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6240 NREAD 23 Dec 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: WASTE OIL MANAGEMENT AND EQUIPMENT SUPPORT FOR FORESTRY/ WILDLIFE

Encl: (1) Deputy AC/S, FAC memo of 7 Dec 87 (2) Revised Action Brief

1. Enclosure (1) has been reviewed relative to both the Deputy, AC/S, Facilities, Action Brief and related Base Maintenance Officer, (BMO) comments. I concur with BMO comments that transfer of one billet will not support the actual needs of forestry and wildlife operations. Several man years are required for these operations and related soil conservation and wetlands protection. I recommend that heavy equipment functions remain within Base Maintenance Division.

2. Both the original action brief and related BMO comments, are much greater in scope than the AC/S, Facilities proposal. Changes involving maintenance of oil pollution abatement facilities and PCB transformer management are clearly Maintenance functions, requiring major support from almost all shops within Base Maintenance. There is some benefit from improving NREAD capabilities to respond to small spills, thereby eliminating coordination with and disruption of, Base Maintenance operations.

3. I non-concur with enclosure (1), and submit enclosure (2) for consideration.

J. I. WOOTEN

Crain Crain Charles

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HEADQUARTERS, MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA DATE /2-7-87 Deputy Date <u>12-7-87</u> From: Assistant Chief of Staff, Facilities To: <u>Natural Fearurces</u> Subj: Waste Orl Mgmt Jenny Attachedis ACISFR. proposal to transfer schi. foretrin. Bese Maintenence counter proposal 15 also attached. Request review comments/concurrent Teants Klate



CPNAV 5216/1444 (Rev. 8-81) S/N G1C7-LF-072-2320



DATE: 0 4 DEC 1987

628Ø MAIN

FROM: Base Maintenance Officer

TO: Assistant Chief of Staff, Facilities

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

ncl: (1) Draft Action Brief

(2) Proposed Enclosure to Draft Action Brief

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

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

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

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

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

M. G. LILLEY



HEADQUARTERS, MARINE CORPS BASE, CAMP LEJEUNE

ACTION BRIEF

Staff Section:

Date: NOV 2 0 1887

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

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

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

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

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



WASTE OIL MANAGEMENT AND FORESTRY/WILDLIFE HEAVY EQUIPMENT Subj: SUPPORT

Recommended Action:

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

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

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

B. W. ELSTON

Deputy, Assistant Chief of Staff, Facilities

NON-CONCUR

DATE

Recommendation:

BMO	#1 #2 #3	-	
MREAD	#1 #2 #3	 ariantia (h.	
AC/S, Comptroller: Recommendation	#3	_	

#1 #2 #3 CONCUR

APPROVED

DISAPPROVED

AC/S, Facilities



TRANSFER OF WASTE OIL MANAGEMENT FROM BMO TO NREAD

FUNCTIONS

Waste oil collection,

storage & disposition

RESOURCES

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

Maintenance of separators, including skimming, cleaning and inspection

Response to oil spills

Monitor oil storage tanks and monitoring wells

Burns pits for firefighter training -collect run off

PCB Transformer Program

Forestry/Wildlife heavy equipment support above. Will require heavy equipment support on large separators, such as Boat Basin, Courthouse Bay

Included in resources

Included in above except additional support would come from heavy equipment, etc.

No additional

No additional

1-Equipment Operator (FY-87 Records indicate 1.15 man years expended in forestry/ wildlife)

COMMENTS/RECOMMENDATIONS

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

Base Maintenance will provide necessary support

NREAD would assume lead role

NREAD would provide management and record keeping

Transfer one equipment operator from Base Maintenance



FUNCTIONS

RESOURCES

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

COMMENTS/RECOMMENDATIONS

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

Assign bldgs. 1102 and 1103 to NREA.

Transfer a billet from Base Maintenance

Parking/storage of vehicles and equipment

Space for personnel/ shop area

management

Budgeting/financial

1-Budget Clerk

Bldg. 1103 and 1102



TRANSFER OF WASTE OIL MANAGEMENT FROM BMO TO NREAD

NREAD

FUNCTION

RESOURCES

Waste oil collection

Maintenance of oilwater separators,

including skimming,

tion.

(r (r

cleaning and inspec-

1-Supervisor	1. Assume total man- 1	•
3-WG-7 Motor Veh Operators	agement and execution for a	n
2-Laborers	collection, storage, dis- 1	1
1-VacAll truck	posal and administration t	0
2-011 collection trucks	of waste oil. P	0
1-Oil skimming truck		
1-1200 gal relocatable	2. Request AC/S,	
tank for storage of	Comptroller to assign	
questionable material	NREAD as Program Ad-	
Storage tanks,	ministrator for Class II	
accessory buildings and	property.	
structures:		
S-888	3. Assign Program	
S-889	Supervisor from inhouse	
S-890	assets.	
S-891	14 M.	
STT-61		
STT-62		
STT-63		
STT-64		
STT-65		
S-781		
Accessory buildings	지 않는 것 같은 것 같은 것 같은 것 같이 있는 것 같이 없는 것 같이 없는 것이 없이 않이	
and structures assoc-		
iated with the above		
storage tanks		
2-Ail skimmers	1. Assume operational	1.
1-Air pump	support of all oil-water	
I AII pump	separators to include	2
	skimming, cleaning and	e
	inspection.	re
	2. Request assistance	
	from BMaint for heavy equip-	
	ment support on large	

separators such as Boat Basin,

Courthouse Bay.

MAINTENANCE

1. Transfer equipment and billets to establish 3 Vehicle Operator and 2 Laborer positions to NREAD.

. Transfer equipment.

2. Provide heavy equipment support as requested.



NREAD MAINTENANCE FUNCTION RESOURCES 1. Provide first response 1. Provide assistance Preloaded trailer loaded. Oil and hazardous for containment and cleanas requested. with 500 ft. of floating material spill up of spills. boom, matting, pom pom, response hand tools, drums : for hazardous material. 2. Request assistance absorbent, etc. for heavy equipment or labor for spills beyond own capability from Base Maintenance. No additional 1. Assume responsibility. 1. None. Administration of monitoring well program. 1. Assume responsibility. 1. None. Servicing containment No additional basins at Fire Protection Division burn pits used for fire P. Son P. St. at. fighter training Dedicated area in 1. Assign dedicated 1. Maintain inventory of Monitoring and all PBC transformers in use area in Lot 140 to Lot 140 disposing of PBC NREAD for temporary at CLNC. transformers

storage of PBC trans-

2. Notify NREAD of

change of "in use" P

transformers or PBC transformers held by

Base Maintenance.

formers awaiting

disposal.

2

2. Assume custody of PBC transformers from Base

Maintenance or from con-

3. Dispose of PBC transformers that are no longer

tractors that are taken

out of service.

required at CLNC.



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



HEADQUARTERS, MARINE CORPS BASE, CAMP LEJEUNE

Action Brief

Staff Section: Natural Resources and Environmental Affairs Division

Date: 23 December 1987

Problem: Hazardous Waste (HW) compliance issues and pollution abatement needs related to inadequate management of waste petroleum oils and lubricants (POL's).

Background/Discussion:

1. This action brief addresses the Assistant Chief of Staff, Facilities' decision to consolidate the collection and disposal of waste oil under the Director, Natural Resources and Environmental Affairs Division. The initial scope of the change was limited to the collection of waste oil from generating work sites, storage of oil awaiting disposal, disposal of oil, and related inspections, reports and other administrative tasks required by state and federal environmental regulations. Base Maintenance Officer has added several issues, including the cleaning and maintenance of oil pollution abatement facilities such as oil/water separators, and initial response to the Base Fire Chief requests for equipment and labor to contain and cleanup oil spills.

2. Waste POL's generally fall into the following seven categories:

- a. Waste crankcase oil and lubricants
- b. Hydraulic fluids
- c. Water contaminated JP-5, diesel and other fuels
- d. Spill residues collected in liquid form
- e. Skimming from oil water separators and other oil pollution abatement facilities.
- f. Miscellaneous petroleum distillates which do not meet definition of HW.
- g. Miscellaneous petroleum distillates and oils which are mixed with regulated solvents or other HW.

With several hundred sites generating waste POL's, controls to prevent unauthorized dumping of regulated HW into waste POL's are very difficult to administer. Once used POL's are mixed together in drums or tanks, the appearance and physical characteristics of the mixture is such that the presence of regulated levels of HW is often undetectable, except by chemical testing.



In addition to regulatory problems associated with unauthorized HW disposal into waste oil, contamination by HW, water, dirt, anti-freeze, detergents and other wastes greatly increase disposal costs. With costs of HW and waste oil disposal increasing and responsibilities for paying these costs being transferred to local activities, failure to minimize costs through better management of waste POL will adversely affect the mission. Historically, POL contaminated soil residues from spills and sloppy housekeeping have been disposed of as a solid waste at the Base Sanitary landfill. Regulations have tightened up in this area and there is a trend towards further restrictions. With groundwater being Camp Lejeune's sole source of drinking water, there is concern on part of several managers within the complex over the need to stringently control types of wastes placed in Camp Lejeune's landfill. It should be noted that the landfill is, to the best of our knowledge, operated in compliance with existing rules and standards.

3. While the support of organizations generating waste POL's is required for maximum efficiency of operation and compliance with regulatory standards, primary responsibility for managing the collection and disposal of waste POL's is clearly assigned to the Facilities Department. The following officials have had significant involvement in one or more phases of waste oil management and related emergency spill response:

- a. Environmental Engineer, AC/S, Facilities
- b. Public Works Officer
- c. Base Fire Chief
- d. Base Fire Inspector(s)
- e. Base Maintenance Officer
- f. Admin Branch Director, Base Maintenance Division
- g. Utilities Branch Director, Base Maintenance Division
- h. Operation Branch Director, Base Maintenance Division
- i. Maintenance and Repair Director, Base Maintenance Division
- j. Outside Plumbing, Utilities Branch, (formally in M&R Branch)
- k. General Services
- 1. Heavy Equipment General Foreman
- m. Director, NREAD

2



Reduction of the number of supervisors within the General Services Section of M&R Branch as a result of "streamlining" associated with CA review had a negative effect on the waste oil program. The program which has steadily improved from the mid 1970's through 1983, began to deteriorate in the 1984-85 time frame. The relatively low priority placed on waste oil management combined with the large number of unfilled positions in the M&R Branch and Utilities Branch have created the current perception that an emergency exists requiring major organizational changes.

4. Major oil pollution control and abatement functions are:

a. Collection of waste oil is curerntly assigned to the Heavy Equipment Unit, Maintenance and Repair Branch, Base Maintenance Division. There is currently only one permanent billet assigned to the function. The position became vacant this past summer when the incumbent took another position in the Logistics Department. Base Maintenance submitted a requisition to fill the permanent billet with a temporary in early August. The requisition was subsequently returned by CPO to Base Maintenance. Base Maintenance is in the process of resubmitting the requisition to fill the position with a permanent employee. The Heavy Equipment General Foreman has advised that three billets (two motor vehicle operators and one laborer) are required to collect oil from collection points and skim oil from pollution abatement The function properly carried out will require major facilities. clerical input.

b. <u>Maintenance of oil water separators</u> and related pollution abatement facilities is currently assigned to the Heavy Equipment Unit, Maintenance and Repair branch, Base Maintenance Division, with support from Utilities Branch, Base Maintenance Division. There is currently one permanent WG-7 Motor Vehicle Operator billet assigned to the function. The billet is currently filled with a very capable individual. The Heavy Equipment General Foreman advises that one Motor Vehicle operator and one laborer are required to do this function. The function is supported by Heavy Equipment Operators and Utilities personnel. Work involves cleaning grit and debris from facilities, clearing of stopped up drain lines, maintenance of pumps and controls and inspections to identify repair requirements.

c. Response to oil and hazardous material spills in support of the Marine Corps On-Scene Commander (Base Fire Chief) requests for labor and equipment to contain and cleanup spills is a function affected by the proposed realignment. As long as the personnel discussed in 4a and 4b above are available (radio communications), properly trained and properly equipped, this is no major advantage regarding where they are assigned, i.e., BMO or NREAD. The significant issue is who will supervise them during actual spill containment and cleanup. In the majority

3



of spills, aggressive action by Base Fire Department can minimize cost of spill containment and cleanup. Use of personnel/resources of the organization spilling the material should be utilized as the first source of labor/equipment/supplies. Supervision of spill containment and cleanup should be done by Base Fire Department wherever practical, with responsibility being transferred to NREAD for spills which have been contained but cleanup will be an extended operation. Supervision and assistance by Base Fire Department is critical in controlling overtime costs for spills after normal working hours, holidays and weekends. In any case, the initial Base Fire Department evaluation of the spill scene and scope of containment and clean-up determines how efficiently we handle spills. a two man crew will be required. This will give NREAD capability to handle HW transportation with TMO support.

5. Unless burning of waste oil locally for recovery of energy becomes a major issue/aspect of the the program, there are no driving forces toward locating the waste oil collection and disposal function in the Base Maintenance Division except the obvious flexibility offered due to larger work force. Maintenance of oil/water separators however, is an inherited maintenance function requiring routine support of several maintenance shops, particularly Outside Plumbing, Wastewater Treatment and Heavy Equipment. Specialized maintenance equipment is required which is also routinely used in other Base Maintenance functions. An argument can be made for separating the waste oil collection and disposal function from the oil/water separator maintenance function.

The advantages of placing the waste oil collection and 6. disposal function within NREAD is that high priority would likely be placed on waste oil management on a continuing basis. Additionally, recognized NREAD authorities to initiate corrective action to address discrepancies on the part of generating units including tenant commands, would allow effective management and control of all aspects of waste oil collection and disposal. While BMO technically has authority to shut down improperly operated waste oil collection facilities (BO 11090.3), the traditional relationship between BMO and its "Customers" is in conflict with the role of BMO as an enforcement agency. Another advantage is that it then becomes feasible to consolidate HW transportation (i.e. from AC/S, LOG to NREAD) and have NREAD assume responsibility for transporting hazardous wastes from generator to DRMO. The benefits to this are obvious.

4,



The main disadvantage to transferring the responsibility for collection of waste oil to NREAD is the inflexibility of NREAD in dealing with vacancies, absences, and sudden peaks of workload. If the following guidelines (expectations) are accepted by all parties involved, then transfer of the waste oil collection and disposal function should be successful.

a. That the current table of organization (equivalent) of the Soil, Water and Environmental Branch, NREAD, is maintained plus the additional billets, shown in recommended action #1 below;

b. That use of overtime by the Branch will frequently be relatively high, if the Branch plays any significant role in cleaning up spills (other than present advisory capacity);

c. That the additional billets will be skilled positions and would need to be permanent, well trained personnel;

Three other issues are pertinent. First, AC/S, Facilities must 7. rely on the Fire Chief to respond to and direct emergency spill response. Both BMO and NREAD must subordinate themselves to the Fire Chief in these situations. Both must make whatever resources they have available to the Fire Chief when requested. It will be the Fire Chief's responsibility to keep abreast of those resources available and the impact of pulling these resources off their assigned work to support emergency response. During an actual spill, NREAD and BMO's authority to withhold requested support should be very limited. Secondly, can we maintain a stable workforce of motivated, skilled personnel capable of making good, safe judgements under the stress of emergencies and/or relatively complex regulatory requirements? Inevitably, the oil collection crew along with Fire Department personnel will constitute the basic Camp Lejeune HAZMAT Team. They will be subject to assisting with emergencies in the surrounding community. Lastly, in order for NREAD to be effective the Director must have direct control of resources required to implement the program. Specifically, NREAD must control its budget and financial management. It is unacceptable that the Natural Resources Officer must obtain funding from its peer organization, Fund Administrator 23, Base Maintenance.

Recommended Action:

1. Transfer waste oil management to NREAD (See Attachment (A) for functions).

2. Consolidate responsiblity for maintenance, repair of oil/water separators and related wastewater collection, pretreatment and disposal facilities under the Utilties Branch, Base Maintenance Division (See Attachment (B) for functions).



4.

3. Create a separate fund administrator for NREAD and transfer a budget clerk billet from Base Maintenance Division to NREAD to support this function (See Attachment (A)).

DATE Recommendation: CONCUR NON-CONCUR #1 BMO #2 #3 Deputy, AC/S, #1 Facilities #2 #3 AC/S, Comptroller: Recommendation #3 APPROVED DISAPPROVED AC/S, Facilities #1 #2 #3

J. I. WOOTEN Director, Natural Resources Division



TRANSFER OF WASTE OIL MANAGEMENT FROM BMO TO NREAD

FUNCTION

Waste oil collection. transportation and disposal. Hazardous waste transportation oil spill response

RESOURCES

1-Supervisor

3-WG-7 Motor

3-Waste Oil

1-Stake Body

HAZMAT Handlers

1-4 wheel drive

Following tanks:

Accessory bldgs

and structures associated with

the above storage

2-HAZMAT Handlers

Collection trucks

1-Clerk

truck

pickup

S-888

S-889

S-890

S-891

tanks.

etc.

NREAD

1. Assume total management and execution for collection, storage, billets to Vehicle Operators/ disposal and administration of waste oil.

> 2. Request AC/S, Comptroller to assign NREAD as Program Administrator for Class II Property.

1-Forklift/trailer 3. Assign Program Supervisor from inhouse assets.

> 4. Provide first response for containment & cleanup of spills requests from Base Fire Deptment.

5. Request assist-

ance for heavy equipment or labor for Maintain invenspills beyond own tory of specialcapability from Base ized spill Maintenance via response equipon-scene commander ment and supplies including but not limited to preloaded trailer loaded with 500 ft of floating boom, matting, pom pom, hand tools, drums for hazardous material, absorbent

MAINTENANCE

1. Transfer equipment and establish 3 vehicle operators, 2 HAZMAT and 1 clerk position in NREAD.

2. Provide spill response assistance as requested by on-scene Commander (i.e. Base Fire Chief Representative)


FUNCTION	RESOURCES	NREAD	MAINTENANCE
OFFICE SPACE	All of Bldg. 1103 not assigned to Special Services & the Paint Shop Area at South West	<pre>1. Assume custody of Bldg. 1103 & desig- nated portion of 1102.</pre>	1. Assist with re-assignment of Bldgs. 1102 & 1103.
	End of Bldg. 1102.	2. Request AC/S, Comptroller to transfer Bldg. 1102	2. Move Plumbing Shop from Bldg. 1103.
BUDGET/FINANCIAL	Budget Clerk	 Assume total responsibility for budgeting, financial management, and administration of funds assigned to NREAD and Environmental Engineer. 	<pre>1. Transfer one billet from Base Maintenance to NREAD for the establishment of a budget Clerk.</pre>
VEHICLE PARKING	Parking lot between buildings 1102 and 1103.	 Utilize parking space adjacent to portions of buildings 1102 & 1103 assigned to NREAD. 	 Park only vehicles from Shop 61 and 62 in space between buildings 1102 & 1103 adjacent to portions of building 1102 occupied by Base Maintenance.



CONSOLIDATION OF RESPONSIBILITY FOR MAINTENANCE AND REPAIR OF OIL-WATER SEPARATORS AND RELATED WASTEWATER COLLECTION, PRETREATMENT AND DISPOSAL FACILITIES UNDER UTILITIES BRANCH, BASE MAINTENANCE DIVISION

FUNCTIONS	RESOURCES	UTILITIES BRANCH	MAINTENANCE & REPAIR BRANCH
Maintenance of oil-water separators, including cleaning and	l-Vac All truck l-Motor vehicle operator	 Assume operational support of all oil- water separators to include cleaning & inspection. 	 Transfer equipment and two billets. Provide heavy equipment support as requested.
inspection.	l-Laborer	 Request assistance from M&R Branch for heavy equipment support on larg separators such as Boat Basin and Courthouse Bay. 	e
Servicing con- tainment basins at Fire Protec- tion Division burn pits used for fire fighter training.	No additional	1. Assume responsibility	1. None
Monitoring & disposing of PCB transformers including inspecting and maintaining records.	Dedicated area in Lot 140.	 Coordination with Base Environmental Staff. Maintain inventory of all PCB transformers in use at CLNC. Assume custody of PCB transformers from Base Maintenance or 	 Assign dedicated area in Lot 140 to Utilities for temporary storage of PCB transformers awaiting disposal. Assist in spill response.
		<pre>from contractors that are taken out of service. 4. Dispose of PCB transformers that are no longer</pre>	

required at CLNC.

ATTACHMENT (B)







ASSISTANT CHIEF OF STAFF, FACILITIES HEADQUARTERS, MARINE CORPS BASE

DATE 12-23-87

TO:

BASE MAINT O

PUBLIC WORKS O

COMM-ELECT O

DIR, FAMILY HOUSING DIR, BACHELOR HOUSING BASE FIRE CHIEF

DIR., NAT. RESOURCES & ENV. AFFAIRS

ATTN: Ma Illosto

1. Attached is forwarded for info/action.

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

3 Your file copy. No for ther action planned. Request you advise if for ther into is received which # changes the circumstances

Sullem "LET'S THINK OF A FEW REASONS"

WHY IT CAN BE DONE"





UNITED STATES MARINE CORPS 2d FORCE SERVICE SUPPORT GROUP (REIN) FLEET MARINE FORCE, ATLANTIC CAMP LEJEUNE, NORTH CAROLINA 28542-5701

IN REPLY REFER TO: 6260.7H 4 DEC 18 1987

From: Commanding General To: Commanding General, Marine Corps Base, Camp Lejeune, North Carolina 28542-5001 (AC/S, Facilities)

Subj: HAZARDOUS MATERIAL SAFETY ISSUE AT BUILDING FC-40 (2D MAINTBN MOTOR POOL)

Ref: (a) CG, MCB ltr 6280/2 FAC of 8 Dec 87

Encl: (1) CO, 2d MaintBn ltr 5100 7/4 dtd 16 Dec 87

1. The enclosure is readdressed and forwarded in response to the reference.

Point of contact this headquarters is Lt Byrnes at extension
 3924.

U.W. V. W. RYAN. JR. By direction

Copy to: CO, 2d MaintBn





UNITED STATES MARINE CORPS 2d MAINTENANCE BATTALION 2d FORCE SERVICE SUPPORT GROUP (REIN) FLEET MARINE FORCE, ATLANTIC CAMP LEJEUNE, NORTH CAROLINA 28542-5704

5118589^{Y REFER TO:} 7/4 16 Dec 87

From: Commanding Officer, 2d Maintenance Battalion To: Commanding General, 2d Force Service Support Group (Rein) Fleet Marine Force, Atlantic, Camp Lejeune, NC 28542-5701 (G-4)

Subj: HAZARDOUS WASTE SAFETY ISSUE AT BLDG FC-40, 2D MAINT-ENANCE BATTALION MOTOR FOOL

Encl: (1) CO, HQSVCCo ltr 5100 HS/kgb of 13 Dec 87 w/enclosures

1. Enclosure (1) contains the inquiry conducted concerning the allegations of unsafe practices regarding carcinogenic paint.

2. All carcinogenic paint received is accounted for and is properly secured.

 The paint has not been and will not be used until instructions delineating its proper use are published.

DOWNING

By direction



UNITED STATES MARINE CORPS Headquarters & Service Company 2d Maintenance Battalion 2d Force Service Support Group(REIN) Fleet Marine Force, Atlantic Camp Lejeune, North Carolina 28542-5704

> 5100 HS/kgb 13 Dec 87

From: Commanding Officer, Headquarters & Service Company To: Commanding Officer, 2d Maintenance Battalion

Subj: HAZARDOUS WASTE SAFETY ISSUE AT BLDG FC-40, 2D MAINTENANCE BATTALION MOTOR POOL INQUIRIES

Ref: (a) CG 2d FSSG 1tr 62607H G4 dtd 9 Dec 87

Encl: (1) CG 2d FSSG 1tr

1. Per the reference, a preliminary inquiry was conducted on 11 Dec 1987. I found that the 2d Maintenance Battalion Motor Pool did in fact recieve 11 quart cans of polyurethane type II MILC46168D carsogenic paint and 6 1/2 pint cans of aliphatic polyisocyanate activator in three separate shipments. The items were initially recieved in sealed cardboard containers and kept in the Battalion Motor Pool Tool Room. The items were later taken out of the containers and moved from the tool room to a paint locker and it was believed by mechanic personnel that one quart can of carsogenic paint was missing. A review of the receipt documents and interviews conducted with the Motor Pool supply clerks revealed that all the carsogenic paints and the activators received at the Motor Pool is in fact on hand.

2. The informant letter written is in error on the quantities on hand and quantities received.

3. There is no mismanagement of Hazardous Materials nor are there mismanangement of carsogenic paints. The unidentified informant is another person who assumed the worse was happening.







UNITED STATES MARINE CORPS 2d FORCE SERVICE SUPPORT GROUP (REIN) FLEET MARINE FORCE, ATLANTIC CAMP LEJEUNE, NORTH CAROLINA 28542-5701

N REPLY REFER TO: 6260.7H 64 09 DEC 1987

From: Commanding General

- To: Commanding Officer, Second Maintenance Battalion, Second Force Service Support Group (REIN), Fleet Marine Force Atlantic
- Subj: HAZARDOUS WASTE SAFETY ISSUE AT BUILDING FC-40 (2D MAINT. BN, MOTOR POOL)

Encl: (1) CG, MCB ltr 6280/2 over FAC dtd 08 Dec 87.

1. Request that an inquiry be conducted into the allegations contained in the enclosure.

2. Further, request a response be provided to AC/S G-4 no later than 16 Dec 87.



6280/2 FAC DEC 0 8 1987

From: Commanding General, Marine Corps Base, Camp Lejeune, North Carolina 28542-5001

- To: Commanding General, 2d Force Service Support Group (Rein) FMFLant (Attn: G-4)
- Subj: HAZARDOUS MATERIAL SAFETY ISSUE AT BUILDING FC-40, (2D MAINT BN, MOTOR POOL)

Encl: (1) Dir NREAD 1tr 6240 NREAD dtd 30 Nov 87

1. The enclosure is forwarded for inquiry/investigation as appropriate. If these materials are, in fact, found to be hazardous, disposition should be handled accordingly.

2. Request you advise this Command the results of your inquiry.

C. States ... within

T. J. DALZELL By direction

SAME AND SHOW TO SHOW TO SHOW



6240 NREAD 30 Nov 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 MATERIAL SAFETY ISSUE AT BUILDING FC-40, (2D MAINT BN, MOTOR POOL)

Encl: (1) John Riggs, Biological Technician memo of 25 Nov 87

1. The enclosure is provided as an item of concern. It is recommended the subject issues at building FC-40 be forwarded to the Commanding General, 2D FSSG for an investigation to establish the facts and appropriate action if criminal activity is involved.

2. I am advised the enclosure addresses chemical agent resistant coating, which is being, or will be used on tactical vehicles. Accordingly, it is recommended PMU/Base Safety be requested to look into the matter to determine if adequate health and safety precautions are in place for the Camp Lejeune complex.

3. NREAD will look into the hazardous waste stream situation to determine if there is a problem. It is also recommended that a copy of the enclosure be provided to Base SJA for information.

J. I. WOOTEN



PNAV 5216/144A (Rev. 8-81)

Memorandum

ATE: 25 November 1987 nom: John Riggs, Biological Technician Director, Notural Resources and Environmental affairs \$30,000 \$7 a: Supervisory Ecologist, Natural Resources and Environmental affailed 751008. UBJ: Care Point / letter 1. attached is a copy of a letter recieved in this office on 25 November 1987. Please review and forward your recommendations. Please note - FC 40, 20 maint. BN motor Pool was not on orea I have previously inspected, Nor do I have any idea "who or whom" this letter was originated by. AB E. Riggs



Natural Resources Environmental Division Blog 1103 (1997) Camp Lederne, DC 28542



To whom it may concern:

This letter is being written to you out of concern for the lives of the personnel who work in Bldg FC 40(2d MaintBn Motor Pool). Somehow, someone ordered Carsogenic. Paint and it was delivered to the Motor Pool. It was being kept in the tool room until someone moved it and put it in the paint locker where someone inadvertently took a can. There were 12 cans delivered as you can see from the enclosed letter. Personnel were informed Monday morning that there was a can missing because there were only eleven cans accountable. Later that afternoon they were told that the can was not missing and that there were only 11 cans from the start. They were also told of the potential danger that the paint could cause if used in the wrong way. So, there is someone out there with this can of paint which is deadly if used in the wrong way, and there is also a chance that this person doesn't know the potential danger that they are in. It would seem that when the paint was discovered missing that the remainder of the paint wouldbe taken out of the area or sent back to where it came from but instead it is being kept in the Motor Transport Officer's office in FC 40 unsecured where anyone could take a can if they wanted to pull a prank or get revenge on someone. This is a sign of irresponsibility on the person in charge of this area. According to the environmental personnel here aboard Camp Lejeune, the paint is not to be used unless adequate facilities have been furnished and certain health specifications are met in accordance with the enclosed documents. As you can see, this situation should not be taken as lightly as it is being taken. This letter is being written only because of the concern for the personnel who worked in FC 40. It is suggested that proper steps be taken to eradicate this situation as soon as possible and to ensure the safety of the rest of the personnel. It seems that the personnel in charge are being very irresponsible about the lives that have been entrusted in their hands by keeping the paint in the area where anyone could get a hold of it. They are also showing their irresponsibility by disregarding the fact that out there somewhere there is' someone with that missing can of paint. Just think, out there is someone who is potentially dangerous to himself and others if he uses that paint, not knowing that this could be sudden death to him or anyone around him. Think about the rest of those personnel in FC 40 who are still there with those cans of paint unsecured and within anyone's reach-someone might even want to take one and purposely do harm to someone. Do you think that it should even get this far? HOW ARE YOU GOING TO FEEL IF SOMEONE DIES ANF YOU KNOW THAT THERE WAS SOMETHING THAT YOU COULD HAVE DONE ABOUT IT? THINK ABOUT IT!!!

Copy To:

MTO CO, H&SCO CO, 2D MAINTEN) NATURAL RESOURCES & ENVIRONMENTAL AFFAIRS DIVISION





NILES CHEMICAL PAINT COMPANY

MANUFACTURERS OF LACOUERS VARNISHES SYNTHETIC ENAMELS RESINS P.O. BOX 307 225 FORT STREET NILES, MICHIGAN 49120-0307 (616) 683-3377

CERTIFICATION-

This is to certify that the XE-7751 A 383 Green Gallons Of XE-7751 B Activator

Shipped to Camp Lejuene NC 10/87

on their order TPN-B-M3873-lT

Performance specification Mil-C-46168

1

1987.

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Oct

Batch # 42 for A D-111-7-1228-for B

Shelf Life Expiration Date: 1 Year From Above Date Unless Mixed

NILES CHEMICAL PAINT COMPANY

meets the

Vice President Sales on.

Subscribed and sworn to me before this 20 day of

. . . .

Michael L. Troost Berrien County, Michigan My Commission Expires: 12/22/90

·····

UPS





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

IN REPLY REFER TO

6280 LFL/J-721 1 5 OCT 1987

From: Commandant of the Marine Corps

Subj: RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) INVENTORY OF FEDERAL HAZARDOUS WASTE (HW) ACTIVITIES

Ref: (a) MCO P11000.8B

Encl: (1) COMNAVFACENGCOM 1tr 5090 over 1121E of 7 Oct 87

1. Section 3016 of the Resource Conservation and Recovery Act (RCRA) requires Federal activities which currently store or treat hazardous waste (HW), or have at any time disposed of HW, to complete an inventory form. The enclosure tasked the Engineering Field Divisions (EFDs) of the Naval Facilities Engineering Command to compile this information. In accordance with Chapter 4 Section 6 of the reference, you are requested to assist the EFD in collecting these data so as to ensure the 8 January 1988 deadline will be met.

2. Our point of contact is Mr. Paul Hubbell on AV 227-1890.

By direction

CO MCAC NEW DIVID

Distribution: CG MCDEC QUANTICO CG FOURTH MARDIV CG MCRD SAN DIEGO CG FOURTH MAW CG MCLB ALBANY CG MCAS CHERRY POINT CG CG MCB CAMP LEJEUNE CG MCAGCC TWENTYNINE PALMS CG MCLB BARSTOW CG MCRD PARRIS ISLAND CG MCAS EL TORO

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I mode 4 copies of the attached





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

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CO MCAS NEW RIVER CO MCAS BEAUFORT CO MCAS YUMA CO MCAS TUSTIN CO MCAS CAMP PENDLETON CO MCAS KANEOHE BAY CO MCAS CAMP PENDLETON CO MCB CAMP SMITH





DEPARTMENT OF THE NAVY NAVAL FACILITIES ENGINEERING COMMAND 200 STOVALL STREET ALEXANDRIA VA 22332

> 5090 1121E 07 OCT 1987

Commander, Naval Facilities Engineering Command From:

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) SECTION 3016 INVENTORY OF Subj: FEDERAL HAZARDOUS WASTE (HW) ACTIVITIES

(1) 1988 Inventory of Federal Hazardous Waste Activities Form

- (2) Instructions for Completing Inventory of Federal Hazardous Waste Encl: Activities
 - (3) Example of Completed Inventory Form

1. The purpose of this letter is to request that, by 8 Jan 1988, you complete and send us three copies of the enclosure (1) form for each Navy and Marine Corps installation under your cognizance (including Government Owned Contractor Operated (GOCO) facilities) which has sites at which HW is stored, treated or disposed or at which HW has been disposed at any time. Such sites will include RCRA treatment, storage, or disposal sites; Installation Restoration (IR) sites that are planned for or undergoing Remedial Investigation/Feasibility Studies (RI/FS) or have been studied by Confirmation Study and determined to need remedial action; and 103c sites submitted under the Comprehensive Environmental Restoration, Compensation and Liability Act (CERCLA) that are not planned for or undergoing RI/FS. Include information on DLA RCRA sites on Navy-owned property, but do not include information on formerly owned sites. The Army will develop and submit the inventory for formerly owned sites. Please use site names on enclosure (1) that are consistent with Part A/Part B permit applications, the IR program, and CERCLA 103c submissions.

2. We are required by law to submit these forms to EPA and RCRA authorized states by 31 Jan 1988. Please coordinate with installations under your cognizance to develop the best quality forms possible. When you submit the three copies of the inventory to us, please send each installation a copy of the applicable inventory form. We will submit the Navy inventory to EPA as well as the appropriate inventory sections to each state. Enclosure (2) provides general and specific information needed to complete the forms. You will find that Part A/Part B permit applications and IR reports are essential to completing the inventory forms. Enclosure (3) provides an example inventory form for an imaginary Air Force Installation which EPA provided to us. This example may assist you in completing the Navy inventory.



3. When you submit the inventory, please organize the form for each installation as follows:

- a. One Part I for each installation
- b. A sub-package stapled together for each site at the installation, which will include:
 - 1) For RCRA sites: Parts II, III, and V
 - 2) For CERCLA sites: Parts II, IV, and V
 - 3) For sites which are both RCRA and CERCLA: Parts II, III, IV, & V.

4. If you have any questions on how to complete the enclosure (1) forms, please contact Dave Olson or Barbara Sparks. Both can be reached on AV 221-8539 or Commercial (202) 325-8539.

David R. Olen

LEVENTORY OF

D. L. OLSON By direction

Distribution: COMLANTNAVFACENGCOM (11) COMPACNAVFACENGCOM (11) COMWESTNAVFACENGCOM (11) CO SOUTHNAVFACENGCOM (11) CO NORTHNAVFACENGCOM (11) CO CHESNAVFACENGCOM (11)

Copy to: CNO (OP-45) CMC (LFL) CO NEESA WESTNAVFACENGCOMBRO SAN DIEGO WESTNAVFACENGCOM PACNORWESTBRO SILVERDALE


1988 INVENTORY OF FEDERA_ HAZARDOUS WASTE ACTIVITIES

'Pa	art'	I – Complete this	Part for each Facility.
A	R	ESPONSIBLE FEDE	RAL AGENCY:
	1.	Department Name:	
	2.	Agency Name:	
	3.	Address:	(Street, City, State, Zip Code)
B	L	OCATION OF FACI	LITY:
	1.	EPA Region:	
	2.	State:	
	3.	Facility Name:	
	4.	Federal Facility No. (FFIS No.)	
	5.	Address:	
	6.	County, Township	or Latitude/Longitude: (For a rural site with no street address)
	7.	Contact:	
	8.	Phone Number:	(Indicate whether FTS or area code)
	9 .	Number of sites on	this Facility:
		v	Euclosure(1)

Part I, Page 1 of 1



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		-	

Part II - Complete this Part for each Site	e on the Facility.
1 Was this site reported in the 1986 Federal Facilities Invent	
2. Site Name:	
3. Address (if different from Facility address):	
4. a. Is this a RCRA site?	Yes No
b. If yes, identify the regulatory status of the unit(s) at the	e site.
F	RCRA Unit Solid Waste Management Unit
c. If yes, provide EPA ID no. for the RCRA site.	
5. a. Is this a CERCLA site?	Yes No
b. If yes, was a CERCLA §103 Notification submitted?	
Yes Date	No Don't Know
c. If yes, provide EPA ID no. for the CERCLA site.	
If this is a RCRA site only, complete Parts III	and V.
If this is a CERCLA site ONLY, complete Par	ts IV and V.
If this is both a RCRA and CERCLA site, con	nplete Parts III, IV and V.



HEARDARD CENSINN ROVER HAVEN SUCKED STREAMSES

escribe the Hazardous Waste Management				
Units at this Site	Operating	Closed	Date of Closure	No. of Units
Containers				
Tanks				
Surface Impoundments				
Waste Piles			-	
Incineration				
Diher Treatment				
Landfill			1000 - 100 -	
and Treatment				
Inderground Injection				
Other (Describe)				
ndicate if any of the following forms were sul	bmitted for this Si	te and, if so	o, the date of the origi	nal submittal:
	Vec No	Date	Submitted	

	RCRA Part A Permit Application
	RCRA Part B Permit Application
	RCRA Interim Status Closure Plan
	RCRA §3019 Exposure Information Report
	RCRA Post-Closure Permit Application
3.	If a RCRA Part B permit application was submitted, what is its current status?
	Permit Issued Permit Denied No Final Action
4.	If an interim status closure plan was submitted, what is its current status?
	Closure Plan Approved Closure Plan Denied No Final Action
5.	If the closure plan was approved, has closure been certified?
	Yes No

...

• •



'III. 'A. (Cont	(`a.)			
If a post-closure permi	it application was submitted, wh	hat is its current st	atus?	
Permit Issued	Permit Deni	ied	No Final Action	
Hazardous wastes hand	iled in Hazardous Waste Manag	ement Units.		
	Estimated Total Amount		Estima	ated Total Amount d in 1986 and 1987
Waste Code	(Amt/Unit of Measure)	Waste	Code (Amt	Unit of Measure)
		6		
		7.		
2	the and the second second	0		
3		8	Seletti ber seletti en	
4		9		
5		10		
. Describe the solid wa Type	iste management units at this Si No. of Units	ite. 	Туре	No. of Units
. Describe the solid wa Type	iste management units at this Si No. of Units	ite.	Туре	No. of Units
. Describe the solid wa Type	Iste management units at this Si	ite.	Туре	No. of Units
FOR DISPOSAL Landfills)	ste management units at this Si No. of Units SITES ONLY (Surface In	npoundments, V	Type	No. of Units
FOR DISPOSAL Landfills)	ste management units at this Si No. of Units SITES ONLY (Surface In study of this site been	npoundments, V	Type	No. of Units
FOR DISPOSAL Landfills) 1. Has a hydrogeologic conducted? 2. If yes, has the study an authorized state?	ste management units at this Si No. of Units SITES ONLY (Surface In study of this site been	npoundments, V	Type Waste Piles, Lan No No No	No. of Units
FOR DISPOSAL Landfills) 1. Has a hydrogeologic conducted? 2. If yes, has the study an authorized state? 3. If yes:	ste management units at this Si No. of Units SITES ONLY (Surface In study of this site been been submitted to EPA or	npoundments, V	Type	No. of Units
FOR DISPOSAL Landfills) 1. Has a hydrogeologic conducted? 2. If yes, has the study an authorized state? 3. If yes: a. In what form wa or an authorized	ste information submitted to istate?	npoundments, V	Type	No. of Units



4. Has information regarding the withdrawal wells and surface mile of the Site been submitte authorized state?	e location of waters within one to EPA or an	Yes No	
5. If yes:	Street in second or the		
a. In what form was the info or an authorized state?	ormation submitted to	EPA	
b. To what office was the in	formation submitted?		
c. Date of submission:			
	and the second		
			a little for the second
			-
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REPANDARGEDNAM REALERA MENDEDRALANALE

Туре	No. of Units	Туре	No. of Units
	<u>. </u>		
HAZARDOUS SUBSTAN	CES IN CERCLA SI	TES	
Hazardous Substar	nce C	ASR No.	Quantity (Amt/Units of Measure)
1.			•
2.			A Second and
4.			
5	: 		
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Part V. Complete this Part for	both RCRA	and CERCLA	sites.
A. ENVIRONMENTAL CONTAMINATI	ON		
1. Has this site had release(s) to the environmen	n? Yes	No	Don't Know
2. If yes, indicate into which media the release(s)	occurred?		
Air Surfac	e Water	Groundwater	Subsurface Gas
Soil Other			
3. If yes, is there information available concerning the amount, nature, toxicity and concentration of wastes or waste constituents involved in the release(s)?	ing n he Yes	□ No	
4. Has this information been submitted to EPA an authorized State?	or Yes	No No	Don't Know
5. If yes:			
a. In what form was the information submit or the authorized State?	ted to EPA		
b. To what office was the information subm	itted?		
c. Date of submission:			·
6. If yes, is there information available concerning environmental impact of the release, and any	ng the extent of the rel other information nece	ease(s) in terms of the essary for EPA to asse	e lateral extent of release, ass the extent of the release?
	Yes	No	
7. Has this information been submitted to EPA the authorized State?	or Yes	No No	Don't Know
8. If yes:			
a. In what form was the information submitt or the authorized State?	ted to EPA		
b. To what office was the information subm	itted?		
c. Date of submission:			



Facility _

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Has contamination affected contiguous or adjacent property?	Yes	No	
). Has this information been submitted to EPA or the authorized State?	Yes	No No	Don't Know
1. If yes:			
a. In what form was the information submitted or the authorized State?	ю ЕРА		
b. To what office was the information submitte	d?		
c. Date of submission:			
ENVIRONMENTAL MONITORING DAT	Γ A		
 Is environmental monitoring currently being conducted at this site? 	Yes	No No	
. If yes what type of environmental monitoring is	s being conducted	?	
Surface 1	Water [Groundwater	Subsurface G
	escribe)		
Soil Culei (3	:	and the second	
 Have data produced by this monitoring been submitted to EPA or the authorized State? 	Yes	No.	Don't Know
4. If yes:			
a. In what form was the information submitte or the authorized State?	d to EPA		
b. To what office was the information submit	ued?		
c. Date of submission:			1.00
5. If the site is a land disposal site and it does no	t have environment	ntal monitoring data, w	hy not?
45			
	r shiring have		

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Part V (Cont'd.)			P. Barres	
C. CORRECTIVE ACTIONS				
1. Have corrective actions been taken at t	his size?	Yes	No No	
2. If yes, what actions have been taken?				
RERA				
	Not Started	Underway	Completed	Completion Date
RFA				
RFI ·				
Interim Measures				
Corrective Measures Study				
Corrective Measures Implementation				
CERCLA				
	Not Started	Underway	Completed	Completion Date
PA/SI				
RI/FS				3.
Remedial Design	:			
Remedial Action				
Removal				
OTHER (Specify)				
	Not Started	Underway	Completed	Completion Date
		land Pass		



INSTRUCTIONS FOR COMPLETING INVENTORY OF FEDERAL HAZARDOUS WASTE ACTIVITIES

INTRODUCTION

Section 3016 of the Resource Conservation and Recovery Act (RCRA) requires all Federal agencies to "undertake a continuing program to compile, publish and submit to [EPA] an inventory of each [hazardous waste] site the Federal agency owns or operates." Federal agencies must submit this inventory to EPA once every two years.

EPA developed the inventory form to assist Federal Agencies in complying with section 3016.

DEFINITIONS

1. A. 1.

The words and phrases used throughout the inventory form have definitions found in RCRA, 40 CFR Parts 260 and 270, CERCLA, and 40 CFR Part 300.

1. The following is a list of the RCRA definitions which are used in the inventory form.

a. "Facility" means all contiguous land, and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combinations of them).

The term facility is not limited to those portions of the owner's property at which units for the management of solid or hazardous waste are located but rather extends to all contiguous property under the owner or operator's control (see 50 Fed. Reg. 28712). For Navy purposes, facility means installation.

If an installation includes non-contiguous property, treat it in the same manner as it is treated for permitting purposes. Therefore, if an installation has more than one EPA identification number and will receive more than one RCRA permit, each separately permitted area should be considered a "facility".

b. "Hazardous waste management unit" is a contiguous area of land on or in which hazardous waste is placed, or the largest area in which there is significant likelihood of mixing hazardous waste constituents in the same area. Examples of hazardous waste management units include a surface impoundment, a waste pile, a land treatment area, a landfill cell, an incinerator, a tank and its associated piping and underlying containment system, and a container storage area. Each of these entities is a separate HW management unit even if located in the same area of an installation. This is true even when there are two separate management units of the same type in the same area, e.g., two surface impoundments. A container alone does not constitute a unit; the unit includes containers and the land or pad upon which they are placed.

2, -



A RCRA site may contain more than one HW management unit.

c. "Operator" means the person responsible for the overall operation of a site.

d. "Owner" means the person who owns a facility (installation) or part of a facility.

e. "Solid waste management unit" (SWMU) means any discernible waste management unit at a RCRA facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of solid and/or hazardous waste. The SWMU definition includes:

- O Containers, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells, <u>including those units defined as "regulated units" under</u> <u>RCRA</u>.
- O Recycling units, wastewater treatment units and other units which EPA has generally exempted from standards applicable to hazardous waste management units.
- O Areas contaminated by "routine, systematic, and deliberate discharges" from process areas.

Hazardous constituents are listed in Appendix VIII to 40 CFR 261. The potential release does not have to exceed the reportable quantity for a waste management unit to be a SWMU.

The definition does not include accidental spills from production areas and units in which wastes have not been managed (e.g., product storage areas).

A SWMU may be a currently operating unit or a past disposal site. If we have been investigating a past disposal site under the IR program, include it as a CERCLA site rather than a SWMU in the inventory.

2. The following is the CERCLA definition which is used in this questionnaire:

a. "Facility" means any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

GENERAL INSTRUCTIONS

1. If the information you are submitting in response to the inventory form is classified or restricted as national security information, contact Mr. Lee Herwig at EPA's Office of Federal Activities for instructions on how the information is to be handled. He can be reached at (FTS) or (202) 382-5908.



2. If the information you are submitting would normally be considered confidential business information (CBI) under 40 CFR Part 2, your claim of confidentiality must be made when you submit the inventory form. You should also include, if applicable, the legal justification for the information to be treated as classified, restricted as national security, or otherwise confidential.

If you do not submit the claim of confidentiality with your inventory form, EPA may make the information available to the public without further notice to you. Please refer to 40 CFR sections 2.203 and 270.12 for further information on CBI.

3. The inventory form is divided into five Parts. You must complete Part I for each facility (installation) at which hazardous waste sites are located. You must complete the remaining Parts as follows:

RCRA sites only:	Parts II, III, and V		
CERCLA sites only:	Parts II, IV, and V		
Sites which are BOTH RCRA and CERCLA:	Parts II, III, IV, and V.		

You should separate Parts II, III, IV, and V and make the required number of copies of the blank Parts to create a sub-package for each site at an installation. If any of the forms don't contain enough blank spaces to give the necessary information, add additional pages needed to provide the information.

4. Section 3016 requires that you submit information for "each site which the Federal agency owns or operates or has owned or operated at which hazardous waste is stored, treated or disposed of or has been disposed of at any time." <u>This means that you must submit information for sites where hazardous waste</u> <u>has been disposed, even if that disposal occurred before the Navy actually</u> <u>owned or operated the site</u>. This also means that information must be submitted on all solid waste management units, RCRA regulated units and CERCLA units (both those listed and not listed on the National Priorities List) on each installation. You do not need to submit information on formerly owned sites. The Army will develop and submit the inventory for formerly owned sites. However, include information on DLA sites on Navy-owned property.

SPECIFIC INSTRUCTIONS

<u>Part I</u> - You must complete one Part I form for each facility (installation) where there are hazardous waste sites.

A. Responsible Federal Agency

- 1. Department Name is "Department of Defense".
- 2. Agency Name is "Navy".
- 3. Address is "Department of Navy, Washington, D.C. 20350".



<u>Part II - General Site Information</u> .ou must complete a separate Part II of the questionnaire for each hazardous waste site identified under Question 9 of Part I. (See General Instructions #3.)

- 1. Indicate whether information on this form is for a site which <u>was not</u> reported in the 1986 Inventory (NO) or is updating information about a site which <u>was</u> submitted as part of the 1986 Inventory (YES).
- 2. Provide the hazardous waste site name. Use the same site names as on Part A/Part B permit applications, IR studies, or 103c submissions.
 If the site name has changed, list the new site name followed by the old site name in parenthesis.
- 3. Provide the site location address if it is different from the facility address.
- Questions 4 and 5 are intended to provide EPA with information concerning the hazardous waste program under which this site falls. If appropriate, you may check "yes" for both RCRA and CERCLA.
 - a. Check "yes" if:
- the site received hazardous waste (for treatment, storage, or disposal) after November 19, 1980 (a RCRA unit), or
- if it meets the definition of a solid waste management unit (SWMU) and is located at a facility which is required to obtain a RCRA permit.

Check "no" if neither of: these circumstances apply.

- b. If yes, identify the regulatory status of units present at the site. A site may have a RCRA unit only or a RCRA unit and a SWMU. However, a site will not have a SWMU only.
- c. If yes, provide the RCRA EPA Identification No. for that site. If there is more than one identification number, list the additional numbers also.
- 5. a. Check "yes" if the site has not received any hazardous waste since November 19, 1980 and falls under the jurisdiction of CERCLA.
 - Identify whether and when a CERCLA Section 103 notification was submitted to EPA.
 - c. If yes, provide the CERCLA EPA Identification No. for that site.

<u>Part III - RCRA Sites</u> - Complete Part III of the inventory if your answer to Part II, Question 4.a is "yes". You should complete one Part III for <u>each</u> RCRA site.



III.A. Hazardou: Waste Units (RCRA units which received hazardous waste after November 19, 1980)

- 1. . Describe the hazardous waste units at this site.
 - Check whether a unit is operating or closed; you may have both "operating" and "closed" checked under one type of unit (e.g., surface impoundments) if there are more than one of the same type of unit.
 - A unit is operating if it is not closed. A unit is closed only when it has been certified closed as required under 40 CFR Sections 264.115 or 265.115.

The date of closure is the date that you certified in writing that closure occurred as required by the closure plan approved under 40 CFR Section 264.112 or 265.112.

- The "number of units" means the number (total of operating and closed) of individual hazardous waste activities at the site, e.g., three landfills, two container storage areas, or one incinerator.
- One or more of the forms described on the inventory form should have been submitted to either EPA or an authorized State under the requirements of RCRA. Indicate which forms were submitted and the date of the <u>original</u> submittal, not the date of any revised submissions.
- 3-6. Describe the current status of the forms which you identified as having been submitted under Question 2 above. Note that if we indicated units are closed in Part III.A.1., the answer to Part III.a.5. must be "yes".
- 7. Describe the types of hazardous waste handled in the units identified under Question A.1. List only the top 10 types of hazardous waste by amount. (List the waste type with the highest volume as #1. List the remaining waste types in order of decreasing volume.) Use the appropriate waste codes identifies in 40 CFR Part 261. Also provide the amounts of waste handled in Calendar Years 1986 and 1987. The total amounts of waste should correspond with the EPA required biennial report for 1986 and 1987. Note that you need only list the total amount of hazardous waste in each waste code regardless of which units at the site handle the waste.

III.B. Solid Waste Management Units - Provide a description of each of the Solid Waste Management Units at this site. Identify the type of operation (e.g., landfill, surface impoundment) and the number of each type of unit listed.

III.C. For Disposal Sites Only. (Surface Impoundments, Waste Piles, Land Treatment Units, Landfills). If you have completed a Part B permit application, you have the information needed for this section.

1-3. These questions are intended to indicate the type of information available regarding groundwater and surface waters that could be affected by the site. Examples of hydrogeologic studies include



data used to design and construct RCRA groundwater monitoring systems or a CERCLA RI/FS. If you have submitted the study results, please indicate such.

4-5. If you have submitted topographic maps, as required for a RCRA Part B permit application, which show the location of wells and surface waters, EPA will consider you to have supplied the information described in Question 4.

<u>Part IV - CERCLA Sites</u> - Complete Part IV if your answer to Part II Question 5.a._is "yes". Complete one Part IV for <u>each</u> CERCLA site.

IV.A. Provide a description of each CERCLA site. Identify the type of operation (e.g., landfill, surface impoundment) and the number of each type of units listed.

IV.B. Identify the hazardous substances found in the CERCLA sites. Use the list of hazardous substances and the Chemical Abstracts Service Registry Number (CASR No.) provided in 40 CFR Part 302. List only the top 10 types of hazardous substances by amount. (List the hazardous substance with the highest volume as #1. List the remaining hazardous substances in order of decreasing volume.)

Part V - Complete for each RCRA Site and each CERCLA Site

- V.A. Environmental Contamination This section is intended to generally describe the nature and extent of known environmental contamination at the site and, as required by Section 120 of the Superfund Amendments and Reauthorization Act (SARA), to determine whether the contamination has affected contiguous or adjacent properties. It is also intended to identify where the information about the contamination is located. The answers for Section A should not require in-depth, technical data.
 - 1-2. Identify whether releases to the environment have occurred at the site and into which media the releases have occurred.
 - 3-11. These questions are aimed at identifying whether information has been generated about the release. This includes whether that information has been submitted to EPA or an authorized State and if so, when, to whom, and in what form that information was submitted.

Your answers to Questions 5, 8, and 11 are particularly important to enable EPA to locate and use information which you have already provided. You must submit "...the latest available data and information" but RCRA Section 3016 does not require you to resubmit information you have already provided under RCRA Section 3005 (permits) or Section 3010 (notification) or CERCLA Section 103 (notification). However, if EPA cannot readily locate the information, you may be requested to resubmit it.

- V.B. Environmental Monitoring Data
 - 1-5. The questions in this section are intended to provide information about the type and extent of environmental monitoring occurring at the site. Monitoring activities assist both you and EPA in better understarding the nature of releases at your site and identifying appropriate corrective actions.



- B. Facility (Installation) Location
 - Identify the EPA Region in which the facility is located. Use 01, 02, 03, etc. If unsure of the proper region, call the RCRA/CERCLA 'Hotline: (202) 382-3000.
 - 2. Provide the standard abbreviation for the State in which the facility is located.
 - 3. Provide the facility (installation) name.
 - 4. Provide the Federal Facility Information System (FFIS) number. It is a twelve digit code, in which the first two digits represent the state where the facility (installation) is located and the third digit is a dash, e.g., TX-9999999999. If you need help determining the FFIS number, call the RCRA/CERCLA Hotline at (202) 382-3000.
 - 5. Provide the address of the facility.
 - 6. If no street address exists, provide county, township or latitude and longitude for the facility.
 - 7. Provide the name and title of the contact at the Engineering Field Division who is familiar with the waste management activities at the facility. This person should be able to answer questions about the information submitted in this inventory.
 - 8. Provide the telephone number of the contact. Indicate whether the number is FTS or commercial.
 - 9. Provide the number of sites at this facility. Note that for RCRA facilities, solid waste management units (SWMUs) are not counted as separate sites, but are considered part of a RCRA site.

For Navy purposes, CERCLA sites are Installation Restoration (IR) sites that are planned for or undergoing Remedial Investigation/Feasibility Studies (RI/FS) or have been studied by Confirmation Studies and determined to require remedial action. CERCLA sites also include 103c sites submitted under the Comprehensive Environmental Restoration, Compensation and Liability Act (CERCLA) that are not planned for or undergoing RI/FS.

An example of how sites at a facility might be counted follows.



Question V.B.5. applies to only to land disposal sites as defined under RCRA.

V.C. Corrective Actions

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- 1., Indicate whether any corrective actions have been taken at the site. Corrective actions include studies.
- This question requires you to specifically identify the types of corrective actions underway at your site. If the action does not fall neatly under the categories provided identify the action under "Other". Please be as specific as possible.

List all Initial Assessment Studies as "IRP Phase I" under "Other". List any completed Confirmation Studies as "IRP Phase II" under "Other". If you have confirmation studies that are underway and under revision to meet the requirements of a remedial investigation/feasibility study (RI/FS), list them as "RI/FS" under "CERCLA".



Part II - Com	plete this Part for each Site on the Facility.
. GENERAL SI	TE INFORMATION
 Was this site re Site Name: 	Treatment Tanks
3. Address (if diff	ferent from Facility address):
4. a. Is this a R	CRA site? Yes No
b. If yes, iden	nuify the regulatory status of the unit(s) at the site.
c. If yes, pro	ovide EPA ID no. for the RCRA site.
5. a. Is this a C	ERCLA site? Yes No
b. If yes, wa	s a CERCLA §103 Notification submitted?
· 🗆 ,	les Date No Don't Know
c. If yes, pro	ovide EPA ID no. for the CERCLA site.
If this is a R	CRA site only, complete Parts III and V.
If this is a Cl	ERCLA site ONLY, complete Parts IV and V.
If this is both	a RCRA and CERCLA site, complete Parts III, IV and V.
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GENERAL SITE INFORMATION 1. Was this site reported in the 1986 Federal Facili 2. Site Name:	ities Inventory? Types No Mo Dump #1
3. Address (if different from Facility address):	
4. a. Is this a RCRA site?	Yes No
b. If yes, identify the regulatory status of the u	nit(s) at the site.
c. If yes, provide EPA ID no. for the RCRA s	site.
5. a. Is this a CERCLA site?	Yes No
b. If yes, was a CERCLA §103 Notification st	abmitted?
c. If yes, provide EPA ID no. for the CERCL.	A site. NC0123023023
f this is a RCRA site only, complete	Parts III and V.
f this is a CERCLA site ONLY, com	plete Parts IV and V.
f this is both a RCRA and CERCLA	site, complete Parts III, IV and V.

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art II - Complete this Part for e	ach Site on the Facility.
1 Was this site reported in the 1986 Federal Faci	lities Inventory? Yes X No
2 Site Name: AM	mo Pond #3
3. Address (if different from Facility address):	
4. a. Is this a RCRA site?	Yes No
b. If yes, identify the regulatory status of the	unit(s) at the site.
	RCRA Unit Solid Waste Management Unit
c. If yes, provide EPA ID no. for the RCRA	site.
5. a. Is this a CERCLA site?	Yes No
b. If yes, was a CERCLA §103 Notification s	ubmitted?
Yes 12 8 42 Date	No Don't Know
c. If yes, provide EPA ID no. for the CERCL	A site:
	MUUICOURDURD
If this is a RCRA site only, complete	Parts III and V.
If this is a CERCLA site ONLY, com	plete Parts IV and V.
If this is both a RCRA and CERCLA	site, complete Parts III, IV and V.
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EXAMPLE OF SHILL INSTALLATION

Hypothetical DOD Installation

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Alice AFB Treatment Tanks

Part III - Complete this Part for all RCRA Units.

A. HAZARDOUS WASTE MANAGEMENT UNITS (Complete this section only if the units received hazardous waste after November 19, 1980.)

Operating

Closed

1.	Describe	the	Hazardous	Waste	Management
			the second s		

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Units at this Site		
Containers		
Tala		_2
Tanks		
Surface Impoundments	<u> </u>	Barris and and
Waste Piles		
Incidention		
Incineration		
Other Treatment		
Landfill		
Land Treatment		
		Mar and a second
Underground Injection		
Other (Describe)		

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No. of Units

Date of Closure



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Part III - Continued

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2. Indicate if any of the following forms were submitted for this Site and, if so, the date of the original submittal:

		Yes	No	Date Submitted
	RCRA \$3010 Notification	X		8/18/80
	RCRA Part A Permit Application	X		11/19/80
	RCRA Part B Permit Application	X		4/20/84
	RCRA Interim Status Closure Plan		X	
	RCRA §3019 Exposure Information Rep	ion	X	
	RCRA Post-Closure Permit Application		X	
3.	If a RCRA Part B permit application was	submitted, what	at is its cur	rent status?
	Permit Issued	Permit Denied	C	No Final Action
4.	If an interim status closure plan was sub-	nitted, what is i	its current s	tatus?
	Closure Plan Approved	Closure Plan D	Denied	No Final Action
5.	If the closure plan was approved, has clos	ure been certifie	ed?	
	Yes	No		
6.	If a post-closure permit application was	submitted, what	is its curre	ent status?
	Permit Issued	Permit Denied	E	No Final Action



Alice AFB Part III - Continued

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Treatment Tanks

7. Hazardous wastes handled in Hazardous Waste Management Units.

- Waste Code	Estimated Total Amount Handled in 1986 and 1987 (Amt/Unit of Measure)	Waste Code	Estimated Total Amount Handled in 1986 and 1987 (Amt/Unit of Measure)
1-K044	73,000 gallons	6	
2. KO47	4000 aullons	7	
3	0	8	
4.		9	
5		10	



	- Complete this	Part for each Facility.	
A. RE	SPONSIBLE FEDE	RAL AGENCY:	
1.	Department Name:	DOD	and a second
2.	Agency Name:	Air Force	
3.	Address:	The Pentagon, Washi (Street, City, State, Zip Eode)	ngton, DC 2000
B. LC	CATION OF FACI	LITY:	
1.	EPA Region:	04	
2.	State:	NC	
3.	Facility Name:	Alice Air Force Ba.	5e
4.	Federal Facility No. (FFIS No.)	NC-1230a	3023
5.	Address:	Mudville, N.C. 0850	20
6.	County, Township	or Latitude/Longitude: <u>Clay (Ou</u> (For a rural site with	no street address)
7.	Contact:	Col. Mary Smith	
8.	Phone Number:	FTS $IZ3 - 44(Indicate whether FTS or area code)$	567
9.	Number of sites on	this Facility: <u>3</u>	

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Treatment Tanks

B. SOLID WASTE MANAGEMENT UNITS (Complete for all units not listed under Section A.)

1. Describe the solid waste management units at this Site.

Type closed in nafill	No. of Units	Туре	No. of Units
NOT_	3		
			A Carrier



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		han an a	
Has a hydrogeologic study of this site been conducted?	Yes	No	Don't Know
2. If yes, has the study been submitted to EPA or an authorized state?	Yes	No No	Don't Know
3. If yes:			
a. In what form was the information submitted to or an authorized state?	EPA		
b. To what office was the information submitted?	A CONTRACT		
c. Date of submission:			
Has information regarding the location of withdrawal wells and surface waters within one mile of the Site been submitted to EPA or an authorized state?		Yes	No
5. If yes:			
a. In what form was the information submitted to or an authorized state?	ЕРА		
b. To what office was the information submitted?	:		
a Data of submission:		No.	



DESCRIBE THE CERCLA SITES		
Type No. of Units	Туре	No. of Units
HAZARDOUS SUBSTANCES IN CERC	LA SITES	Quantity
Hazardous Substance	CASR No. 506774	(Ami/Units of Measure) 4200 tons
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6		and a shirt all
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Type Ammo Pond #3	RCLA SITES No. of Units 3	Туре	No. of Units
HAZARDOUS SUB	STANCES IN CERCLA	SITES	
Hazardous:	Substance	CASR No. 542756	Quantity (Amt/Units of Measure) 3750 Lbs
2			
4 5			s
6 7		<u>.</u>	
8 9			
10. <u> </u>			

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Part V. Complete this Pa	rt for both RCRA	and CERCLA	sites.
A. : ENVIRONMENTAL CONTAM			— —
1. Has Lis site had release(s) to the env	ironment?	No No	Don't Know
2. If yes, indicate into which media the r	elease(s) occurred?		
Air	Surface Water	Groundwater	Subsurface Gas
Soil	Other		
 If yes, is there information available the amount, nature, toxicity and com of wastes or waste constituents invo release(s)? 	concerning centration lved in the Yes	□ No	
4. Has this information been submitted an authorized State?	to EPA or Yes	No.	Don't Know
5. If yes:			
a. In what form was the information or the authorized State?	n submitted to EPA	RP Phase	I Report
b. To what office was the informati	ion submitted?	A Region I	<u>V</u>
c. Date of submission:	8	1/87	
		and the second second	

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'ar	t V. Complete	this Part f	or both RCRA	and CERCLA	sites.
	ENVIRONMENTAL	CONTAMINA	TION		al an anna an an ann an an
1.	Has this site had release(s	s) to the environm	ient? Yes	No No	Don't Know
2. 1	If yes, indicate into which	media the release	(s) occurred?		
	Air	Surl	face Water	Groundwater	Subsurface Ga
	Soil	Out	er		
3.	If yes, is there information	n available conce	aning		
	the amount, nature, toxic of wastes or waste const release(s)?	ituents involved i	n the Yes	No	
4.	Has this information bee an authorized State?	n submitted to El	PA or Yes	No	Don't Know
5.	If yes:				
		:- formation only	mitted to EDA		
	or the authorized Sta	te?			
	or the authorized Sta b. To what office was th	te?	bmitted?		
	or the authorized Stab. To what office was thc. Date of submission:	te? he information su	bmitted?		
	or the authorized Sta b. To what office was th c. Date of submission:	te? he information su	bmitted?		
	or the authorized Sta b. To what office was th c. Date of submission:	te? he information su	bmitted?		
	or the authorized Sta b. To what office was th c. Date of submission:	te? he information su	bmitted?		
	or the authorized Sta b. To what office was th c. Date of submission:	te? he information su	bmitted?		
	or the authorized Sta b. To what office was th c. Date of submission:	te? he information su	bmitted?		
	or the authorized Sta b. To what office was th c. Date of submission:	te? he information su	bmitted?		
	or the authorized Sta b. To what office was th c. Date of submission:	te? he information su	bmitted?		
	or the authorized Sta b. To what office was th c. Date of submission:	te? he information su	bmitted?		
	or the authorized Sta b. To what office was th c. Date of submission:	te? he information su	bmitted?		
	or the authorized Sta b. To what office was th c. Date of submission:	te? he information su	bmitted?		
	or the authorized Sta b. To what office was th c. Date of submission:	te? he information su	bmitted?		
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Allice AFB	Amono Dor	np #1	
Part V. Complete	e this Part for both RCR.	A and CERCLA	sites.
1. Has this site had release	(s) to the environment? Yes	No No	Don't Know
2. If yes, indicate into which	h media the release(s) occurred?	Groundwater	Subsurface Gas
Soil	Other		
the amount, nature, toxi of wastes or waste cons release(s)?	icity and concentration tituents involved in the Yes	No	
 Has this information be an authorized State? 	en submitted to EPA or Yes	No	Don't Know
 5. If yes: a. In what form was th or the authorized State b. To what office was the 	e information submitted to EPA		
c. Date of submission:			•

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Treatment Tanks

6. If yes, is there information available concerning the extent of the release(s) in terms of the lateral extent of release, environmental impact of the release, and any other information necessary for EPA to assess the extent of the release?

7.	Has this information been submitted to EPA or the authorized State?	Yes	No No	
8.	If yes:			
	a. In what form was the information submitted to EP or the authorized State?	×A		
	b. To what office was the information submitted?			
	c. Date of submission:		Carl Contract	
	 Has contamination affected contiguous or adjacent property? 	Yes		
	10. Has this information been submitted to EPA or the authorized State?	Yes	No No	Don't Know
	11. If yes:			•
	a. In what form was the information submitted to or the authorized State?	EPA		
	b. To what office was the information submitted?	? <u>.</u>		
	c. Date of submission:			



Alice AFB Ann Dump #1 Part V.- Continued

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6. I	f yes, is there information available concerning the extent of the release(s) in terms of the lateral extent of release, nvironmental impact of the release, and any other information necessary for EPA to assess the extent of the release?
7. 8.	Has-this information been submitted to EPA or Yes No the authorized State? If yes: Yes No Don't Know
	a. In what form was the information submitted to EPA or the authorized State?
	b. To what office was the information submitted?
	c. Date of submission:
9	Has contamination affected contiguous or adjacent property? Yes No
	0. Has this information been submitted to EPA or the authorized State? Yes No Don't Know
	11. If yes:
	a. In what form was the information submitted to EPA <u>Well logs</u> or the authorized State? NC_Dept of ENV. Resources
	b. To what office was the information submitted? c. Date of submission:



Alice AFB Part V.- Continued

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Ammo Pond #3

6. If yes, is there information available concerning the extent of the release(s) in terms of the lateral extent of release, environmental impact of the release, and any other information necessary for EPA to assess the extent of the release?

25 VYes No 7. Has this information been submitted to EPA or the authorized State? 8. If yes: IRP Phase I Report a. In what form was the information submitted to EPA or the authorized State? PA legion II b. To what office was the information submitted? 47 c. Date of submission: 9. Has contamination affected contiguous or 1-X1 No Yes adjacent property? 10. Has this information been submitted to EPA or Don't Know No Yes the authorized State? 11. If yes: a. In what form was the information submitted to EPA or the authorized State? b. To what office was the information submitted? c. Date of submission:



Al	ice AFB	AmmoDum	p#1	
Par	t V Continued	Are instructions		
		ONITODING DATA		
В.	ENVIRONMENIAL M	UNITORING DATA		
1. Is	environmental monitoring onducted at this site?	currently being Yes	No No	
2. 16	yes, what type of environm	ental monitoring is being conducted	d?	
Г		Surface Water	Coundwater	Subsurface Ga
. L		Sullace watch		
Ŀ	Soil	Other (describe)		
3. Ha sul	ave data produced by this m bmitted to EPA or the authority	onitoring been prized State? Yes	No	Don't Know
4. If	f yes:			
a	In what form was the info or the authorized State?	ormation submitted to EPA		
b.	. To what office was the in	formation submitted?		
c	. Date of submission:		12 Contraction	
5. If	the site is a land disposal s	te and it does not have environmer	tal monitoring data, why	y not?
·				
	100 - 10 - 10 - 10 - 10 - 10 - 10 - 10			

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B.	ENVIRONMENTAL MONITORING DATA
1.	ts environmental monitoring currently being Yes No
2	t yes, what type of environmental monitoring is being conducted?
	Air Surface Water Groundwater Subsurface G
	Soil Other (describe)
3.	Have data produced by this monitoring been submitted to EPA or the authorized State? Yes No Don't Know
4.	If yes:
	a. In what form was the information submitted to EPA or the authorized State?
	b. To what office was the information submitted?
	c. Date of submission.
5.	If the site is a land disposal site and it does not have environmental monitoring data, why not?
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D. DWUDON	MENTAL M	NITORING	DATA			
B. ENVIRON	MENTAL M			a second and		
1. Is environmen conducted at t	tal monitoring c his site?	urrently being	Ye	. E	No	
2. If yes, what ty	pe of environme	ntal monitoring	g is being cond	lucted?		
Air Soil		Surfac	e Water (describe)	G	roundwater	Subsurface (
3. Have data pro submitted to E	duced by this mo PA or the autho	nitoring been rized State?	X Ye	s [No	Don't Know
4. If yes:						
a. In what for or the aut	rm was the info norized State?	mation submit	ued to EPA	NCAL	ir Qua	lify Reports
b. To what c	ffice was the inf	ormation subm	niued?	UC DE	ptop	ENV. RESOUR
Deve of a	.hmission:		(lalest)	6/30	187
c. Date of s	Iomission.					hu not?
5. If the site is a	land disposal si	te and it does r	tot have enviro	nmental mon	itoring data, w	ny not:
			198 - 198 P			and the second of
		4	:			
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A REAL PROPERTY.	Real Property and					•

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Part V.- Continued C. CORRECTIVE ACTIONS X Yes 1. Have corrective actions been taken at this site? No 2. If yes, what actions have been taken? RCRA Not Started Underway Completed **Completion** Date RFA RFI Interim Measures Corrective Measures Study Corrective Measures Implementation CERCLA Not Started Underway Completed Completion Date PA/SI RI/FS Remedial Design Remedial Action Removal OTHER (Specify) Not Started Underway Completed **Completion** Date

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CORRECTIVE ACTIONS		4	Contraction of the second second	
Have corrective actions been taken a	at this site?	Yes	No	
If yes, what actions have been taken	1?			
RCRA				
	Not Started	Underway	Completed	Completion Date
RFA				
RFI			Ц	
Interim Measures				
Corrective Measures Study				
Corrective Measures Implementation	on 🗌			
CERCLA				
	Not Started	Underway	Completed	Completion Date
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HAZARDOUS WASTE TRAINING COURSE

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MCB CAMP LEJEUNE

September 8-11, 1987



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HAZARDOUS WASTE LAWS, REGULATIONS, AND POLICIES

I. Learning Outcomes Desired.

In this unit of instruction, we will be considering some of the requirements of Federal legislation. At the completion of this unit, you should:

- A. Have a basic understanding of the various laws and regulations and how they affect your job.
- B. Be able to perform your duties so that they neither violate laws or regulations nor cause others to violate them.
- II. Introduction.
 - A. In the past decade or two, Congress has passed much legislation in an attempt to deal with the growing quantity of toxic and hazardous wastes. The following Federal laws relate to this topic:
 - 1. Resource Conservation and Recovery Act (RCRA)
 - 2. Toxic Substance Control Act (TSCA)
 - 3. Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA or Superfund)
 - 4. Clean Water Act
 - B. As a result of this legislation, the Department of Defense (DOD) and the Navy have issued regulations:
 - 1. Defense Environmental Quality Program Policy Memorandums (DEQPPM)

2. OPNAVINST 5090, Environmental Protection and Natural Resources Manual (formerly, OPNAVINST 6240.3E)

The Federal laws provide a framework within which our society will attempt to deal with a very complex and controversial problem. At the activity level, the commanding officer has the responsibility for compliance with these laws and their regulations. The commanding officer designates an environmental coordinator to serve as a focal point to coordinate activity hazardous material/waste management programs. This coordinator develops a plan that describes how to handle hazardous wastes to remain in compliance with the laws and regulations.

Those who actually handle hazardous wastes at the activity play a key role in this plan. Their actions, to a large extent, determine the activity's compliance with applicable regulations. The way they handle hazardous wastes affects their own health and the health and environment of the people at the activity.

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The hazardous waste handler is in a very important position, one which should be supported and respected by everyone. Handlers need not know the specifics of the federal laws mentioned above, but a knowledge of the laws' basic requirements can help them do their job.

- B. The hazardous waste problem is complex and controversial for a number of reasons. For example:
 - 1. Our society has grown accustomed to a chemical environment. We know that chemicals of various types are very useful and desirable. In many cases, however, we lack sufficient knowledge and background to make independent decisions on the use and disposal of specific chemicals.
 - 2. Economic and political pressures work against change.
 - 3. Disposal methods for toxic and hazardous wastes are not completely satisfactory. For example:
 - (a) Incineration is an effective but expensive disposal method. It may also create air quality problems.
 - (b) Deep-well injection is basically a storage method and it may contaminate ground-water if geology is not considered, or if operation is not properly managed.
 - (c) Chemical landfills-similar to sanitary landfills, except engineered to prevent leachate from leaving disposal site, are expensive and may not entirely prevent leachate from contaminating ground water.
 - (d) Ocean dumping is relatively inexpensive, but may be heavily regulated in the future.
 - (e) Recycling of wastes is an ideal solution but may require expensive redesigning of processes and additional management requirements.
 - (f) "Midnight dumping" is very popular, and cheap for the dumper. But it is very expensive for the rest of the society that it poisons.
 - 5. Because of the way toxic and hazardous substances are being handled during manufacturing, use, and disposal, people are becoming more and more aware of the possibility of personal exposure. The scientific community is not unified on the effects of toxic and hazardous substances on health and the environment. It is difficult for people to determine which chemicals they may be exposed to, what the health effects may be, the type of personal protective equipment they should use and how significant their exposure may be.

- III. Additional Reference Material.
 - A. <u>Consolidated Hazardous Material/Hazardous Waste Disposal Guidance</u>, DOD-A summary of guidance found in the DEOPPMs.
 - B. <u>Pollution Abatement at Naval Shore Facilties</u>, NEESA-A plain language summary of Federal environmental laws and regulations.
- IV. Resource Conservation and Recovery Act (RCRA).
 - A. Overview of the Act.

RCRA is the law that has the most impact on how people handle hazardous waste (HW). Under subtitle "C" of RCRA, Congress gave EPA the job of developing and implementing a national plan to control hazardous waste. In February and May 1980, EPA published the first of its HW regulations in the <u>Federal Register</u>. The basic purpose of these regulations is to protect human health and the environment from improperly managed HW. Participants in the system will include waste generators, waste transporters, and the owners and operators of waste treatment, storage, and disposal facilities.

- B. Overview of the Regulations.
 - 1. HW Identification.
 - (a) A waste is any material which has served its original purpose. This includes materials intended for reuse, recycling, and recovery even if sold for this purpose.
 - (b) Solid wastes are solid, liquid, semisolid, or gaseous materials, except:
 - Domestic sewage or mixtures of domestic sewage and other wastes going to a publicly owned treatment works (POTW).
 - Point source discharges subject to section 402 of the Clean Water Act.
 - Irrigation return flows.
 - Material subject to the Atomic Energy Act.
 - Mining materials not removed from the ground as part of the extraction process.
 - (c) HWs are defined as solid wastes which:
 - Exhibit the characteristics of ignitability, corrosivity, reactivity, or toxicity (contain certain listed contaminates after solvent extraction); or

- Are a listed waste or contain a listed waste (EPA listed approximately 400 chemicals and 85 process wastes in the regulations).
- In addition, a waste may be declared hazardous by applying knowledge of the materials or the processes used.
- 2. HW generators are required to:
 - (a) Have notified EPA that they generate HW's, by 18 August 1980. All generators who notified EPA received an EPA identification number.
 - (b) Determine if wastes are HWs.
 - (c) Prepare HW shipments for transport in accordance with EPA/Department of Transportation (DOT) shipping regulations. Requirements for labeling and marking waste containers, and providing placards for transport vehicles are included in the regulations. Wastes stored temporarily (less than 90 days) outside of permitted storage facilities, must be placed in DOT shipping containers, or in storage tanks meeting storage facility requirements. The container must also be marked with the starting date of accumulation of waste. (NOTE: Personnel training, emergency equipment, and contingency plan requirements are the same for temporary storage as for permitted storage facilities.)
 - (d) Prepare manifests meeting EPA minimum requirements for HW destined for off-installation treatment, storage, or disposal (TSD) facilities. The receiving facility and the transporter must be designated on the manifest, and the generator must ensure that both the transporter and the receiving facility have EPA identification numbers and are properly permitted to receive the wastes being shipped. Manifest requirements apply to shipments of HW from one location to another wherever public highways or right-of-ways are used. Since there is no uniform manifest, a shore facility shipping HW across several states may have to prepare different manifests for each state.
 - (e) Prepare and submit an annual report of HW shipped offsite. Maintain records of HW analyses, copies of manifests, and exception reports (reports to EPA of failures to receive signed manifests from the designated TSD facility within 45 days).

- 3. Requirements for Transporters of HW.
 - (a) An EPA ID number must be obtained. The transporter becomes responsible for spill cleanup and for delivery of the entire quantity of HW to the designated TSD facility upon signing the manifest. Responsibility is transferred to the TSD facility only when the manifest is dated and signed by the authorized representative of the TSD facility.
 - (b) In the event of a discharge of HW, the transporter must take immediate action to protect human health and the environment (for example, notify Federal, state, and local authorities, and take action as required or approved by these authorities).
- 4. Requirements for Owners/Operators of HW TSD Facilities.
 - (a) Standards applicable to TSD facilities will be published in several phases. The first phase included interim status standards (40 CFR 265), effective until TSD facility permits are issued. It also includes some of the standards which will be included in the TSD facility permits, required under 40 CFR 264. Additional Part 264 standards will be published as they are developed for specific wastes and industries.
 - (b) Compliance with Federal standards does not override the requirement to comply with applicable state and local regulations. States will be awarded primacy for HW control upon demonstration to EPA that the state program is equivalent to the Federal program.
 - (c) Under the interim status standards, the following actions were required by 19 November 1980:
 - Put into effect a written waste analysis plan for detailed chemical and physical analysis of each waste sufficient to allow for proper treatment, storage and/or disposal of the waste. The TSD facility operator may require that this data be submitted by the generator, but the operator must be prepared to verify the data when necessary.
 - Follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and sump pumps) important in preventing, detecting, or responding to environmental or human health hazards.
 - Develop contingency plans. Existing contingency plans may require minor modifications.

- Develop written closure plans to identify the steps necessary to completely close the facility at any point during its intended life and at the end of its intended life. This requirement also applies to TSD facilities which are closed rather than upgraded to meet HW facility permit requirements. Plans must be submitted to EPA for approval not later than 180 days before the expected start of closure activities.
- Initiate operating records which describe wastes received for treatment, storage or disposal, waste location, dates of operation, results of analyses, emergency incident reports, and inspection and monitoring reports.
- Upgrade personnel records for personnel handling HW to include job title, job description, training requirements, and training received. All personnel must complete training requirements (either in the classroom or on the job) in routine and emergency HW management operations not later than mid-May 1981. New personnel hired after 19 November 1980 must complete training prior to working unsupervised with HW.
- Upgrade security in order to prevent the unknowing entry, and minimize the possibility for the unauthorized entry, of persons or livestock onto the active portions of the facility. This requirement may be satisfied if the facility or plant where the active portion of the TSD facility is located has its own surveillance system, or a barrier, and means to control entry.
- Provide emergency response facilities and equipment to ensure that employees have immediate access to internal alarm or communication systems, and that adequate emergency control equipment and water supplies are available.
- Ensure that uncovered tanks have at least two feet of freeboard, and for continuous waste feed operations, install waste feed cutoff or bypass mechanisms.
 Impoundments require at least two feet of freeboard and protective covers, such as grass, shale, or rock, to minimize wind and water erosion and to preserve their structural integrity.
- Submit Part A of the RCRA permit for HW facilities. Information required includes a topographic map extending at least one mile beyond property boundaries and showing facility outlines, locations of HW TSD facilities, springs, rivers, and other surface water bodies. Additionally, descriptions of the nature of HW

- Containers must be located at least 15 meters (50 feet) from the facility's property line.
- Wastes may not be placed in tanks, surface impoundments, land treatment, landfills, or treatment facilities unless the waste is treated before or immediately after placement so the resulting material no longer meets the definition of ignitable or reactive waste. Waste may be deposited in a tank or surface impoundment in an emergency.

C. Applicability to Naval Activities.

- The activity commander is the HW generator, transporter, and owner of TSD facilities. Individual facility managers are operators (i.e., PWC, NARF, DPDO, etc.)
- 2. By 19 August 1980, HW generators, transporters, and owner/operators of TSD facilities were to have applied for an EPA identification number and to have notified EPA of HW activities. After 19 November 1980, it is illegal to contract for removal of HW, to transport HW off the installation, or to operate HW TSD facilities, until an ID number is obtained.
- 3. Small quantity generator exception. Activities generating less than 1,000 kg/month of HW, or accumulating less than a total of 1,000 kg of HW, or generating less than 1 kg of a listed HW, or accumulating less than 100 kg of any residue or contaminated soil, water or other debris resulting from the cleanup of a spill, may qualify as a small quantity generator. Small quantity generators are subject to the HW regulations only in that they must determine if the waste is a HW, as specified in the KCRA regulations, and treat or dispose of the HW in a properly permitted on-site facility or ensure delivery to a properly permitted off-site facility. Wastes from tenant organizations must be included in installation totals.
- 4. HW sludges and listed HW which are intended for use, reuse, recycling, or reclamation are subject to the HW regulations, only in that they must be transported and stored as HW prior to their use. Other HW intended for use, reuse, recycling, or reclamation are not subject to the HW regulations; however, EPA intends to establish some controls in future regulations.
- V. Toxic Substances Control Act (TSCA).

This law, effective 1 January 1977, authorizes EPA to regulate chemicals used in commerce. The regulation covers manufacture, distribution, use, and disposal of any chemical substance. It was estimated that EPA would have jurisdiction over approximately 50,000 commercial chemicals manufactured or processed in 115,000 establishments in the United States. The following are some of the basic provisions of this legislation. activities; descriptions, and quantities of HW; and photographs and drawings of the facilities are required. Submission of Part B of the permit, which will include hydrogeology surveys, operating and other plans, and waste analyses, will be required six months after notification by EPA, which could occur six months to several years after submission of Part A.

- (d) Submit an annual report of HW activities. The annual report will include quantities and types of wastes received and processed, whether the HW was treated, stored and/or disposed and groundwater monitoring data. Groundwater monitoring applies only to those facilities that treat, store, or dispose of hazardous waste in surface impoundments, waste piles, land treatment units, or landfills.
- (e) The following actions were required by November 1981:
 - Install, operate, and maintain a groundwater monitoring system of at least four wells, one upgradient, for determining the facility's impact on the quality of groundwater in the uppermost acquifer underlying the facility. Separate monitoring systems for each waste management component of a facility are not required, provided that provisions for sampling upgradient and downgradient water quality will detect any discharge from the waste management area.
 - Develop and implement a groundwater sampling and analysis plan to include quarterly background sampling for one year. Continue reduced sampling frequencies after the first year.
 - Prepare an outline of a groundwater quality assessment program which would identify pollutant concentrations and the rate and extent of contaminant migration. Upon discovery and confirmation of significant increases of indicator parameters over background levels, EPA must be notified within seven days.
 - Upgrade landfills to provide for run-on diversion, runoff collection, and wind control. Place waste piles on an impermeable base and treat as if they were landfills, or provide protection from precipitation and run-on, and cease disposal of liquids and wastes containing free liquids in the pile.
- (f) RCRA makes management restrictions for HW containers, tanks, land treatment, incinerators, and other facilities. Special restrictions are established for management of ignitable and reactive HW:

- A. EPA was required to publish an inventory of all chemicals produced or processed in the United States, including location and volume. This inventory was published on 1 June 1979 and contained approximately 50,000 entries.
- B. EPA must be informed by a premanufacture notification 90 days before a new chemical is introduced into commerce. A new chemical is defined as any chemical not included in the inventory.
- C. Manufacturers and processors may be required to do additional testing if more information is required about a new chemical.
- D. Manufacturers and processors are required to maintain records concerning adverse health or environmental effects of their chemicals.
- E. EPA has the responsibility to control or eliminate Polychlorinated biphenyls (PCB's). EPA is now in the process of accomplishing this task.
- VI. Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980--The Superfund.

The purpose of this act is to assign liability, and provide compensation, cleanup, and emergency response for hazardous substances released into the environment and for the cleanup of inactive hazardous waste disposal sites. Although CERCLA funds are not available to Federal facilties, this law does affect the way those facilities operate, especially in the area of hazardous substance spills. The act requires a revision of the national contingency plan which was originally required by the Clean Water Act. The following new terms may result in new requirements in the national contingency plan:

A. Release.

Any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment. This excludes workplace exposure, release of various nuclear materials, and normal application of fertilizers.

B. Environment.

The navigable waters, waters of the contiguous zone, some ocean waters, other surface waters, ground waters, drinking water supply, land surface, subsurface strata, or the ambient air, within the United States, or under the jurisdiction of the United States.

C. Listed Hazardous Substance.

Any substance designated under sections 307(A) and 311(B)(2)(A) of the Clean Water Act, section 112 of the Clean Air Act, and section 7 of the Toxic Substances Control Act, and RCRA Hazardous Wastes.

D. Facility.

- Any building, structure, installation, equipment, pipe or pipeline, well, pit, pond, lagoon, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft.
- 2. Any site or area where a hazardous substance has been deposited, stored, disposed of or placed, or otherwise come to be located. This does not include any consumer product.
- E. A Reportable Spill.

Any release (other than a federally permitted release) into the environment of a listed hazardous substance in quantities equal to or greater than listed quantities.

VII. Clean Water Act.

- A. The basic objective of this act is to ensure that surface waters remain suitable for human uses. Congress has established some goals in the current legislation. They are:
 - 1. By July 1983, the waters of the United States will be clean to the point that they are "fishable" and "swimmable."
 - 2. By 1985, we will have no discharge of pollutants into the waters of the United States.

At this point, no one expects these goals to be met.

- B. The requirements of the Clean Water Act that apply to toxic/hazardous materials are:
 - 1. A permit system to provide a mechanism for regulating the pollutants discharged into water from a point source. At first, very few toxic substances were regulated by this mechanism. But then four environmental groups sued EPA for not controlling toxics properly. EPA lost the suit and the court required EPA to regulate 65 families of toxic chemicals by the permit system and by other provisions of the law.
 - 2. Hazardous substances spills.

The act requires the preparation of a National Contingency Plan for the removal of spilled oil and hazardous substances. The EPA has published a list designating "reportable quantities" of hazardous substances when they are spilled in water. The list has over 250 entries and the maximum that may be spilled without reporting varies from one to 5,000 pounds. (d) DEQPPM 81-3. This memorandum provides guidance on hazardous substance spill residue cleanup. The DOD component will fund and accomplish the hazardous substance spill residue cleanup, spill site restoration, and proper identification, packaging and labeling of spill residue; DLA will program and accomplish the disposal of properly identified, packaged, and labeled spill residues for FY83 and later years.

IX. Navy Regulations.

A. The Navy's environmental policy is set forth in OPNAVINST 5090 (formerly 6240.3E) which is the Environmental Protection and Natural Resources Manual. This manual promulgates Navy policy, identifies requirements and guidelines, and assigns responsibilities within the Navy for implementing a Navy-wide program for the protection of the environment, conservation of natural resources, and the preservation of cultural and historic resources.

The most important part of that instruction for hazardous waste handlers is Chapter 11, "Hazardous Materials Environmental Management Ashore." This Chapter identifies requirements and responsibilities applicable to the prevention and control of pollution from hazardous materials, including hazardous waste at Navy shore facilities. It is divided into three sections:

- 1. Hazardous Materials and Hazardous Waste Management
- 2. Inactive Hazardous Substance Disposal Sites
- 3. PCBs
- B. The OPNAVINST section on hazardous materials and waste management gives guidance on generation, transportation, storage, treatment, and disposal operations. It discusses how federal laws apply to Navy activities and lists specific requirements. It also mentions the Defense Logistic Agency's (DLA) role in hazardous substance disposal, the Navy's hazardous waste responsibilities as assigned by DOD, and the responsibilities of different Navy commands. The requirement for submission of the Annual HW Report by Naval facilities is set forth in OPNAVINST 5090.

X. Summary.

There are a great many laws, regulations, and policies concerning hazardous materials and hazardous wastes. Hazardous wastes are now tracked from "cradle to grave" and enforcement agencies and the public closely monitor all activities in this field. While handlers may not be directly involved in preparing manifests, developing reports, or completing other management tasks, their activities are linked to these legal requirements. Therefore, they should be concerned how their activities may affect another individual's ability to comply. Even though the activity commander is responsible for compliance, the handler can be prosecuted in cases of willful negligence.

VIII. Department of Defense (DOD) Regulations.

- A. DOD Consolidated Hazardous Material/Hazardous Waste Disposal Guidance. (June 1981) Refer to handout.
 - 1. This document summarizes guidance found in:
 - (a) Defense Environmental Quality Program Policy Memorandum (DEQPPM) 80-5. DEQPPM 80-5 states the DOD hazardous material disposal policy, which is to dispose of hazardous materials in an environmentally acceptable manner. It designates the DLA as the responsible agency within DOD for the worldwide disposal of all hazardous material (except for those categories of materials specifically designated for DOD component disposal). DEQPPM 80-5 also defines "Hazardous Material":

Material is hazardous when, because of its quantity, concentration, or physical, chemical, or infectious characteristics, it may: (a) cause or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating reversible illness; or (b) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

(b) DEQPPM 80-8. This memorandum provides policy guidance on DOD implementation of the hazardous waste management regulations of RCRA. DOD policy is:

To limit the generation of hazardous waste through alternative procurement practices; to reuse, reclaim or recycle resources where practical; to dispose of hazardous waste in an environmentally acceptable manner according to the disposal policy established in DEQPPM 80-5; and to implement EPA and/or state hazardous waste management regulations.

(c) DEQPPM 80-9. This memorandum provides guidance on the proper handling, storage, and disposal of PCBs. This policy includes:

Full compliance with EPA regulations on handling, storage, marking, and disposal of PCBs and PCB items; inventory all PCBs and PCB items in their accountability; establish inspection procedures for PCB transformers and other PCB equipment in storage; construct, as necessary, storage areas for PCBs and PCB items that are awaiting disposal; and develop and implement a program to educate appropriate personnel on the hazards of PCBs. An error or problem anywhere in the hazardous wastes system can create administrative and management problems all along the line. Thus, handlers must remember that they are part of a large, legally required management program and that the performance of their jobs may have a major effect on the ability of their activity to comply with laws and regulations.



CONSOLIDATED HAZARDOUS MATERIAL/HAZARDOUS WASTE DISPOSAL GUIDANCE JUNE 1981

I. Purpose:

This publication consolidates and further clarifies the operational instructions for implementation of DOD Hazardous Material/Hazardous Waste (HM/HW) disposal guidance and is for use at all DOD levels. This guidance is effective until further superseded, amended, or included in DOD 4160.21-M.

II. References:

A. Defense Environmental Quality Program Policy Memorandum (DEQPPM 80-5) subject: Department of Defense Hazardous Material Disposal Policy, dated 13 May 1980. This memorandum provides DOD policy guidance relative to disposal mission assignment and related responsibilities for hazardous materials.

B. Defense Environmental Quality Program Policy Memorandum (DEQPPM 80-8) subject: RCRA Hazardous Waste Management Regulations, dated 21 Oct 80. This memorandum publishes policy guidance to implement within the Department of Defense the hazardous waste management regulations of the Resource Conservation and Recovery Act (RCRA).

C. Defense Environmental Quality Program Policy Memorandum (DEQPPM 80-9) subject: Department of Defense (DOD) Management of Polychlorinated Biphenyls (PCBs) and PCB items, dated 10 Nov 80. This memorandum provides additional DOD guidance on the proper handling, storage, and disposal of the hazardous chemical PCB and PCB items.

D. This publication supersedes the messages listed in Appendix A.

E. Definitions and abbreviations applicable to the contents of this publication are provided in Appendix B.

III. Responsibilities:

A. DLA/DPDS

1. DLA has been designated by DEQPPM 80-5 (ref A) as the responsible agency within DOD for the worldwide disposal of all hazardous materials except those categories listed in paragraph IIIB below.

2. DLA has delegated operational responsibilities for this expanded mission to DPDS.

B. The DOD components are responsible for disposal of the following categories of property:

1. "Toxicological, biological, radiological, and lethal chemical warfare materials which, by U.S. law, must be destroyed. Disposal of the by-products of such material is the responsibility of the DOD component with assistance from DLA". 2. "Material which cannot be disposed of in its present form due to military regulations, e.g., consecrated religious items and cryptographic material." This category would include those instances where military regulations require the obliteration of all markings that could relate an excess material to its operational program. Once the appropriate actions are taken to meet the military regulation, the resulting material could then be turned in to the servicing DPDO.

3. "Municipal type garbage, trash, and refuse resulting from residential, institutional, commercial, agricultural, and community activities, which the facilities engineer or public works office routinely collects."

4. "Contractor generated materials which are the contractor's responsibility for disposal under the terms of the contract."

5. "Sludges resulting from municipal type wastewater treatment facilities."

6. "Sludges and residues generated as a result of industrial plant processes or operations." The services are responsible for disposal of sludges and residues resulting from industrial waste treatment facilities or for co-mingled materials resulting from industrial plant facilities which are accumulated into co-mingled storage for disposition in lieu of processing through industrial waste treatment facilities. DPDO's will accept all other segregrated generations of material from industrial plant processes or operations where the basic ingredients and contaminants are identified.

7. "Refuse and other discarded materials which result from mining, dredging, construction, and demolition operations."

8. "Unique wastes and residues of a non-recurring nature which research and development programs generate."

IV. DEQPPM 80-5 is being implemented in three phases:

A. Phase one (Turn-in procedures as of 1 November 1980).

1. The DPDO will accept the turn-in of all hazardous materials except for those categories outlined in paragraph IIIB above. The reutilization, transfer, donation, or sales potential of property is not criteria for acceptance by the DPDO. If the DPDO has the proper facilities, he will take physical custody along with accountability; if proper facilities are not available to the DPDO, then he will take accountability but not physical custody. Proper facilities will be determined based on the guidelines provided in paragraph VIA below.

2. Turn-in requirements are outlined in paragraph V below.

B. Phase two (existing service contracts).

1. As of FY 82, DPDS will assume responsibility for existing DOD component service contracts for disposal of material assigned to DPDS.

2. This material includes such things as the material routinely generated by an activity, but because of condition or physical characteristics or other factors, is being disposed of by existing DOD component service contracts since it was previously determined that the DPDO should not assume those responsibilities at that time.

C. Phase three (new service contracts). Pending complete implementation of phase two, in those cases where hazardous wastes are accumulated and the DOD component has no existing service contract, the turn-in activity will work with the servicing DPDO to assure timely removal. In most instances, arrangements can be made for the turn-in installation to provide contractual support utilizing DLA funds.

V. Turn-in Requirements:

A. Identification

1. Property must be identified by NSN, LSN, or FSC. Noun name is required with NSN. LSNs and FSCs must include complete description including manufacturers part number, if applicable.

2. Amount and type of contaminant must be identified.

3. Laboratory analysis is not required for turn-in of anything other than PCBs (see paragraph VIII.A). However, adequate information must be provided to permit valid identification of material and any contaminants being turned in. This information is required to preclude more costly identification measures and to insure prompt and environmentally acceptable disposal i hazardous material.

B. Packaging

1. Property turned in to the DPDO must be in containers that are non-leaking and safe-to-handle. The containers must be able to withstand normal handling or the turn-in will be rejected.

2. DOT specified containers are required for accumulation, storage, and movement of pre-determined hazardous wastes as listed in Appendix C. These wastes may also be accumulated in bulk in RCRA permitted facilities.

3. DOT specified containers are not required for turn-in to the DPDO of anything other than the predetermined hazardous wastes. The transporting agency does have a responsibility to comply with DOT requirements for transport over public highways.

C. Labeling

1. Property should be labeled in conformance with established criteria.

2. PCB marking requirements are specified in paragraph VIII A3.

D. Disposal Turn-In Document (DTID)

1. All property turned in to the DPDO will be done so with a properly prepared DTID. Standard procedures for preparation of a DTID are found in paragraph 5-5 of DOD 4160.17M, MILSTRIP.

2. The DTID will be modified/changed to satisfy internal DOD auditing requirements and shipping manifests as required by the EPA or State as follows:

3. Block A - "Shipped From": add telephone number and EPA identification number. Installations qualifying as RCRA defined "small generators" will enter "small generator exclusion" in lieu of the EPA identification number.

b. Block B - "Ship To": add telephone number and EPA identification number.

C. Block C - "Mark for" (normally left blank): insert HM (if turn in is hazardous material) or HW (if turn in is predetermined hazardous waste, as identified in Appendix C).

d. Block U - "Freight Classification Nomenclature": add six character (two alpha, four numeric) identification number as shown in 49 CFR, Part 172.

e. Block Y - Use this Block (in lieu of Blocks AA through EE) for the deposit account number. Note: This is not an entry required on behalf of hazardous material/waste documentation but a movement of data prescribed to permit use of the previously identified blocks for other purposes.

f. Blocks AA and BB: Use these two blocks for the transporter's name and EPA identification number.

g. Block CC - Have transporter (identified in Blocks AA and BB) sign and date for shipment received.

h. Blocks DD, EE, FF and GG - Insert the following statement in these blocks (note: Rubber stamp, typewritten or machine produced copy required): "This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of DOT and EPA". The turn-in activity will sign under the certification statement as the generator to comply with RCRA.

3. It is stressed that the information outlined in VD2 d, f, g, and h above is required only when transporting predetermined hazardous wastes (Appendix C) over public highways to a servicing DPDO. Other management actions taken to implement RCRA are described in paragraph VII.

4. Block 8 - The DPDO will sign and enter date. The signed copy of the DTID will serve as a valid receipt of both accountability and responsibility of the hazardous material or predetermined waste by the DPDO. For shipments within DoD (whether on the same installation or between installations) the turn-in activity's responsibility terminates upon receipt of the signed copy of the DTID which serves as the internal manifest between the generator and the servicing DPDO IAW DEQPPM 80-8 jurdance. VI. Physical Custody

A. Physical custody of hazardous materials/hazardous waste will be accepted if the DPDO has the proper facilities.

1. If the DPDO possesses conforming storage, the DPDO will accept physical custody at the time it accepts accountability.

2. If the DPDO does not possess conforming storage, and the generating activity has conforming storage in support of mission requirements, the generating activity will retain physical custody, and DPDO will accept accountability.

3. In those instances where neither DLA nor the generating activity possesses conforming storage, the activity with the "most nearly" conforming storage will accept or retain physical custody and the DPDO will accept accountability.

4. DLA will be responsible for the long term programming for conforming storage in support of its disposal mission.

B. Close coordination between the DPDO and host installations is required concerning physical receipt of hazardous property at the DPDO. Any unresolved issues will be expressed in writing through normal command channels.

C. DOD conforming storage. DLA/DPDS and the DOD components are working together to identify the conforming storage requirements for the disposal mission.

 DLA/DPDS will expedite determination of DPDO hazardous materials/hazardous waste storage requirements.

2. Each installation's total requirements for hazardous material/waste storage facilities will be jointly identified, and the most efficient means of providing such facilities will be determined through a coordinated DOD component/DLA team effort.

3. The DOD components will be requested to provide inputs and assistance for this effort in the near future.

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VII. Implementation of RCRA:

A. Permits

1. The installation commander is responsible to insure compliance with all RCRA requirements for the installation. The installation commander is also responsible to notify, to apply for permits, and to report to EPA or the State, as required, for all installation activities, including tenants.

2. The individual facility operational managers are accountable for conducting their activities in accordance with RCRA. Those facilities' managers, including tenants, will provide necessary documentation to the installation commander for permit applications, will provide to the installation commander reports required by EPA or the State, and will ensure compliance with RCRA regulations and permit requirements at that facility.

3. All reports to EPA or the State will be co-signed by the installation commander and facility operator or their designated official. The installation commander will sign as the owner and the facility manager (DPDO Chief) will sign as the operator.

B. Hazardous Waste Management Plan

1. Installation commander is responsible for developing and implementing a hazardous waste management plan to include all tenants on the installation. This plan shall identify and implement hazardous waste management actions required by RCRA.

2. All tenants will comply with applicable portions of the hazardous waste management plan and insure internal operational procedures are consistent.

3. The DPDO will insure inspections, safety precautions and actions, records, etc., as established in the installations hazardous waste management plan, are accomplished for hazardous waste for which he has accountability.

4. Required support or assistance that is available at the host installation will be provided to the DPDO upon request. When the costs warrant, reimbursement may be required.

C. Manifesting

1. The procedures for manifesting from a turn-in activity to a DPDO are outlined in paragraph IV D2.

2. DPDS is responsible, IAW DEQPPM 80-8, for advising DOD components as to which of the "used" hazardous materials, for which DLA has been assigned disposal responsibility, are to be controlled as a hazardous waste. DPDS has published a list of predetermined wastes as Appendix C. These pre-determined wastes are required to be managed as a hazardous waste upon generation. Only the property on this list, or subsequently identified by DPDS, is to be turned in to the DPDO identified as a hazardous waste, i.e., HW(paragraph VD2c.)

D. Recordkeeping and Reporting: (Reserved) VIII. Specific Item Turn-In Procedures:

A. Polychlorinated Biphenyls (PCB). DPDS is responsible for disposal of PCB fluids and materials contaminated with PCBs. The following turn-in requirements apply.

1. Properly identified as containing PCBs. A scientifically reliable analysis (DPDS prefers gas chromatograph) will accompany the DTID unless the property has a manufacturer's label or nameplate that indicates the presence of PCBs, e.g. generic or commercial name. The analysis will indicate the amount of PCB in parts per million (ppm) or in the following ranges:

a. Less than 50 ppm

b. 50-499 ppm

c. 500 ppm or more

Individual analysis is required for each item. DPDS may accept batch testing results on a case-by-case basis. However, approval for batch testing will be obtained from DPDS prior to turn-in.

2. Properly containerized. The property must be enclosed, nonleaking, and safe to handle. The DTID will be prepared in accordance with paragraph VD above.

3. The property must be marked as prescribed by the EPA in 40 CFR 761.44. Items containing 50 ppm or more PCB must be marked, with the exception of transformers. Only PCB transformers, 1.e. 500 ppm or more PCE, must be marked.

B. Asbestos. Friable asbestos will be packaged in accordance with Federal standards prior to being turned in to the DPDO.

C. Empty Containers (reserved paragraph).



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					MCB CAMP LEJ	LUNE, NC
WASTE MATERIAL	EPA WASTE NUMBER	DOT SHIPPING NAME	HAZARD CLASS	UN/NA NUMBER	DOT LABELS/ MARKINGS	DRUM TYPE
Acetic acid	D002	Waste, Acetic Acid	Corrosive Material	UN2790	Corrosive	17C/E ¹ or 34
Acetone	F003	Waste, Acetone	Flammable Liquid	UN1090	Flammable Liquid	17C/E
Activated charcoal	D002	Waste, Corrosive Liquid, n.o.s.	Corrosive Material	UN1760	Corrosive	17C/E ¹ or 34
Adhesive	D001	Waste, Adhesive	Flammable Liquid	UN1133	Flammable Liquid	17C/E
Adhesive	D001/F005	Waste, Adhesive	Flammable Liquid	UN1133	Flammable Liquid	17C/E
Adhesive	D001/F003/ F005	Waste, Adhesive	Flammable Liquid	UN1133	Flammable Liquid	17C/E
Adhesive primer	D001	Waste, Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Ammonium hydroxide	D002	Waste, Ammonium Hydroxide	Corrosive Material	NA2672	Corrosive	17C/E ¹ or 34
n-Amyl acetate	D001	Waste, Amyl Acetate	Flammable Liquid	UN1104	Flammable Liquid	17C/E
Antiseize compound	D008	Hazardous Waste, Liquid, n.o.s.	ORM-E	NA9189	ORM-E	
Asphalt adhesive	D001	Waste, Adhesive	Combustible Liquid	UN1133		
Battery acid	D002/D008	Waste, Battery Fluid, Acid	Corrosive Material	UN2796	Corrosive	34
Benzene	U019	Waste, Benzene	Flammable Liquid	UN1114	Flammable Liquid	17C
Benzoin tincture	D001	Waste, Ethyl Alcohol	Flammable Liquid	UN170	Flammable Liquid	17C
Bituminous coating compound	D001	Waste, Combustible Liquid, n.o.s.	Combustible Liquid	NA1993		
Blankarola	D001/F001	Waste, Naphtha Mixture (contains Perchloroethylene)	Flammable Liquid	UN2553	Flammable Liquid	17C/E
Blanket wash	D001/F001	Waste, Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Break-free, CLP	D001	Waste, Combustible Liquid, n.o.s.	Combustible Liquid	NA1993		
Brush plating solution	D002	Sodium Hydroxide, Solution	Corrosive Material	UN1824	Corrosive	17C/E ¹ or 34
Calcium hypochlorite	D001	Waste, Calcium Hypochlorite mixture	Oxidizer	UN1748	Oxidizer	17E/H
Carbon removing compound	D002	Waste, Corrosive Liquid, n.o.s.	Corrosive Material	UN1760	Corrosive	17C/E ¹ or 34

HAZARDOUS WASTE SUMMARY

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06/09/86			HAZARDOUS WASTE SU	MMARY		MCB CAMP LEJ	EUNE, NC
WASTE MATERIAL	EPA WASTE NUMBER	1 M	DOT SHIPPING NAME	HAZARD CLASS	UN/NA NUMBER	DOT LABELS/ MARKINGS	DRUM TYPE
Caustic soda	D002	Waste,	Sodium Hydroxide, Dry Solid	Corrosive Material	UN1823	Corrosive	2
Cement solvent	D001	Waste,	Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Charcoal lighter	D001	Waste,	Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Chlorination kit, water	D001	Waste,	Calcium Hypochlorite Mixture	Oxidizer	UN1748	Oxidizer	17E/H
Chloroform	U044	Waste,	Chloroform	ORM-A	UN1888	ORM-A	
Chromic acid	D002/D007	Waste,	Chromic Acid Solution	Corrosive Material	UN1755	Corrosive	17E ¹ or 34
Cleaning compound	D002	Waste,	Compound, Cleaning, Solution	Corrosive Material	NA1760	Corrosive	17E ¹ or 34
Cleaning compound, aluminum surface	D001/D002/ D005	Waste, Corr	Flammable Liquid, osive, n.o.s.	Flammable Liquid	UN2924	Flammable Liquid Corrosive	17C/E ¹ or 34
Cleaning solvent	F002	Waste,	Methylene Chloride	ORM-A	UN1593	ORM-A	
Cleaning solvent, Gentron 113	F001	Waste, tric	ORM-A, n.o.s. (contains chlorotrifluoroethane)	ORM-A	NA1693	ORM-A	
Coating compound (zinc chromate & phosphoric acid)	D001/D002/ D007	Waste, Corr	Flammable Liquid, cosive, n.o.s.	Flammable Liquid	NA2924	Flammable Liquid Corrosive	17C/E ¹ or 34
Coating compound (8030006647042)	D001	Waste,	Petroleum Distillate	Combustible Liquid	UN1268		
Contact adhesive	D001/F003/ F005	Waste,	Adhesive	Flammable Liquid	UN1133	Flammable Liquid	17C/E
Contact cement	D001/F003/ F005	Waste,	Cement	Flammable Liquid	NA1133	Flammable Liquid	17C/E
Corrosion preventive	D001/D007	Waste,	Combustible Liquid, n.o.s.	Combustible Liquid	NA1993		
Corrosion removing compound	D002	Waste,	Phosphoric Acid Solution	Corrosive Material	UN1805	Corrosive	17C/E ¹ or 34
Corrosion resistant	D002/D007	Waste,	Chromic Acid Solution	Corrosive Material	UN1755	Corrosive	17E ¹ or 34
Creosote	U051	Waste,	Combustible Liquid, n.o.s.	Combustible Liquid	NA1993		
Cutback asphalt	D001	Waste,	Asphalt Cut Back	Combustible Liquid	NA1999		

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HAZARDOUS WASTE SUMMARY

WASTE MATERIAL	EPA WASTE NUMBER	DOT SHIPPING NAME	HAZARD CLASS	UN/NA NUMBER	DOT LABELS/ MARKINGS	DRUM TYPE
Decontaminating agent (DS-2)	D002	Waste, Corrosive Liquid, n.o.s.	Corrosive Material	UN1760	Corrosive	17C/E ¹ or 34
Decontaminating agent (STB)	D002	Waste, Bleaching Powder	ORM-E	UN2208	ORM-E	
Deglazing solvent	F002	Waste, Methylene Chloride	ORM-A	UN1593	ORM-A	
Deicing-defrosting	D001	Waste, Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Denatured alcohol	D001	Waste, Denatured Alcohol	Flammable Liquid	NA1986	Flammable Liquid	17C/E
Dent filler (auto body filler) FP 98 ⁰ F	D001	Waste, Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Dent filler (bondo) FP 100°F	D001	Waste, Combustible Liquid, n.o.s.	Combustible Liquid	NA1993		
Dental amalgam	D009/D011	Hazardous Waste, Solid, n.o.s.	ORM-E	NA9189	ORM-E	
Dental resin	D001	Waste, Methyl Methacrylate Monomer Inhibited	Flammable Liquid	UN1247	Flammable Liquid	17C/E
Deodorant	U165	Waste, Naphthalene	ORM-A	UN1334	ORM-A	
Dichloromethane	U080	Waste, Dichloromethane	ORM-A	UN1593	ORM-A	
Dichromate cleaner	D002/D007	Waste, Compound, Cleaning, Liquid	Corrosive Material	NA1760	Corrosive	17C/E ¹ or 34
Diethylenetriamine	D002	Waste, Corrosive Liquid, n.o.s.	Corrosive Material	UN1760	Corrosive	17C/E ¹ or 34
Disinfectant	D001/D002	Waste, Flammable Liquid, Corrosive, n.o.s.	Flammable Liquid	UN2924	Flammable Liquid Corrosive	17C/E ¹ or 34
Drain cleaner	D002	Waste, Potassium Hydroxide, Dry Solid	Corrosive Material	UN1813	Corrosive	2
Dry cleaning solvent	D001	Waste, Combustible Liquid, n.o.s.	Combustible Liquid	NA1993		
Duplicating fluid	D001	Waste, Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Dursban	D001	Waste, Insecticide, n.o.s.	Flammable Liquid	NA1993	Flammable Liquid	17C/E
Electrolite kit	D002	Waste, Electrolyte (Acid) Battery Fluid	Corrosive Material	UN2796	Corrosive	34
Engine primer fuel	D001	Waste, Flammable Liquid, n.o.s.	Flammabel Liquid	UN1993	Flammable Liquid	17C/E



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HAZARDOUS WASTE SUMMARY

WASTE Material	EPA WASTE NUMBER	DOT SHIPPING NAME	HAZARD CLASS	UN/NA NUMBER	DOT LABELS/ MARKINGS	DRUM Type
Flight deck compound	D001/F005	Waste, Flammable Liquid, n.o.s. (contains xylene)	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Freon 11	U121	Hazardous Waste, Liquid, n.o.s. (contains trichloromonofluoromethe	ORM-E ane)	NA9189	ORM-E	
Fuel inhibitor	D001	Waste, Ethylene Glycol Monoethyl Ether	Combustible Liquid	UN1171		
Genetron 11	U121	Hazardous Waste, Liquid, n.o.s. (contains trichloromonofluorometha	ORM-E ane)	NA9189	ORM-E	
Glacial acetic acid	D002	Waste, Acetic Acid, Glacial	Corrosive Material	UN2789	Corrosive	17C/E ¹ or 34
Gum process	D002	Waste, Corrosive Liquid, n.o.s.	Corrosive Material	UN1760	Corrosive	17C/E ¹ or 34
Hydrazine	D003	Waste, Hydrazine, Aqueous Solution	Corrosive Material	UN2030	Corrosive	34
Hydrochloric acid	D002	Waste, Hydrochloric Acid	Corrosive Material	UN1789	Corrosive	34
Hydrogen peroxide	D001	Waste, Hydrogen Peroxide Solution	Oxidizer	UN2014	Oxidizer	4
Indicator solution	D001	Waste, Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Insect repellent	D001	Waste, Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Inspection penetrant	D001	Waste, Combustible Liquid, n.o.s.	Combustible Liquid	NA1993	·	
Insulating compound	D001/F003	Waste, Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Iso-octane	DOOL	Waste, Isooctane	Flammable Liquid	UN1262	Flammable Liquid	17C/E
Isopropyl alcohol	D001	Waste, Isopropyl Alcohol	Flammable Liquid	UN1219	Flammable Liquid	17C/E
Kerosene	D001	Waste, Kerosene	Combustible Liquid	UN1223		
Layout dye	D001	Waste, Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Lead nitrate	D001	Waste, Lead Nitrate	Oxidizer	UN1469	Oxidizer	4
Lead acid battery	D001/D008	Waste, Battery, Wet, Filled With Acid	Corrosive Material	UN2794	Corrosive	5
Leak detection dye, red	D001/F003	Waste, Flammable Liquid, n.o.s. (contains xylene)	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Lindane	U041	Waste, Lindane	ORM-A	NA2761	ORM-A	



WASTE MATERIAL	EPA WASTE NUMBER	DOT SHIPPING NAME	HAZARD CLASS	UN/NA NUMBER	DOT LABELS/ MARKINGS	DRUM TYPE
Lindane shampoo	U041	Waste, Lindane	ORM-A	NA2761	ORM-A	
Liquid cement	D001	Waste, Cement	Flammable Liquid	NA1133	Flammable Liquid	17C/E
Liquid paint	D001	Waste, Paint	Flammable Liquid	UN1263	Flammable Liquid	17C/E
Lithium battery	D003	Waste, Lithium Batteries, For Disposal	ORM-E		ORM-E	
Lithium nitrate	D001	Waste, Nitrate, n.o.s. (contains lithium nitrate)	Oxidizer	NA1477	Oxidizer	4
Lithographic blanket	F001	Waste, Tetrachloroethylene	ORM-A	UN1897	ORM-A	
Marking stencil ink	D001	Waste, Ink	Combustible Liquid	UN2867		
Mercury	U151	Waste, Mercury, Metallic	ORM-B	NA2809	ORM-B	
Mercury battery	D009	Hazardous Waste, Solid, n.o.s.	ORM-E	NA9189	ORM-E	
Methanol	FOOS	Waste, Methanol	Flammable Liquid	UN1230	Flammable Liquid	17C/E
Methyl ethyl ketone	F005	Waste, Methyl Ethyl Ketone	Flammable Liquid	UN1193	Flammable Liquid	17C/E
Methyl isobutyl ketone	F003	Waste, Flammable Liquid, n.o.s. (contains methyl isobutyl ketone)	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Methylene chloride	F001/F002	Waste, Methylene Chloride	ORM-A	UN1593	ORM-A	
Muriatic acid	. D002	Waste, Muriatic Acid	Corrosive Material	UN1789	Corrosive	34
Naphtha	D001	Waste, Naphtha	Flammable Liquid	UN2553	Flammable Liquid	17C/E
Nickel cadmium battery	D003					
Nitric acid	D002	Waste, Nitric Acid, 40% or less	Corrosive Material	NA1760	Corrosive	6
Nitric acid >40%	D001/D002	Waste, Nitric Acid	Oxidizer	UN2031	Oxidizer	6
Oven cleaner compound	D002	Waste, Compound, Cleaning, Liquid	Corrosive Material	NA1760	Corrosive	17C/E ¹ or 34

Paint wastes

Paint remover

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D001/D007/ D008

D002

Waste, Paint

Waste, Corrosive Liquid, n.o.s.

Corrosive Material

Flammable Liquid

NA1760

UN1263

Corrosive

Flammable Liquid

17C/E; 37A/B/C

17C/E¹ or 34

HAZARDOUS WASTE SUMMARY

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HAZARDOUS WASTE SUMMARY

WASTE MATERIAL	EPA WASTE NUMBER	DOT SHIPPING NAME	HAZARD CLASS	UN/NA NUMBER	DOT LABELS/ MARK INGS	DRUM TYPE
Paint thinners and solvents (xylene, toluene)	D001/F003/ F005	Waste, Paint Related Material (contains toluene, xylene)	Flammable Liquid	NA1263	Flammable Liquid	17C/E; 37A/B/C
PD-680 6850002649038, 6850002811985 and 68500028580	D001 D12	Waste, Petroleum Distillates	Combustible Liquid	UN1268		
Pentane	D001	Waste, Pentane	Flammable Liquid	UN1265	Flammable Liquid	17C/E
Photo bleach	D002	Waste, Acetic Acid	Corrosive Material	UN2790	Corrosive	17C/E ¹ or 34
Photo chemical kit 6750010186285	D001/F002	Waste, Compound Cleaning, Liquid (contains trichlorotrifluoroethane)	Flammable Liquid	NA1993	Flammable Liquid	17C/E
Photo chemical kit	U122	Waste, Formaldehyde Solution	ORM-A	UN2209	ORM-A	
Photo cleaner 6750006913822	D002/D007	Waste, Corrosive Liquid, n.o.s. (contains trichloroethane)	Corrosive Material	UN1760	Corrosive	17C/E ¹ or 34
Photo cleaner 6750010186285	D001/F001	Waste, Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Photo developer	D011	Hazardous Waste Solid, n.o.s.	ORM-E	NA9189	ORM-E	
Photo film	D011	Hazardous Waste Solid, n.o.s.	ORM-E.	NA9189	ORM-E	
Plastic polish	D001	Waste, Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Porcelain cleaning solution	D002	Waste, Compound, Cleaning, Liquid	Corrosive Material	NA1760	Corrosive	17C/E ¹ or 34
Potassium hydroxide	D002	Waste, Potassium Hydroxide Liquid	Corrosive Material	UN1814	Corrosive	17C/E ¹ 0r 34
Preservative coating	D001	Waste, Combustible Liquid, n.o.s.	Combustible Liquid	NA1993		
Primer coating	D001	Waste, Paint	Flammable Liquid	UN1263	Flammable Liquid	17C/E; 37A/B/C
Protective coating	D001/F005	Waste, Flammable Liquid, n.o.s. .(contains methyl ethyl ketone)	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Pyrethrum insecticide FP 100 ⁰ -140 ⁰ F	D001	Waste, Insecticide Liquid, n.o.s.	Combustible Liquid	NA1993		
Repair kit, tentage	D001/F003/ F005	Waste, Flammable Liquid, n.o.s. (contains acetone, toluene,	Flammable Liquid	UN1993	Flammable Liquid	17C/E



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HAZARDOUS WASTE SUMMARY

WASTE MATERIAL	EPA WASTE NUMBER	DOT SHIPPING NAME	HAZARD CLASS	UN/NA NUMBER	DOT LABELS/ MARKINGS	DRUM TYPE
Rifle cleaning compound	D001	Waste, Compound, Cleaning, Liquid	Combustible Liquid	NA1993		
Rubber cement	D001	Waste, Cement, Rubber	Flammable Liquid	NA1133	Flammable Liquid	17C/E
Rust arresting compound	D001/D008	Waste, Paint	Combustible Liquid	UN1263		
Rust removing compound	D002	Waste, Compound, Cleaning, Liquid (contains phosphoric acid)	Corrosive Material	NA1760	Corrosive	17C/E ¹ or 34
Scale removing compound	D002	Waste, Compound, Cleaning, Liquid (contains phosphoric acid)	Corrosive Material	NA1760	Corrosive	17C/E ¹ or 34
Sealing compound	D001/D005	Waste, Flammable Liquid, n.o.s. (contains methyl ethyl ketone)	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Silver nitrate	D001/D011	Waste, Silver Nitrate	Oxidizer	UN1493	Oxidizer	3
Soda lime	D002	Waste, Soda Lime, Solid	Corrosive Material	UN1907	Corrosive	2
Sodium hypochlorite (not more than 7% available chlorine by weight)	D001	Waste, Hypochlorite Solution	ORM-B	NA1791	ORM-B	
Solvent cement	D001/F003/ F005	Waste, Flammable Liquid, n.o.s. (contains acetone, toluene, naphtha cut)	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Soap bath, photo	D002	Waste, Acetic Acid	Corrosive Material	UN2790	Corrosive	17C/E ¹ or 34
Sulfuric acid	D002	Waste, Sulfuric Acid	Corrosive Material	UN1830	Corrosive	34
Sunscreen	D001	Waste, Flammable Liquid, n.o.s.	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Surface sealer	D001	Waste, Paint	Flammable Liquid	UN1263	Flammable Liquid	17C/E; 37A/B/C
Toluene	F005	Waste, Toluene	Flammable Liquid	UN1294	Flammable Liquid	17C/E
Toner	D001	Waste, Combustible Liquid, n.o.s.	· Combustible Liquid	NA1993		
Toner & dispersant	D001	Waste, Combustible Liquid, n.o.s.	Combustible Liquid	NA1993		
1,1,1-Trichloroethane	F002	Waste, 1,1,1-Trichloroethane	ORM-A	UN2831	ORM-A	
Trichloroethylene	F002	Waste, Trichloroethylene	ORM-A	UN1710	ORM-A	
Turpentine	D001	Waste, Turpentine	Flammable Liquid	UN1299	Flammable Liquid	17C/E



06/09/86		HAZARDOUS WASTE S	HAZARDOUS WASTE SUMMARY MCB CAMP LEJEUNE, NC			
WASTE MATERIAL	EPA WASTE NUMBER	DOT SHIPPING NAME	HAZARD CLASS	UN/NA NUMBER	DOT LABELS/ MARKINGS	DRUM TYPE
Type cleaner	F002	Waste,1,1,1-Trichloroethane	ORM-A	UN2831	ORM-A	
Varnish	D001	Waste, Paint	Flammable Liquid	UN1263	Flammable Liquid	17C/E; 37A/B/C
Walkway compound	D001	Waste, Paint	Flammable Liquid	UN1263	Flammable Liquid	17C/E; 37A/B/C
Windshield cleaning compound	D001/F003	Waste, Methanol	Flammable Liquid	UN1230	Flammable Liquid	17C/E
Wood filler	D001/F003/ F005	Waste, Flammable Liquid, n.o.s. (contains acetone, methyl ethyl ketone, toluene)	Flammable Liquid	UN1993	Flammable Liquid	17C/E
Xylene	F003	Waste, Xylene	Flammable Liquid	UN1307	Flammable Liquid	17C/E

1 Use plastic liner

² Use metal drum with plastic liner

3 See 49 CFR 173.244

4 Use metal drum

5 See 49 CFR 173.260(e)

6 See 49 CFR 173.268



			TAF	BLE 1		
UNLISTED	(0	HAR	ACTERI	STIC) HAZARDOUS	WASTES
(4	10	CFR	PART	261,	SUBPART C)	

	EPA HAZARDOUS WASTE NUMBER	CHAR- ACTER- ISTIC	CONTAMINANT	Maximum Concen- tration (mg/1)
	D001	I	Ignitability	
	D002	с	Corrosivity	
	D003	R	Reactivity	
	D004	т	Arsenic	5.0
	D005	т	Barium	100.0
	D006	т	Cadmium	1.0
	D007	т	Chromium	5.0
	D008	т	Lead	5.0
	D009	T	Mercury	0.2
•	D010	T	Selemium	1.0
	D011	T	Silver	5.0
	D012	T	Endrin (1,2,3,4,10,10-hexachloro-1,7-epoxy-	0.02
			1,4,4a,5,6,7,8,8a-octahydro-1,4-endo, endo-	
			5,8-dimethano naphthalene)	
	D013	T	Lindane (1,2,3,4,5,6-hexachlorocyclohexane,	0.4
			gamma isomer)	
	D014	T	Methoxychlor (1,1,1-Trichloro-2,2-bis [p-	10.0
			<pre>methoxyphenyl], ethane)</pre>	•
	D015	т	Toxaphene (C10H10Cl8, Technical chlorinated	0.5
			camphene, 67-69 percent chlorine)	
	D016	T	2,4-D, (2,4-Dichlorophenoxyacetic acid)	10.0
	D017	T	2,4,5-TP Silvex (2,4,5-Trichlorophenoxypropionic acid)	1.0



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EPA ZARDOUS 7	/	TABLE 2
WASTE	HAZARD	HAZARDOUS WASTE
40	T	The following spent halogenated solvents used in degreasing: Frue
11		tetrachloroethylene, methylene chloride, 1,1,1-trichloroethane,
1		mixtures/blends used in degreasing containing, before use, a total of ten
/		percent or more (by volume) of one or more of the above halogenated
/		solvents or those solvents listed in F002, F004 and F005 and still
	-	bottoms from the recovery of these spent solvents.
2	т	The following spent halogenated solvents: tetrachioroethylene, metny-
1		1.2-trichloro-1.2.2-trifluoroethane, ortho-dichlorobenzene, and trifluoro
1		methane; all spent solvent mixtures/blends containing, before use, a
1 .		total of ten percent or more (by volume) of one or more of the above
IA		halogenated solvents or those solvents listed in F001, F004, and F005; and
/ //		still bottoms from the recovery of these spent solvents and spent solvent
2		mixtures.
21	1	benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, euglo-
		hexanone, and methanol; all spent solvent mixtures/blends containing.
1		before use, only the above spent non-halogenated solvents; and all spent
		solvent mixtures/blends containing, before use, one or more of the above
		non-halogenated solvents, and, a total of ten percent or more (by volume)
		of one or more of those solvents listed in F001, F002, F004, and F005;
~		and still bottoms from the recovery of these spent solvents and spent
4)	т	The following spent non-halogenated solvents: cresols and cresulic acid, and
)		nitrobenzene; all spent solvent mixtures/blends containing, before use, a
		total of ten percent or more (by volume) of one or more of the above
		non-halogenated solvents or those solvents listed in F001, F002, and F005;
		and still bottoms from the recovery of these spent solvents and spent
-		solvent mixtures.
5	1,1	arbon disulfide isobutanol and puridines all sport columnt
		mixtures/blends containing, before use, a total of ten percent or more (by
		volume) or one or more of the above non-halogenated solvents or those
		solvents listed in F001, F002, and F004; and still bottoms from the recover
	1001	of these spent solvents and spent solvent mixtures.
0	T	wastewater treatment sludges from electroplating operations except from the
		plating on cathon steel: (3) ginc plating (segregated basis) on cathon
		steel: (4) aluminum or zinc-aluminum plating on carbon steel: (5)
		cleaning/stripping associated with tin, zinc and aluminum plating on carbon
		steel; and (6) chemical etching and milling of aluminum.
7	R,T	Spent cyanide plating bath solutions from electroplating.
8	R,T	Plating bath sludges from the bottom of plating baths from electroplating
9	R.T	Spent stripping and cleaning bath solutions from electroplating operations
	.,.	where evanides are used in the process.
0	R,T	Quenching bath sludge from oil baths from metal heat treating operations where
		cyanides are used in the process.
1	R,T	Spent cyanide solutions from salt bath pot cleaning from metal heat treating
•		operations.
4	T	tions where cuanides are used in the process
9	т	Wastewater treatment sludges from the chemical conversion coating of aluminum
Ő	H	Wastes (except wastewater and spent carbon from hydrogen chloride
		purification) from the production or manufacturing use (as a reactant,
		chemical intermediate, or component in a formulating process) of tri- or
		tetrachlorophenol, or of intermediates used to produce their pesticide
		derivatives. (This listing does not include wastes from the production of
1	Ч	Hexachiorophene from highly purified 2,4,5-trichlorophenol.).
•	n	purification) from the production or manufacturing use is a reactant
		chemical intermediate, or component in a formulating process) of
		pentachlorophenol, or of intermediates used to produce its derivatives.
2	Н	Wastes (except wastewater and spent carbon from hydrogen chloride
		purification) from the manufacturing use (as a reactant, chemical inter-
		mediate, or component in a formulating process) of tetra-, penta-, or
		hexachlorobenzenes under alkaline conditions.

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EPA HAZARDOUS		TABLE 2	
WASTE	HAZARD CODE		
NUMBER		HAZARDOUS WASTE	
F023	н	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production of materials on equipment previously used	
		for the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating program) of tria and	
		tetrachlorophenols. (This listing does not include wastes from equipment	
		used on for the production or use of Hexachlorophene from highly purified	
P024	m	2,4,5-trichlorophenol.).	
F024	т	wastes, including but not limited to, distillation residues, heavy ends, tars, and reactor cleanout wastes from the production of chloringted	
		aliphatic hydrocarbons, having carbon content from one to five, utilizing	
		free radical catalyzed processes.	
F025	т	Light ends, spent filters and filter aids, and spent dessicant wastes from the production of chlorinated aliphatic hydrocarbons, having carbon content from one to five, utilizing free radical catalyzed processes.	
F026	н	Wastes (except wastewater and spent carbon from hydrogen chloride	
		purification) from the production of materials on equipment previously used	
		for the manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tetra-, penta, or hexachlorobenzene	
F027	н	under alkaline conditions.	
		discarded unused formulation containing compounds derived from these	
		chlorophenols. (This listing does not include formulations containing	
		Hexachlorophene synthesized from prepurified 2,4,5-trichlorophenol as the	
F028	т	sole component.). Residues resulting from the incineration or thermal treatment of soil	
		contaminated with EPA Hazardous Waste Nos. F020, F021, F022, F023, F026, and	
		F027.	
Wood Preservatio			
KOO1	T	Bottom sediment sludge from the treatment of wastewaters from wood preserving	
		processes that use creosote and/or pentachlorophenol.	
Inorganic Pigmer	ts		
K002	т	Wastewater treatment sludge from the production of chrome yellow and orange	
		pigments.	
KUU3 KOO4	T	Wastewater treatment sludge from the production of molybdate orange pigments.	
K005	T	Wastewater treatment sludge from the production of zinc yellow pigments.	
K006	T	Wastewater treatment sludge from the production of chrome oxide green	
2007		pigments (anhydrous and hydrated).	
K007	T T	wastewater treatment sludge from the production of iron blue pigments.	
		oven residue from the production of chrome oxide green pigments.	
Organic Chemical	S		
K009	T	Distillation bottoms from the production of acetaldehyde from ethylene.	
K011	R,T	Bottom stream from the wastewater stripper in the production of acceleration of	
K013	R.T	Bottom stream from acetonitrile column in the production of acrylonitrile	
K014	T	Bottoms from the acetonitrile purification column in the production of acrylonitrile.	
K015	T	Still bottoms from the distillation of benzyl chloride.	
KUID	T	Heavy ends or distillation residues from the production or carbon	
K017	T	Heavy ends (still bottoms) from the purification column in the production	
K018	т	Heavy ends from the fractionation column in ethyl chloride production.	
K019	T	Heavy ends from the distillation of ethylene dichloride in ethylene dichloride production.	
K020	т	Heavy ends from the distillation of vinyl chloride in vinyl chloride monomer production.	
K021	T	Aqueous spent antimony catalyst waste from fluoromethanes production.	
K022 K023	T T	Distillation bottom tars from the production of phenol/acetone from cumene.	
NOLD	i salah sa	nabhalen.	
K024	T	Distillation bottoms from the production of phthalic anhydride from naphthalene.	
K093	т	Distillation light ends from the production of phthalic anhydride from ortho-xylene	
K094	т	Distillation bottoms from the production of phthalic anhydride from	
к025	т	ortno-xylene. Distillation bottoms from the production of nitrobenzene by the nitration	
K026	т	OF Denzene. Stripping still tails from the production of method athul puridings	
K027	т	Centrifuge and distillation residues from toluene diisocyanate production.	



EPA HAZARDOUS WASTE NUMBER	HAZARD CODE	TABLE 2 HAZARDOUS WASTE
K028	Т	Spent catalyst from the hydrochlorinator reactor in the production of 1,1,1- trichloroethane.
K029	т	Waste from the product steam stripper in the production of 1,1,1- trichloroethane.
K095	T	Distillation bottoms from the production of 1.1.1-trichloroethane.
K096	T	Heavy ends from the heavy ends column from the production of 1,1,1- trichloroethane.
к030	T	Column bottoms or heavy ends from the combined production of trichloroethylene and perchloroethylene.
K083	Т	Distillation bottoms from aniline production.
K103	T	Process residues from aniline extraction from the production of aniline.
K104	T	Combined wastewater streams generated from nitrobenzene/aniline production.
K085	T	Distillation or fractionation column bottoms from the production of chlorobenzenes.
K105	T	Separated aqueous stream from the reactor product washing step in the production of chlorobenzenes.
KIII	С,Т	Product washwaters from the production of dinitrotoluene via nitration of toluene.
K112	Т	Reaction by-product water from the drying column in the production of toluenediamine via hydrogenation of dinitrotoluene.
B113	Т	Condensed liquid light ends from the purification of toluenediamine in the production of toluenediamine via hydrogenation of dinitrotoluene.
K114	T	Vicinals from the purification of toluenediamine in the production of toluenediamine via hydrogenation of dinitrotoluene.
K115	T	Heavy ends from the purification of toluenediamine in the production of toluenediamine via hydrogenation of dinitrotoluone
K116	T	Organic condensate from the solvent recovery column in the production of toluene dilsocyanate via phosenation of toluenediamine.
K117	T	Wastewater from the reactor vent gas scrubber in the production of ethylene dibromide via bromination of ethene.
K118	T	Spent adsorbent solids from purification of ethylene dibromide in the production of ethylene dibromide use bromination of ethene
K136	T	Still bottoms from the purification of ethylene dibromide in the production of ethylene dibromide via bromination of ethene.
Inorganic Che	emicals	
KU/1	T	production, where separately prepurified brine is not used.
KU73	T	Chlorinated hydrocarbon waste from the purification step of the diaphragm cell process using graphite anodes in chlorine production.
K106	Τ.	Wastewater treatment sludge from the mercury cell process in chlorine production.
Pesticides		
K031	т	By-product salts generated in the production of MSMA and cacodylic acid
K032 K033	T	Wastewater and scrub water from the chloringtion of chlordane.
K034	Ţ	the production of chlordane.
		production of chlordane.
K097	T	Vacuum stripper discharge from the chlordane chlorinator in the production of chlordane.
K035	Т	Wastewater treatment sludges generated in the production of creosote.
K036	Т	Still bottoms from toluene reclamation distillation in the production of disulfoton.
K037	Т	Wastewater treatment sludges from the production of disulfoton.
K038	T	Wastewater from the washing and stripping of phorate production.
K039	Т	Filter cake from the filtration of diethylphosphorodithioic acid in the production of phorate.
K040	Т	Wastewater treatment sludge from the production of phorate.
K041	T	Wastewater treatment sludge from the production of toxaphene.
K098	T	Untreated process wastewater from the production of toxaphene.
K042	Т	Heavy ends or distillation residues from the distillation of tetra- chlorobenzene in the production of 2,4,5-T.
K043	Т	2,6-Dichlorophenol waste from the propduction of 2,4-D.
K099	T	Untreated wastewater from the production of 2,4-D.
N123	т	process wastewater (including supernates, filtrates, and washwaters) from the production of ethylenebisdithiocarbamic acid and its salts.
K124	С,Т	Reactor vent scrubber water from the prodcution of ethylenebisdithiocarbamic acid and its salts.
K125	Т	Filtration, evaporation, and centrifugation solids from the production of ethylenebisdithiocarbamic acid and its salts.
K126	T	Baghouse dust and floor sweepings in milling and packaging operations from the production or formulation of ethylenebisdithiocarbamic acid and its salts.



EPA		TABLE 2
HAZARDOUS		
WASTE	HAZARD	
NUMBER	CODE	HAZARDOUS WASTE
K044	R	Wastewater treatment sludges from the manufacturing and processing of
Salar and the second		explosives.
K045	R	Spent carbon from the treatment of wastewater contining explosives.
K046	т	Wastewater treatment sludges from the manufacturing, formulation and
K047	R	Pink/red water from TNT operations.
	No. Concernant	and the second second second second second second second second second second second second second second second
Petroleum Refin	ing	Discolud air flatation (DID) flact from the actual or affician
KU40	г	industry.
K049	T	Slop oil emulsion solids from the petroleum refining industry.
K050	T	Heat exchanger bundle cleaning sludge from the petroleum refining industry.
K051	T	API separator sludge from the petroleum refining industry.
K052	T	Tank bottoms (leaded) from the petroleum refining industry.
Iron and Steel		
K061	T	Emission control dust/sludge from the primary production of steel in electric furnaces
K062	C,T	Spent pickle liquor generated by steel finishing operations of plants
		that produce iron or steel.
Secondary Lead		
K069	T	Emission control dust/sludge from secondary lead smelting
1100	T	dust/sludge from secondary lead smelting.
Veterinary Phar	macoutical	
K084	T	Wastewater treatment sludges generated during the production of
		veterinary pharmaceticals from arsenic or organo-arsenic compounds.
K101	T	Distillation tar residues from the distillation of aniline-based compounds in the production of veterinary pharmaceuticals from
K10 2		arsenic or organo-arsenic compounds.
KIU2	r	production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.
Ink Formulation		
K086	T	Solvent washes and sludges, caustic washes and sludges, or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps, and stabilizers containing chromium and lead.
Coking		
K060	т	Ammonia still lime sludge from coking operations.
K087	T	Decanter tank tar sludge from coking operations.
P023		Acetaldehvde, chloro-
P002		Acetamide, N-(aminothioxomethyl)-
P057		Acetamide, 2-fluoro-
P058		Acetic Acid, Fuoro-, Sodium sait Acetimidic acid, N-[(methylcarbamovl)oxylthio-, methyl ester
P002		1-Acety1-2-thiourea
P003		Acrolein
P070		Aldicarb
P004 P005		Aldrin Allyl alcohol:
P006		Aluminmum phosphide
P007		5-(Aminomethyl)-3-isoxazolol
P008		4-aAminopyridine
P009 P119	R	Ammonium picrate Ammonium vanadate
P010		Arsenic acid
P012		Arsenic (III) oxide
P011		Arsenic (V). oxide
P011 P012		Arsenic pencoxide
P038		Arsine, diethyl-
P036		Arsonous dichloride, phenyl-
P054 P013		Aziridine Barium quanide
P024		Benzenamine, 4-chloro-
P077		Benzenamine, 4-nitro-
P028		Benzene, (chloromethyl)-
2042		1,2-Benzenedioi, 4-[nydroxy-2-(methylamino)ethyl]-

Plist vory dangerons



EPA HAZARDOUS		TABLE 2
WASTE NUMBER	HAZARD	HAZARDOUS WASTE
P046		
P014		Benzenethiol
P028		Benzyl chloride
P015		Beryllium dust
P016		Bis(chloromethyl) ether
P017		Bromoacetone
P018		Brucine
PU21 P123		Calcium cyanide
P103		Carbaninidoselencio acid
P022		Carbon bisulfile
P022		Carbon disulfide
P095		Carbonyl chloride
P023		Chloroacetaldehyde
P024		p-Chloroaniline
P029		Copper Cyanides
P030		Cyanides (soluble cyanide salts, not elsewhere specified
P033		Cyanogen chloride
P036		Dichlorophenvlarsine
P037		Dieldrin
P038		Diethylarsine
P041		Diethyl-p-nitrophenyl phosphate
P040		0,0-Diethyl 0-pyrazinyl phosphorothioate
P043		Diisopropyl fluorophosphate (DEP)
P004		<pre>1,4:5,8-Dimethanonaphthalene, 1,2,3,4,10,10-hexachloro- 1,4,4a,5,8,8a-hexahydro-,(lalpha,4alpha,4abeta,5alpha,8alpha,8abeta)-</pre>
P060		1,4:5,8-Dimethanonaphthalene, 1,2,3,4,10,10-hexachloro- 1,4,4a,5,8,8a-hexahydro-,(lalpha,4alpha,4abeta,5beta,8beta,8abeta)-
P037		2,7:3,6-Dimethanonaphth[2,3]oxirane, 3,4,5,6,9,9-hexachloro-
		<pre>la,2,2a,3,5,6a,7,7a-octahydro-, (laalpha,2beta,2aalpha,3beta,6beta,6aalpha, 7beta,7aalpha</pre>
P051		2,7:3,6-Dimethanonaphth[2,3b]Oxirane, octahydro-, (laalpha,2beta,2abeta,3alpha,
P044		Dimethoate
P045		3,3-Dimethyl-1-(methylthio)-2-butanone, 0-[(methylamino)carbonyl] oxime
P046		alpha, alpha-Dimethylphenethylamine
P047		4,6-Dinitro-o-cresol and salts
P048		2,4-Dinitrophenol
P020		Dinoseb
P085		Dipnosphoramide, octamethyl-
P049		2.4-Dithiobiuret
P050		Endosulfan
P088		Endothall
P051		Endrin
P042		Epinephrine
P054		Ethylenimine
P097		Famphur
P056		Fluorine
P057		Pluoroacetamide
P065	R.T	Fulminic acide, solum sait
P059	Contraction (Section	Heptachlor
P062		Hexaethyl tetraphosphate
P116		Hydrazinecarbothioamide
P068		Hydrazine, methyl-
P063		Hydrocyanic acid
P063		Hydrogen cyanide
P096		Tengunia acid mothul ester
P060		Isocyanic acid, methyl ester
P007		3(2H)-Isoxazolone, 5-(aminomethyl)-
P092		Mercury, (acetato-O)phenyl-
P065	R,T	Mercury fulminate
P082		Methamine, N-methyle-N-nitroso-
P016		Methane, oxybis(chloro-
P112	R	Methane, tetranitro-
P118		Methanethiol, trichloro-
P050		0,9-methano-2,4,3-Denzodioxathiepen, b,/,8,9,10-hexachlor- 1.5.5a,6.9.9a-bexabydro-, 3-oxide
P059		4,7-Methano-IH-indene, 1,4,5,6,7,8,8-heptachloro-3a,4,7,7a-tetrahudro-
P066		Methomy1
P067		2-Methylaziridine
P068		Methyl hydrazine
P064		Methyl isocyanate



EPA		TABLE 2
HAZARDOUS	HAZADD	
NUMBER	CODE	HAZARDOUS WASTE
P069		2-Methyllactonitrile
P071		Methyl parathion
P072		alpha-Naphthylthiourea
P073		Nickel carbonyl
P073		Nickel Carbonyl, (T-4)-
P076		Nitotine and sails
P077		P-Nitroaniline
P078		Nitrogen dioxide
P076		Nitrogen(II) oxide
P078		Nitrogen(IV) oxide
P081	R	Nitroglycerine
P082		N-Nitrosodimethylamine
P004 P074		N-Nitrosometnyivinyiamine
P085		Actamethylpurophosphorphide
P087		Osmie ny py tophosphorantee
P087		Osmium tetroxide
P088		7-Oxabicyclo[2,2,1]heptane-2,3-dicarboxylic acid
P089		Parathion
P034		Phenol, 2-cyclohexyl-4,6-dinitro-
P048		Phenol, 2,4-dinitro-
P047		Phenol, 2,4-dinitro-6-methyl-
P020		Phenol, 2,4-dinitro-6-(1-methylpropyl)-
P009	R	Phenol, 2,4,6-trinito- ammonium salt
P093		
P094		Phonate
P095		Phosaene
P096		Phosphine
P041		Phosphoric acid, diethyl p-nitrophenyl ester
P039		Phosphorodithioic acid, 0,0-diethyl S-[2-(ethylthio)ethyl] ester
P094		Phosphorodithioic acid, 0,0-diethyl S-[2-(ethylthio)methyl] ester
P089		Phosphorothioic acid, 0,0-diethyl 0-(p-nitrophenyl) ester
P040		Phosphorothiolc acid, 0,0-diethyl 0-pyrazinyl ester
2097		Phosphorothiolc acid, 0,0-dimethyl 0-[p-((dimethylamino)-sulfonyl)
P071		phenyijester
P110		Plumbane. tetraethul-
P098		Potassium cyanide
P099		Potassium silver cyanide
P070		Propanal, 2-methyl-2-(methylthio), 0-[(methylamino)carbonyl]oxime
P101		Propanenitrile
P027		Propanenitrile, 3-chloro-
P069		Propanenitrile, 2-hydroxy-2-methyl-
P001 P017	R	2-Bropanetriol, trinitrate-
P102		Proparate a lobol
P003		2-Propenal
P005		2-Propen-1-ol
P067		1,2-Propylenimine
P102		2-Propyn-1-ol
P008		4-Pyridinamine
PU/5		Pyridine, (S)-3-(1-methyl-2-pyrrolidinyl)-, and salts
P111 P103		Polonuras acid, tetraetnyi ester
P104		Silver (vanide
P105		Sodium azide
P106		Sodium cyanide
P107		Strontium sulfide
P108		Strychnidin-10-one, and salts
P018		Strychnidin-10-one, 2,3-dimethoxy-
P108		Strychnine and salts
P115		Sulfuric acid, thallium(1) salt
P110		Tetractnylaitniopyropnosphate
P111		Tetractuyi Idau
P112	R	Tetraitromethane
P062		Tetraphosphoric acid, hexaethyl ester
P113		Thallic oxide
P113		Thallium(III) oxide
P114		Thallium (I) selenite
P115		Thallium(I) sulfate
P109		Thiodiphosphoric acid, tetraethyl ester
P045		Thioranox
F049		ThioimidodiCarbonic dlamide


EPA		TABLE 2
HAZARDOUS		2019년 2019년 - 1월 2019년 1월 2019년 2019년 2019년 2019년 2019년 2019년 2019년 2019년 2019년 2019년 2019년 2019년 2019년 2019년 2
WASTE	HAZARD	
NUMBER	CODE	HAZARDOUS WASTE
P014		Thiophenol
P116		Thiosemicarbazide
P026		Thiourea, (2-chlorophenyl)-
P072		Thiourea, 1-naphthaleny1-
P093		Thiourea, phenyl-
P123		Toxaphene
P118		Trichloromethanethiol
P119		Vanadic acid, ammonium sait
P120		
P004		Virgiamine, N-methyi-N-nitroso-
P101		Zing curride
P122	R,T	Zinc phosphide, when present at concentrations greater than 10%
11001		Acatal debude
11034	1. A 1995 (1995)	Acetaldenyde
U187		Acetanide, N-(4-ethovynhenyl)-
U005		Acetamide, N-9H-fluoren-2-yl-
U112	I	Acetic acid, ethyl ester
U144		Acetic acid, lead salt
U214	I	Acetic acid, thallium salt
U002	I	Acetone
U003	I,T	Acetonitrile
U004		Acetophenone
U005		2-Acetylaminofluorene
U006 C,F	R,T Acetyl	chloride
U007		Acrylamide
U008	I	Acrylic acid
U009		Acrylonitrile
0011		Amitrole
0012	I,T	Aniline
0014		Auramine
0015		Azaserine
0010		<pre>azirino(2',3':3,4)pyrolo(1,2-a)indole-4,/-dlone, b-amino-8-[((aminocarbonyi) oxy)methyl]-1-1a,2,8,8a,8b-hexahydro-8a-methyoxy-5-methyl-</pre>
U157		Benz[j]aceanthrylene, 1,2-dihydro-3-methyl-
0016		3,4-Benzacridine
0017		Benzal Chloride
0192		Benzamide, 3,5,-dichioro-N-(1,1-dietnyl-2-propynyl)-
11004		Denzlajantniacene
11012	Τ.Ψ	Banzanamina
U014	-/-	Benzenamine, 4.4'-carbonimidovlbis(N.N-dimethyl-
U049		Benzenamine, 4-chloro-2-methyl-
U093		Benzenamine, N.N'-dimethyl-4-phenylazo-
U328		Benzenamine, 2-methyl-
U353		Benzenamine, 4-methyl-
U158		Benzenamine, 4,4'-methylenebis(2-chloro-
U222		Benzenamine, 2-methyl-, hydrochloride
U181		Benzenamine, 2-methyl-5-nitro
U019	I,T	Benzene
U038		Benzeneacetic acid, 4-chloro-alpha-(4-chlorophenyl)-alpha-hydroxy, ethyl ester
U030		Benzene, 1-bromo-4-phenoxy-
0035		Benzenebutanoic acid, 4-[bis(2-chloroethyl)amino]-
0037		Benzene, chloro-
0028		1,2-Benzenedicarboxylic acid, [bis(2-ethylhexyl)]ester
0069		1,2-Benzenedicarboxylic acid, dibutyl ester
0088		1,2-Benzenedicarboxylic acid, dietnyl ester
1107		1,2-Benzenedicarboxylic acid, dimetnyl ester
1070		Benzene 1 2-dichloro-
1071		Benzene 1 3-dichloro-
1072		Benzene, 1,4-dichloro-
U060		Benzene, 1,1'-(2,2-dichloroethylidene)bis[4-chloro-
U017		Benzene, (dichloromethyl)-
U223	R,T	Benzene, 1,3,-diisocyanathomethyl-
U239	I,T	Benzene, dimethyl-
U201		1,3-Benzenediol
U127		Benzene, hexachloro-
U056	I	Benzene, hexahydro-
U220		Benzene, methyl-
U105		Benzene, 1-methyl-1,2,4-dinitro-
U106		Benzene, 1-methyl-2,6-dinitro-
U055	I	Benzene,(1,methylethyl)-
U169	I,T	Benzene, nitro-
U183		Benzene, pentachloro-



EPA		TABLE 2
HAZARDOUS		
NUMBER	CODE	HAZARDOUS WASTE
U185		Benzene, pentachloro-nitro-
U020	C,R	Benzenesulfonic acid chloride
0020	C,R	Benzenesulfonyl chloride
0207		Benzene, 1,2,4,5-tetrachloro-
11247		Benzene, 1,1'-(2,2-dichloroetnylidene)Dig 4-chloro-
U023	C,R,T	Benzene, (trichloromethyl)-
U234	R,T	Benzene, 1,3,5-trinitro-
U021		Benzidine
U202		1,2-Benzisothiazolin-3-one, 1,1-dioxide
0203		1,3-Benzodloxole, 5-(2-propenyl)-
U090		1,3-Benzodioxole, 5-propy-
U064		Benzo(rst)pentaphene
U022		Benzo[a]pyrene
U197		p-Benzoquinone
0023	C,R,T	Benzotrichloride
0085	1,T	2,2'-Bloxirane
U073		(1,1') Biphenyl)-4,4'-diamine 3,3'-dichloro-
U091		(1,1'-Biphenyl)-4,4'-diamine, 3,3'-dimethoxy-
U095		(1,1'-Biphenyl)-4,4'-diamine, 3,3'-dimethyl-
U024		Bis(2-chloroethoxy) methane
0028		Bis(2-ethylhexyl) phthalate
0225		Bromolorm
U128		a Jonutatione, 1.1.2.3.4.4-bexachloro-
U172		1-Butanamine, N-buty1-N-nitroso-
U035		Butanoic acid 4-[Bis(2-chloroethyl)amino]benzene-
U031	I	1-Butanol
0159	I,T	2-Butanone
11053	R,T	2-Butanone peroxide
U074	I.T	2-Butene, 1.4-dichloro-
U143		2-Butenoic acid, 2-methyl-, 7-[(2,3-dihydroxy-2-(1-methoxyethyl)- 3-methyl-1-oxobutoxy)methyl]-2,3,5,7a-tetrahydro-1-pyrrolizin 1-yl ester, [15-[alpha(Z],(25,3R),7aalpha]]-
U031	I	n-Butyl alcohol
U032		Calcium chromate
U238		Carbamic acid, ethyl ester
U178		Carbamic acid, methylnitroso-,ethyl ester
0097		Carbamoyi chloride, dimethyi-
U062		Carbamothioic acid, his/-enanedyibis-saits and esters
U215	I	Carbonic acid, dithallium salt
U033	R,T	Carbonic fluoride
U156	I,T	Carbonochloridic acid, methyl ester
0033	R,T	Carbon oxyfluoride
1034		Chloral
0035		Chlorambucil
U036		Chlordane, technical
U026		Chlornaphazine
U037		Chlorobenzene
0039		4-Chloro-m-cresol
11042		I-Chloroethyl yinyl ether
U044		Chloroform
U046		Chloromethyl methyl ether
U047		beta-Chloronaphthalene
0048		o-Chlorophenol
1032		4-chloro-o-tolulalne, hydrochloride
U050		Chrysene
U051		Creosote
U052		Cresols (cresylic acid)
0053		Crotonaldehyde
0055	I	Cumeme
U197		1.4-Cvclohexadienedione
U056	I	Cyclohexane
U057	I	Cyclohexanone
U130		1,3-Cyclopentadiene, 1,2,3,4,5,5-hexachloro-
0058		Cyclophosphamide
0240		2,4-D, SAITS AND ESTERS



EPA HAZARDOUS WASTE	HAZARD	TABLE 2
NUMBER	CODE	HAZARDOUS WASTE
	All all all all all all all all all all	
0059		Daunomycin
U061		
U062		Diallate
U063		Dibenz[a,h]anthracene
U064		Dibenz[a,i]pyrene
U066		1,2-Dibromo-3-chloropropane
0069		Dibutyl phthalate
1070		S-(2,3-Dichloroally1)diisopropylthiocarbamate
U071		m-Dichlorobenzene
U072		p-Dichlorobenzene
U073		3,3'-Dichlorobenzidine
U074	I,T	1,4-Dichloro-2-butene
0075		Dichlorodifluoromethane
11079		1,1-DICHIOFOETNYLENE
U025		
U081		2,4-Dichlorophenol
U082		2,6-Dichlorophenol
U240		2,4-Dichlorophenoxyacetic acid, salts and esters
U083		1,2-Dichloropropane
0084		1,3-Dichloropropene
1108	1,т	1,2:3,4-Diepoxybutane
U086		N.N.Digethylbudzaging
U087		0.0-Diethyl-S-methyl-dithiophosphate
U088		Diethyl phthalate
U089		Diethylstilbestrol
U090		Dihydrosafrole
0091		3,3'-Dimethoxybenzidine
11093	1	
U094		7.12-Dimethylbenz(a)anthracene
U095		3,3'-Dimethylbenzidine
U096	R	alpha, alpha-Dimethylbenzylhydroperoxide
U097		Dimethylcarbamoyl chloride
0098		1,1-Dimethylhydrazine
U101		2.4-Dimethylphonol
U102		Dimethyl phthalate
U103		Dimethyl sulfate
U105		2,4-Dinitrotoluene
U106		2,6-Dinitrotoluene
0107		Di-n-octyl phthalate
U109		
U110	I	Dipropylamine
U111		Di-N-propylnitrosamine
U001	I	Bthanal
U174		Ethanamine, N-ethyl-N-nitroso-
0155		1,2-Ethanediamine, N,N-dimethyl-N-2-pyrindinyl-N'-(2-thienylmethyl)-
0087		Ethane 1 - dichloro-
U077		Ethane, 1,2-dichloro-
U131		Ethane, 1,1,1,2,2,2-hexachloro-
U024		Ethane, 1,1'-[methylenebis(oxy)]bis[2-chloro-
U117	I	Ethane, 1,1'-oxybis-
0025		Ethane, 1,1'-oxybis[2-chloro-
11208		Ethane, pentachioro-
U209		Bthane, 1,1,2,2-tetrachloro-
U218		Ethanethioamide
U227		Ethanol, 2-ethoxy-
U359		Ethanol, 2,2'-(nitrosoimino)bis-
0004		Ethanone, 1-phenyl-
11042		Ethene 2-chloroothowy
U078		Ethene, 1.1-dichloro-
U079		Ethene, trans-1,2-dichloro-
U210		Ethene, 1,1,2,2-tetrachloro-
U112	I	Ethyl acetate
U113	I	Ethyl acrylate
1038		Ethyl 4.4'-dichlorobengilato
U114		Ethylenebis(dithiocarbamic acid)



EPA		TABLE 2
HAZARDOUS		
WASTE	HAZARD	
NUMBER	CODE	INZANDOUS WASIE
11067		Phining dikensid
006/		Sthylene dipromide
0077		Ethylene dichioride
1115	т.т	Ethylene giycol monoethyl ethel
11116	-,-	Rthylene thioures
U117	T	
U076		Ethylidene dichloride
U118		Ethylmethacrylate
U119		Ethyl methanesulfonate
U120		Fluoranthene
U122		Formaldehyde
U123	C,T	Formic acid
U124	I	Furan
0125	I	2-Furancarboxaldehyde
0147	-	2,5-Furandione
U213 U125	÷	Furan, tetranyoro-
11124	Ť	
11206	-	D = G[uconvrance] - 2 - decvu - 2/3 - methul - 3 - nitroscureidc)
U126		Glucidylaldehyde
U163		Guanidine, N-nitroso-N-methyl-N'nitro-
U127		Hexachlorobenzene
U128		Hexachlorobutadiene
U129		Hexachlorocyclohexane (gamma isomer)
U130		Hexachlorocyclopentadiene
U131		hexachloroethane
U132		Hexachlorophene
U243		Hexachloropropene
0133	R,T	Hydrazine
0086		Hydrazine, 1,2-diectyl-
11000		Hydragine, 1,1-dimethyl-
11109		Hydrazine, 1,2-dimetryl-
U134	C.T	Hydrofluoric acid
U134	C.T	Hydrogen fluoride
U135		Hydrogen sulfide
U096	R	Hydroperoxide, 1-methyl-1-phenylethyl-
U136		hydroxydimethylarsine oxide
U116		2-Imidazolidinethione
U137		Indeno[1,2,3,-cd]pyrene
U139		Iron dextran
0140	I,T	Isobutyl alcohol
0141		Isosatrole
U142 U142		kepone
111 4 4		
111 46		Lead bis (acetato-0)tetrahydroxytri-
U145		Lead phosphate
U146		Lead subacetate
U129		Lindane
U147		Maleic anhydride
U148		Maleic hydrazide
U149		Malononitrile
U150		Melphalan
0151	No. of the second	Mercury
0152	1,T	Methacrylonitrile
0092	1	Methanamine, N-methyl-
0029	т т	Methane, bromo-
1046	1,1	Methane, chloromentoxy-
U068		Methane, dibromo-
U080		Methane, dichloro-
U075		Methane, dichlorodifluoro-
U138		Methane, iodo-
U119		Methanesulfonic acid, ethyl ester
U211		Methane, tetrachloro-
U121	and a start of the	Methane, trichlorofluoro-
0153	I,T	Methanethiol
0225		Methane, tribromo-
0044		Methane, trichlorofluoro-
11123	C	Methanoic acid
U154	T.	Methanol
U155	1990 - C	Methapyrilene
U142		1,3,4-Metheno-2H-cyclobuta(cd)pentalen-2-one, 1,1a,3,3a,4,5, 5,5a,5b,6-decachlorooctahydro-



EPA		TABLE 2
HAZARDOUS		
NUMBER	CODE	HAZARDOUS WASTE
U247		Methoxychlor
U154	I	Methyl alcohol
0029	-	Methyl bromide
0186	L T T	I-Methylbutadiene
11156	I,T I.T	Methyl chlorogarbonate
U226		Methylchloroform
U157		3-Methylcholanthrene
U158		4,4'-Methylenebis(2-chloroaniline)
U068		Methylene bromide
U080		Methylene chloride
U159	I,T	Methyl ethyl ketone
0160	R,T	Methyl ethyl ketone peroxide
0130	the second states and	Methyl lodide
11162	1	Methyl motharylato
U163	-,-	N-Mathul N'-nitro-N-nitrosoguanidine
U161	I	4-Methyl_2-pentanone
U164		Methylthiouracil
U010		Mitomycin C
U059		5,12-Naphthacenedione, (8S-cis)-8acety1-10-[(3-amino-2,3,6-trideoxy-
		alpha-L-lyxo-hexopyranosyl)oxyl]-7,8,9,10-tetrahydro-6,8,11-trihydroxy-1-
		methoxy-
U165		Naphthalene
0047		Naphthalene, 2-chloro-
0100		1,4-Naphthalenedione
0230		2,/~maphthaleneoisuitonic acid, 3,3'-(3,3'-dimethyl-(1,1'-biphenyl)
U166		-4,4 divijj-bis(5-amino-4-nydroxy)-, tetrasodium sait
U167		1-Naphthylamine
U168		2-Naphthylamine
U026		2-Naphthylamine, N,N'-bis(2-chloromethyl)-
U167		alpha-Naphthylamine
U168	- Sugar	beta-Naphthylamine
U217		Nitric acid, thallium(l+) salt
0026	11 Jac.	2-Naphthylamine, N,N'-bis(2-chloromethyl)-
0169	I,T	Nitrobenzene
U170 U171	т	
11172		
U173		
U174		N-Nitrosodiethylamine
U176		N-Nitroso-N-etĥylurea
U177		N-Nitroso-N-methylurea
U178		N-Nitroso-N-methylurethane
U179		N-Nitrosopiperidine
0180		N-Nitrosopyrrolidine
1103		5-Nitro-o-toluidine
0193		1,2-Oxachiolane, 2,2-dioxide
11115	ፐ . ጥ	Ovirane
U126	-/-	Oxi ranecarbonoxyaldebyde
U041		Oxirane, 2-(chloromethy)-
U182		Paraldehyde
U183		Pentachlorobenzene
U184		Pentachloroethane
0185		Pentachloronitrobenzene
0242		Pentachlorophenol
1187	1	1, 3-Pentadiene
11188		Phenacetin
U048		Phenol. 2-chloro-
U039		Phenol, 4-chloro-3-methyl-
U081		Phenol, 2,4-dichloro-
U082		Phenol, 2,6-dichloro-
U101		Phenol, 2,4-dimethyl-
0052		Phenol, methyl-
0132		Phenol, 2,2'-methylenebix[3,4,6-trichloro-
11242		Phenol, 4-nitro-
11212		Phenol, 2.3.4 6-tetrachloro-
U230		Phenol, 2,3,4,5-trichoro-
U231		Phenol, 2,4,6-trichloro-
U150		L-Phenylalanine, 4-[bis(2-chloroethyl)amino]-
U145		Phosphoric acid, Lead salt
U087		Phosphorodithioic acid, 0,0-diethyl, S-methyl ester



EPA HAZARDOUS		TABLE 2
WASTE NUMBER	HAZARD	HAZARDOUS WASTE
12.02. 200 -		
U247		Methoxychlor
U154	I	Methyl alcohol
U029		Methyl bromide
U186	I	1-Methylbutadiene
0045	I,T	Methyl chloride
11226	1,1	Methyl chlorocarbonate
U157		3-Methylcholanthrene
U158		4,4'-Methylenebis(2-chloroaniline)
U068		Methylene bromide
U080	S. D. State of the	Methylene chloride
0159	I,T	Methyl ethyl ketone
111 38	R,T	Methyl iodide
U161	I	Methyl isobutyl ketone
U162	I,T	Methyl methacrylate
U163		N-Methyl_N'-nitro-N-nitrosoguanidine
U161	I	4-Methyl-2-pentanone
U164		Methylthiouracil
0010		Mitomycin C
0039		alpha-L-lyxo-hexopyranosyl)oxyl]-7,8,9,10-tetrahydro-6,8,11-trihydroxy- methoxy-
U165		Naphthalene
U047		Naphthalene, 2-chloro-
U166		1,4-Naphthalenedione
0236		2,7-Naphthalenedisulfonic acid, 3,3'-[(3,3'-dimethyl-(1,1'-biphenyl) -4.4'divl)]-bis(5-amino-4-bydroxy)-, tetrasodium salt
U166		1,4-Naphthaguinone
U167		1-Naphthylamine
U168		2-Naphthylamine
U026		2-Naphthylamine, N,N'-bis(2-chloromethyl)-
0167		alpha-Naphthylamine
11217		Deta-Naphthylamine
U026		2-Naphthylamine, N.N'-bis(2-chloromethyl)-
U169	I,T	Nitrobenzene
U170		p-Nitrophenol
0171	I	2-Nitropropane
01/2		N-Nitrosodi-n-butylamine
0173		
U176		N-Nitroso-N-ethylurea
U177		N-Nitroso-N-methylurea
U178		N-Nitroso-N-methylurethane
U179		N-Nitrosopiperidine
0180		N-Nitrosopyrrolidine
11193		
U058		2H-1,3,2-Oxazaphosphorine, 2-[bis(2-chloroethyl)aminoltetrachydro-, oxide 2-
U115	I,T	Oxirane
U126		Oxiranecarbonoxyaldehyde
U041		Oxirane, 2-(chloromethyl)-
0182		Paraldenyde
U184		Pentachloroethane
U185		Pentachloronitrobenzene
U242		Pentachlorophenol
U188	I	1,3-Pentadiene
U187		Phenacetin
0188		Phenol 2.chloro-
0048		Phenol, 4-chloro-3-methyl-
U081		Phenol, 2,4-dichloro-
U082		Phenol, 2,6-dichloro-
U101		Phenol, 2,4-dimethyl-
0052		Phenol, methyl-
0132		Phenol, 2,2'-methyleneblx[3,4,6-trichloro-
11242		Phenol, pentachloro-
U212		Phenol, 2.3.4.6-tetrachloro-
U230		Phenol, 2,4,5-trichloro-
U231		Phenol, 2,4,6-trichloro-
U150		L-Phenylalanine, 4-[bis(2-chloroethyl)amino]-
U145		Phosphoric acid, Lead salt
0087		Phosphorodithioic acid, 0,0-diethyl, S-methyl ester



EPA		TABLE 2	
HAZARDOUS			
WASTE NUMBER	CODE	HAZARDOUS WASTE	
			A MAR AND
J189	R	Phosphorous sulfide	
1191		2-Picoline	
U179		Piperidine, 1-nitroso-	
U192		Pronamide	
U194	I,T	1-Propanamine	
U111		1-Propanamine, N-nitroso-N-propy1-	
U110	I	1-Propanamine, N-propy1-	
0066		Propane, 1,2-dibromo-3-chloro-	
0149		Propanedinitrile	
01/1		Propane, 2-nitro	
1193		1.3-Propane sultone	
U235		1-Propanol, 2.3-dibromo-, phosphate (3:1)	
U140	I.T	1-Propanol, 2-methyl-	
U002	I	2-Propanone	
U084		Propene, 1,3-dichloro-	
0007		2-Propenamide	
U243		1-Propene, 1,1,2,3,3,3-hexachloro-	
0009		2-Propenenitrile	
0152	1,T	2-Propenenitrile, 2-methyl-	
0008	I T	2-Propenoic acid other orter	
1118	+	2-Propendic acid, ethyl ester	
1162	Τ.Ψ	2-Propenoic acid, 2-methyl, methyl ester	
U233		Propionic acid, 2-(2,4,5-trichlorophenoxy)-	
U194	I,T	n-Propylamine	
0083		Propylene dichloride	
U148		3,6-Pyridazinedione, 1,2-dihydro-	
U196		Pyridine	
0191		Pyridine, 2-methyl-	
0237		2,4(1H,3H)-Pyrimidineodione, 5-[bis(2-chloroethyl)amin	no] -
0104		4(1H)-Pyrimidinone, 2,3-dinydro-6-metnyl-2-thioxo-	
1200		Pyriole, tetranydro-N-nitroso-	
U201		Resorcinol	
U202		Saccharin and salts	
U203		Safrole	
U204		Selenious acid	
U204		Selenium dioxide	
U205	R,T	Selenium disulfide	
0015		L-Serine, diazoacetate (ester)	
1233		Silvex	
1103		Sulfuric acid dimethyl actor	
1189	R	Sulfur phosphide	
U232		2.4.5-T	
U207		1,2,4,5-Tetrachlorobenzene	
J208		1,1,1,2-Tetrachloroethane	
U209		1,1,2,2-Tetrachloroethane	
J210 ·		Tetrachloroethylene	
J212		2,3,4,6-Tetrachlorophenol	
1213	I T	Tetrahydrofuran	
1215	I T	Thallium acetate	
1216	T	Thallium chloride	
J217	ī	Thallium nitrate	
U218		Thioacetamide	
J153	I,T	Thiomethanol	
J244		Thioperoxydicarbonic diamide, tetramethyl-	
J219		Thiourea	
J244		Thiram	
1220		Toluene	
1223		Toulenediamine	
1328	R,T	o-Toluidine	
J353		p-Toluidine	
J222		O-Toluidine hydrochloride	
J011		1H-1,2,4-Triazol-3-amine	
J226		1,1,1-Trichloroethane	
J227		1,1,2-Trichloroethane	
J228		Trichloroethylene	
J121		Trichloromonofluoromethane	
1230		2,4,5-Trichlorophenol	
1221		0.4.(mainting the second	



EPA HAZARDOUS	5		TABLE 2
WASTE		HAZARD	
NUMBER		CODE	HAZARDOUS WASTE
111.00			1.2 E-Maiouana 2.4 E toionthul
11225			Trioxane, 2,4,5-trimetnyi-
11236			Trunan blue
11237			Iracil 5 [big(2-chloromethyl)aminol-
U237			liracij mustard
U176			lirea. N-ethyl-N-nitroso-
U177			Urea, N-methyl-N-nitroso-
U043			Vinyl chloride
U248			Warfarin, when present at concentrations of 0.3% or less
U239		I	Xylene
U200			Yohimban-16-carboxylic acid, 11,17-dimethoxy-18 [(3,4,5- trimethoxy-benzoyl)oxy]-, methyl ester
U249			Zinc phosphide, when present at concentrations of 10% or less
U001		I	Ethanal
U002		I	2-Propanone
U002		I	Acetone
U003		I,T	Acetonitrile
U003		I,T	Ethanenitrile
U004			Acetophenone
U004			Ethanone, 1-pheny1-
U005			2-Acetylaminofluorene
0005	1		Acetamide, N-9H-fluoren-2-y1-
0006	C,R,T	Acetyl	chloride
0006	C,R,T	Ethanoy	yi chloride
0007			2-Propenande
0007		No. Constant	Acrylamide
1008		Ţ	Acruita said
0000		-	
1009			Acrupanitila
U010			Activino(2',3':3,4)pyrrolo(1,2-a)indole-4,7-dione, 6-amino-8-[((aminocarbonyl) oxy)methyl]-1-1a,2,8,8a,8b-beyabydro-8a-methyoyy-5-methyl-
U010			Mitomycin C
U011			1H-1,2,4-Triazo1-3-amine
U011			Amitrole
U012		I,T	Aniline
U012		I,T	Benzenamine
U014			Auramine
U014			Benzenamine, 4,4'-carbonimidoylbis(N,N-dimethyl-
U015			Azaserine
U015			L-Serine, diazoacetate (ester)
0016			3,4-Benzacridine
0016			Benz[c]acridine
0017			Benzal Chloride
0017			Benzene, (dichloromethyl)-
0018			1,2-Benzanthracene
0018			BenzlaJanthracene
0019		1,1	Benzene
11020		C,R	Benzenesultonic acid chioride
1021		C,R	(1) La Piphony La Aladiania
11021			(1,1 - Diplicity)-4,4 -Glamine Bangidina
11022			
U022			Benzola hurrene
U023		C.R.T	
U023		C.R.T	Benzene, (trichloromethyl)-
U024		0,,-	Bis(2-chloroethoxy) methane
U024			Ethane, 1.1'-[methylenebis(oxy)]bis[2-chloro-
U025			Dichloroethyl ether
U025			Ethane, 1,1'-oxybis(2-chloro-
U026			2-Naphthylamine, N.N'-bis(2-chloromethyl)-
U026			Chlornaphazine
U027			Bis(2-chloroisopropyl) ether
U027			Propane, 2,2'-oxybis(2-chloro-
U028			1,2-Benzenedicarboxylic acid, [bis(2-ethylhexyl)]ester
U028			Bis(2-ethylhexyl) phthalate
U029			Methane, bromo-
U029			Methyl bromide
U030			4-Bromophenyl phenyl ether
U030			Benzene, 1-bromo-4-phenoxy-
U031		I	1-Butanol
U031		I	n-Butyl alcohol
U032			Calcium chromate
U032			Chromic acid, calcium salt
U033		R,T	Carbon oxyfluoride



EPA		TABLE 2
HAZARDOUS		
WASTE	HAZARD	
NUMBER	CODE	HAZARDOUS WASTE
ALC: NO.	1998 1998 1998 1998 1998 1998 1998 1998	
U033	R,T	Carbonyl fluoride
U034		Acetaldehyde, trichloro-
U034		Chloral
U035		Butanoic acid 4-[Bis(2-chloroethy1)amino]benzene-
0035		Chlorambucil
0036		4,7-Methanoindan, 1,2,4,5,6,7,8,8-octachloro-3a,4,7,7a-tetrahydro-
0036		Chlordane, technical
0037		Benzene, Chloro-
0037		Chlorobenzene
0030		ethyl ester
11030		A-Chloro-marcol
1039		
U041		1-Chloro-2.3-epoxybropane
U041		Oxirane, 2-(chloromethyl)-
U042		2-Chloroethyl vinyl ether
U042		Ethene, 2-chloroethoxy-
U043		Ethene, chloro-
U043		Vinyl chloride
U044		Chloroform
U044		Methane, trichloro-
U045	I,T	Methane, chloro-
U045	I,T	Methyl chloride
U046		Chloromethyl methyl ether
0046		Methane, chloromentoxy-
0047		beta-Chloronaphthalene
0047		Naphthalene, 2-chloro-
0048		o-Chlorophenol
0048		Phenol, 2-chloro-
0049		4-Chloro-o-toluidine, hydrochloride
11050		- Pengenamine, 4-chioro-2-metnyi-
1050		L, 2-Denzphenanthrene
1051		
U052		
U052		Cresylie acid
U053		2-Butenal
U053		Crotonaldehyde
U055	I	Benzene, (1, methylethyl)-
U055	. I	Cumeme
U056	I	Benzene, hexahydro-
U056	I	Cyclohexane
U057	I	Cyclohexanone
U058		2H-1,3,2-Oxazaphosphorine, 2-[bis(2-chloroethyl)amino]tetrachydro-, oxide 2-
U058		Cyclophosphamide
0059		5,12-Naphthacenedione, (8S-cis)-8acety1-10-[(3-amino-2,3,6-trideoxy- alpha-L-1yxo-hexopyranosy1)oxy1]-7.8,9,10-tetrahydro-6,8,11-trihydroxy-1- methoxy-
U059		Dauromycin
U060		DDD
U060 .		Dichloro diphenyl dichloroethane
U061		DDT
U061		Dichloro diphenyl trichloroethane
U062		Diallate
U062		S-(2,3-Dichloroallyl)diisopropylthiocarbamate
U063		1,2:5,6-Dibenzanthracene
U063		Dibenz[a,h]anthracene
U064		1,2:7,8-Dibenzopyrene
0064		Dibenz[a,i]pyrene
0066		1,2-Dibromo-3-chloropropane
0066		Propane, 1,2-dibromo-3-chloro-
0067		Ethane, 1,2-dibromo-
0067		Ethylene dibromide
11068		Methane, GIDCOMO-
1069		neugrene Dromade
11069		Liz-benzenedicarboxyric acid, dibutyr ester
U070		Benzena. 1.2-dichloro-
U070		o-Dichlorobenzene
U071		Benzene, 1.3-dichloro-
U071		m-Dichlorobenzene
U072		Benzene, 1.4-dichloro-
U072		p-Dichlorobenzene
U073		(1,1'-Biphenyl)-4,4'-diamine, 3,3'-dichloro-
U073		3,3'-Dichlorobenzidine



EPA		TABLE 2
WASTE	HAZARD	
NUMBER	CODE	HAZARDOUS WASTE
11074	тт	1 A-Dichloro-2 buters
U074	1,1 1.T	2-Butene, 1.4-dichloro-
U075	-/-	Dichlorodifluoromethane
U075		Methane, dichlorodifluoro-
U076		Ethane, 1,1-dichloro-
U076		Ethylidene dichloride
0077		Ethane, 1,2-dichloro-
0077		Ethylene dichloride
11078		Ethene, l.l-dichloro-
U079		1.2-Dichloroethylene
U079		Ethene, trans-1,2-dichloro-
U080		Methane, dichloro-
U080		Methylene chloride
U081		2,4-Dichlorophenol
0081		Phenol, 2,4-dichloro-
11082		
U083		1,2-Dichloropropane
U083		Propylene dichloride
U084		1,3-Dichloropropene
U084		Propene, 1,3-dichloro-
U085	I,T	1,2:3,4-Diepoxybutane
0085	I,T	2,2'-BloxIrane
11087		N,N-Dietnyinyarazine
U087		Phosphorodithioic acid. 0.0-diethyl. S-methyl ester
U088		1,2-Benzenedicarboxylic acid, diethyl ester
U088		Diethyl phthalate
U088		Hydrazine, 1,2-diethyl-
U089		4,4'-Stilbenediol, alpha,alpha'-diethyl-
0089		Diethylstilbestrol
0090		Benzene, 1,2-methylenedloxy-4-propyl-
11091		(1,1)-Binbenul)-4.4'-diamine 3.3'-dimethovu-
U091		3.3'-Dimethoxybenzidine
U092	I	Dimethylamine
U092	I	Methanamine, N-methyl-
U093		Benzenamine, N,N'-dimethyl-4-phenylazo-
0093		Dimethylaminoazobenzene
0094		1,2-Benzanthracene, 7,12-dimethyl-
11095		(1.1'-Biphenul)-4 4'-diamine, 3.3'-dimethul-
U095		3.3'-Dimethylbazidine
U096	R	alpha, alpha-Dimethylbenzylhydroperoxide
U096	R	Hydroperoxide, 1-methyl-1-phenylethyl-
U097		Carbamoyl chloride, dimethyl-
0097		Dimethylcarbamoyl chloride
0098		1,1-Dimethylhydrazine
11099		Aydrazine, i,i-dimetryi-
U099		Hydrazine, 1.2-dimethyl-
U101		2,4-Dimethylphenol
U101		Phenol, 2,4-dimethyl-
U102		1,2-Benzenedicarboxylic acid, dimethyl ester
U102		Dimethyl phthalate
0103		Dimetnyi suirate
1105		2 4-Dinitrotoluene
U105		Benzene, 1-methyl-1.2.4-dinitro-
U106		2,6-Dinitrotoluene
U106		Benzene, 1-methyl-2,6-dinitro-
U107		1,2-Benzenedicarboxylic acid, di-n-octyl ester
U107		Di-n-octyl phthalate
0108		1,4-Diethylene dioxide
1100		1,4-Dioxane
U109		Hydrazine, 1,2-diphenyl-
U110	I	1-Propanamine, N-propyl-
U110	I	Dipropylamine
U111		Di-N-propylnitrosamine
U111		N-Nitroso-N-propylamine
U112	I	Acetic acid, ethyl ester
0112	Ĩ	stnyi acetate
0113	1	2-Propenoic acid, etnyl ester
0113		Benyi delytate



EPA HAZARDOUS		TABLE 2		
NUMBER	CODE	HAZARDOUS WASTE		
U114	Section 2	1.2-Ethanedivlbiscarbamodithioic acid		
U114		Ethylenebis(dithiocarbamic acid)		
U115	I,T	Ethylene oxide		
U115	I,T	Oxirane		
U116		2-Imidazolidinethione		
0116		Ethylene thiourea		
U117	Ť	Ethane, 1,1 -oxybis-		
U118	•	2-Propenoic acid, 2-methyl-, ethyl ester		
U118		Ethylmethacrylate		
U119		Ethyl methanesulfonate		
U119		Methanesulfonic acid, ethyl ester		
0120		Benzolj,kjfluorene		
U121		Methane, trichlorofluoro-		
U121		Methane, trichlorofluoro-		
U121		Trichloromonofluoromethane		
U122		Formaldehyde		
U122		Methylene oxide		
U123	C,T	Formic acid		
U123	C,T	Methanoic acid		
11124	I T	Furan		
U125	ī	2-Furancarboxaldehvde		
U125	ī	Furfural		
U126		1-Propanol, 2,3-epoxy-		
U126		Glycidylaldehyde		
U127		1-Butanamine, N-buty1-N-nitroso-		
U127 U127		Benzene, hexachloro-		
111 28		1 3-Butadiene 1 1 2 3 4 4-bevachlore		
U128		Hexachlorobutadiene		
U129	·	Hexachlorocyclohexane (gamma isomer)		
U129		Lindane		
U130		1,3-Cyclopentadiene, 1,2,3,4,5,5-hexachloro-		
0130		Hexachlorocyclopentadiene		
UI31 UI31		Ethane, 1,1,1,2,2,2-hexachloro-		
U132		2.2'-Methylenebis(3.4.6-trichlorophenol)		
U132		Hexachlorophene		
U133	R,T	Diamine		
U133	R,T	Hydrazine		
U134	C,T	Hydrofluoric acid		
UI 34 UI 25	C,T	Hydrogen fluoride		
U135		Sulfur bydride		
U136		Cacodylic acid		
U136		hydroxydimethylarsine oxide		
U137		1,10-(1,2-phenylene)pyrene		
U137		Indeno[1,2,3,-cd]pyrene		
U138 .		Methane, 10do-		
U130		Rerric devtran		
U139		Iron dextran		
U140	I,T	1-Propanol, 2-methyl-		
U140	I,T	Isobutyl alcohol		
U141		Benzene, 1,2-methylenedioxy-4-propenyl-		
U141		Isosafrole		
U142 U142		Decachiorooctahydro-1, 3, 4-metheno-2H-cyclobuta[c,d]-pentalen-2-one		
U143		Lasiocarpine		
U144		Acetic acid, lead salt		
U144		Lead acetate		
U145		Phosphoric acid, Lead salt		
U146		Lead subacetate		
U14/		2,5-Furandione		
U148		1.2-Dibydro-3.6-pyradizinedione		
U148		Maleic hydrazide		
U149		Malononitrile		
U149		Propanedinitrile		
U150		Alanine, 3-[p-bis(2-chloroethyl)amino]phenyl-, L-		
0150		Melphalan		
11152	T.T	2-Propenenitrile 2-methyl-		
U152	I,T	Methacrylonitrile		



EPA		TABLE 2	
WASTE	HAZARD		
NUMBER	CODE	HAZARDOUS WASTE	
U153	I,T	Methanethiol	
0153	1,1	Load phosphate	
11154	т	Methanol	
11154	Ť	Methyl alcohol	
11155	•	Methanyrilene	
U155		Pyridine, 2-[(2-(dimethylamino)-2-thenylamino]-	
U156	I,T	Carbonochloridic acid, methyl ester	
U156	I,T	Methyl chlorocarbonate	
U157	State Street	3-Methylcholanthrene	
U157		Benz[j]aceanthrylene, 1,2-dihydro-3-methyl-	
U158		4,4'-Methylenebis(2-chloroaniline)	
U158		Benzenamine, 4,4'-methylenebis(2-chloro-	
U159	I,T	2-Butanone	
U159	I,T	Methyl ethyl ketone	
U160	R,T	2-Butanone peroxide	
0160	R,T	Methyl ethyl ketone peroxide	
0161	I	4-Methyl-2-pentanone	
0161	I	Methyl isobutyl ketone	
0162	1,T	Methyl methacrylate	
0103		Guandine, N-nitroso-N-metnyl-N-nitro-	
11164		A(1H)-Burimidinone 2 2-dibudro-f-methul-2-thiovo-	
11164		Methylthiouracil	
U165		Naphthalene	
U166		1,4-Naphthalenedione	
U166		1,4-Naphthaguinone	
U167		1-Naphthylamine	
U167		alpha-Naphthylamine	
U168		2-Naphthylamine	
U168		beta-Naphthylamine	
U169	I,T	Benzene, nitro-	
U169	I,T	Nitrobenzene	
U170		p-Nitrophenol	
0170		Phenol, 4-nitro-	
0171	I	2-Nitropropane	
01/1	1	Propane, 2-nitro	
01/2		N-Nitrosodi-n-Dutylamine	
1173		N-Nitrosodiethanolamine	
U174		Ethanamine, N-ethyl-N-nitroso-	
U174		N-Nitrosodiethylamine	
U176		Carbamide, N-ethyl-N-nitroso-	
U176		N-Nitroso-N-ethylurea	
U177		Carbamide, N-methyl-N-nitroso-	
U177		N-Nitroso-N-methylurea	
U178		Carbamic acid, methylnitroso-, ethyl ester	
U178		N-Nitroso-N-methylurethane	
U179		N-Nitrosopiperidine	
0179		Pyridine, hexahydro-N-nitroso-	
0180		N-Nitrosopyrrolidine	
0180		Fyrrole, tetranydro-N-nitroso-	
U101 U101		Bonzenamine 2-methyl-5-nitro	
11192		1 3 5-Triovane 2 4 5-trimethul-	
U182		Paraldehyde	
U183		Benzene, pentachloro-	
U183		Pentachlorobenzene	
U184		Ethane, pentachloro-	
U184		Pentachloroethane	
U185		Benzene, pentachloro-nitro-	
U185		Pentachloronitrobenzene	
U186	I	l-Methylbutadiene	
U187		Acetamide, N-(4-ethoxyphenyl)-	
0187		Phenacetin	
0188		Benzene, hydroxy-	
0188		Phenol	
0100	1	I, J-Pentadiene	
111.90	R	Sulfur phoenbide	
111 00	ĸ	1 2-Benzenedicarboxulic acid ashud-ide	
111 90		Dhthalic anhydride	
11191		2-Picoline	
U191		Pyridine, 2-methyl-	
U192		3.5-Dichloro-N-(1,1-dimethy1-2-propynyl)benzamide	
U192		Pronamide	



UN 7 NDDOUIO		TABLE 2
WASTE	HAZARD	
NUMBER	CODE	HAZARDOUS WASTE
A Providence of the		
193		1,2-Oxathiolane, 2,2-dioxide
193	and the same of the same	1,3-Propane sultone
194	1,T	1-Propanamine
94	1,1	n-Propylamine
.90		Pyriaine
97		1,4-Cyclonexadlenedione
.97		Potenzodu Tilone
200		Reserving and 11 17-dimethovy-19 (/2 4 5-
.00		trimethoxy-benzoyl)oxy]-, methyl ester
101		1,3-Benzenedioi
101		Resorcinol
02		1,2-Benzisothiazolin-3-one, 1,1-dioxide
02		Saccharin and saits
03		Benzene, 1,2-metnytenedloxy-4-ally1-
04		Sollorious paid
04		
05	DT	
05	D T	
06	K,1	D-Clucopurances 2-docyu-2/2-mothul-2-mitrosouroido)
06		Stratogradosia
07		1.2.4.5-Tetrachlorobenzene
07		Benzene, 1.2.4.5-tetrachloro-
08		1.1.2. Petrachorothane
08		Ethane, 1,1,1,2-tetrachloro-
09		1.1.2.2-Tetrachloroethane
09		Ethane, 1.1.2.2-tetrachloro-
10		Ethene, 1.1.2.2-tetrachloro-
10		Tetrachloroethylene
11		Carbon tetrachloride
11		Methane, tetrachloro-
12		Phenol, 2,3,4,6-tetrachloro-
13 .	I	Furan, tetrahydro-
13	I	Tetrahydrofuran
14	I	Acetic acid, thallium salt
14	I	Thallium acetate
15	I	Carbonic acid, dithallium salt
15	I	Thallium carbonate
16	I	Thallium chloride
17	I	Thallium nitrate
18		Ethanethioamide
18		Thioacetamide
19		Carbamide, thio-
19		Thiourea
20		Benzene, methyl-
20		Toluene
21		Diaminotoluene
21		Toulenediamine
22		Benzenamine, 2-methyl-, hydrochloride
22	Second Law	O-Toluidine hydrochloride
23	R,T	Benzene, 1,3,-dlisocyanathomethyl-
23	R,T	Toluene diisocyanate
25		Bromororm
25		Methane, tribromo-
20		1,1,1-TIChloroethane
20		Metnyichioriorm
27		
28		Trial crostere
28		Trichloroethulene
30		Phenol. 2.4.5-trichloro-
31		2.4.6-Trichlorophenol
31		Phenol. 2.4.6-trichloro-
32		2.4.5-Trichlorophenoxyacetic acid
33		Propionic acid, 2-(2,4,5-trichlorophenovy)-
34	R.T	Benzene, 1,3,5-trinitro-
34	R.T	sym-Trinitrobenzene
35		1-Propanol, 2,3-dibromo-, phosphate (3:1)
35		Tris(2,3-dibromopropyl)phosphate
236		2,7-Naphthalenedisulfonic acid, 3,3'-[(3,3'-dimethyl-(1,1'-biphenyl)
1000		-4,4'diyl)]-bis(5-amino-4-hydroxy)-, tetrasodium salt
36		Trypan blue
37		Uracil mustard
27		Uracil, 5[bis(2-chloromethyl)amino]-
.37		



EPA HAZARDOUS	TABLE 2					
WASTE NUMBER	HAZARD	HAZARDOUS WASTE				
U238		Ethyl carbamate (urethan)				
U239	I	Xylene				
U239	I,T	Benzene, dimethyl-				
U240		2,4-D, salts and esters				
U240		2,4-Dichlorophenoxyacetic acid, salts and esters				
U243		1-Propene, 1,1,2,3,3,3-hexachloro-				
U243		Hexachloropropene				
U244		Bis(dimethylthiocarbamoyl) disulfide				
U244		Thiram				
U246		Bromine cyanide				
U246		Cyanogen bromide				
U247		Ethane, 1,1,1-trichloro-2,2-bis(p-methyoxy-phenyl)				
U247		Methoxychlor				
U248		3(alpha-Acetonylbenzyl)-4-hydroxycoumarin and salts when present at concentrations of 0.3% or less				
U248		Warfarin, when present at concentrations of 0.3% or less				
U249		Zinc phosphide, when present at concentrations of 10% or less				



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3.0 REQUIREMENTS FOR GENERATORS

In order to ensure the proper management of all hazardous wastes generated by Marine Corps Base (MCB) Camp Lejeune, the following requirements will apply to all generators of hazardous waste. These requirements are a compilation of the waste management requirements established by the State of North Carolina and the U.S. Environmental Protection Agency.

Because these requirements are derived from regulations that are specific and detailed, discretion should be limited. The success of the MCB Camp Lejeune HM/HW Management Plan is substantially dependent upon each generator identifying all hazardous wastes generated, determining the appropriate handling method as described in this Section, and following the procedures outlined in this Plan. A generator is defined as each major command (Marine Corps Base, 2nd Division, 2nd FSSG, Naval Regional Medical Center, MCAS) which produces a hazardous waste. Each generator is responsible for the waste management activities of all individual groups (generating work centers) within the major command. Due to the importance of the coordination of waste activities between the generators and the Assistant Chief of Staff, Facilities, a Hazardous Material Disposal Coordinator (HMDC) will be designated by each generator to act as liaison for waste management activities. Each regiment, MAG, or separate battalion or company within each major command will designate a Hazardous Material Disposal Officer (HMDO) to coordinate HM/HW management activities for all generating work centers within his particular regiment, MAG, or separate battalion or company. Natural Resources and Environmental Affairs Division (NREAD) will provide training for the HMDO's and the HMDC's and assist in the establishment of site-specific waste management protocols for each generator.

3.1 Waste Identification Procedures

The HMDO's will have the responsibility for submitting to the appropriate HMDC a Waste Information Document (WID) for each type of material/waste to be discarded. A single WID may apply



to many containers of material/waste, generated over an extended period, so long as the character of that material/waste is constant. Materials to be discarded include a material which has served its intended purpose, has exceeded its shelf life, or is no longer needed at the facility and also includes sludges, process wastes, etc. The WID form and instruction sheet are shown in Figure 3-1. It is important that the WID be completed as thoroughly and accurately as possible and that any other pertinent information which will assist in the determination of the appropriate handling method be attached.

If the generator can not identify the material/waste, a request for waste characterization by NREAD may be made by completing Item 5 of the WID. That request must be endorsed by the HMDC and provide an account to which analytical costs mayt be charged. The WID should include any information regarding the waste which would assist NREAD in performing a literature search to determine the chemical composition and associated hazards of the waste, determining the appropriate sampling method and the analyses to be performed, and/or supplying an adequate data base to evaluate the appropriate handling method of the waste. NREAD has the responsibility for providing the necessary laboratory tests to identify the wastes, if needed. A copy of the laboratory analysis, if applicable, will then be forwarded to the HMDO. After NREAD has identified the material/waste and submitted the information to the HMDO, the HMDO must submit a WID to the HMDC. It is important for the HMDO to indicate on the WID the dates waste characterization was requested and completed.

The HMDO's are responsible for maintaining accurate WID information on file with the HMDC's. If there is a significant change in a waste stream (e.g., waste mixture, physical form), the HMDO must file an amended WID with the HMDC. The amended WID must contain the WID number of the waste and the nature of the changes in the waste. The HMDC will re-evaluate the waste stream and return a copy of the completed WID to the HMDO.



FIGURE 3-1 WASTE INFORMATION DOCUMENT (WID)

		DATE	
		WID #	Renegative ge
GENERATING WORK CENTER INFORMAT	ION		
Shop Contact	Code Comman	d Building	Phone Ext
WASTE IDENTIFICATION			
A. WASTE NAME: Common	Chemical(s	.)	
B. PHYSICAL FORM: (CHECK)	Liquid Solid	Sludge Other (Specify)
C. MANUFACTURER:	D. NAT	IONAL STOCK NUMBER:	
E. CONTAINER: (TYPE AND SIZE)			
F. GENERATION RATE: (e.g., gal	/day, lbs/day)		
G. FREQUENCY OF GENERATION			
H. EXPECTED ANNUAL GENERATION:	(GALS, LBS)		
I. DESCRIBE WASTE GENERATION PF	ROCESS:		
J. HAS WASTE BEEN MIXED WITH AN	W OTHER MATERIAL?	Yes No If ye	es, specify
			222
			add the first
REASON FOR DISPOSAL: (CHECK)			
Exceeded shelf life Ser	ved intended purpose	Unused Othe	r (specify)
CERTIFICATION: I certify that t the waste containers listed abov	the above named materia we and have not been mi	ls are the only comp xed with any other m	ounds in aterials.
	HMDO	Code	Date
	Signature		
A. REQUEST FOR WASTE CHARACTERI the above waste. NREAD assi may be charged to this Accou	ZATION BY NREAD: I am stance is requested. nnt Code:	unable to properly The cost of waste an	classify alysis
B. REQUEST ENDORSEMENT:	HMDC Signature	Code	Date

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TO BE COMPLETED BY THE HMDC AND COPIES SENT TO THE HMDO AND DRMO

DATE WASTE CLASSIFICATION COMPL	LETED:	
WASTE CLASSIFICATION: Haza	ardous Nonhazardous	
EPA WASTE NUMBER(S):		
REASON FOR HAZARD CLASSIFICATIO		
HANDLING INSTRUCTIONS:		
DTID 1348-1 REQUIRED: Yes	No	
CONTAINER AND LABELING REQUIRE	MENTS:	
A. DOT/DOD CONTAINER TYPE:		
B. DOT PROPER SHIPPING NAME:		
C. DOT HAZARD CLASS:		A State State
D. UN/NA NUMBER:		
E. ADDITIONAL REQUIREMENTS: ((FOR DRMO)	
		A
SPECIAL PRECAUTIONS AND/OR INST	RUCTIONS:	

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GENERAL INSTRUCTIONS

Indicate the date on which the form is completed. The WID # will be assigned by the HMDC's. Items 1-5A must be completed by the HMDO. Where information is unknown or not applicable indicate accordingly.

- 1. GENERATING WORK CENTER INFORMATION: self-explanatory
- 2. WASTE IDENTIFICATION:
 - A. Waste Name Give common or brand name and chemical composition if known
 - B. Physical Form self-explanatory
 - C. Manufacturer As shown on label
 - D. National Stock Number self-explanatory
 - E. Container Indicate type and size container in which waste is presently stored (i.e., 55-gallon drum, plastic container, fiberboard box)
 - F. Generation Rate Indicate the most frequent rate of generation (quantity per day, week, month, year)
 - G. Frequency of Generation How often and length of time generated (i.e., 8 hrs/day, 7 days/week; 1 day/month; sporadic; one time only)
 - H. Expected Annual Generation self-explanatory
 - I. Describe Waste Generation Process Explain the process which results in waste generation in sufficient detail to assist in waste identification
 - J. Waste Mixture self-explanatory
- 3. REASON FOR DISPOSAL: self-explanatory
- 4. CERTIFICATION: WID must be signed by the HMDO



5 A. REQUEST FOR WASTE CHARACTERIZATION: If the waste cannot be properly classified by the HMDO, NREAD assistance may be requested by providing an Account Code to which the cost of laboratory analyses will be charged.

WID INSTRUCTIONS FOR HMDC'S

5. B. REQUEST ENDORSEMENT: Any request for NREAD assistance must be endorsed by the HMDC.

6. DATE WASTE CLASSIFICATION COMPLETED: self-explanatory

7. WASTE CLASSIFICATION: Refer to Section 4.1 (Waste Analysis Plan) of the HM/HW Management Plan

8. EPA WASTE NUMBER(S): e.g., D001, F005; refer to Table 4-1
(Waste Analysis Plan) of the HM/HW Management Plan

9. REASON FOR HAZARD CLASSIFICATION: e.g., ignitable, reactive; refer to Table 4-7 (Waste Analysis Plan) of the HM/HW Management Plan

10. HANDLING INSTRUCTIONS: e.g., store in generating work center TCA, contact TMO for transport to HW storage facility; acceptable for disposal in dumpster

11. DTID 1348-1 REQUIRED: self-explanatory

12. CONTAINER AND LABELING REQUIREMENTS: Refer to Section 6.0 (Shipping and Transportation) of the HM/HW Management Plan

13. SPECIAL PRECAUTIONS AND/OR INSTRUCTIONS: e.g., waste(s) and/or material(s) which are incompatible with waste; special safety equipment required for the waste; emergency response procedures

NOTE: Figure 3-2 has been deleted.



3.2 Requirements for Accumulation of Wastes in Containers A container is any portable device in which a material is stored, transported, treated, disposed of, or otherwise handled. The containers used to accumulate and store wastes at MCB Camp Lejeune will include 55-gallon steel drums, fiber drums, cardboard boxes, and wooden crates depending upon the chemical and physical properties of the waste, the generation rate, and the proposed storage, treatment and/or disposal method. The HMDC's will determine the appropriate container for each waste stream, specify the container on the appropriate WID, and assist the HMDO in obtaining the required container. In addition, each container of waste must be marked with a container identification number. This number should consist of the following: generating work center activity account code (i.e., M93058, V09167)-the WID number (the unique number assigned each waste stream by the HMDC)-generating work center container number (a sequential number assigned by the HMDO). An example of an identification number is M93058-BASE10-3 which means that Base Maintenance generated the waste identified on WID#BASE10 and that the waste was placed in the third container used to store hazardous waste at Base Maintenance.

Hazardous wastes must be collected in the containers specified by the HMDC's immediately after they are generated. Some wastes may be generated in small quantities (a few gallons per day) and may be mixed with other compatible wastes. In this event, the following segregation scheme should be followed.

All containers storing hazardous waste must be kept closed except when necessary to add or remove waste. The containers must be in good condition, having no dents or corrosion and tight fitting closure rings on drums. The containers must be opened, closed, and handled in a manner to prevent rupture or leakage of the container.

The generating work centers will prepare and submit a Form DD 1348-1 (see Appendix 3-1) for each HW container within 45 days of



the accumulation start date to the appropriate HMDO. The HMDO will inspect the container and make a determination of the accuracy of the information on the Form DD 1348-1 and the suitability of the container. The HMDO will initiate action to correct problems encountered and will request Preservation, Packaging and Packing (PP&P) support if required. The HMDO or his designee will hand carry the Form DD 1348-1 to DRMO at Building 906. If DRMO determines that DRMO can accept accountability for the waste, DRMO will inspect the item and sign the Form DD 1348-1 accepting accountability. DRMO will forward the form to the Traffic Management Officer (TMO) along with a written request for TMO to arrange transportation of the item to the permitted container storage facility. TMO will determine if the generating unit can legally and safely transport the item to the permitted storage facility. If TMO determines that the command can transport the item, TMO will arrange a satisfactory delivery time with DRMO and the appropriate HMDO.

3.2.1 Segregation of Small Quantities of Waste

Small quantities of waste may be mixed in a single container by <u>categories</u>. The segregation of small quantities of waste by category will ensure that incompatible chemicals are not mixed. Each category of mixed wastes has been assigned a color code to simplify its use. Color coding may be accomplished by painting the entire drum, a portion of the drum, or use of colored labels. If mixtures of hazardous wastes are being created at the generating work centers, each component of the mixture and an estimate of quantity must be entered on the Hazardous Waste Generation Summary Log (see Figure 3-3) at the work center and identified on a WID submitted to the HMDC.

Categories of mixed waste created by this plan are:

- Specification used oil fuel: Color Code Yellow
 a. petroleum based lubricating oils (uncontaminated)
 - b. petroleum based hydraulic and automatic
 - transmission fluids (not contaminated with freon)



FIGURE 3-3 HAZARDOUS WASTE GENERATION

WORK CENTER:_____

SUMMARY LOG ACTIVITY ACCOUNT CODE:___

WID + - CONTAINER NUMBER	ACCUMU- LATION START DATE	WAST	TE(S) ADDED	DATE			
		WASTE NAME	QUANTITY	DATE ADDED	INITIALS	OUT	DESTINATION
			1				
The second							
	1						
				are and			
			the second				

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- c. diesel and kerosene fuels (uncontaminated)
- d. certain other petroleum products (low metal content, low halogen content, moderate flash point, see exclusions in Appendix G of Used Oil Management Plan)
- 2. Off specification used oil: Color Code Yellow and Black
 - chemical or synthetic based lubricating oil, hydraulic or transmission fluid
 - b. contaminated petroleum based lubricating oil, hydraulic or transmission fluid (includes dirt and water sludges as well as halogenated and metal and low flash contaminants).
 - c. jet fuels, gasoline and other low flash petroleum
 - d. skimmings from oil/water separators.
- 3. Solvents nonhalogenated: Color Code Red
 - a. PD-680 Type I (or Type II if flash point is 140 F or less)
 - b. toluene
 - c. methyl ethyl ketone (MEK)
 - d. naphtha
 - e. xylene
 - f. paint thinners (containing no paint wastes)
 - g. mineral spirits
 - h. other nonhalogenated solvents

Nonhalogenated solvents are those which do not contain chlorides, fluorides, or bromides. If unknown, check with the HMDC.

4. Solvents - halogenated:

Color Code White

- a. methylene chloride
- b. trichloroethane
- c. trichloroethylene
- d. freon
- e. carbon tetrachloride
- f. other halogenated solvents



Some products contain both halogenated and nonhalogenated solvents. These should be placed in the "solvents-halogenated" category. Never place caustic materials in this category as toxic fumes may result.

5. Mixed Paint Wastes: / Color Code Blue

- a. paint sludges
- b. paint scrapings
- c. paint strippers (nonhalogenated)
- d. contaminated paint thinners

6. Battery Acid: Color Code Pink

Battery acid shall be drained from cracked or leaking vehicle batteries only. Acid shall not be drained from intact batteries.

The management of used oils, both specification and off specification, is included in a separate document entitled Used Oil Management Plan (UOMP). Management procedures for the other categories of waste are summarized below.

If the above segregation plan is implemented, all other wastes should be placed in individual containers without mixing. If additional or different mixtures are desired, approval for mixing must be obtained from the HMDC.

A Hazardous Waste Generation Summary Log (see Figure 3-3) must be maintained by each generating work center. Entries on that record will include the container identification number, the accumulation start date, the name of the waste material, the quantity of waste added to the drum, date additional waste was added to the container (small quantity mixtures), the initials of the person adding the waste, the date the container is transferred out of the work station, and its destination (e.g., TCA, HW storage, off-site TSD).



3.2.2 Container Labeling Requirements

Each container must be clearly labeled with the words "Hazardous Waste" and clearly marked with the accumulation start date, the date on which waste was first placed in the container. Preprinted hazardous waste warning labels are available from NREAD. An example label is shown in Figure 3-4. Additional information required on the label including the proper DOT shipping name, UN/NA#, and EPA waste number will be specified on the WID. All entries on the label must be made using an indelible marker. DRMO will add the manifest document number to all containers which are manifested off-site for treatment or disposal.

3.2.3 Temporary Collection Area (TCA) Requirements

Once a container of waste from a generating work center has been transferred to a TCA, the HMDO or his designee must enter the waste on the Temporary Collection Area Storage Record which is shown in Figure 3-5. Entries on that record include the waste name, container identification number, accumulation start date, quantity, date received at the TCA, date transferred out of the TCA, and the destination of the waste (HW storage facility or off-site). The HMDO will ensure that each container of hazardous waste is, at all times, positioned so that the hazardous waste label with accumulation start date is clearly visible for inspection.

Wastes stored in TCA's must be segregated in a fashion that will prevent incompatible wastes mixing in the event of a spill or leak. Containers of ignitable or reactive wastes must be located at all times at least 50 feet from the MCB Camp Lejeune property line. Sufficient aisle space must be maintained around all hazardous waste containers to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area where hazardous waste is located. Signs reading "Danger--Unauthorized Personnel Keep Out" must be posted on the entrances to the TCA's in a size legible from a distance of 25 feet. In addition "No Smoking or



HAZA	RDOUS
WΔ	STE
FEDERAL LAW PROHI	BITS IMPROPER DISPOSAL
IF FOUND, CONTACT PUBLIC SAFETY U.S. ENVIRONMENT	THE NEAREST POLICE, OR AUTHORITY, OR THE AL PROTECTION AGENCY
PROPER D.O.T SHIPPING NAME SEE NOTE 2	2 UN OR NA#
GENERATOR INFORMATION: NAME SEE NOTE 3 SEE NOTE 4	
CITY	STATE ZIP
EPA SEE NOTE 5	EPA SEE NOTE 2
ACCUMULATION OF NOTE	MANIFEST

FIGURE 3-4

C LABELMASTER CHICAGO. IL. 60626

SEE NOTE 1



- NOTE 1: Damaged labels will be immediately replaced, using same information as on original label. If original label illegible, contact your Hazardous Material Disposal Coordinator for guidance.
- NOTE 2: Obtain this information from your HW Standard Operating Procedure.
- NOTE 3: Enter the name of the organization having physical custody of the HW at the time the label is placed on the container, unless replacing a damaged label. See Note 1 above.
- NOTE 4: Enter either "MCAS, New River, Jacksonville" for HW generated aboard or by organizations stationed aboard the Marine Corps Air Station, New River. Enter "Marine Corps Base, Camp Lejeune" for all other HW.
- NOTE 5: Enter NC8170022570 for all waste generated aboard or by organizations stationed aboard MCAS, New River. Enter NC6170022580 for all other HW generated within the Camp Lejeune complex.
- NOTE 6: Enter the date that HW is first placed in the container. unless the facility has written authorization from CG, MCB, Camp Lejeune to operate as a HW satellite accumulation area. In which case, follow instructions provided within the written authorization.
- NOTE 7: Leave blank, will be completed by the Traffic Management Officer, Camp Lejeune.



FIGURE 3-5 TEMPORARY COLLECTION AREA STORAGE RECORD

GENERATING

WORK CENTER:

WASTE NAME	CONTAINER IDENTIFICATION NUMBER	ACCUMU- LATION START DATE	QUANTITY	DATE	DATE	DESTINATION
<u>Press</u>						
	+					
					a Press	
					at Link at	
		1			1. A.	
<u></u>						
	- Andrewski - Andrewski - Andrewski - Andrewski - Andrewski - Andrewski - Andrewski - Andrewski - Andrewski - A					
				1000		
	A CONTRACTOR					
					1.00	



Open Flame" signs must also be posted in the TCA. All means of access to each TCA must be kept locked except to add or remove containers. The HMDO or his designee will maintain keys to that area.

The HMDO or his designee will inspect the TCA's weekly looking for leaks, container condition, compatibility/segregation of wastes, required labels, aisle space and the 90-day accumulation period compliance. An example of a Hazardous Waste Weekly Inspection Record is shown in Figure 3-6. This record should identify the items to be inspected (items may vary with each generating work center), and provide space for the date and time of the inspection, the name of the inspector, observations made, and the date and nature of any corrective actions taken as a result of the inspection.

SAFETY MEASURES FOR TEMPORARY COLLECTION AREAS

- a. The area must be equipped with an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel.
- b. A device, such as a telephone or hand-held two-way radio, which is capable of summoning emergency assistance from security, fire department, and emergency response teams must be immediately available at the scene of operations.
- c. The area must have portable fire extinguishers if ignitable waste is stored.
- d. Fire control equipment, spill control equipment, and decontamination equipment as needed for emergency response for the types of wastes stored must be maintained at each area.
- e. Adequate aisle space must be maintained.
- f. The area must be addressed in a Contingency Plan.
- g. All personnel who use the area must have been trained in hazardous waste management.
- h. Storage areas must be designed so that any leak will be contained on-site.
- i. Storage areas must be covered to prevent standing water.



FIGURE 3-6 HAZARDOUS WASTE

WEEKLY INSPECTION RECORD

ITEM	DATE	ТІМЕ	INSPECTOR	OBSERVATIONS	DATE AND CORRECTIVE ACTIONS
CONTAINERS:	and Bally	Server 20			
Construction					
Compatibility				le constant de la constant	
Segregation					
Leaks/Closure			and the second second		
Labels					
Ignitable Waste					
Aisle Space		Car del			
Accumulation Date					
DRUM DOLLY					
DRUM WRENCH	1 2 4 2				
FIRE EXTINGUISHER				1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
GATE LOCKED					
FENCE OK					
RESPIRATOR					
GLOVES					
ABSORBENT					
					Prise State State State
		1			



- j. Personal protective equipment which is adequate for the types of wastes stored must be available, in good condition, and properly used.
- k. All spills or leaks of a hazardous material or a hazardous waste must be promptly cleaned up and reported by generating work centers to the Emergency Coordinator.
- Each generating work center must make arrangements to familiarize on-base security, fire departments, and emergency response teams with the location of their TCA and the types of wastes to be stored in the TCA.

3.2.4 SUMMARY OF REQUIREMENTS

The following checklist summarizes the hazardous waste compliance requirements for generating work centers accumulating hazardous wastes in containers.

- 1. Collect and containerize hazardous waste daily in the container specified by the HMDC on the WID.
- Ensure that the container is marked and labeled according to the WID.
- 3. Maintain a Waste Generation Summary Report which identifies the container number, wastes generated, the accumulation start date, the date transferred out of the work center, and the destination.
- 4. Maintain a weekly inspection log identifying all items to be inspected, the date and time of the inspection, the inspector, observations, and date and time of any corrective action taken as a result of the inspection.
- 5. Ensure that all safety and emergency equipment is available and in good condition.
- 6. Ensure that all personnel handling hazardous waste are trained in the safety and emergency response procedures associated with each specific waste generated and/or stored at the TCA.
- 7. Contact the appropriate HMDO when a container is full or when it has been in storage for 45 days, whichever comes first. Hazardous wastes cannot be stored at the TCA for more than 90 days from the accumulation start date.



3.3 Satellite HW Accumulation Areas

A satellite HW accumulation area is an area in which a generating work center may accumulate as much as 55 gallons of hazardous waste (HW) or one guart of acutely HW [listed in 40 CFR 261.33(e)] in containers at or near the point of generation without regard to the 90 day storage limitation. Satellite accumulation areas are also not required to comply with full generator standards. The generating work centers which would benefit from utilizing this type of accumulation area are those who generate less than 55 gallons of HW from a particular process in less than 90 days. The rules allow a generating work center to have more than one satellite accumulation area provided the wastes are from different processes. If the generating process generates more than one waste stream, the waste streams may be segregated and still qualify as a satellite accumulation area as long as the total quantity accumulated is less than 55 gallons of hazardous waste or less than one quart of acutely hazardous waste.

In order to operate a satellite HW accumulation area at MCB Camp Lejeune, the generating work center must have written authorization from the Commanding General.

3.3.1 Requirements for Satellite Accumulation Areas

In order to be exempt from the 90 day storage limitation the following requirements must be met by the generating work center. - the container holding the HW must be in good contition or if it begins to leak, the waste must be transferred to a container that is in good condition;

- the container must be made of or lined with materials which are compatible with the waste;

- the container must be kept closed except when it is necessary to add or remove waste; and

- the container must be marked with the words "Hazardous Waste" or with the words that identify the contents of the container. Once the generating work center accumulates waste in excess of 55 gallons of hazardous waste or one quart of acutely hazardous waste, the work center must transfer the excess waste to a TCA or



comply with the requirements for TCA's within three days of the date the excess waste began accumulating.

3.4 Handling of Empty Containers

Each generating work center will make every reasonable effort to fully use the contents of containers to ensure that any residue left within the container is less than one inch. To the extent practicable, drums that contained hazardous materials will be reused to dispose of that material when it becomes a hazardous waste. Containers that previously contained a hazardous waste listed in 40 CFR 261.33(e) ("P" listed) or containers with one inch or more of residue of hazardous waste, are themselves a hazardous waste. They must be triple rinsed to be cleaned and purged of the residue.

Triple rinsing requires the use of a solvent capable of removing the residue from the container. A quantity of solvent equal to ten percent of the container capacity must be used for each of the three rinses. After rinsing, the solvent must be containerized for disposal as hazardous waste.

A container with less than one inch of residue of waste other than one listed in 40 CFR 261.33(e) may be disposed as nonhazardous waste, if disposal is necessary.

A container that has held a hazardous waste in the form of a compressed gas is empty when pressure in the container approaches atmospheric pressure.

Empty containers will be turned in to DRMO using a DD Form 1348-1 prepared according to Appendix 3-1.

3.5 Wastes Treated at the Generation Site Most wastes generated at MCB Camp Lejeune will be treated or disposed at a commercial hazardous waste treatment or disposal facility. However, it will be more efficient to treat photo-



graphic wastes containing silver at the shop or location where generated.

The Department of Defense (DOD) Directive 4160.22 established the Precious Metals Recovery Program (PMRP). The directive requires all DOD components to participate in the PMRP to the maximum extent possible. Within the Marine Corps, the precious metals recovery and reutilization program is established by Marine Corps Order 4555.3c.

Prior to disposal or treatment, a WID must be submitted to the HMDC for all photographic wastes. The HMDC will determine which wastes require silver recovery and will so inform the generating work centers.

Since the silver will be contained in photographic wastes, it can be recovered by ion-exchange cartridges attached to the sinks at the generating work centers. Spent cartridges will be removed and turned in directly to supply for processing. Recordkeeping will be in accordance with the standing operating procedures required by PMRP.


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HAZARDOUS WASTE HANDLING

I. Learning Outcomes Desired.

At the completion of this unit of instruction, you should be able to:

- A. Identify and avoid safety hazards caused by improper use of material handling equipment (MHE).
- B. Anticipate potential spill/release problems that could be caused by improper waste handling procedures.
- C. Identify and comply with any special handling requirements for hazardous waste.

II. Introduction.

If you're going to be handling hazardous wastes, it's important that you understand some of the problems that can occur if you fail to take certain precautions. Of course, you can have difficulty in handling any item, but the special characteristics of hazardous wastes can really give you trouble. Although many common problems are associated with having to move improperly packaged items, it's important to realize that packaging techniques alone won't necessarily prevent spills or accidents. During this unit of instruction, we'll cover the use of materials handling equipment, explain why proper handling procedures are necessary, describe some of the common hazardous waste handling problems you may face, and talk about the importance of following local safety procedures in handling hazardous waste at your worksite.

III. Materials Handling Equipment.

The following examples of MHE used at Naval facilities are familiar to most personnel. The safety precautions described for this equipment should be observed at all times but special care must be taken with hazardous wastes because of the serious consequences of a mistake or accident. Damaged packaging, spills (especially those in which two or more hazardous wastes are mixed), or other accidents caused by misuse of MHE can cause major problems.

A. Forklift trucks.

1. General. Forklift trucks are designed to pick up, carry, and stack unit loads of supplies and equipment. Standard forklift trucks are available with lifting capacities of 2,000 to 20,000 pounds and lifting heights of 100 to 210 inches. Gasolinepowered forklift trucks may be equipped with solid rubber or semisolid tires for use in warehouses or pneumatic tires for use in outdoor storage areas; electric-powered forklift trucks are equipped with solid rubber or semisolid tires for indoor operation only. Forklift trucks are not designed to be used as

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tow vehicles and should not be used for that purpose. Electricpowered models are more suitable than gas-powered ones for poorly ventilated areas and (when properly shielded) for handling flammable items and explosives. The National Fire Satety Standard for Powered Industrial Trucks lists 13 different types of forklifts. Several of these are described below:

- (a) Type D units are diesel powered units having minimal acceptable safeguards against inherent fire hazards.
- (b) Type DS units are diesel powered units that, in addition to all the requirements for the type D units, have additional safeguards to the exhaust, fuel, and electrical systems.
- (c) Type DY units are diesel powered units that have all the safeguards of the type DS units and, in addition, do not have any electrical equipment, including ignition. They are equipped with temperature limitation features.
- (d) Type LPS units are liquified petroleum gas powered units that are provided with safeguards against inherent fire hazards as well as having additional safeguards to the exhaust, fuel, and electrical systems.
- (e) Type E units are electrically powered units having minimum acceptable safeguards against inherent fire and electrical shock hazards.
- (f) Type ES units are electrically powered units that, in addition to all of the requirements for the type E units, are provided with additional safeguards to the electrical system to prevent emission of hazardous sparks and to limit surface temperature.
- (g) Type EE units are electrically powered units that have, in addition to all of the requirements for E and ES units, the electric motors and all other electrical equipment completely enclosed.
- (h) Type EX units are electrically powered units that differ from the E, ES, and EE units in that the electrical tittings and equipment are so designed, constructed, and assembled that the units may be used in atmospheres containing specifically named flammable vapors and dusts.
- (i) Type G units are gasoline-powered units having minimum acceptable safeguards against inherent fire hazards.
- (j) Type CS units are gasoline-powered units that, in addition to all the requirements for the type G units, are provided with additional safeguards to the exhaust, fuel, and electrical systems.

C. Pallets.

- 1. General. A pallet is a low portable platform constructed of wood, metal, or fiberboard, built to specified dimensions, on which supplies are loaded, transported, or stored in units. Flat pallets are either single faced or double faced. Single-faced pallets have one platform with stringers underneath on which the weight of the load rests. Double-faced pallets have two platforms, separated by stringers. Pallets may allow two-way or four-way entry. The two-way entry pallet is so constructed that the forks of a forklift truck may be inserted from either the front or rear of the pallet. The four-way pallet is built so that forks may be inserted from any side. Pallets permit transporting, storing, or issuing quantities of waste with a minimum of manual handling. The efficiency of operation is greatly increased since the pallet system of storage provides for the transportation of packaged items in unit loads and increases the volume and tonnage of wastes which may be handled per manhour.
- Problems. While the use of pallets is widespread and very necessary from a material handling perspective, there are potential problems that can cause spills of hazardous waste if a worker is not careful. The following questions should be considered when working with pallets.
 - (a) Is the pallet you're using of sound construction? Spills can be caused if you've loaded hazardous waste on pallets that are falling apart.
 - (b) Does the load fit the pallet? Often material is loaded so that it hangs over the edge of the pallet. A forklift truck or adjacent stack of material will often damage the container in such a case leading to a leak or spill of hazardous waste.
 - (c) Is the unit loaded evenly? Hazardous waste unevenly stacked will fall causing all sorts of problems.

IV. MHE Selection Factors.

The potential savings in terms of time, funds, and personnel resulting from the selection of the right type of MHE for an operation cannot be overemphasized. When handling hazardous wastes, this selection can be especially significant. When selecting equipment, the size, shape, weight, and container strength of the commodities to be handled should be considered. Some examples of the application of MHE are as follows:

- A. Palletized supplies are handled best by forklift trucks.
- B. Small, uniform sized commodities or containers are readily adaptable to palletization and handling as a unit by forklift trucks.

- C. Containers such as large bales, crates, or boxes may be efficiently handled and stacked by forklift truck with the use of short dunnage or special fork attachments.
- D. Large items packed in boxes or crates, with cleats or runners nailed to the underside of the container are generally adaptable to handling by forklift trucks.
- E. For small items to be moved over a short distance, or for handling items in confined areas, the handtruck may be most usefull.

V. Waste Handling Principles.

Whether or not an item is hazardous, certain general principles exist that should be recognized when a Navy facility is establishing procedures to handle waste. By developing an understanding of these principles, a worker will be able to recognize if the procedures being used are the best ones possible under the circumstances. Generally:

- The least handling is the best handling. The greatest economy in A. moving materials is secured by not handling the material at all. This is usually impossible but an attempt must be made to keep handling to a minimum. Since there is always a danger of a spill when moving hazardous wastes, the less they are moved, the less chance of a major incident. If hazardous wastes are properly identified and classified, they can be properly placed initially, thus reducing the need for further movement. Also, to avoid unnecessary handling, a single individual should be designated as the point of contact for handling and storage questions pertaining to hazardous wastes. This individual would be familiar with hazardous waste safety, storage, and handling considerations and could insure items were properly placed initially and handling requirements minimized. Another way handling can be minimized is to modify traditional storage and handling procedures. The feasibility of modifying procedures would depend on local facilities and operational procedures.
- B. Standardization of methods and equipment benefits the waste handling activity. Costs of operation can be reduced because maintenance and repair, storage, and handling procedures can be simplified. As standardized procedures are repeated, individuals become familiar with the special handling required for different types of hazardous wastes and are, thus, more likely to use correct procedures.
- C. Materials handling equipment should be selected for a multiple number of applications. Equipment should be purchased with the understanding that flexibility is a key note. Specialized equipment should be kept to a minimum. Normally, initial cost, cost of operation, and maintenance costs are greater for special equipment than for standard equipment. If equipment is used properly, most hazardous wastes can be handled safely using standard equipment.

- (m) Operators will not jam on the brakes or stop suddenly.
- (n) Operators must know where the override (panic) controls are located on electric forklifts and how to use them in an emergency. Incidents have occurred where the controller contact points have stuck shut or welded shut, preventing normal control of the forklift. Emergency controls must be checked each time the forklift is operated to make sure they work.
- 3. Fire hazards. A large number of fires involving forklifts are caused by equipment failure due to a lack of maintenance. Requiring special attention is the detection of faulty fuel connections on gasoline forklifts and the removal of accumulations of grease and dirt on all types of equipment. The number of fires involving battery-powered trucks is comparatively small; however, electrical short circuits, hot resistors, arcing or fused contacts, and exploding batteries have caused fires in some forklifts. Any vehicle that emits hazardous sparks or flames from the exhaust system should be removed from service immediately. When dealing with hazardous wastes, not only can the forklift start on fire but the flammable cargo may also ignite or explode.

B. Handtrucks.

- 1. General. Handtrucks are useful in all types of storage operations, particularly where mechanical equipment cannot be employed because of space limitations. They are often more economical to use for the movement of a single item than a piece of mechanical equipment. The four-wheel handtruck may be used to advantage in carrying light loads or for any operation involving short hauls with frequent stops. Because they can be more easily controlled, handtrucks are often the safest way to move small quantities of hazardous waste.
- 2. Safety precautions. The following safety rules are applicable to handtruck operations.
 - (a) The two-wheeled handtruck should not be used to transport units of material heavy enough to cause undue strain on workers.
 - (b) Barrel-type handtrucks should be provided to move drums, large kegs, or other cylindrical units to prevent rolling or slipping of the material causing possible damage to material or injury to workers.
 - (c) Handtrucks with spark proof wheels or rims will be used in areas or rooms where wastes of highly flammable or explosive nature are stored or handled.

The fact that different types of forklifts exist is important because different situations require the use of specific types of forklifts to handle materials safely.

- Safety precautions. The following safety rules are applicable to forklift truck operations.
 - (a) Forklift truck operators will slow down at all cross aisles and other passageways; when entering or leaving warehouses, the operator will come to a complete stop at the entrance, sound the horn, and proceed only when the way is clear.
 - (b) Under all travel conditions, the truck shall be operated at a speed that will permit it to be brought to a stop in a safe manner.
 - (c) Forklift trucks will not travel with the forks elevated more than 4 inches above the floor or ground and when parked, the forks will be lowered and rest on the ground.
 - (d) Stacks will not be bumped or pushed with the forklift trucks to straighten or move the stack.
 - (e) The load capacity plus the gross weight of each truck will be placed on the machine at a place that is visible at all times. The capacity will not be exceeded and counterweighting of the trucks to increase lifting capacity is prohibited.
 - (f) People will not stand under the loads being hoisted or lowered.
 - (g) Forklift trucks will be driven forward when transporting cargo up ramps or other grades and will be driven in reverse on downgrades.
 - (h) People will not be allowed to ride forks, machine, or load when the forklift truck is moving.
 - Forklift trucks will be driven slowly over railroad or rough surfaces.
 - (j) Overhead doorways and crossbeams will be cleared by the forklift truck.
 - (k) When the operator parks a forklift truck, he must check the brake to be sure the truck will not move.
 - Operators of forklift trucks must not cut corners. This practice may result in upset loads, damaged goods, and serious injury.

- B. Material will be examined for leaks, container damage, corrosion, weakened places, or other factors which may cause injury to workers. Defects should be corrected before proceeding.
- C. All stacked items will be arranged in an orderly manner for convenient and safe handling.
- D. Defective or broken strapping on packages will be removed, repaired, or replaced.
- E. Containers will not be thrown from elevated places to the floor or ground. Use suitable lowering equipment.
- F. Wheelbarrows, handtrucks, and other similar devices will not be overloaded. These devices will be pushed, not pulled, except when going up inclines.
- G. Ropes used for carrying or towing which have defects will be replaced.
- H. Appropriate tools will be used for each job. For example, nail pullers will be used for opening boxes, strap or wire cutters for cutting metal strapping or wire, and hammers for driving nails. Safety handtools are constructed of wood or other nonsparking or spark resistant materials (such as bronze, lead, and beryllium alloys) which, under normal conditions of use, will not produce sparks. Properly maintained, nonferrous handtools will be used for work in locations which contain hazardous concentrations of flammable dusts, gases, or vapors. Handtools used in the vicinity of hazardous wastes must be handled carefully and kept clean.
- I. Hand-operated trucks, dollies, and similar equipment will not be parked in traffic lanes or roadways.
- J. Cylindrical objects will be blocked to prevent rolling.
- K. When working at high elevations, a lifeline and safety belt will be worn if other safeguards are impractical.
- L. Carboy tilters will be used for safe removal of dangerous liquids, such as acids from carboys.
- M. Special bung fittings and automatic faucets will be used on drums for dispensing and storing of dangerous liquids.
- N. When transferring flammable liquids from one container to another make sure that the container is grounded and that a connector exists between the two containers.

- D. The number of items to be moved determines the method of handling. Regardless of the size, shape, or hazardous characteristic, the first question to be answered before selecting the type of MHE to be used is "how many have to be moved?"
- E. Advanced planning on waste handling methods and equipment should be carried on at the same time as other planning activities. This is particularly true with hazardous wastes since it's much easier to prevent an incident than to respond to one.
- F. Equipment capacities should never be exceeded. Overloading causes excessive wear of equipment and creates additional accident potential.
- G. The physical state of materials is a factor in determining MHE requirements. The three physical states of material--solid, liquid, or gas--determine the method of packing. Gases are contained in cylinders; liquids such as acids are contained in carboys; and solids such as sheet and bar stock metals may require wood skids. This type of packaging, in turn, influences selection of materials handling equipment.
- H. Short, irregular moves lend themselves to manual materials handling. Some materials handling operations do not occur with any degree of repetitiveness. The use of equipment may be much more costly than manpower. When moves are short, irregular and the load capacity of the men is not exceeded, it may be more economical to use manpower. Although this principle is generally applicable, when handling hazardous wastes, the facility must consider the cost of individual protective clothing and equipment as well as personal safety.
- 1. Wherever practicable, materials should be moved in the horizontal plane or with the aid of gravity. When people have to reach either up or down during loading and unloading, excessive effort is used. Changes in the workplace layout could reduce this extra effort and the inherent safety problems associated with lifting things up and down. An example of such a problem is accidently knocking a small bottle of hazardous waste off a shelf while trying to reach another item.
- VI. Waste Handling Safety Precautions.

There are a number of safety precautions that should be followed when handling any material. Given the special characteristics of hazardous wastes, it makes good sense to be especially sure you take these precautions when working with these wastes. When considering the following safety rules, think of how they might prevent spills or personal injuries.

A. Protective clothing and accessories including gloves, face shields, goggles, and safety shoes will be worn when required.

VII. Hazardous Waste Handling Considerations.

So far, we've talked about the various types of MHE available to you, general principles for using MHE, and safety precautions to take when handling hazardous waste. It's useful to review some of the reasons why extra attention should be paid to handling hazardous wastes. Essentially we're trying to prevent accidents, spills that damage the environment, and damage to the waste being moved (either directly or indirectly). lt's important to remember that damaging the pallet or outer container will often result in spills or accidents at a later time. That's why it's necessary to avoid such things as damaging a pallet or container by hitting it with a forklift. When handling a hazardous waste, it's useful to recall why the waste is hazardous. It may be sensitive to an increase in temperature; it may be sensitive to vibration; it might react adversely to water; or it might be under pressure. If you fail to consider these factors when handling hazardous waste, you can expect trouble, either immediately or later on. There are a number of questions you can ask yourself that can help you handle such waste safely. These include:

- A. Am I handling hazardous waste in accordance with local operating procedure?
- B. Have I avoided handling incompatible wastes at the same time?
- C. Am I using the right piece of MHE to move this item?
- D. Am I operating MHE safely?
- E. Am I using adequate personal protective equipment?
- F. Am I avoiding damaging the outer container?
- G. Am I using proper procedures to handle hazardous waste?
- H. Do I report/clean up spills when they occur?
- I. Do I know how to identify an item as hazardous prior to moving it?
- J. Do 1 understand "what can go wrong" when handling hazardous waste?
- K. Do I know how to find out if special handling is required for certain waste?

Being able to answer all of the questions above may not guarantee that accidents and spills will be a thing of the past, but the chances that you won't be responsible for such a problem are increased. Of course, in order to make sure you're not a victim of your friends' ignorance, it's necessary that everyone working at your facility be able to answer these questions and act accordingly.

VIII. Sources of Information.

Sources of information may provide guidance on handling hazardous wastes. One such source is the Hazardous Materials Information System (HMIS) available at your activity. On the microfiche, special handling procedures are listed for each chemical. If these procedures are different than standard procedures, they should be noted and all waste handlers should be informed.

IX. Summary.

During this unit of instruction, we've covered the use of materials handling equipment; the typical types of MHE available; why proper handling procedures are necessary; and common problems encountered when handling hazardous waste. Proper waste handling procedures can prevent injuries to workers, spills which damage the environment, and damage to valuable material which costs the taxpayer money.

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SPILL RESPONSE, CLEANUP, AND DECONTAMINATION

I. Learning Outcomes Desired.

At the completion of this unit of instruction, you should be able to:

- A. Make immediate and effective response to spills, releases, or leaks of hazardous wastes in which no fire or explosion is involved.
- B. Use appropriate containment techniques and materials to prevent the spread of spilled wastes.
- C. Evaluate spills and take appropriate steps toward evacuation when containment and control are hazardous to the safety or health of immediate bystanders or facility personnel.
- D. Clean up minor spills or leaks of hazardous wastes and decontaminate the spill area when safe and appropriate, in accordance with the local Activity Spill Control Plan (ASCP) and facility Standard Operating Procedures (SOP).
- E. Use appropriate protective clothing during spill response and cleanup.
- F. Use emergency shower and eyewash when skin or clothing is splashed or contaminated with hazardous wastes.
- II. Introduction.
 - A. When a hazardous waste is released from its container, how do you tell whether you have an immediate problem? What do you do to clean up the released waste? Should you leave the area and let the activity spill response team (RT) and the on-scene coordinator (OSC) clean it up?
 - B. To answer these questions, you need to consider the waste spilled; the size and speed with which it is being released; the surface on which it is spilled; what other wastes are stored nearby; whether there is any fire or explosion hazard; how much training you have had; whether you are alone; what materials and equipment you have to respond with; and Navy policies. This unit of instruction is designed to give you a start at answering these questions.

III. Hazardous Waste Accidents.

A. The trigger. What are some of the things we should automatically start considering once an accident occurs? Let's assume that the trigger is damage to a container, and that at least at the outset no fire is involved.

4756A--Date of last revision: 1 Feb 1983



1. What is it?

- (a) Does the container type tell anything about the contents (for example a gas cylinder)?
- (b) What other means of identification are available on the container (name, stock number, hazard label)?
- (c) Does the storage location tell anything about the type of waste, or are area identifiers or labels available which cover the particular stack?
- (d) What do physical state (solid, liquid, gas), appearance, and odor tell about the waste's identity?
- 2. Is it hazardous?
 - (a) Do you know what it is by name yet? Or if not, are there other indicators (hazard label, location, it's bubbling, someone has been splashed and he's yelling).
 - (b) What type of hazard (for example, poison, flammable, oxidizer, shock-sensitive)?
- 3. How hazardous is it (immediate explosion predicted; corrodes/dissolves wooden pallets; chronic exposure cancer hazard with no immediate danger)? Is it hazardous in itself, or due to proximity to other wastes? What is the rate, quantity, and direction of release?
- 4 To whom or what is it hazardous? Any immediate injury? Is it moving into soil, outside air, draining into surface waters, draining into sewer system?
- 5. What other factors add to the danger (for example sparks, cigarettes, no nearby showers or protective clothing)?
- B. General emergency response sequence. In the ideal situation, you would discover the answers to all the above questions in only a few seconds, and then be prepared with precisely the correct response. However, usually you have to begin responding before all the questions are answered. We will therefore discuss a general response sequence for emergencies. Our general emergency response sequence uses the acronym R-A-C-E, which reminds us to hurry and stands for rescue, alert, contain, evacuate.



- 1. <u>Rescue.</u> If anyone is injured, including yourself, rescue should be the first objective. If you are rescuing a victim, you don't want to become one yourself. Precisely what actions are taken will depend on the person's condition. Someone in your facility should have had both general first aid training and training in cardiopulmonary resuscitation (CPR), and their aid should be enlisted as soon as possible. Here are some additional steps to follow.
 - (a) Remove the victim from the spill area as soon as possible, after properly preparing yourself (i.e. protective clothing, respirator, etc.)
 - (b) If the person has spilled chemicals on their skin or clothing, get them to an emergency shower as soon as possible and drench for 15 minutes unless you know it's not necessary. Get the clothes off while you're at it. (Don't let the person put them back on later). (NOTE: Some of the emergency response guides make a distinction between washing "promptly" and washing "immediately." This distinction is based on the speed with which the contaminating wastes can damage the skin and their general level of toxicity if absorbed into the body. "Immediately" means "right now; run to the wash facility," but "promptly" may allow you time to quickly strip your clothing first.)
 - (c) Have a blanket, sheet, or coat available to prevent body heat loss after using shower; in fact a good supply cabinet should have some sort of temporary garment (drawstring pants and loose top, slippers) that a person could wear home if not otherwise injured.
 - (d) If the person is having difficulty breathing, administer pressurized air or oxygen if you have it. (Make sure the Activity Response Team has some.)
 - (e) For those of you dealing with unconscious persons:
 - Don't try to give liquids, even antidotes.
 - Use something which allows you to give artificial resucitation without transferring corrosives or contaminants from the victim's facial skin to your mouth.
 - Make sure you know how to give artificial resucitation other than mouth-to-mouth. If the victim has inhaled a poisonous gas, mouth-to-mouth will poison you as well.



- (f) In general, put on protective clothing before attempting rescue. Use the best you've got. Some protective gloves, for example, are not the best for regular use with certain chemicals but will suffice to protect you during a rescue situation. Unless you know the specific chemical and have a canister respirator for it, choose a respirator with self contained air supply. Note that lack of an odor is not sufficient to indicate safety.
- (g) Put on protective equipment for the remainder of the response sequence as well.
- Alert. Notify your supervisor, who will then follow the 2. instant notification procedure defined in your host activity's spill contingency plan (ASCP). If your supervisor isn't handy and it's really an emergency, make the call yourself. Request an ambulance if necessary; make that call yourself if you can. Give the RT point of contact some information about the spilled waste--identification, rate, quantity, direction of movement, injuries, potential hazard as you see it. The activity on-scene coordinator will notify and involve other organizations as necessary. (A further word: major spills and other emergencies bring out public officials, reporters, and other bystanders. Be sure you are familiar with required communication channels as specified in the ASCP. Loose talk might cause unnecessary panic or otherwise interfere with orderly public relations.)
- 3. <u>Contain.</u> Just what you do in an emergency to contain a spill or release will depend on the extent of the emergency. General containment procedures are covered later, but here are some specific points.
 - (a) Wastes of great toxicity or other inherent hazard should be contained if at all possible to prevent them from entering surface waters or flowing onto soils from which they eventually could leach into ground waters. Try to set up some type of absorbent or containment system immediately, even for small spills.
 - (b) Where larger volumes are involved, the best defense is having some sort of diversion and containment system already available. In their absence or for "medium-sized" spills, large quantities of sorbents will be necessary. Pillows and boom-type containers used in spills on water can also be used on land as temporary berms for larger spills.
 - (c) Throw up temporary earth, straw, or clay berms to prevent drainage off site.



- (d) Turn off valves supplying gases; turn on valves opening special drainage systems. Cover all other drains (sewage and storm systems).
- (e) Control of vapors already released usually means do not contain them. They are generally much more hazardous in enclosed areas. Other than shutting off the supply, the best thing to do may be to ventilate buildings and evacuate if necessary.
- (f) With particulate solids or flammable liquids, control sources of spark or static.
- (g) Containment always includes preventing reaction with incompatible wastes, including metal or wood pallets.
- 4. Evacuate. Includes evacuation of the affected areas, adjacent lands, and off-installation areas as necessary. The RT will usually make the decision for any evacuation beyond the activity itself. Someone within the activity should be assigned to evacuate important records if there is any chance of fire or explosion or toxic gases preventing access to them when needed. This includes records which identify and locate hazardous property, and spill response guides. All persons not designated to perform specific tasks in an evacuation should immediately and calmly leave the premises by designated routes and assemble in specific areas outside so they can be checked off as "accounted for."
- IV. Containment and Cleanup.

These two steps cannot be considered separately because some materials used to "contain" are subsequently picked up and removed in "cleanup". In the following discussion "contain" means prevent from spreading further.

- A. Stop Discharge. The first step is to stop adding to the release. This may consist of:
 - 1. Turning off pumps or closing valves.
 - 2. Returning containers to upright position.
 - 3. Patching holes.
 - 4. Transferring wastes to other containers.
 - 5. Moving containers to a less dangerous location.



- B. Contain. The expansion of an existing spill can be prevented or slowed:
 - On water (if the waste floats), by use of floating barriers (booms), porous absorbent materials, or by "herding" using propellers, water hose streams or chemicals that change the surface tension of the spilled waste.
 - On land, by porous or absorbent barriers in consolidated or positiculate form. See table 1 for examples of the materials which may be used.
 - 3. The only way to contain gases is by burning. This may not be appropriate in some situations.
- C. Collect and Recover. Liquid or solid spilled waste is gathered together so it can be separated and recontainerized in contaminated or filtered form.
 - 1. On water, floating wastes are skimmed off with their absorbents, run through separators and stored. The absorbent may often be reused. Materials which dissolve cannot typically be recovered; materials which sink may be pumped or dredged from the bottom, then separated and stored.
 - 2. On land, spilled waste may be diked, by absorbents or other material, or pumped or drained to a diked (and possibly lined) temporary storage area; or the absorbents may be used to soak up the entire spill. Recovery is by pumping to storage or by separation from the absorbents used. Contaminated soil may need to be removed and replaced in some cases.
- D. Treat. A spill, or nonrecoverable portions of it, may be treated to render it nonhazardous.
 - Burning. Ignition of the spill itself is a dangerous business. It could be useful to remove floating flammable liquids to stop downwind travel of flammable gases.
 - 2. Neutralize.
 - (a) Acids and alkalis can be neutralized--returned to a neutral pH. (This usually does not affect any toxic characteristics of the material.) In either case, a pH meter, pH paper, or litmus paper is needed, along with a noncorrodible stirrer (glass, ceramic, or teflon rods, or noncorrodible floor-type squeegee)



and enough neutralizer to equal two to three times the volume or weight of the spilled chemical (use the larger amount). After sufficient mixing the resulting pH should be between 6 and 8. (Concentrated acids have a pH below 3; alkalis are usually above 12.) The neutralizer must be weak or adverse reactions may result. Table 2 lists potential neutralizers.

- (b) Strong oxidizers and reducing agents may also be "neutralized" but this is an entirely different process and must be specific to the particular chemical, so it should only be done under the supervision of a chemist.
- Absorb. Absorption as a treatment method is really a combination of containment, collection, and either recovery or disposal.
 - (a) The sorbent is distributed using mops, "pillows," sheets, or booms, or as loose chips, particles, beads, or fibers (scattered by hand or by blower).
 - (b) The sorbent with its absorbed spill material is collected by skimming, direct pickup, filtering, or settling. This can be a cumbersome and hazardous process.
 - (c) If desired, the hazardous waste can be squeezed, wrung, or centrifuged out of some types of sorbents so that the sorbent can continue to be used for treating the spill. The chemicals so removed must be stored appropriately prior to reuse and disposal.
 - (d) Sorbents not to be reused immediately must be disposed of. Unless they change the chemical composition of, or otherwise react with, a spilled hazardous waste, they are now hazardous waste with associated disposal requirements.
 - (e) Preferred sorbents are inert nonreactive clay minerals (neutralizing agents may be added), activated carbon (for control of flammable vapors), or specific formulations which provide automatic neutralization or vapor control. "Imbiber beads" (DOW chemical) are excellent for PCbs and other hazardous wastes because they hold the absorbed chemical in an essentially nonleachable form.



Table 1. Examples of Absorbent Materials

Mineral Products	Vegetable Products	Synthetic Products
Perlite	Straw	Polyurethane
Talc	Нау	Polystyrene
Vermiculite	Sawdust	Polyester Plastic Shavings
Clays	Bark	Urea Formaldihyde
Volcanic Ash	Peat	Resin Type Foams
Chalk	Kelp	
Fly Ash	Corncob Grindings	
Carbon Powder	Modified Wood Fiber	
Activated Carbon		



Certain chemicals require special absorbents. For example, elemental mercury liquid, which gives off toxic vapors, requires special materials to attract the very small droplets of the metal likely to remain undetected on floors. Hydrofluoric acid is extremely poisonous in addition to being a strong acid, and so requires more than a simple neutralizer.

V. Decontamination.

Decontamination removes the last traces of hazarous waste from the areas where it spilled, from cleanup materials, and from protective equipment and clothing. Decontamination procedures for commonly used chemicals should be part of the SCP or facility spill plan. Many chemical and safety equipment firms have kits available for decontamination of protective equipment. Some chemicals you may work with (where you would have the protective equipment on all day) require cleaning your equipment at the end of every work shift. Generally:

- A. Outdoor surfaces may require final cleaning via steam and hot water, abrasive blast cleaning (dry or wet), high pressure water, or surface sorption. Consult EPA since the waste stream may be hazardous.
- B. Indoor surfaces may be cleaned by modified versions of the above methods. Some materials are not very soluble in water and some other solvent would be preferable.
- C. The Laboratory Waste Disposal Manual of the Chemical Manufacturers' Association (under their former name, the Manufacturing Chemists' Association) provides guidance on decontamination of small quantities of spills which may be appropriate for removal of final traces of spilled material. If a person with some background in chemistry can be assigned to maintain stocks of decontamination materials and perform such services, it may be practical to have decontamination performed in-house. Otherwise, the OSC should
- D. Contaminated response equipment and clothing should be rinsed or wiped with some solvent of the spilled waste (which does not react with the equipment) after each incident. Equipment should also be checked for cracking and wearing every one to three months.
- E. Clothing which must be laundered should be washed separately. It is generally best to run an empty tub full of water between launderings. Do not wash with children's clothes. Discard badly contaminated clothes.
- F. Exposed skin should be washed thoroughly with soapy water after exposure and after spill response is completed. This applies even if no contamination was noticed.



Table 2. Potential Neutralizers

Neutralizers for acids	Neutralizers for bases (alkalis)
Limestone (CaCO ₃)	dilute acetic acid (vinegar)
dolomite (MgCO3-CaCO3)	citric acid (granular, anhydrous or monohydrate)
soda ash (Na ₂ CO ₃)	dry ice (plus waterforms weak carbonic acid
slaked lime	

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- G. Avoid touching the face or eyes during spill response without thoroughly washing hands first. Don't eat without a complete change of clothes; don't use lunch areas while wearing contaminated clothing. Don't smoke during spill cleanup.
- H. Don't forget that your shoes, watchband, cap, and eyeglasses are part of your clothing and must be decontaminated. To avoid contaminating personal garments, use overboots and goggles during cleanup operations.
- I. Don't wear contact lenses at any time around hazardous chemicals, especially when a spill has occurred. If you must wear contact lenses, use special sealed goggles or a full face mask.

VI. Emergency Guides

You will have an opportunity to use some of these later in a practical exercise. Table 3 lists the major advantages and disadvantages of several of these response guides.

- A. US Coast Guard Chemical Hazard Response Information System (CHRIS) Condensed Guide to Chemical Hazards.
- B. CHRIS Response Guides.
- C. National Fire Protection Association 49, Hazardous Chemical Data.
- D. NIOSH/OSHA Pocket Guide to Chemical Hazards.
- E. 1976 or 1977 Department of Transportation Hazardous Materials--Emergency Action Guide.
- F. 1980 Department of Transportation <u>Hazardous Materials-- Emergency</u> Response Guidebook .
- G. Deparment of Defense "Hazardous Materials Information System (HMIS)."
- H. Chemical Manufacturers' Association " Materials Safety Data Sheets" and "Chemcards."



Table 3. Advantages and Disadvantages of Emergency Response Guides

Response Guide	Major Advantages	Major Disadvantages
CHRIS Condensed Guide	portable	small print; not all CHRIS listings
CHRIS Response Methods Handbook	thorough response discriptions	not portable; much internal cross-referencing
NFPA Hazardous Chemicals Data	fire department will have copy; portable	primarily describes hazards and response for fires
NIOSH/OSHA Pocket Guide	thorough; portable	many abbreviations
1976/77 DOT Emergency Action Guide	thorough; gas/ explosion evacuation guides	major transported chemicals; no longer in print
1980 DOT Emergency Response Guidebook	more current than 1977 guide; has UN numbers	cross referencing required
HMIS	has National Stock Numbers	microfiche; missing information
CMA Material Safety Data Sheets	thorough (manu- facturer may have updated versions)	not portable; out of print
CMA Chemcards	portable	major transported chemicals; ordering

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IN REPLY REFER TO:

5000 PWO

From: Commanding General, Marine Corps Base, Camp Lejeune To: Commander, Atlantic Division, Naval Facilities Engineering Command, Norfolk, VA 23511-6287 (Code 1143, Steve Olson)

Subj: HAZARDOUS WASTE/MATERIALS AND USED OIL MANAGEMENT STUDY AT MARINE CORPS BASE, CAMP LEJEUNE

1. The subject study is currently under review by MCB, Camp Lejeune. Consolidated comments will be provided to you in the near future to allow completion of the final report.

2. In the interim, several action items regarding waste oil management require immediate attention. It is requested that arrangements be made with the current A&E, Ensafe, to provide the following:

a. Site visit to Camp Lejeune to obtain revised MCB policy decisions and review MCB comments for waste oil management. Based on this visit, modify used oil management plan to reflect current MCB policies and federal/state regulations.

b. Provide alternative management strategies, cost estimates, and facilities documentation for the collection, handling and disposal of:

(1) Skimmings from oil/water separators and similar facilities.

(2) Grit and other solids/semisolids from cleaning of oil/water separators and similar facilities.

(3) Residues occurring from cleanup of oil spills and leaks including:

(a) Absorbents (grannular and matting)

(b) Contaminated Soil

(c) Oil/Water Mixtures

c. Evaluate existing condition of used oil storage facilities associated with:

(1) Holcomb Boulevard Storage Facility (S-888 - S-891)

(2) Building 45 Storage Tank

(3) Tarawa Terrace Storage Facility (STT-61 - STT-66)

(4) MCAS, New River Storage Facility (AS-419 - AS-421)



Subj: HAZARDOUS WASTE/MATERIALS AND USED OIL MANAGEMENT STUDY AT MARINE CORPS BASE, CAMP LEJEUNE

Recommend or provide the following:

(5) Suitability for continued use to include modification requirements and cost estimates.

(6) Suitability/feasibility of relocation of serviceable tanks.

(7) Requirements for cleaning of waste oil tanks which previously held oil containing regulated quantities of organic halogens.

(8) Provide a plan with cost estimates and documentation for demolition of facilities not suitable for or required for continued use in managing waste oil.

d. Evaluate alternatives and provide recommendations for siting of proposed waste oil facilities. Include the following:

(1) Select site for the two waste oil storage areas (MCB and MCAS) from proposed sites.

(2) Provide project site plan for each selected location, including layout of tanks, unloading docks, existing utilities, etc.

(3) Update project documentation and cost estimates for the two selected sites to allow submittal under the MCON program.

e. MCB currently has an approved minor construction project beginning design. The project intent is to alleviate current waste oil separation and storage problems. Request Ensafe provide recommendations for design to insure effectiveness of facilities and compatibility with future MCON projects.

f. Provide a phased plan for handling waste oil. The plan should address the following:

Phase I - Procedures for handling waste oil with the currently available facilities (tanks, pump trucks). Address segregation, storage, disposal, etc.

Phase II - Procedures for handling waste oil upon completion of the R-2 project noted above. Address coordination of new facility with current facilities regarding segregation, storage, disposal, etc.

Phase III - Procedures for handling waste oil upon completion of total waste oil handling facilities at MCB and MCAS.

3. Although portions of the above are within the original study scope of work, it is recognized that several items include additional work for which Ensafe should be compensated. Appropriate funding will be provided upon request.







Subj: HAZARDOUS WASTE/MATERIALS AND USED OIL MANAGEMENT STUDY AT MARINE CORPS BASE, CAMP LEJEUNE

4. It is requested you review the above items and contact MCB personnel regarding projected completion dates as soon as possible. MCB point of contact is Mr. F. E. Cone, Design Director, Public Works Office, AV 484-2213.

T. L. HUGUELET By direction

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Copy to: AC/S FAC NREA BMO



6240 NREAD 30 Nov 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 MATERIAL SAFETY ISSUE AT BUILDING FC-40, (2D MAINT BN, MOTOR POOL)

Encl: (1) John Riggs, Biological Technician memo of 25 Nov 87

1. The enclosure is provided as an item of concern. It is recommended the subject issues at building FC-40 be forwarded to the Commanding General, 2D FSSG for an investigation to establish the facts and appropriate action if criminal activity is involved.

2. I am advised the enclosure addresses chemical agent resistant coating, which is being, or will be used on tactical vehicles. Accordingly, it is recommended PMU/Base Safety be requested to look into the matter to determine if adequate health and safety precautions are in place for the Camp Lejeune complex.

3. NREAD will look into the hazardous waste stream situation to determine if there is a problem. It is also recommended that a copy of the enclosure be provided to Base SJA for information.

J. I. WOOTEN

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





DATE: 25 November 1987 FROM: John Riggs, Biological Technician TO: Director, Notural Resources and Environmental affairs \$30 Nov \$7 Jia: Supervisory Ecologist, Natural Resources and Environmental affaired 75110087 SUBJ: Care Paint / letter SUBJ: Corc Point / letter

1. attached is a copy of a letter recieved in this office on 25 November 1987. Please review and forward your recommendations.

2. Please note - FC 40, 20 maind. BN motor Pool was not on area I have previously inspected, Nor do I have any idea "who or whom" this letter was originated by. The E. Riggs

23 November 1987 John Rigger, Bilogical Facturien. Minister, Notwer Riscourse and Environmental Afain My MA 10: Approximan Experies visional Riscourses and Environmental off allaffers Care Pairty Little. 1. attacked in a copy of a letter received in the office une de Noyember (951. Please review and forward gove recommendation. 1. Plenar, note - FC 40, 26 mail. Bl' mater Rolf was not on one of love provided inspected, nor do et land any soles " whe a whom " this letter was originated by." The state of the s

Than You! Natural Resources : Environmental Division Bldg 1103 (ATTN: HR. Riggs) Camp Leferme, NC 28542



To whom it may concern:

This letter is being written to you out of concern for the lives of the personnel who work in Bldg FC 40(2d MaintBn Motor Pool). Somehow, someone ordered Carsogenic Paint and it was delivered to the Motor Pool. It was being kept in the tool room until someone moved it and put it in the paint locker where someone inadvertently took a can. There were 12 cans delivered as you can see from the enclosed letter. Personnel were informed Monday morning that there was a can missing because there were only eleven cans accountable. Later that afternoon they were told that the can was not missing and that there were only 11 cans from the start. They were also told of the potential danger that the paint could cause if used in the wrong So, there is someone out there with this can of paint which is deadly way. if used in the wrong way, and there is also a chance that this person doesn't know the potential danger that they are in. It would seem that when the paint was discovered missing that the remainder of the paint wouldbe taken out of the area or sent back to where it came from but instead it is being kept in the Motor Transport Officer's office in FC 40 unsecured where anyone could take a can if they wanted to pull a prank or get revenge on someone. This is a sign of irresponsibility on the person in charge of this area. According to the environmental personnel here aboard Camp Lejeune, the paint is not to be used unless adequate facilities have been furnished and certain health specifications are met in accordance with the enclosed documents. As you can see, this situation should not be taken as lightly as it is being taken. This letter is being written only because of the concern for the personnel who worked in FC 40. It is suggested that proper steps be taken to eradicate this situation as soon as possible and to ensure the safety of the rest of the personnel. It seems that the personnel in charge are being very irresponsible about the lives that have been entrusted in their hands by keeping the paint in the area where anyone could get a hold of it. They are also showing their irresponsibility by disregarding the fact that out there somewhere there is' someone with that missing can of paint. Just think, out there is someone who is potentially dangerous to himself and others if he uses that paint, not knowing that this could be sudden death to him or anyone around him. Think about the rest of those personnel in FC 40 who are still there with those cans of paint unsecured and within anyone's reach-someone might even want to take one and purposely do harm to someone. Do you think that it should even get this far? HOW ARE YOU GOING TO FEEL IF SOMEONE DIES ANF YOU KNOW THAT THERE WAS SOMETHING THAT YOU COULD HAVE DONE ABOUT IT? THINK ABOUT IT !!!

Copy To:

MTO CO, H&SCO CO, 2D MAINTEN NATURAL RESOURCES & ENVIRONMENTAL AFFAIRS DIVISION





NILES CHEMICAL PAINT COMPANY

MANUFACTURERS OF LACQUERS VARNISHES SYNTHETIC ENAMELS RESINS P.O. BOX 307 225 FORT STREET NILES, MICHIGAN 49120-0307 (616) 683-3377

Maria Court of the

CERTIFICATION-

This is to certify that the _ - 6 Orts & 61/2 Pints XE-7751 A 383 Green Gallons Of XE-7751 B Activator Server 1 Shipped to _____ Camp Lejuene NC _____ on 10/87 on their order_____TPN-B-M3873-1T

Mil-C-46168 Performance specification .

42 for A Batch # -D-111-7-1228 for B

Shelf Life Expiration Date: 1 Year From Above Date Unless Mixed

NILES CHEMICAL PAINT COMPANY

Lawton, Vice President Sales

meets the

20 Subscribed and sworn to me before this day of Constant. Oct 1987.

La marte state in the state

Michael L. Troost Berrien County, Michigan My Commission Expires: 12/22/90

UPS



INSPECTION FOR MARINE CORPS BASE

DA	TE		TIME	ORGANIZATION	INSPE	ECTOR
14	Dec	87	0900	Rifle Range	John	Riggs
14	Dec	87	1030	MCES		n
15	Dec	87	0830	MCSSS		n
15	Dec	87	1400	Field Med School		н
16	Dec	87	0900	Reserve Support Unit		u
16	Dec	87	1000	Support Battalion		"
16	Dec	87	1100	Headquarters Battalion		н
16	Dec	87	1300	School of Infantry		u .
17	Dec	87	0830	Base Maintenance		n
18	Dec	87	0830	AC/S, MWR		н
21	Dec	87	0830	AC/S, Logistics		n.





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

IN REPLY REFER TO: 6240 NREAD DEC 02 1987

From: Commanding General, Marine Corps Base, Camp Lejeune

Subj: HAZARDOUS WASTE MANAGEMENT COMPLIANCE INSPECTIONS

Ref: (a) BO 6240.5A

- Encl: (1) Hazardous Waste Management Inspection Report, format for
 - (2) Schedule of hazardous waste inspections for the period of 14 - 21 December 1987

1. The reference published the subject requirements. Enclosure (1) provides the format for inspections, and enclosure (2) identifies organizations which will be inspected in the near future.

2. Please note that enclosure (1) stresses effectiveness of hazardous waste management activities of commanding officers and the Hazardous Material Disposal Officers. Point of contact on this matter is Mr. Danny Sharpe, Supervisory Ecologist, Natural Resources and Environmental Affairs Division, at extensions 2083/1690.

A. J. Woot

J. I. WOOTEN By direction

Distribution: Rifle Range MCES MCSSS Field Med School RSU Support Bn Headquarters Bn School of Infantry Base Maint AC/S, Log AC/S, MWR PRICO SALAAN SILATA CITANU AANA SANGGI ZMITA Ngangangan Sanggi Citang Ana Si

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HAZARDOUS WASTE MANAGEMENT INSPECTION REPORT

	DATE:
Organization being inspected:	
Organization Point of Contact:	
	Phone Number:
Name of inspector/other inspectio	n participants/phone#:
<pre>l. Evaluation of the organizatio Program:</pre>	ns Hazardous Waste Management
a. Has the Commanding Office	r published written hazardous
waste management objectives, goal	s, policies and procedures?
YES NO	
b. Has the Commanding Office	r appointed a primary and at
least one alternate Hazardous Mat	erial Disposal Officer (HMDO)?
YES NO	
c. Has the Commanding Office	r established internal controls
to ensure ongoing compliance with	BO 6240.5A? YES
NO (Describe how violati	ons are handled)
d. Does HMDO have current li	sting of all sites where hazardou
wastes are handled? YES	NO
e. Are quarterly inspections	being conducted by HMDO per
BO 6240.5A?YES	NO
f. Do records indicate that	HMDO is providing follow up to
correct discrepancies identified	by either HMDO's inspections,
or inspections conducted by exter	nal agencies? YES

NO



.g. Regarding Hazardous Waste Training:

(1) Are training and training records adequate and complete , for all primary and alternate HMDO's? YES NO

(2) Does HMDO have a current roster of hazardous waste handlers and managers at each site where hazardous wastes are generated, stored or otherwise handled? YES NO

(3) Are current up-to-date training records available in HMDO's files for each hazardous waste handler and manager?

YES NO

(4) Have any personnel worked as a hazardous waste handler or manager without direct supervision prior to having required training? _____YES ____NO

(5) Are all personnel provided adequate hazardous waste training within six months of date assigned to hazardous waste duties? _____YES ____NO

(6) Has HMDO notified cognizant Hazardous Material Disposal Coordinator (HMDC), in a timely manner of the training requirements for each newly assigned hazardous waste handler or manager? _____YES ____NO

(7) Are personnel training records maintained for at least three years after individual is relieved of hazardous waste related duties? _____ YES _____ NO

h. Regarding notification of hazardous waste activity:

(1) Have Waste Identification Documents (WID's) been properly submitted to HMDC on all hazardous waste? (Ref. 6240.5A)

_____ YES _____ NO

(2) Are properly completed WID's on hand? YES

NO



i. Regarding processing of hazardous waste turn-in documents:

 (1) Does HMDO inspect each waste prior to turn-in of

 DD 1348-1 to DRMO? YES' NO

 (2) Does HMDO demonstrate knowledge of how to identify

and correct discrepancies commonly associated with hazardous

waste turn-in's? YES NO

A Lawrence and

(3) Are Forms DD-1348-1 turned in to HMDO at or about
45 days after "accumulation start dates"? YES NO
(4) Does HMDO monitor and follow up on DRMO processing
of turn-in's? YES NO

(5) Are HW physically transferred to DRMO within dead-

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and the second second second second second second second second second second second second second second secon

lines? YES NO

2. Comments:



1. Administrative:		
a. Name of Site:	anna anna anna	
Organization in charge:	Section Allera	she
Degranible Official:		
Responsible official:	t standard on	erating
b. Adequacy of nazardous waste management	t Standard op	ci u cing
procedures (SOP):		NO
(1) Is a written SOP available?	YES	NO
(2) Does SOP provide names and phone	numbers of cu	irrent
HMDO's and HMDC's? YES NO		
(3) Does SOP contain the following?	en de la companya de la companya de la companya de la companya de la companya de la companya de la companya de La companya de la comp	Sector Free and
(a) BO 6240.5A	YES	NO
(b) BO 11090.1B	YES	NO
(c) BO 11090.3	YES	NÖ
(d) WID for each HW handled	YES	NO
(e) HM/HW Spill/Emergency Procedu	res YES	NO
(f) Copies of weekly inspections	YES	NO
(g) Location sketch for each HW g	eneration, ac	cumula-
tion, and storage areas?YES	NO	
(h) Material Safety Data Sheets o	r Hazardous M	Material
Information System for each HW? YES	NO	anti Artig
(i) Sample copies of turn-in docu	ments (Form I	DD-1348-1
and HW labels for each type of HW generated?	YES	
c Are there any HW handlers or managers	working at	the site
who are not on the HMDO's roster?	S	NO
who are not on the habo s roster i		a oʻranga soʻranga Malati dalayo soʻranga



2. Condition of HW containers and rela	ated storage area	
a. Do all HW containers have the w	words "Hazardous Was	ste"
clearly spelled out? YES	NO	SHE .
b. Are contents of all containers	clearly labeled?	
NO		
c. Is the accumulation date clear!	ly marked on each HW	N
container? YES NO		
d. Is HW being removed from the si	ite in less than 90	days?
YES NO		
e. Condition of containers:	1	
(1) Leaking drums	YES	N
(2) Rusted drums	YES	N
(3) Dented or bulging drums	YES	N
(4) Are all container bungs or caps in		
place	YES	NO
(5) Are covers for open top drums bolted in		en en en en en en en en en en en en en e
place	YES	NO
f. Is there any evidence of spills	s or leaks on the gr	ound?
YES NO		
g. Are contingency plans posted ar	nd currently updated	at
all sites? YES NO		
h. Are weekly inspections of HM/HW	V being conducted ar	nđ
corrective action noted properly?	YES NO	
i. Are Spill Emergency Response si	gns posted?	YES
NO (Ref BO 11090 1B)		

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j. Are ade	equate supplies of empty	y containers, al	osorbents,
neutralization	chemicals, etc., readil	ly available at	or near the
facility?	YES 'NO		
3. Waste Oil M	lanagement	The contract of the second second second second second second second second second second second second second	ave
a. Are was	ste oils kept separate f	from hazardous w	vaste, anti
freeze, and oth	ner types of wastes?	YES	NO
b. Are var	tious types of waste oil	segregated pro	operly?
YES	NO		
c. Are was	ste oil facilities prope	erly maintained	and
repaired?	YES NO	a se se	and the state
d. Is then NO	ce any excessive spillad	ge of waste oil:	? YES
e. Is ther	re excessive infiltratio	on of rainwater	into waste
oil collection	tanks and containers?	YES	NO
4. Comments:			



HAZARDOUS WASTE MANAGEMENT INSPECTION REPORT

DATE:
Organization being inspected:
Organization Point of Contact:
Phone Number:
Name of inspector/other inspection participants/phone#:
1. Evaluation of the organizations Hazardous Waste Management Program:
a. Has the Commanding Officer published written hazardous
waste management objectives, goals, policies and procedures?
YES NO
b. Has the Commanding Officer appointed a primary and at
least one alternate Hazardous Material Disposal Officer (HMDO)?
YES NO
c. Has the Commanding Officer established internal controls
to ensure ongoing compliance with BO 6240.5A? YES
NO (Describe how violations are handled)
d. Does HMDO have current listing of all sites where hazardous
wastes are handled?YESNO
e. Are quarterly inspections being conducted by HMDO per
BO 6240.5A?YESNO
f. Do records indicate that HMDO is providing follow up to
correct discrepancies identified by either HMDO's inspections,
or inspections conducted by external agencies? YES N



g. Regarding Hazardous Waste Training:

(1) Are training and training records adequate and completefor all primary and alternate HMDO's?YESNO

(2) Does HMDO have a current roster of hazardous waste handlers and managers at each site where hazardous wastes are generated, stored or otherwise handled? YES NO

(3) Are current up-to-date training records available in HMDO's files for each hazardous waste handler and manager?

YES NO

(4) Have any personnel worked as a hazardous waste handler or manager without direct supervision prior to having required training? YES NO

(5) Are all personnel provided adequate hazardous waste training within six months of date assigned to hazardous waste duties? _____YES _____NO

(6) Has HMDO notified cognizant Hazardous Material Disposal Coordinator (HMDC), in a timely manner of the training requirements for each newly assigned hazardous waste handler or manager? YES NO

(7) Are personnel training records maintained for at least three years after individual is relieved of hazardous waste related duties? YES NO

h. Regarding notification of hazardous waste activity:

(1) Have Waste Identification Documents (WID's) been properly submitted to HMDC on all hazardous waste? (Ref. 6240.5A)

YES NO

(2) Are properly completed WID's on hand? _____ YES

NO



ʻi ʻi	. Regarding processing of hazardous waste turn-in docum
	(1) Does HMDO inspect each waste prior to turn-in of
DD 13	18-1 to DRMO? YES NO
	(2) Does HMDO demonstrate knowledge of how to identif
and c	prrect discrepancies commonly associated with hazardous
waste	turn-in's? YES NO
	(3) Are Forms DD-1348-1 turned in to HMDO at or about
45 da	ys after "accumulation start dates"? YES
	(4) Does HMDO monitor and follow up on DRMO processin
of tu	n-in's?YESNO
	(5) Are HW physically transferred to DRMO within dead
lines	? YES NO
· .	
<u> </u>	
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Evaluation of Individual Hazardous Waste Generation, Handling and Storage/Accumulation Sites

L. Administration	ive:		
a. Name of	Site:		
Organiza	ation in charge:		
Respons	ible Official:	terri in an antiparta	
b. Adequac	y of hazardous waste manag	ement standard ope	erating
procedures (SOP):		
(1) Is	a written SOP available?	YES	NO
(2) Doe	s SOP provide names and ph	one numbers of cur	crent
HMDO's and HMDC	's?YES	NO	
(3) Doe	s SOP contain the followin	ıg?	
(a)	BO 6240.5A	YES	NO
(b)	BO 11090.1B	YES	NO
(c)	BO 11090.3	YES	NO
(b)	WID for each HW handled	YES	NO
(e)	HM/HW Spill/Emergency Pro	ocedures YES	NO
(f)	Copies of weekly inspections	YES	NO
(g)	Location sketch for each	HW generation, ac	cumula-
tion, and stora	age areas? YES	NO	
(h)	Material Safety Data Shee	ets or Hazardous M	aterial
Information Sys	stem for each HW?	YES NO	
(i)	Sample copies of turn-in	documents (Form D	D-1348-1)
and HW labels f	for each type of HW generat	ted? YES	NO
c. Are the	ere any HW handlers or mana	agers working at t	he site
who are not on	the HMDO's roster?	YES N	0
(If yes, attack	n a list of their names and	d the status of co	mpliance

with personnel training requirements of BO 6240.5A)



		DATE:	240
2. Con	dition of HW containers and relate	d storage area	
a.	Do all HW containers have the wor	ds "Hazardous Waste	e "
clearly	spelled out? YES	_ NO	
ь.	Are contents of all containers cl	early labeled?	YES
	NO		
с.	Is the accumulation date clearly	marked on each HW	
contain	er? YES NO		
d.	Is HW being removed from the site	in less than 90 da	ays?
	YES NO		
е.	Condition of containers:		
	(1) Leaking drums	YES	NO
	(2) Rusted drums	YES	NO
	<pre>(3) Dented or bulging drums</pre>	YES	NO
-	(4) Are all container bungs or caps in place	YES	NO
	(5) Are covers for open top drums bolted in place	YES	NO
f.	Is there any evidence of spills o	r leaks on the grou	und?
	YES NO		
g.	Are contingency plans posted and	currently updated a	at .
all sit	es? YES NO		
h.	Are weekly inspections of HM/HW b	eing conducted and	
correct	ive action noted properly?	YES NO	
i.	Are Spill Emergency Response sign	s posted?	ES
	NO (Ref. BO 11090.1B)		



· i Are:	adequate supplies of empty containers absorbents.
J. HICK	acquite supplies of empty containers, assorbance,
neutralizatio	on chemicals, etc., readily available at or near the
facility? _	YES NO
3. Waste Oil	l Management
a. Are t	waste oils kept separate from hazardous waste, anti
freeze, and o	other types of wastes? YES NO
b. Are	various types of waste oil segregated properly?
YES	NO
c. Are a	waste oil facilities properly maintained and
repaired?	YES NO
d. Is the second s	here any excessive spillage of waste oil? YES
e Ts ti	here excessive infiltration of rainwater into waste
e. 15 ci	here excessive infifteration of fullwater into wabte
oil collectio	on tanks and containers? YES NO
4. Comments	:
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and the second second	
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UNITED STATES MARINE CORPS MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA 28542-5001

IN REPLY REFER TO: 6240 LOG/HMDO 19 Nov 87

Assistant Chief of Staff, Logistics From: Assistant Chief of Staff, Facilities (NREAD) To:

Subj: DISPOSAL OF USED LITHIUM BATTERIES

- Ref: (a) CG MCB ltr 6240 NREAD of 2 Oct 87
 - (b) U. S. Dept of Transportation Exemption 7052 (DOT-E 7052)

A

- (c) MIL-STD-2073-1
- (d) BO P5400.3E

1. Per reference (a), this office has researched the problem of storing and transporting used lithium batteries. The below information applies:

a. Lithium batterie particularly any form of boxes provide minimal pi249 it is therefore recomme inside the original shi over-packed in a wooden

b. The use of the batteries is appropriat(original fiberboard bo: approved container is per reference (c). Va examples apply (dimens

NSN

8115 00 183 9497 8115 00 190 4865

10 c. Coordination between Natural Resources, the Defense Reutilization and Marketing Office (DRMO) and Preservation, Packaging, and Packing (PP&P) Platoon may ascertain standard specifications for containers utilized in handling and storage of used lithium batteries at DRMO. By selecting a limited number of approved fiberboard containers, PP&P may be able to design and construct custom-made wooden boxes suitable for over-packing. In the event a unit loses or can no longer use the original fiberboard box, units would procure both boxes from PP&P with a Packaging and Preservation Work Request (MCBCL 4030). This will ensure that the unit has the correct boxes on hand and only has to stop at one location. Additionally, PP&P may use the DOT approved fiberboard boxes for other uses/shipments.

ig Waste &4

d. Recommend that Natural Resources in conjunction with the Environmental Protection Agency (EPA) determine if the above fiberboard/wooden box combination is satisfactory.

Fiberboard ironment, s be stored) and

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d lithium). If the alent DOT 6, grade W5c as lable. The below 19340 1964/8MBO 19 Nov 17

> Masistant Chief of Staff, La istics Fo: Assistant Chief of Staff, Faoilities (WEAL)

(a) DC MCB LEE 5240 MERRO OF 2 OOL 87

(b) G. S. Bept of Transportation Frequition 7052 (DOT-E 7052) (c) MIL-STD-2073-1

(C) BO PS400.12

: 7 99

 Per reference (a), this office has researched the problem of storing and transporting used lithing batteries. The bilow information applies:

c. Lithium bate vies require protection from vie elements, serticularly any foun of moisture (rain, dew, vie). Fiberboard boxes provide minimal protection from the outside environment, it is therefore recommended that all lithium batteries be stored invice the original supping container (or equivalent) and over-packed in a vooren box.

b. The use of the original container to ship used lithium batteries is appropriate and approved by reference (b). If the original fiberboard box is lost or damaged, an equivalent DOC approved container is any box conforming to PP-D-536, great W5C as per reference (c). Various styles of boxes are available. The bolow examples apply (dimensions in inches):

VI	<u>.</u>	<u>10BM</u>	
8	10	T15 G0 183 9197	8
ð Í.	22	115 00 100 4055	8

c. Coordination between Natural Resources, the Delense Reutilization and Marketing Office (DSMO) and Procession, Packaging, and Focking (PSEP) Flatoon may accertain standard specifications for containers willized in manding and storage of used lithium batteries to DRGO. By selecting a limited number of approved fiberboard containers, PERP may be able to maring and construct custom-mule wooden nowes satuable for over-packing. In the event a unit loses or can no longer use the original fiberboard box, units would produce both boxes from PR&P with a Packaging and unit has the correct both boxes from PR&P with a Packaging and the boxes for events on band and only has to stop at one out the store both boxes on band and only has to stop at one boat has the correct boxes on band and only has to stop at one location. Additionally, PR&P may use the DCT approved fiberboard boxes for other uses/shipments.

d. Reportend that Natural Resources in conjunction with the Environmental Protection Agency (EPA) determine if the above fiberboard/wooden box combination is satisfactory.



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

IN REPLY REFER TO 6240 LOG/HMDO 19 Nov 87

From: Assistant Chief of Staff, Logistics Assistant Chief of Staff, Facilities (NREAD) To:

Subj: DISPOSAL OF USED LITHIUM BATTERIES

- Ref: (a) CG MCB ltr 6240 NREAD of 2 Oct 87
 - (b) U. S. Dept of Transportation Exemption 7052 (DOT-E 7052)
 - (c) MIL-STD-2073-1
 - (d) BO P5400.3E

1. Per reference (a), this office has researched the problem of storing and transporting used lithium batteries. The below information applies:

a. Lithium batteries require protection from the elements, particularly any form of moisture (rain, dew, etc.). Fiberboard boxes provide minimal protection from the outside environment, it is therefore recommended that all lithium batteries be stored inside the original shipping container (or equivalent) and over-packed in a wooden box.

The use of the original container to ship used lithium b. batteries is appropriate and approved by reference (b). If the original fiberboard box is lost or damaged, an equivalent DOT approved container is any box conforming to PPP-B-636, grade W5c as per reference (c). Various styles of boxes are available. The below examples apply (dimensions in inches):

NSN		Ŀ	W	<u>H</u>		
8115	00	183	9497	10	8	6
8115	00	190	4865	22	16	10

c. Coordination between Natural Resources, the Defense Reutilization and Marketing Office (DRMO) and Preservation, Packaging, and Packing (PP&P) Platoon may ascertain standard specifications for containers utilized in handling and storage of used lithium batteries at DRMO. By selecting a limited number of approved fiberboard containers, PP&P may be able to design and construct custom-made wooden boxes suitable for over-packing. In the event a unit loses or can no longer use the original fiberboard box, units would procure both boxes from PP&P with a Packaging and Preservation Work Request (MCBCL 4030). This will ensure that the unit has the correct boxes on hand and only has to stop at one location. Additionally, PP&P may use the DOT approved fiberboard boxes for other uses/shipments.

d. Recommend that Natural Resources in conjunction with the Environmental Protection Agency (EPA) determine if the above fiberboard/wooden box combination is satisfactory.

G240 LOG/AMDO 19 Nov 87

Att.

Yrom: Assistant Chief of Staff, Lovistics Po: Assistant Chief of Staff, Faoilities (WREAD)

Buby: DISPOSAL OF USED LITHIUM BATTREES

Ret: (3) CG MCP LEI 6240 MPEAD OF 2 OOL 87

(b) G. S. Dept of Pransportation Exception 7052 (DOT-E 7052)
 (c) MIL-STD-2073-1

S1.00\$89 08 (5)

 Per reference (a), this office has researched the problem of shoring and transporting used lithius batteries. The briow information apply st.

EL STE HAR

a. Lithium bait vies require protection from the elements, particularly any form of wisture (rain, dow, etc.). Superboard hoxes provide minimal protection from the outside anvironment, it is therefore recommended that all lithium batteries be stored invide the original anipping container (or equivalent) and over-packet in a vooren boy.

b. The use of the original container to ship used lithium batteries is appropriate and approved by reference (b). If the original fiberboard by it lost or damaged, an contvalent DO approved container is any bet conforming to PPP-E-636, grade Wet as per reference (c). Various styles of boxee are available. Not it low examples apply (dimonstrues in inches):

Herlin	W.	<u>i</u>		<u>684</u>	
2	8	10	9197	00 183	arts
1.0	15	22	4855	001 190	8115

c. Coordination between Natural Resources, the Delense Reactifization and Marketing Office (D8MO) and Everevation, Packaging, and Lucking (PaR) Flatoon may ascertain standard specifications for containers withired in manifing and storage of used lithium batteries to DRO. If solecting a limited number of approved Geneticard containers, Phar may be able to assign and construct customemele wooden mores taitable for over-packing. In the work a unit losses of can no longer use the original Floerboard hor, hubbe would provide both boxes from PR&P with a Packaging and preservation Worl Lequest (MCBCL 4038). This will ensure the the whit has the gorreat boxes on hand and only has to stop at one location. Additionally, PR&P may use the DC approved fiberboard boxes for other uses/shipments.

de, Repensend Cat Natural Resources in conjunction with the Covironmental Pricetion Agency (EPA) detarain if the above floutboard/wooden boy contination is satisfactory. 2. Traffic Management Office will have no difficulties in transporting used lithium batteries if the above is promulgated as guidance.

3. Since this problem is a hazardous waste policy issue, request Natural Resources coordinate the final resolution of this matter. Reference (d) is germane.

4. Questions concerning this matter may be directed to Capt Peters, extension 2535/6.

Chambles

B. D. CHAMBLESS

Copy to: TMO OIC, DSSC OIC, PP&P DRMO Traftic Management Office will have no difficulties in transporting used lithium batteries if the above is produlgated as guidance.

 Since this problem is a hazardous waste policy issue, request Natural Resources coordinate the final resolution of this matter. Seference (d) is germane.

4. Questions concerning this matter may be directed to Capt Poters, extension 2535/6.

L. D. CHAMBERS

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Copy to: TMO OIC: DSGC OIC, PP&P DRMO OPNAV 5216/144A (Rev. 8-81) \$/N 0107-LF-052-2320



DATE: 14 Dec 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: MIP PROPOSALS; COMMENTS ON

Ref: (a) AC/S FAC ltr 11800 FAC of 20 Nov 87 (b) ENSAFE Study, Contract No N62470-85-4779 (First Draft dtd 9 Jun 86)

Encl: (1) MIP Proposal 88-CLNC-015-FAC (2) MIP Proposal 86-CLNC-140-FAC

> 1. Enclosure (1) has been reviewed per reference (a). The concept contained therein is essentially a "waste, fraud and abuse" indictment of the Defense Reutilization and Marketing Office/Region/Service contracting mechanism. Enclosure (1) tends to restate information provided by reference (b). The potential savings in this area are so great that it is recommended that BOSMAD audit/formally study the disposal of used oil, hazardous material and hazardous waste and make interim and long term recommendations relative to local disposal, contracting, cost reduction and allocation of cost to generating organizations.

2. Enclosure (2) has been reviewed per Ms. Debbie Martin, BOSMAD, request of 11 Dec 87. It is recommended that enclosure (2) be disapproved in that it:

a. It restates recommendations contained in reference (b), and

b. can be accomplished within existing policies, procedures and contraints.

JULIAN I. WOOTEN



	MODEL INSTALLATION PROGR PROPOSAL MARINE CORPS BASE	RAM
	CAMP LEJEUNE	July 1
INSTRUCTIONS: 1. COMPLETE ALL INFORMA	TION REQUESTED.	DO NOT WRITE IN THIS SPACE
2. PLEASE PRINT OR TYPE I 3. USE ADDITIONAL SHEETS 4. FORWARD COMPLETED F	EGIBLY. S IF NECESSARY. ROPOSAL TO AC/S, BOSMAD, MCB	5 Nov 87
TITLE OR SUBJECT OF PROP	OSAL	PROPOSAL NUMBER

Waste Petroleum Product Disposal

NAME, TITLE, GRADE/RANK OF SUBMITTER(S)

Donald R. Gurganus, Transportation General Foreman WS-13, Base Maintenance

CURRENT PROCEDURE

At the present time the Department of the Navy is funding DLA to depose of contaminated waste petroleum products. The cost for DRMO to dispose of Marine Corps Base's last two contracts were 158,535 gallons at a price of \$1.68 per gallon, and 188,269 gallon through 27 October 1987 at a cost of 2.70 per gallon. The total cost to remove this 346,804 gallons was 774,665.10.

PROPOSED PROCEDURE (If a directive/order must be waived to implement proposal-Identify the specific reference.)

SEE ATTACHED SHEET:

BENEFITS/ADVANTAGES

SEE ATTACHED SHEET:

I (WE) UNDERSTAND THAT THE ACCEPTANCE OF A CASH AWARD FOR THE USE OF THIS PROPOSAL BY THE UNITED STATES GOVERNMENT SHALL NO FORM THE BASIS OF A FURTHER CLAIM OF ANY NATURE UPON THE UNITED STATES BY ME (US), MY (OUR) HEIRS, OR ASSIGNS.

(SIGNATURE AND DATE,

(SIGNATURE AND DATE)

MODEL INSTALLATION PROPOSAL MCBCL 11800

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88-CLNC-015-FAC

5909

PHONE



PROPOSED PROCEDURE

It is proposed that DLA and DRMO exhaust all possible alternatives to acquire quotes and contracts with facilities which are an end user of waste petroleum products. It is evident from the information listed, that brokers such as Waste Conversion, are very profit oriented.

Oldover Corporation located in Norwood, North Carolina and Cascade, Virginia is an end user of waste petroleum products. They have facilities located in North Carolina which can utilize wasted petroleum products which are contaminated to a maximum of two (2%) by volume, and a maximum of ten (10%) by volume in Cascade, Virgina. Aslo in Alabama they own a blending plant which can process waste oil products which are even higher in contaminates.

BENEFITS/ADVANTAGE

Cost to dispose of the last completed contract and the cost incurred on the present contract through 27 October 1987.

158,535 Gal	188,269 Gal through 27 Oct 87
1.68 Per Gal. Cost	2.70 Per Gal Cost
266,388.80	508,326.30

Oldover Corporation standard price according to Shirley Warsham, fuel Specialist was \$.28 per gallon, Transportation charge of \$1.90 per mile round trip.

346,804 Gal.

.28 Cost per Gal.

346,804 Gal. 6,000 Gal. per load

97,105.12

57.8 Trips

Estimates Miles per Round Trip: 500

58 Trips

29,000 Total Miles 1.90 Cost per Mile

152,205,12

55,100.00

Cost to Disposed by Waste Conversion:	266,338.80 508,326.30
	774,665.10
Estimated Cost to Dispose through and	End User:
Cost to Dispose of Waste Petroleum: Transportation Cost:	97,105.12 55,100.00

Cost	to	Dispose	through Broker:	774,665.10
COSL	10	DISPOSE	TOTAL NET SAVINGS:	622,459.98



BENEFITS/ADVANTAGES CONTINUED:

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In the long run and in view of the Federal Budget deficit it is imperative that Camp Lejeune, Headquarters Marine Corps, Department of the Navy, and Department of Defense seriously consider alternatives such as funding the construction of an incinerator to dispose of waste petroleum products. Should this facility be approved and permitted by EPA, it could be constructed to accomodate all Department of Defense activities located in North and South Carolina. If this incinerator was constructed to accodmodate Steam Generation at Camp Lejeune it could greatly reduce the energy cost.

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	MODEL INSTALLATION PROGRA PROPOSAL MARINE CORPS BASE CAMP LEJEUNE	M
INSTRUCTIONS: 1. COMPLETE ALL INFORM 2. PLEASE PRINT OR TYPE 3. USE ADDITIONAL SHEET 4. FORWARD COMPLETED	DO NOT WRITE IN THIS SPACE DATE RECEIVED	
TITLE OR SUBJECT OF PRO WASTE PETROLE	PROPOSAL NUMBER 86-CLNC-140-FAC	
NAME, TITLE, GRADE/RANK Donald R. Gur Heavy Equipment	рноме 5909	
CURRENT PROCEDURE Waste oil and from five gal	petroleum products are stored at units in con lons to 500 gallons with no specific location.	tainers in sizes

PROPOSED PROCEDURE (If a directive/order must be waived to implement proposal-Identify the specific reference.)

That Base request information from units which generate waste oil/fuel and install containers in 500 and 1,000 gallon sizes which are color coded.

BENEFITS/ADVANTAGES

A schedule could be prepared and the products picked up on a schedule. Seperation of oil from fuel, and product could be sold, rather than 1. 2. paying to have it disposed of.

Reduce equipment and labor cost to pick-up small quantities. Re-utilize inefficient labor into other areas. 3.

4.

I (WE) UNDERSTAND THAT THE ACCEPTANCE OF A CASH AWARD FOR THE USE OF THIS PROPOSAL BY THE UNITED STATES GOVERNMENT SHALL NOT FORM THE BASIS OF A FURTHER CLAIM OF ANY NATURE UPON THE UNITED STATES BY ME (US), MY (OUR) HEIRS, OR ASSIGNS.

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(SIGNATURE AND DATE)

MODEL INSTALLATION PROPOSAL MCBCL 11800

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DRMD CAMP LEJEUNE NC

NAVDENCLINIC CAMP LEJEUNE NC

ADMINISTRATIVE MESSAGE

ROUTINE

R 201901Z AUG 87 Z

FM CG MCB CAMP LEJEUNE NC

TO CMC WASHINGTON DC

INFO CG SECOND MARDIV CG II MAF CG SIXTH MAB NAVHOSP CAMP LEJEUNE NC LANTNAVFACENGCOM NORFOLK VA MCB CAMP LEJEUNE NC

UNCLAS //N06280// SECTION 01 DF 03 //N06280//

CMC//CODEXLFL//LANTDIV FOR 2032// SUBJ: HAZARDOUS WASTE MANAGEMENT PROGRAM, REPORT OF NOTICE OF VIOLATION

A. MCD P11000.68 B. CG MCB CAMLEJ NC 052154Z MAR 87

1. IN ACCORDANCE WITH REF A, THE FOLLOWING INFORMATION IS SUBMITTED DN THE SUBJ MATTER. A COMPLIANCE ORDER, DOCKET NO. 87-493 WAS ISSUED TO MARINE CORPS BASE, CAMP LEJEUNE, NC ON 11 AUG 1987, RECEIPTED BY THIS COMMAND ON 17 AUG 1987, FOR CERTAIN VIOLATIONS OF THE NORTH CAROLINA SOLID WASTE MANAGEMENT ACT AND RULES, N.C.G.S. 130A, ARTICLE 9 (ACT), AND THE NORTH CAROLINA HAZARDOUS WASTE MANAGEMENT RULES, 10 NCAC 10F (RULES).

DLVR:CG SIXTH MAB(7)...INFD DLVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...INFD DLVR:NAVHDSP CAMP LEJEUNE NC(4)...INFD DLVR:DRMD CAMP LEJEUNE NC(4)...INFD DLVR:HQ NUC II MAF(7)...INFD

BFAC(2)...DRIG FOR CG MCB CAMP LEJEUNE(117) DICR(1) BCDS(1) BSDD(1) CEDA(1) GSTF(12) SSTF(85) DCDR(14)

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

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

A. 40 CFR 262.34(A), CODIFIED AT 10 NCAC 10F .0030, STATES THAT EXCEPT AS PROVIDED IN PARAGRAPHS (D), (E) AND (F) DF 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 T 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), CUDIFIED 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

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

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

40 CFR 265.16(C), CUDIFIED AT 10 NCAC 10F .0033, STATES THAT FACILITY PERSONNEL MUST TAKE PART IN AN ANNUAL REVIEW OF THE INITIAL TRAINING REQUIRED IN PARAGPAPH (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 FACILITIES 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), CUDIFIED 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 NCAS 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:

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ADMINISTRATIVE MESSAGE

ROUTINE

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FM CG MCB CAMP LEJEUNE NC

TO CMC WASHINGTON DC

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

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

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

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

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

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

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

BFAC(2)...DRIG FOR CG MCB CAMP LEJEUNE(117) DICB(1) BCDS(1) BSDD(1) CEDA(1) GSTF(12) SSTF(85) DCDR(14) /13/

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(B) 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 10 .0030, IN THAT IT HAS NOT DETERMINED IF THE SOLID WASTES IT GENERATES ARE HAZARDOUS WASTES.

G. PERMIT CONDITION - PART IF 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 MARSHAL.

CAMP LEJEUNE IS IN VIOLATION OF PERMIT CONDITION - PART II L 3, IN THAT THE BASE FIRE CHIFF 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) DF THE ATTACHMENT, DESCRIPTION OF CONTAINERS, STATES THAT CONTAINERS USED TO STORE HM AT THE DPDD ARE EITHER THE ORIGINAL SHIPPING CONTAINER OF A DOT-APPROVED CONTAINER, AS LISTED IN 49 CFR 100.

CAMP LEJEUNE IS IN VIOLATION OF PERMIT CONDITION PART IIIC 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 3005RA) 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.

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

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

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

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

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

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

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

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

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

6. TWO SIGNIFICANT ISSUES REMAIN AS FOLLOWS:

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

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

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ADMINISTRATIVE MESSAGE

ROUTINE

R 2019012 AUG 87 ZYB

FM CG MCB CAMP LEJEUNE NC

TO CMC WASHINGTON DC

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

UNCLAS FINAL SECTION OF 03 //N06280//

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

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

BT

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

BFAC(2)...DRIG FOR CG MCB CAMP LEJEUNE(117) DICB(1) BCDS(1) BSDT(1) CEDA(1) GSTF(12) SSTF(85) DCDR(14)

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TO: CG II MAF					
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A. BO 6240.5A .					
B. NCAC, LOF, NC HW MGT RULES					
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ED TO HAZAROMUS MATERIAL DISPOSAL COORDINATORS (HMDC) SATISFIES RE-QUIREMENTS OF THIS SECTION.

3. THE FOLLOWING STANDARDS ON TIME LIMITS FOR PREPARATION OF HW TURN-IN DOCUMENT{S} AND PROCESSING HW TURN IN'S ARE EFFECTIVE IMME-DIATELY.

A. FORM DD 1348-1 SHALL BE PREPARED AND SUBMITTED TO COGNIZANT HAZARDOUS MATERIAL DISPOSAL OFFICER {HMD0} NLT THE EARLIEST OF THE FOLLOWING:

{1} TEN CALENDAR DAYS OF THE DATE CONTAINER IS FILLED OR;

{2} BY 45 DAYS AFTER THE "ACCUMULATION START DATE" EVEN IF CONTAINER IS NOT FULL.

B. HMDO SHALL PROCESS FORM DD L348-L SUBMITTED PER PAR 3A ABOVE IN ACCORDANCE WITH ENCL {L} OF REF {A} AND HAND DELIVER TO DRMO WITH-IN FIVE CALENDAR DAYS OF THE DATE RECEIVED BY HMDO.

C. DRMO SHALL PROCESS FORM DD 1348-1 AND EITHER ACCEPT ACCOUNT-ABILITY FOR THE HW, OR PROVIDE HMDO WITH A WRITTEN REJECTION SPECIFY-ING DEFICIENCIES WITHIN 10 CALENDAR DAYS OF THE DATE FORM DD 1348-1 IS RECEIVED BY DRMO. DRMO SHALL PROVIDE COPY OF REJECTION NOTICE TO COGNIZANT HMDC, AND DIRECTOR, NREAD.

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DAYS AFTER DATE DRMO ACCEPTS ACCOUNTABILITY FOR THE HW BY SIGNING FORM DD 1348-1.

E. AC/S LOGISTICS SHALL PICK UP AND TRANSPORT HW TO TP-451/TP-463 Complex within ten calendar days of date drod requests transportation.

4. THE FOLLOWING REPORTS AND INTERNAL CONTROLS SHALL BE INITIATED IMMEDIATELY:

A. COMMANDERS HAVING PHYSICAL CUSTODY OF CONTAINERS OF HWA SHALL MONITOR ALL HW STORAGE AREAS WEEKLY AND SHALL NOTIFY HMDC VIA CHAIN OF COMMAND IN WRITING OF ANY CONTAINERS ON HAND THAT:

{]} HAVE ACCUMULATION START DATES OVER 50 DAYS OLD AND A FORM DD-1348-1 HAS NOT BEEN SUBMITTED OT DRMO;

{2} HAVE ACCUMULATION START DATES OVER LO DAYS OLD AND DRMO HAS NOT ACCEPTED ACCOUNTABILITY; OR

{3} HAVE ACCUMULATION START DATES OVER 75 DAYS OLD.

B. COMMANDERS WITH PHYSICAL CUSTODY OF HW ARE RESPONSIBLE FOR INITIATING CORRECTIVE ACTION IN EACH INSTANCE WHERE DRMO HAS NOT

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ACCEPTED ACCOUNTABILITY WITHIN LO DAYS AFTER ACCUMULATION START DATE. C. HMDCO: DRMO AND AC/S LOG REPS SHALL NOTIFY THE DIRECTOR, NREAD BY TELEPHONE, CONFIRMED IN WRITING TO CG MCB, ATTENTION AC/S FAC, IMMEDIATELY UPON DISCOVERY OF A CONTAINER WITH ACCUMULATION START DATE OVER 75 DAYS OLD WHICH HAS NOT BEEN PHYSICALLY TRANSPORTED TO THE TP-451/TP-463 COMPLEX.

5. POC WITH THIS MATTER IS MR. DANNY SHARPE, NREAD, EX 2083/1690 OR 2195.

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Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune, North Carolina 28542-5001 Resident Officer in Charge of Construction

RESPONSE TO STATE OF NORTH CAROLINA COMMENTS ON WELL 615

Encl: (1) NC Div of Hlt Svc ltr dtd 17 Nov 87

1. Request you provide the information as required in paragraphs 1 - 5 of the enclosure. Coordination with the Base Maintenance Officer, Utilities Branch and NREAD is required to complete this information.

2. Please advise this office by 7 December 1987 of the date which you anticipate data to be complete. Our POC is Bob Alexander, extension 3034.

K. J. KIRIACOPOULOS By direction

Copy to: BMO > NREAD



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James G. Martin, Governor David T. Flaherty, Secretary Ronald H. Levine, M.D., M.P.H. State Health Director

November 17, 1987

Colonel T. J. Dalzell Assistant Chief of Staff Facilities by Direction of Commanding General U.S. Marine Corps Camp Lejeune, North Carolina 28542-5001

> Re: 6280 FAC "As Built" Well #615 Camp Lejeune Marine Corps Base Onslow County

Dear Colonel Dalzell:

We thank you for your letter of October 15, 1987 along with the information for the referenced project. After the review, we make the following comments:

- 1. Three (3) copies of "Application for Approval..." forms must be properly completed and signed, then submitted to this office.
- Three (3) copies of revised plans and detailed specifications must be prepared by a Professional Engineer licensed to practice in the State of North Carolina. The plans and specifications shall bear an imprint of the registration seal of the engineer.
- The chemical analysis must be done by the Laboratory that's certified by N.C. Division of Health Services. The chemical test results must include 24 parameters.
- The bacteriological test must be done by the Laboratory that's certified by N.C. Division of Health Services. The result must be recorded in the company's letterhead.
- 5. Is the well water pumped into the water treatment plant for treatment or distributed directly to the service connection? For the latter, the chlorination is required. Details must be depicted on the drawings.

We shall continue our review upon receipt of the aforementioned information and revisions. If you have any questions, please call (919) 733-2460.

NREAD

VES



Page Two

Sincerely,

l

Heinrich S. Ou Environmental Engineer Plan Review Unit Public Water Supply Branch Environmental Health Section

CC: Mike Bell, Regional Engineer Bob Alexander

HSO/cj



Department of Human Resources Division of Health Services

Application For Approval of Plans And Specifications For Water Supply Systems

DATE.

(DHS Use Only)

SERIAL NO ...

(DHS Use Only)

To The Division of Health Services Department of Human Resources:

The	uthorized official and title, or owner)
of	anitary district, water company, or other)
in the County of	State of North Carolina authorized by law to
act for the said	poration, sanitary district, water company, or other)
and to expend its funds for the water project desc	ribed below, herewith submit for the counsel and advice
of the Division of Health Services plans and specif	fications prepared by(engineer or firm)
for the installation or construction of	(describe project)
	(location of project)
(county) for the approval of such feature of said plans and s of public water supplies.	with make application to the Division of Health Services specifications as relate to public health and the protection
These plans have been approved and accepted by	the applicant.
This application is made under and in full accord Carolina General Statutes, and such other statutes change or deviation from the plans and specificat made except with the written consent and appro- representative. Remarks:	d with the provisions of Chapter 130A-317 of the North s as relate to water systems. The applicant agrees that no ions approved by the Division of Health Services will be oval of the Division of Health Services or its authorized
	(Signature of Owner, Manager, Mayor, or Chairman)
to doctory	(Type or Print Name Signed Above)
A BANK AND A	(Street or Box Number)

State

These plans and specifications cited in the foregoing application are hereby approved insofar as the protection of public health is concerned as provided in the regulations, standards and criteria adopted under the authority of Chapter 130A-317 of the General Statutes, with the following provisos:

This approval is given with the understanding that upon installation of such works, its operation shall be placed under the care of a competent person, and the operation shall be carried out according to best accepted practice and in accordance with the recommendations of the Division of Health Services.

Signed:....

Title:

Chief, Environmental Health Section

DHS-2136 (Revised 7/87) PUBLIC WATER SUPPLY BRANCH (Review 7/90)



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SUBJ: UNAUTHORIZED DISPOSAL OF HAZARDOUS WASTE (HW) INTO WASTE OIL

BY MAG 26 AND MAG 29 AIRCRAFT MAINTENANCE OPERATIONS A. DIV OF HEALTH SERVICES HW COMPLIANCE ORDER DTD 11 AUG 87 B. BO 6240.5A

1. COOPERATIVE EFFORTS BY MCB AND MCAS, NEW RIVER, ENVIRONMENTAL PERSONNEL HAVE IDENTIFIED THE SUBJ DISPOSAL AS THE DIRECT CAUSE OF CONTAMINATION OF HUNDPEDS OF THOUSANDS OF GALLONS OF WASTE OIL WITH HALOGENATED SOLVENTS AND DEGREASERS. THE MOST SIGNIFICANT IS FREON FROM "PATCH TESTS" ON AIRCRAFT HYDRAULIC SYSTEMS. THE COOPERATION BY MAG 26, MAG 29 AND MCAS NEW RIVER IN ADDRESSING THE SUBJECT ISSUE ARE APPRECIATED.

2. THE SUBJECT ACTIVITY LED TO THIS CMD BEING CITED FOR VIOLATIONS OF STATE AND FEDERAL HW REGULATIONS AND THE ISSUANCE OF REF {A}.

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 D. SHARPE

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TO: CO MCAS NEW RIVER NO

INFO CG SECOND MAW

CO MAG 26

CO MAG 29

UNCLAS //NOL240//

SUBJ: UNAUTHORIZED DISPOSAL OF HAZARDOUS WASTE (HW) INTO WASTE OIL

BY MAG 26 AND MAG 29 AIRCRAFT MAINTENANCE OPERATIONS DIV OF HEALTH SERVICES HW COMPLIANCE ORDER DTD 11 AUG 87 Α. R. B0 6240.5A

1. COOPERATIVE EFFORTS BY MCB AND MCAS, NEW RIVER, ENVIRONMENTAL PERSONNEL HAVE IDENTIFIED THE SUBJ DISPOSAL AS THE DIRECT CAUSE OF CONTAMINATION OF HUNDPEDS OF THOUSANDS OF GALLONS OF WASTE OIL WITH HALOGENATED SOLVENTS AND DEGREASERS. THE MOST SIGNIFICANT IS FREON FROM "PATCH TESTS" ON AIRCRAFT HYDRAULIC SYSTEMS. THE COOPERATION BY MAG 2L, MAG 29 AND MCAS NEW RIVER IN ADDRESSING THE SUBJECT ISSUE ARE APPRECIATED.

THE SUBJECT ACTIVITY LED TO THIS CMD BEING CITED FOR VIOLATIONS 2. OF STATE AND FEDERAL HW REGULATIONS AND THE ISSUANCE OF REF {A}.

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ADDRESSEE ISOREQUESTED TO PROVIDE A WRITTEN SUMMARY OF ACTION TAKEN AND PLANNED TO ADDRESS THE FOLLOWING:

A. ENSURE PROPER COLLECTION, SEGREGATION AND DISPOSAL OF THE SUBJ HW PER REF {B} AND

B. PREVENTING THE DISPOSAL OF HW INTO WASTE OIL COLLECTION CON-TAINERS AND TANKS.

THIS CMD CANNOT OVER EMPHASIZE THE IMPORTANCE OF ENSURING ONGOING RESOLUTION OF THE SUBJ PROBLEM. A REPONSE IS REQUESTED NLT 26 NOV 1987. POC WITH THIS MATTER IS MR. DANNY SHARPE, NREAD, EXTENSIONS 2083 AND 2195.

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12000 NREAD

From: Supervisory Ecologist, Soil, Water and Environmental Branch To: Supervisory Chemist, Environmental Chemistry and

Subj: HAZARDOUS WASTE (HW) MANAGEMENT PROGRAM

Microbiology Section (ECMS)

Ref: (a) BO 6240.5A (b) MCO 6280.8

1. Be advised that effective immediately, Mr. Tom Barbee, GS-9, Environmental Control Specialist, is detailed to work for a period of ninety days under the direction of Ms. Glenee Smith, Environmental Control Specialist, GS-11. The purpose of the detail is to accomplish priority work in the areas of HW minimization and preparation of waste identification documents (WIDs) per references (a) and/or (b).

2. Be advised that Mr. Barbee shall be available upon request by addressee and approval by the Supervisory Ecologist to assist in high priority work assignments to the ECMS. Any unresolved problems should be brought to my attention immediately.

DANNY D. SHARPE

Copy to: Glenee Smith Tom Barbee Dir, NREAD





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

IN REPLY REFER TO: 5200 NREAD 12 Nov 87

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

Subj: PESTICIDE STORAGE ROOM AT BLDG 907

Encl: (1) Dir, Oprns Br, BMD memo undated (provided to D. Sharpe, NREAD, on/about 19 Oct 87)

1. The enclosure has been reviewed as requested by Mr. Tim Jewell, Base Maintenance Division. We see no environmental constraints on construction of the subject storage room. Recommend review by Safety, Fire Protection and Preventive Medicine officials. There may be some personnel complaints associated with pesticide odors.

2. Point of contact is Mr. Danny Sharpe, x2083.

CHARLES D. PETERSON Acting



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MCB CLNC BLDG 907				ESTIMATED BY			CATEGORY CODE NUMBER		
CONSTRUCT PESTICIDE STORAGE K	STATUS OF DESIGN FINAL Other (Specify)			JOB ORDER NUMBER					
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We could use this work right here in Base Maint-Mason shop Metal Shops We would need some one to SIZE the exhaust far.

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

FROM: (Name, org. symbol, Agency/Post)) .	Room NoBidg.		
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5041-102 S/N 0107-LF-000-4100 GPO: 1984-705-012/17826 2-1		OPTIONAL FORM 41 (Rev. 7-76) Prescribed by GSA FPMR (41 CFR) 101-11.206			



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ROUTING SLIP





UNITED STATES MARINE CORPS 2d FORCE SERVICE SUPPORT GROUP (REIN) FLEET MARINE FORCE, ATLANTIC CAMP LEJEUNE, NORTH CAROLINA 28542-5701

IN REPLY REFER TO:

11000 4

SEP 4 1987

FIRST ENDORSEMENT on CO 2d SupBn's ltr 4790 over SER 4/27770 dtd 19 Aug 87

From: Commanding General

To: Commanding General, Marine Corps Base, Camp Lejeune, North Carolina 28542 (AC/S Facilities BMO)

Subj: CONSTRUCTION OF CONCRETE BLOCK WALLS

1. Forwarded, recommending approval based on the Base Fire Marshall recommendation to upgrade the fire conditions for the pesticide storage area of Bldg. 907.

U.W.R. V. WA RYAN JR. By direction

Copy to: CO, 2d SupBn



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

> In reply refer to: 4790 SER 4/27770 19 Aug 87

From: Commanding Officer, 2d Supply Battalion To: Commanding General, Marine Corps Base Camp Lejeune N.C. (AC/S Facilities BMD)

Via: Commanding General, 2d Force Service Support Group (REIN) (6-4 FACD)

Subj: CONSTRUCTION OF CONCRETE BLOCK WALLS

Ref: (a) CO, Med Log Co. 1tr 4400/MLCS of 18 Aug 87

Encl: (1) CO, Med Log Co. 1tr 4400/MLCS of 18 Aug 87

1. Per the reference, the enclosure is forwarded for appropriate action, recommending the task as a troop training project.

2. We request direct liason between Eigth Engineer Support Battalion and this headquarters.

3. Point of contact is Sgt Henderson at extensions 3405/3418.

By direction C

Copy to: CD, Med Log Co.



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

> 4400 MLCS 18 AUG 1987

From: Commanding Officer, Medical Logistics Company To: Commanding Officer, 2d Supply Battalion (S-4)

Subj: HAZARDOUS MATERIAL STORAGE

As noted by the Base Fire Department and the Hezerdous Material Inspectors, a segregated area for pesticide storage is needed.

2. The proposed area is inside door #5 of Bldg 907. This will require the construction of two concrete block walls approximately 30ft long and 16ft high with a 10x10 fire resistant door.

3. In order to contain any spills that might occur, the entrance will have to be elevated 6-8" above the deck. A ramp over the elevation is required for using the fork lift.

4. An exhaust fan vented to the outside also required.

5. POC is HMCS POWERS ext 2059/5993.

T. R. DEFIBAUCH

Need a copy of this



SCO TO FACE OF BRICK

BLDG 907 180'-0"





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6240 NREAD 13 Nov 87

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

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

Subj: HAZARDOUS WASTE DISPOSAL CONTRACT

Encl: (1) DLA Contract No. DLA 200-88-D0033

1. The enclosure is the new contract utilized by the Defense Reutilization and Marketing Officer for disposal of hazardous waste and is provided for review and comment. Point of contact is Mr. Danny Sharpe, NREAD, extension 2083.

> C. D. PETERSON Acting

6240 NH346 13 NGV N

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6280/2 NREAD NOV 1 0 1987

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

Subj: HAZARDOUS MATERIAL/HAZARDOUS WASTE (HM/HW) MANAGEMENT

Ref: (a) CG MCB 201901Z AUG 87 (b) BO 6240.5A (c) MCO 6280.8 (d) BO P5100.3F

1. During a recent meeting of the East Coast Regional Review Board, the subject topic was presented by senior Marine Corps and Navy officials as one of the most significant and costly issues facing activity commanders. Additionally, several local incidents have increased awareness throughout all of the Marine Corps Commands located within the Camp Lejeune/Marine Corps Air Station, New River complex. The most notable is the issuance of a HW compliance order by the North Carolina Division of Health Services (DHS) on 11 August 1987. Reference (a) summarizes the basis of the enforcement action by DHS.

2. A logical step toward solving this problem is to reduce the quantity of hazardous waste generated. Our current procedures require units throughout Base to separate storage areas for various types of waste material. Regular inspections are conducted to ensure compliance with reference (b). Even with the above efforts, HM/HW management continues to cost more in manpower and other resources.

3. Higher headquarters and DHS regulations require activity Commanders to use good management practices to reduce both the volume and toxicity of hazardous waste generated to the maximum extent practical and economical. Reference (c) outlines CMC expectations relative to the minimization of volume and toxicity of HW.

4. The purpose of this letter is to request action to develop an activity program to implement reference (c). Specifically, you are requested to activate the Hazardous Material Control Committee provided in Chapter 7 of reference (d) as a working group to develop a Camp Lejeune HW minimization program. The group should involve the Hazardous Material Disposal Coordinators for Base, Division, MCAS, and 2D FSSG as advisors and the Defense Reutilization and Marketing Officer as a member. RASSIA

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NREAD

Subj: HAZARDOUS MATERIAL/HAZARDOUS WASTE (HM/HW) MANAGEMENT

5. Point of contact for this matter is Ms. Glenee Smith, Natural Resources and Environmental Affairs Division, at extensions 2038/1690.

> T. J. DALZELL By direction

Copy to: Dir, NREAD BSafety Officer DRMO HMDC, MCB HMDC, MCAS, NR HMDC, Division HMDC, 2D FSSG



6240 NREAD 9 Nov 87

The Ansul Company Marinette, Wisconsin 54143

Gentlemen:

This activity is responsible for the protection of the health and well being of its employees. To do this effectively, we maintain a file of chemical compositions of materials used. To complete our file, we are interested in obtaining a Material Safety Data Sheet on the following Products(s):

Ansulite, Aqueous Film forming foam (AFFF), Liquid Concentrate, Fire extinguishing agent liquid. NSN 4210-01-056-8343

We are required to treat information concerning a proprietary product's composition as confidential. This information will be used only for the purpose of protecting the health and safety of our employees and for the security of U. S. Government property.

Should you find it necessary to withhold the exact formulaiton of your product, we would appreciate receiving a list of ingredients and an approximate percentage composition. For example, if the exact formulation of a material is:

Methylene Chloride	50%
Methyl Ethyl Ketone	35%
Toluene	14.5%
Benzene	00.5%

an acceptable completion of Section II could be

Methylene Chloride	Over	40%	S. Same
Methyl Ethyl Ketone	20 -	40%	In CA
Toluene	Less	than	25%
Benzene	Trace		

A reply is desired as soon as possible. Your cooperation is appreciated.

Sincerely,

C. D. PETERSON Acting

1110 Assal Company Nacincite, Wisdonsin 20113

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North Carolina Department of Human Resources Eastern Regional Office • 404 Saint Andrews Drive • Greenville, N. C. 27834

James G. Martin, Governor

David T. Flaherty, Secretary

November 3, 1987

Commander General Marine Corp Base Camp Lejeune, NC 28542

ATT: Director NREAD

Dear Sir:

On a recent visit to your facility, I discussed with members of NREAD staff and maintenance personnel requirements necessary for the base to come into compliance with tank regulations as they relate to the accumulation and storage of waste oil that has been confirmed to be hazardous waste due to the presence of chloronated hydrocarbons. As preliminary information has determined that waste oil from the Air Station contained chlorinated solvents from a testing procedure performed at the Air Station, it is necessary that all waste oil remain at the Air Station facility until such time that testing of each batch or tank load of oil can determine whether or not the oil is hazardous waste.

For the oil that has been tested and found to be hazardous waste, an inspection program must be implemented to ensure the hazardous waste oil remains in the tanks and integrity of each tank remains intact.

Once each operating day, the following must be inspected:

- 1. overfill/spill/discharge equipment to ensure that it is in good working order;
- 2. above ground portions of tanks to detect corrosion or release;
- construction materials and the area immediately surrounding the tanks including dikes to detect erosion or signs of releases; and
- 4. the level of waste in the tank.



Page 2 November 3, 1987

An exception can be made to #4 if the discharge/fill valves are locked to ensure that no waste is added to or removed from any hazardous waste tank unless a person trained in hazardous management is present. The keys should remain with trained individuals in order to meet this requirement.

Any person making inspections should be properly trained according to 40CFR 265.16.

The above requirements should be followed until such time as all hazardous waste is removed from the tanks and the tanks are closed. The inspection records should be retained for a period of at least 3 years.

If you have questions regarding the storage of hazardous waste oil in tanks, please call on me.

Sincerely,

Richard L. Day 100

Richard L. Gay Waste Management Specialist Solid and Hazardous Waste Management Branch

sle

cc: Doug Holyfield Dave Ellison





North Carolina Department of Human Resources Eastern Regional Office • 404 Saint Andrews Drive • Greenville, N. C. 27834

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Richard L. Day on

Richard L. Gay Waste Management Specialist Solid and Hazardous Waste Management Branch

sle

cc: Doug Holyfield Dave Ellison





To: Supervisory Chemist, Environmental Chemistry and Microbiology Section (ECMS)

Subi: HAZARDOUS WASTE (HW) MANAGEMENT PROGRAM

Ref: (a) BO 6240.5A (b) MCO 6280.8

1. Be advised that effective immediately, Mr. Tom Barbee, GS-9, Environmental Control Specialist, is detailed to work for a period of ninety days under the direction of Ms. Glenee Smith, Environmental Control Specialist, GS-11. The purpose of the detail is to accomplish priority work in the areas of HW minimization and preparation of waste identification documents (WIDs) per references (a) and/or (b).

2. Be advised that Mr. Barbee shall be available upon request by addressee and approval by the Supervisory Ecologist to assist in high priority work assignments to the ECMS. Any unresolved problems should be brought to my attention immediately.

DANNY D. SHARPE

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28001 1987

Copy to: Glenee Smith Tom Barbee Dir, NREAD 1881 100 8%+

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Mr. Rick Shiver Groundwater Section North Carolina Division of Environmental Management 7225 Wrightsville Avenue Wilmington, North Carolina 28403

> RE: HADROT POINT FUEL RECOVERY PROJECT

Dear Mr. Shiver:

ALW

We are providing the enclosed scope of services for your information and review. A contract has been awarded to the firm of O'Brien and Gere Engineers, Incorporated of Landover, Maryland to evaluate the extent of fuel leakages and to prepare a final design document for recovery well or wells.

We estimate that this project will begin some time late in the month of October or early November. Your office will be supplied with monitoring well permit applications in advance of this work. Please feel free to contact Mr. Bob Alexander, Marine Corps Base Environmental Engineer, for additional details on this project.

Sincerely,

R. J. RIRIACOPOULOS Lieutenant Colonel, U. S. Marine Corps Director, Facilities Management Division By direction of the Commanding General

Copy to: LANTDIV (Code 114)

Blind copy to: w/o encl AC/S LOG PWO ≥ NREAD EnvEngr OCT & 7 1987

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6240 NREAD OCT 2 2 1987

Distant

- From: Commanding General, Marine Corps Base, Camp Lejeune To: Commanding General, 2D Force Service Support Group (REIN), Camp Lejeune
- Subj: USE OF SOLVENT RENTAL CONTRACT SERVICES
- Ref: (a) Resource Conservation and Recovery Act (b) BO 6240.5A
 - (c) MCO 6280

1. Addressee is advised that this command strongly supports the subject mechanism for providing parts degreasing capability to support maintenance operations. The subject mechanism is appropriate for those operations which must use solvents regulated as a hazardous waste, (HW) per references (a), (b), and (c).

2. The following advantages are provided by the subject mechanism:

a. The storage of the solvent as a HW is eliminated in that the solvent becomes a HW only at the time the contractor removes the container;

b. The cost of the contract is generally much less than the cost of solvent plus the current disposal costs;

c. HW minimization requirements of reference (c) are met;

d. The concept is looked upon very favorably by HW regulatory agencies; and

e. There will be a reduction in personnel training and administrative requirements at locations where solvents are the only waste stream.

3. There will be a requirement that cognizant Hazardous Material Disposal Coordinators, and Hazardous Material Disposal Officers work closely with base transportation authorities regarding HW shipping manifests which must be developed and signed during each service call. The contractor will provide the manifest, but a local official must sign as generator. This will be a relatively simple procedure, but it is critical that it be done properly.

4. Point of contact with this matter is Ms. Glenee Smith, Natural Resources and Environmental Affairs Division, at extensions 2083/1690.

> T. J. DALZELL By direction

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OCT 2 0 1987

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

6280/14 DM

HADNOT POINT FUEL RECOVERY PROJECT INITIATION

Ref: (a) Our memo 6280/14 FAC dtd 8 Oct 87

1. A site visit and reconnaissance will be performed on 26-27 October 1987 by a representative of O'Brien and Gere Engineers and LANTDIV (Code 114). Request your assistance in providing background information to initiate work included in task one as described in the reference.

 For PWO and CEO: Specifically request you provide as-built drawings and location of underground utilities in the project area as needed by the consultant.

3. POC is Bob Alexander, extension 3034.

T. J. DALZELL

Copy to: CEO PWO >NREAD BNO EnvEngr

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





DATE: 16 Oct 87

FROM: Supvy Chemist, EC and MS, Environmental Branch, NREAD

TO: MEMO TO THE RECORD

SUBJ: COMMENTS ON SEA MARKING DYE SPILL AT TC-774 ON 27 AUG 87

1. On 27 Aug 87, Tom Barbee and I responded to a spill of an unknown substance at Bldg TC-774. The only information provided was it was a red substance that turned green when added to water. It took us approximately 40 minutes from the time we received the call to arrive at the spill site.

2. When I arrived, I noted the following:

a. At the intersection of 7th and G Street, there was the Fire Dept Command Vehicle (White van).

b. An ambulance was located there (a 2nd one arrived later).

c. Engine No. 6 was located on G Street across from the Command Vehicle.

d. No MP's were there.

e. Marines were everywhere, including two LtCol's who walked right up to the spill.

f. Chief Piner was in the background.

g. I checked in with Asst Chief Bright, he relayed that they still did not know what it was and that they were trying to maintain a secure buffer area.

h. A supervisor from Roads and Grounds was at the edge of spill.

3. Shortly after I arrived, a representative from the Ground Safety Office, MCAS-New River arrived, by driving her POV right down"G" Street pass the spill. She parked her car at the corner of 7th and G. She walked up to the spill and the Fire Capt had to catch up with her. She never checked in or out at the command center.

4. After Ground Safety arrived, an industrial hygenist from PMU arrived. He parked in the parking lot and walked up to the spill in regular work clothes. He never checked in or out at the command center. He did talk to Chief Piner after the substance was identified. He also talked tome before he left to say that he wasn't telling them how to dispose of it that he had told the Chief to see me and wanted to make sure I would tell them. I told him it was already taken care of.





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5. Base Safety arrived after the Industrial Hygenist. He checked in with the Command Center and then took his explosion meter over to the spill and got a reading of O lel, no explosive possibility. He stayed at the Command Center, however, he wanted to talk about a sale he had gone to recently in the area.

6. One MP finally arrived. He first checked in with the Ambulance Technicians and then the command center. Chief Bright told him what, how and when and also told him not to leave until he released him. A second MP arrived and they started to secure the area just as the substance was identified.

7. General Observations:

a. The area was never adequately secured.

b. There was no clear line of who was in charge. I figured it was one of the three Chiefs there, however, several technical advisors called in dealt with the fire captain.

c. Not sufficient control in the Unit - who was responsible for the spill, because

(1) They never got out of the area adequately.

(2) The person who spilled it couldn't be found.

d. The ambulance drivers took their orders from the hospital not the Fire Department. When they departed, there was a question as to whether they had transported anyone.

ELIZABETH BETZ



UNITED STATES MARINE CORPS RANGE CONTROL MARINE CORPS BASE N REPLY REFE**S**TO: OCT 1987 CAMP LEJEUNE, NORTH CAROLINA 28542-5001 RCTL Oct 87 From: To: Subj: Sep 87 Ref: Encl: ·ovided. 1. A: gency (EPA), regulations may 2. Pend sal of unserviceable adversel jeune. ammuniti There are four sites aboard Camp Lejeune where Grade III is 3. disposed of; K-326, G-4A, G-10A, and K-2A. Ranges K-326 and G-4A are used exclusively for training and emergency rendering safe/disposal operations. Ranges G-10A and K-2A are used for routine disposal operations. See enclosures (1) and (2).

4. During FY 87, 10,489 pounds Net Explosive Weight (NEW) of Grade III was destroyed at the request of the Ammunition Supply Point (ASP). On the average, one Grade III disposal operation is conducted each quarter. Enclosure (3) lists, by quarter, the items, quantity, and NEW.

5. For every operation, the ASP assigns personnel for training in Grade III disposal. Routine disposal of Grade III is not a required skill for EOD Technicians, by reference (b) or (c). Reference (b) calls for routine disposal to be conducted by ordnance personnel (Ammunition Technicians), when possible. Presently, the ASP has no one qualified to conduct such operations.

6. It is beyond my capability to accurately forecast the impact upon MCB and tenant commands if we are not allowed to dispose of Grade III, locally. The OIC of the ASP should be able to provide detailed input on this topic.



UNITED STATES MARINE CORPS RANGE CONTROL N REPLY REFE BIO OCT 1987 MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA 28542-5001 RCTL Oct 87 From: To: Subj: Sep 87 drance Ref: Encl: ovided. 1. As

2. Pending Environmental Protection Agency (EPA), regulations may adversely effect or preclude the disposal of unserviceable ammunition (Grade III) aboard Camp Lejeune.

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

N REPLY REFE**S**TO: OCT 1987 RCTL 7 Oct 87

From: Range Control Officer To: Assistant Chief of Staff, Training and Operations

Subj: MUNITIONS DISPOSAL

Ref: (a) SJA memo for AC/S Fac 5800 over SJA 41 dtd 15 Sep 87 (b) NAVSEA OP 5 Vol 1 (c) MCO P1200.7

Encl: (1) MAP of Ranges K-326 and K-2A
(2) MAP of G-4A and G-10A
(3) Lists of munitions destroyed in FY 87
(4) CG, MCB msg 142015 Aug 87

1. As recommended in reference (a), the following is provided.

2. Pending Environmental Protection Agency (EPA), regulations may adversely effect or preclude the disposal of unserviceable ammunition (Grade III) aboard Camp Lejeune.

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SUBJ: MUNITIONS DISPOSAL

8. Enclosure (4) was the latest effort of MCB to reduce the amount of Grade III generated.

9. I recommend that the OIC of the ASP be contacted and included in all future meetings on this subject.

D. N. BUCKNER

55 m. ...



8027 RCTL 7 Oct 87

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From: Range Control Officer To: Assistant Chief of Staff Training an

To: Assistant Chief of Staff, Training and Operations

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1. As recommended in reference (a), the following is provided.

2. Pending Environmental Protection Agency (EPA), regulations may adversely effect or preclude the disposal of unserviceable ammunition (Grade III) aboard Camp Lejeune.

3. There are four sites aboard Camp Lejeune where Grade III is disposed of; K-326, G-4A, G-10A, and K-2A. Ranges K-326 and G-4A are used exclusively for training and emergency rendering safe/disposal operations. Ranges G-10A and K-2A are used for routine disposal operations. See enclosures (1) and (2).

4. During FY 87, 10,489 pounds Net Explosive Weight (NEW) of Grade III was destroyed at the request of the Ammunition Supply Point (ASP). On the average, one Grade III disposal operation is conducted each quarter. Enclosure (3) lists, by quarter, the items, quantity, and NEW.

5. For every operation, the ASP assigns personnel for training in Grade III disposal. Routine disposal of Grade III is not a required skill for EOD Technicians, by reference (b) or (c). Reference (b) calls for routine disposal to be conducted by ordnance personnel (Ammunition Technicians), when possible. Presently, the ASP has no one qualified to conduct such operations.

6. It is beyond my capability to accurately forecast the impact upon MCB and tenant commands if we are not allowed to dispose of Grade III, locally. The OIC of the ASP should be able to provide detailed input on this topic.



8. Enclosure (4) was the latest effort of MCB to reduce the amount of Grade III generated.

9. I recommend that the OIC of the ASP be contacted and included in all future meetings on this subject.

D. N. BUCKNER

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lst QTR of FY 87

DODIC	NOMENCLATURE	QTY	NEW
A011	12 Gau. 00 Buck	113	0.42601
A059	5.56mm Ball	3	0.01119
A068	5.56mm Tracer	1489	. 6.34314
A071	5.56mm Ball	11637	47.7117
A075	5.56mm Blank, Linked	2096	2.096
A080	5.56mm Blank	4425	7.21275
A111	7.62mm Blank, Linked	4217	10.5425
A124	7.62mm Tracer	10	0.066
A130	7.62mm Ball	816	5.3611
A131	7.62mm Linked, 4&1	1712	11.984
A400	.38 Ball	32	1.02336
A475	.45 Ball	1370	1,0686
A576	.50 Link, 4API/1APT	302	10.87502
A599	.50 Blank	169	15.717
A681	.22mm Subcal	1704	1.704
A682	.22mm Subcal	1602	1,602
A683	.22mm Subcal	1635	1.635
B504	40mm Green Star Para	2	0 37564
B535	40mm White Star Para	6	1.2414
B546	40mm HEDP	ĩ	0068
B568	40mm HE	1	0697
B569	40mm HE, ICM	20	2 614
B627	60mm I1111m	1	6056
B632	60mm HE	2	1 14832
C256	81mm HE	7	16 996
C513	105mm APERS	30	93 000
C519	105mm APERS-T	194	1784 8
D505	155 Illum	1	34 4
D540	105mm Prop Chg. Grn Bag	7	39 823
D544	155mm HE	i	14 61
D548	155mm HC Smoke	24	627 12
D550	155mm WP Smoke	4	62.4
D680	8" HE	3	108 9
G840	.22 LR. Blank	40676	12 2028
G895	Grenade, Hand Illum	1	2203
G963	Grenade, Hand CS	1	- 2205
HX05	83mm Rocket, Assault	2	6 9948
H557	66mm Rocket, HEAT	2	1 604
Н708	.35 Rocket, Practice	2	0662
K143	Mine, APERS	1	1 57
L225	Sig Illum, Dbl Star Red	2	41572
L307	Sig Illum, Wht Star Clus	Ā	96024
L314	Sig Illum, Grn Star Clus	5	. 90024
L324	Sig Smoke, Red Para	2	26136
L367	Sim, Launching G. Missi	10 7	21975
L596	Sim. Flash Arty	49	0 1975
L598	Sim. Booby Tran Flach	19	106%
1.599	Sim. Booby Tran Tilum	19	.1004
NX25	Can Desensitizing Fuco	6146	•0113
N276	Fuze MTSO	3510	2 0061
	ruse, mroy	3310	7.0301



1st QTR of FY 87 (Cont.)

DODIC	NOMENCLATURE	QTY	NEW
N402	Fuze, Proximity	8	.15904
N411	Fuze, Proximity	10	.5587
N412	Fuze, Proximity	425	. 23.545
N463	Fuze, Proximity	1.	.05587
N464	Fuze, Proximity	1 .	.0129
IX95	Red Eye Eject Missile	7	
	Artillery Subcharges	153	46.8

2nd QTR of FY 87 No Disposal Operations Were Conducted During The 2nd Quarter.

3rd QTR of FY 87

DODIC	NOMENCLATURE	QTY	NEW
A011	12 Gauge 00 Buck	105	.39585
A014	12 Gauge 7 1/2	13	.03679
A059	5.56mm Ball	8579	319.9967
A063	5.56mm Tracer	485	18.0905
A064	5.56mm Linked	377	14.0621
A068	5.56mm Tracer	2698	11.49348
A071	5.56mm Ball	26219	107.4979
A075	5.56mm Blank, Linked	11316	11.316
A080	5.56mm Blank	35785	58.32955
A086	.22 Long Rifle	28	.00672
A111	7.62mm Blank	15166	37.915
A131	7.62mm Linked	1035	7.245
A135	7.62mm Dummy	35	.238
A136	7.62mm Ball Match	14	.0952
A171	7.62mm Ball Match	481	3.2708
A363	9mm Ball	352	3.0624
A400	.38 Ball	195	.14235
A475	.45 Ball	3324	2.59272
A483	.45 Ball Match	10	.0078
A560	.50 Dummy	5	.0344
A576	.50 Linked	1029	37.05429
A589	.50 Linked	698	72.81536
A599	.50 Blank	43	3.999
B509	40mm Yel Smk Grd Mrkr	1	.17215
B519	40mm Practice	18	5.19138
B535	40mm Wht Star Para	1	.2106
B536	40mm Wht Star Cluster	2	.4412
B542	40mm HEDP	8	.75216
B567	40mm Tactical CS	2980	359.686
B569	40mm HE/ICM	25	3.2675
B571	40mm HE Linked	8	1.04144
B576	40mm Prac, Linked	1	.010

Enclosure (3)



3rd QTR of FY 87 (Cont.)

DODIC	NOMENCLATURE	QTY	NEW
B632	60mm HE	1	. 57416
B643	60mm HE	1	.1156
C226	81mm Illum	8	14.27432
C256	81mm HE	11	. 26.708
C445	105mm HE	7	52.15
C449	105mm Illum	1 .	4.75
C520	105mm TPDS-T	2	20.02514
D540	155mm Green Bag	2	11.378
D544	155mm HE	240	3506.4
G839	7.62mm Rifle Grenade	964	5.6876
G878	Fuze, Gren, Prac	12	.0552=
G930	Gren, HD, Smk HC	. 3	3.6
G940	Gren, HD. Smk Grn	3	2.157
G945	Gren, HD. Smk Yel	4	2.88752
H708	35mm Rocket, Prac	54	1.7874
K143	Mine, Apers	1	1.57
K765	Riot Control Agent CS	1	.11013
K869	Smk Pot. Float or Ground	3	40.95
LX21	Sim. Noise Asslt Rkt Trnr	10	
L225	Sig. Illum, Dbl Str Clst	2	.41572
L306	Sig, Illum, Red Str Clst	2	. 32386
L307	Sig, Illum, Wht Str Clst	3	.72018
L311	Sig, Illum, Wht Str Para	2	. 53008
L312	Sig, Illum, Wht Str Para	1	.26504
L314	Sig, Grn Str Clstr	14	2.268
L324	Sig, Grn Smk	2	.26136
L367	Sim. Launching G. Missile	3	.09375
L495	Flare, Surface Trip	8	5.6
L592	Blast Simulator, Assy	392	2.59112
L596	Simulator, Flash, Arty	33	6.1875
L598	Sim. Booby Trap, Flash	17	.0952
L599	Sim. Booby Trap, Illum	7	.0791
L602	Sim./Flash, Arty	7	.65625
M130	Cap, Blasting, Electric	6	.01752
N248	Fuze, MT	1	.0015
N278	Fuze, MTSQ	- 2	.10178
N334	Fuze, PD	249	19.81791
N340	Fuze, PD	3	.14313
N402	Fuze, Proximity	1	.01988
N523	Primer, Percussion	5	.0157
	Arty SubCharges	232	69.6

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Enclosure (3)



4th QTR of FY 87

DODIC	NOMENCLATURE	QTY	NEW
A011	12 Gauge 00 Buck	10	.0377
A059	5.56mm Ball	4066	151.6618
A063	5.56mm Tracer	876	32.6748
A064	5.56mm Linked	1355	. 50.5415
A068	5.56mm Tracer	47	. 20022
A071	5.56mm Ball	2064 .	8.4624
A075	5.56mm Blank, Linked	1226	1.226
A080	5.56mm Blank	5057	8.24291
A111	7.62mm Blank	3437	8.5925
A131	7.62mm Linked, 4&1	76	. 532
A363	9mm Ball	214	1.8618-
A475	.45 Ball	1270	. 9906
A543	.50 API-T Linked	34767	1210.5869
A576	.50 API-APIT 2&1	70	2,5207
A 599	.50 Blank	257	23,901
B472	40mm Dummy	1029	
B508	40mm Grn Smk	1	. 17215
B519	40mm Practice	8	2.30728
B537	40mm Riot Control CS	20	4.226
B571	40mm HE Linkod	20	26036
B630	60mm WP Smoke	2	1 7312
B6/3	60mm HE II EURO PD	4	1 7
C074	Simm Practice	i i	2 31515
C226	81mm Illum	1	1 78429
C256	81mm HE	3	7.284
C276	81mm WP Smoke	12	28.02
C445	105mm HE M/o Euro	2	14 9
C449	105mm T11um	1	4.75
C477	105mm WP Smoke	10	73.2
D541	155mm Prop Chg Wht Bag	1	13.0
D550	155mm WP Smoke	5	78.0
D550 D676	8" Prop Chg Wht Bag	ĩ	28 815
D681	Flach Charge Reducer	1	1.0
C815	Gran Loobr Smk PP corn	3	2.97
C 9 3 0	7 62mm Pifle Cron	1489	8 751
6039	Fuze UD Cree Bree	1405	00446
6070	Conce HD Bist CS	1	2667
6924	Gren, HD Klot CS	96	00 24
G957 C0/5	Gren, HD, Smk Wr	30	1 44376
G94J C050	Gren, HD, Smk lel	2	1 / 38
G950	Gren, HD, Smk Ked	5	4 01
H 3 3 7	25 Class Brass	20	4.01
H/U8	JJmm Subcal Frac	20	. 9200
K143	Mine Apers	1	1.37
K270	Sim. Mine Apers Prac	5	
K/65	Riot Control Agent CS	1	.11013
1.306	Sig Illum Ded Sta Clat	2	11.3
1.311	Sig Illum Pod Can Dend	2	.10193
1.312	Sig Illum Whe Sta Dana	17	. 50569
1314	Sig Tilum Can Sta Clat	2	4.JUJU0
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CD CG II HAF//URPU// CG SECOND MAH//DPDD// CG SECOND FSSG//PRPU// CHO FOUR MAU//PRPO// MCAS NEW RIVER NC//UPDC//	CG SECOND CG SIXTH M THO THO MA THO SIX MA NCB CAMP L	N RUIV///	//	
JACLAS //H08000//		3312		
SUNJ MANNUNITION MANAGENENT/ACCOU	HTING			
A. NCG 9020.1F 8. ALMAR 263/86				
L. REVIEW HE EUR PESPENSE RECORDS III AMHUNITION TURNED-IN INDICATES AMANDONED OR RETROGRADED TO AN UNSI 35 TO MAY 37 OVEP 11,000 ITEMS OF U TRAIMING PANCES. MANY OF THESE ITU IN THE BLACK MARKET.	AND THE BASE A AH UNACCEPIABL ERVICEABLE CONU DROMANCE HAVE H EMS ARE DF A HI	SPLIG "F E RATE "F ITI <u>NI.</u> F EEU KECTV GH <u>4ESALE</u>	GRADE	IM:
2. THE QUANTITY OF AMPUNITION BEN IS EXCESSIVE AND THE POTENTIAL EXIS DR SOLD/USED FOR UNAUTHORIZED PURPH	NG ARAHDONED GR STS FOR AHMUNIT DSFS.	RETRUCTA	STOLEN	
CONTENTS OF THE PEFS IN LODER TO MI NO ENSURE ACCOUNTABILITY. IN PART LOSER ATTENTION: A. ALL ECHELONS DISCEMINATE AND EN	RIZE THEMSELVES INTMIZE AMMUNIT TICULAR THE FOL NFORCE PROPER A	WITH THE ION MISMA LUWING AR AMONITION	MAGEMENT FAS NEFD I HANDLIN	IG
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DEVR:CG SIXTH MAR(7)ACT DEVR:TWU TWU MAU(4)ACT DEVR:TWU SIX MAU(5)ACT	•	i.		
DEVR:CG SIXTH MAR(7)ACT DEVR:TWD TWD MAU(4)ACT DEVR:TWD SIX MAU(5)ACT BLNG(2)DRIG FOR CO MCE CAMP LEJE DSSC(1) BCDS(1) BSDO(1) CENA(1)	+ EUNE(118) DICP(1) DCDR(1	4) SSTF(8	5) GSTF(/13/ 12)
DLVR:CG SIXTH MAR(7)ACT DLVR:TWD TWD MAU(4)ACT DLVR:TWD SIX MAU(5)ACT BLNG(2)DRIG FOR CC MCE CAMP LFJE DSSC(1) BCDS(1) BCDC(1) CFNA(1) G-4(1)ACT FOR CG TI MAF(3) CFU(1) S-S(1)	+ EUNE(118) DICP(1) DCDR(1	4) SSTF(8	5) GSTF(08000/ 1	/13/ 12) /0116
DLVR:CG SIXTH MAR(7)ACT DLVR:TWU TWU MAU(4)ACT DLVR:TWU SIX MAU(5)ACT BLOG(2)DRIG FOR CO MCE CAMP LFJF DSSC(1) BCUS(1) BCDO(1) CFOA(1) G-4(1)ACT FOR CG TI MAF(3) CFU(1) S-S(1)	ELNE(118) DICP(1) DCDR(1	4) SSTF(8 TD:000-00	5) GSTF(n8000/ 1 00/COPIES	/13/ 12) /0116 :0137
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ROUTINE

R 0521547 MAR 87 ZYB

FM CG MCB CAMP LEJEUNE NC

TO CMC WASHINGTON DC

INFO CG SECOND MARDIV CG II MAF CG SIXTH MAB NAVDENCLINIC CAMP LEJEUNE NC MCAS NEW RIVER NC MCB CAMP LEJEUNE NC

UNCLAS //ND6280// SECTION 01 DF 02 //ND6280//

CMC//CODEXLFL//LANTDIV FOR 2032 SUBJ: HAZARDOUS WASTE MANAGEMENT PROGRAM, REPORT OF NOTICE OF VIOLATION

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MCD P11000.8B Α. TELEPHONE DISCUSSION OF 4 MARCH 1987 BTWN COL DALZELL, AC/S Β.

FACILITES, MCB, CAMP LEJEUNE AND MS. LAURA HUBER, HOMC (CODE LEL)

1. IN ACCORDANCE WITH REFERENCE A, THE FOLLOWING INFORMATION IS SUBMITTED ON THE SUBJECT MATTER.

A COMPLIANCE URDER, DOCKET NO. 00256, WAS ISSUED TO MARINE A . CORPS BASE, CAMP LEJEUNE, NC ON 2 MARCH 1987, RECEIPTED BY THIS COMMAND ON 3 MARCH 1987, FOR CERTAIN VIOLATIONS OF THE NORTH CAROLINA SOLID WASTE MANAGEMENT ACT AND RULES, N.C.G.S. 130A, ARTICLE 9 (ACT), AND THE NORTH CAROLINA HAZARDOUS WASTE MANAGEMENT RULES, 10 NCAC 10F (RULES).

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

BFAC(2)... ORIG FOR CG MCB CAMP LEJEUNE(9) BCED(1) DICB(1) BCUS(1) CEDA(1) BSDD(1) M(EA(D) BSJA(1)

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RTD:000-000/COPIES:0034

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791037/065 CSN:RXIA00005 1 OF 3 MATA0031 065/00:322 0521542 MAR 87 CG MCB CAMP LE

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B. THE COMPLIANCE ORDER WAS ISSUED AFTER FAILURE TO REACH AN AGREEMENT BETWEEN THE NORTH CAROLINA SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH, DEPARTMENT OF HUMAN RESOURCES AND MCB, CAMP LEJEUNE, ON VIDLATIONS NOTED DURING A EPA INSPECTION, AND TO EXPEDITE CAMP LEJEUNE'S COMPLIANCE WITH THE ACT AND RULES.

C. DN 26-27 JUNE 1986 A JDINT EPA/STATE OF NORTH CARDLINA INSPECTION WAS MADE OF CAMP LEJEUNE, MARINE CORPS BASE, AS OWNER/-OPERATOR OF EXISTING GENERATOR SITES, STORAGE AND/OR DISPOSAL FACILITIES, PERMIT NUMBER NC6170022580, WAS FOUND TO BE IN VIOLATION OF CERTAIN REQUIREMENTS CONTAINED IN 40CFR 262, 264, AND 265 CODIFIED AT 10 NCAC 10F .0030, .0032, .0033 AND .0034 RESPECTIVELY. SPECIFIC VIOLATIONS ARF:

(1) 40CFR 262.20(A). FAILURE TO INCLUDE GENERATOR I.D. NUMBER ON MANIFEST.

(2) 40CFR 262.34(A)(1). FAILURE TO PERFORM WEEKLY INSPECTIONS OF HW STORAGE AREAS.

(3) 40CFR 262.34(A)(2). FAILURE TO MARK ON EACH CONTAINER OF HW, THE DATE UPON WHICH EACH PERIOD OF ACCUMULATION BEGINS.

(4) 40CFR 262.34(A)(3). FAILURE TO LABEL OR MARK EACH CONTAINER WITH THE WORDS "HAZARDOUS WASTE".

(5) 40CFR 262.34(A)(4). FAILURE TO COMPLY WITH REQUIREMENTS IN SUBPARTS C AND D IN 40CFR PART 265 AND SECTION 265.16 WHILE ACCUMULATING HW ON SITE FOR 90 DAYS OR LESS.

(A) FAILURE TO MINIMIZE THE POSSIBILITY OF A FIRE, EXPLOSION OR SUDDEN OR NON-SUDDEN RELEASE OF HW.

(B) FAILURE TO DEVELOP CONTINGENCY PLANS FOR EACH GENERATING SITE.

(C) FAILURE TO MAINTAIN AT EACH HW GENERATING SITE;

1. JUB TITLE FOR EACH HW POSITION.

2. NAME OF EACH EMPLOYEE FILLING EACH JOB.

3. WRITTEN JOB DESCRIPTION FOR EACH POSITION IN HW

MANAGEMENT.

4. RECORD OF TYPE AND AMOUNT OF TRAINING REQUIRED AND GIVEN TO EACH PERSON FILLING A HW JOR.

(6) 40CFR 262.42(A). FAILURE TO RECEIVE A SIGNED COPY UF THE MANIFEST WITHIN 45 DAYS OF THE DATE THE HW WAS ACCEPTED BY THE INITIAL TRANSPORTER AND FAILURE TO SUBMIT AN EXCEPTION REPORT ON SHIPMENTS WHERE THE SIGNED COPY OF THE MANIFEST WAS NOT RECEIVED.

(7) 40CFR 264.16(D). FAILURE TO MAINTAIN JOB TITLE FOR EACH POSITION AT A HW FACILITY AND A WRITTEN JOB DESCRIPTION FOR EACH POSITION TO INCLUDE REQUISITE SKILLS, EDUCATION AND DUTIES.

(8) 40CFR 264.173(B). FAILURE TO HANDLE AND STORE CONTAINERS HOLDING HW IN A MANNER WHICH WOULD PREVENT RUPTURE OF THE CONTAINER AND CAUSE IT TO LEAK.

2. WITHIN 10 DAYS OF RECEIPT OF THE COMPLIANCE ORDER, (13 MARCH 1987), MARINE CORPS BASE, CAMP LEJEUNE MUST TAKE ACTION TO CORRECT ALL VIOLATIONS AS STATED IN THE COMPLIANCE ORDER. EACH DAY OF CON-TINUED VIOLATION OF ANY REQUIREMENT OF THE ACT OR RULES, CONSTITUTES A SEPARATE VIOLATION FOR WHICH A PENALTY OF UP TO \$10,000 PER DAY

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ROUTINE

R 0521547 MAR 87 ZYB

FM CG MCB CAMP LEJEUNE NC

TO CMC WASHINGTON DC

INFO CG SECOND MARDIV CG II MAF CG SIXTH MAB NAVDENCLINIC CAMP LEJEUNE NC MCAS NEW RIVER NC MCB CAMP LEJEUNE NC

CG SECOND FSSG HO NUC II MAF NAVHOSP CAMP LEJEUNE NC LANTNAVFACENGCOM NORFOLK VA DRMO CAMP LEJEUNE NC

UNCLAS //ND6280// SECTION 01 OF 02 //ND6280//

CMC//CDDEXLFL//LANTDIV FOR 2032 SUBJ: HAZARDOUS WASTE MANAGEMENT PROGRAM, REPORT OF NOTICE OF VIOLATION

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Α. MCD P11000.8B TELEPHONE DISCUSSION OF 4 MARCH 1987 BTWN COL DALZELL, AC/S Β.

FACILITES, MCB, CAMP LEJEUNE AND MS. LAURA HUBER, HOMC (CODE LFL)

IN ACCORDANCE WITH REFERENCE A, THE FOLLOWING INFORMATION IS 1. SUBMITTED ON THE SUBJECT MATTER.

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BFAC(2)...ORIG FOR CG MCB CAMP LEJEUNE(9) BCED(1) DICB(1) BCUS(1) CEDA(1) BSDD(1) MEA(D) BSJA(1) /13/

RTD:000-000/COPIES:0034

791037/065 CSN:RXIA00005 1 OF 3 MATA0031 065/00:327 0521542 MAR 87 CG MCB CAMP LE

U UNCLASSIFIED

B. THE COMPLIANCE ORDER WAS ISSUED AFTER FAILURE TO REACH AN AGREEMENT BETWEEN THE NORTH CAROLINA SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH, DEPARTMENT OF HUMAN RESOURCES AND MCB, CAMP LEJEUNE, ON VIDLATIONS NOTED DURING A EPA INSPECTION, AND TO EXPEDITE CAMP LEJEUNE'S COMPLIANCE WITH THE ACT AND RULES.

C. ON 26-27 JUNE 1986 A JOINT EPA/STATE OF NORTH CAROLINA INSPECTION WAS MADE OF CAMP LEJEUNE, MARINE CORPS BASE, AS OWNER/-OPERATOR OF EXISTING GENERATOR SITES, STORAGE AND/OR DISPOSAL FACILITIES, PERMIT NUMBER NC6170022580, WAS FOUND TO BE IN VIOLATION OF CERTAIN REQUIREMENTS CONTAINED IN 40CFR 262, 264, AND 265 CODIFIED AT 10 NCAC 10F .0030, .0032, .0033 AND .0034 RESPECTIVELY. SPECIFIC VIOLATIONS ARF:

(1) 40CFR 262.20(A). FAILURE TO INCLUDE GENERATOR I.D. NUMBER ON MANIFEST.

(2) 40CFR 262.34(A)(1). FAILURE TO PERFORM WEEKLY INSPECTIONS OF HW STORAGE AREAS.

(3) 40CFR 262.34(A)(2). FAILURE TO MARK ON EACH CONTAINER OF HW, THE DATE UPON WHICH EACH PERIOD OF ACCUMULATION BEGINS.

(4) 40CFR 262.34(A)(3). FAILURE TO LABEL OR MARK EACH CONTAINER WITH THE WORDS "HAZARDOUS WASTE".

(5) 40CFR 262.34(A)(4). FAILURE TO COMPLY WITH REQUIREMENTS IN SUBPARTS C AND D IN 40CFR PART 265 AND SECTION 265.16 WHILE ACCUMULATING HW DN SITE FOR 90 DAYS DR LESS.

(A) FAILURE TO MINIMIZE THE POSSIBILITY OF A FIRE, EXPLOSION OR SUDDEN OR NON-SUDDEN RELEASE OF HW.

(B) FAILURE TO DEVELOP CONTINGENCY PLANS FOR EACH GENERATING SITE.

(C) FAILURE TO MAINTAIN AT EACH HW GENERATING SITE;

1. JUB TITLE FOR EACH HW POSITION.

2. NAME OF EACH EMPLOYEE FILLING EACH JOB.

3. WRITTEN JOB DESCRIPTION FOR EACH POSITION IN HW

MANAGEMENT.

4. RECORD OF TYPE AND AMOUNT OF TRAINING REQUIRED AND GIVEN TO EACH PERSON FILLING A HW JOR.

(6) 40CFR 262.42(A). FAILURE TO RECEIVE A SIGNED COPY OF THE MANIFEST WITHIN 45 DAYS OF THE DATE THE HW WAS ACCEPTED BY THE INITIAL TRANSPORTER AND FAILURE TO SUBMIT AN EXCEPTION REPORT ON SHIPMENTS WHERE THE SIGNED COPY OF THE MANIFEST WAS NOT RECEIVED.

(7) 40CFR 264.16(D). FAILURE TO MAINTAIN JOB TITLE FOR EACH POSITION AT A HW FACILITY AND A WRITTEN JOB DESCRIPTION FOR EACH POSITION TO INCLUDE REQUISITE SKILLS, EDUCATION AND DUTIES.

(8) 40CFR 264.173(B). FAILURE TO HANDLE AND STORE CONTAINERS HOLDING HW IN A MANNER WHICH WOULD PREVENT RUPTURE OF THE CONTAINER AND CAUSE IT TO LEAK.

2. WITHIN 10 DAYS OF RECEIPT OF THE COMPLIANCE ORDER, (13 MARCH 1987), MARINE CORPS BASE, CAMP LEJEUNE MUST TAKE ACTION TO CORRECT ALL VIOLATIONS AS STATED IN THE COMPLIANCE ORDER. EACH DAY OF CON-TINUED VIOLATION OF ANY REQUIREMENT OF THE ACT OR RULES, CONSTITUTES A SEPARATE VIOLATION FOR WHICH A PENALTY OF UP TO \$10,000 PER DAY

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MAY BE IMPOSED. IF THE VIOLATION(S) CONTINUES, CAMP LEJEUNE MAY ALSO BE SUBJECT TO FURTHER ENFORCEMENT INCLUDING INJUNCTION FROM ANY FURTHER TREATMENT, STOPAGE, OR DISPOSAL OF HW AND SUCH FURTHER RELIEF AS MAY BE NECESSARY TO ACHIEVE COMPLIANCE.

IMMEDIATELY AFTER THE INSPECTION OF 26-27 JUNE 1986, MARINE CORPS 3. BASE; CAMP LEJEUNE INITIATED A COMPREHENSIVE PROGRAM TO BRING THE HW MANAGEMENT PROGRAM INTO COMPLIANCE WITH THE ACT AND RULES. AS NOTED IN PARAGRAPH 1B ABOVE, NUMEROUS MEETINGS WERE CONDUCTED WITH NORTH CAROLINA HAZARDOUS WASTE OFFICIALS IN AN EFFORT TO NEGOTIATE AN AGREEMENT. WORKING MEETINGS WERE ALSO CONDUCTED WITH MARINE CORPS. BASE AND TENANT UNITS OUTLINING HW MANAGEMENT DEJECTIVES; DEVELOPMENT OF A PLAN OF ACTION TO CORRECT NOTED DISCREPANCIES; AND SETTING UP A SERIES OF COURTESY AND COMPLIANCE INSPECTIONS OF ALL WORK SITES/SHOPS WHERE HW ARE ROUTINELY GENERATED AND STORED. MESSAGES WERE SENT TO ALL COMMANDS AND ACTIVITIES STRESSING THE SERIOUS NATURE OF CONTINUED VIOLATIONS AND REQUESTING STRICT ADHERENCE TO ESTABLISHED PROCEDURES TO AVOID IMPOSITION OF CIVIL AND/OR CRIMINAL PENALTIES. FOUR ADDI-TIONAL CIVILIAN BILLETS WERE ESTABLISHED WITHIN THE NATURAL RESOURCES ENVIRONMENTAL AFFAIRS DIVISION (NREAD), FACILITIES DEPARTMENT, MARINE CORPS BASE, TO ASSIST IN THE MANAGEMENT AND INSPECTION OF THE HW DISPOSAL PROGRAM. A REVISED BASE ORDER HAS BEEN STAFFED AND WILL BE PUBLISHED IN THE NEAR FUTURE. THIS ORDER OUTLINES IN DETAIL THE RESPONSIBILITIES, PROCEDURES AND CONTAINS SPECIFIC GUIDANCE FOR THE HW DISPOSAL PROGRAM AT CAMP LEJEUNE, AND IS IN LINE WITH EXISTING ORDERS AND RECOMMENDATIONS FROM NORTH CAROLINA/EPA STAFFS.

4. MARINE CORPS BASE REPRESENTATIVES WILL SCHEDULE AN INFORMAL CONFERENCE WITH REPRESENTATIVES OF THE NORTH CAROLINA DEPARTMENT OF HUMAN RESOURCES DURING THE WEEK OF 9 MARCH 1987 TO DISCUSS THE COMPLIANCE ORDER.

5. MARINE CORPS BASE, CAMP LEJEUNE IS TAKING ALL REQUIRED STEPS TO ENSURE COMPLIANCE WITH THE ACT AND RULES. MANY OF THE DISCREPANCIES HAVE ALREADY BEEN CORRECTED BUT WORK MUST CONTINUE TO ENSURE COMPLETE COMPLIANCE IF POSSIBLE. THE COMMAND RELATIONSHIPS BETWEEN HOST AND TENANT UNITS REQUIRE RELIANCE ON GENERATOR SITE MANAGERS TO ENSURE COMPLIANCE IN ACCORDANCE WITH THE BASE ORDER. THIS COMMAND RELA-TIONSHIP COUPLED WITH PERSONNEL TURBULENCE ASSOCIATED WITH MILITARY ACTIVITIES, AND CONSIDERING THE REQUIREMENTS OF EACH UNIT/ACTIVITY TO ACCOMPLISH THEIR PRIMARY MISSION, MAKES FOR A HW MANAGEMENT PROGRAM FRAUGHT WITH OPPORTUNITIES TO FAIL IF EACH GENERATOR SITE, EMPLOYEE, SUPERVISOR AND COMMANDER DOES NOT GIVE THIS PROGRAM MAXIMUM SUPPORT.

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DATE: ACT 0 6 1987

CARTMENT OF THE NAVY Memorandum 6280/2 FAC

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

TO: Assistant Chief of Staff, Logistics Director, Natural Resources and Environmental Affairs Division

SUBJ: TRANSPORTATION OF HAZARDOUS WASTE

1. There will be a meeting 14 October at 1500 in the Assistant Chief of Staff, Facilities conference room to discuss transportation of hazardous waste. Request representation from your office.

2. POC is B. W. Elston, extension 3034.

ELSTON W. Acting





6280/2 FAC

Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune Base Maintenance Officer (Attn: Fiscal and Accounting) Via: Comptroller

REQUEST FOR ANALYSIS OF HAZARDOUS MATERIAL

Encl: (1) NAVCOMPT Form 2275 dtd 11 Dec 86

1. Forwarded for fiscal processing. Please note request for monthly updates per paragraph 14.2 of the enclosure.

B. W. ELSTON By direction

Copy to:



CONDITIONS/INSTRUCTIONS GOVERNING USE OF THIS FORM AND SUPPLEMENTARY ITEMS TO BE CONSIDERED AN INTEGRAL PART OF THIS ORDER

CONDITIONS/INSTRUCTIONS GOVERNING USE OF THIS FORM:

This form will only be used for requesting work and/or services. This form will not be used for requesting local purchases, contractual procurement, or material from stock. The purchase/procurement, or requisitioning from stock, of material incident to the performance of this order, however, is permissible.

Note: Requests for the purchase or contractual procurement of material or services will be accomplished through the use of Request for Contractual Procurement, NAVCOMPT FORM 2276 (8-81).

Requests for standard and/or non-standard stock available within the U.S. Government will be accomplished, through the use of DOD Single Line Item Requisition System Documents (DD Form 1348 and/or 1348-6, as appropriate).

SUPPLEMENTARY ITEMS:

1. Written acceptance of this order is required and will be accomplished by completing Block 16 on one copy of this order and returning it to the requesting activity cited in Block 8. Acceptance must be on a reimbursable basis only.

2. Amounts authorized by this document have been reserved by the requesting activity and will be obligated upon receipt of the acceptance copy of this document.

3. Amounts authorized by this document may not be exceeded. Additional funds, if required, will be requested from the activity cited in Block 8. Approval of such requests will be accomplished by the requesting activity through the issuance of an amendment to this document, appropriately reflecting the amount of additional funds being provided.

4. The funds authorized by the document are available for obligation by the performing activity cited in Block 10 until the date indicated in Block 4, or Block 5, as appropriate. Funds not actually obligated by the performing activity by that date will be returned to the requesting activity via Status of Reimbursable Orders of similar acceptable form.

5. Extension of the work completion date cited in Block 5 of this order, if required, must be requested in writing and is subject to the approval of the requesting activity cited in Block 8. Approval of such requests will be accomplished by the requesting activity through the issuance of an amendment to this document, citing the work completion date.

6. This order is issued as a Project Order, as indicated in Block 13, and is placed in accordance with 41 U.S. Code 23 and DOD Directive 7220.1 (Regulations Governing the Use of Project Orders). Performance of the work and/or services requested must be accomplished in accordance with these same statutes and regulations.

7. Billings will normally be submitted by the performing activity on a monthly basis unless specifically stated in Block 14.

8. This order is placed pursuant to the Economy Act (31 U.S.C. 686) and will be performed in accordance therewith.

9. Amounts authorized by this document ARE subject to Section 3679, R.S.

10. Amounts authorized by this document ARE NOT subject to Section 3679, R.S.



HIS C	THONS LISTE	BE ACCEP	REVERSE	REIMBURSA	BLE	BASIS ONLY	AND IS	SUBJECT TO	2.	M2710087WR00016
7100	FERENCE NUMBER 7100-6275-WR16		4. FUNDS EXPIRE ON 30 SEPT 87			5. WORK COMPLETION DATE 30 SEPT 87		TION DATE	6. DATE PREPARED 11 DEC 86	7. AMENDMENT NO
ROM:	COMMAND 2D FSSG (AC/S C	ING GEN FMFLAN OMPTROI	NERAL NT, CLNC 28542-5701 LLER)					84–2925/3564		
10:	COMMANDING GENERAL MARINE CORPS BASE CAMP LEJEUNE, NC 28542-5001 CAMP LEJEUNE, NC 28542-5001 CAMP LEJEUNE					»: ANT (FWD) NC 28542				
UIC		E CORPS	S BASE 2, NC 2	8542–5003	1		n a tanàn a		OIC CFAO FMFL CAMP LEJEUNE	ANT (FWD) NC 28542
UIC		E CORPS	БАЗЕ 2, NC 2	8542-500	G DAT	TA TO BE CIT	ED ON		OIC CFAO FMFL CAMP LEJEUNE BILLINGS	ANT (FWD) NC 28542
UIC		E CORPS LEJEUNH C. SUB- HEAD	D. OBJ. CLASS	ACCOUNTING	G DAT	TA TO BE CIT	ED ON H. TT	RESULTING	OIC CFAO FMFL CAMP LEJEUNE BILLINGS J. COST CODE	ANT (FWD) NC 28542 K. Amount
UIC	MARIN CAMP	C. SUB- HEAD	D. OBJ. CLASS	8542-500	G DAT	<mark>G.</mark> ААА 055300	ED ON H. TT 2D	RESULTING	OIC CFAO FMFL CAMP LEJEUNE BILLINGS J. COST CODE CC700010071HMQ	ANT (FWD) NC 28542 K. <u>Amount</u> \$13,200.00
UIC N B./	MARIN CAMP	C. SUB- HEAD	D. OBJ. CLASS	ACCOUNTING E. BU. CONTROL 68447	G DAT	а то ве сіт ^{G.} ада 055300	ED ON HTT 2D	RESULTING	OIC CFAO FMFL CAMP LEJEUNE BILLINGS J. COST CODE CC700010071HMQ	ANT (FWD) NC 28542 K. <u>AMOUNT</u> \$13,200.00 \$13,200.00

COST REIMBURSEMENT BASIS. WHEN THE FIRST BLOCK IS CHECKED, THIS ORDER IS PLACED IN ACCORDANCE WITH THE PRO VISIONS OF 41 U.S. CODE 23 AND DOD DIRECTIVE 7220.1. THE FOLLOWING SUPPLEMENTARY ITEMS ON REVERSE ALSO APPLY AND ARE AN INTEGRAL PART OF THIS ORDER: 1, 2, 3, 4, 7, 8, 10

DESCRIPTION OF WORK TO BE PERFORMED AND OTHER INSTRUCTIONS

1. FUNDING IN THE AMOUNT OF \$13,200.00 IS PROVIDED TO MARINE CORPS BASE TO SUPPORT THE COST OF THE TESTING OF HAZARDOUS MATERIAL.

2. A REPORT ON REIMBURSABLE ORDERS, NAVCOMPT FORM 2193 IS REQUESTED ON A MONTHLY BASIS TO THE COMMAND IN BLOCK 8.

	AUTHONNE OFFICIAL (NAME TITLE AND SIGNATURE)	I DATE
ARE PROPERLY CHARGEABLE FOR THE WORK OR SERVICES REQUESTED.	B. F. REED, MAJOR, DEPUTY COMPTROLLER	11 DEC 86
THIS ORDER IS ACCEPTED AND THE WORK OR SERVICES WILL BE PRO-	ACCEPTING OFFICIAL (NAME, TITLE AND SIGNATURE)	DATE
VIDED IN ACCORDANCE HEREWITH.		

