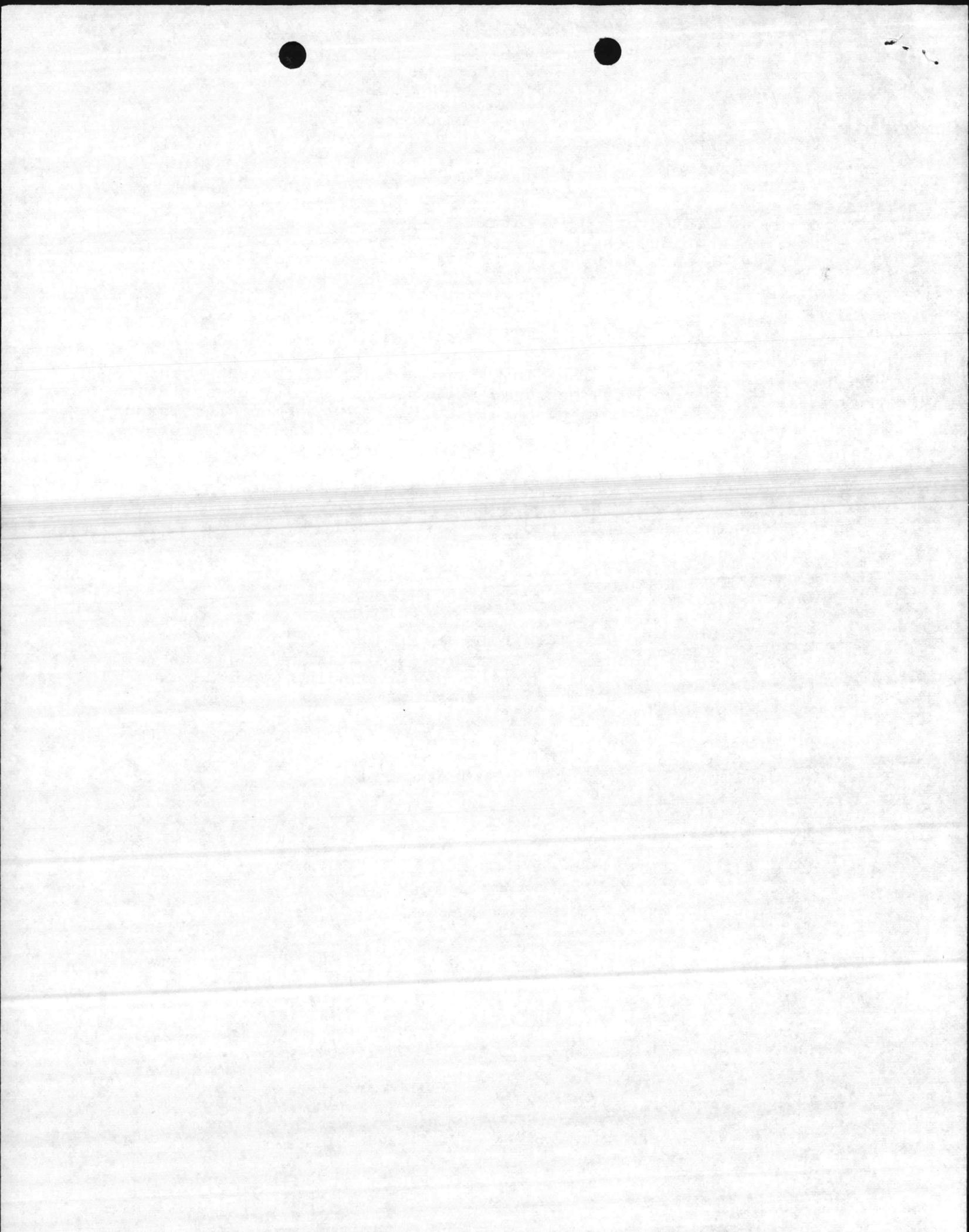
The enclosure provides names and titles of personnel we would like to attend and the date desired. Our personnel are amenable to rescheduling if required.

Sincerely,

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

Encl:
(1) List of Attendees

Blind copy to:
MAIN
→ NREAD
FIRE



MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA

LIST OF ATTENDEES

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



File

PROPOSED AGENDA

for

PLANNING SESSION, HM/HW MANAGEMENT PROGRAM BRIEFING

to

GOVERNORS ADVISORY COMMISSION ON MILITARY AFFAIRS

22 July 1987

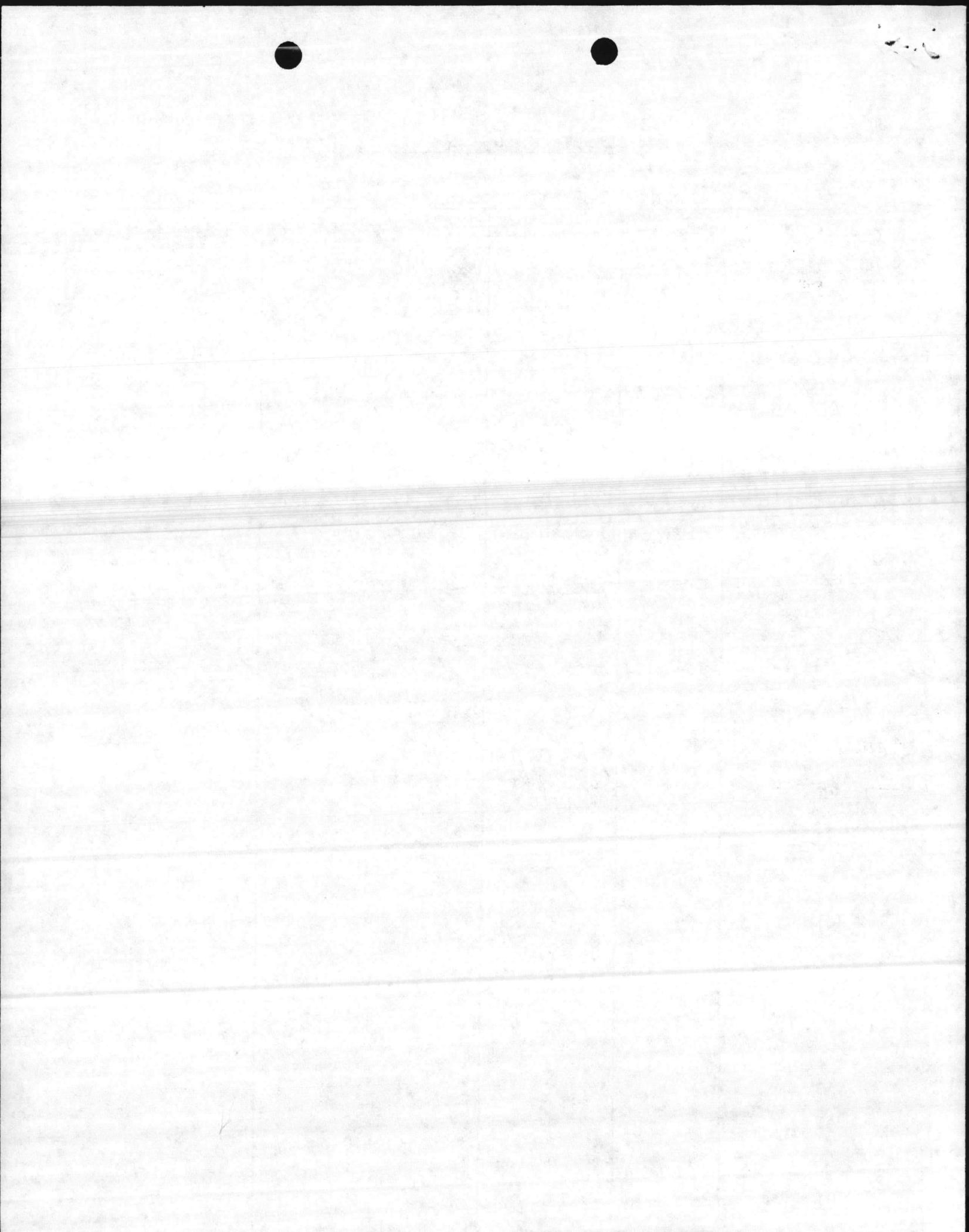
MARINE CORPS BASE, CAMP LEJEUNE, NORTH CAROLINA

- Introduction of Attendees
- Purpose of Planning Session
 - Feasibility
 - Content
 - Format
- Overview of HM/HW Management Program at Marine Corps Base, Camp Lejeune
- Overview, comments from other Commands
- Discussion
- Recommendations



PLANNING SESSION ATTENDEES

NAME	RANK	COMMAND	BILLET/POSITION	TELEPHONE #
DALZELL, T. J.	COLONEL	CAMP LEJEUNE	AC/S FACILITIES	(AV) 484-3039/3035
NELSON, R. D.	GM-13	CHERRY POINT	NREAD	(AV) 582-3631/4186
Dougherty, Chris	CAPT	CAMP Lejeune	Office of Staff Judge Advocate	(AV) 484-5177/5383
Mackmull, Stephen J.	GS-11	Fort Bragg	Environmental office	AV 236-8207/3372
Talley, Debra J.	CPT	Fort Bragg	Ft Bragg JAG	AV 236-4913/4193
Byrd, Bob	GS-11	Fort Bragg	Environmental Office	AV 236-3372/8207
Harris, Kenneth L.	GS-12	Fort Bragg	Natural Resources Div.	Av. 236-6518
WRIGHT, JOSEPH A.	GS-11	U.S. COAST GUARD SUPPORT CENTER	STAFF ENGINEER HAZ MAT MANAGEMENT	(FTS- 931 0569 919-335-6569
WOOTEN JULIAN	GS-12	NREAD CAMP LEJEUNE	Dir Nat Res	AV 484-5003
SOMERS, BRUCE	GM-13	POPE AFB	DEPUTY BCE	919 451-5003/1680
LOPEL, ROBERT	GS-11	POPE AFB	ENVIRONMENTAL PLANNING SEC.	919-394-2563 919-394-4193
Not in attendance Donny Jones		Seymour Johnson AFB		



~~SEA~~
NREA

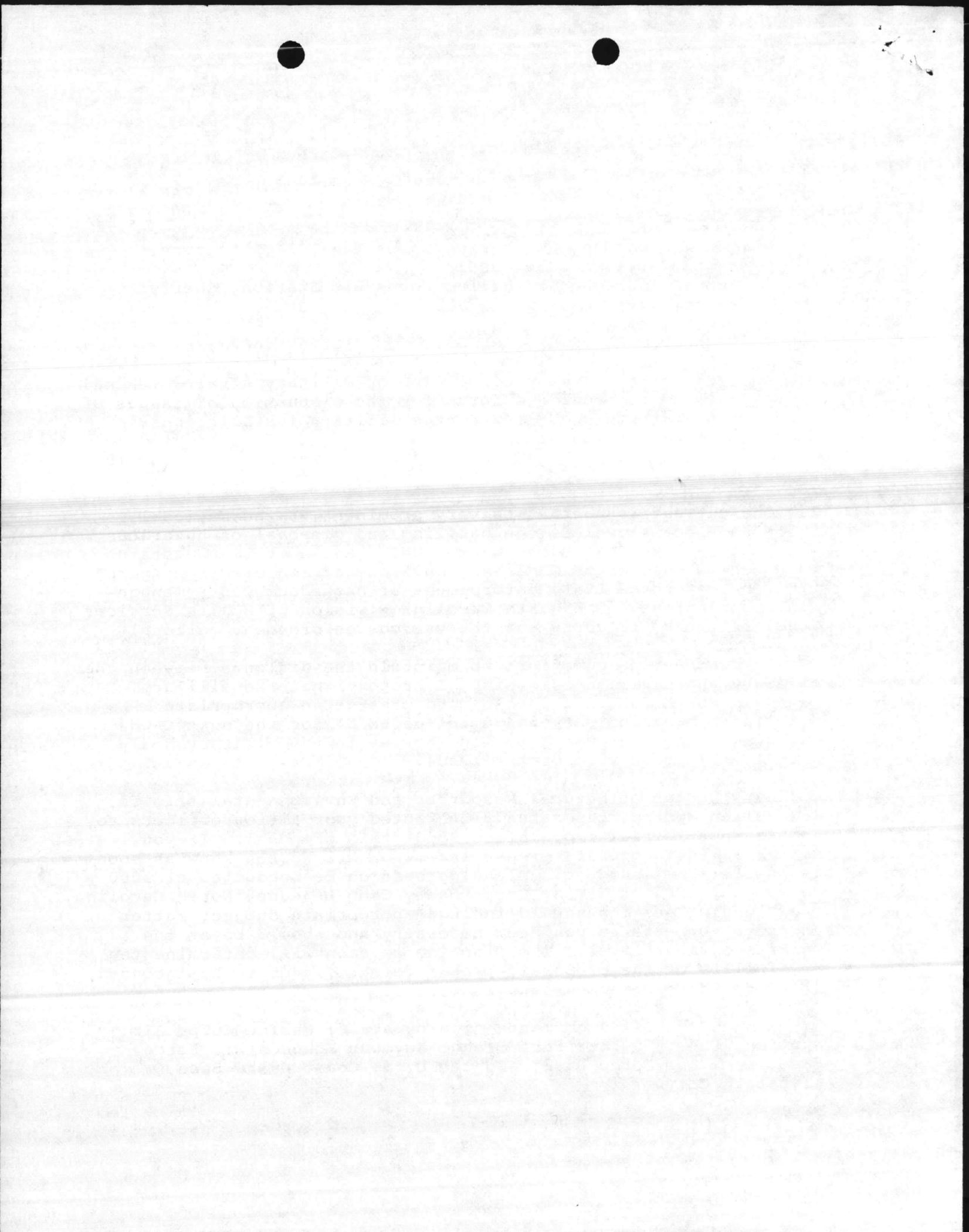
T51120

5420
FAC
JUL 14 1987

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

Subj: GOVERNORS ADVISORY COMMISSION ON MILITARY AFFAIRS

1. The Governors Advisory Commission on Military Affairs (GACMA) is established to provide a forum for the discussion of issues of mutual concern between United States military installations in North Carolina and the State. The next meeting is scheduled to occur at Marine Corps Base, Camp Lejeune, North Carolina, on 19 August 1987.
2. One current issue that is very prominent at the National, State and local level is the handling and disposal of hazardous material (HM) and hazardous waste (HW). Pursuant to the statutory scheme enacted by Congress, Environmental Protection Agency (EPA) has approved State enforcement of hazardous waste management regulations. The North Carolina Division of Health Services (DHS) is tasked to carry out the various enforcement actions.
3. In our continuing effort to maintain the dialogue between the military and civilian community, I propose that the military bases in North Carolina develop and present an appropriate briefing concerning our management of HM/HW for the next GACMA meeting. The brief would outline how we in the military deal with this extremely important issue.
4. My Director of Natural Resources and Environmental Affairs, Mr. Julian Wooten, has already contacted your action officers to obtain some initial impressions about this proposal. If you concur in the proposal, please let me or Mr. Wooten know as soon as possible. I suggest a planning session be conducted at 1000 on 22 July 1987 at Marine Corps Base, Camp Lejeune, North Carolina. The planning session should include appropriate subject matter and legal experts as you deem necessary and should be at the working officer level. The planning session will determine the feasibility of the proposal, proper format, items to be included, briefers and other necessary items.
5. I have requested comments from my staff; Marine Corps Air Station, Cherry Point; Fort Bragg; Seymour Johnson Air Force Base; Pope Air Force Base; and the U. S. Coast Guard Base, Elizabeth City.



Subj: GOVERNORS ADVISORY COMMISSION ON MILITARY AFFAIRS

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

- a. AC/S, Facilities: Colonel T. J. Dalzell
AV: 484-3034/5925
- b. Director, Natural Resources and Environmental Affairs
Division: Mr. Julian Wooten
AV: 484-5003/2083
- c. Staff Judge Advocate: Captain C. E. Dougherty
AV: 484-5177/5675

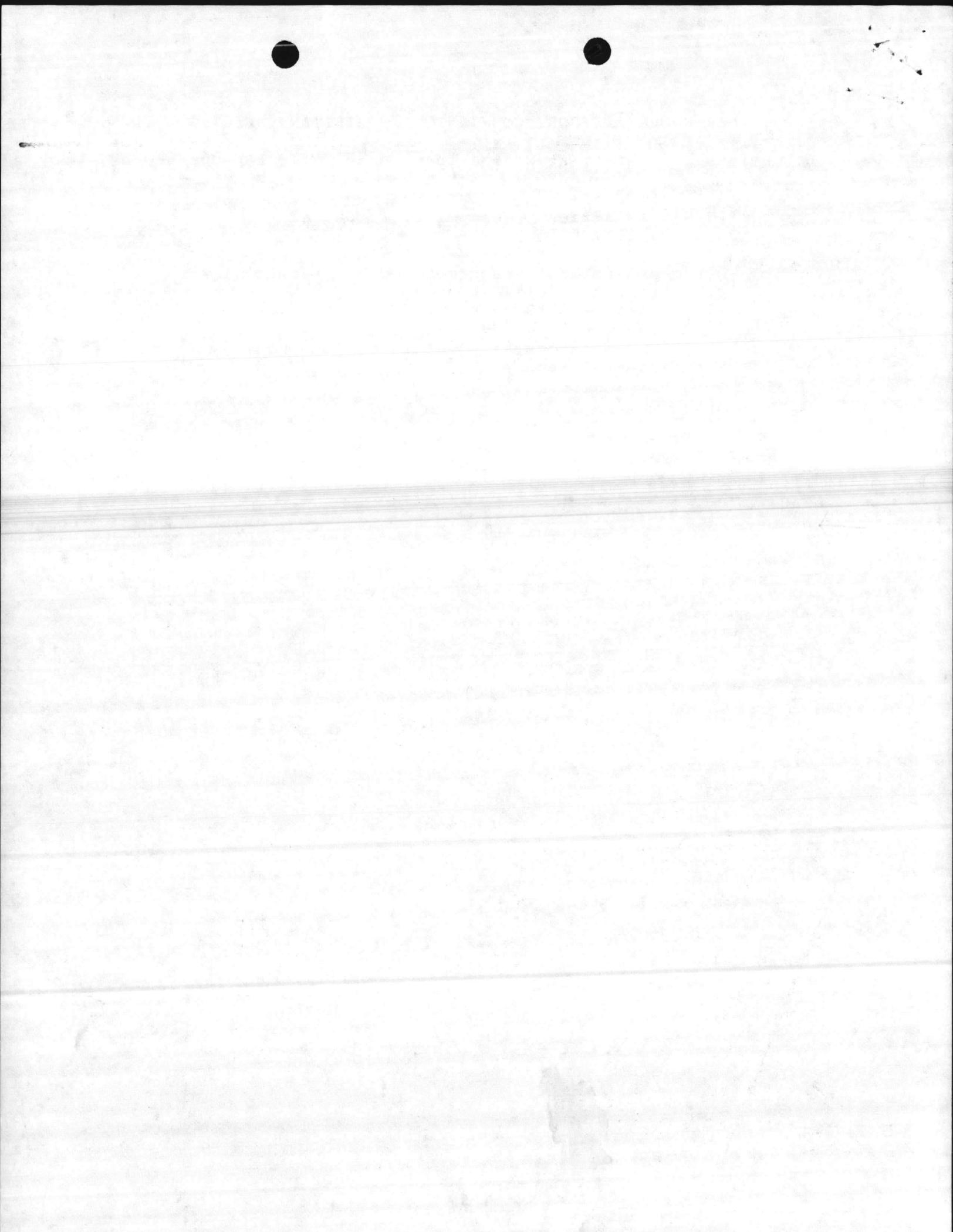
M. C. HARRINGTON
Chief of Staff

Blind copy to:

FAC

→ NREAD

SJA



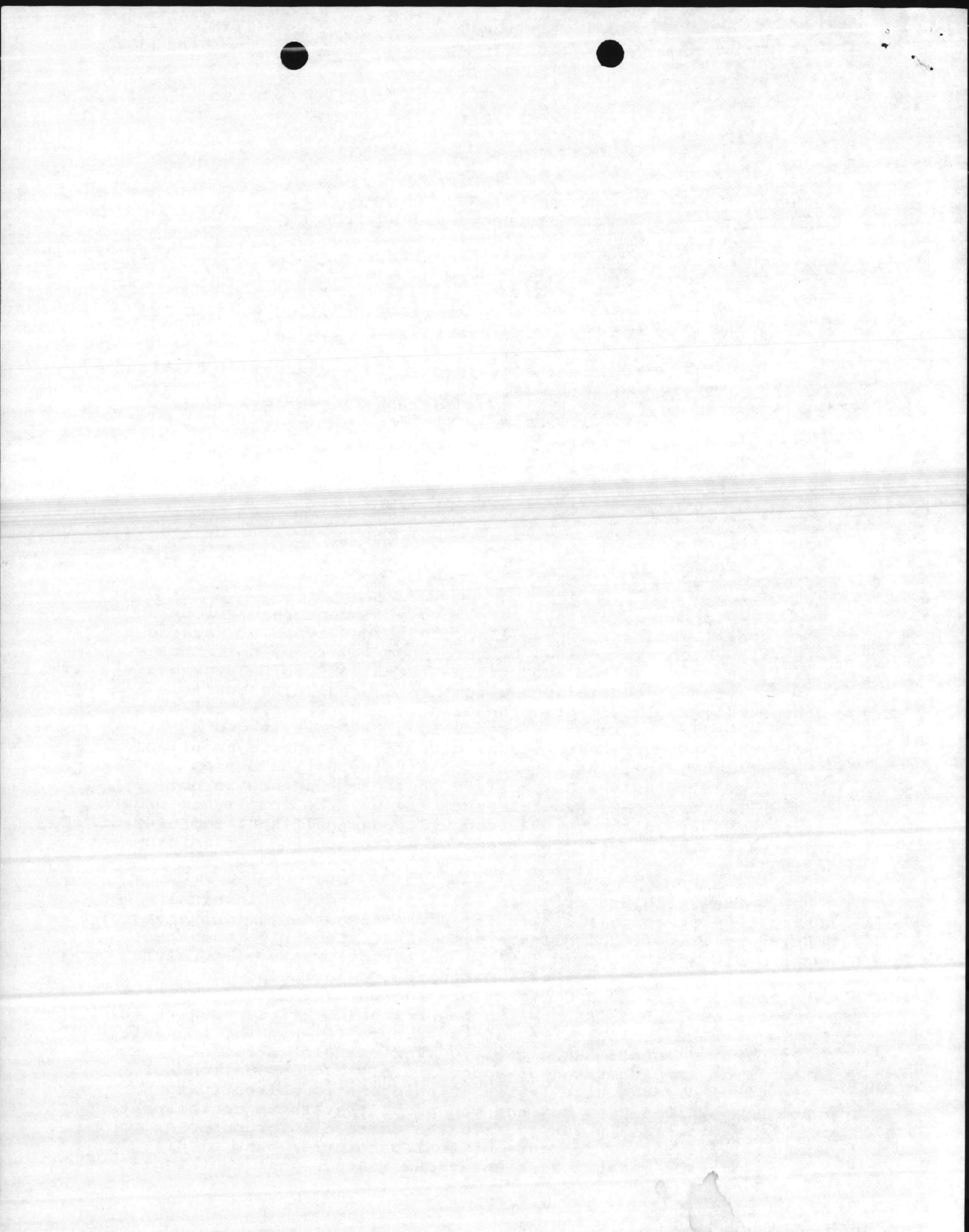
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22 May 87

From: Director, Natural Resources and Environmental Affairs
Division, Marine Corps Base, Camp Lejeune
To: Assistant Chief of Staff, Facilities, Marine Corps Base,
Camp Lejeune
Subj: COMPLIANCE WITH HAZARDOUS WASTE REGULATIONS PROMULGATED
UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)
Ref: (a) EPA Regulations contained in Code Federal Regulations
Title: 40 Parts 260-265
(b) NC Administrative Code 10F, Parts 1 NC Hazardous
Waste Management Rules
(c) Onsite Hazardous Waste Compliance Inspection by EPA
and the NC Div of Health Services (DHS) of 26 Jun 87
(d) Onsite Hazardous Waste Compliance Inspection by EPA
and DHS of 31 Mar - 1 Apr 87
Encl: (1) BO 6240.5A

1. Background

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

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



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

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

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

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

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

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

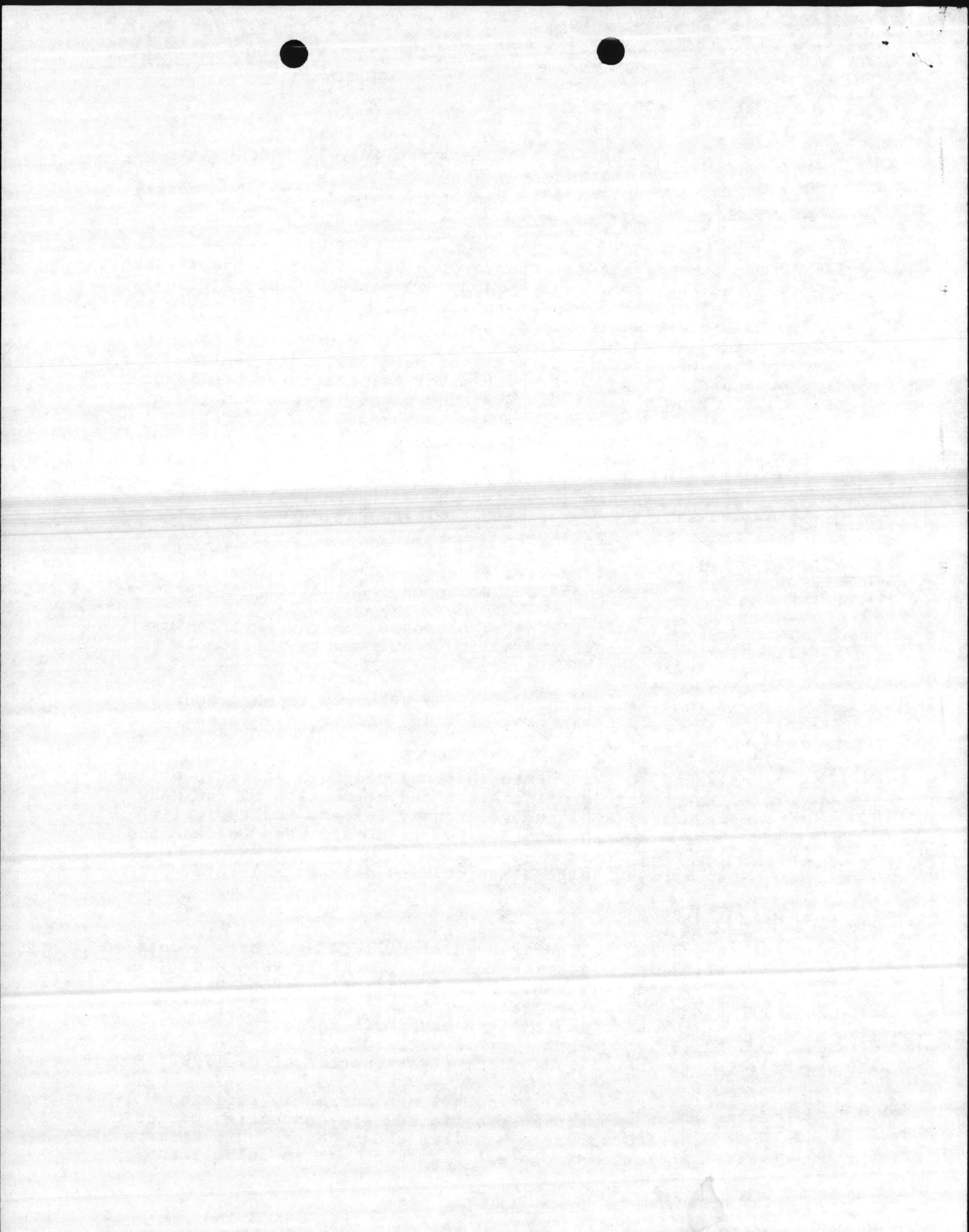
(5) Need to strengthen internal controls and inspections to ensure the prompt identification and correction of the many minor violations of RCRA and references (a) and (b) typical of military shops handling hazardous waste aboard Camp Lejeune and

(6) Improved segregation of used oil and solvents.

2. Current Status

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

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



civilians will require formal training/training records annually.

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

3. Future Action

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

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

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

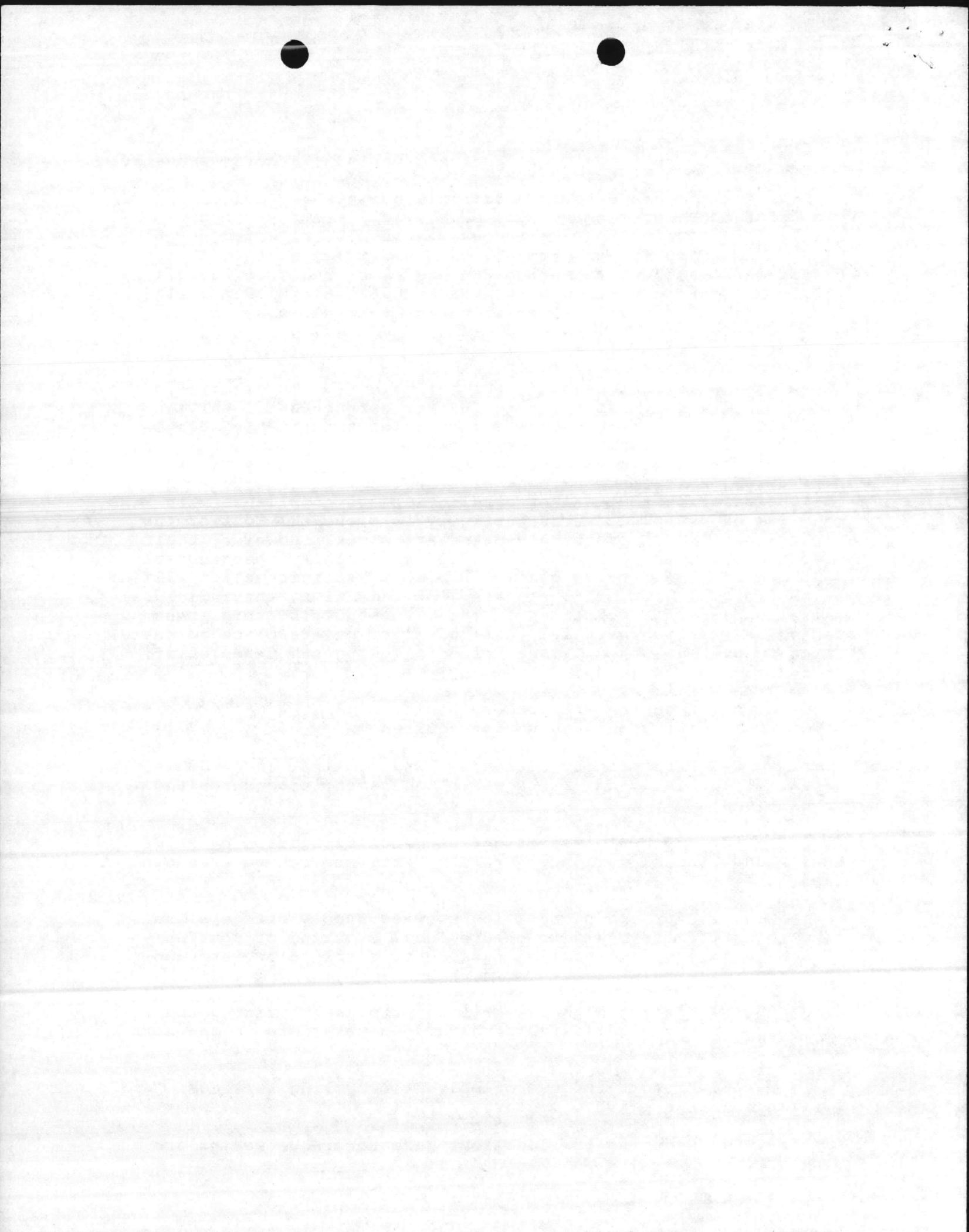
(3) Frequent inspections of generation sites by HMDOs until such time as personnel training programs can be strengthened,

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

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

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

(7) Reducing the locations where hazardous wastes are stored.



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b. The ultimate solution to this problem is for each and every Marine and civilian routinely handling hazardous waste to be properly trained and held accountable for their actions relative to the collection and disposal of hazardous waste. While Marine Corps Base can develop a training program, the total support of battalion and squadron commanders in enforcing the enclosure is essential.

JULIAN I. WOOTEN



From: CG

TO : Distribution List

Subj : Hazardous Waste (HW) Training For Base
Hazardous Material Disposal Officers (HMDO)

Ref (A): BO 6240.5

(B): HW Training Session of 16 Dec 1986

encl (1): Record of Hazardous waste Training (form for)

encl (2): RECORD OF HAZARDOUS WASTE TRAINING HELD ON 16 DEC 86

1. The subject training is required on an Annual basis by Reference (A) and state and federal regulations described therein. Reference (b) met the basic requirement for attendees for Calendar year 1986. HMDO's are requested to update their personal Hazardous waste Training records (see enclosure (1)) to include the course described in enclosure (2). A copy of the updated training record shall be forwarded to the Base Hazardous Material Disposal Coordinator, ^(HMDC) Natural Resources and Environmental Affairs Division, Marine Corps Base, and to the Assistant Chief of Staff, Manpower, Attention Civilian Personnel Director.

2. The Base HMDC, Mr. Sammy Gwynn, extension 2083, is available to answer questions about this matter.

1. Name of Course: HAZARDOUS Waste Management Orientation Course for HAZARDOUS Material Disposal Officers (HMDO)
2. Instructors: DANNY D. SHARPE, Supervisory Ecologist
SAM GWYNN, Biological Technician
3. Description of Course: Two hour formal Classroom Training on the Requirements of the Resource Conservation and Recovery Act; duties and responsibilities of HMDO's and Techniques for implementing a Battalion Hazardous waste management Program
4. LIST of Attendees:

<u>Name of Organization</u>	<u>Representatives at Course</u>
AC/D LOGISTICS	CAPTAIN = PETERS
AC/S MWR BASE MAINTENANCE	DAVE PARKER, DONALD RAYNOR NONE
FIELD MEDICAL SERVICE SCHOOL	LT C.W. HANSEN III, HM1 C.H. SCHROEDER
HEADQUARTERS BATTALION	CWO-2 J.G. WILLIAMS
INFANTRY TRAINING SCHOOL	WO FL. COTE
MARINE CORPS ENGINEER SCHOOL	MAJOR FERRAL, 1ST LT G.L. MCNATT
MARINE CORPS SERVICE SUPPORT SCHOOLS	1ST LT R.D. RULE, MSGT BECKLY
RESERVE SUPPORT UNIT	MSGT SGT BUTCHER
RIFLE RANGE DETACHMENT	MSGT J. U. ADAMS
SUPPORT BATTALION	MSGT C.A. DIEHL

INFO
COPY to:
CPD (TRNG)

1. Name of Course: Hazardous Waste Management Orientation

Course for Hazardous Material Regional Officials

2. Instructor: David D. Sharpe, Supervisory Ecologist

Sam Crayman, Biological Technician

3. Description of Course:

1. Name of Course: HAZARDOUS Waste Management Orientation Course for HAZARDOUS Material Disposal Officers (HMDO)
2. Instructors: DANNY D. SHARPE, Supervisory Ecologist
SAM GWYNN, Biological Technician
3. Description of Course: Two hour formal Classroom Training on the Requirements of the Resource Conservation and Recovery Act; duties and responsibilities of HMDO's and Techniques for implementing a Battalion Hazardous waste management Program
4. LIST of Attendees:

<u>Name of Organization</u>	<u>Representatives at Course</u>
AC/D LOGISTICS	CAPTAIN = PETERS
AC/S MWR	DAVE PARKER, DONALD RAYNOR
BASE MAINTENANCE	NONE
FIELD MEDICAL SERVICE SCHOOL	LT C.W. HANSEN III, HM1 C.H. SCHROEDER
HEADQUARTERS BATTALION	CWO-2 J.G. WILLIAMS
INFANTRY TRAINING SCHOOL	WO F.L. COTE
MARINE CORPS ENGINEER SCHOOL	MAJOR FERRAL, 1ST LT G.L. McNATT
MARINE CORPS SERVICE SUPPORT SCHOOLS	1ST LT R.D. RULE, MSGT BECKLY
RESERVE SUPPORT UNIT	MSGT BUTCHER
RIFLE RANGE DETACHMENT	GYSGT J.V. ADAMS
SUPPORT BATTALION	GYSGT C.A. DIEHL

1. Name of Course: Hazardous Waste Management Orientation

Course for Hazardous Material Disposal Efforts

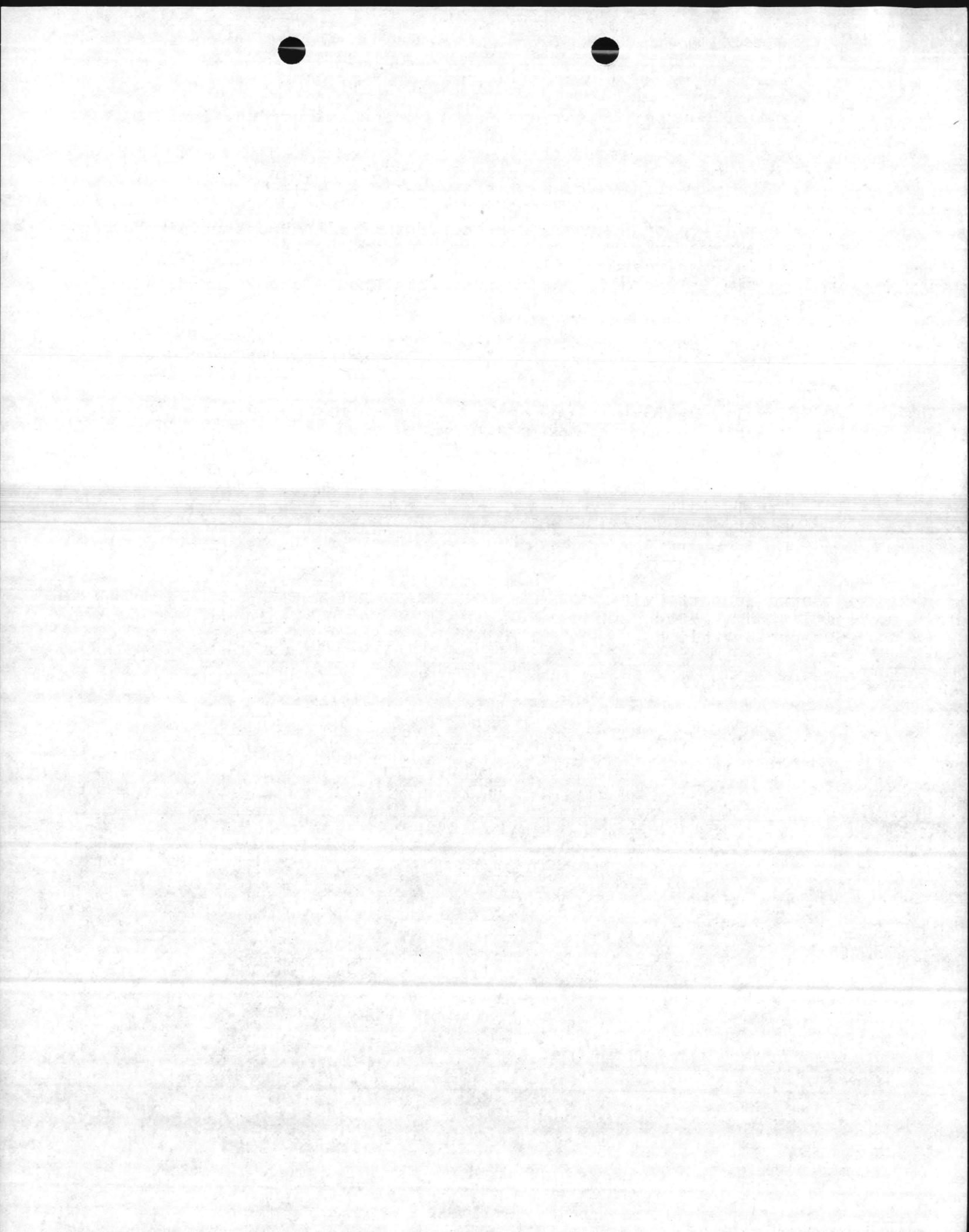
2. Instructors: David D. Sharp, Supervisory Ecologist

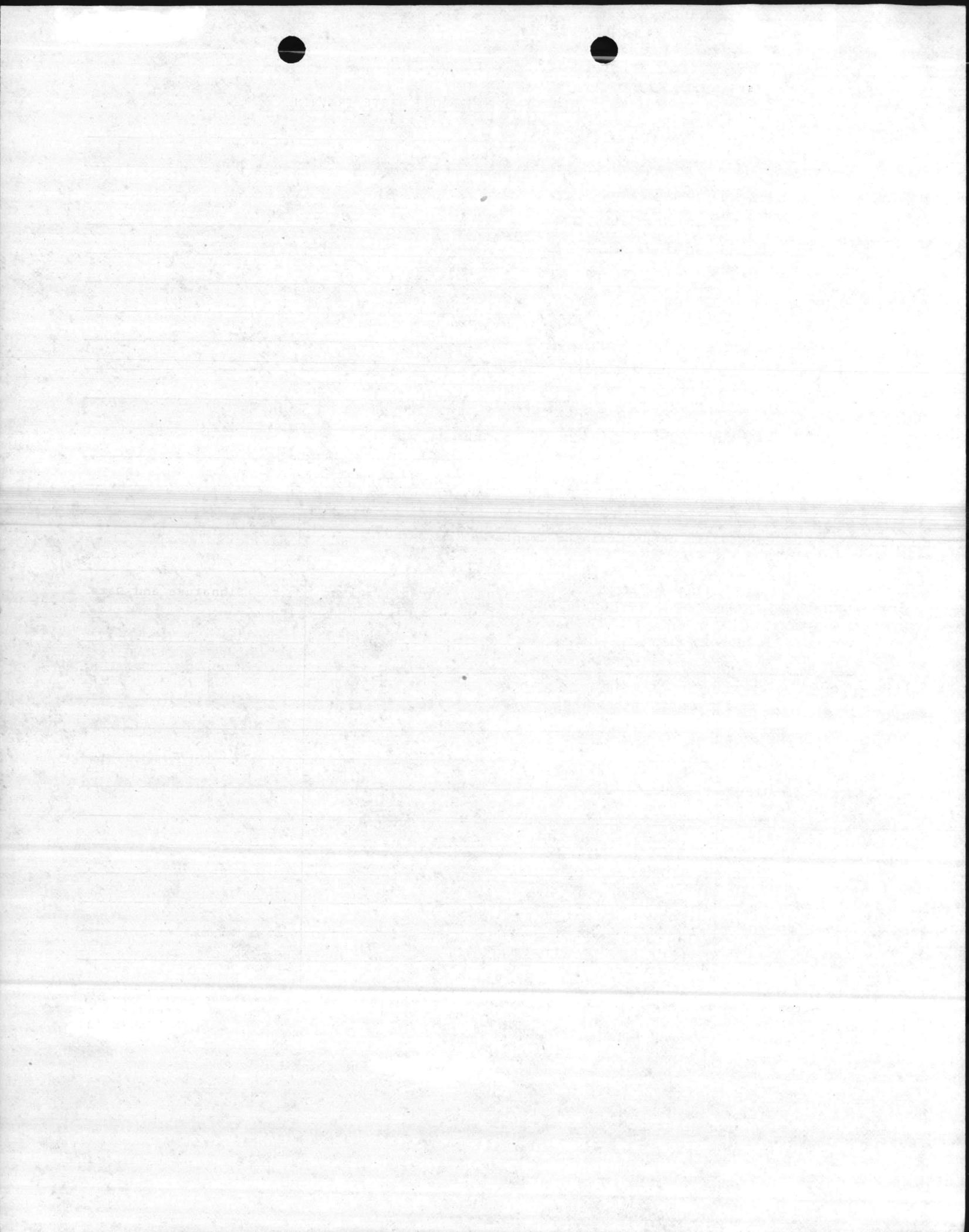
Sam Cupman, Biological Technician

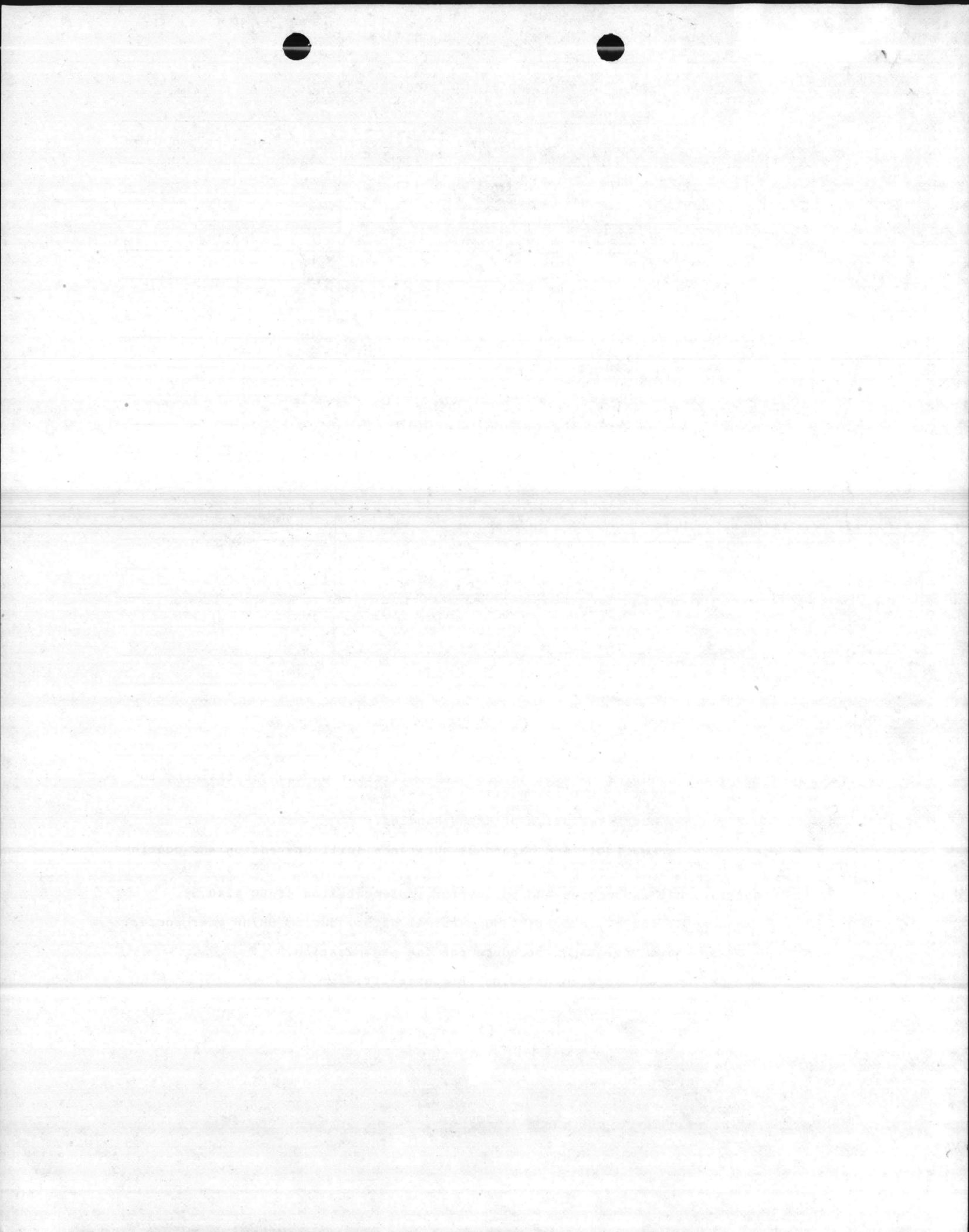
3. Description of Course:

1. Name of Course: Hazardous Waste Management Orientation Course for Hazardous Material Disposal Officers (HMDO)
2. Instructors: Danny D. Sharpe, Supervisory Ecologist
Sammy Gwynn, Biological Technician
3. Description of Course: Two-hour formal classroom training on the requirements of the Resource Conservation and Recovery Act; duties and responsibilities of HMDO's and techniques for implementing a Battalion Hazardous Waste Management Program
4. List of Attendees:

<u>Name of Organization</u>	<u>Representative at Course</u>
AC/S Logistics	Capt Peters
AC/S Morale, Welfare & Recreation	Dave Parker, Donald Raynor
Base Maintenance	None
Field Medical Service School	Lt C. W. Hansen, II
	HM1 C. H. Schroeder
Headquarters Battalion	CWO-2 J. G. Williams
Infantry Training School	WO F. L. Cote
Marine Corps Engineer School	Maj Ferral
	1stLt G. L. McNutt
Marine Corps Service Support Schools	1stLt R. D. Rule
	MSgt Becky
Reserve Support Unit	MGySgt Butcher
Rifle Range Detachment	GySgt J. V. Adams
Support Battalion	GySgt C. A. Diehl







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Base Safety ATT

MESSAGE HANDLING INSTRUCTIONS

ADMIN

R/S/Tex

FROM: LANTNAVFACENCOM NORFOLK VA

TO: ABL CUMBERLAND MD

ARMED FORCES EXPERIMENTAL TNG ACTY CAMP PEARY VA

FCTCLANT DAM NECK VA

HPDTA HERTFORD NC

INACTSHIPFAC PORTSMOUTH VA

LANTCOMOPSUPPFAC NORFOLK VA

MARCORB CAMP LEJEUNE NC

MARCORCRUITSTA LOUISVILLE KY

MARCORCRUITSTA RICHMOND VA

MARCORCRUITSTA SOUTH CHARLESTON WV

MARCORESTRACEN BALTIMORE MD

MARCORESTRACEN LYNCHBURG VA

MARCORESTRACEN RICHMOND VA

MARCORESTRACEN ROANOKE VA

MARCORESTRACEN SOUTH CHARLESTON WV

MCAS CHERRY POINT NC

MCAS NEW RIVER NC

NAVAVNDEPOT CHERRY POINT NC

NAVAVNDEPOT NORFOLK VA

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P. A. Rakowski

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

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

NAME, TITLE, OFFICE SYMBOL, AND PHONE

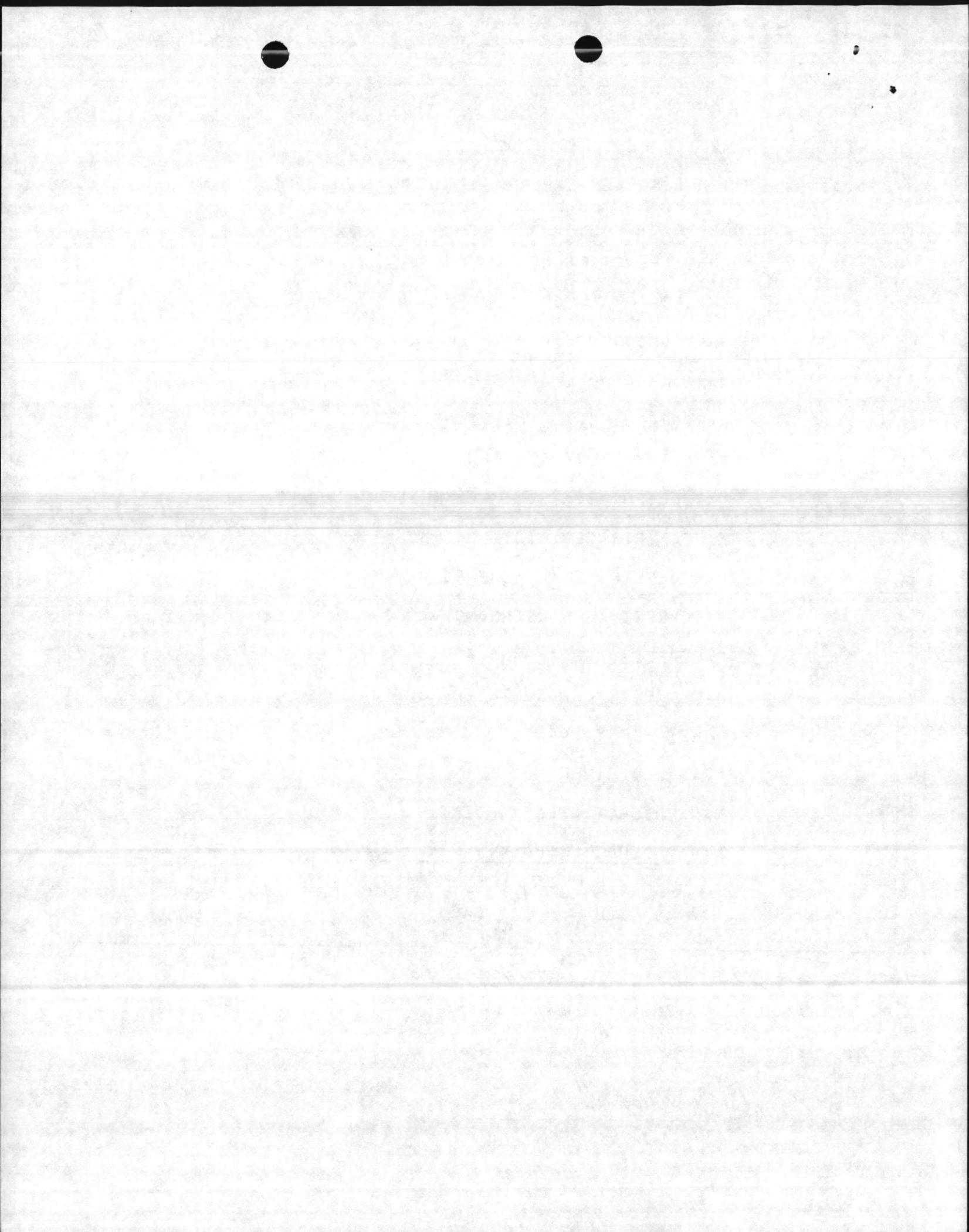
R.D. CROWSON, DIR. UTIL. DIV., 4-9537

114, 114S

R.D. Crowson

UNCLASSIFIED 1142/6 6/11/87

NAVGRAM



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MESSAGE HANDLING INSTRUCTIONS

ADMIN

FROM: NAS NORFOLK VA (2 CYS)

TO: NAS OCEANA VA

NAVCOMMSTA ROOSEVELT ROADS RQ

NAVHOSP CAMP LEJEUNE NC

NAVHOSP PORTSMOUTH VA

NAVMARCORESCEN LITTLE CREEK VA

NAVMARCORESCEN LOUISVILLE KY

NAVMARCORESCEN NEWPORT NEWS VA

NAVMARCORESCEN RICHMOND VA

NAVMARCORESCEN ROANOKE VA

NAVMARCORESCEN WHEELING WV

NAVORDSTA LOUISVILLE KY

NAVPHIBASE LITTLE CREEK VA

NAVRADSTA R SUGAR GROVE WV

NAVRADTRANSFAC DRIVER VA

NAVRESCEN BALTIMORE MD

NAVRESCEN CUMBERLAND MD

NAVRESCEN HUNTINGTON WV

NAVRESCEN LEXINGTON KY

NAVRESCEN PARKERSBURG WV

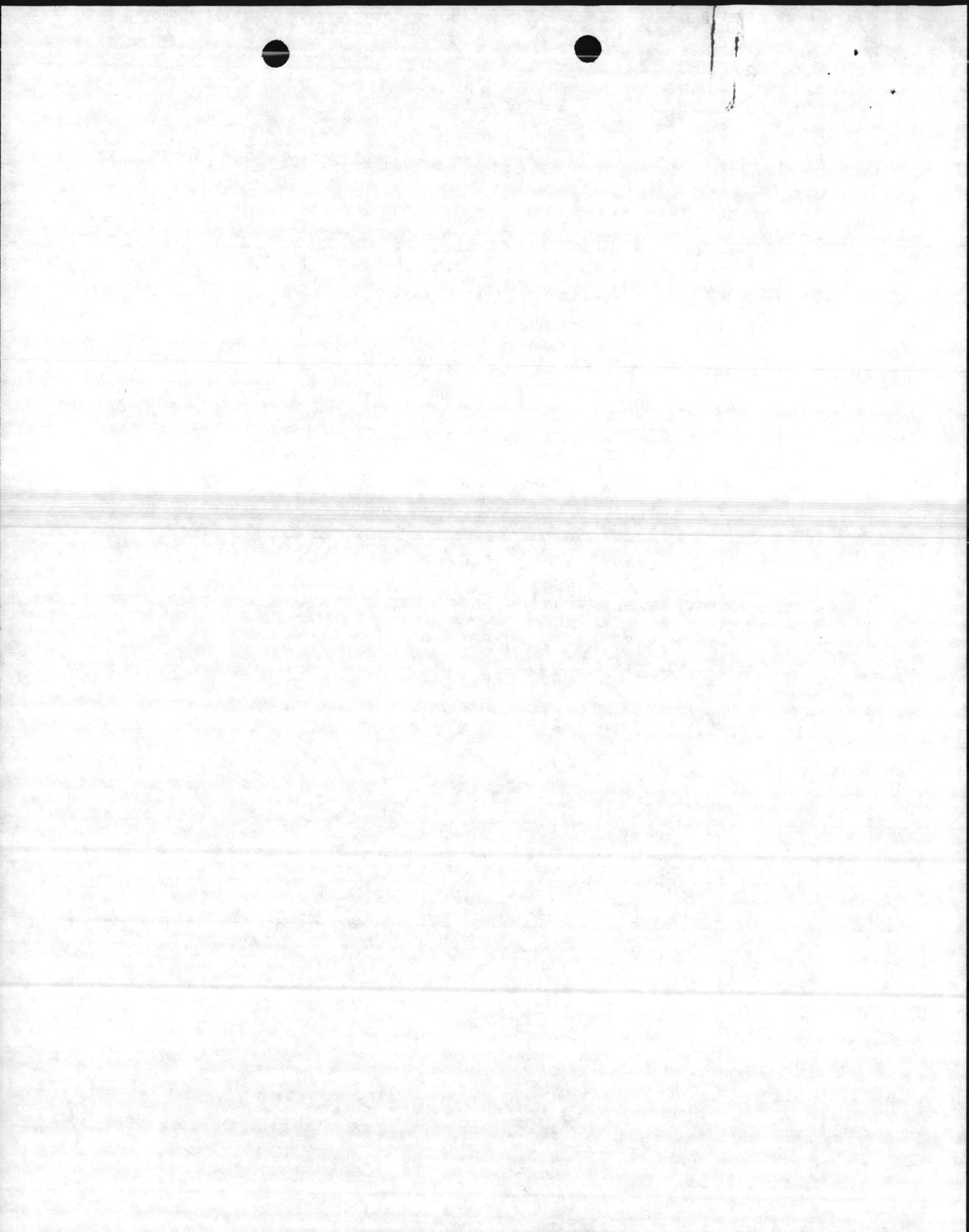
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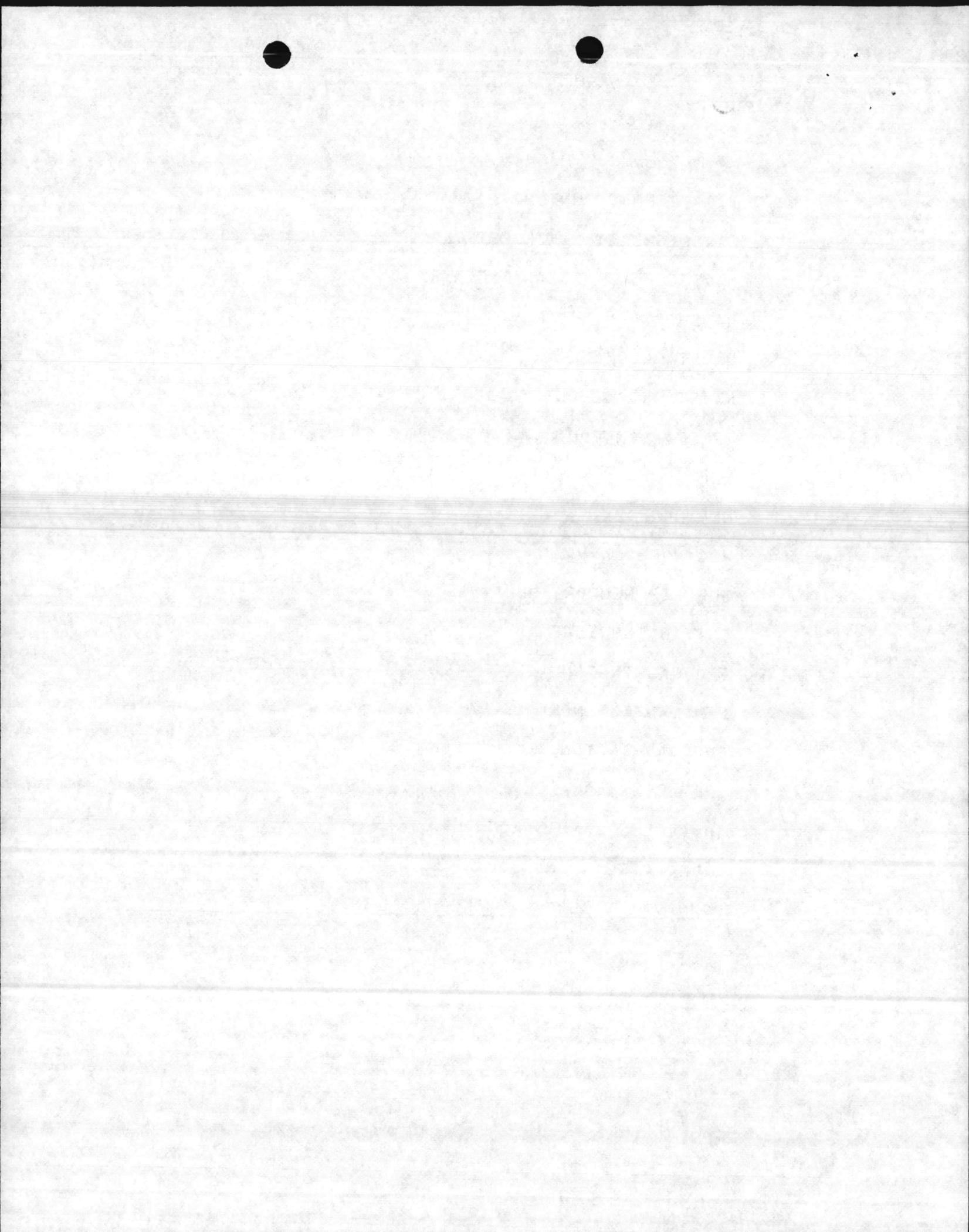
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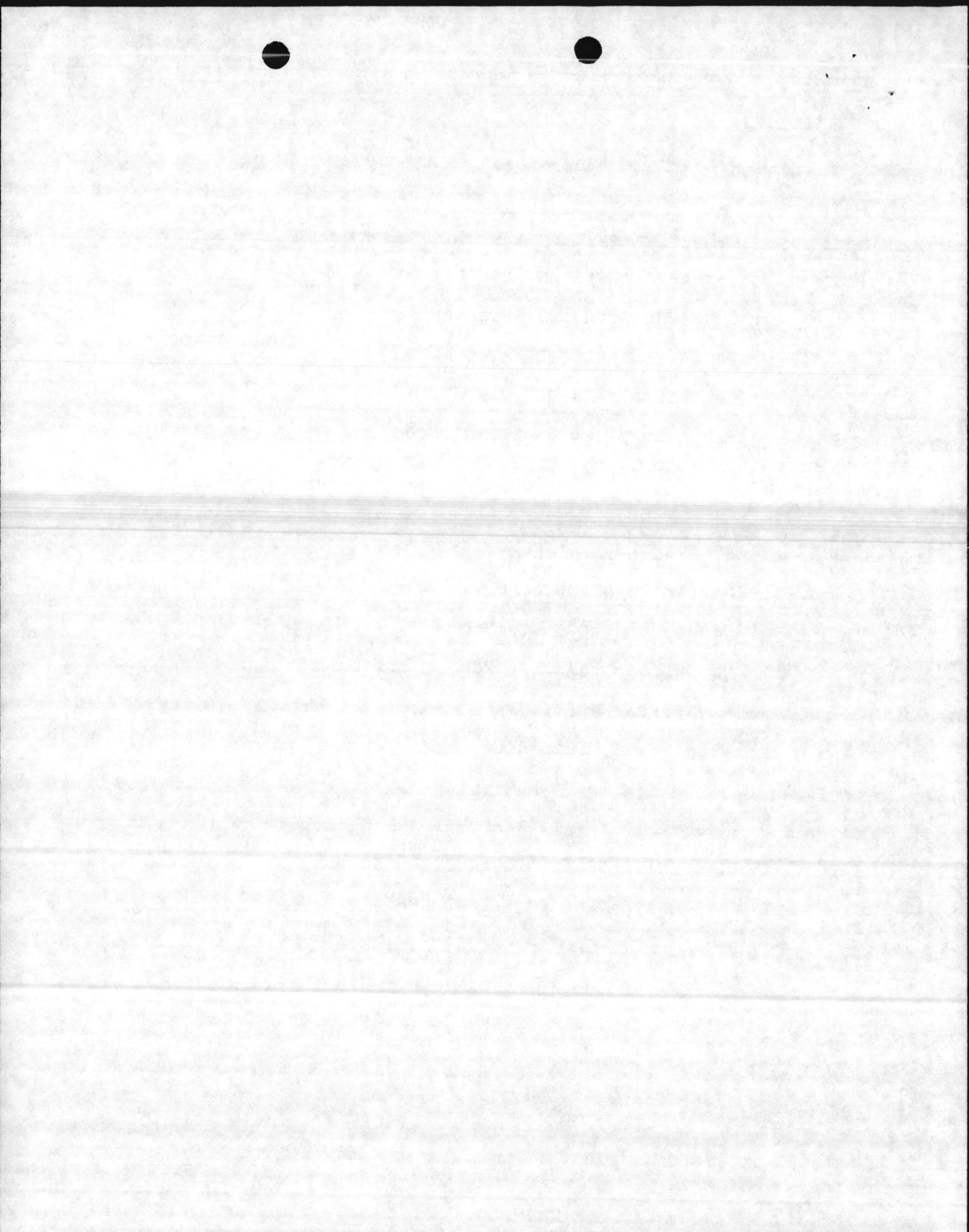
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MESSAGE HANDLING INSTRUCTIONS

ADMIN

FROM: WESTNAVFACENGCOM SAN BRUNO CA
 TO: PACNAVFACENGCOM PEARL HARBOR HI
 CHESNAVFACENGCOM WASHINGTON DC

UNCLAS //N06280//

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

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

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

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

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

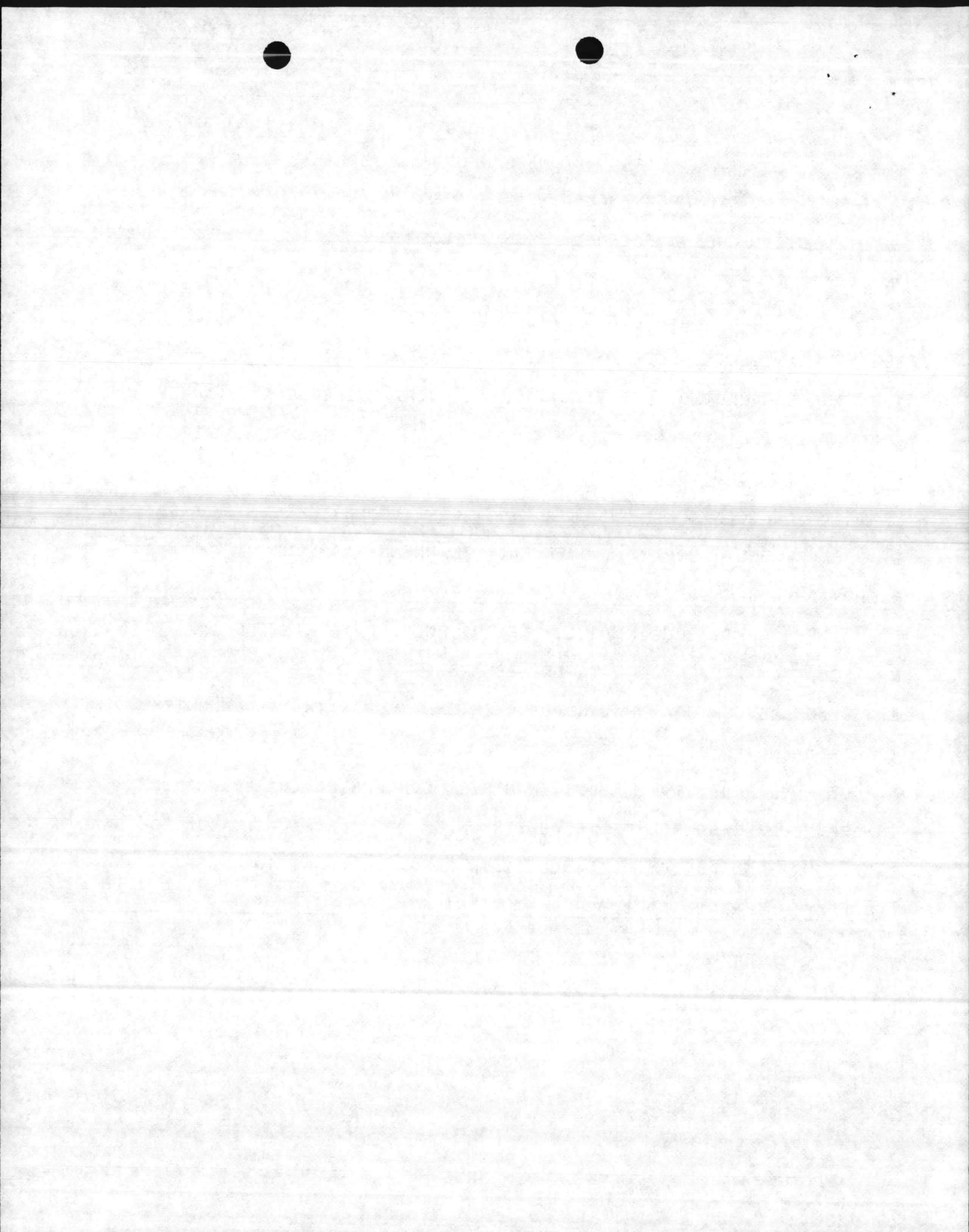
1. WE HAVE RECEIVED VARIOUS INQUIRIES CONCERNING COMPLYING WITH
 INFORMATIONAL AND RELATED REQUESTS UNDER THE SUBJECT SECTION 302 OF
 SARA. WRITTEN POLICY GUIDANCE IS IN PREPARATION AT THE WASHINGTON
 LEVEL OF THE NAVY AND DOD. IN THE INTERIM, WE RECOMMEND THAT YOU

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SPECIAL INSTRUCTIONS

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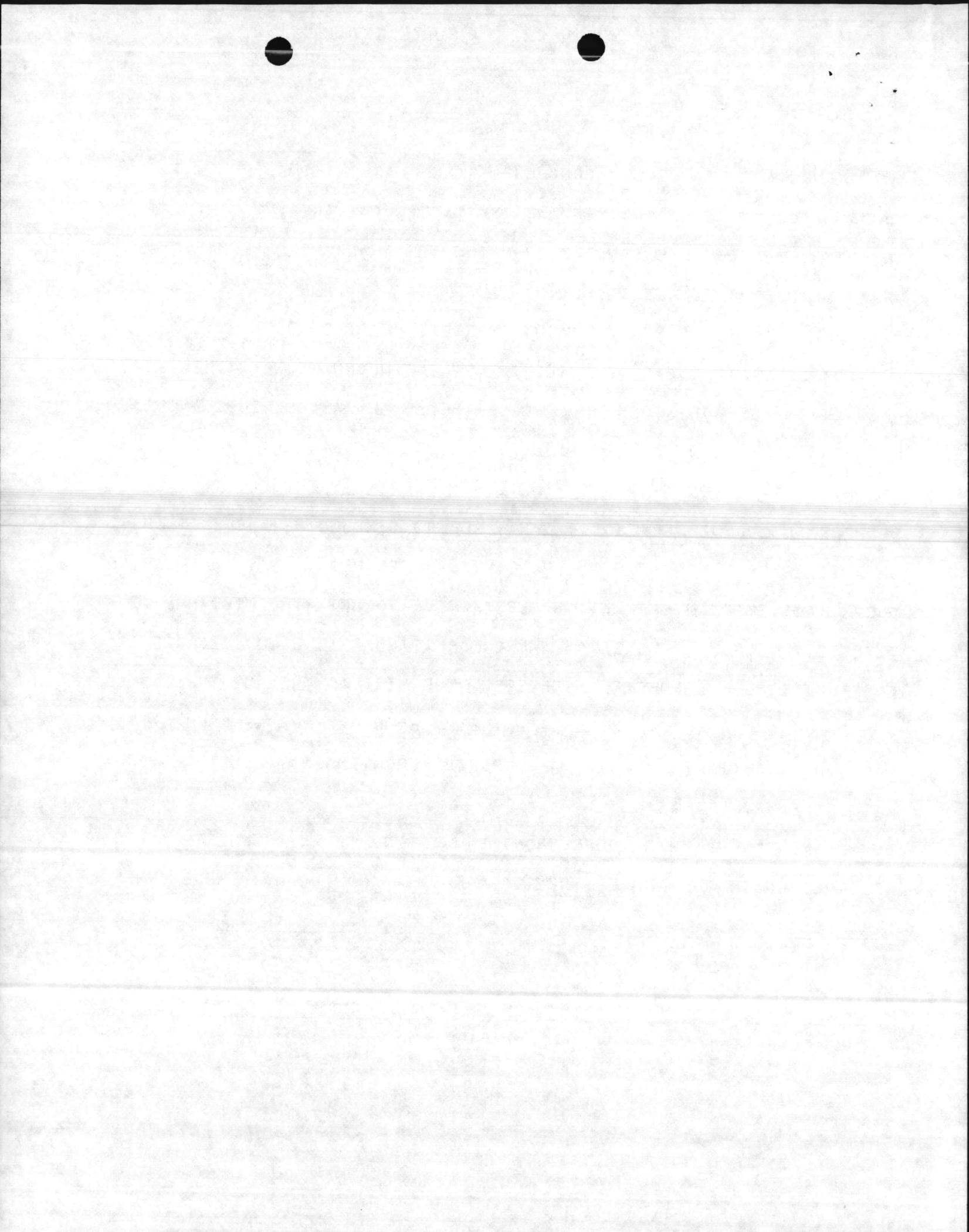
ADMIN

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

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

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

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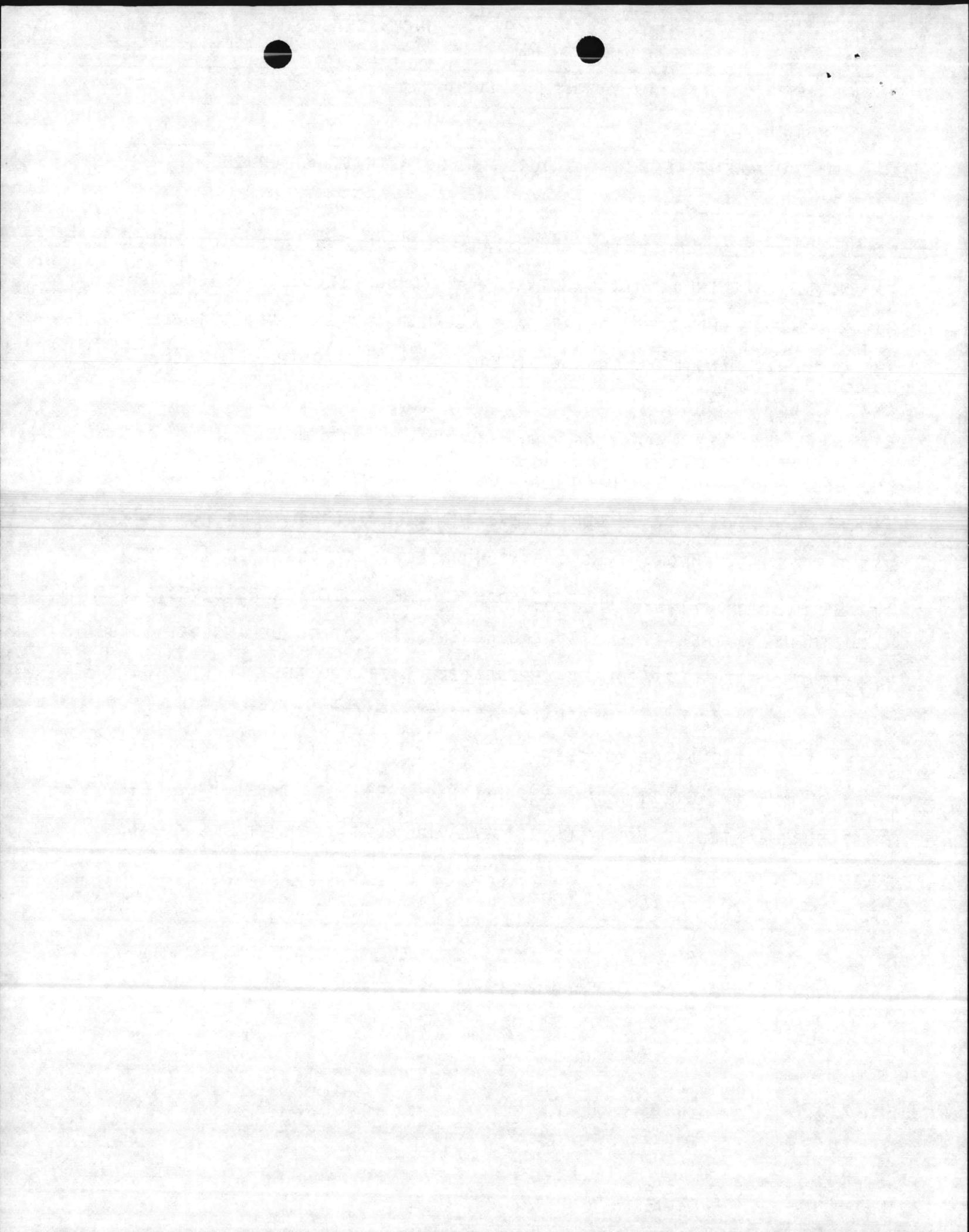
A. FEDERAL AGENCIES SUCH AS OURS ARE NOT STRICTLY REQUIRED TO COMPLY WITH TITLE III OF SARA. WE WERE NOT INCLUDED IN THE DEFINITION OF A PERSON IN EITHER SARA SECTION 329 OR 40 CFR 300.92 TO INSURE THAT INFORMATION DETRIMENTAL TO OUR SECURITY INTERESTS IS NOT RELEASED. HOWEVER, WE ARE A CONCERNED AND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

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

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

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

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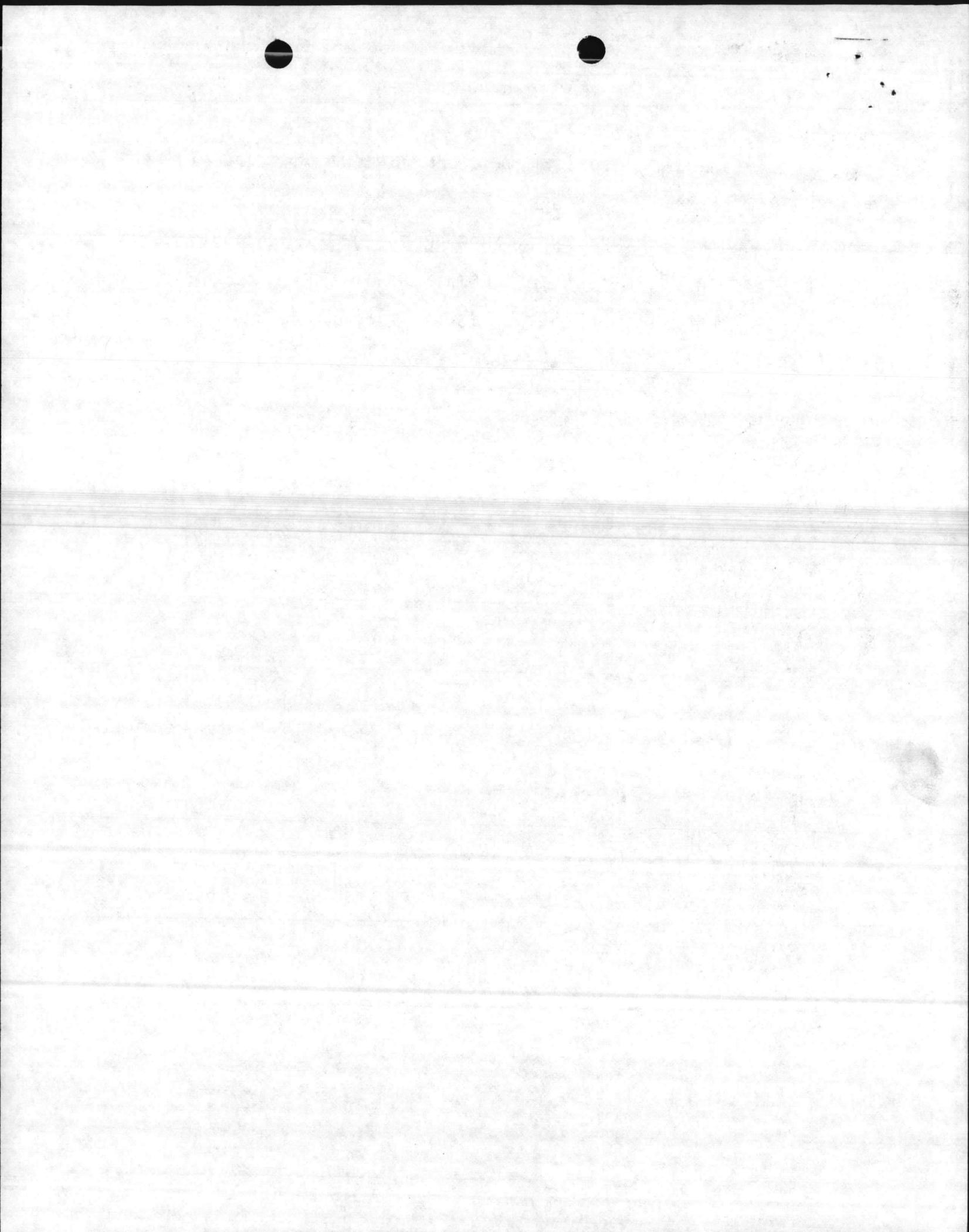
ADMIN

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

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

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NAVGRAM



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Memorandum

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DATE: 21 Jul 87

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

SUBJ: BOILER WATER TREATMENT PROGRAM

Encl: (1) Boiler Water Analyses

1. This memorandum is submitted as requested by the Supervisory Ecologist, in response to information provided to the Environmental Control Specialist by the Utilities General Foreman, that the subject program had significantly deteriorated in the last few weeks.

2. Even though it had an adverse effect on performing my present duties as an Environmental Control Specialist, I spent one day, every two weeks, assisting steam generation with the subject program during the period of 25 February 1987 through 5 June 1987. When it became obvious that the Base Maintenance Officer was not going to get the Chemist position filled in a timely manner, a decision was made by the Director of Utilities to have the Boiler Plant Operator Leaders assume the duties of the Utilities Chemist regarding boiler water treatment. The leaders would provide quality assurance monitoring. It was agreed that I would train the leaders.

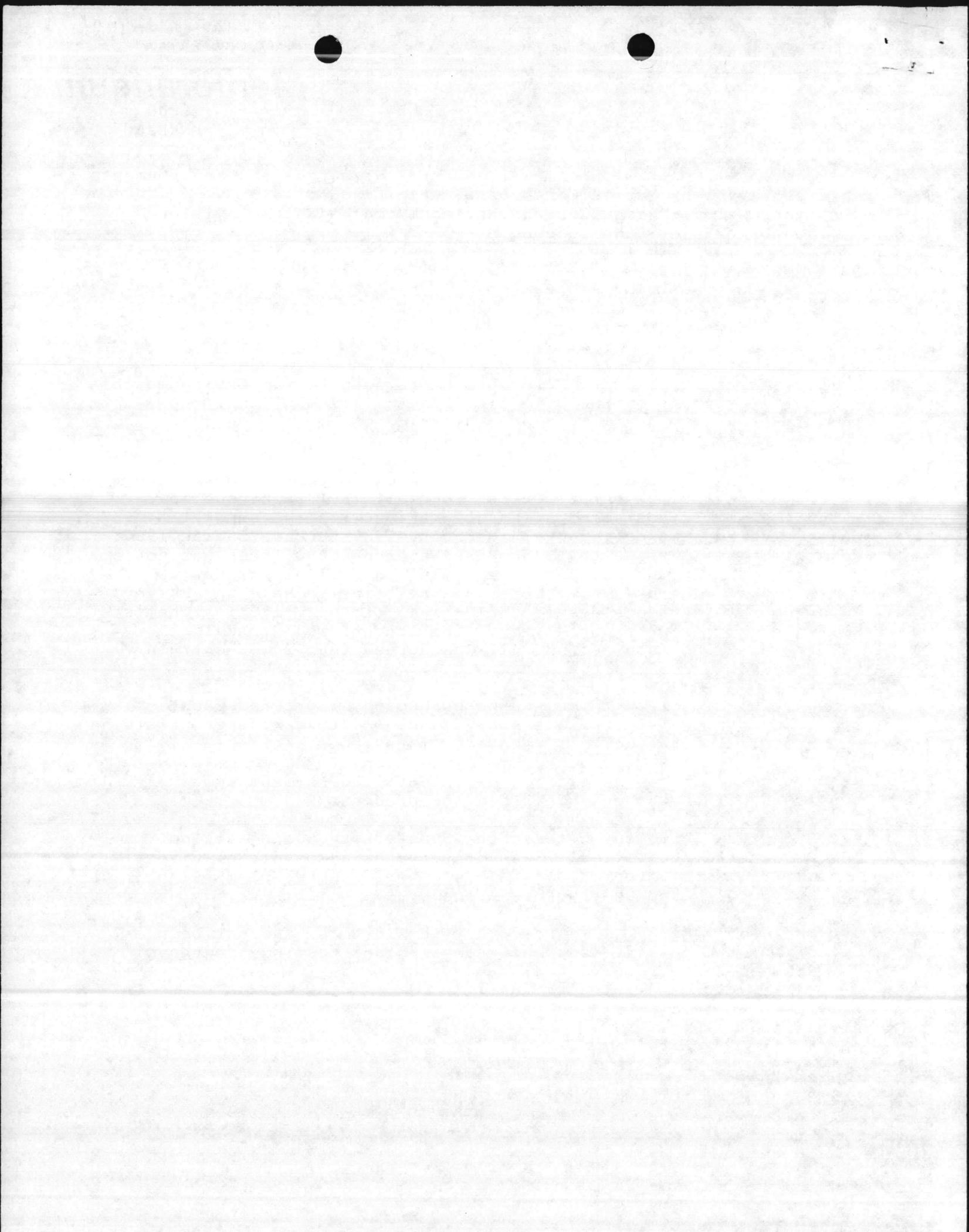
3. Working closely with Mr. Kenneth Shepard, I briefed each leader on how to gather and evaluate data and to make appropriate adjustments to the chemical program. I reviewed enclosure (1) with Mr. Shepard and provided copies to each of the leaders. Steam Generation has a staff of excellent leaders, and I was impressed with how they understood the process.

4. By mutual agreement between the Supervisory Ecologist and the Director of Utilities, I was to serve as a consultant directly to the Utilities Director, if he encountered any problems with the subject program and the new procedures.

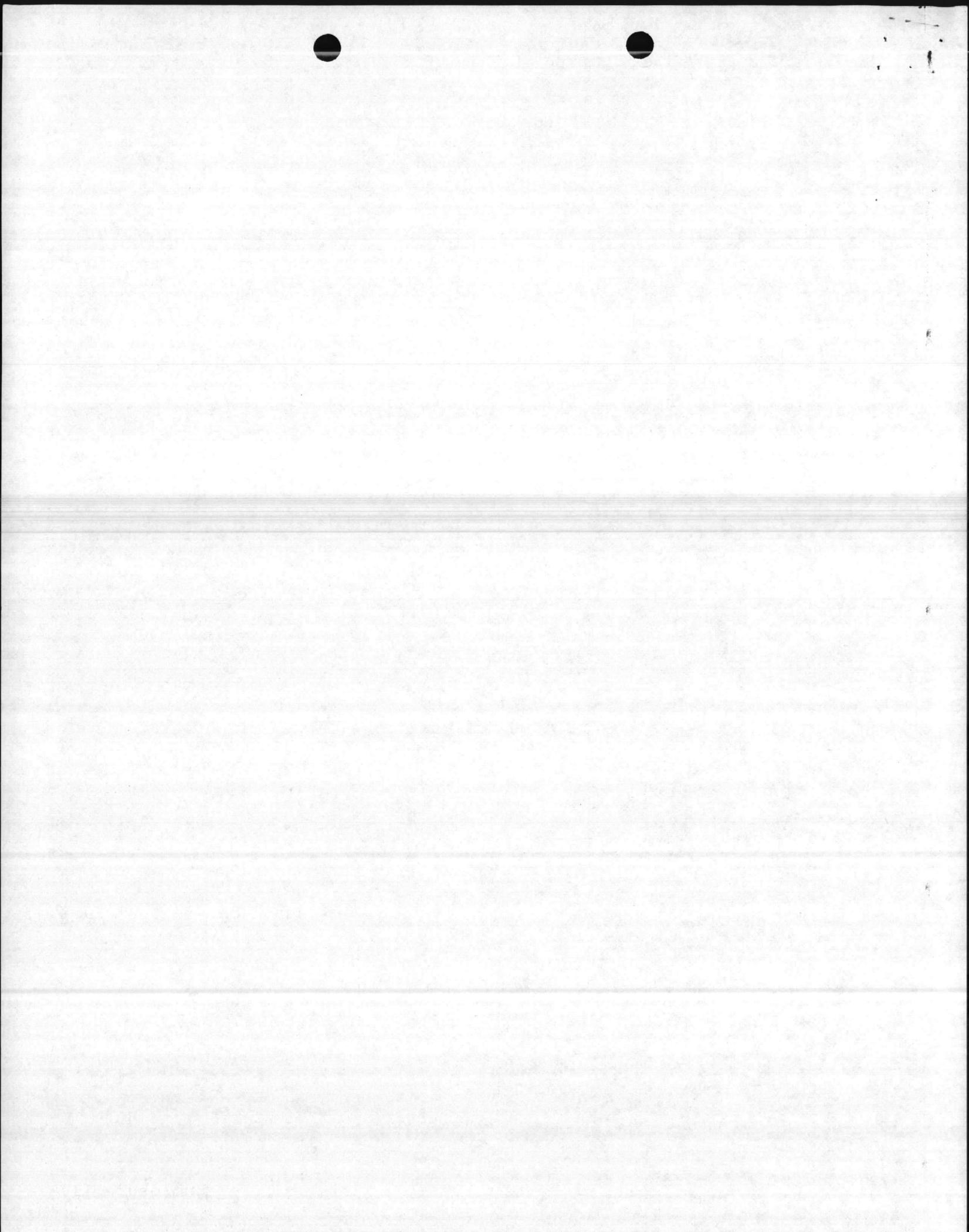
5. On 17 July, 1987, I learned that the leaders have not been performing the quality assurance sampling and testing, and have not submitted any reports to the Director of Utilities.

6. The purpose of this memorandum, is to inform you of this situation.

GLENÉE SMITH



BOILER WATER ANALYSES



ALKALINITIES

"P" Alkalinity

- (1) Measure 25 ml of water into casserole dish.
- (2) Add 2 drops of phenolphthalein indicator. If the water turns red (and boiler water should) titrate with sulfuric acid until the red color just disappears and the natural color of the sample appears.
- (3) Take the buret reading and multiply it by 40. This will give you the "P" alkalinity. DO NOT POUR SAMPLE OUT! SAVE IT TO RUN "M" Alkalinity. ALSO, DO NOT REFILL BURET. BEGIN TITRATING FOR THE "M" ALKALINITY WHERE YOU STOPPED TO GET THE "P" ALKALINITY.

"M" Alkalinity

- (1) TO THE SAME SAMPLE THAT YOU USED FOR THE "P" ALKALINITY TEST, add 3 or 4 drops of methyl purple indicator. If the water turns green titrate with sulfuric acid until the green color turns to a red-purple color.
- (2) Take the buret reading and multiply it by 40.

"OH Alkalinity

- (1) The method for hydroxide alkalinity is considered accurate only within 10%. Due to this, the following equation is used to calculate the "OH" Alkalinity: $(2 \times \text{"P" Alkalinity}) - \text{"M" Alkalinity} = \text{"OH" Alkalinity}$.

Example: If your "P" alkalinity is 320 and your "M" alkalinity is 400, you would calculate for your "OH" alkalinity as follows:

$$(2 \times 320) - 400 = \text{OH alkalinity}$$
$$640 - 400 = 240$$

Therefore your OH alkalinity is 240.



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BOILER WATER

CHLORIDES (Cl) TEST

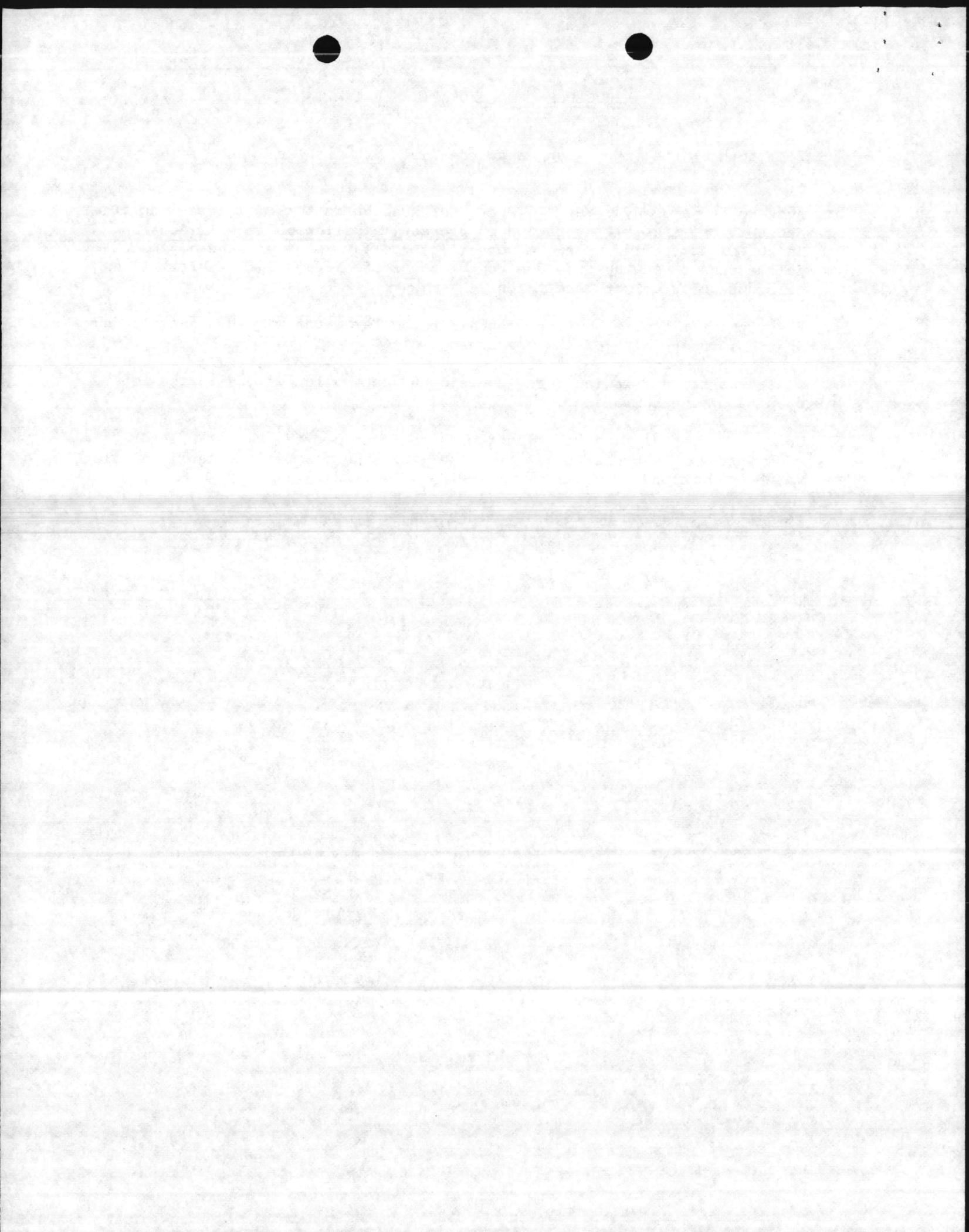
1. Pour 25 ml of water into casserole dish.
2. Add 2 drops of Phenolphthalein Indicator. If water turns red (and boiler water should) titrate with N/50 Sulfuric Acid until the red color just disappears and the natural color of the sample appears.
3. Add 2 ml of Hydrogen Peroxide to the sample, if Sulfite (SO_3) is used in boiler water treatment.
4. Add 5 drops of Chromate Indicator to the sample.
5. Titrate with Silver Nitrate slowly until the yellow color turns a light orange-red.
6. Take the burette reading. Multiply this reading by 40 to get the Chloride reading.



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PROCEDURE FOR HYDRAZINE TEST KIT

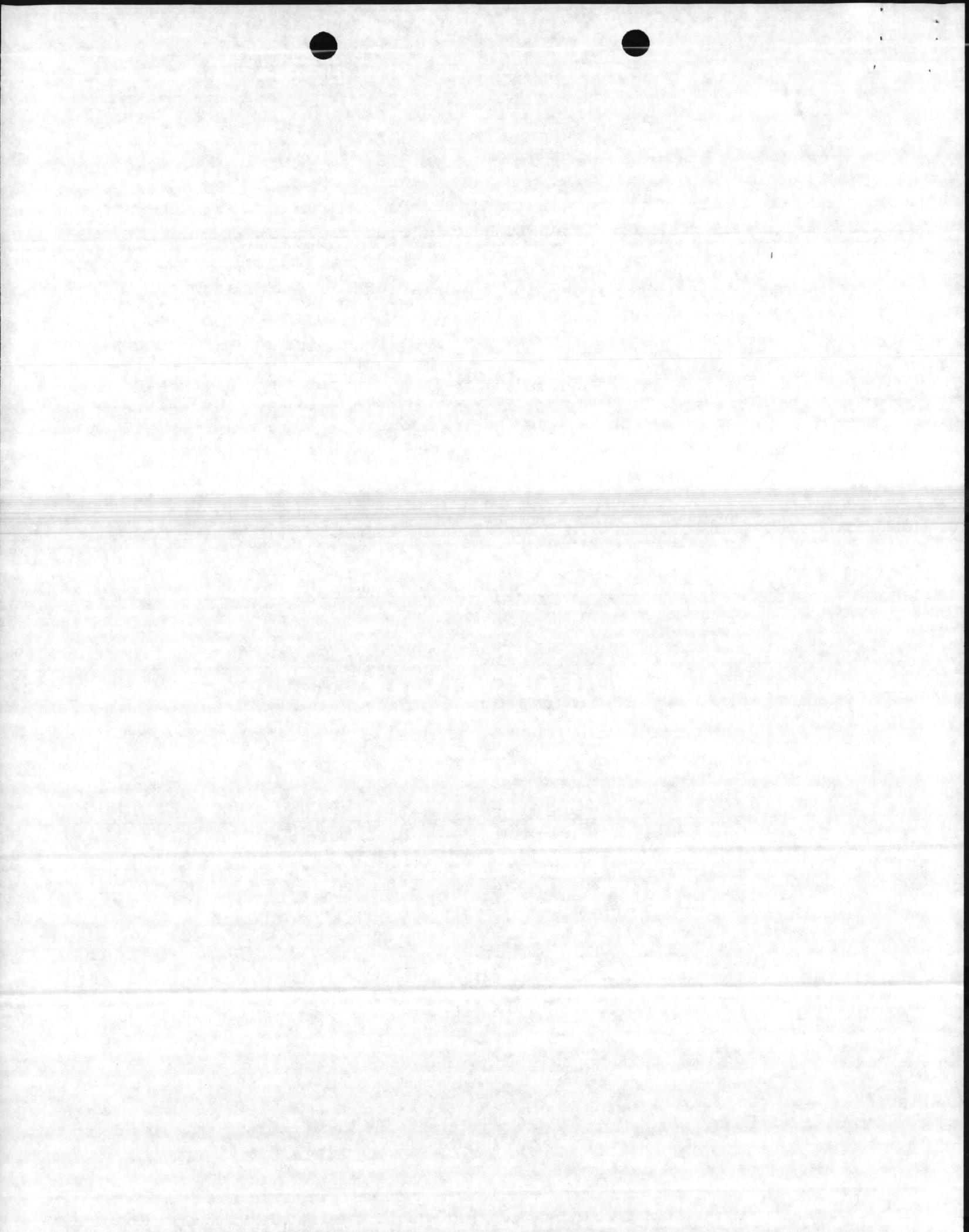
1. Fill both of the viewing tubes to the 5 ml mark with the water to be tested.
2. Add two drops of HydraVer™ II Hydrazine Reagent to one of the viewing tubes and swirl to mix. If hydrazine is present, a yellow color will develop in the first viewing tube. A very slight yellow color will be apparent in the second viewing tube due to the color of the reagent itself. Allow 15 minutes for color development.
3. Place the first viewing tube (containing boiler water with HydraVer II drops) in the right opening of the comparator.
4. Place the second viewing tube (containing just boiler water) in the left opening of the comparator.
5. Hold the comparator up to a light such as a window, the sky or a light, and view through the openings of the comparator. Rotate the disc until a color match is obtained.
6. Read the ppm Hydrazine (N_2H_4) through the scale window.



SULFITE (SO₃) TEST

- (1) Measure 50 ml of water into casserole dish.
- (2) Add 1 or 2 drops of phenolphthalein indicator.
- (3) Add 1 scoop of starch at a time, stirring well after each scoop. After the water turns from pink to clear, add 1 extra scoop of starch while stirring.
- (4) Titrate with iodide/iodate until a permanent faint blue color appears.
- (5) Take the buret reading and multiply by 10 to get the SO₃ reading.

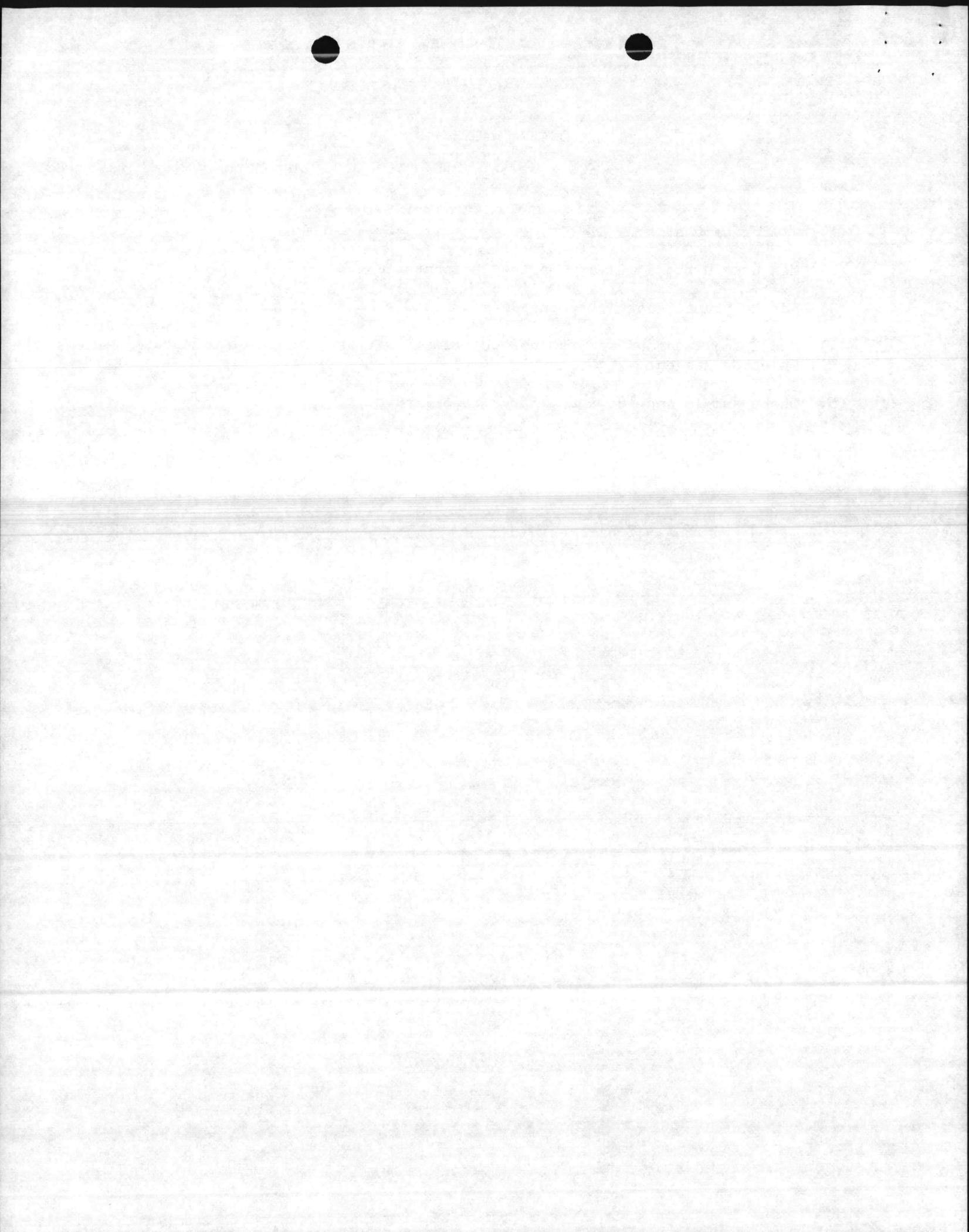
The SO₃ test is run at FC-202, BA-106, and M-230 unmanned plants.



BOILER WATER

PHOSPHATE (PO_4) TEST

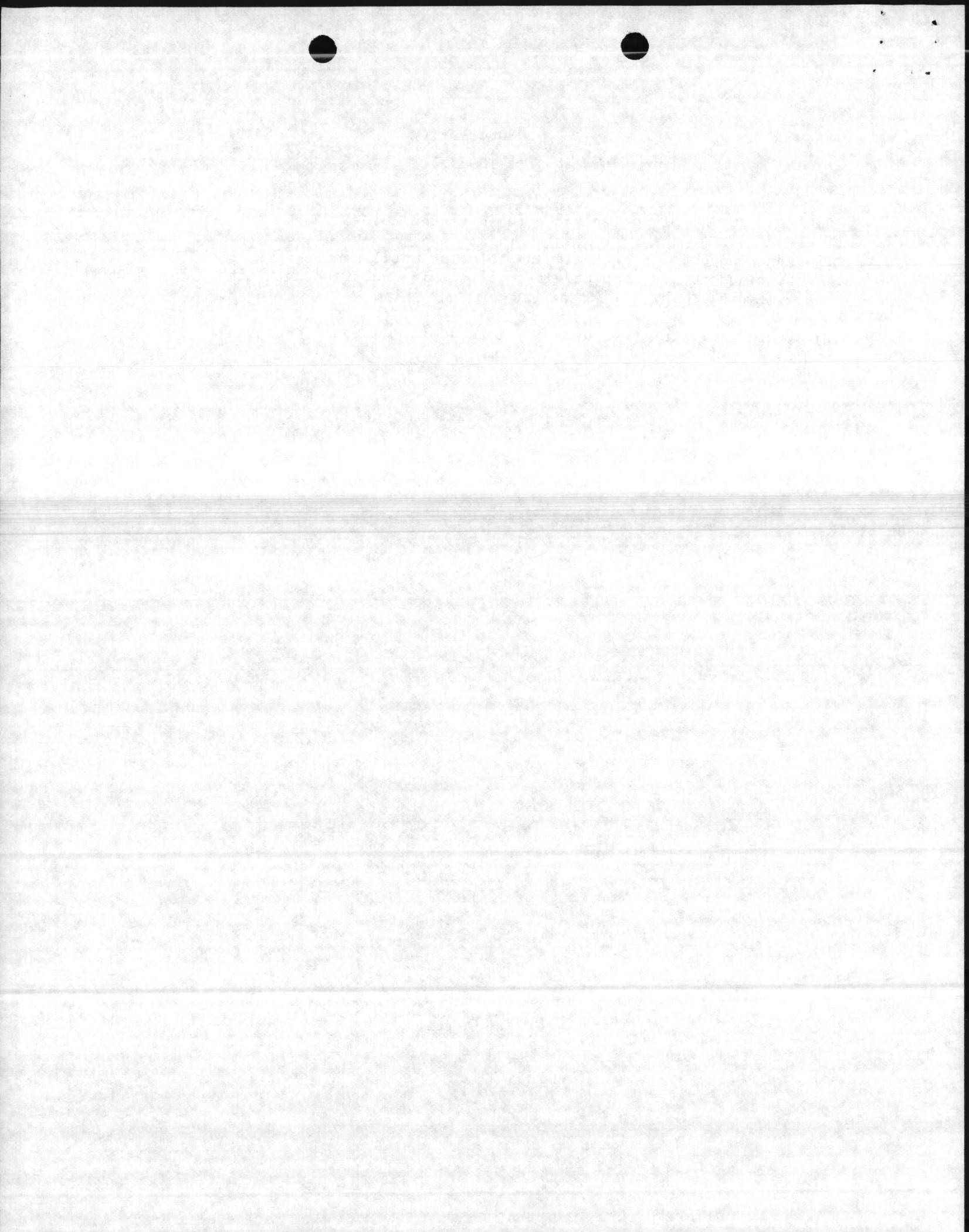
- (1) Filter sample.
- (2) Measure to the 5 ml mark of the Phosphate Tube.
- (3) Add Molybdate Reagent to the 15 ml mark of the Phosphate Tube.
- (4) Add 2 small scoops of Stannous Chloride Power or 2 drops of Stannous Chloride Reagent.
- (5) Shake sample and let stand for 2 to 3 minutes.
- (6) Read Phosphate reading in the color slide.



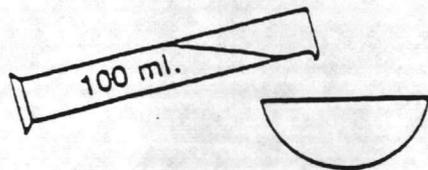
CONDUCTIVITY

TDS

- (1) Pour 100 ml of boiler water to be tested into a flask.
- (2) Add conductivity neutralizing solution until sample turns pink.
Continue to add conductivity neutralizing solution until the sample turns from pink to clear.
- (3) Pour sample into conductivity meter cell. Read conductivity.

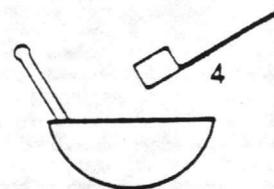


1. Measure and transfer a 100 ml water sample to the casserole.

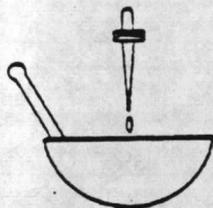


If sample is turbid, it should be filtered before measurement.

2. Add 4 level scoops of Reagent No. 1 to the casserole and stir.



3. If the solution is yellow, add 1 drop of Reagent No. 2 and proceed to step 4.



If the solution is purple, add Reagent No. 2 dropwise, while stirring, until the solution turns yellow. Then add 1 extra drop of Reagent No. 2 and proceed to step 4.

4. Fill burette to the 0.0 mark with Reagent No. 3

Titrate the sample with Reagent No. 3 slowly, at a rate not to exceed thirty drops per minute.

Color change is from yellow to rose red, the endpoint.

Note the number of ml titrated. When the endpoint is reached, there will be no further color development when excess Reagent No. 3 is added.

Read the number of ml titrated from the burette and refer to the chart below to determine the ISOQUEST HT concentration.

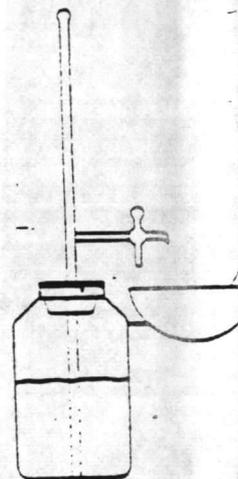




CHART FOR SLUDGE CONDITIONER 102

<u>Burette reading</u>	<u>(ppm) parts per million</u>	<u>Burette reading</u>	<u>(ppm) parts per million</u>
.5	13	3.8	178
.6	18	3.9	183
.7	23	4.0	188
.8	28	4.1	193
.9	33	— 4.2	198
1.0	38	4.3	203
1.1	43	4.4	208
1.2	48	4.5	213
1.3	53	4.6	218
1.4	58	4.7	223
1.5	63	4.8	228
1.6	68	4.9	233
1.7	73	5.0	238
1.8	78	5.1	243
1.9	83	5.2	248
2.0	88	5.3	253
2.1	93	5.4	258
2.2	98	5.5	263
2.3	103	5.6	268
2.4	108	5.7	273
2.5	113	5.8	278
2.6	118	5.9	283
2.7	123	6.0	288
2.8	128	6.1	293
2.9	133	— 6.2	298
3.0	138	6.3	303
3.1	143	6.4	308
3.2	148	6.5	313
3.3	153	6.6	318
3.4	158	6.7	323
3.5	163	6.8	328
3.6	168	6.9	333
3.7	173	7.0	338

Range

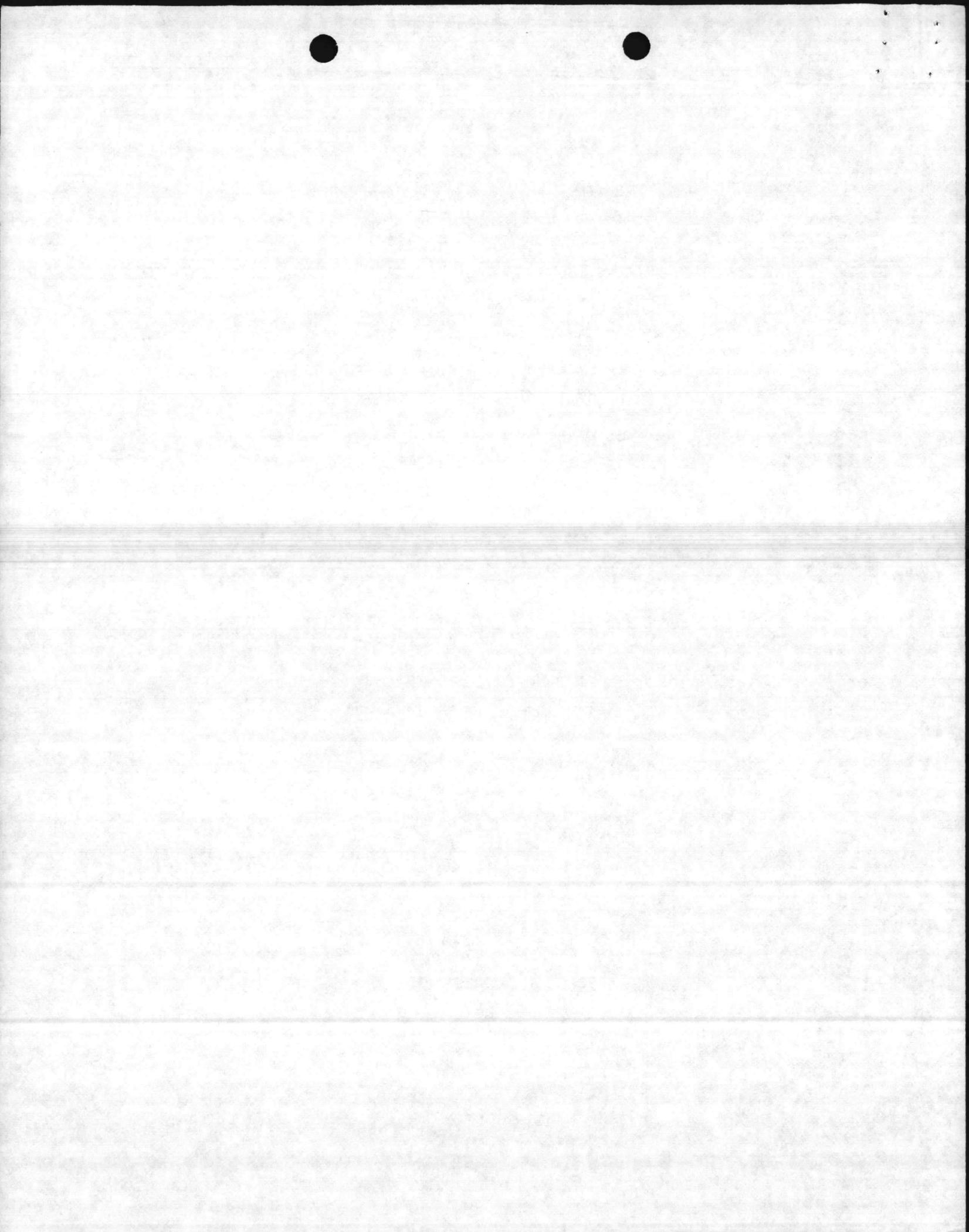
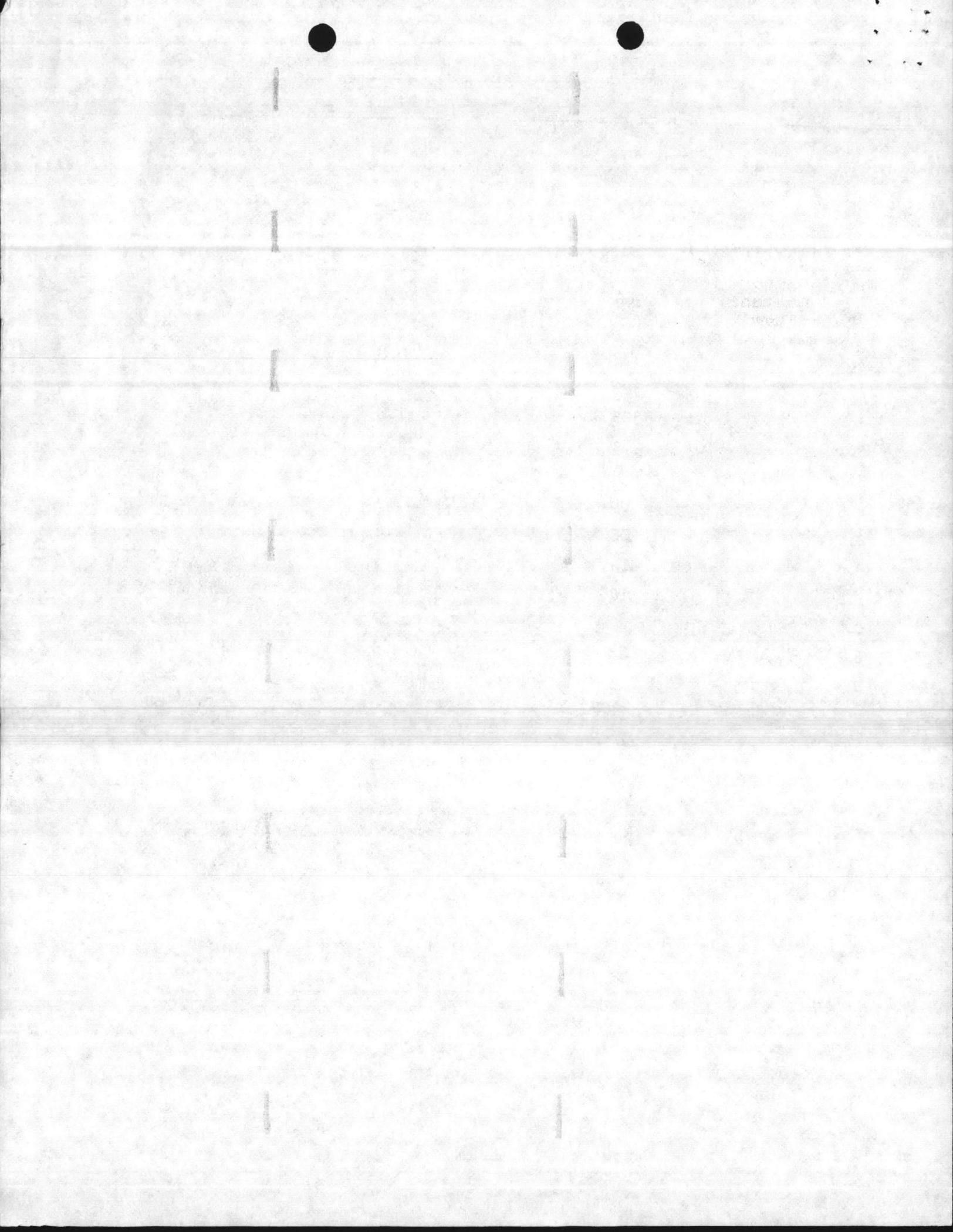


CHART FOR SLUDGE CONDITIONER 705 (High Range)

<u>Burette reading</u>	<u>(ppm) parts per million</u>	<u>Burette reading</u>	<u>(ppm) parts per million</u>
7.1	343	10.1	493
7.2	348	10.2	498
7.3	353	10.3	503
7.4	358	10.4	508
7.5	363	10.5	513
7.6	368	10.6	518
7.7	373	10.7	523
7.8	378	10.8	528
7.9	383	10.9	533
8.0	388	11.0	538
8.1	393	11.1	543
8.2	398	11.2	548
8.3	403	11.3	553
8.4	408	11.4	558
8.5	413	11.5	563
8.6	418	11.6	568
8.7	423	11.7	573
8.8	428	11.8	578
8.9	433	11.9	583
9.0	438	12.0	588
9.1	443	12.1	593
9.2	448	12.2	598
9.3	453	12.3	603
9.4	458	12.4	608
9.5	463	12.5	613
9.6	468		
9.7	473		
9.8	478		
9.9	483		
10.0	488		





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

6288
NREAD
21 Jul 87

Mr. Paul Wilms, Director
Division of Environmental Management
NC Department of Natural Resources
and Community Development
Post Office Box 27687
Raleigh, North Carolina 27611

Dear Sir:

In accordance with requirements of the National Pollutant Discharge Elimination System (NPDES) Permit Number NC0003239, two copies of Discharge Monitoring Reports (DMRs) for the month of May 1987 are submitted.

The Hadnot Point Wastewater Treatment Plant did not meet the weekly minimum average for Dissolved Oxygen of 5.0 mg/l. The weekly average for 1-6 June 1987 was 4.0 mg/l. The return filter effluent pumps to the trickling filters were determined to have a reduced capacity. A new pump was placed in operation on 9 June 1987 and the plant met the monthly minimum average for dissolved oxygen.

Questions regarding this report should be forwarded to Ms. Elizabeth Betz, Supervisory Chemist, Natural Resources and Environmental Affairs Division, Assistant Chief of Staff, Facilities at (919) 451-5977.

Sincerely,

J. I. WOOTEN
Director, Natural Resources Division
By direction of the Commanding General

Encls:

(1) DEM Forms MR-1, MR-2 & MR-3 (2 copies)

Copy to:
EPA Region IV
CMDR, LANTNAVFACENCOM
NEESA

JOINT MESSAGEFORM

SECURITY CLASSIFICATION

UNCLASSIFIED

PAGE 01 OF 03	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO	UUUU			2111450

BOOK MESSAGE HANDLING INSTRUCTIONS

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

UNCLAS //NO11015//

SUBJ: USE OF ONSLOW BEACH

- A. COASTAL ZONE MANAGEMENT ACT
- B. TRNG SOP B0 P11102.1
- C. B0 11017.1B

1. THE BEACH IS A VERY FRAGILE ECOLOGICAL SYSTEM WHICH IS HEAVILY USED BY THE CAMP LEJEUNE COMMUNITY FOR BOTH RECREATION AND MILITARY TRAINING. IT IS IMPERATIVE THE BEACH AND ASSOCIATED DUNE SYSTEM BE PROTECTED FROM FURTHER DETERIORATION SO IT WILL BE AVAILABLE FOR FUTURE GENERATIONS OF MARINES TO TRAIN.

DISTR: |NREA|BFAC|BSJA|BCOS|BSDO|CEOA|OICB|GSTF|SSTF|OCDR

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE
J. Wooten
 J. WOOTEN, GS-12, DIR, NREA, 5003

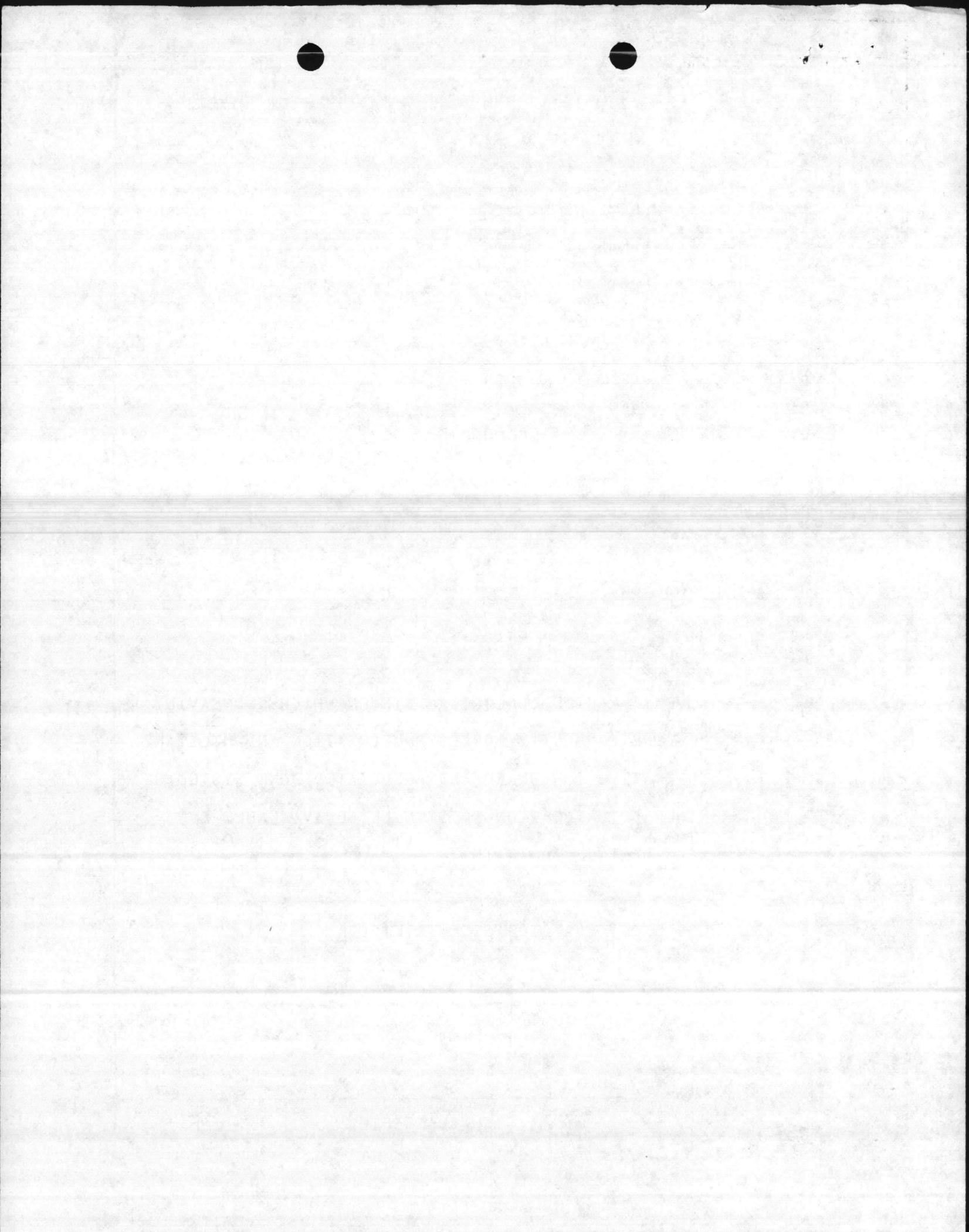
SPECIAL INSTRUCTIONS

RELEASER TYPED NAME, TITLE, OFFICE SYMBOL AND PHONE
 T J DALZELL, AC/S FAC, 3034

SIGNATURE

SECURITY CLASSIFICATION
 UNCLASSIFIED

DATE TIME GROUP



JOINT MESSAGEFORM

SECURITY CLASSIFICATION

UNCLASSIFIED

PAGE	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO	UUUU			
X 02 OF 03				RR					
BOOK	MESSAGE HANDLING INSTRUCTIONS								

2. CONSISTENT ^{FROM} WITH REF {A}, MCB CONSTRUCTED SEVERAL SAND DUNE CROSS-WALKS AT ONSLOW BEACH IN AN EFFORT TO REDUCE DAMAGE TO VEGETATION AND THE SAND DUNES BY FOOT TRAFFIC. PEDESTRIANS DESIRING TO VISIT ONSLOW BEACH ARE ENCOURAGED TO USE THE CROSSWALKS RATHER THAN WALK ACROSS THE DUNES.

3. REF {B} ESTABLISHES POLICY AND PROVIDES GUIDANCE FOR MILITARY TRAINING ACTIVITIES ON ONSLOW BEACH.

4. REF {C} ESTABLISHES POLICY AND PROVIDES GUIDANCES FOR OPERATING OFF ROAD RECREATIONAL VEHICLES {ORRVs} ON ONSLOW BEACH AND ATTENTION IS CALLED TO THE FOLLOWING INFORMATION FROM REF {C}.

A. THE AREA NORTH AND NORTHEAST OF THE NORTH TOWER IS AN IMPACT AREA AND OFF LIMITS TO ALL PERSONNEL.

B. THE AREA BETWN THE NORTH TOWER AND RISELEY PIER IS USED AS BOTH A RECREATION AND TRAINING AREA. PRIVATELY-OWNED VEHICLES OF ANY TYPE ARE PROHIBITED IN THIS AREA EXCEPT ON THE ROAD AND IN DESIGNATED PARKING AREAS.

C. THE AREA SOUTHWEST FROM RISELEY PIER TO THE NEW RIVER INLET IS PRIMARILY A TRAINING AREA, BUT SALTWATER FISHING IS PERMITTED WHEN NO TRAINING IS IN PROGRESS.

DISTR

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE		SPECIAL INSTRUCTIONS	
RELEASER	TYPED NAME, TITLE, OFFICE SYMBOL AND PHONE	SECURITY CLASSIFICATION UNCLASSIFIED	DATE TIME GROUP
	SIGNATURE		

JOINT MESSAGEFORM

SECURITY CLASSIFICATION

UNCLASSIFIED

PAGE 03 OF 03	DTG/RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO	UUUU			2111450
BOOK	MESSAGE HANDLING INSTRUCTIONS								

{1} FROMLY REGISTERED FOUR-WHEEL DRIVE VEHICLES ARE PERMITTED PAST RISELEY PIER.

{2} FISHERMEN ARE PERMITTED TO TRAVEL IN REGISTERED FOUR-WHEEL DRIVE VEHICLES ON THE BEACH STRAND BETWEEN THE WATER'S EDGE AND THE SEAWARD SIDE OF THE DUNES, IF NECESSARY FOR ACCESS TO FISHING AREAS {EXCEPT AS RESTRICTED BY PARA {3} BELOW}. ACCESS POINTS FOR THE STRAND ARE AT RISELEY PIER AND THE SOUTH TOWER. VEHICLES ARE NOT PERMITTED TO CROSS OVER THE DUNES AT ANY OTHER POINT.

{3} FROM JUNE THROUGH OCTOBER, TRAVEL ON THE STRAND IS RESTRICTED TO THE HOURS OF DAYLIGHT FOR THE PROTECTION OF NESTING ATLANTIC LOGGERHEAD AND GREEN SEA TURTLES, ■ THREATENED SPECIES.

5. THERE IS EVIDENCE REFS {B} AND {C} ARE BEING ABUSED BY OPERATORS OF BOTH PRIVATELY OWNED OFF-ROAD RECREATIONAL VEHICLES {ORRVs} AND GOVERNMENT OWNED VEHICLES INCLUDING ALL TERRAIN VEHICLES. ALL PERSONNEL USING ONSLOW BEACH SHOULD BECOME FAMILIAR WITH APPLICABLE BASE REGULATIONS AS SAME ARE BEING ENFORCED BY BASE PMO. IT IS REQUESTED COMMANDING OFFICERS AND SUPERVISORS ADVISE SUBORDINATE PERSONNEL OF CONTENTS OF THIS MSG.

6. POC IN THIS MATTER IS MR. JULIAN WOOTEN, DIR, NREA, X2083.

DISTR:

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

SPECIAL INSTRUCTIONS

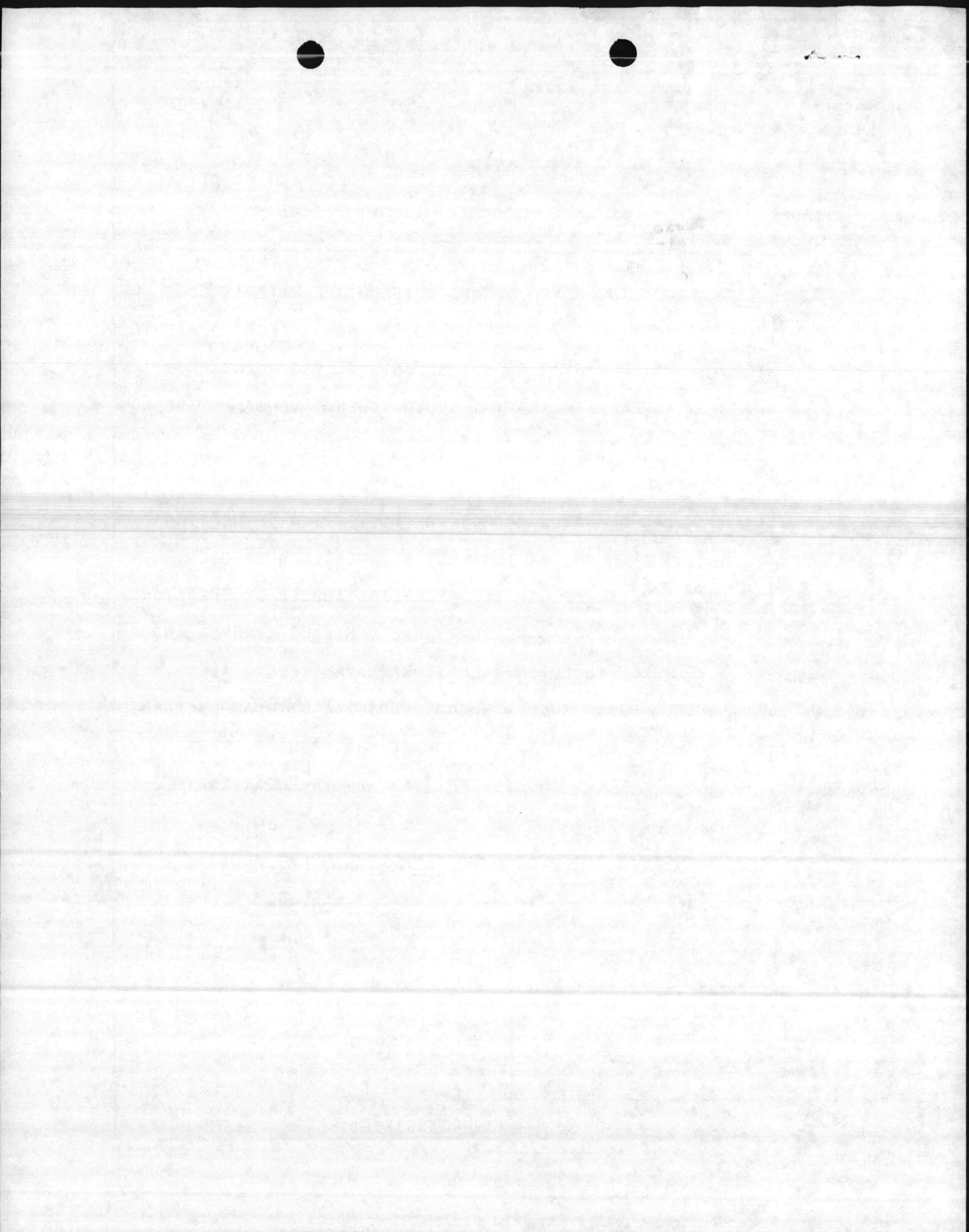
TYPED NAME, TITLE, OFFICE SYMBOL AND PHONE

RELEASER SIGNATURE

SECURITY CLASSIFICATION

UNCLASSIFIED

DATE TIME GROUP



6280
NREAD
12 Aug 87

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

Subj: ENVIRONMENTAL ASSESSMENT FOR WIDENING OF NC HIGHWAY 24

Ref: (a) AC/S FAC memo 6280/1 FAC of 10 Aug 87

1. In accordance with the reference, the subject environmental assessment provided therewith has been reviewed. It is recommended the need for a sidewalk/bicycle path across North East Creek which was addressed but ruled against be reconsidered. See page 5, paragraph 10.

JULIAN I. WOOTEN

1950
MAY 12
1950

Chief Director, Internal Revenue and Taxation
Civil Service Commission
Washington, D. C.

Dear Sir:

I am sorry to hear that the subject of your application for promotion to the position of Chief of the Division of Taxation is still pending. I am sure that you will be promoted to this position as soon as possible.

Sincerely,
[Signature]

5200
NREAD
22 Jul 87

From: Director, Natural Resources and Environmental Affairs
Division, Marine Corps Base, Camp Lejeune
To: Purchasing and Contracting Officer, Marine Corps Base,
Camp Lejeune, (Attn: Mr. Ken Silence)
Via: Base Maintenance Officer, Marine Corps Base, Camp Lejeune
Subj: PROPOSED SOLICITATION FOR CHEMICAL (PORTABLE) TOILETS
FOR CAMP LEJEUNE
Ref: (a) FONECON btwn Ken Silence/Peggy Brydon, P&C, and
Danny Sharpe, NREAD of 21 Jul 87
Encl: (1) NC DHS memo (Steve SteinBeck) dtd 30 Jun 87

1. This memo is in response to the reference. Based on the enclosure and telephone conversations with Mr. Cameron Lanier, Environmental Health Supervisor, Onslow County Health Department, and Mr. Mack Davis, Utilities Branch, Base Maintenance Department, the following wording for the subject solicitation is recommended:

"The toilets shall be maintained in a sanitary manner with the human wastes treated and disposed of at either the Hadnot Point or Camp Geiger Sewage Treatment Plants at a point designed by the Sewage Treatment Plant Operator.

J. I. WOOTEN

Blalock



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

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

Ronald H. Levine, M.D., M.P.H.
State Health Director
919-733-2895

June 30, 1987

MEMORANDUM:

TO: Local Health Directors
ATTENTION: Public Health Sanitarians
FROM: Steve J. Steinbeck, Supervisor
On-Site Sewage Program
Sanitation Branch
Environmental Health Section

SUBJECT: HB-1272, Ratified--Chemical (Portable) Toilet Included in "Sanitary Sewage System" Definition [G.S. 130A-334(11)]

Attached is a copy of House Bill 1272 which was ratified and became effective June 19, 1987. This act amends the definition for "Sanitary Sewage Systems" in G.S. 130A-334(11) by adding a new sentence which provides that chemical (portable) toilets are to be considered a sanitary sewage system when they are properly managed and collect only human waste for mass gatherings, construction sites, and labor work camps.

"Properly managed," as interpreted by rules, means the toilets are maintained in a sanitary manner with the collected human wastes treated and disposed into either an approved ground absorption system or approved public or community sewage system. "Labor work camps" has been interpreted to include migrant labor camps and railroad worker camps.

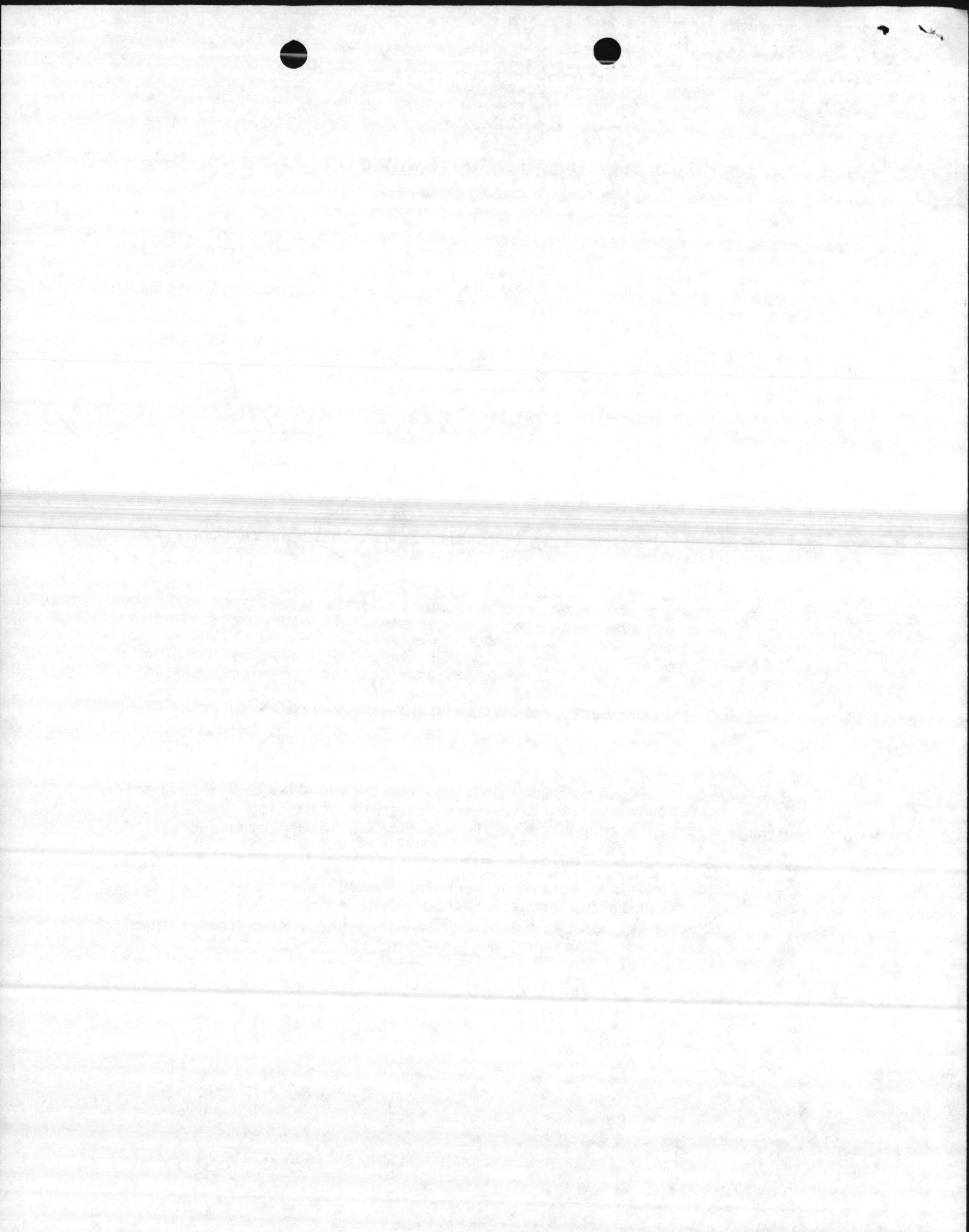
Since chemical (portable) toilets are to be used for the collection of human feces and urine, the other wastes associated with bathing, laundering, food preparation, and cleaning shall be discharged into a sanitary sewage system other than a chemical (portable) toilet as provided by current laws and rules.

If you have any questions or if we may assist further in the application of this law, contact us at the address or telephone number listed above.

SJS/gb

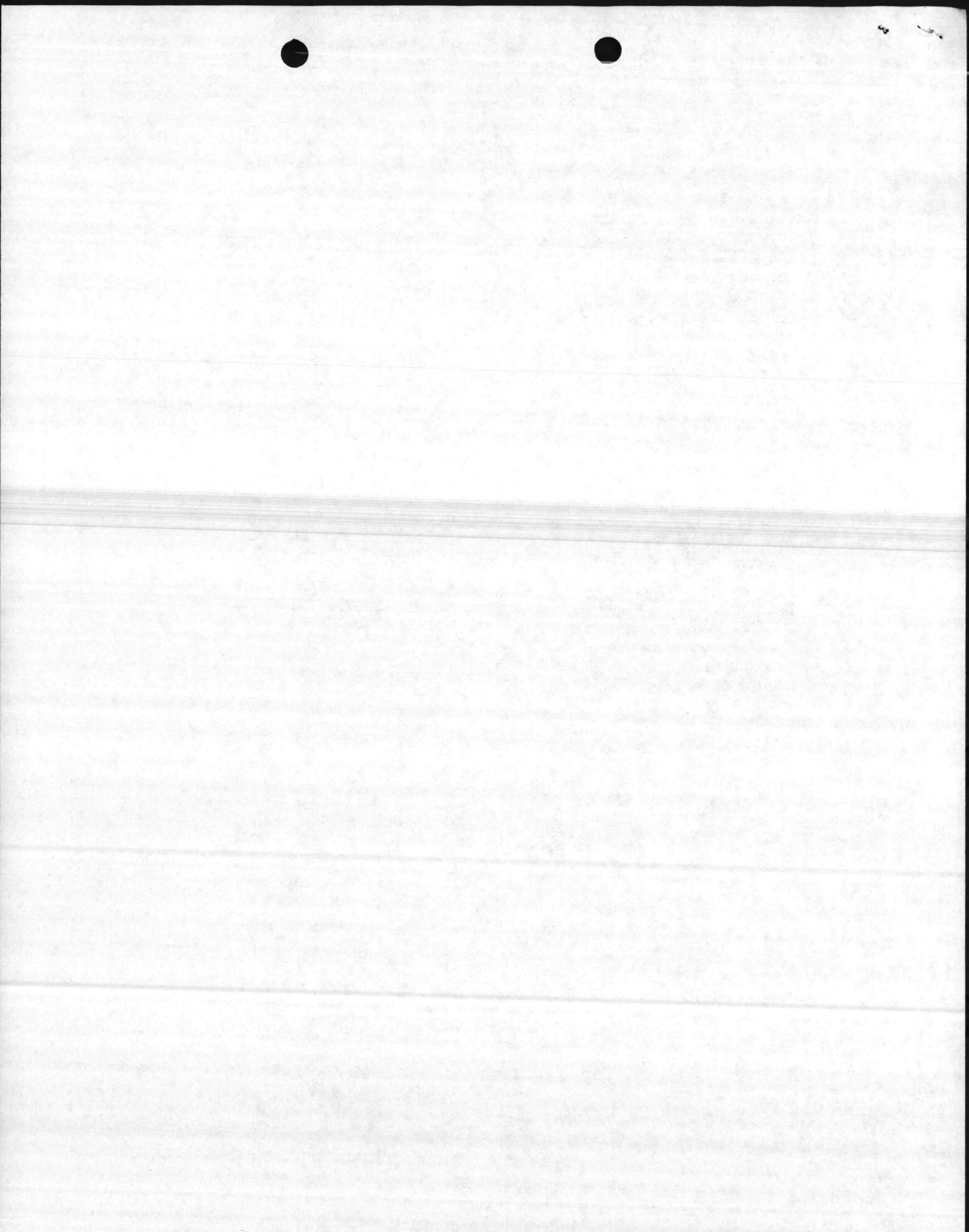
Attachment

Enclosure (1)



Local Health Directors (Cont.)
HB-1272, Ratified--Chemical (Portable) Toilet Included in "Sanitary Sewage System"
Definition [G.S. 130A-334(11)]
Page 2
June 30, 1987

cc: Mr. Marty Allen
Mr. John Barkley
Mr. Richard Baxley
Professor Joe Beck
Mr. Charles G. Boyette
Ms. Harriett Campbell
Dr. Trenton G. Davis
Mr. Robert Everett
Mr. Robert W. Farris
Ms. Paula Gupton
Mr. Mike Herring
Mr. Chris Hoke
Dr. Mike Hoover
Mr. Charles Jeffress
Ms. Cindy Kinsland
Y. J. Lao, Ph.D.
Dr. Ronald H. Levine
Mr. Gayl Manthei
Mr. Jerry Parks
Dr. Joe Phillips
Mr. W. E. Pierce
Ms. Julia Renfrow
Ms. Linda Sewall
Mr. Robert Smith
Mr. James F. Stamey
Mr. James Stewart
Mr. Tom Stich
Mr. Paul Wilms
All Sanitation Branch Staff
Branch Heads (Environmental Health Section)



GENERAL ASSEMBLY OF NORTH CAROLINA
1987 SESSION
RATIFIED BILL

CHAPTER 435
HOUSE BILL 1272

AN ACT TO CLARIFY THE LAW REGARDING SANITARY SEWAGE SYSTEM
LAW AND CHEMICAL TOILETS.

The General Assembly of North Carolina enacts:

Section 1. G.S. 130A-334(11) reads as rewritten:

"(11) 'Sanitary sewage system' means a complete system of sewage collection, treatment and disposal including approved privies, septic tank systems, connection to public or community sewage systems, sewage reuse or recycle systems, mechanical or biological treatment systems, or other such systems.

Properly managed chemical toilets used only for human waste at mass gatherings, construction sites and labor work camps are considered sanitary sewage systems."

Sec. 2. This act is effective upon ratification.

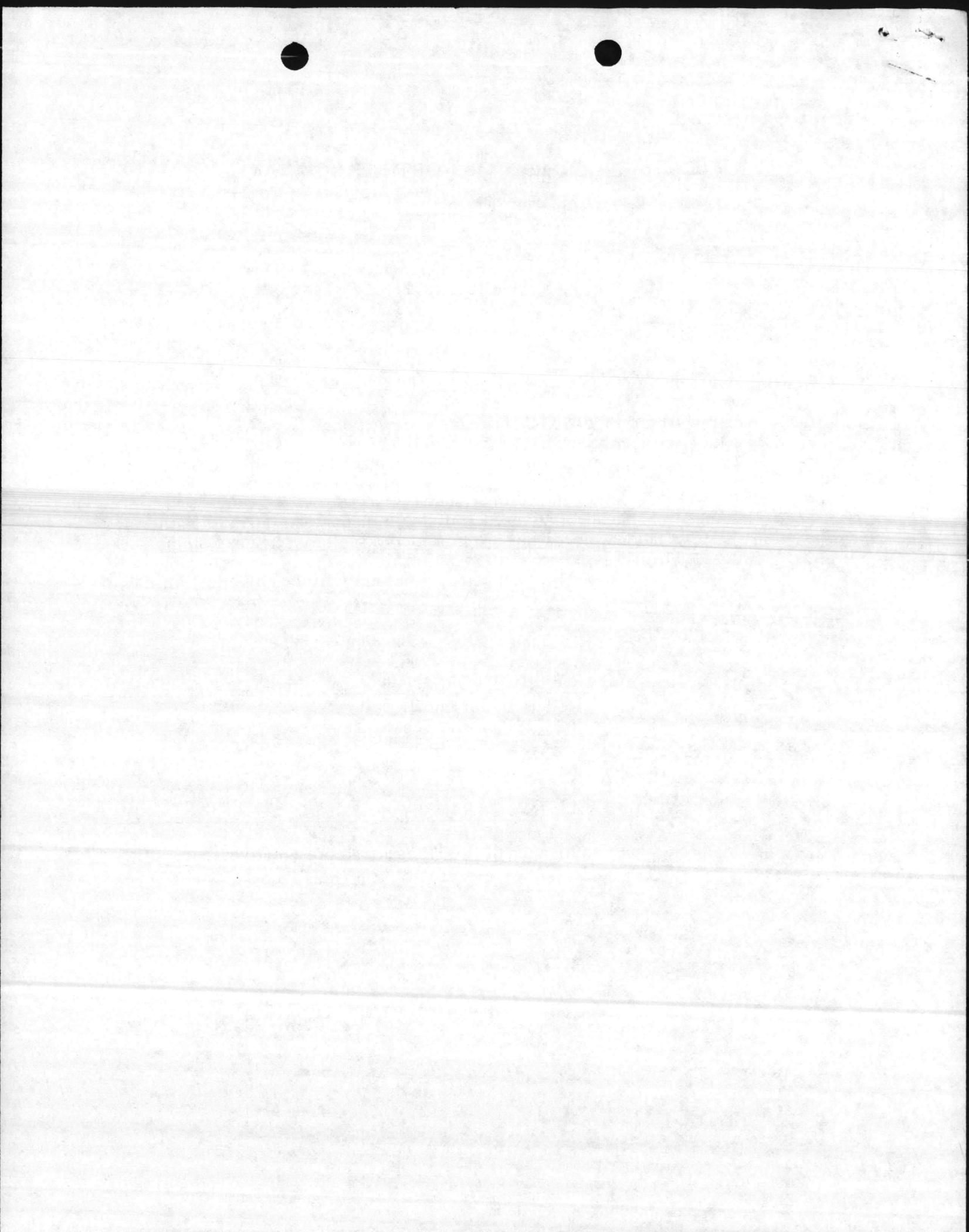
In the General Assembly read three times and ratified this the 19th day of June, 1987.

ROBERT B. JORDAN III

Robert B. Jordan III
President of the Senate

LISTON B. RAMSEY

Liston B. Ramsey
Speaker of the House of Representatives





Chemical Toilets

State of North Carolina
Department of Justice

LACY H. THORNBURG
ATTORNEY GENERAL

P.O. BOX 629
RALEIGH
27602-0629

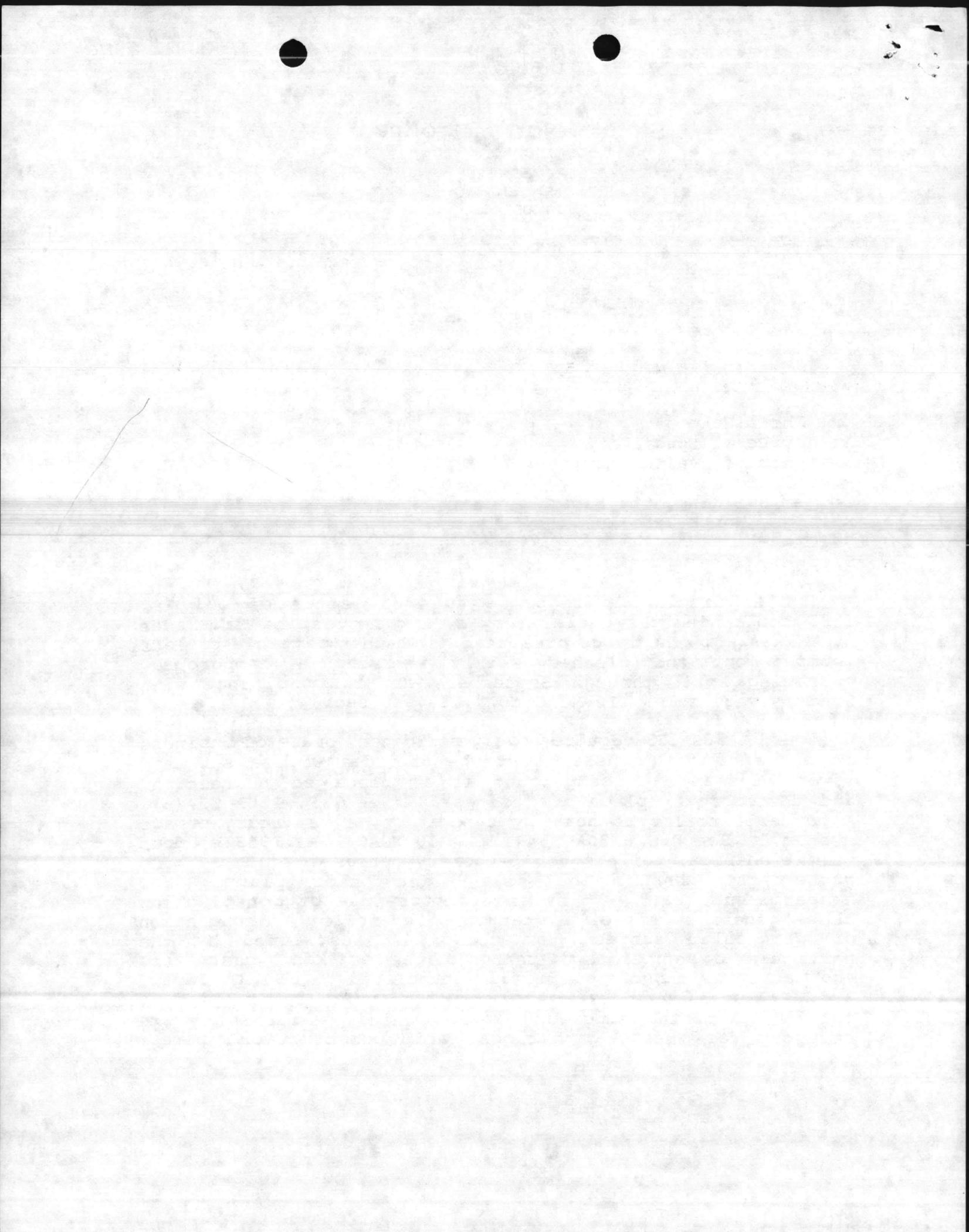
July 19, 1985

Mr. Chris Hoke
Agency Legal Specialist
Division of Health Services
Post Office Box 2091
Cooper Building, 6th Floor
Raleigh, North Carolina

Dear Mr. Hoke:

I am writing in response to your letter of July 9, 1985 concerning the declaratory ruling request by Mr. James A. Valkema. The issue presented is whether portable toilets (pumped out and cleaned weekly) serving a campground, operating April through September, are in compliance with State sewage rules (10 NCAC 10A .1934 et seq.)

G.S. 130A-335 requires every residence, place of business or place of public assembly to be provided with a sanitary sewage system. A campground is a "place of recreation" and therefore a "place of business." See G.S. 130A-334(6). A portable toilet is not, by definition, a "sanitary sewage system." See G.S. 130A-334(11). 10 NCAC 10A .1958(e) does permit chemical toilets for temporary purposes, such as mass gatherings, construction sites, and other places "for nonpermanent use." It is an accepted rule of construction that "general words of a statute which follow a designation of particular subjects or things be restricted by the particular designations to things of the same kind, character, and nature as those specifically enumerated." 12 N.C. Index, 3rd, Statutes, s. 5.12. Applying this rule, it is apparent that a six-month campground does not fall within the same category as mass gatherings and construction sites.



Mr. Chris Hoke

Page 2

July 19, 1985

Therefore, 10 NCAC 10A .1958(e) is inapplicable and the definition of "sanitary sewage system", which does not permit portable toilets, controls.¹

Therefore, the Sanitation Branch respectfully requests the hearing officer to declare that portable toilets (pumped out and cleaned weekly) are not an authorized sanitary sewage system to serve a campground operating April through September.

Very truly yours,

LACY H. THORNBURG
Attorney General

Robert R. Reilly

Robert R. Reilly
Assistant Attorney General

RRR:flf

cc: Mr. James A. Valkenaar
Mr. Clay S. Pennington

¹ An important distinction between the systems authorized as sanitary sewage systems and portable toilets is that the former provides treatment and the latter does not.



111

STATE OF NORTH CAROLINA
DIVISION OF HEALTH SERVICES
DECLARATORY RULING

IN RE: James A. Valkenaar, Sr.

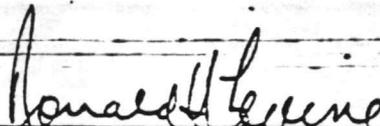
I, Ronald H. Levine, M.D., M.P.H., State Health Director, Division of Health Services, issue this declaratory ruling pursuant to G.S. 150A-17. This ruling will interpret the applicability of G.S. Chapter 130A, Article 11, and 10 NCAC 10A .1900 to the factual situation described in Petitioner's letter of July 3, 1985. It will be binding on this agency, but only interprets the statutes and rules in light of the particular facts of this case. I reserve the right for this agency to make a prospective change in the interpretation which is made in this ruling.

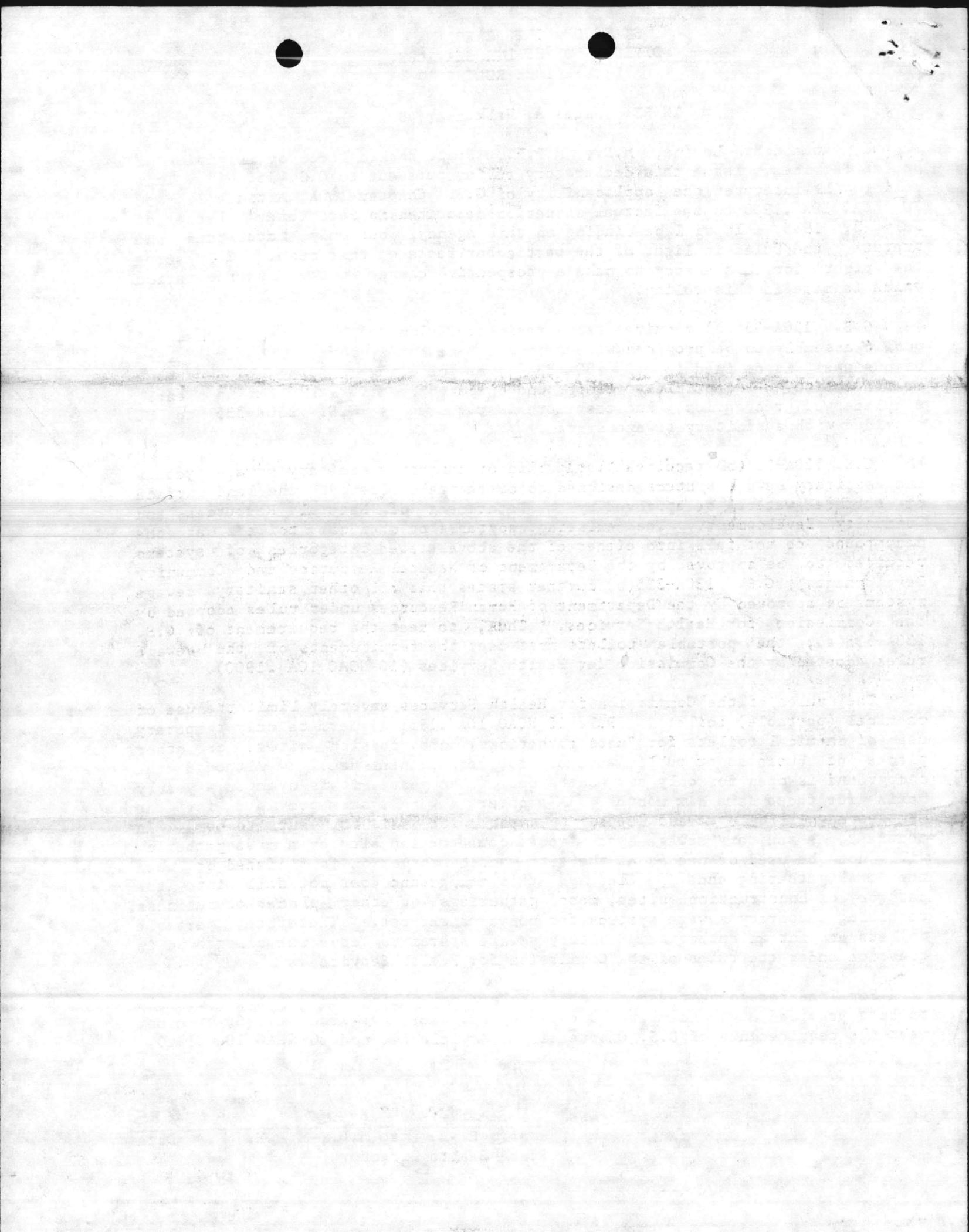
G.S. 130A-335(a) requires every residence, place of business, or place of public assembly to be provided with a sanitary sewage system. The term "place of business" is defined in G.S. 130A-334(6) as including a "place of amusement or recreation." The primitive campground operated by Mr. Valkenaar is clearly a place of recreation, and therefore is required by G.S. 130A-335 to be provided with a sanitary sewage system.

G.S. 130A-335(b) requires that public or community sanitary sewage systems and sanitary sewage systems designed to discharge effluent to the land surface or surface waters be approved by the Department of Natural Resources and Community Development. The existing portable or chemical toilets at the campground do not fall into either of the above stated categories of systems required to be approved by the Department of Natural Resources and Community Development. G.S. 130A-335(b) further states that all other sanitary sewage systems be approved by the Department of Human Resources under rules adopted by the Commission for Health Services. Thus, to meet the requirement of G.S. 130A-335(a), the portable toilets must meet the requirements of the sewage rules adopted by the Commission for Health Services (10 NCAC 10A .1900).

The rules of the Commission for Health Services severely limit the use of chemical (portable) toilets. Rule 10 NCAC 10A .1958(e) permits only temporary use of chemical toilets for "mass gatherings, construction sites, or other places of business or public assembly for nonpermanent use." Although the campground is open for only six months out of the year, it is open on a yearly basis for those same six months. A sanitary sewage system provided for the campground will be used and needed on a permanent basis for years to come. In contrast, a sanitary sewage system for a construction site or a mass gathering will not be used or needed at the site when construction is finished or when the mass gathering ends. Clearly, this campground does not fall into the category of construction sites, mass gatherings, or other places of business requiring temporary sewage systems for nonpermanent use. Therefore, portable toilets are not an authorized sanitary sewage system to serve the campground in question under the rules of the Commission for Health Services.

For the foregoing reasons, this declaratory ruling finds that portable toilets provided at the campground owned by Mr. James A. Valkenaar, Sr., do not meet the requirements of G.S. Chapter 130A, Article 11, and 10 NCAC 10A .1900.


Ronald H. Levine, M.D., M.P.H. 9/3/85
State Health Director Date



ROUTINE

311943Z JUL 87

1 CG MCB CAMP LEJEUNE NC//BLDG//

1 CG SECOND MARDIV//G-4//
1B CAMP LEJEUNE NC

CG SECOND FSSG//G-4//

1 CLAS //N05100//

SUBJ: DSSC INFORMATIONAL BULLETIN 12-87 (HAZARDOUS MATERIAL
INFORMATION SYSTEM (HMIS))

CFR SECTION 1910.1200

MCN 5100.25

CG MCBCL MSG 261914Z JUN 87

THE PURPOSE OF THIS BULLETIN IS TO PROVIDE INFO TO COMMANDERS/
SUPERVISORS IN OBTAINING MATERIAL SAFETY DATA SHEETS (MSDS). REF A
REQUIRES EMPLOYERS TO HAVE AVAILABLE IN THE WORKPLACE A MSDS FOR
EACH HAZARDOUS CHEMICAL WHICH THE EMPLOYEE COMES IN CONTACT ON A
DAILY BASIS. AS DESCRIBED IN REF B PLA HAS RESPONSIBILITY OF
COLLECTING MSDS FOR SYSTEM ITEMS AND PUBLISHING THE DATA ON A HMIS
MICROFICHE (PCN 501 002 34000). UNIT REQUIREMENTS FOR THE
MICROFICHE MAY BE ORDERED THROUGH THE UNIT'S PUBLICATION CONTROL
CENTER.

PROCEDURES HAVE BEEN INITIATED ON LOCALLY PROCURED ITEMS TO
IDENTIFY HAZARDOUS MATERIAL IAW ENCL (1) OF REF B PRIOR TO
SUBMITTING THE REQUISITION TO P&C. P&C HAS BEEN REQUESTING VENDORS
TO PROVIDE A COPY OF THE MSDS AT THE TIME OF DELIVERY. REQUEST
UNITS SUBMIT A COPY OF MSDS FOR DSSC NON STOCKED ITEMS TO MCB
SAFETY OFFICER. IF MSDS ARE NOT PROVIDED AT TIME OF DELIVERY,
UNITS SHOULD SUBMIT A REQUEST IN WRITING TO P&C PROVIDING ITEM
DESCRIPTION, COMPANY, CONTRACT NUMBER AND DOC NUMBER.

THIS BULLETIN CANCELS REF C.

POC THIS ACTIVITY IS MR NORMAN, T & R BRANCH, DSSC, EXT 5163.

OG(2)...ORIG FOR CG MCB CAMP LEJEUNE(118) /13/
DSSC(1) CEQA(1) DICB(1) BSDD(1) BCDS(1) SSTF(85) GSTF(12) OADR(14)

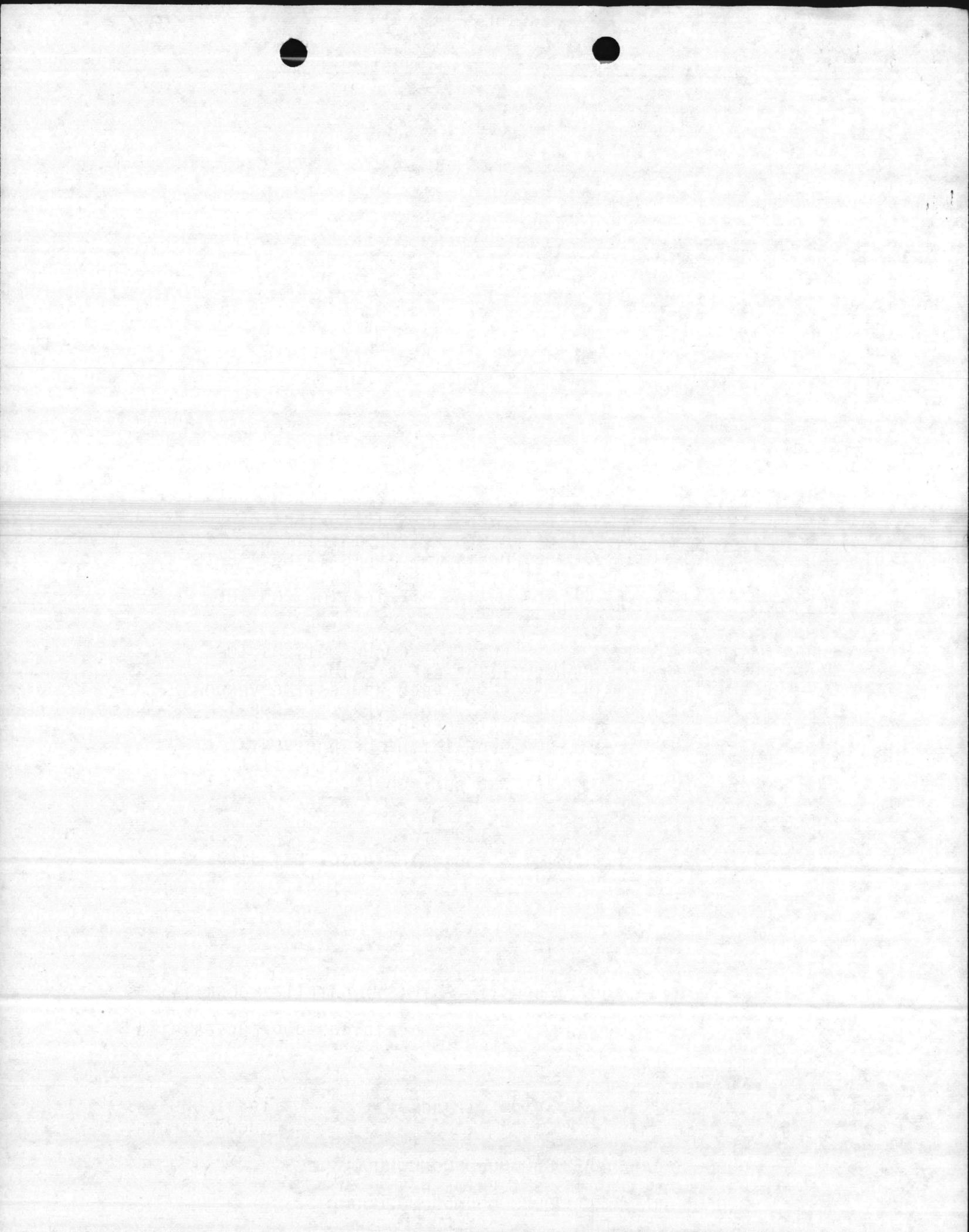
RTD:000-000/COPIES:0118

211183/212
IN:RXIA00074

1 OF 2

MATA0500 212/20:08Z

311943Z JUL 87
CG MCB CAMP LE



7P1109
Memorandum

11090
NREAD

DATE: 1 Oct 1986

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

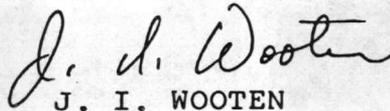
SUBJ: USED OIL MANAGEMENT PROGRAM

Ref: (a) BMO memo 6280 of 26 Aug 86
(b) BMO memo of 1 Oct 86

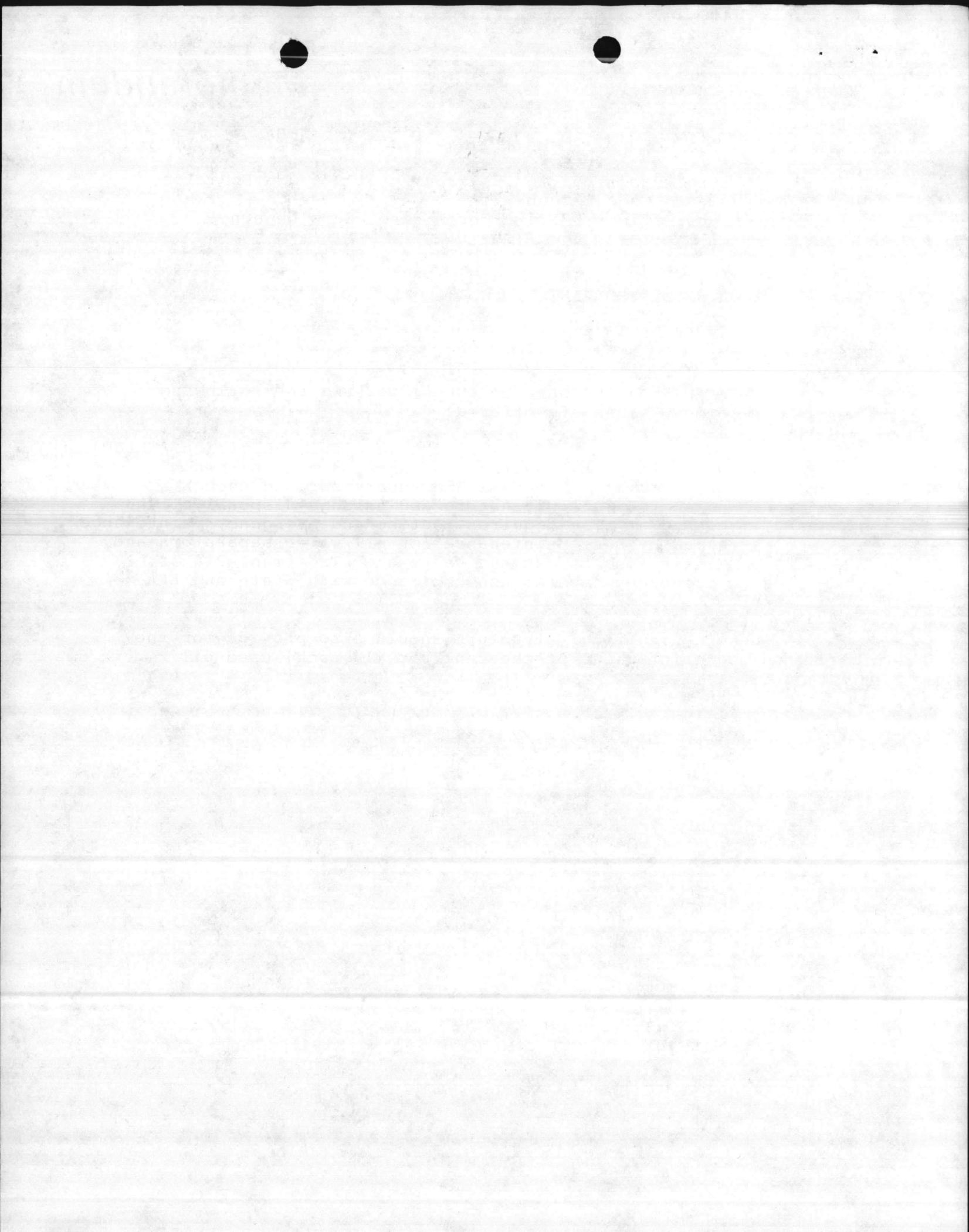
1. References (a) and (b) have been reviewed and the following comments/recommendations are offered:

a. Natural Resources and Environmental Affairs Division (NREAD) views the management of subject program as a Base Maintenance function that should be staffed with a supervisor and enough manpower to collect, transport, store and arrange disposal of the product. The program also requires routine and emergency maintenance support performed by Base Maintenance for oil water separators and collection point systems to ensure Wastewater Treatment Plants aren't damaged thereby causing noncompliance with State and EPA guidelines.

b. The organizational structure should also provide for the operation and maintenance of the central, (14 each) used oil storage facilities.


J. I. WOOTEN

Copy to:
AC/S FAC



Memorandum

6280
MAIN

DATE: 26 AUG 1986

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

TO: Director, Natural Resources & Environmental Affairs Division (NREAD), Marine Corps Base, Camp Lejeune

SUBJ: REVIEW OF IMPLEMENTATION REQUIREMENTS FOR USED OIL MANAGEMENT PLAN

Ref: (a) Advanced Copy of Implementation Requirements and Recommendations for Used Oil Management

1. Review of the enclosure yields the following comments and recommendations:

a. NREAD as Camp Lejeune's Hazardous Material/Hazardous Waste Management Office should become responsible for the operation and execution of the Used Oil Management Plan (UOMP). Accordingly, we recommend the transfer of associated personnel and equipment to NREAD 1 October 1986 for implementation of the recommended actions.

===

b. An alternative to the above is to establish a service contract for the execution of the used oil recovery with NREAD as the technical representative.

2. Until items 1a, 1b, or other alternatives are adopted, the organizational entity within Base Maintenance to administer and execute the program remains vested with Base Maintenance management. Accordingly, the recommendations addressed in the reference were considered and additional taskings for the Utilities Branch is not considered a viable solution at this time.

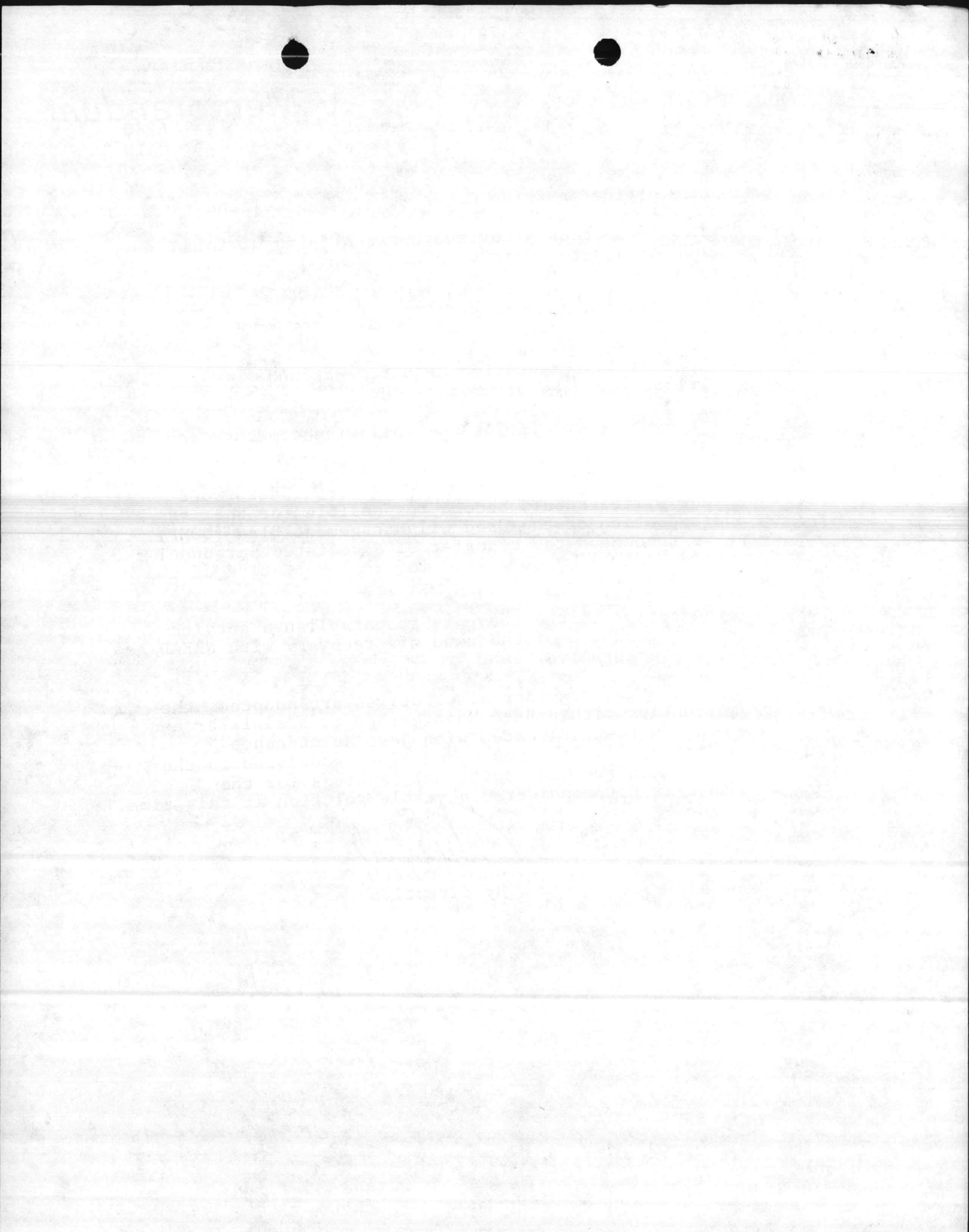
C. G. Powell
C. G. POWELL
By direction

*Julian
Doster*

Blind copy to:
AC/S, Facilities

AC/S Facilities ltr 6280/2 FAC of 23 July 86 pertains.

I am not able to proceed with review and comment on the Ensafe Used Oil Management Plan until the issues raised above are resolved. Suggest personal contact between you and Mr. Powell. Recommendations are unsound and totally inappropriate. *Danny Sturge*



Memorandum

6280/2

FAC

DATE: 23 JUL 1986

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

SUBJ: REVIEW OF HAZARDOUS MATERIAL/WASTE AND USED OIL STUDY

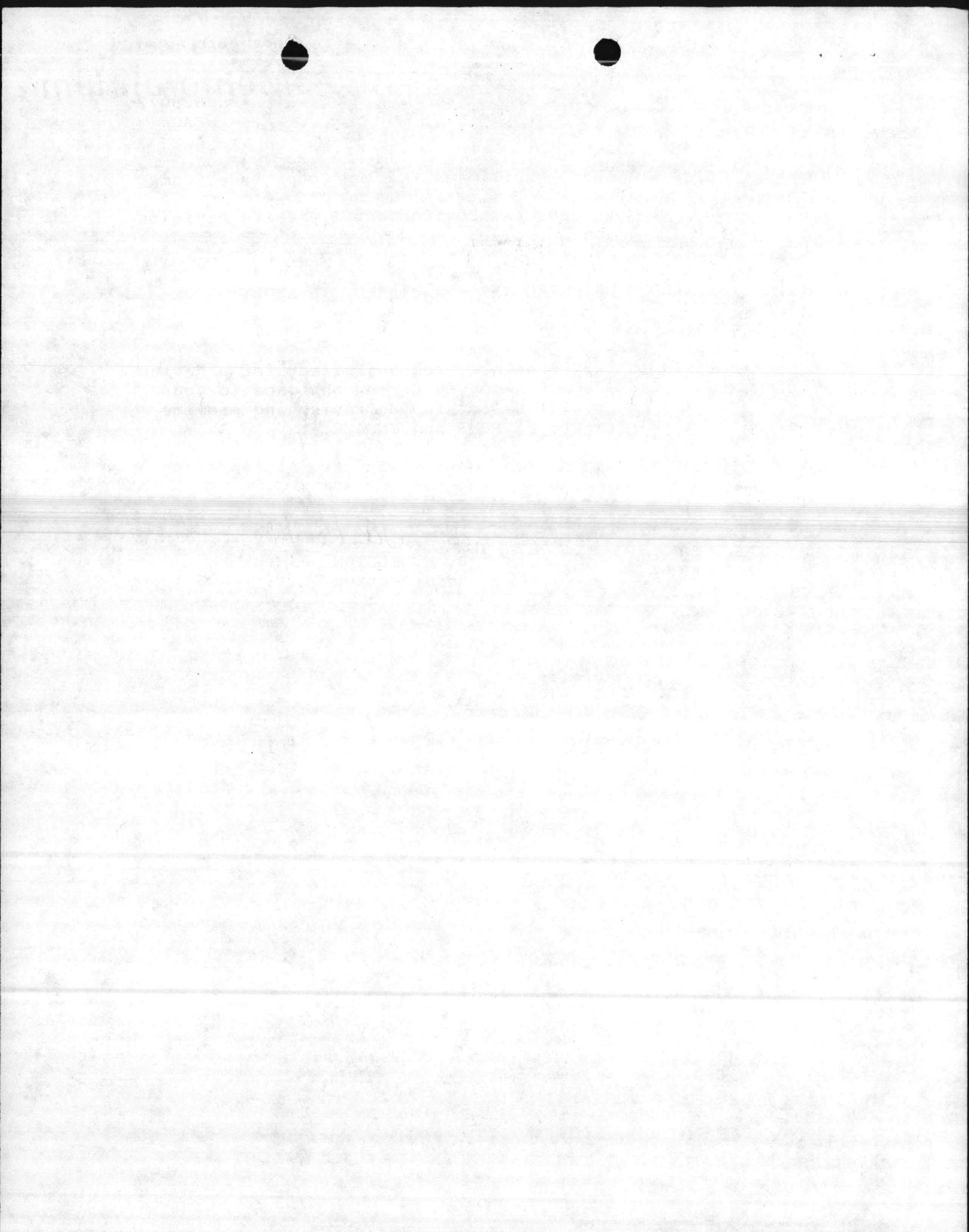
Ref: (a) Dir, NREAD memo dtd 11 Jul 86

1. As requested in the reference, responsibility for a review and comments on the subject study is hereby assigned to your office. Mr. Alexander will assist in the review and provide comments for forwarding to LANTDIV and ENSAFE.
2. Request you develop and coordinate with Mr. Alexander on a schedule for the review.



B. W. ELSTON
By direction

Copy to:
EnvEngr



NORTH CAROLINA STATE UNIVERSITY

7/20/87

Sent to
CPD for
Personnel
Folder tab

PRESENTS THIS CERTIFICATE TO



DANNY SHARPE



FOR PARTICIPATION IN

HAZARDOUS WASTE MANAGEMENT UNDER RCRA UPDATED

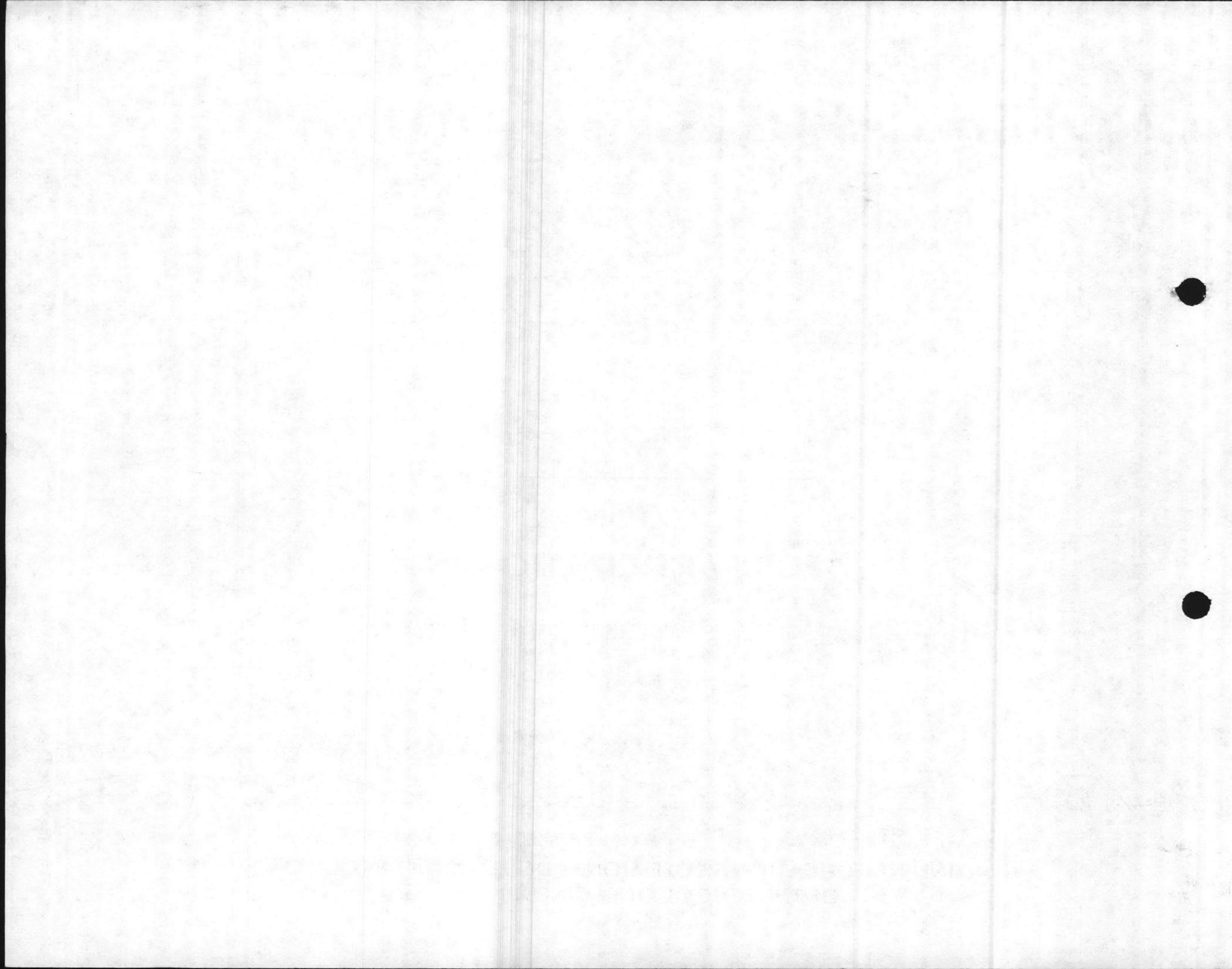
JULY 14-15, 1987

Gene A. Hutton
CHANCELLOR

W. L. Turner
VICE CHANCELLOR FOR EXTENSION AND PUBLIC SERVICE

J. K. Koh
INSTRUCTOR
Larry K. Minter
DEAN OF SCHOOL

A CONTINUING EDUCATION/PROFESSIONAL DEVELOPMENT PROGRAM
OF THE SCHOOL OF ENGINEERING



Memorandum

11345.4
MAIN

DATE: 15 July 1987

FROM: Utilities Systems General Foreman

TO: Director, Natural Resources and Environmental Affairs

VIA: Director, Utilities Branch *OB*

SUBJ: RESULTS OF WASTEWATER TREATMENT COMPLIANCE MONITORING

Ref: (a) Your ltr 6286/1 of 13 July 1987

1. Per the reference, the following data concerning violation of Dissolved Oxygen Permits Limits (Weekly) at the Hadnot Point Wastewater Plant is provided.

a. A new trickling filter return effluent pump was installed on 9 June 1987. Since the pump installation, the D.O. has averaged 5.6 mg/l.

2. If we could be of any further assistance, please contact us at your earliest convenience.

B. M. Frazelle, II
B. M. FRAZELLE, II

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

ROUTING - REQUEST

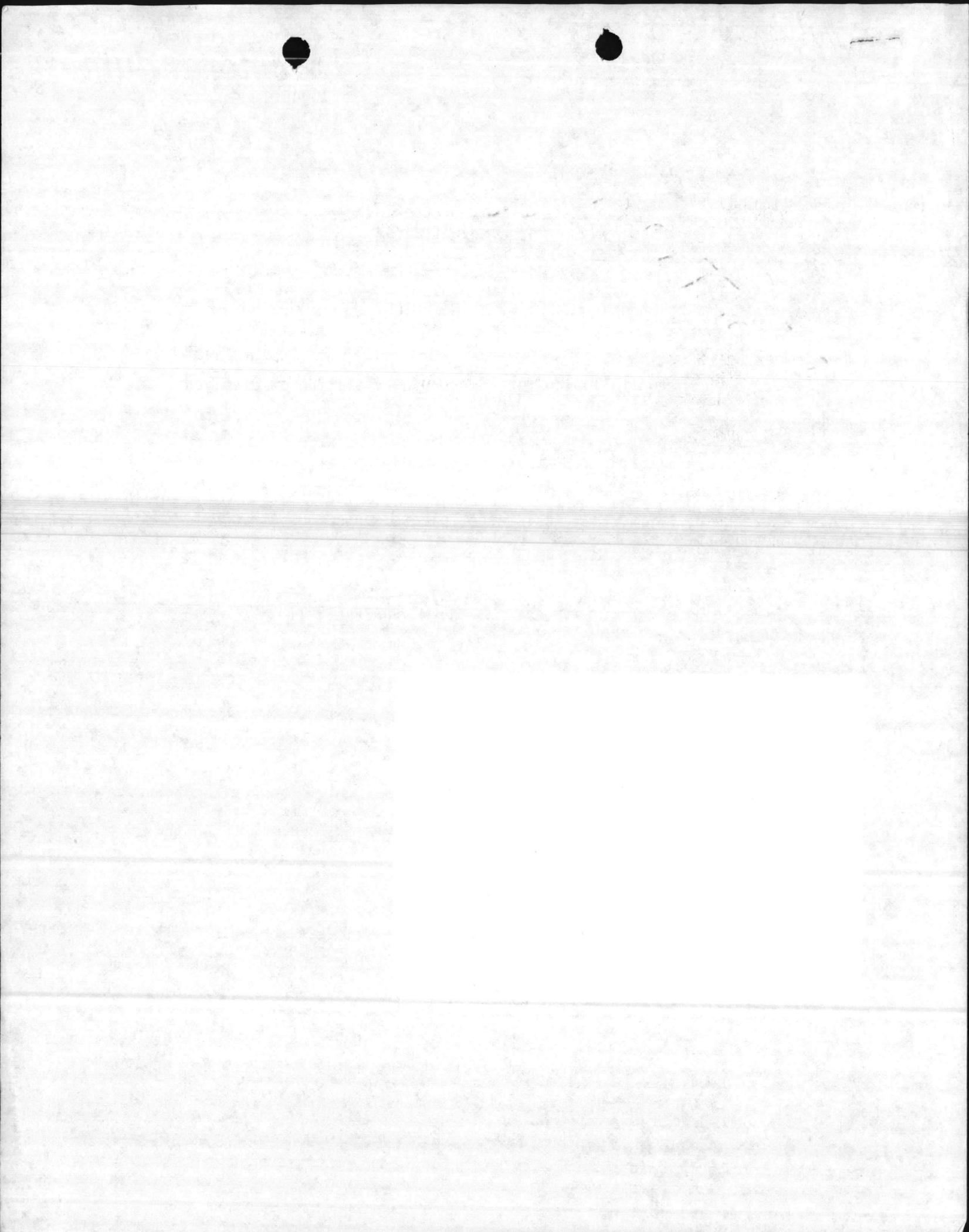
Please

- READ
 - HANDLE
 - APPROVE
- and
- FORWARD
 - RETURN
 - KEEP OR DISCARD
 - REVIEW WITH ME

Date _____

From _____

16 July
been sent
To *Has Copy to*
Betsy (?)
Julian



Memorandum

11345.4
MAIN

DATE: 15 July 1987

FROM: Utilities Systems General Foreman

TO: Director, Natural Resources and Environmental Affairs
via: Director, Utilities Branch *OB*

SUBJ: RESULTS OF WASTEWATER TREATMENT COMPLIANCE MONITORING

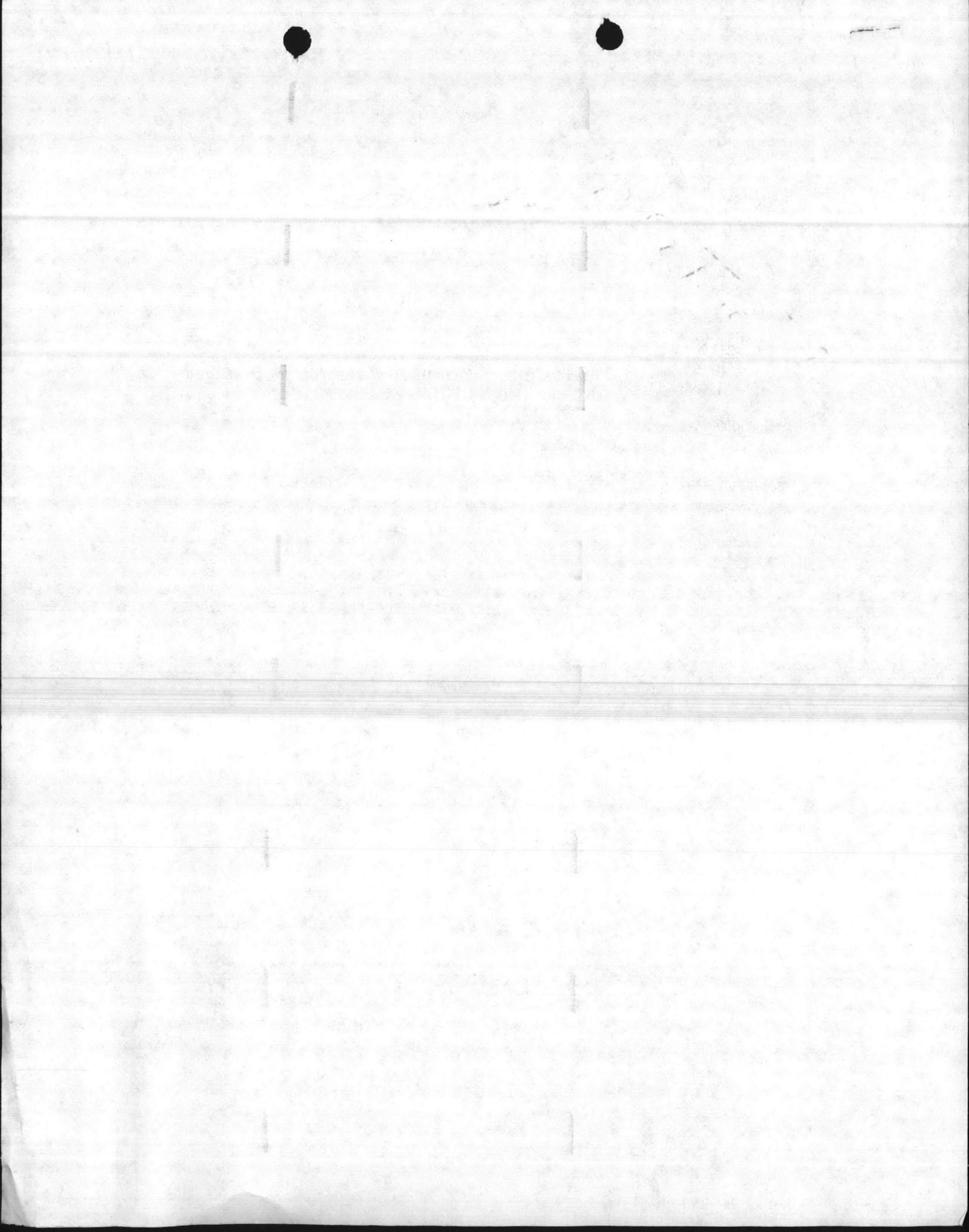
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B. M. FRAZELLE, II



NREAD

6240

NREAD

JUL 14 1987

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

Subj: MARINE CORPS USAGE OF CHLOROFLUOROCARBONS, CHLOROCARBONS,
AND HALONS

Ref: (a) CMC ltr 6280/3 LFL/2-787 of 8 May 87

Encl: (1) Quantitative Information needed on usage of Halons
(2) Quantitative Information Use of Potential OZONE
DEPLETERS (POD's) other than Halons

gla
Encl Control
Specialist
ste
Supp Ecologist

1. In response to the reference, enclosures (1) and (2) are provided.

2. Point of contact on this matter is Ms. Glene Smith, Natural Resources and Environmental Affairs Division, at Autovon 484-5003.

W/E

T. J. DALZELL
By direction

Writer/Typist Smith/Greene
Date Typed 14 Jul 87
Word Processor Number 6240

JUL 14 1987

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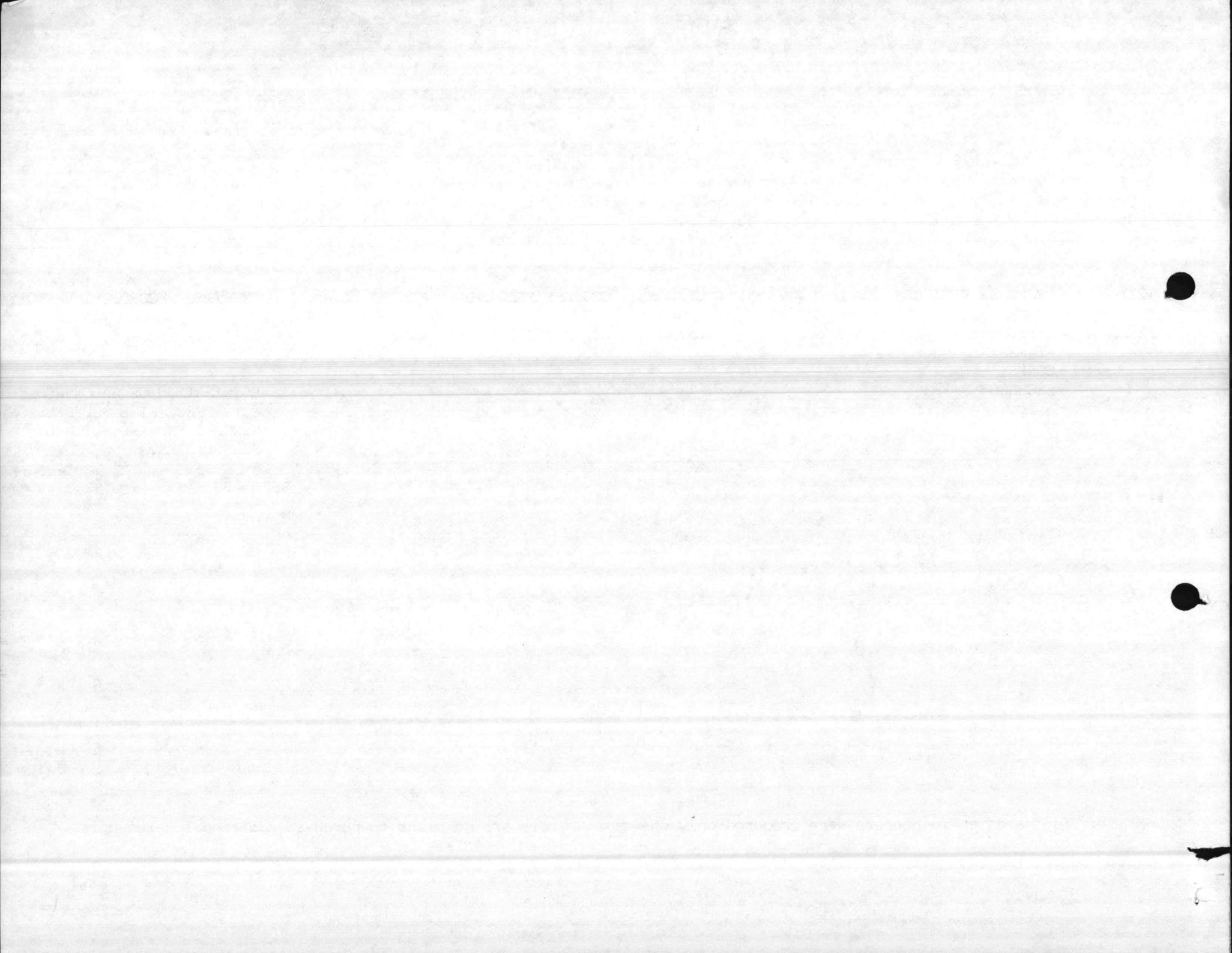
QUANTITATIVE INFORMATION NEEDED ON USAGE OF HALONS

Aggregate Quantities for Each Intended System/Use

Halon Type (1211 or 1301)	System/Use ¹	On Hand	Procured * Per Year	Emitted ² Per Year	Substitutes ³	Emission ⁴ Controls	Detection ⁵ System(s)	Remarks ⁶
1211	RESPONSE VEHICLES	200 lbs.		UNKNOWN	CO ₂ /DRY CHEMICALS	NONE		EXISTING RECORDS, INVENTORY
1211	COMPUTERS AT MARINE CORPS EXCHANGE	80 lbs.		UNKNOWN	CO ₂ /DRY CHEMICALS	NONE		EXISTING RECORDS, INVENTORY ELIMINATION OF HALON WOULD NOT AFFECT FIRE SUPPRESSION SINCE THERE ARE SUITABLE SUBSTITUTES.

COMMENT: The Halon extinguishers were procured only one time. There are no plans to purchase additional Halon units.

ENCLOSURE (11)



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

Estimated Quantity
(To the nearest 100 lb)

Chemical ^{1*}	Class ²	Use ³	On Hand ⁴	Procured Per Year	Consumed ⁵ (Destroyed) Per Year	Emitted ⁶ Per Year	Disposal ⁷ Per Year	Substitute ⁸	Remarks ⁹
1. Trichloro- methane, CCl ₃ F, Freon 11	CFC	REFRIGERANT	1400	6600	6600	UNKNOWN	NONE	UNKNOWN	EXISTING RECORDS
2. Dichloro- fluoromethane, CCl ₂ F ₂ Freon 12	CFC	REFRIGERANT	600	11,000	11,000	UNKNOWN	NONE	UNKNOWN	EXISTING RECORDS
3. Chlorodi- fluoromethane, CHClF ₂ Freon ² 22	CFC	REFRIGERANT	3500	10,000	10,000	UNKNOWN	NONE	UNKNOWN	EXISTING RECORDS
4. 1, 1, 2- trichloro- 1, 2, 3- trifluoro- ethane, CCl ₂ FCClF ₂ Freon 113	CFC	REFRIGERANT	NONE	500	500	UNKNOWN	NONE	UNKNOWN	EXISTING RECORDS
5. 1, 1, 1, trichloro- ethane, CH ₃ CCl ₃	CC	DEGREASER	1200	11,000	11,000	UNKNOWN	NONE	DRY CLEANING SOLVENT	EXISTING RECORDS

*COMMENT: Approximately 1000, 12 oz. spray cans of 1, 1, 1 Trichloroethane are used for cleaning precision instruments and electrical equipment.

ENCLOSURE (2)

