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Confidential Records Management, Inc. New Bern, NC 1-888-622-4425 9/08 FROM: DPDO CAMP LEJEUNE NC

TO: CG MCB CAMP LEJEUNE NC

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MCAS H NEW RIVER NC

NAVREGMEDCEN CAMP LEJEUNE NC

NAVREGDENCEN CAMP LEJEUNE NC

EMCB CAMP LEJEUNE

UNCLASS //ND44DD//

SUBJ: HAZARDOUS MATERIAL/WASTE WAREHOUSES, TP-451 AND TC-863

- 1. THIS OFFICE HAS ASSUMED RESPONSIBILITY FOR SUBJECT WAREHOUSES.
- REQUIREMENTS STILL EXIST FOR LOCATION AND COMPATIBLE ITEMS LAYOUT,
- WHICH MUST BE COMPLETED BEFORE ITEMS CAN BE ACCEPTED FOR STORAGE.
- 2. WHEN THIS WORK IS COMPLETED AND UPON NOTIFICATION THIS OFFICE
- WILL BEGIN RECEIVING AND STORING HAZARDOUS MATERIAL/WASTE.
- 3. ADDRESSES ARE REQUESTED TO READDRESS THIS MESSAGE TO SUBORDINATE.

COMMANDS TO INSURE WIDEST DISSEMINATION.

|STF|GSTF|DPDO|OCDR

DRAFTER TYPED NAME, TITLE, OFFICE SYMBOL, PHONE

MRS. DONNA HARRINGTON - SECRETARY GS-4, DPDO, 5613, 9 DEC 82

ACTIBLOG NRMCINRDC

SPECIAL INSTRUCTIONS

TYPED NAME, TITLE OFFICE SYMBOL AND PHONE M. J. KING, CHIEF, DPDO, 2303

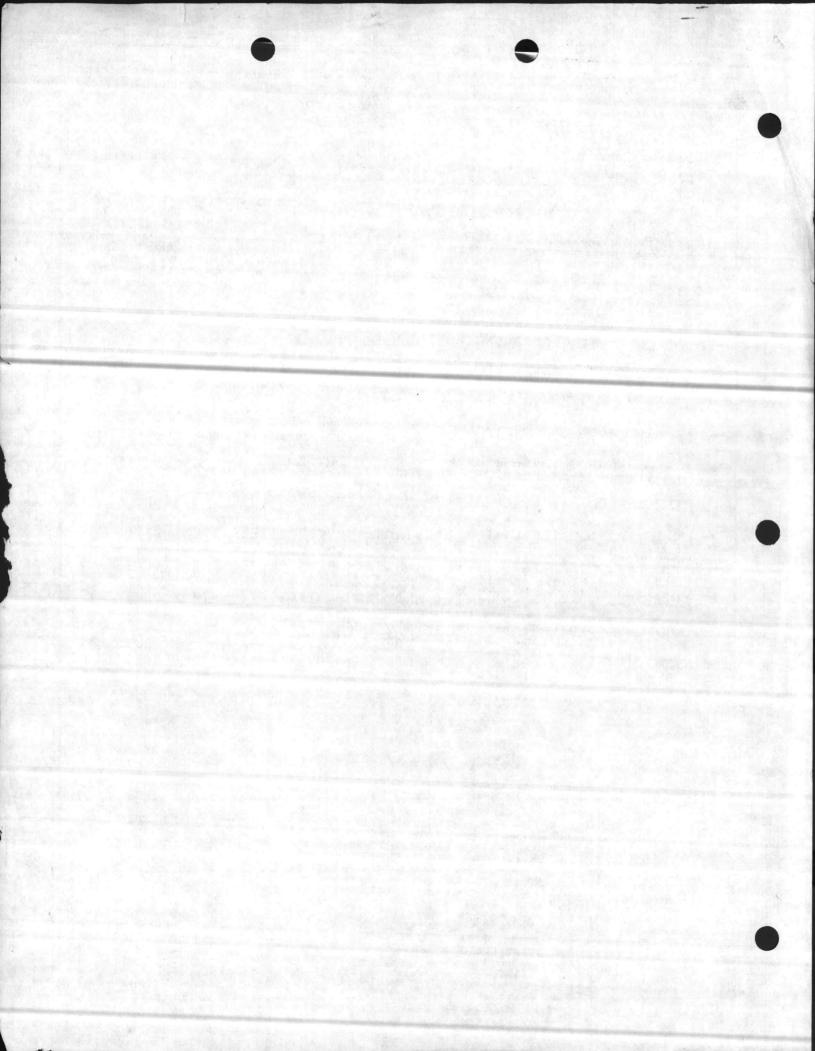
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PREVIOUS EDITION IS OBSOLETE

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File- 6240

ASSISTANT CHIEF OF STAFF, FACILITIES HEADQUARTERS, MARINE CORPS BASE

18 Nov 82

TO:

BASE MAINT O

DIR, FAMILY HOUSING

PUBLIC WORKS O

DIR. UNACCOMPANIED PERS HSG

COMM-ELECT O

BASE FIRE CHIEF

ATTN: N. R. E. A. - Julian/Danny

1. Attached is forwarded for info/action.

I will explain PT B procedures

to COLM/LTEF - Danny & I

will discuss on Monday:

2 Your file copy

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

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DIVISION OF HEALTH SERVICES EASTERN REGIONAL OFFICE 404 St. Andrews Street Greenville, N.C. 27834 (919) 756-1343

November 15, 1982

Commanding General
U.S. Marine Corp Base
Camp Lejeune, NC 28542

Attention: Assistant Chief of Staff, Facilities

Dear Sir:

On Thursday November 4, 1982 an inspection by the N.C. Solid and Hazardous Waste Management Branch was performed at the hazardous waste storage buildings TC 863 and TP 451 located on base.

Our inspection revealed that the regulatory requirements addressed in my letter of October 19, 1982 have been met. This letter is to inform you that these facilities meet the requirements for hazardous waste storage facilities and can now begin receiving hazardous waste.

If you have any questions or if I may be of any further assistance please do not hesitate to call.

Very truly yours,

Raymond L. Church

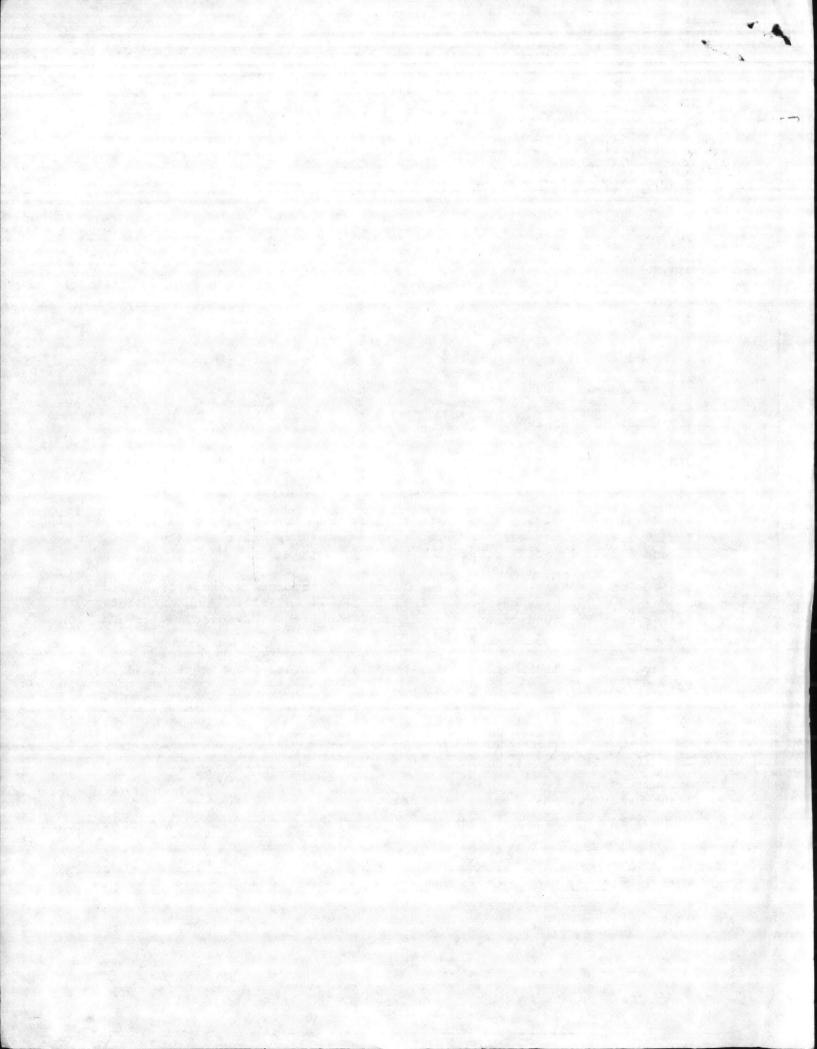
Solid and Hazardous Waste Management Branch

Environmental Health Section

sle

cc: Asst. Chief of Staff, Logistics Traffic Management Office

O.W. Strickland Jerry Rhodes





y to: NREA

Ronald H. Levine, M.D., M.P.H. STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES EASTERN REGIONAL OFFICE 404 St. Andrews Street Greenville, N.C. 27834 (919) 756-1343

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Solid and Hazardous Waste Management Branch

Environmental Health Section

sle

cc: Asst. Chief of Staff, Logistics Traffic Management Office O.W. Strickland Jerry Rhodes

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PAGE 01

RT TU ZYUW RUEACMC5239 2922044-UUUU--RUEBDOA.

ZNR UUUUU

R 181428Z OCT 82

FM CMC WASHINGTON DC

TO A IG E IGHT ACT: CG MCB

BT

UN CLAS //N11000//

SUBJ: DISPOSAL OF SPILL RESIDUES (CMC CODE LFF-2)

HODP DS BATTLE CREEK MI 011912Z OCT 82 (PASEP)

MC 0 4570.24A OF 20 JAN 82 B .

MC 0 P11000 .8A C.

1. REF A FORWARDED FOR ACTION AS APPROPRIATE. ITS CONTENTS WILL BE

INCORPORATED INTO FORTHCOMING UPDATES OF REFS B AND C.

BT

#5 23 9

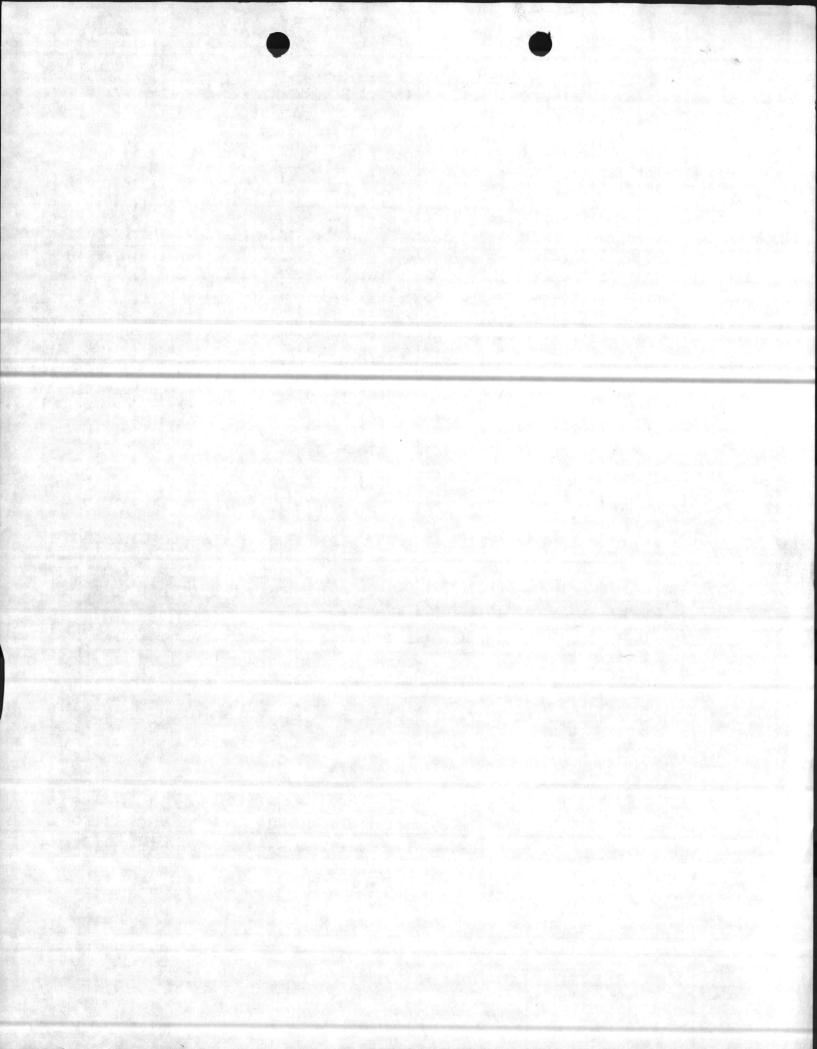
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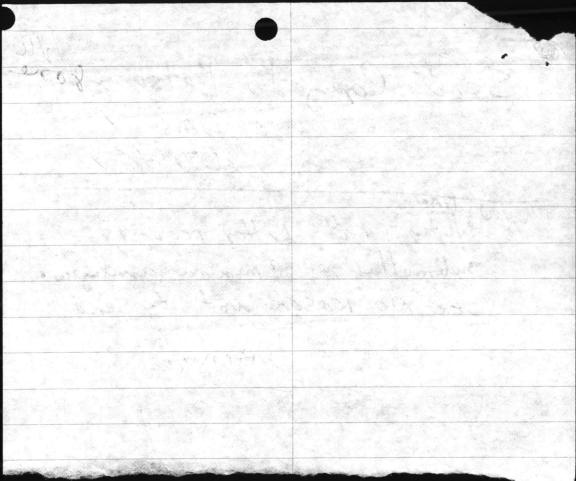
ROUTINE

28 = Oct 82

NCLASSIFIED



Send Copy to Betsil & love Bmo 1 UTILITIESI Note That Letter regrests Submittal of Chemical analysis. see NO 1005on not to send DAnny





Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

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

October 25, 1982

Commanding General
USMC Camp Lejeune
Camp Lejeune, North Carolina 28542

ATTN: R. F. Calta, Lieutenant Colonel
USMC Base Maintenance Officer

Sir:

To conform the potable water treatment facilities of USMC Camp Lejeune to the provisions of the North Carolina Safe Drinking Water Act, the following public water supply I.D. numbers have been assigned.

04-67-041	USMC	Hadnot Point
04-67-042	USMC	New River Air Station
04-67-043	USMC	Holcomb Boulevard
04-67-044	USMC	Tarawa Terrace
04-67-045	USMC	Camp Johnson
04-67-046	USMC	Rifle Range
04-67-047	USMC	Courthouse Bay
04-67-048	USMC	Onslow Beach

These I.D. numbers should be shown on all reports of chemical analysis and operations from the respective treatment facilities and microbiological analyses from representative points within the respective distribution system.

These should be reported to Mr. John McFadyen in this office monthly.

Thank you for your continued cooperation.

Very truly yours,

Charles E. Rundgren, Head

Water Supply Branch

Environmental Health Section

CER: chf

cc: Mr. M. P. Bell

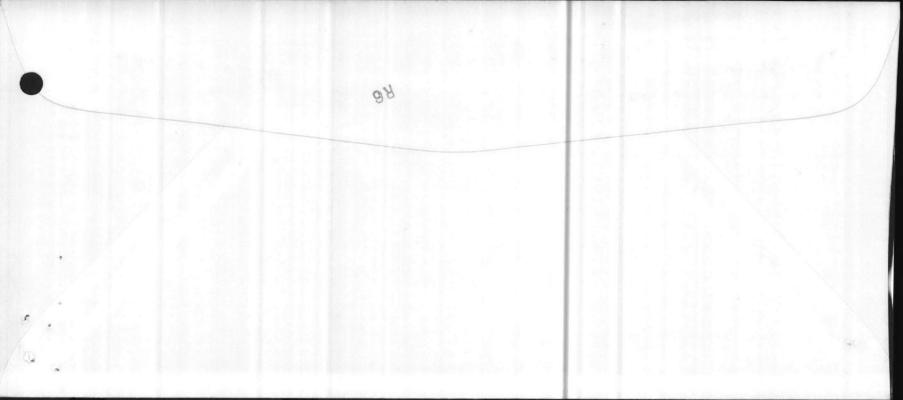
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SDWA

STATE OF NORTH CAROLINA
DEPARTMENT OF HUMAN RESOURCES
DIVISION OF HEALTH SERVICES
P. O. BOX 2091
RALEIGH, NORTH CAROLINA 27602 -2091



Commanding General Attn: R. F. Calta, Lieutenant Colonel USMC Base Maintenance Officer USMC Camp Lejeune Camp Lejeune, North Carolina 28542



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

NREAD/TS/th 6240 8 Oct 1982

From: Director,

To Assistant Chief of Staff, Facilities

Subj: Hazardous Waste Disposal Inspections; status of Camp Lejeune (MCB) Storage Facility

Ref: (a) Mtg btwn Ray Church (NC Div of Health Services), Jim Norris (TMO),
D. Sharpe and T. Stamps (NREAD) on 6 Oct 1982

(b) Fed Regs 40 CFR, 264 and 265

- 1. During reference (a) it was determined that the following requirements must be met before the hazardous waste storage facility (TP-451 and adjacent building) will be in compliance with reference (b) standards:
 - a. Install fence and gates
- b. Install signs "Danger Unauthorized personnel keep out" at all entry points and sides of area (four signs minimum)
 - c. Install appropriate fire extinguishers
 - d. Provide absorbent materials for spill clean-up inside both buildings
 - e. Provide telephone or fire alarm at a location external to buildings.
- A letter from the state to the Commanding General stating the above is forthcoming.

J. I. WOOTEN

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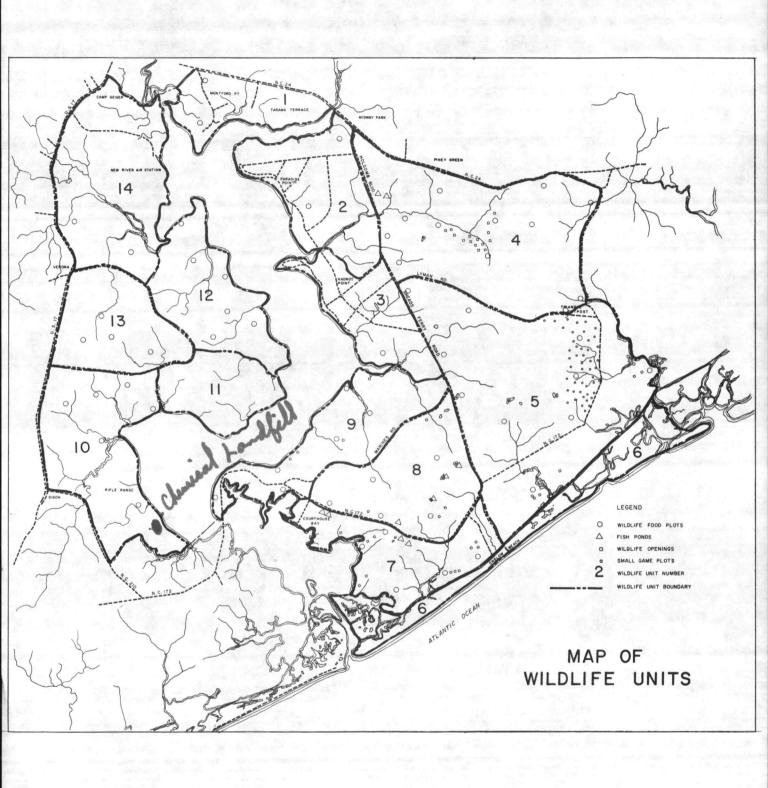
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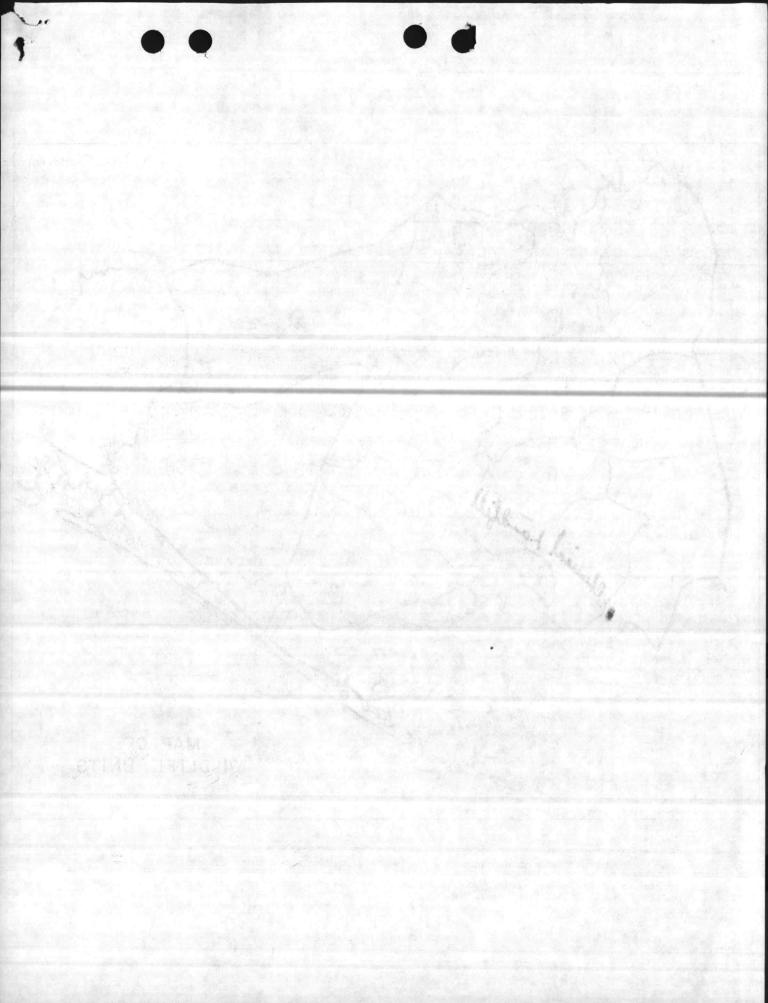
TURA RESOURCES AND ENVIRONMENT AF THE RS BRANCH Base Maintenance Division Marine Corps Base Camp Lejeune, North Carolina 28542 Date 6 Oct 82 Director, NREAB Subj: Chinical Landfill - Now or Marting Gar disposal 1955 On 5 oct 82 1Tcol Fitzgerald, Ac/s For Maj L. Scutter STA and I met Mr Jury Cochelle (Retired Bore Maint Heavy Equipment Operator) at Suly tandfill in & Carra of Bost. Mr. Rochelle show as where he burred app 50 en 55 gal drevis of suly Gas. He discribed for he ware dung well protection NBC Gray (Sur much its). Mo Rochelle also mentioned another San disposal sit mas old son mill site. off Holeomb Blod. He voluntured to show we the site on 8 Oct 82.

copy of whaches map provide LT col Fitz gerald on 5 Det 82 or requested. - Mwill be with Moj Scutter mino on suly sos. Julian

5 oct 82 by T. Worten Chemical Landfell Rille Rouge . Nevel or Mustard Gaz Disposal Esti Off 50 to 55 gal drums Nerve or Mutard Gas Disposal Site > New River * Not to Seal writt Breek

5 00 7 82 WAR Number W. Merstand Car Tinford 6 st. Name of Murcland Cong. Frighead Soll Court Greeker





ROUTINE

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PAGE 01

RT TUZYUW RUEACMC6537 2952323-UUUU--RUEBDOA. ZNR UUUUU

R 221444Z OCT 82

FM CMC WASHINGTON DC

TO AIG EIGHT ACT: MCB

BT

UN CLAS //N11000//

SUBJ: HAZARDOUS WASTE RECORDKEEPING AND REPORTING ROMTS (CMC CODE LFF-2)

A. CMC 101425 Z. MAR 82

B. MCBUL 6280 OF 1 MAY 80 WITH CH 1-2

C. FEDERAL REGISTER VOL 47 FR44938 OF 12 OCT 82 (NOTAL)

1. REF A ADVISED OF ENVIRONMENTAL PROTECTION AGENCY (EPA)

SANCTIONED DELAY FOR IMPLEMENTING THREE ROMTS UNDER ITS HAZARDOUS WASTE (HW) REGULATIONS. PUBLISHED UNDER SUBTITLE C OF RESOURCE CONSERVATION AND RECOVERY ACT (RCRA). AND IMPLEMENTED BY REF B. FOL SUMMARIZES REF C ANNOUNCEMENT RE SUBJ ROMTS:

A. 1981 ANNUAL RPT: GENERATOR AND TREATMENT. STORAGE. AND DISPOSAL (TSD) FACILITY RPTS FOR CALENDAR YEAR 1981 MUST BE POSTMARKED TO APPROPRIATE REGIONAL OFFICE OF EPA NLT 10 JAN 83. (EPA TO PRINT AND DISTRIBUTE ANNUAL RPT FORMS. IF FORMS NOT RCVD BY 30 NOV 82. REC CONTACT COGNIZANT ENGINEERING FIELD DIV OF

PAGE 02 RUFACMC6537 UNCLAS

B. QUARTEPLY GROUND-WATER MONITORING RPTS: OPERATORS OF HW SURFACE IMPOUNDMENTS, LANDFILLS, AND LAND TREATMENT FACILITIES MUST SUBMIT 6 MAR 82, 3 JUN 82, AND 3 SEP 82 GROUND-WATER MONITORING ANALYSIS RPTS IMMEDIATELY. (THE FINAL QUARTERLY RPT IS DUE 4 DEC 82)

C. GROUND-WATER QUALITY ASSESSMENT PROGRAM OUTLINE: THOSE TSD FACILITIES PEOULRING AN OUTLINE OF A GROUND-WATER QUALITY ASSESSMENT PROGRAM SHOULD NOW HAVE IT ON-SITE, AVAILABLE FOR REVIEW UPON REQUEST BY EPA REGULATORY OFFICIALS.

2. THESE CHANGES DO NOT AFFECT ANY MORE STRINGENT ROMTS IMPOSED BY STATES.

3. QUESTIONS RE THIS SUBJ SHOULD BE DIRECTED TO MR. PAUL HUBBELL AT AV 224-2171/3188.

BT #6 53 7

ORIGINAL ACTION

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ACT: BFAC

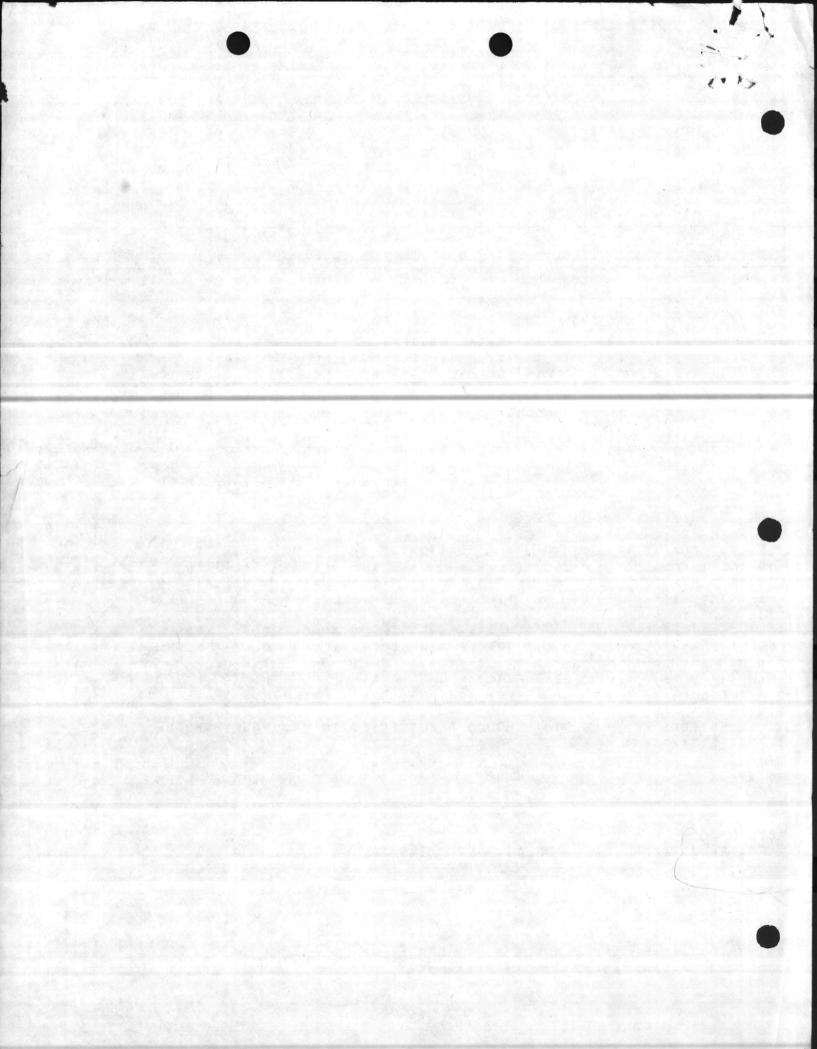
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PAGE 01

RT TUZYUW RUEACMC6537 2952323-UUUU--RUEBDOA. ZNR UUUUU R 2214447 OCT 82 FM CMC WASHINGTON DC TO AIG EIGHT ACT: MCB BT UN CLAS //N11000//

SUBJ: A HAZAPHOUS WASTE RECORDKEEPING AND REPORTING ROMTS (CMC CODE LF F- 2)

A. CMC 1014257 MAR 82

MCBUL 6280 OF 1 MAY 80 WITH CH 1-2

FEDERAL REGISTER VOL 47 FR44938 OF 12 OCT 82 (NOTAL)

REF A ADVISED OF ENVIRONMENTAL PROTECTION AGENCY (EPA) SAICTIONED DELAY FOR IMPLEMENTING THREE ROMTS UNDER ITS HAZARDOUS WASTE (HW) PEGULATIONS . PURLISHED UNDER SUBTITLE C OF RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) . AND IMPLEMENTED BY REF B.

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PAGE 02 RUFACMC6537 UNCL AS

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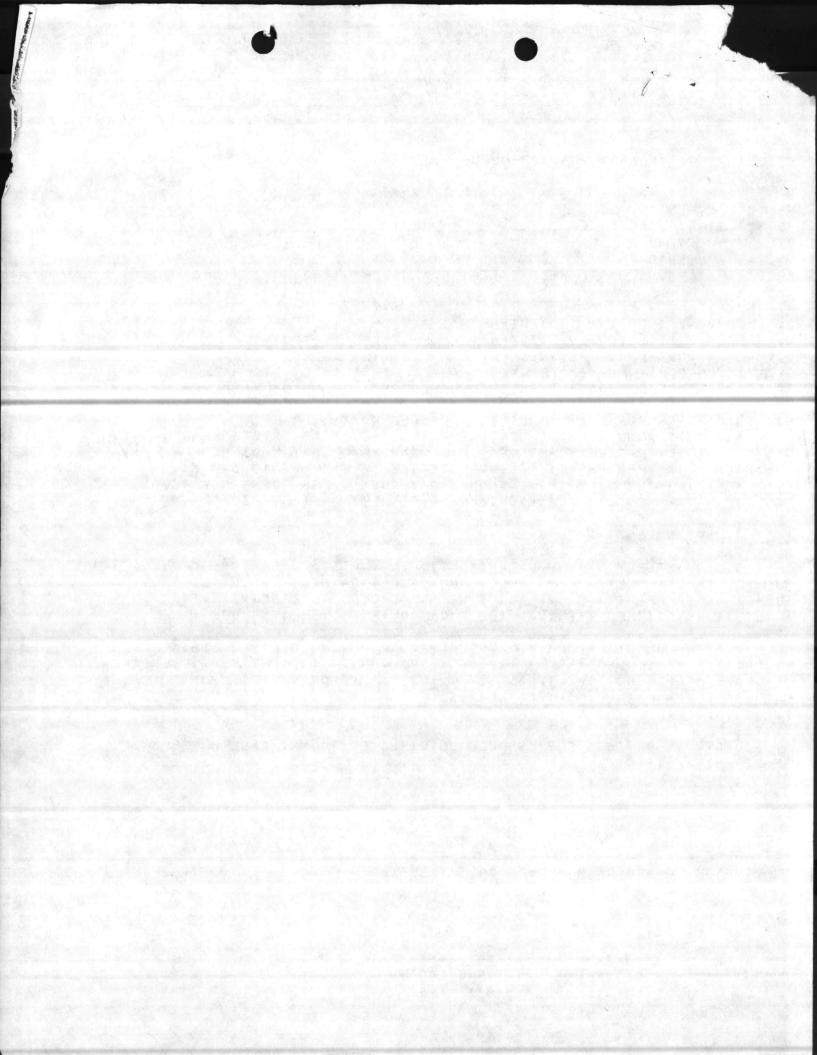
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ACT: BFAC INFO: BADJ, COMP, MAIN, BPWO, DOST //345//

ROUTINE

GRIGINA



MAIN/DDS/th 6240 SEP 2 8 1982

Mr. Gordon Layton
Solid and Hazardous Maste Branch
Environmental Health Section, Division of
Health Services
Post Office Box 2091
Raleigh, North Carolina 27602-2091

Dear Sir:

The enclosed information is provided per your request of 22 September 1982. The list is representative of the kinds and quantities of medicines and medical supplies which are disposed of annually by military medical organizations assigned to Marine Corps Base, Camp Lejeune. Please advise of any items on the list which cannot be disposed of at the Base Sanitary Landfill (Permit No. 67-03).

Questions regarding this matter should be forwarded to Mr. Danny Sharpe at telephone extension (919) 451-2083.

Sincerely,

R. F. CALTA Lieutenant Colonel, U. S. Marine Corps Base Maintenance Officer By direction of the Commanding General

Encl

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The Secretary

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MAIN/JIW/th 6240 SEP 2 1 1982

From: Base Maintenance Officer To: Staff Judge Advocate

Subj: Hazardous Waste Regulations

Encl: (1) Div of Health Ser 1tr of 1 Sep 1982

- 1. Natural Resources and Environmental Affairs personnel have discussed the enclosure with Mr. Emil Breckling, North Carolina Solid and Hazardous Waste Branch. He advised that Camp Lejeune, as a federal facility, was exempt from the requirements. However, it is requested your office review the enclosure and provide an opinion.
- 2. Point of contact is Mr. Danny Sharpe, Natural Resources and Environmental Affairs Branch, extension 1690.

R. F. CALTA

SEP & 1982

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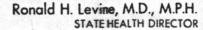
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DIVISION OF HEALTH SERVICES P.O. Box 2091 Raleigh, N.C. 27602-2091

September 1, 1982

TO:

Owners and Operators

Hazardous Waste Treatment, Storage

or Disposal Facilities in North Carolina

FROM:

Glenn Dunn, Attorney

Solid & Hazardous Waste Management Branch

SUBJECT:

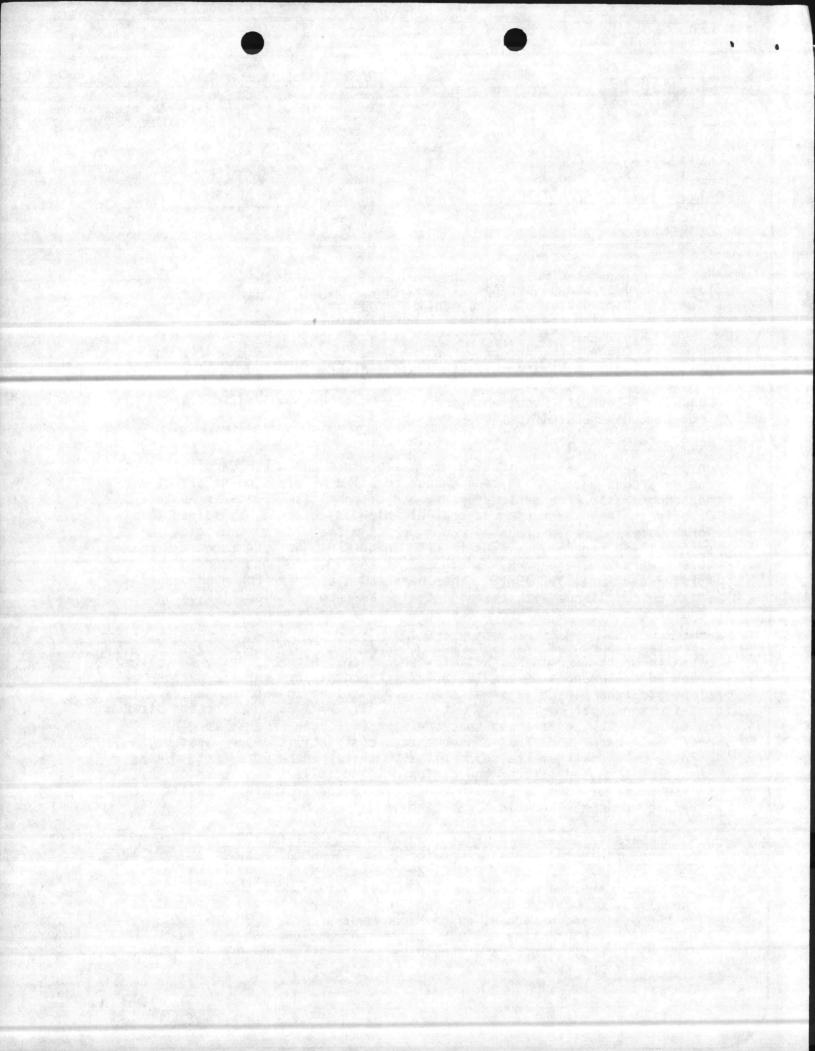
Financial Requirements for TSDF's - Changed Deadlines and

Other Clarifications

On July 7, 1982, a notification was mailed from the North Carolina Solid and Hazardous Waste Management Branch to all owners and operators of hazardous waste treatment, storage, and disposal facilities in North Carolina. That memorandum, a copy of which is attached, explained that North Carolina would probably adopt verbatim the Federal financial responsibility regulations as set forth in 40 CFR, Part 264 Subpart H and 40 CFR Part 265 Subpart H, as adopted on May 19, 1980 and amended on April 7 and April 16, 1982. That memorandum also set forth the dates on which compliance with the financial assurance and liability coverage regulations will be enforced (see the July 7 memorandum).

Since the memorandum was sent, the Federal rules have been adopted verbatim in North Carolina as anticipated. Also, in the interim, two well-attended conferences were held in Raleigh and Hickory for the purpose of clarifying the financial requirements regulations to the industries and institutions that must comply with them. It was apparent from the discussions at the conferences that the financial requirements were not completely understood and, consequently, most facilities are just beginning to make arrangements to comply with them. There were certain key points that caused most of the confusion, and it is the purpose of this follow-up memorandum to clarify those points and to further explain the schedule for compliance in North Carolina.

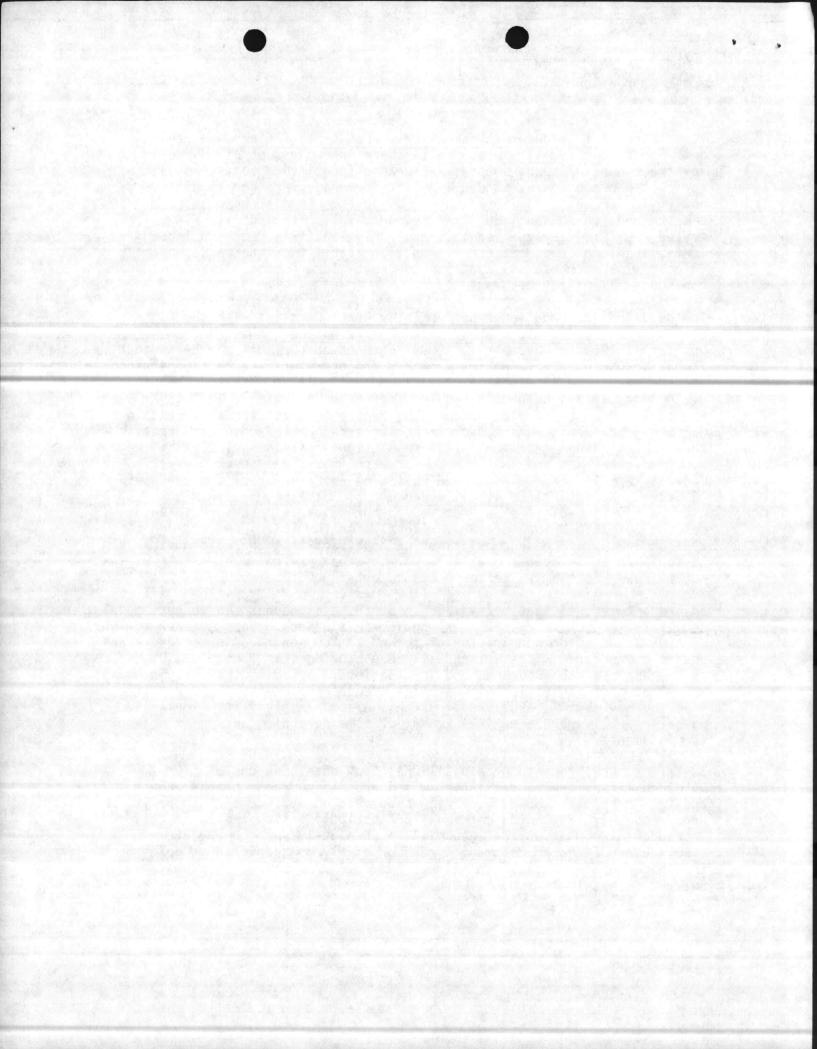
-- North Carolina is authorized to implement the entire RCRA regulatory program within the State. Therefore, the financial regulations are administered by the Solid and Hazardous Waste Management Branch of the North Carolina Department of Human Resources, not the EPA. All questions, communications, and required documents should be submitted to the Solid and Hazardous Waste Management Branch, P.O. Box 2091, Raleigh, North Carolina 27602, should indicate that it relates to financial requirements, and should be to the Attention of Glenn Dunn.



- --It is essential to determine accurately what type of financial requirements your facility must meet. There are four separate purposes for the financial requirements: assurance for closure costs, assurance for post-closure costs, sudden liability coverage, and non-sudden liability coverage. All TSDF's must provide some form of assurance for closure and non-sudden liability coverage, unless the facility is exempted explicitly by the regulations. Only landfills, surface impoundments, and land treatment facilities (i.e. facilities that are subject to post-closure measures) must provide post-closure cost assurances and non-sudden liability coverage.
- -- The deadline for compliance by TSDF's in North Carolina with the financial assurances for closure and post-closure has been changed from October 1, 1982 to November 1, 1982. The reason for this change is that it has become apparent that many owners and operators are just beginning to understand the alternative mechanisms available to them and the nature of the documentation that is required for each mechanism. This is a particularly acute problem because the regulations require that certain documents be submitted for each mechanism and that the documents contain the exact wording specified in the regulations. The description of the required documents and the wording for each is set out in the April 7 Federal Register (for closure and post-closure assurances) and the April 16 Federal Register (for liability coverage). The requirements for closure and post-closure assurances are more clearly described in an excellent Guidance Manual prepared recently for the EPA. However, due to the complexity of these regulations and the fact that the Guidance Manual has only recently become available, it is apparent that many TSDF's will not be ready to submit the correct documents by October 1, 1982.

In order to ensure that every TSDF in North Carolina has the correct model documents to use, every TSDF must notify this Branch before October 1, 1982 of the mechanism or combination of mechanisms chosen to assure closure and post-closure care. This Branch will then provide each facility with copies of the appropriate documents and instructions. By doing this, it is our hope that most facilities will provide adequate documents the first time (i.e. by November 1, 1982) and thus this Branch and facility owners and operators will spend a minimal amount of time returning and re-executing the documents.

It is not our intent to prohibit TSDF's from obtaining copies of the Guidance Manual or the regulations, and proceeding ahead of the above-outlined schedule. However, if you choose to do so, you are strongly urged to obtain the Guidance Manual and strictly follow the instructions and documents in it so that you will be absolutely sure to execute and submit every required document worded precisely as specified. Copies of the Guidance Manual may be obtained from: 1CF, Inc. 1850 K Street, N.W., Suite 950, Washington, D.C. 20006.

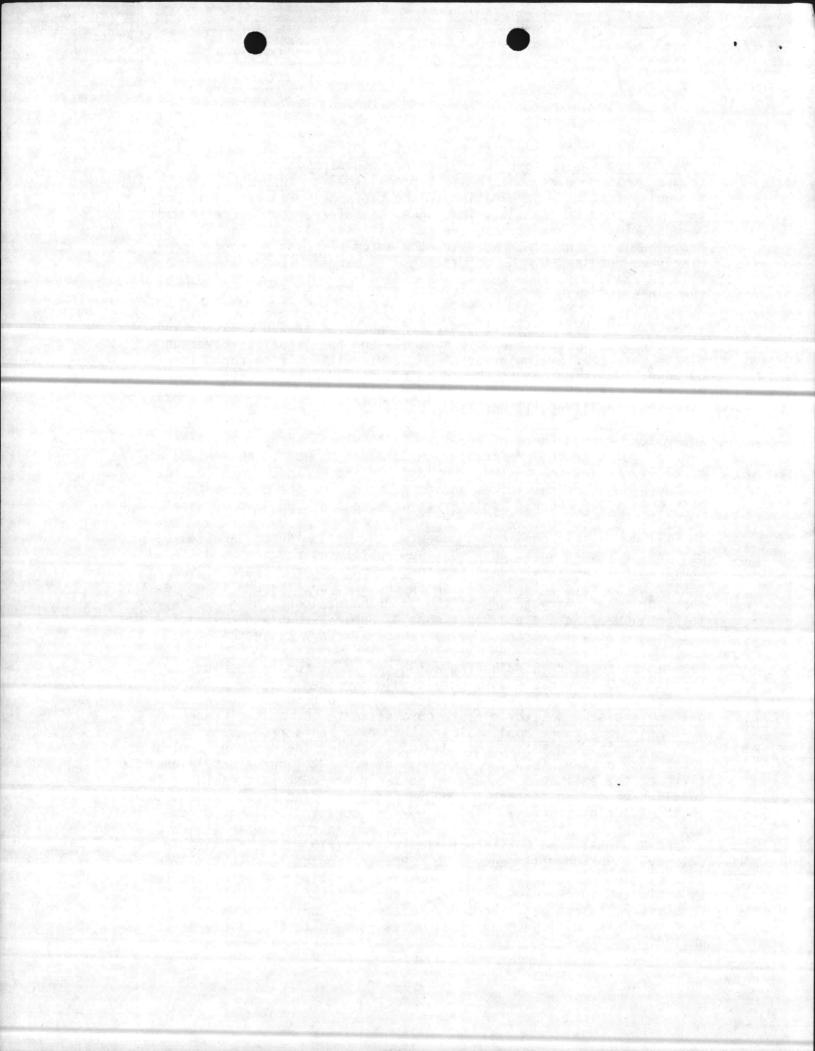


--The date for compliance with financial requirements for sudden liability coverage remains October 1, 1982. The mechanisms that can be used to meet this requirement are limited to liability insurance, the financial test or a combination of the two. Most facilities already have some form of liability insurance, therefore, compliance should be much simpler than for closure and post-closure care and the October deadline is reasonable. However, the documents must be worded precisely as required by the regulations. A manual with model documents will be ready very soon and can be ordered from the same address as the financial assurances manual.

Those TSDF's that choose to use the financial test for closure (and post-closure, if applicable) assurances and for liability coverage please note that a single set of documents will suffice for this purpose. Those documents should be submitted to this Branch by October 1, and the extension to November 1 of the closure/post-closure assurance deadline will not apply to you.

Again let me urge those of you that follow this approach the April 16 Federal Register or, preferably the Guidance Manual to obtain and carefully follow the instructions and wording for documents provided in those publications. I am enclosing a copy of the pertinent pages of the April 16 Federal Register to be sure that you have it available.

- --In filling out all required documents, the words "North Carolina Department of Human Resources" must be substituted for the words "Administrator", Regional Administrator" or "Director". Each of the latter terms refers to a position in the EPA, but the EPA is not a party or beneficiary to any of these agreements concerning TSDF's in North Carolina and the Department of Human Resources, the administering agency in North Carolina, must therefore be substituted.
- --Facilities that are considering using the trust fund mechanism for closure or post-closure assurance should consider that final RCRA permits will have a five year duration and the fund will therefore be required to equal the closure cost estimate (or post-closure cost estimate, where applicable) within five years from issuance of the permit. This five year period is called the "pay-in" period. Thus, each payment into the fund must be equal to approximately onefifth of the estimated closure or post-closure cost (not taking into consideration such factors as the interest the fund might earn or the costs of administration). This five-vear duration will not become applicable until the facility converts from Part A Interim Status to a Part B permit, and until that time the interim status formula for the pay-in period will apply, i.e. 20 years beginning with the effective date of the regulations or the remaining operating period of the facility as estimated in the closure plan, whichever is shorter. However, North Carolina will soon begin Part B permitting so facilities using the trust fund mechanism will soon be required to convert to the five year pay-in period.



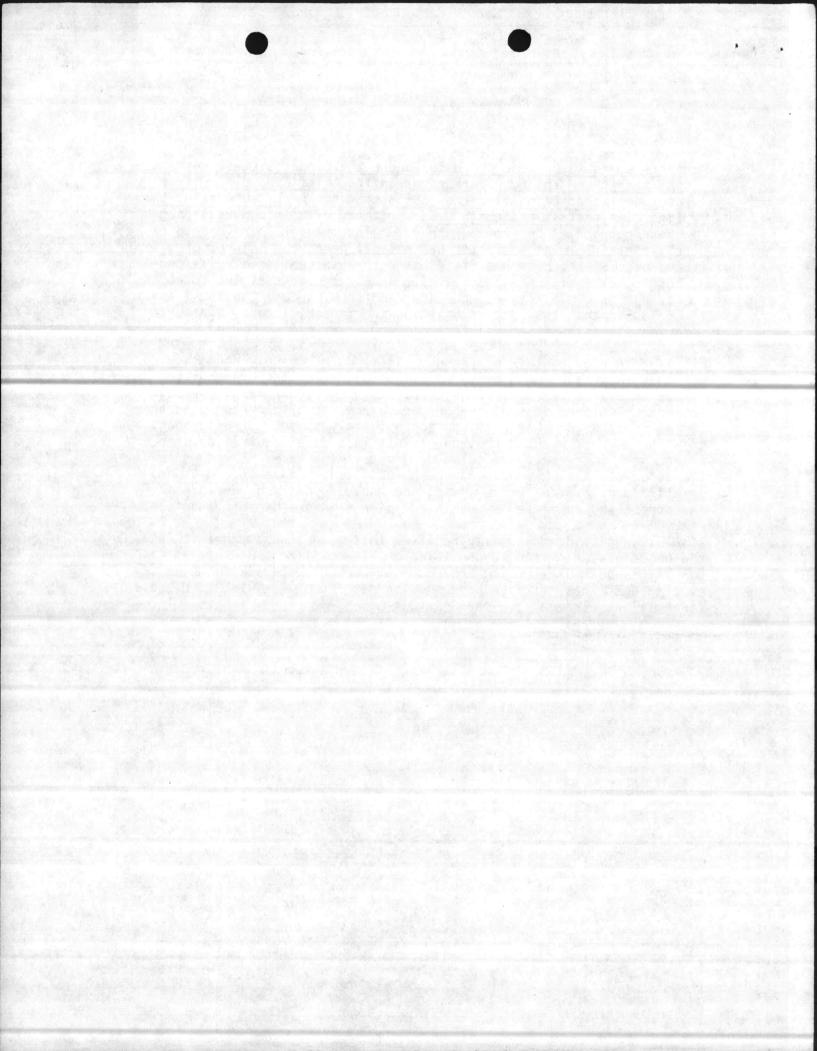
There seems to be some confusion under the financial test concerning the meaning of the four paragraphs in the Chief Financial Officer's statement that categorize the TSDF's that the Party submitting the financial test is responsible for. It may help in understanding these categories to remember that the last paragraph refers to facilities in States where the EPA has delegated the RCRA program to the host State, but that State has not yet established rules concerning financial responsibility. Also remember that the total of the number of TSDF's in each paragraph should equal the total number of TSDF's that the Party submitting the financial test is assuring by means of the financial test.

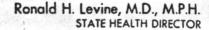
Finally, in closing this memorandum, it is unfortunately necessary to ask that those TSDF's in North Carolina that have already submitted financial assurances review the documents submitted against the regulations or Guidance Manual and prepare a new set of assurances accordingly. This Branch has received approximately 55 sets of assurances and a quick review shows that nearly all lack some required documents and/or have incorrectly executed documents. If you wish us to return the documents that have already been submitted, please inform us and we will do so. If after reviewing your submission, you conclude it is correct and complete as submitted, please inform us to that effect.

Also, I want to urge whomever receives this memorandum to get it into the hands of the person responsible for financial requirements as quickly as possible (if you are not that person) because of the impending deadlines. If you have questions or otherwise wish to discuss financial requirements, please contact me.

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

July 7, 1982

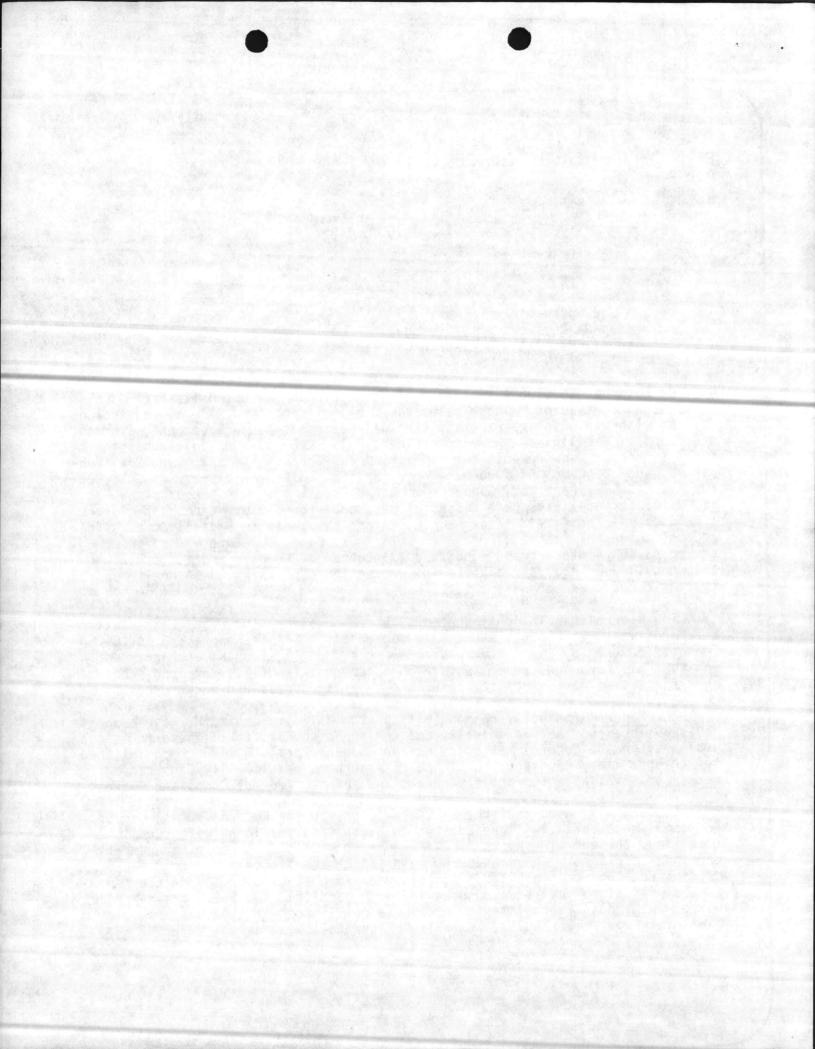
TO: Owners and Operators
Hazardous Waste Treatment, Storage
or Disposal Facilities in North Carolina

On November 19, 1980, the State of North Carolina adopted its Hazardous Waste Management Rules. These rules adopt by reference the Federal regulations dealing with financial requirements for all hazardous waste treatment, storage, and disposal facilities. More specifically, 10 NCAC 10F .0032(g) adopts the final financial requirements for facilities set forth in 40 CFR, Part 264, Subpart H, and 10 NCAC 10F .0033(h) adopts the interim financial requirements set forth in 40 CFR, Part 265, Subpart H. North Carolina's rules require that hazardous waste facilities have financial assurance for closure (and post-closure if a disposal facility). Four mechanisms are available to facility owners for accomplishing this task. These are: (1) Trust Fund; (2) Surety Bond guaranteeing payment into a trust fund; and (3) Letter of Credit; and (4) other methods that provided an equivalent degree of protection concerning human health and the environment as mechanisms 1, 2, and 3.

The Federal regulations adopted by North Carolina also require that all hazardous waste treatment, storage and disposal facilities operating in the State be covered by liability insurance for sudden (accidental) occurrences, and that all hazardous waste surface impoundments, landfills, or land treatment facilities have liability insurance covering non-sudden occurrences.

The Federal financial responsibility regulations, Subpart H, have been revised since they were originally adopted in North Carolina. These revisions, published in the Federal Registers on April 7 and April 16, 1982, accomplished two things. They expanded the financial assurance and liability insurance mechanisms available to facility owners and set new Federal compliance dates.

It is anticipated that the above revisions in the Federal rules, except for compliance dates, will be adopted in North Carolina in August. Until that time, the existing North Carolina Rules for Hazardous Waste Management continue in effect. These existing rules have been strictly enforced concerning required cost estimates for closure and post-closure. When the Federal revisions have been adopted in North Carolina, the Solid and Hazardous Waste Management Branch intends to enforce compliance with the Subpart H, Financial Requirement Rules, beginning on the following dates:



	Permitted Status & New Facilities	Interim Status & Existing Facilities		
Financial assurance for closure and post-closure care plans	At least 60 days before the first receipt of hazardous waste	October 1, 1982		
Liability coverage for sudden accidental occurrences	At least 60 days before the first receipt of hazardous waste	October 1, 1982		
Liability coverage for non-sudden accidental occurrences	At least 60 days before the first receipt of hazardous waste	Annual Sales or Revenues Date Over \$10 mil. Jan. 16, 1983 55-\$10 mil. Jan. 16, 1984 Jan. 16, 1985		

The new additional Federal mechanisms for achieving financial assurance as published in the Federal Register on April 7 and April 16, 1982 are likely to be adopted as written in North Carolina, and should therefore provide accurate guidance in your preparations for providing financial assurance by the above dates. Please contact this office at (919) 733-2178 if you have any questions regarding your responsibilities in complying with these requirements.

Sincerely,

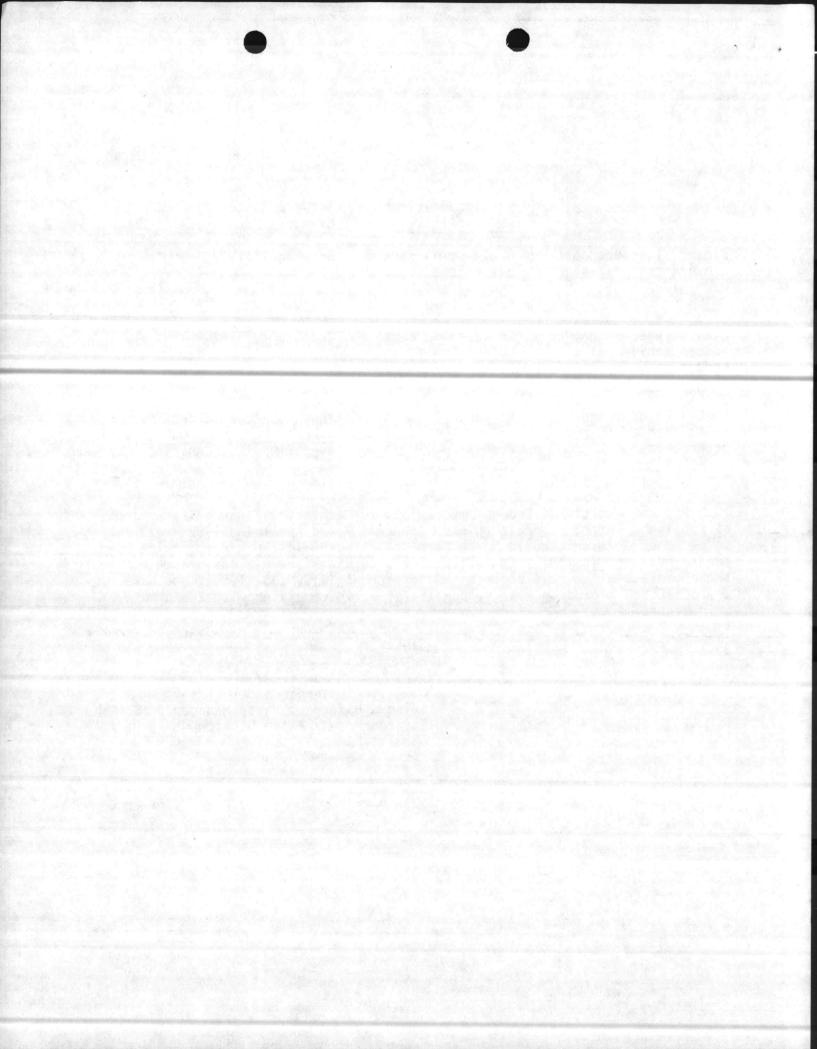
O. W. Strickland, Head

Solid & Hazardous Waste Management Branch

Environmental Health Section

OWS:nlc

Attachment



THE RULES DEFINING LIABILITY COVERAGE REQUIREMENTS ARE ON PAGES 1-3. NOTE: AND THE WORDING FOR THE INSTRUMENTS IS ON PAGES 3-5.

PART 265-INTERIM STATUS STANDARDS FOR OWNERS AND **OPERATORS OF HAZARDOUS WASTE** TREATMENT, STORAGE, AND DISPOSAL FACILITIES

Subpart H-Financial Requirements

a. Section 265.141 is revised to read as follows:

§ 265.141 Definitions of terms as used in this subpart.

(f) The following terms are used in the specifications for the financial tests for closure, post-closure care, and liability coverage. The definitions are intended to assist in the understanding of these regulations and are not intended to limit the meanings of terms in a way that conflicts with generally accepted accounting practices.
"Assets" means all existing and all

probable future economic benefits obtained or controlled by a particular

entity.

"Current assets" means cash or other assets or resources commonly identified as those which are reasonably expected to be realized in cash or sold or consumed during the normal operating cycle of the business.

"Current liabilities" means obligations whose liquidation is reasonably expected to require the use of existing resources properly classifiable as current assets or the creation of other

current liabilities.

"Independently audited' refers to anaudit performed by an independent certified public accountant in accordance with generally accepted

auditing standards.

"Liabilities" means probable future sacrifices of economic benefits arising from present obligations to transfer assets or provide services to other entities in the future as a result of past transactions or events.

"Net working capital" means current assets minus current habilities.

'Net worth" means total assets minus total liabilities and is equivalent to-

owner's equity.
"Tangible net worth" means the tangible assets that remain after deducting liabilities; such assets would not include intangibles such as goodwill and rights to patents or royalties.

(g) In the liability insurance requirements the terms "bodily injury". and "property damage" shall have the meanings given these terms by .. applicable State law. However, these terms do not include those liabilities : which, consistent with standard ... industry practice, are excluded from coverage in liability policies for bodily injury and property damage. The

Agency intends the meanings of other terms used in the liability insurance requirements to be consistent with their common meanings within the insurance industry. The definitions given below of several of the terms are intended to assist in the understanding of these regulations and are not intended to limit their meanings in a way that conflicts with general insurance industry usage.

'Accidental occurrence" means an accident, including continuous or repeated exposure to conditions, which results in bodily injury or property damage neither expected nor intended from the standpoint of the insured.

"Legal defense costs" means any expenses that an insurer incurs in defending against claims of third parties brought under the terms and conditions of an insurance policy.

"Nonsudden accidental occurrence" means an occurrence which takes place over time and involves continuous or

repeated exposure.

Sudden accidental occurrence" means an occurrence which is not continuous or repeated in nature.

\$ 265.147 Liability requirements.

(a) Coverage for sudden accidental occurrences. By the effective date of these regulations, an owner or operator of a hazardous waste treatment, storage, or disposal facility, or a group of such facilities, must demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility or group of facilities. The owner or operator must have and maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million. exclusive of legal defense costs. This liability coverage may be demonstrated in one of three ways, as specified in paragraphs (a)(1), (a)(2), and (a)(3) of

(1) An owner or operator may demonstrate the required liability coverage by having liability insurance as specified in this paragraph.

(i) Each insurance policy must be amended by attachment of the Hazardous Waste Facility Liability Endorsement or evidenced by a Certificate of Liability Insurance. The wording of the endorsement must be identical to the wording specified in § 284.151(i). The wording of the certificate of insurance must be identical to the wording specified in \$ 254.151(j). The owner or operator must submit a signed duplicate original of the andorsement or the certificate of

insurance to the Regional Administrator, or Regional Administrator if the facilities are located in more than one Region. If requested by a Regional Administrator, the owner or operator must provide a signed duplicate original

of the insurance policy.

(ii) Each insurance policy must be issued by an insurer which, at a minimum, is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more

(2) An owner or operator may meet the requirements of this section by passing a financial test for liability coverage as specified in paragraph (f) of

this section.

(3) An owner or operator may demonstrate the required liability coverage through use of both the financial test and insurance as these mechanisms are specified in this section. The amounts of coverage demonstrated must total at least the minimum amounts required by this

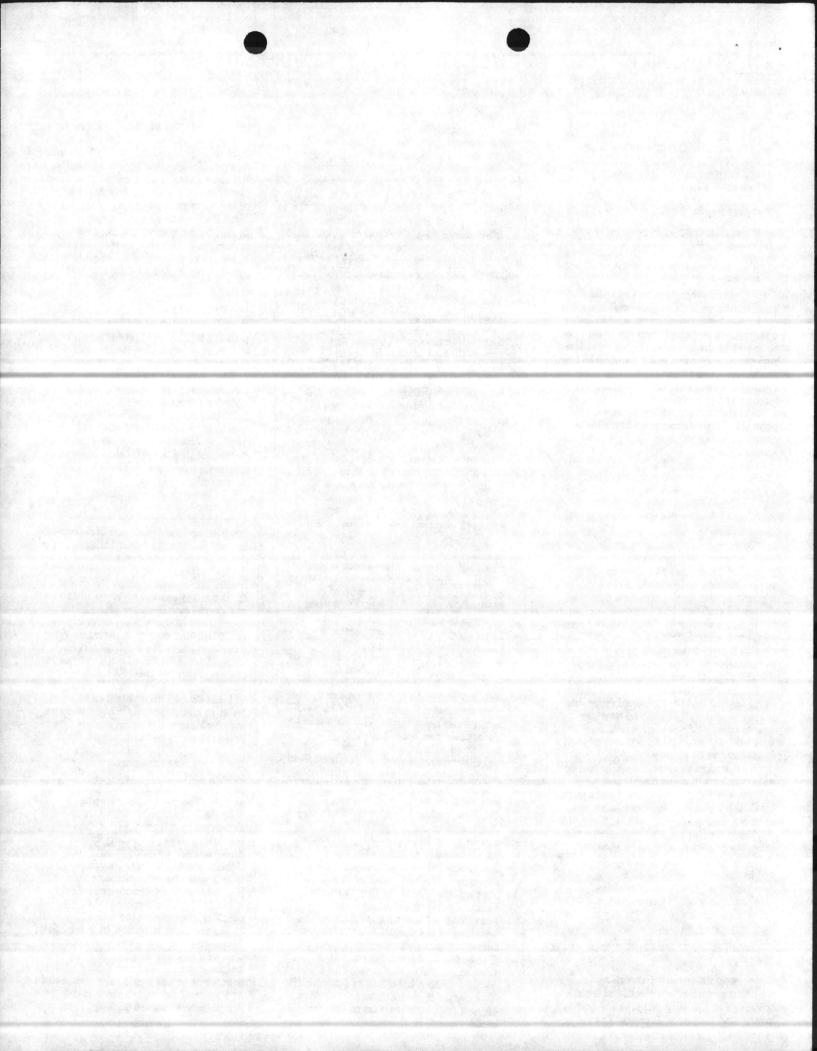
paragraph.

(b) Coverage for nonsudden accidental occurrences. An owner or operator of a surface impoundment landfill, or land treatment facility which is used to manage hazardous waste, or a group of such facilities, must demonstrate financial responsibility for bodily damage and property damage to third parties caused by nonsudden accidental occurrences arising from operations of the facility or group of facilities. The owner or operator must have and maintain liability coverage for nonsudden accidental occurrences in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$8 million, exclusive of legal defense costs. This liability coverage may be demonstrated in one of three ways, as specified in paragraphs (b)(1), (b)(2), and (b)(3) of this section:

(1) An owner or operator may demonstrate the required liability coverage by having liability insurance

as specified in this paragraph. (i) Each insurance policy must be amended by attachment of the Hazardous Waste Facility Liability Endorsement or evidenced by a Certificate of Liability Insurance. The wording of the endorsement must be identical to the wording specified in \$ 284.151(i). The wording of the certificate of insurance must be identical to the wording specified in § 284.151(j). The owner or operator must submit a signed duplicate original of the endorsement or the certificate of insurance to the Regional Administrator, or Regional Administrators if the

I facilities are located in more than one



of the insurance policy.

(ii) Each insurance policy must be issued by an insurer which, at a minimum, is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

(2) An owner or operator may meet the requirements of this section by passing a financial test for liability coverage as specified in paragraph (f) of

this section.

(3) An owner or operator may demonstrate the required liability coverage through use of both the financial test and insurance as these mechanisms are specified in this section. The amounts of coverage must total at least the minimum amounts required by this paragraph.

(4) The required liability coverage for nonsudden accidental occurrences must be demonstrated by the dates listed below. The total sales or revenues of the owner or operator in all lines of business, in the fiscal year preceding the effective date of these regulations, will determine which of the dates applies. If the owner and operator of a facility are two different parties, or if there is more than one owner or operator, the sales or revenues of the owner or operator with the largest sales or revenues will determine the date by which the coverage must be demonstrated. The dates are as follows:

(i) For an owner or operator with sales or revenues totalling \$10 million or more, 6 months after the effective date

of these regulations.

(ii) For an owner or operator with sales or revenues greater than \$5 million but less than \$10 million, 18 months after the effective date of these regulations.

(iii) All other owners or operators, 30 nonths after the effective date of these

regulations.

(5) By the date 6 months after the effective date of these regulations an owner or operator who is within either of the last two categories (paragraphs (b)(4)(ii) or (b)(4)(iii) of this section) must, unless he has demonstrated liability coverage for nonsudden accidental occurrences, send a letter to the Regional Administrator stating the date by which he plans to establish such

(c) Request for variance. If an owner or operator can demonstrate to the satisfaction of the Regional Administrator that the levels of financial responsibility required by peregraphs (a) or (b) of this section are not consistent with the degree and duration of risk associated with treatment storage, or disposal at the facility or fi group of facilities, the owner or operator may obtain a variance from the Regional Administrator. The request for a variance must be submitted in writing to the Regional Administrator. If grant

the variance will take the form of an adjusted level of required liability coverage, such level to be based on the Regional Administrator's assessment of the degree and duration of risk associated with the ownership or operation of the facility or group of facilities. The Regional Administrator may require an owner or operator who requests a variance to provide such technical and engineering information as is deemed necessary by the Regional Administrator to determine a level of financial responsibility other than that required by paragraphs (a) or (b) of this section. The Regional Administrator will process a variance request as if it were a permit modification request under 122.15(a)(7)(iii) of this Chapter and subject to the procedures of § 124.5 of this Chapter. Notwithstanding any other provision, the Regional Administrator may hold a public hearing at his. discretion or whenever he finds, on the basis of requests for a public hearing, a significant degree of pubic interest in a

tentative decision to grant a variance.

(d) Adjustments by the Regional Administrator. If the Regional Administrator determines that the levels of financial responsibility required by paragraphs (a) or (b) of this section are not consistent with the degree and duration of risk associated with treatment, storage, or disposal at the facility or group of facilities, the Regional Administrator may adjust the level of financial responsibility required under paragraphs (a) or (b) of this section as may be necessary to protect human health and the environment. This adjusted level will be based on the Regional Administrator's assessment of the degree and duration of risk : associated with the ownership or operation of the facility or group of facilities. In addition, if the Regional Administrator determines that there is a significant risk to human health and the environment from nonsudden accidental occurrences resulting from the operations of a facility that is not a surface impoundment, landfill, or land treatment facility, he may require that an owner or operator of the facility comply with paragraph (b) of this section. An owner or operator must furnish to the Regional Administrator, within a reasonable time, any information which the Regional Administrator requests to determine whether cause exists for such adjustments of level or type of coverage. The Regional Administrator will process an adjustment of the level of required coverage as if it were a permit modification under § 122.15(a)(7)(iii) of this Chapter and subject to the procedures of § 124.5 of this Chapter.

Notwithstanding any other provision,

public hearing at his discretion or

whenever he finds, on the basis of

requests for a public hearing, a

the Regional Administrator may hold a

significant degree of public interest in a

tentative decision to adjust the level or

(e) Period of coverage. An owner or operator must continuously provide liability coverage for a facility as required by this section until certifications of closure of the facility, as specified in § 265.115, are received by the Regional Administrator.

(f) Financial test for liability coverage. (1) An owner or operator may satisfy the requirements of this section . by demonstrating that he passes a financial test as specified in this paragraph. To pass this test the owner or operator must meet the criteria of paragraph (f)(1)(i) or (f)(1)(ii):

(i) The owner or operator must have: (A) Net working capital and tangible net worth each at least six times the amount of liability coverage to be demonstrated by this test; and

(B) Tangible net worth of at least \$10

million; and

(C) Assets in the United States amounting to either: (1) At least 90 percent of his total assets; or (2) at least six times the amount of liability coverage to be demonstrated by this

(ii) The owner or operator must have:

(A) A current rating for his most recent bond issuance of AAA, AA, A, or BBB as issued by Standard and Poor's, . or Aaa, Aa, A, or Baa as issued by Moody's; and

(B) Tangible net worth of at least \$10

million; and

(C) Tangible net worth at least six times the amount of liability coverage to be demonstrated by this test; and

(D) Assets in the United States amounting to either: (1) at least 90 percent of his total assets; or (2) at least six times the amount of liability coverage to be demonstrated by this

(2) The phrase "amount of liability coverage" as used in paragraph (f)(1) of this section refers to the annual aggregate amounts for which coverage is required under paragraphs (a) and (b) of

(3) To demonstrate that he meets this test, the owner or operator must submit the following three items to the Regional

Administrator:

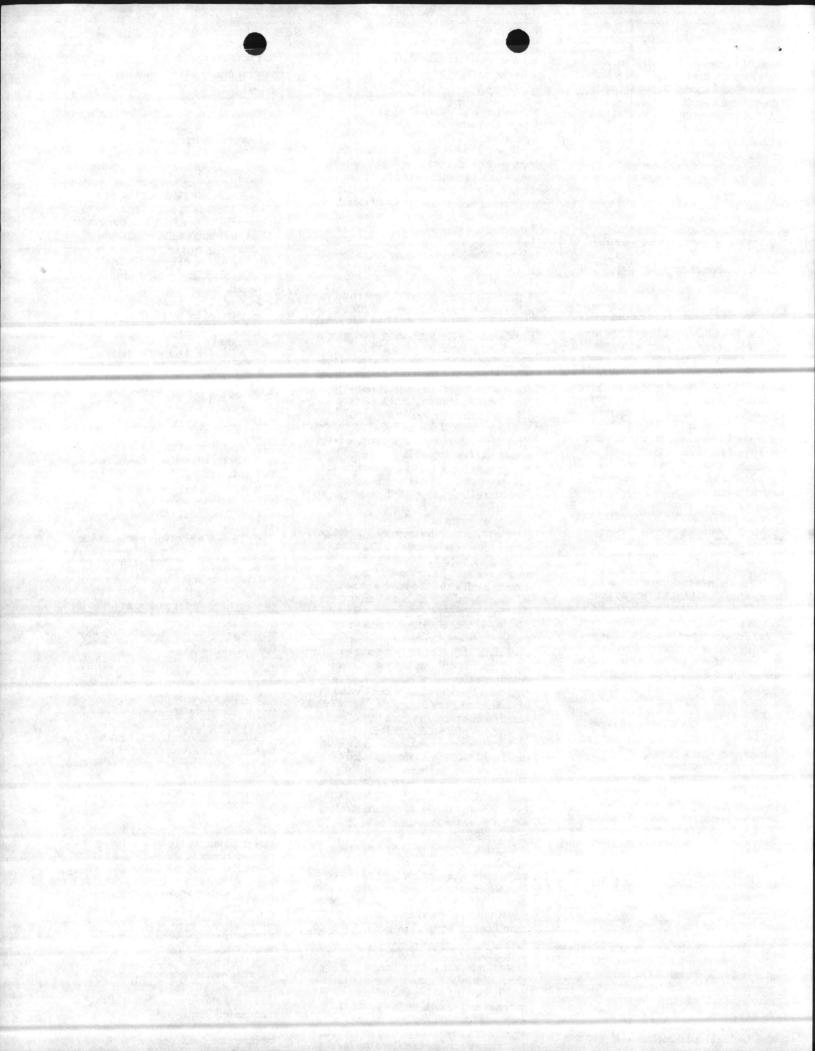
(i) A letter signed by the owner's or operator's chief financial officer and worded as specified in § 264.151(g). If an owner or operator is using the financial test to demonstrate both assurance for closure or post-closure care, as specified by §§ 284.143(f), 284.145(f), 265.143(e). and 265.145(e), and liability coverage, he must submit the letter specified in 284.151(g) to cover both forms of . financial responsibility; a separate letter as specified in § 264.151(f) is not required.

(ii) A copy of the independent certified public accountant's report on examination of the owner's or operator's financial statements for the latest

(iii) A special report from the owner's

completed fiscal year.

or operator's independent certified



(A) He has compared the data which the letter from the chief financial officer specifies as having been derived from . the independently audited, year-end financial statements for the latest fiscal year with the amounts in such financial statements; and

(B) In connection with that procedure. no matters came to his attention which caused him to believe that the specified

data should be adjusted.

(4) The owner or operator may obtain a one-time extension of the time allowed for submission of the documents specified in paragraph (f)(3) of this section if the fiscal year of the owner or operator ends during the 90 days prior to the effective date of these regulations and if the year-end financial statements for that fiscal year will be audited by an independent certified public accountant. The extension will end no later than 90 days after the end of the owner's or operator's fiscal year. To obtain the extension, the owner's or operator's chief financial officer must send, by the effective date of these regulations, a letter to the Regional Administrator of each Region in which the owner's or operator's facilities to be covered by the financial test are located. This letterfrom the chief financial officer must: [1] Request the extension;

(ii) Certify that he has grounds to believe that the owner or operator meets the criteria of the financial test:

(iii) Specify for each facility to be covered by the test the EPA. Identification Number, name, address. the amount of liability coverage and, when applicable, current closure and post-closure cost estimates to be covered by the test;

(iv) Specify the date ending the owner's or operator's last complete fiscal year before the effective date of

these regulations; .

(v) Specify the date, no later than 90 days after the end of such fiscal year. when he will submit the documents specified in paragraph (f)(3) of this section; and

(vi) Certify that the year-end financial statements of the owner or operator for such fiscal year will be audited by an independent certified public accountant.

(5) After the initial submission of items specified in paragraph (f)(3) of this section, the owner or operator must send updated information to the Regional Administrator within 90 days after the close of each succeeding fiscal year. This information must consist of all three items specified in paragraph (f)(3) of this section.

(b) If the owner or operator no longer meets the requirements of paragraph (f)(1) of this section, he must obtain insurance for the entire amount of required liability coverage as specified in this section. Evidence of insurance must be submitted to the Regional Administrator within 90 days after the end of the fiscal year for which the yearend financial data show that the owner or operator no longer meets the test requirements.

(7) The Regional Administrator may disallow use of this test on the basis of qualifications in the opinion expressed by the independent certified public accountant in his report on examination of the owner's or operator's financial statements (see paragraph (f)(3)(ii) of this section). An adverse opinion or a disclaimer of opinion will be cause for disallowance. The Regional Administrator will evaluate other qualifications on an individual basis. The owner or operator must provide evidence of insurance for the entire

amount of required liability coverage as specified in this section within 30 days after notification of disallowance.

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§ 264.151 Wording of the instruments.

(g) A letter from the chief financial officer, as specified in §§ 284.147(f) or 265.147(f) of this chapter, must be worded as follows, except that instructions in brackets are to be replaced with the relevant information and the brackets deleted:

Letter from Chief Pinancial Officer (to . semonstrate liability coverage or to demonstrate both liability coverage and

assurance of closure or post-closure care).
[Address to Regional Administrator of every Region in which facilities for which financial responsibility is to be demonstrated through the financial test are located.]

I am the chief finencial officer of [owner's er operator's name and address]. This letter er operator's name and address]. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage [insert "and closure and/or post-closure care" if applicable] as specified in Subpart H of 40 CFR Parts 204 and 205. [Pill out the following paragraph regarding facilities and liability coverage. For each facility, include its EPA Identification Number, name, and address.]

Number, name, and address.]

The owner or operator identified above is
the owner or operator of the following
facilities for which kellity overege is being
demonstrated through the financial test

specified in Subpart H of 40 CFR Parts 264

[If you are using the financial test to demonstrate coverage of both liability and closure and post-closure care, fill in the following four paragraphs regarding facilities and associated closure and post-closure cost estimates. If there are no facilities that belong in a particular paragraph, write "None" in the space indicated. For saich facility, include its EPA Identification Number, mems, address, and current closure and/or post-closure cost estimates. Identify each cost estimate as to whether it is for closure or post-closure care.]

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 284 and 285. The current closure and/or post-closure post estimates covered by the test are shown for each facility:

2. The swaer or operator identified above guarantees, through the corporate guarantee specified in Subport H of 40 CFR Parts 284 and 205, the closure and post-clesure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

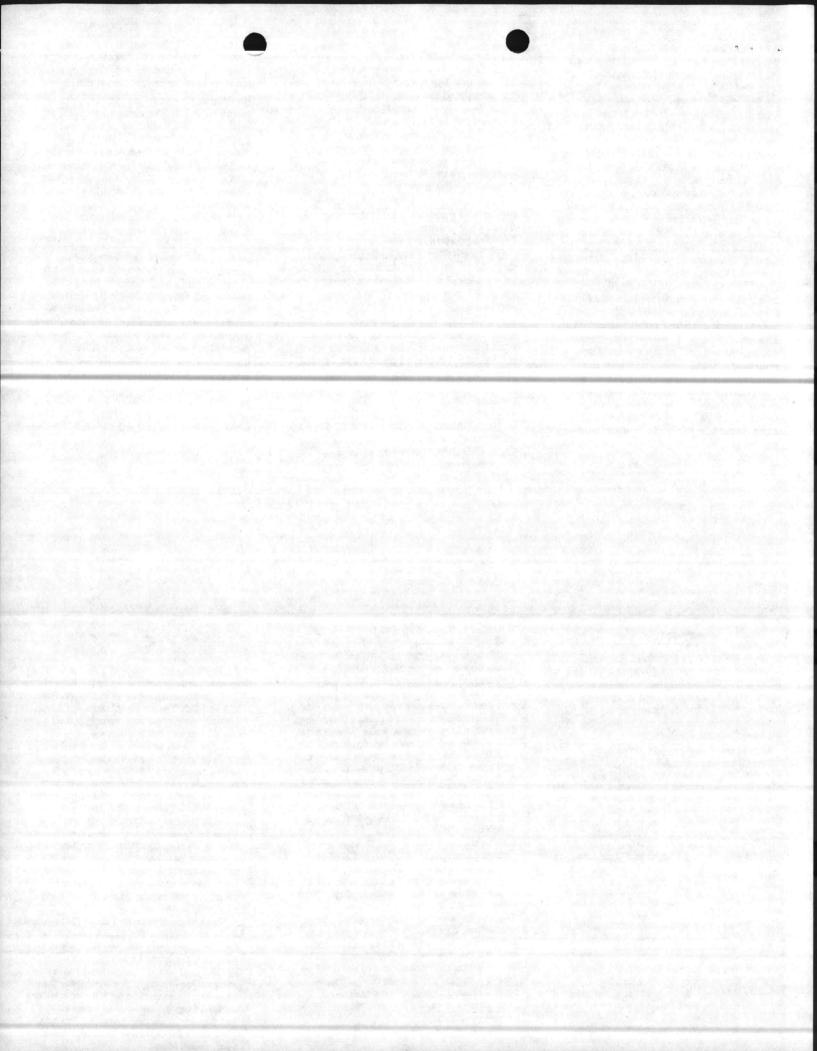
3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 284 and 285, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 335 and 226. The surrent closure and/or postsissure cost estimates covered by such a test se shown for each facility:

4. The owner or operator identified above was or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 284 and 285 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closura cost estimates not covered by such financial assurance are shown for each

This owner or operator [insert "is required" or "is not required"] to file a Form 10K with the Securities and Exchange Commission

(SEC) for the latest fiscal year. The fiscal year of this owner or operator

ends on [month, day]. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently sadited, year-end financial statements for the latest completed fiscal year, ended [date].



Part A. Liability Coverage for Accidental **ALTERNATIVE I—Continued** with the insured's obligation to demonstrate financial responsibility under 40 CFR 284.147 Occurrences 5. Tandble net worth or 265.147. The coverage applies at [list EPA 6. Net worth IFill in Alternative I if the criteria of Identification Number, name, and address for *7. Current as paragraph (f)(1)(i) of \$\$ 284.147 or 285.147 are *8. Current liabiliti each facility] for [insert "sudden accidental used. Fill in Alternative II if the criteria of 9. Net working capital (line 7 minus line occurrences," "nonsudden accidental occurrences," or "sudden and nonsudden paragraph (f)(1)(ii) of §§ 284.147 or 285.147 10. The sum of net income plus deprecietion, depletion, and amortization

"11. Total assets in U.S. (required only if
less than 90% of assets are located in are used.] accidental occurrences"; if coverage is for multiple facilities and the coverage is ALTERNATIVE ! different for different facilities, indicate YES which facilities are insured for sudden Amount of annual aggregate liability coverage to be demonstrated
 Current assets
 Current liabilities 12. Is line 5 at least \$10 million? accidental occurrences, which are insured for 12. Is the 5 at least 510 missor?
13. Is, line 5 at least 6 times line 3?
14. Is line 9 at least 6 times line 3?
15. Are at least 90% of assets located in the U.S.? If not, complete line 16
16. Is line 11 at least 6 times line 3? nonsudden accidental occurrences, and which are insured for both]. The limits of 4. Net working capital (line 2 minus line liability are [insert the dollar amount of the 3) 5. Tangible net worth 6. If loss than 90% of assets are ed in the U.S., give total U.S. : "each occurrence" and "annual aggregate" 17. Is line 4 divided by line 6 less than limits of the Insurer's liability], exclusive of 7. to line 5 at least \$10 million?
8. Is line 4 at least 6 times
9. Is line 5 at least 5 times
*10. Are at least 50% of seests
in the U.S.? If not, complete
\$1. Is line 6 at least 6 times legal defense costs. 18. Is line 10 divided by line 4 greater 2. The insurance afforded with respect to than 0.1? 19. Is line 7 divided by line 8 greater then such occurrences is subject to all of the terms and conditions of the policy; provided, however, that any provisions of the policy ALTERNATIVE II inconsistent with subsections (a) through (e) Sum or current closure and post-clo-sure cost estimates (total of all cost estimates listed above) of this Paragraph 2 are hereby amended to ALTERNATIVE II conform with subsections (a) through (e): Amount of annual aggre (a) Bankruptcy or insolvency of the insured 1. Amount of annual aggreg Amount of arrusal aggregate teletity coverage to be demonstrated Sum of lines 1 and 2 Current bond rating of most recent tesuance and name of rating service shall not relieve the Insurer of its obligations coverage to be demonstra Current bond rating of most re under the policy to which this endorsement is suance and name S. Date of lesuance of bond 4. Date of meturity of bond (b) The Insurer is liable for the payment of Date of issuence of bond
 Date of maturity of bond amounts within any deductible applicable to 5. Tangible net worth "7. Tangible net worth (if any portion of the closure or post-closure cost est-mates is included in "total liabilities" *6. Total assets in U.S. frequired only less than 90% of assets are located the policy, with a right of reimbursement by the insured for any such payment made by matte is included or more managed on your financial statements you may add that portion to this line) 8 Total assets in the U.S. (required only 8 less than 50% of assets are located the Insurer. This provision does not apply with respect to that amount of any deductible 7. Is line 5 at least \$10 million? 8. Is line 5 at least 6 times line 17 for which coverage is demonstrated as *9. Are at least 90% of assets located in the U.S.? If not, complete line 10. 10. Is line 6 at least 6 times line 1? specified in 40 CFR 264.147(f) or 285.147(f). in the U.S.) (c) Whenever requested by a Regional Administrator of the U.S. Environmental 9. Is line 7 at least \$10 million? 10. Is fine 7 at least 6 times line 3?

11. Are at least 90% of assets located in the U.S.? If not, complete line 12

12. Is line 8 at least 6 times line 3? Protection Agency (EPA), the Insurer agrees [Fill in part B if you are using the financial to furnish to the Regional Administrator a test to demonstrate assurance of both signed duplicate original of the policy and all liability coverage and closure or post-closure endorsements. care.] I hereby certify that the wording of this (d) Cancellation of this endorsement, letter is identical to the wording specified in whether by the Insurer or the insured, will be Part B. Closure or Post-Closure Care and 40 CFR 284.151(g) as such regulations were effective only upon written notice and only Liability Coverage constituted on the date shown immediately after the expiration of sixty (50) days after a [Fill in Alternative I if the criteria of copy of such written notice is received by the paragraphs (f)(1)(i) of §§ 284.143 or 284.145 Regional Administrator(s) of the EPA [Signature] and (f)(1)(i) of \$ 264.147 are used or if the Region(s) in which the facility(ies) is (are) [Name] criteria of paragraphs (e)(1)(i) of §§ 285.143 or located. [Title] 285.145 and (f)(1)(i) of \$ 285.147 are used. Pill (e) Any other termination of this in Alternative II if the criteria of paragraphs (Date) endorsement will be effective only upon written notice and only after the expiration of (f)(1)(ii) of \$4 284.143 or 284.145 and (f)(1)(ii) thirty (30) days after a copy of such written of § 284.147 are used or if the criteria of (i) A hazardous waste facility liability notice is received by the Regional paragraphs (e)(1)(ii) of §§ 285.143 or 285.145 Administrator(s) of the EPA-Region(s) in endorsement as required in §§ 284.147 and (f)(1)(ii) of \$ 285.147 are used.) which the facility(ies) is (are) located. or 265.147 must be worded as follows. Attached to and forming part of policy No.
issued by [name of Insurer], herein except that instructions in brackets are ALTERNATIVE ! to be replaced with the relevant called the Insurer, of [address of Insurer] to Sum of current closure and post-clo information and the brackets deleted: sure cost estimates (total of all cost estimates listed abdve) [name of insured] of [address] this — day of ______, 19—. The effective date of said policy Hazardous Waste Facility Liability E. Amount of annual agg day of --, 19-Sum of lines 1 and 2

4. Total liabilities (if any portion closure or post-closure soct a is included in your total liabilities of portion from I hereby certify that the wording of this 1. This endorsement certifies that the endorsement is identical to the wording policy to which the endorsement is attached specified in 40 CFR 264.151(i) as such provides liability insurance covering bodily regulation was constituted on the date first

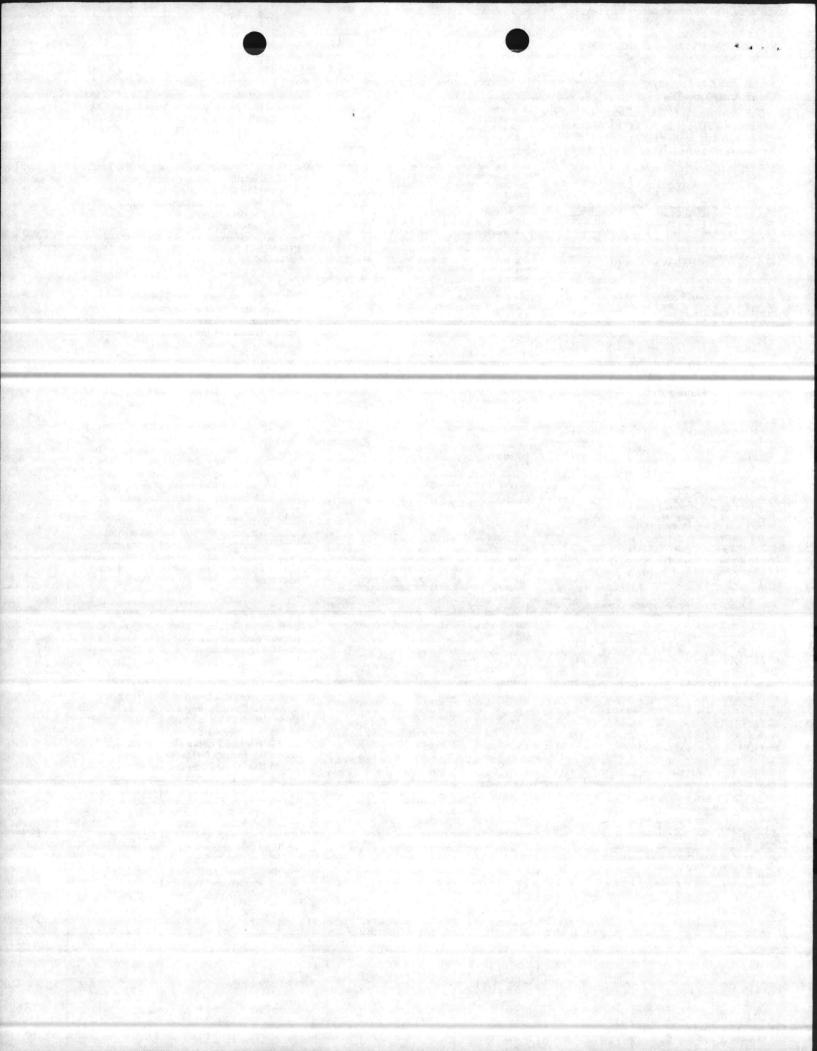
injury and property damage in connection

. . .

atti content the promotion, as a date? I want to be at a medici

.....

above written, and that the Insurer is



licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States. 1 William

Signature of Authorized Representative of Insurer .. -- - 3,; *

[Type name] [Title], Authorized Representive of [name of Insurer

[Address of Representative]

(i) A certificate of liability insurance as required in §§ 264.147 or 265.147 must be worded as follows, except that the instructions in brackets are to be replaced with the relevant information and the brackets deleted:

Hazardous Wasta Facility Certificate of Liability Insurance

1. [Name of insurer], (the "insurer"), of [address of Insurer] hereby certifies that it has issued liability insurance covering bodily injury and property damage to [name of insured), (the "insured"), of [address of insured in connection with the insured's obligation to demonstrate financialresponsibility under 40 CFR 284.147 or 265.147. The coverage applies at [list EPA Identification Number, name, and address for each facility) for [insert "sudden accidental occurrences," "nonsudden accidental occurrences," or "sudden and nonsudden accidental occurrences"; if coverage is for multiple facilities and the coverage is

different for different facilities, indicate which facilities are insured for sudden accidental occurrences, which are insured for nonsudden accidental occurrences, and which are insured for both]. The limits of liability are [insert the dollar amount of the "each occurrence" and "annual aggregate" limits of the Insurer's liability), exclusive of legal defense costs. The coverage is provided under policy number -, issued on [date]. The effective date of said policy is [date].

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations

under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 284.147(f) or 285.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all

endorsements.

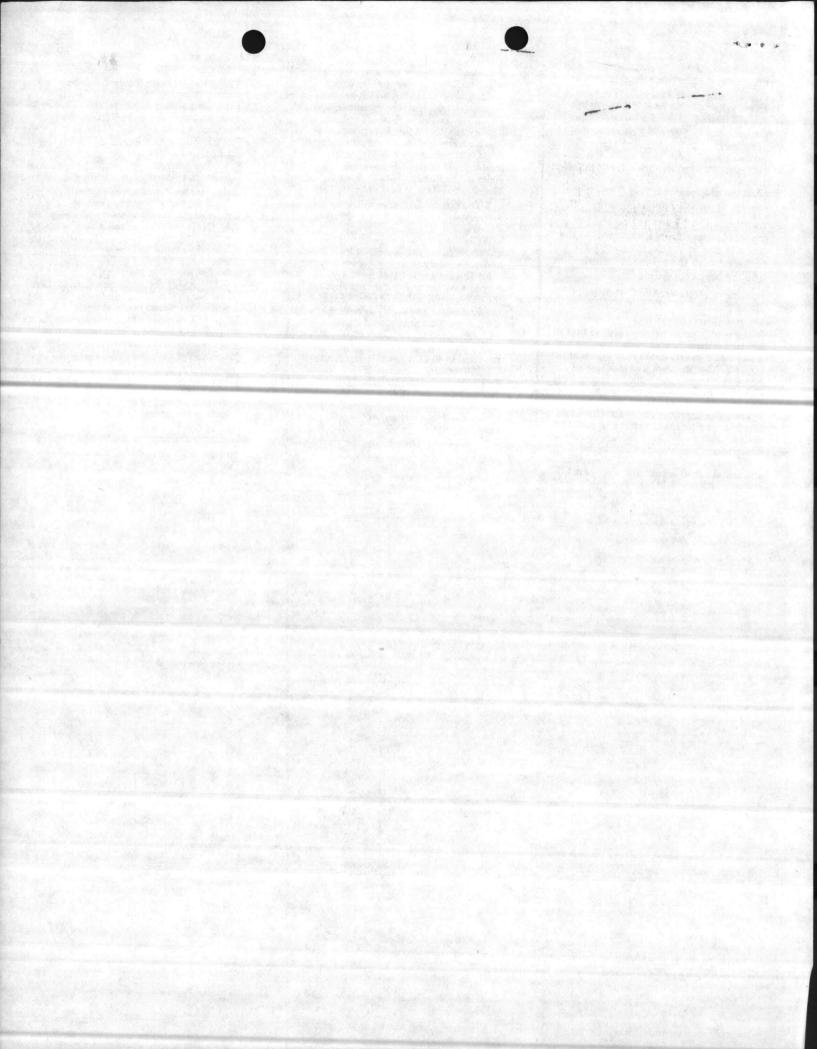
(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon writtemnotice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 284.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

[Signature of authorized representative of Insurer Type name) [Title], Authorized Representative of [name of Insurer]

[Address of Representative]



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DDS RTS

OFFICE OF THE STAFF JUDGE ADVOCATE
Marine Corps Base
Camp Lejeune, North Carolina 28542

SJA/LLS/ero 5800/200-82 28 Sep 1982

FIRST ENDORSEMENT on BMO 1tr MAIN/JIW/th 6240 of 21 Sep 1982

From: Staff Judge Advocate
To: Base Maintenance Officer

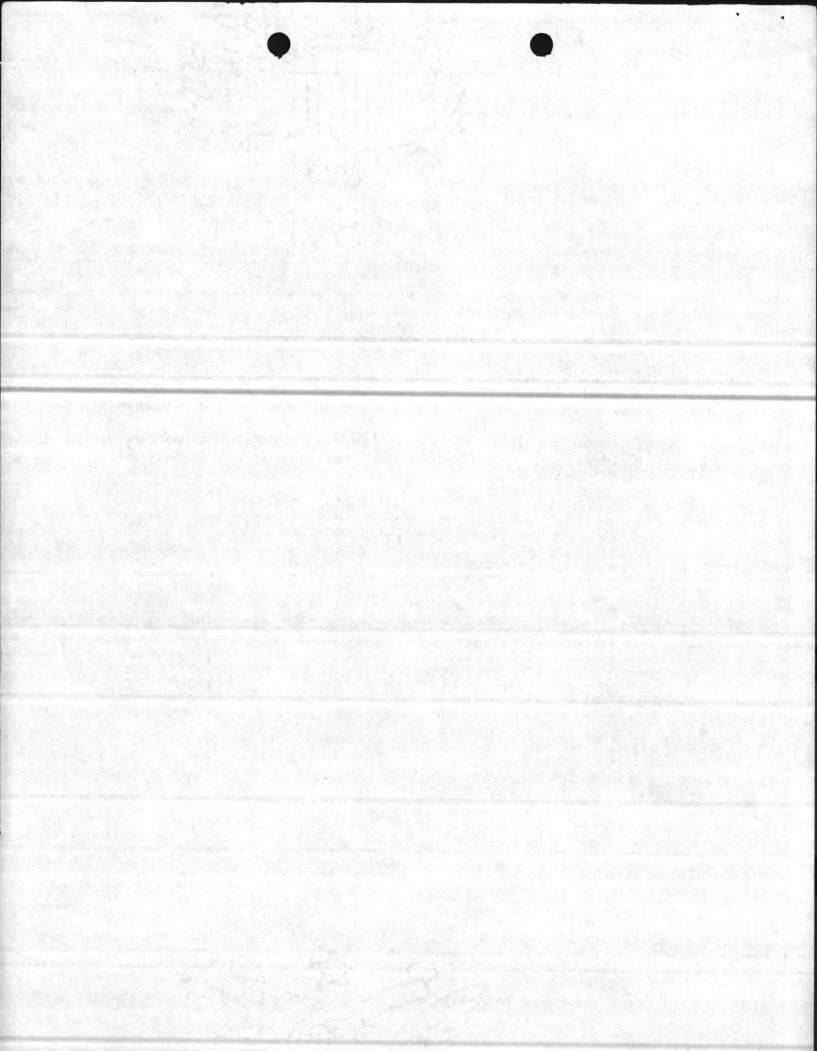
Subj: Hazardous Waste Regulations

Ref: (a) 40 CFR § 265.140

1. Returned.

2. Subparagraph (c) of reference (a) specifically exempts States and the Federal Government from the financial requirements of hazardous waste facilities owners and operators.

W. L. MAXEY



SLP SLP

BASE MAINTENANCE DIVISION

Marine Corps Base Camp Lejeune, North Carolina 28542

> MAIN/JIW/th 6240 SEP **2 1** 1982

From: Base Maintenance Officer
To: Staff Judge Advocate

Subj: Hazardous Waste Regulations

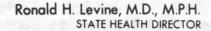
Encl: (1) Div of Health Ser ltr of 1 Sep 1982

1. Natural Resources and Environmental Affairs personnel have discussed the enclosure with Mr. Emil Breckling, North Carolina Solid and Hazardous Waste Branch. He advised that Camp Lejeune, as a federal facility, was exempt from the requirements. However, it is requested your office review the enclosure and provide an opinion.

2. Point of contact is Mr. Danny Sharpe, Natural Resources and Environmental Affairs Branch, extension 1690.

R. F. CALTA

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

September 1, 1982

TO:

Owners and Operators

Hazardous Waste Treatment, Storage

or Disposal Facilities in North Carolina

FROM:

Glenn Dunn, Attorney

Solid & Hazardous Waste Management Branch

SUBJECT:

Financial Requirements for TSDF's - Changed Deadlines and

Other Clarifications

On July 7, 1982, a notification was mailed from the North Carolina Solid and Hazardous Waste Management Branch to all owners and operators of hazardous waste treatment, storage, and disposal facilities in North Carolina. That memorandum, a copy of which is attached, explained that North Carolina would probably adopt verbatim the Federal financial responsibility regulations as set forth in 40 CFR, Part 264 Subpart H and 40 CFR Part 265 Subpart H, as adopted on May 19, 1980 and amended on April 7 and April 16, 1982. That memorandum also set forth the dates on which compliance with the financial assurance and liability coverage regulations will be enforced (see the July 7 memorandum).

Since the memorandum was sent, the Federal rules have been adopted verbatim in North Carolina as anticipated. Also, in the interim, two well-attended conferences were held in Raleigh and Hickory for the purpose of clarifying the financial requirements regulations to the industries and institutions that must comply with them. It was apparent from the discussions at the conferences that the financial requirements were not completely understood and, consequently, most facilities are just beginning to make arrangements to comply with them. There were certain key points that caused most of the confusion, and it is the purpose of this follow-up memorandum to clarify those points and to further explain the schedule for compliance in North Carolina.

-- North Carolina is authorized to implement the entire RCRA regulatory program within the State. Therefore, the financial regulations are administered by the Solid and Hazardous Waste Management Branch of the North Carolina Department of Human Resources, not the EPA. All questions, communications, and required documents should be submitted to the Solid and Hazardous Waste Management Branch, P.O. Box 2091, Raleigh, North Carolina 27602, should indicate that it relates to financial requirements, and should be to the Attention of Glenn Dunn.

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-- It is essential to determine accurately what type of financial requirements your facility must meet. There are four separate purposes for the financial requirements: assurance for closure costs, assurance for post-closure costs, sudden liability coverage, and non-sudden liability coverage. All TSDF's must provide some form of assurance for closure and non-sudden liability coverage, unless the facility is exempted explicitly by the regulations. Only landfills, surface impoundments, and land treatment facilities (i.e. facilities that are subject to post-closure measures) must provide post-closure cost assurances and non-sudden liability coverage. -- The deadline for compliance by TSDF's in North Carolina with the financial assurances for closure and post-closure has been changed from October 1, 1982 to November 1, 1982. The reason for this change is that it has become apparent that many owners and operators are just beginning to understand the alternative mechanisms available to them and the nature of the documentation that is required for each mechanism. This is a

-The deadline for compliance by TSDF's in North Carolina with the financial assurances for closure and post-closure has been changed from October 1, 1982 to November 1, 1982. The reason for this change is that it has become apparent that many owners and operators are just beginning to understand the alternative mechanisms available to them and the nature of the documentation that is required for each mechanism. This is a particularly acute problem because the regulations require that certain documents be submitted for each mechanism and that the documents contain the exact wording specified in the regulations. The description of the required documents and the wording for each is set out in the April 7 Federal Register (for closure and post-closure assurances) and the April 16 Federal Register (for liability coverage). The requirements for closure and post-closure assurances are more clearly described in an excellent Guidance Manual prepared recently for the EPA. However, due to the complexity of these regulations and the fact that the Guidance Manual has only recently become available, it is apparent that many TSDF's will not be ready to submit the correct documents by October 1, 1982.

In order to ensure that every TSDF in North Carolina has the correct model documents to use, every TSDF must notify this Branch before October 1, 1982 of the mechanism or combination of mechanisms chosen to assure closure and post-closure care. This Branch will then provide each facility with copies of the appropriate documents and instructions. By doing this, it is our hope that most facilities will provide adequate documents the first time (i.e. by November 1, 1982) and thus this Branch and facility owners and operators will spend a minimal amount of time returning and re-executing the documents.

It is not our intent to prohibit TSDF's from obtaining copies of the Guidance Manual or the regulations, and proceeding ahead of the above-outlined schedule. However, if you choose to do so, you are strongly urged to obtain the Guidance Manual and strictly follow the instructions and documents in it so that you will be absolutely sure to execute and submit every required document worded precisely as specified. Copies of the Guidance Manual may be obtained from: 1CF, Inc. 1850 K Street, N.W., Suite 950, Washington, D.C. 20006.

--The date for compliance with financial requirements for sudden liability coverage remains October 1, 1982. The mechanisms that can be used to meet this requirement are limited to liability insurance, the financial test or a combination of the two. Most facilities already have some form of liability insurance, therefore, compliance should be much simpler than for closure and post-closure care and the October deadline is reasonable. However, the documents must be worded precisely as required by the regulations. A manual with model documents will be ready very soon and can be ordered from the same address as the financial assurances manual.

Those TSDF's that choose to use the financial test for closure (and post-closure, if applicable) assurances and for liability coverage please note that a single set of documents will suffice for this purpose. Those documents should be submitted to this Branch by October 1, and the extension to November 1 of the closure/post-closure assurance deadline will not apply to you.

Again let me urge those of you that follow this approach the April 16 Federal Register or, preferably the Guidance Manual to obtain and carefully follow the instructions and wording for documents provided in those publications. I am enclosing a copy of the pertinent pages of the April 16 Federal Register to be sure that you have it available.

- --In filling out all required documents, the words "North Carolina Department of Human Resources" must be substituted for the words "Administrator", Regional Administrator" or "Director". Each of the latter terms refers to a position in the EPA, but the EPA is not a party or beneficiary to any of these agreements concerning TSDF's in North Carolina and the Department of Human Resources, the administering agency in North Carolina, must therefore be substituted.
- --Facilities that are considering using the trust fund mechanism for closure or post-closure assurance should consider that final RCRA permits will have a five year duration and the fund will therefore be required to equal the closure cost estimate (or post-closure cost estimate, where applicable) within five years from issuance of the permit. This five year period is called the "pay-in" period. Thus, each payment into the fund must be equal to approximately onefifth of the estimated closure or post-closure cost (not taking into consideration such factors as the interest the fund might earn or the costs of administration). This five-year duration will not become applicable until the facility converts from Part A Interim Status to a Part B permit, and until that time the interim status formula for the pay-in period will apply, i.e. 20 years beginning with the effective date of the regulations or the remaining operating period of the facility as estimated in the closure plan, whichever is shorter. However, North Carolina will soon begin Part B permitting so facilities using the trust fund mechanism will soon be required to convert to the five year pay-in period.

There seems to be some confusion under the financial test concerning the meaning of the four paragraphs in the Chief Financial Officer's statement that categorize the TSDF's that the Party submitting the financial test is responsible for. It may help in understanding these categories to remember that the last paragraph refers to facilities in States where the EPA has delegated the RCRA program to the host State, but that State has not yet established rules concerning financial responsibility. Also remember that the total of the number of TSDF's in each paragraph should equal the total number of TSDF's that the Party submitting the financial test is assuring by means of the financial test.

Finally, in closing this memorandum, it is unfortunately necessary to ask that those TSDF's in North Carolina that have already submitted financial assurances review the documents submitted against the regulations or Guidance Manual and prepare a new set of assurances accordingly. This Branch has received approximately 55 sets of assurances and a quick review shows that nearly all lack some required documents and/or have incorrectly executed documents. If you wish us to return the documents that have already been submitted, please inform us and we will do so. If after reviewing your submission, you conclude it is correct and complete as submitted, please inform us to that effect.

Also, I want to urge whomever receives this memorandum to get it into the hands of the person responsible for financial requirements as quickly as possible (if you are not that person) because of the impending deadlines. If you have questions or otherwise wish to discuss financial requirements, please contact me.





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

July 7, 1982

TO: Owners and Operators
Hazardous Waste Treatment, Storage
or Disposal Facilities in North Carolina

On November 19, 1980, the State of North Carolina adopted its Hazardous Waste Management Rules. These rules adopt by reference the Federal regulations dealing with financial requirements for all hazardous waste treatment, storage, and disposal facilities. More specifically, 10 NCAC 10F .0032(g) adopts the final financial requirements for facilities set forth in 40 CFR, Part 264, Subpart H, and 10 NCAC 10F .0033(h) adopts the interim financial requirements set forth in 40 CFR, Part 265, Subpart H. North Carolina's rules require that hazardous waste facilities have financial assurance for closure (and post-closure if a disposal facility). Four mechanisms are available to facility owners for accomplishing this task. These are: (1) Trust Fund; (2) Surety Bond guaranteeing payment into a trust fund; and (3) Letter of Credit; and (4) other methods that provided an equivalent degree of protection concerning human health and the environment as mechanisms 1, 2, and 3.

The Federal regulations adopted by North Carolina also require that all hazardous waste treatment, storage and disposal facilities operating in the State be covered by liability insurance for sudden (accidental) occurrences, and that all hazardous waste surface impoundments, landfills, or land treatment facilities have liability insurance covering non-sudden occurrences.

The <u>Federal</u> financial responsibility regulations, Subpart H, have been revised since they were originally adopted in North Carolina. These revisions, published in the Federal Registers on April 7 and April 16, 1982, accomplished two things. They expanded the financial assurance and liability insurance mechanisms available to facility owners and set new Federal compliance dates.

It is anticipated that the above revisions in the Federal rules, except for compliance dates, will be adopted in North Carolina in August. Until that time, the existing North Carolina Rules for Hazardous Waste Management continue in effect. These existing rules have been strictly enforced concerning required cost estimates for closure and post-closure. When the Federal revisions have been adopted in North Carolina, the Solid and Hazardous Waste Management Branch intends to enforce compliance with the Subpart H, Financial Requirement Rules, beginning on the following dates:

Financial assurance for closure and post-closure care plans		Permitted Status & New Facilities	Interim Status & Existing Facilities October 1, 1982		
		At least 60 days before the first receipt of hazardous waste			
	Liability coverage for sudden accidental occurrences	At least 60 days before the first receipt of hazardous waste	October 1, 1982		
	Liability coverage for non-sudden accidental occurrences	At least 60 days before the first receipt of hazardous waste	Annual Sales or Revenues over \$10 mil. Jan. 16, 1983 \$5-\$10 mil. Jan. 16, 1984 others Jan. 16, 1985		

The new additional Federal mechanisms for achieving financial assurance as published in the Federal Register on April 7 and April 16, 1982 are likely to be adopted as written in North Carolina, and should therefore provide accurate guidance in your preparations for providing financial assurance by the above dates. Please contact this office at (919) 733-2178 if you have any questions regarding your responsibilities in complying with these requirements.

Sincerely,

0. W. Strickland, Head

Solid & Hazardous Waste Management Branch

Environmental Health Section

OWS:nlc

Attachment

NOTE: THE RULES DEFINES LIABILITY COVERAGE REQUEMENTS ARE ON PAGES 1-3, AND THE WORDING FOR THE INSTRUMENTS IS ON PAGES 3-5.

PART 265—INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES

Subpart H-Financial Requirements

a. Section 265.141 is revised to read as follows:

§ 265.141 Definitions of terms as used in this subpart.

(f) The following terms are used in the specifications for the financial tests for closure, post-closure care, and liability coverage. The definitions are intended to assist in the understanding of these regulations and are not intended to limit the meanings of terms in a way that conflicts with generally accepted accounting practices.

"Assets" means all existing and all probable future economic benefits obtained or controlled by a particular

entity

"Current assets" means cash or other assets or resources commonly identified as those which are reasonably expected to be realized in cash or sold or consumed during the normal operating cycle of the business.

"Current liabilities" means obligations whose liquidation is reasonably expected to require the use of existing resources properly classifiable as current assets or the creation of other current liabilities.

"Independently audited' refers to an audit performed by an independent certified public accountant in accordance with generally accepted

auditing standards.

"Liabilities" means probable future sacrifices of economic benefits arising from present obligations to transfer assets or provide services to other entities in the future as a result of past transactions or events.

"Net working capital" means current assets minus current liabilities.

"Net worth" means total assets minus total liabilities and is equivalent toowner's equity.

"Tangible net worth" means the tangible assets that remain after deducting liabilities; such assets would not include intangibles such as goodwill and rights to patents or royalties.

(g) In the liability insurance requirements the terms "bodily injury" and "property damage" shall have the meanings given these terms by applicable State law. However, these terms do not include those liabilities which, consistent with standard industry practice, are excluded from coverage in liability policies for bodily injury and property damage. The

Agency intends the meanings of other terms used in the liability insurance requirements to be consistent with their common meanings within the insurance industry. The definitions given below of several of the terms are intended to assist in the understanding of these regulations and are not intended to limit their meanings in a way that conflicts with general insurance industry usage.

"Accidental occurrence" means an accident, including continuous or repeated exposure to conditions, which results in bodily injury or property damage neither expected nor intended from the standpoint of the insured.

"Legal defense costs" means any expenses that an insurer incurs in defending against claims of third parties brought under the terms and conditions of an insurance policy.

"Nonsudden accidental occurrence" means an occurrence which takes place over time and involves continuous or

repeated exposure.

"Sudden accidental occurrence" means an occurrence which is not continuous or repeated in nature.

§ 265.147 Liability requirements.

(a) Coverage for sudden accidental occurrences. By the effective date of these regulations, an owner or operator of a hazardous waste treatment, storage, or disposal facility, or a group of such facilities, must demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility or group of facilities. The owner or operator must have and maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs. This liability coverage may be demonstrated in one of three ways, as specified in paragraphs (a)(1), (a)(2), and (a)(3) of this section:

(1) An owner or operator may demonstrate the required liability coverage by having liability insurance as specified in this paragraph.

(i) Each insurance policy must be amended by attachment of the Hazardous Waste Facility Liability Endorsement or evidenced by a Certificate of Liability Insurance. The wording of the endorsement must be identical to the wording specified in § 264.151(i). The wording of the certificate of insurance must be identical to the wording specified in § 264.151(j). The owner or operator must submit a signed duplicate original of the endorsement or the certificate of

insurance to the Regional Administrator, or Regional Administrator if the facilities are located in more than one Region. If requested by a Regional Administrator, the owner or operator must provide a signed duplicate original of the insurance policy.

(ii) Each insurance policy must be issued by an insurer which, at a minimum, is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more

States.

(2) An owner or operator may meet the requirements of this section by passing a financial test for liability coverage as specified in paragraph (f) of this section.

(3) An owner or operator may demonstrate the required liability coverage through use of both the financial test and insurance as these mechanisms are specified in this section. The amounts of coverage demonstrated must total at least the minimum amounts required by this

paragraph.

(b) Coverage for nonsudden accidental occurrences. An owner or operator of a surface impoundment, landfill, or land treatment facility which is used to manage hazardous waste, or a group of such facilities, must demonstrate financial responsibility for bodily damage and property damage to third parties caused by nonsudden accidental occurrences arising from operations of the facility or group of facilities. The owner or operator must have and maintain liability coverage for nonsudden accidental occurrences in the amount of at least \$3 million per occurrence with an annual aggregate of at least \$6 million, exclusive of legal defense costs. This liability coverage may be demonstrated in one of three ways, as specified in paragraphs (b)(1), (b)(2), and (b)(3) of this section:

(1) An owner or operator may demonstrate the required liability coverage by having liability insurance

as specified in this paragraph.

(i) Each insurance policy must be amended by attachment of the Hazardous Waste Facility Liability Endorsement or evidenced by a Certificate of Liability Insurance. The wording of the endorsement must be identical to the wording specified in § 264.151(i). The wording of the certificate of insurance must be identical to the wording specified in § 264.151(j). The owner or operator must submit a signed duplicate original of the endorsement or the certificate of insurance to the Regional Administrator, or Regional Administrators if the

i facilities are located in more than one

Region. If requested by a Regional Administrator, the owner or operator must provide a signed duplicate original

of the insurance policy.

(ii) Each insurance policy must be issued by an insurer which, at a minimum, is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

(2) An owner or operator may meet the requirements of this section by passing a financial test for liability coverage as specified in paragraph (f) of

this section.

(3) An owner or operator may demonstrate the required liability coverage through use of both the financial test and insurance as these mechanisms are specified in this section. The amounts of coverage must total at least the minimum amounts required by this paragraph.

(4) The required liability coverage for nonsudden accidental occurrences must be demonstrated by the dates listed below. The total sales or revenues of the owner or operator in all lines of business, in the fiscal year preceding the effective date of these regulations, will determine which of the dates applies. If the owner and operator of a facility are two different parties, or if there is more than one owner or operator, the sales or revenues of the owner or operator with the largest sales or revenues will determine the date by which the coverage must be demonstrated. The dates are as follows:

(i) For an owner or operator with sales or revenues totalling \$10 million or more, 6 months after the effective date

of these regulations.

(ii) For an owner or operator with sales or revenues greater than \$5 million but less than \$10 million, 18 months after the effective date of these regulations.

(iii) All other owners or operators, 30 months after the effective date of these

regulations.

(5) By the date 6 months after the effective date of these regulations an owner or operator who is within either of the last two categories (paragraphs (b)(4)(ii) or (b)(4)(iii) of this section) must, unless he has demonstrated liability coverage for nonsudden accidental occurrences, send a letter to the Regional Administrator stating the date by which he plans to establish such

(c) Request for variance. If an owner or operator can demonstrate to the satisfaction of the Regional Administrator that the levels of financial responsibility required by paragraphs (a) or (b) of this section are not consistent with the degree and duration of risk associated with treatment, storage, or disposal at the facility or group of facilities, the owner or operator may obtain a variance from the Regional Administrator. The request for a variance must be submitted in writing to the Regional Administrator. If grant

ne variance will take the form of an adjusted level of required liability coverage, such level to be based on the Regional Administrator's assessment of the degree and duration of risk associated with the ownership or operation of the facility or group of facilities. The Regional Administrator may require an owner or operator who requests a variance to provide such technical and engineering information as is deemed necessary by the Regional Administrator to determine a level of financial responsibility other than that required by paragraphs (a) or (b) of this section. The Regional Administrator will process a variance request as if it were a permit modification request under § 122.15(a)(7)(iii) of this Chapter and subject to the procedures of § 124.5 of this Chapter. Notwithstanding any other provision, the Regional Administrator may hold a public hearing at his discretion or whenever he finds, on the basis of requests for a public hearing, a significant degree of pubic interest in a tentative decision to grant a variance.

(d) Adjustments by the Regional Administrator. If the Regional Administrator determines that the levels of financial responsibility required by paragraphs (a) or (b) of this section are not consistent with the degree and duration of risk associated with treatment, storage, or disposal at the facility or group of facilities, the Regional Administrator may adjust the level of financial responsibility required under paragraphs (a) or (b) of this section as may be necessary to protect human health and the environment. This adjusted level will be based on the Regional Administrator's assessment of the degree and duration of risk associated with the ownership or operation of the facility or group of facilities. In addition, if the Regional Administrator determines that there is a significant risk to human health and the environment from nonsudden accidental occurrences resulting from the operations of a facility that is not a surface impoundment, landfill, or land treatment facility, he may require that an owner or operator of the facility comply with paragraph (b) of this section. An owner or operator must furnish to the Regional Administrator, within a reasonable time, any information which the Regional Administrator requests to determine whether cause exists for such adjustments of level or type of coverage. The Regional Administrator will process an adjustment of the level of required coverage as if it were a permit modification under § 122.15(a)(7)(iii) of this Chapter and subject to the procedures of § 124.5 of this Chapter. Notwithstanding any other provision, the Regional Administrator may hold a public hearing at his discretion or whenever he finds, on the basis of requests for a public hearing, a significant degree of public interest in a tentative decision to adjust the level or

type of required coverage.

e) Period of coverage. An owner or operator must continuously provide liability coverage for a facility as required by this section until certifications of closure of the facility, as specified in § 265.115, are received by the Regional Administrator.

(f) Financial test for liability coverage. (1) An owner or operator may satisfy the requirements of this section by demonstrating that he passes a financial test as specified in this paragraph. To pass this test the owner or operator must meet the criteria of paragraph (f)(1)(i) or (f)(1)(ii):

(i) The owner or operator must have: (A) Net working capital and tangible net worth each at least six times the amount of liability coverage to be demonstrated by this test; and

(B) Tangible net worth of at least \$10

million; and

(C) Assets in the United States amounting to either: (1) At least 90 percent of his total assets; or (2) at least six times the amount of liability coverage to be demonstrated by this

(ii) The owner or operator must have:

(A) A current rating for his most recent bond issuance of AAA, AA, A, or BBB as issued by Standard and Poor's, . or Aaa, Aa, A, or Baa as issued by Moody's; and

(B) Tangible net worth of at least \$10

million: and

(C) Tangible net worth at least six times the amount of liability coverage to be demonstrated by this test; and

(D) Assets in the United States amounting to either: (1) at least 90 percent of his total assets; or (2) at least six times the amount of liability coverage to be demonstrated by this

(2) The phrase "amount of liability coverage" as used in paragraph (f)(1) of this section refers to the annual aggregate amounts for which coverage is required under paragraphs (a) and (b) of

(3) To demonstrate that he meets this test, the owner or operator must submit the following three items to the Regional

Administrator:

(i) A letter signed by the owner's or operator's chief financial officer and worded as specified in § 264.151(g). If an owner or operator is using the financial test to demonstrate both assurance for closure or post-closure care, as specified by §§ 264.143(f), 264.145(f), 265.143(e). and 265.145(e), and liability coverage, he must submit the letter specified in § 264.151(g) to cover both forms of financial responsibility; a separate letter as specified in § 264.151(f) is not required.

(ii) A copy of the independent certified public accountant's report on examination of the owner's or operator's financial statements for the latest

completed fiscal year.

(iii) A special report from the owner's or operator's independent certified public accountant to the owner or operator stating that:

(A) He has compared the data which the letter from the chief financial officer specifies as having been derived from . the independently audited, year-end financial statements for the latest fiscal year with the amounts in such financial statements: and

(B) In connection with that procedure, no matters came to his attention which caused him to believe that the specified

data should be adjusted.

(4) The owner or operator may obtain a one-time extension of the time allowed for submission of the documents specified in paragraph (f)(3) of this section if the fiscal year of the owner or operator ends during the 90 days prior to the effective date of these regulations and if the year-end financial statements for that fiscal year will be audited by an independent certified public accountant. The extension will end no later than 90 days after the end of the owner's or operator's fiscal year. To obtain the extension, the owner's or operator's chief financial officer must send, by the effective date of these regulations, a letter to the Regional Administrator of each Region in which the owner's or operator's facilities to be covered by the financial test are located. This letterfrom the chief financial officer must:

(1) Kequest the extension;

(ii) Certify that he has grounds to believe that the owner or operator meets the criteria of the financial test;

(iii) Specify for each facility to be covered by the test the EPA Identification Number, name, address, the amount of liability coverage and, when applicable, current closure and post-closure cost estimates to be covered by the test:

(iv) Specify the date ending the owner's or operator's last complete fiscal year before the effective date of

these regulations:

(v) Specify the date, no later than 90 days after the end of such fiscal year, when he will submit the documents specified in paragraph (f)(3) of this section; and

(vi) Certify that the year-end financial statements of the owner or operator for such fiscal year will be audited by an independent certified public accountant.

(5) After the initial submission of items specified in paragraph (f)(3) of this section, the owner or operator must send updated information to the Regional Administrator within 90 days after the close of each succeeding fiscal year. This information must consist of all three items specified in paragraph (f)(3) of this section.

(b) if the owner or operator no longer meets the requirements of paragraph (f)(1) of this section, he must obtain insurance for the entire amount of required liability coverage as specified in this section. Evidence of insurance must be submitted to the Regional Administrator within 90 days after the end of the fiscal year for which the yearend financial data show that the owner or operator no longer meets the test requirements.

(7) The Regional Administrator may disallow use of this test on the basis of qualifications in the opinion expressed by the independent certified public accountant in his report on examination of the owner's or operator's financial statements (see paragraph (f)(3)(ii) of this section). An adverse opinion or a disclaimer of opinion will be cause for disallowance. The Regional Administrator will evaluate other qualifications on an individual basis. The owner or operator must provide evidence of insurance for the entire amount of required liability coverage as specified in this section within 30 days after notification of disallowance.

§ 264.151 Wording of the instruments.

(g) A letter from the chief financial officer, as specified in § \$ 264.147(f) or 265.147(f) of this chapter, must be worded as follows, except that instructions in brackets are to be replaced with the relevant information and the brackets deleted:

Letter from Chief Financial Officer (to . demonstrate liability coverage or to demonstrate both liability coverage and

assurance of closure or post-closure care).
[Address to Regional Administrator of every Region in which facilities for which financial responsibility is to be demonstrated through the financial test are located.]

I am the chief financial officer of [owner's er operator's name and address]. This letter is in support of the use of the financial test to is in support of the use of the financial test to demonstrate financial responsibility for liability coverage [insert "and closure and/or post-closure care" if applicable] as specified in Subpart H of 40 CFR Parts 284 and 265. [Fill out the following paragraph regarding facilities and liability coverage. For each facility, include its EPA Identification. Number, name, and address.]

Number, name, and address.]
The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is b demonstrated through the financial use

specified in Subpart H of 40 CFR Parts 264

[If you are using the financial test to demonstrate coverage of both liability and closure and post-closure care, fill in the following four paragraphs regarding facilities and associated closure and post-closure cost estimates. If there are no facilities that belong in a particular paragraph, write "None" in the space indicated. For each facility, include its EPA Identification Number, same, address, and current closure and/or post-closure cost estimates. Identify each cost estimate as to whether it is for closure or post-closure care.]

1. The owner or operator identified above owns or operates the following facilities for which financial assurance for closure or postclosure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 284 and 285. The current ofcourse and/or post-closure cost estimates covered by the test are shown for each facility:

2. The owner or operator identified above guarantees, through the corporate guarantee specified in Subpart H of 40 CPR Parts 284 and 205, the closure and post-elecure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

3. in States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this owner or operator is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent To or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 8:385 and 285. The current closure and/or post-Sesure cost estimates covered by such a test e shown for each facility:

4. The owner or operator identified above ms or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 284 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

This owner or operator [insert "is required" or "is not required"] to file a Form 10K with the Securities and Exchange Commission

(SEC) for the latest fiscal year.

The fiscal year of this owner or operator ends on [month, day]. The figures for the following items marked with an asterisk are derived from this owner's or operator's independently audited, year-end financial 3" statements for the latest completed fiscal year, ended [date].

[Fill in part A if you are using the financial test to demenstrate coverage only for the

liability requirements.]

Part A. Liability Coverage for Accidental Occurrences

[Fill in Alternative I if the criteria of paragraph (f)(1)(i) of §§ 284.147 or 285.147 are used. Fill in Alternative II if the criteria of paragraph (f)(1)(ii) of §§ 284.147 or 285.147 are used.]

ALTERNATIVE I

1. Amount of annual aggregate its

*2. Current assets *3. Current liabilities 4. Net working capital (line 2 minus line 3) *5. Tangible net worth *6. If less than 90% of assets are located in the U.S., give total U.S. assets	VES	NO
7, is line 5 at least \$10 million? 8. is line 4 at least 5 times line 1? 9. is line 5 at least 5 times line 1? *10. Are at least 90% of assets located	=	=
In the U.S.? If not, complete line 11. 11. Is line 6 at least 6 times line 1?	Ξ	=
ALTERNATIVE II		
Amount of annual aggregate liability coverage to be demonstrated Current bond rating of most recent		
issuance and name of rating service	-	-
3. Date of issuance of bond	. \$	
4. Date of maturity of bond	\$	
*5. Tangible net worth	-	
*6. Total assets in U.S. (required only if less than 90% of assets are located in		
the U.S.)		
	YES	MO
7. Is line 5 at least \$10 million?		
6. Is line 5 at least 6 times line 1?		
*9. Are at least 90% of assets located in		
the U.S.? If not, complete line 10.	-	-
10. Is line 6 at least 6 times line 1?		-
mill to a mile of the		

[Fill in part B if you are using the financial test to demonstrate assurance of both liability coverage and closure or post-closure care.]

Part B. Closure or Post-Closure Care and Liability Coverage

[Fill in Alternative I if the criteria of paragraphs (f)(1)(i) of §§ 204.143 or 204.145 and (f)(1)(i) of § 204.147 are used or if the criteria of paragraphs (e)(1)(i) of §§ 205.143 or 205.145 and (f)(1)(i) of § 205.147 are used. Fill in Alternative II if the criteria of paragraphs (f)(1)(ii) of §§ 204.143 or 204.145 and (f)(1)(ii) of § 204.147 are used or if the criteria of paragraphs (e)(1)(ii) of §§ 205.143 or 205.145 and (f)(1)(ii) of § 205.147 are used.]

ALTERNATIVE !

1.	Sum	of	ourrent	clos	ure a	nd	pos	t-clo-
	syre	008	t estima	ates	(total	of	all	cost
	estim	retes	listed a	abdle	9)			

- Amount of annual aggregate liability coverage to be demonstrated
- *4. Total liabilities (if any portion of your closure or post-closure sost estimates is included in your sotal liabilities, you may deduct that portion from this time and add that amount to lines 5 and 6)

ALTERNATIVE I-Continued

*7. Current assets	9-	_
*8. Current tiabilities	-	
9. Net working capital (line 7 minus line		
8)	-	
*10. The sum of net income plus depreci-		
ation, depletion, and amortization		-
*11. Total assets in U.S. (required only if		
less than 90% of assets are located in		
the U.S.)	-	
	YES	NO
12. Is line 5 at least \$10 million?	-	-
13. is line 5 at least 6 times line 3?	-	
14. Is line 9 at least 6 times line 3?		-
*15. Are at least 90% of assets located		
in the U.S.? If not, complete line 16	-	-
16. Is line 11 at least 6 times line 3?	-	-
17. Is line 4 divided by line 6 less than		
2.0?		-
18. Is line 10 divided by line 4 greater		
than 0.1?	-	-
19. Is line 7 divided by line 8 greater than		
1.5?		-
·		
ALTERNATIVE II		
-4. Sum or current closure and post-clo-		
sure cost estimates (total of all cost		
estimates listed above)	8	
2. Amount of annual aggregate liability		
coverage to be demonstrated	8-	
3. Sum of lines 1 and 2	6-	-
4. Current bond rating of most recent		macropic
issuance and name of rating service	8	-
6 D-441-	4	

on your financial statements you may add that portion to this line)
8 Total assets in the U.S. (required only if less than 90% of assets are located in the U.S.)
9. Is line 7 at least \$10 million?
10. Is line 7 at least \$0 of assets located in the U.S.? If not, complete line 12 in the U.S.? If not, complete line 12 in line 8 at least 6 times line 3?

"total

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(g) as such regulations were constituted on the date shown immediately below.

[Signature] [Name] [Title] [Date]

6. Date of maturity of bond

closure or po

(i) A hazardous waste facility liability endorsement as required in §§ 264.147 or 265.147 must be worded as follows, except that instructions in brackets are to be replaced with the relevant information and the brackets deleted:

Hazardous Waste Facility Liability Endorsement

 This endorsement certifies that the policy to which the endorsement is attached provides liability insurance covering bodily injury and property damage in connection

with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at [list EPA Identification Number, name, and address for each facility for [insert "sudden accidental occurrences." "nonsudden accidental occurrences," or "sudden and nonsudden accidental occurrences"; if coverage is for multiple facilities and the coverage is different for different facilities, indicate which facilities are insured for sudden accidental occurrences, which are insured for nonsudden accidental occurrences, and which are insured for both]. The limits of liability are [insert the dollar amount of the "each occurrence" and "annual aggregate" limits of the Insurer's liability), exclusive of legal defense costs.

2. The insurance afforded with respect to such occurrences is subject to all of the terms and conditions of the policy; provided, however, that any provisions of the policy inconsistent with subsections (a) through (e) of this Paragraph 2 are hereby amended to conform with subsections (a) through (e):

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy to which this endorsement is attached.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264:147(f) or 265.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of this endorsement, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

(e) Any other termination of this endorsement will be affective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA-Region(s) in which the facility(sea) is (are) located.

I hereby certify that the wording of this endorsement is identical to the wording specified in 40 CFR 264.151(i) as such regulation was constituted on the date first above written, and that the Insurer is

licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

[Signature of Authorized Representative of Insurer]

[Type name]
[Title], Authorized Representive of [name of Insurer]
[Address of Representative]

(j) A certificate of liability insurance as required in §§ 284.147 or 265.147 must be worded as follows, except that the instructions in brackets are to be replaced with the relevant information and the brackets deleted:

Hazardous Waste Facility Certificate of Liability Insurance

1. [Name of insurer], (the "insurer"), of [address of Insurer] hereby certifies that it has issued liability insurance covering bodily injury and property damage to [name of insured], (the "insured"), of [address of insured] in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at [list EPA Identification Number; name, and address for each facility] for [insert "sudden accidental occurrences," "nonsudden accidental occurrences," or "sudden and nonsudden accidental occurrences"; if coverage is for multiple facilities and the coverage is

different for different facilities, indicate which facilities are insured for sudden accidental occurrences, which are insured for nonsudden accidental occurrences, and which are insured for both]. The limits of liability are [insert the dollar amount of the "each occurrence" and "annual aggregate" limits of the Insurer's liability], exclusive of legal defense costs. The coverage is provided under policy number ——, issued on [date]. The effective date of said policy is [date].

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 284.147(f) or 285.147(f).

(c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

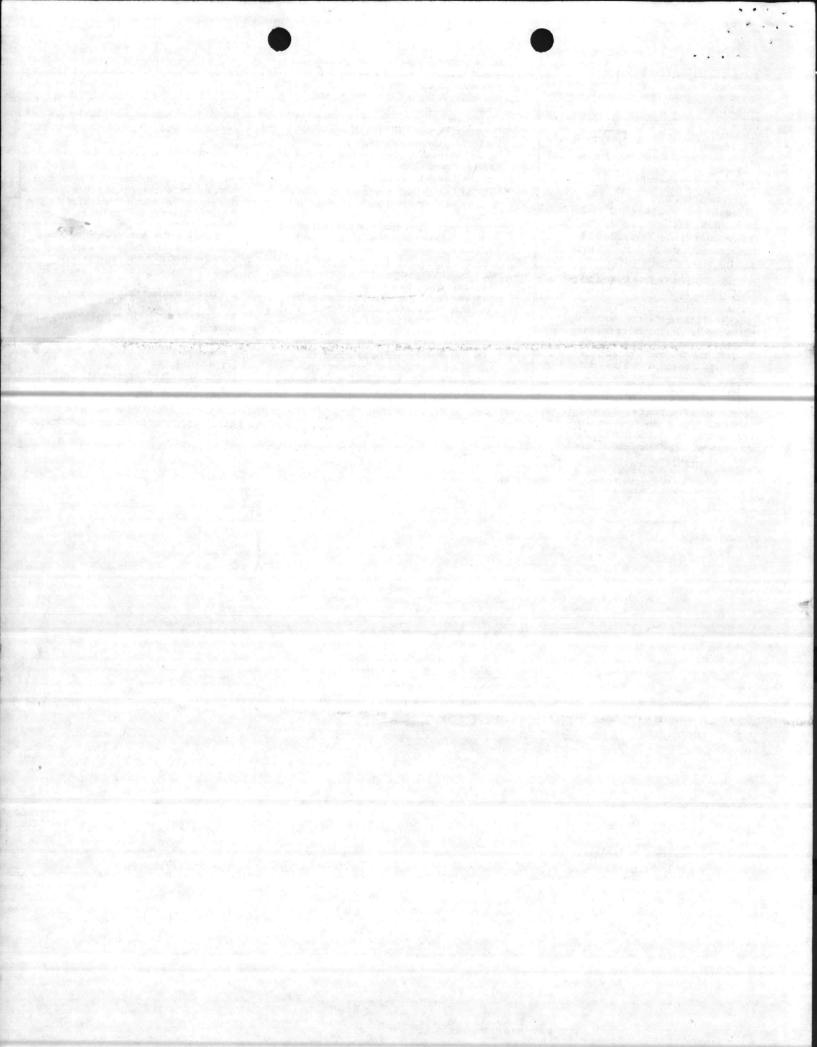
(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

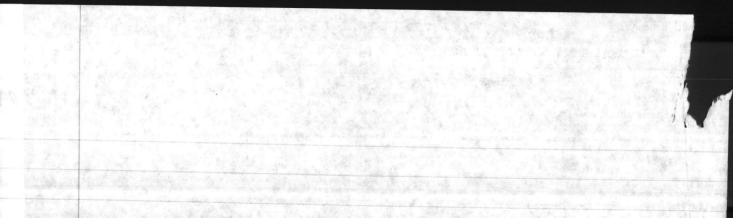
[Signature of authorized representative of Insurer]

[Type name]
[Title], Authorized Representative of [name of insurer]

[Address of Representative]



This Letter is submitted in accordance with instructions resubmission of a request to your office. This is a which was apparently lest during fransmittal.



Department of Social and Reall Services

MAIN/DDS/th 6240 SEP 2 3 1982

Col Wardall

-BSHS

Radiation Control Section Mail Stop 10-11 LF-1 Olympia, Washington 98504

Dear Sir:

Marine Corps Base, Camp Lejeune, is attempting to dispose of a quantity of low-level radioactive waste which consist of 493 "betta-buttons" (see attached description), contaminated soil, and animal bones. The items are currently packaged in 4-mil polyethylene bags, cushioned in vermiculite and contained in 6 steel 55-gallon drums (DOT Specifications 17H-Steel Drum, Federal Stock Number 8110-00-823-8121).

The purpose of this letter is to request permission (see attached DSHS form) to dispose of the material at the Richland, Washington Site operated by U. S. Ecology, Louisville, Kentucky.

Disposal of the waste will be accomplished through a commercial waste disposal firm: Southwest Nuclear Company, 906 Montgomery Street, Laurel, Maryland. 20810, in cooperation with the Naval Supply Center, Norfolk, Virginia.

Questions regarding this matter should be forwarded to Mr. Julian Wooten. Director, Natural Resources and Environmental Affairs Branch, (919) 451-5003.

Sincerely,

R. F. CALTA Lieutenant Colonel, U. S. Marine Corps Base Maintenance Officer By direction of the Commanding General

Encl

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NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS BRANCH
BASE MAINTENANCE DIVISION
MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA 28542

9-2-87

Date

From: Director
To: B MO
Subj:

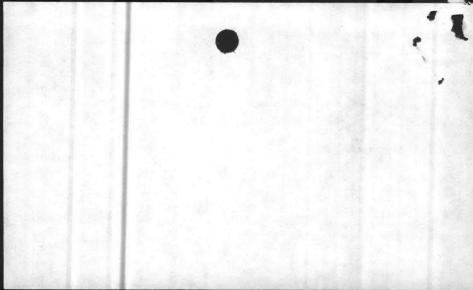
1. Attached provides additional
info on contaminated soil at

info on contaminated soil at

enfo on a

Julian

MREA Peternel-Relevance Dany, 9-13-82 Note and Return - Rustain Hg Worte. Julia DPS



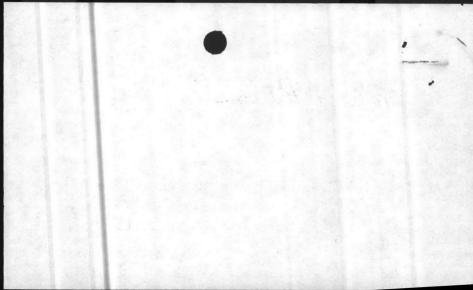
9-3-82

BASE MAINTEN CE DIVISION Marine corps Base Camp Lejeune, North Carolina 28542

Assistant Base Maintenance Officer

I comme with who worten's resommendation. Will take action to notify maint personnel located at mens, of you agree.
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to Col Marshall sarrely sinsever chi quotion, of the constant SWE

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MAIN/DDS/th 6240 DATE: 8 Sep 1982

FROM Director, Natural Resources and Environmental Affairs Branch

TO Base Maintenance Officer

Reporting of Hazardous Material/Oil Spills aboard MCAS(H), New River; responsibilities and procedures for

Encl: (1) BO 6240.5

(2) BO 11090.1B

(3) Excerpts from MCBCLNC/MCAS(H)NR Logistic Support Consolidation Agreement

(4) CO MCAS(H)NR memo 222/MW/mc 6280 of 12 Aug 1982

- 1. This memo is in response to AC/S Facilities recent inquiry regarding the subject reporting responsibilities and procedures. As spelled out in enclosures (1) and (2), the organization reporting a spill aboard MCAS(H), NR should first notify the Base Fire Department (451-3333) and then the Station S-4/Officer of the Day (after hours). Enclosure (3) further clarifies mutual responsibilities relative to response to and clean up of the subject spills. Basehas primary responsibility for cleanup and reporting to outside agencies. Any routine follow-up investigation is the responsibility of the Air Station.
- 2. The supervisory ecologist was advised of the mercury spill discussed in enclosure (4) during a discussion with MCAS(H) safety manager, Mary Wheat, on 3 August 1982.
- 3. All spills within areas aboard MCAS(H), NR occupied by Base organizations should be promptly reported as spelled out in paragraph (1) above.

J. I. WOOTEN

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

BO 6240.5 MAIN/DDS/th 22 Jun 1982

BASE OPDER 6240.5

Commanding General From: Distribution List

Subj: Hazardous Material Disposal Program

Ref:

(a) Resource Conservation and Recovery Act (Pub No. 94-580) (42 USC 6901-6987) (NOTAL)

(b) Environmental Protection Agency Regulations contained in Code of Federal Regulations, Title: 40 Parts 260-265 (NOTAL)

(c) Dept of Transportation Regulations contained in Code of Federal Regulations, Title: 49 Parts 100-179 (NOTAL)

(d) MCO 4570.24A (NOTAL)

(e) MCO P11000.8A (f) BO 11090.1B

(g) BO 11350.2 (h) MCO 5100.25

(i) BO 11320.1G

(j) AS(H)0 6280.1 (NOTAL)

(1) Hazardous Waste Labeling Instructions Encl: (2) Hazardous Material Disposal Procedures

- 1. Purpose. To publish responsibilities for disposal of hazardous material and hazardous waste regulated by references (a), (b) and (c) and to establish uniform disposal procedures as outlined in enclosures (1) and (2).
- 2. Policy. It is the policy of the Commanding General that compliance with hazardous material and hazardous waste disposal regulations will be accomplished through a centralized program committed to maximizing re-utilization and recycling so as to minimize impact on the environment. Final disposal (i.e., burial, incineration, etc.) and long term storage (i.e. for over 90 days) of hazardous waste are prohibited aboard Camp Lejeune and Marine Corps Air Station (Helicopter), New River, except with the specific written permission of the Commanding General, Marine Corps Base.

3. Background

- a. On 19 November 1980, comprehensive federal legislation (reference (a)), which was implemented by reference (b), placed stringent legal requirements on the management of hazardous material and hazardous waste. Civilian and military personnel failing to follow established procedures may be subject to both civil and criminal penalties. Violations of these procedures may consist of acts of commission, such as mishandling hazardous material as well as acts of omission, such as failing to report to proper authorities observed mishandling of hazardous material or other violations of reference (a). Strict adherence to the procedures contained in this Order is necessary to avoid imposition of civil and/or criminal penalties.
- b. Subpart D of Part 261 of reference (b) lists specific items which generally must be disposed of as hazardous waste. Enclosure (1) identifies types of waste commonly generated aboard military installations which are listed in Subpart D of reference (b).
- c. Department of Defense (DOD) and Marine Corps policy related to the subject program is outlined in references (d) and (e). Reference (f) provides installation policy and guidelines for hazardous substance spill prevention, containment, reporting and cleanup. Reference (g) identifies the types of solid waste which can be disposed of in the base refuse collection and disposal system. Reference (h) outlines DOD and Marine Corps policy on the collection and dissemination of health and safety information related to the procurement, receipt, storage, handling, issue, transportation, use and disposal of hazardous materials. Reference (i) provides information relative to local fire prevention and protection requirements applicable to hazardous material storage and handling. Reference (j) established procedures for hazardous waste management applicable to Commands located at Marine Corps Air Station (Helicopter) (MCAS(H)), New River.

4. Responsibilities

- a. Organizational Commanders will:
- (1) Implement procedures and guidelines established by this Order for hazardous material and waste disposal and related handling, laheling, packaging, storage and transportation.
- (2) Maintain copies of this Order and reference (f) at work sites where hazardous material and waste are routinely handled, stored or generated and ensure that personnel are familiar with the contents thereof.

(3) Inform newly assigned personnel of the characteristics and special handling requirements of hazardous material and waste used or generated at the work site.

(4) Report all hazardous material and hazardous waste spills to the Base Fire Department at telephone 451-3333. Commands at MCAS(H), New River will additionally report all spills at Station S-4 Office, telephone 455-6506/6068. Reference (f) pertains.

(5) Provide weekly inspections of all areas used to store hazardous waste and take action required to prevent and correct leaks, spills and other discrepancies. Maintain a log of these inspections showing the following:

(a) Date and time of the inspection

(b) Name(s) of the inspector(s)

(c) Notation of discrepancies observed

(d) Date and nature of corrective action taken.

Note: Reference (b) requires inspection records to be retained for three years.

- b. Officer in Charge of Preservation, Packaging and Packing (PP&P) will:
- (1) Upon request from Hazardous Material Disposal Coordinators inspect hazardous material and/or waste requiring disposal and provide such technical assistance and material support as required to package material and waste for disposal.
- (2) Make appropriate transportation certifications as required by the Department of Transportation and the Environmental Protection Agency.
 - c. Defense Property Disposal Officer (DPDO), Camp Lejeune will:
- (1) Accomplish disposal and related long-term storage of hazardous material and waste in accordance with reference (b) and applicable DOD regulations.
- (2) Determine which items generated aboard this installation will be disposed of as hazardous waste (either on a case-by-case basis or by publishing listings of specific items).
- (3) Publish DPDO procedural and administrative requirements for turn-in of hazardous material and hazardous waste.
- (4) Notify cognizant officers of changes in DPDO policy which would affect implementation of the subject program.
- (5) Maintain records of DPDO hazardous material and waste disposal activity in accordance with reference (b).
- (6) Inspect hazardous material and waste for which DPDO has accepted accountability and take action required to correct deficiencies as required for compliance with reference (b).
- d. Assistant Chief of Staff, Manpower will: Develop and implement a program to provide training and related recordkeeping required by reference (b).
 - e. Base Safety Officer will:
- (1) Provide technical assistance on matters dealing with personnel safety related to hazardous material and waste management.
 - (2) Include hazardous material and waste disposal considerations in routine safety inspection programs.
 - f. Assistant Chief of Staff, Logistics will:
- (1) Develop and implement a hazardous waste manifesting system and related recordkeeping system required by references (b) and (c).
- (2) Prepare the following reports for Marine Corps Base, Camp Lejeune, for submission to the appropriate regulatory agency(ies)
- (a) Hazardous Waste Generator's Annual Report and Exception Report as required by Section 262.4 of reference (b).
 - (b) Facility Annual Report and Unmanifested Waste Reports required by Section 264.7 of reference (b).
- (3) Serve as point of contact between Marine Corps Base and DPDO on matters dealing with hazardous material and waste disposal and related storage and handling.
- (4) Negotiate necessary agreements between Marine Corps Base and DPDO on matters dealing with hazardous material and waste disposal and related storage and handling.

B0 6240.5 22 Jnn 1982

- (5) Provide properly equipped vehicles and trained operators for transportation of hazardous waste (when private contractor is utilized, ensure that the transporter is properly registered with the Environmental Protection Agency).
- (6) Assume overall responsibility for operating long-term hazardous waste storage facility at Building TP-451 in accordance with standards contained in Part 265 of reference (b) until such time as the DPDO assumes this responsibility.
- (7) Provide a hazardous material disposal coordinator to perform duties outlined in paragraph 4K of this Order with respect to disposal of hazardous material/waste by Marine Corps Base organizations.
 - g. Assistant Chief of Staff, Facilities will:
- (1) Inform cognizant officers of federal, state and military environmental regulations and policies applicable to the subject program.
- (2) Provide environmental monitoring and related followup of existing and past hazardous waste storage or disposal sites as required by reference (b).
- (3) Initiate projects to provide required hazardous material spill prevention, control and countermeasures facilities.
 - h. Public Works Officer will:
- (1) Provide engineering support and related technical assistance pertaining to hazardous material and hazardous waste storage and handling facilities.
- (2) Include hazardous material and waste disposal and related management considerations in contracts as required to effect compliance with references (a) through (d).
- (3) Enter pollution abatement deficiencies into the Naval Environmental Protection Support Service (NEPSS) information system and develop appropriate pollution abatement projects in accordance with reference (e).
 - i. Base Fire Chief will:
- (1) Provide routine inspection of hazardous material and waste storage areas as required to identify spill and fire hazards.
 - (2) Provide initial response to hazardous material spills in accordance with reference (f).
 - j. Base Maintenance Officer will:
- (1) Monitor ongoing activities as required to identify, evaluate and provide up-channel reporting of environmental deficiencies related to the subject program.
 - (2) Provide laboratory support required for identification of hazardous material and waste.
- (3) Provide point of contact with federal and state regulatory agencies on environmental matters pertaining to the subject program.
- (4) Upon request, provide on-site technical assistance as required to enable Organizational Commanders to evaluate compliance with this Order and applicable environmental regulations.
 - k. Hazardous Material Disposal Coordinator (HMDC) will:
 - (1) Ensure Command compliance with the procedures in enclosure (2).
- (2) Inform organizations within the HMDC's cognizance of changes in hazardous material/waste storage handling and disposal procedures.
- (3) Identify training requirements for personnel within the HMDC's cognizance routinely handling hazardous material or waste.

Action

- a. Major Commands (i.e., MCAS(H), New River; 2d Marine Division, Naval Regional Medical Center, Naval Regional Dental Center and 2d Force Service Support Group) will:
- (1) Nesignate a Hazardous Material Disposal Coordinator to serve as point of contact on matters related to implementation of this Order.
- (2) Monitor all aspects of this disposal program internal to their Command to ensure compliance with this Order.
- b. Battalion/Aircraft Group/Separate Company Commanders 2d Marine Division, 2d Force Service Support Group and Marine Corps Air Station (H). New River will:

BO 6240.5 22 Jun 1982 (1) Ensure that organizations within their cognizance comply with requirements of paragraph 4a(1)-(5) of this Order. (2) Implement inspection and recordkeeping requirements of paragraph 4a(5) of this Order for organizations within their cognizance. c. Commanders procurring hazardous material outside the Federaly Supply System will: require the manufacturer/distributor to provide the information shown on enclosure (2) of reference (h) and will furnish a copy of the information to the Base Safety Officer and Air Station Safety Manager. 6. Applicability. Having received the concurrence of the Commanding Generals, 2d Marine Division, FMF; 2d Force Service Support Group, (Rein), FMFLANT; 2d Marine Aircraft Wing, FMF, Atlantic and the Commanding Officers of the Marine Corps Air Station (Helicopter), New River and tenant units; Naval Regional Medical Center and Naval Regional Dental Center, this Order is applicable to those Commands. DISTRIBUTION: A BMAINO (100)

HAZARDOUS WASTE LABELING INSTRUCTIONS

(See Note #1)

	RDOUS
WA	STE
FEDERAL LAW PROP	HIBITS IMPROPER DISPOSAL
OR THE NEAREST POLICE	BASE FIRE DEPARTMENT AT 451:3333, CE. OR PUBLIC SAFETY AUTHORITY. NMENTAL PROTECTION AGENCY
PROPER D.O.T. SHIPPING NAME See Note #	2 un or na#
GENERATOR INFORMATION: I	NAME: MARINE CORPS BASE, CAMP LEJEUNE, D NO. NC6170022580
NAME OF SUBUNIT GENERATING	G WASTE:
	EPA WASTE NO. (Leave Blank)
ACCUMULATION START DATE See Note #3	MANIFEST (Leave 31ank)
	WITH CARE!

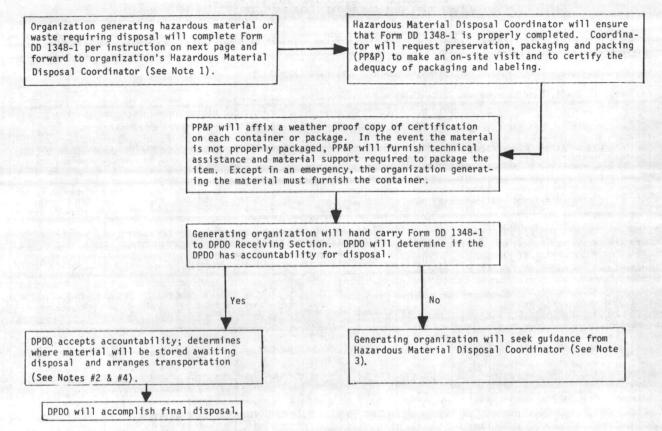
- Note #1: The depicted label shall be put on all hazardous waste storage containers used on board Marine Corps Base. Organizations on board MCAS(H), New River will use labels provided by Air Station S-4 Office. See next page for examples of hazardous wastes.
- Note #2: If known, insert name and UN or NA# listed in 49CFR Part 172, otherwise enter NSN and common/trade name used locally to identify item.
- Note #3: Insert the date that filling of container begins. This date must be entered prior to use of container.

B0 6240.5 22 Jun 1982

List of Pre-Determined Hazardous Waste (See Notes #1 and #3)

- 1. The following spent halogenated solvents used in degreasing: tetrachloroethylene, trichloroethylene, methylene chloride, 1, 1, 1-trichloroethane, carbon tetrachloride and chlorinated fluorocarbons.
- 2. The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1, 1-trichloroethane, chlorobenzene, 1, 1, 2-trichloro-1, 2, 2-trifluoroethane, ortho-dicholorobenzene and trichlorofluoromethane.
- 3. The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl alcohol, cyclohezanone and methanol.
- 4. The following spent non-halogenated solvents: cresols and cresylic acid and nitrobenzene.
- 5. The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol and pyridine.
- 6. Spent cyanide plating bath solutions from electroplating operations (except for precious metals electroplating spent cyanide plating bath solutions. See Note #2).
- 7. Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process (except for precious metals electroplating spent stripping and cleaning bath solutions. See Note #2).
- 8. Spent cyanide bath solutions from mineral metals recovery operations.
- Note #1: This is a partial listing and is subject to change. Discarding these items into waste oil collection tanks is prohibited.
- Note #2: These solutions and sludges are turned in for processing under the Precious Metals Recovery Program and should be turned in as HM.
- Note #3: Waste contained in this listing is limited to those items specifically identified in subpart D of part 261 of reference (b). The local Defense Property Disposal Officer is responsible for identifying items which although not specifically identified by reference (b), must be disposed of as hazardous waste.

HAZARDOUS MATERIAL DISPOSAL PROCEDURES



- Note 1: Organization having physical custody of material awaiting disposal will conduct weekly inspections in accordance with paragraph 4(a)(5) of this Order, if the item is hazardous waste.
- Note 2: If an item to be transported is a hazardous waste subject to RCRA, the Traffic Management Officer will transport. A North Carolina Hazardous Waste Shipping Manifest prepared prior to transporting, will be attached to DD-1348-1 and will be carried by driver of vehicle used to transport waste.
- Note 3: These items will be disposed of on a case by case basis utilizing procedures developed in accordance with applicable regulations. Assistant Chief of Staff, Facilities, Marine Corps Base, will coordinate development of appropriate procedures.
- Note 4: The material will not be moved without prior concurrence of DPDO unless required by an emergency, in which case, DPDO will be informed as soon as possible.

INSTRUCTIONS FOR COMPLETING DD FORM 1348-1 BY MARINE CORPS BASE AND MARINE CORPS BASE TENANTS (SEE NOTE 1)

The following modifications/changes are to be incorporated into all disposal turn-in documents for hazardous materials or hazardous waste.

Block A - Name of Organization (telephone number) - NC 61700 22580

Block B - MCB, Camp Lejeune, NC (451-1634) - NC 61700 22580

Block C - Mark for (normally left blank): Insert HM (if turn-in is hazardous material) or HW (if turn-in is hazardous waste). See enclosure (1) for listing of HW commonly generated aboard military installations.

Block U - Freight Classification nomenclature: Add characters (two alpha, four numeric) identification number as shown in 49 CFR, Part 172. If unable to identify material or waste leave this block blank (See Note 2).

Block Y - Use this block (in lieu of Blocks AA through EE) for the Deposit Account Number.

Block AA and BB: MCB, Camp Lejeune, NC - NC 6170022580

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

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." (See Note 3).

(Signature)	(Date)

- Note 1: Marine Corps Air Station (H), New River and tenants shall complete DD Form 1348-1 in accordance with Air Station Order 6280.1.
- Note 2: Hazardous Material Disposal Coordinator will request Base Maintenance Officer representative (telephone 5977) to accomplish sampling and analysis of item(s), as required, to complete Block U.
- Note 3: Certification will be signed by authorized representative of generating organization. It is recommended that person signing have first hand knowledge of or supervisory responsibility for items being disposed of.



UNITED STATES MARINE CORPS MARINE CORPS BASE

CAMP LEJEUNE, NORTH CAROLINA 28542

BO 11090.1B MAIN/DDS/th 28 May 1981

BASE ORDER 11090.1B

Commanding General Distribution List

Subj: Oil Pollution Prevention and Abatement and Oil and Other Hazardous Substances Spill Contingency, Plan

(b) Resource Conservation and Recovery Act (RCRA) of 1976 (NOTAL)

(c) Clean Water Act (NOTAL)

(d) Oil Spill Prevention Control and Countermeasure Plan of 10 June 1978, Camp Lejeune, NC (NOTAL)

(1) Oil and Hazardous Material Spill Prevention, Containment, Cleanup and Disposal Guidelines (2) Oil and Other Hazardous Material Spill Contingency Plan

To revise existing oil and other hazardous material related pollution abatement and prevention procedures for Marine Corps Base, Camp Lejeune and Marine Corps Air Station (Helicopter) (MCAS(H)), New River and to assist the Commanding General in the implementation of reference (a) with respect to pollution abatement.

2. Cancellation. BO 11090.1A.

Policy. It is the continuing policy of the Commanding General to actively participate in environmental pollution abatement, to take positive planning and programming action to abate and correct oil and other hazardous materials, related pollution problems and to incorporate appropriate pollution control and prevention facilities in all new construction aboard this installation. The intent of this policy is to carry out the applicable measures of references (a), (b), (c) and (d) and to prohibit the discharge of oil, oily mixtures and other hazardous substances except in designated areas by authorized personnel.

4. Responsibilities

- a. Base Maintenance Officer has overall responsibility for:
- (1) Maintenance of water pollution abatement facilities and the central storage and related collection and transportation of waste petroleum products.
- (2) Providing personnel required for routine monitoring, surveillance, upchannel reporting and enforcement of unauthorized discharges of oil and other hazardous materials and related significant environmental problems of an ongoing nature involving the handling and disposal of petroleum products and other hazardous materials regulated by references (a), (b) and (c).
- b. Commanding Officers/Area Commanders are charged with the responsibility of preventing spillage and other unauthorized discharge of oil and other hazardous materials within their own areas and will develop and implement plans and procedures which are consistent with applicable regulations and enclosures (1) and (2) for preventing, reporting, containing and cleaning up such spillage or unauthorized discharge.
- c. Director, Natural Resources and Environmental Affairs Division, Base Maintenance Department or his representative will assume responsibility of On-Scene Coordinator (OSC) upon arrival at the scene of an oil or other hazardous material spill in accordance with procedures outlined in references (a) and (b) and enclosure (2).
- d. Base Fire Chief or his senior representative will provide initial response and other assistance with any spill of oil or other hazardous material as outlined in enclosure (2), until a verification is made that the reported spill has occurred in an aircraft operating area aboard MCAS(H), New River. If the latter situation exists, the Base Fire Chief will provide a standby crew to assist, if the crash crew MCAS(H), New River is unable to contain the spill within the aircraft operating area.
- e. Crash Crew, MCAS(H), New River will develop and implement a written procedure for the initial response and containment and cleanup of oil and other hazardous materials spills in aircraft operating areas aboard MCAS(H), New River. Procedures will be consistent with applicable regulations and enclosure (2).
- 5. Action. Discharge of oils or other hazardous materials on or into the grounds and streams of this installation is prohibited. Cognizant officers will take necessary action to assure compliance. Commanding Officers/Area Commanders shall conform to the standards and criteria set forth in enclosures (1) and (2).

(See Page 2 of enclosure (2) for reporting spills

BO 11090.1B

28 MAY 1981

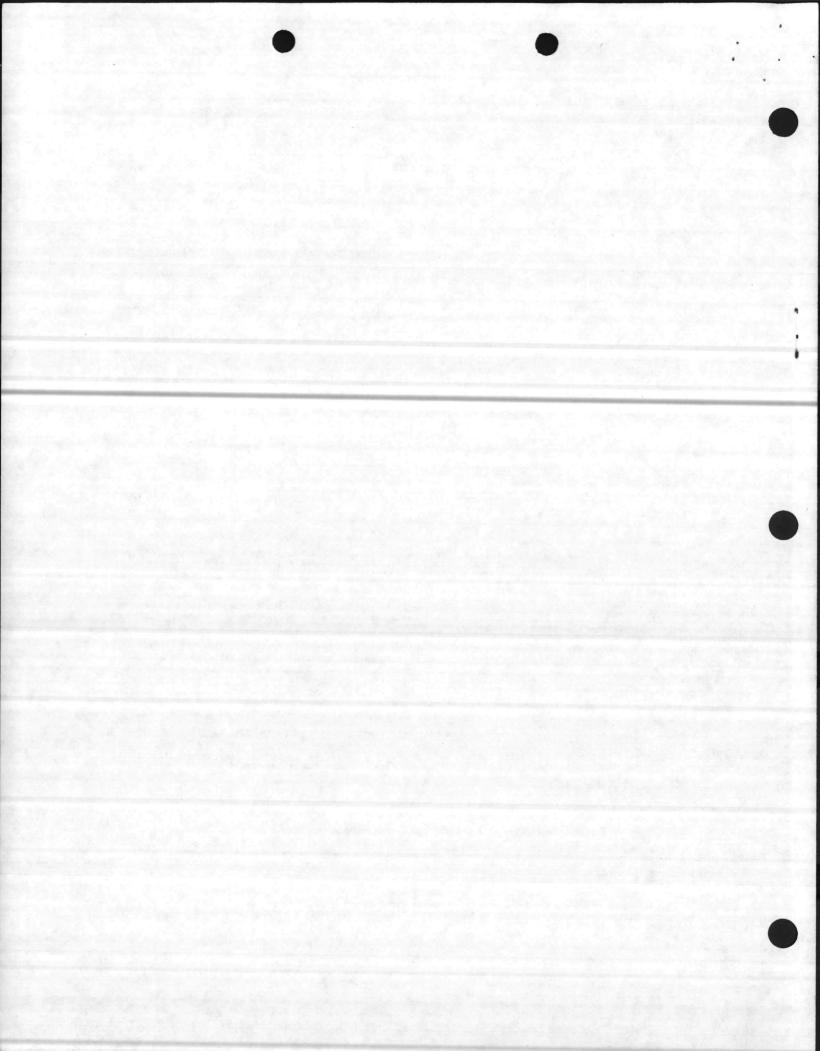
6. Applicability. Having received the concurrence of the Commanding Generals, 2d Marine Division, FMF; 2d Force Service Support Group, (Rein), FMFLANT; and the Commanding Officers of the Marine Corps Air Station (Helicopter), New River and tenant units; Naval Regional Medical Center; and Naval Regional Dental Center, this Order is applicable to those Commands.

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BO 11090.1B

OIL AND HAZARDOUS MATERIAL SPILL PREVENTION, CONTAINMENT, CLEANUP, AND DISPOSAL GUIDELINES

- 1. The prevention of oil and hazardous-material spills and the resultant environmental damage is the responsibility of all Commanders.
- 2. All Commanders and Department Heads will publish and prominently post directives setting forth detailed policies and procedures for the control and prevention of oil and hazardous-substance pollution specifically applicable to their organization.
- 3. All Commanders and Department Heads will take the following actions:
- a. Take positive measures to prevent spills of oil and hazardous substances to include a review of the Command's maintenance and operational procedures.
 - b. Conduct frequent inspections of areas and facilities assigned to ensure compliance with published procedures.
- c. Establish immediate action procedures for the amelioration of pollution which may result from oil and hazardous-substance spills, to include the stocking of materials required to carry out the procedures.
- d. Ensure that all personnel within their Command are thoroughly indoctrinated regarding the environmental impact of oil and hazardous substance spills and proper disposition of oil and hazardous substances.
 - e. Encourage maximum reuse of technically contaminated fuels by multifuel-engine powered tactical vehicles.
- 4. The following quidelines are generally applicable to garrison operations:
- a. Contaminated fuels which cannot be burned in tactical vehicles and other used petroleum products, except gasoline, will be collected in a tank of at least 250-gallon capacity equipped with a funnel, strainer and cover to prevent entrance into the tank of trash, water and other foreign matter. When the container requires emptying, the Officer in Charge (OIC) will notify the Base Maintenance Department (Telephone 5909). The Base Maintenance Department will dispatch a vehicle to remove the waste oil. In the event of an emergency 55-gallon drums may be used as a temporary expedient storage container for waste oil.
- b. Waste lubrication grease will be collected, stored in suitable containers and disposed of in accordance with instructions provided by Base Maintenance Department representative. Send request via Chain of Command to the Base Maintenance Officer.
- c. Oil-saturated soil in the vicinity of oil and petroleum storage areas should be removed to the sanitary landfill and replaced with fresh earth.
 - d. To dispose of contaminated gasoline contact the Base Fire Department (Telephone 3004).
- e. Disposal of hazardous waste and other hazardous substances such as acids, poisons and solvents through any drainage system to include sinks, wash racks, storm drains and natural drainage systems is specifically prohibited. These products will be segregated and stored in suitable containers and will be disposed of in accordance with instructions provided by Commanding General, Marine Corps Base, Camp Lejeune.
- f. Petroleum products containers will be disposed of at the sanitary landfill, or recycled, if appropriate, with the exception of 55-gallon drums and durable metal containers which will be disposed of through the Defense Property Disposal Officer, Building 906.
- g. Personnel changing private owned vehicle (POV) oil on Base will use established Base Special Service facilities and deposit waste oil in one of the authorized collection tanks on Base and the Air Station.
- h. Oil and gasoline storage containers larger than 550-gallon capacity will be diked to include a drainage line and valve which will be locked. The latter will be operated only by personnel authorized by the Unit Commander.
- 5. Field operations will comply with the guidance enumerated in the following subparagraphs:
 - a. All tactical refueling systems installed on Base must first be approved by the Base Maintenance Officer.
- b. Fuel stored in tactical refueling systems will be properly diked, as required by current regulations. As a general rule, the dike must be capable of containing at least the volume of the container stored within it.
 - c. When using fuel tanker vehicles:
 - (1) Hoses, nozzles and connections will be checked frequently for serviceability to avoid leakage of fuel.
 - (2) Refueler operators will stay with the vehicle during refueling operations.
- (3) Tanker vehicles containing fuel will be parked in such a manner as to avoid the possibility of spilled fuel entering natural or man-made drainage systems.
 - (4) During recirculation operations, nozzles will be secured to the vehicle.
- (5) All waste petroleum products generated during field exercises will be stored (55-gallon drums, etc.) and disposal instructions obtained from the Director, Natural Resources Division, Base Maintenance Department (451-5003).



OIL AND OTHER HAZARDOUS MATERIAL SPILL CONTINGENCY PLAN

FOR

MARINE CORPS BASE, CAMP LEJEUNE, NORTH CAROLINA
MARINE CORPS AIR STATION (HELICOPTER), NEW RIVER, JACKSONVILLE, NORTH CAROLINA
MARINE CORPS HELICOPTER OUTLYING FIELD, OAK GROVE, JONES COUNTY, NORTH CAROLINA

PREPARED

OCTOBER 1980

BO 11090.1B 28 MAY 1981 1. Reporting Spills of Oil and Other Hazardous Substances a. Materials Classification - The following products are examples of oil compounds or hazardous substances which must be reported if spilled on the ground or water in any amount: JP-4 & JP-5 Fuels Lube Oils Paint Thinner No. 6 Fuel Oil Gasoline Hydraulic Fluid Organic Solvents Kerosene Acids Cleaning Solutions Lube Grease No. 2 Fuel Oil Poisonous Chemicals b. Reporting Procedures - All spills of oil or hazardous materials shall be reported immediately to the Base Fire Department Phone 3333 (on base) or 451-3333 (off base). The report shall include location (Building Number) of spill, substance spilled and the approximate amount. All spills occurring at Marine Corps Air Station (Helicopter) New River will also be reported to the Station S-4 (455-6068 - 455-6518) during normal working hours and to the Station Officer of the Day after normal working hours (455-6111). c. Posting of Oil Spill Procedure - Signs shall be posted in every building, tank location and field service location where oil or hazardous materials are used. The sign shall have a yellow background with black lettering indicating the following information: IN CASE OF AN OIL OR HAZARDOUS MATERIAL SPILL
CALL BASE FIRE DEPARTMENT
ON BASE 3333/OFF BASE 451-3333
NOTIFY YOUR COMMANDER/SUPERVISOR IMMEDIATELY d. Initial Containment Procedure - Remain in area - - - Do Not Wash Down With Water - - - Keep Personnel Out of the Area - - - Block Runoff with Earth Materials to Prevent Spreading, when possible. 2. Response to Spill a. Fire Department - Fire Department shall dispatch a regular fire fighting unit to the scene of a reported spill. The Base Fire Chief or his senior representative shall report to the scene as soon as possible. Dispatcher will immediately notify the Base Fire Chief or his senior representative who will perform the following duties: (1) Assume the role of On-Scene Coordinator (OSC). (2) Take all necessary immediate steps to contain the spill, eliminate any fire hazards and protect all personnel from exposure and request the assistance of the Base Safety Officer, if required (See page 4, Enclosure (2)). (3) Notify the Natural Resources and Environmental Affairs Director (Telephone 5003) of the spill location and the nature and quantity of spilled materials. (4) Evaluate the spill situation and request necessary logistical support from the Base Maintenance Officer to contain the spill and facilitate the cleanup and recovery of the spilled materials. (5) OSC duties shall transfer to the Director, Natural Resources and Environmental Affairs upon his arrival at the scene. (See page 4, Enclosure (2) for Personnel and Public Safety Coordination). b. Base Maintenance Officer (1) Base Maintenance Officer shall maintain the inventory of materials and equipment as established in Appendix A of enclosure (2). (2) Base Maintenance personnel shall respond immediately to the request of the OSC with men and equipment requested. (a) Direct supervision shall be from the OSC. (b) Maintenance personnel shall remain at the spill scene until authorized to depart by the OSC. c. Natural Resources and Environmental Affairs Division (1) The Director or his authorized representative shall proceed to the scene and assume the duties of the OSC. The duties shall include the following categories: (a) Direct all containment and cleanup activities. (b) Report oil spills that discharge into the inland waters or coastal waters to the following: Base Maintenance Officer; Assistant Chief of Staff, Facilities, Marine Corps Base; Marine Safety Officer, U. S. Coast Guard, Wilmington, North Carolina and the Environmental Regulatory Agencies, as required. (c) Request U. S. Coast Guard assistance for spills into waters that cannot be contained promptly by joint efforts of the Fire Department and Base Maintenance crews. ENCLOSURE (2)

BO 11090.1B 28 MAY 1981

- (2) The Natural Resources and Environmental Affairs Division Director or his representative shall remain at the scene of the spill until all contaminant is properly contained and the danger of oil contamination of waterways is eliminated.
- (3) At the conclusion of all cleanup operations, the official report submitted to the Environmental Protection Agency (EPA), Region IV, shall be prepared in accordance with requirements of Federal Water Pollution Control Act and EPA regulations in effect at the time. The report shall be transmitted to EPA through the directives of the Commanding General.

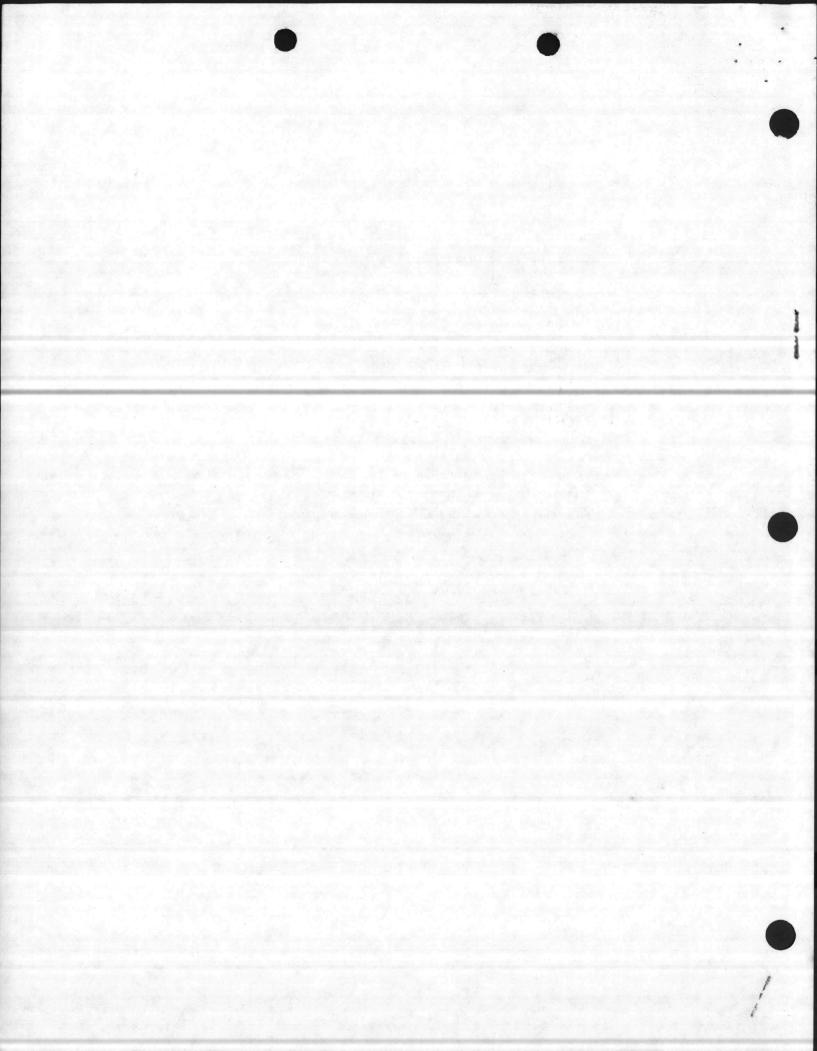
3. Spill Containment and Cleanup

- a. Small Spills (less than one gallon)
- (1) Cause: Gasoline or fuel oil spills at fueling locations occur by overfilling or blow back from the tank receiving the fuel.
- (2) Reporting: This type of spill requires reporting to the Office of Natural Resources and Environmental Affairs (Phone 1-919-451-5003). The fuel spill must be promptly cleaned up by the person at the scene.
 - (3) Containment Procedures:
 - (a) DO NOT FLUSH INTO STORM SEWER OR DRAINAGE DITCH.
- (b) Cover entire spill with sand or absorbent material from storage bin or container. Add material as liquid appears in the surface of the sand or absorbent material.
- (c) Cleanup contaminated sand or absorbent material with broom and shovel placing it in a container (metal) for disposal or possible reuse. The container shall be labeled "Waste Oil Refuse".
- (d) If storage bin of sand or absorbent material is less than one-half full after using, call Base Maintenance Department (3001) to inform them of the location needing additional material.
- (e) Reapply a second coat of sand or absorbent material in a very light layer to assure all gasoline or fuel oils have been blotted up. Brush material back and forth over the area and then sweep up completely. This material can be replaced in the fresh storage bin rather than depositing it in the "Waste Oil Refuse" container.
 - b. Spills on Concrete Aprons (more than one gallon)
 - (1) Reporting: Call Base Fire Department
 - (2) Containment Procedures:
 - (a) DO NOT FLUSH INTO STORM SEWER OR DRAINAGE DITCH.
- (b) The person on-site shall erect a two-to-three inch high sand or earth dam on the concrete or at the edge of the concrete below (downstream) the direction that the spill is flowing. This is the first step in containment.
- (c) Apply sand or absorbent materials that are available around the perimeter of the spill until the Fire Department arrives. Keep other personnel away from the area.
- (d) Fire Department shall continue abatement methods using equipment available until the Director of Natural Resources and Environmental Affairs Division or his representative arrives to determine further containment and cleanup requirements.
- (e) Base Maintenance personnel shall install dams, straw barriers, pumping equipment and other abatement or cleanup equipment as directed by the OSC.
 - c. Spills on Ground (more than one gallon)
 - (1) Reporting: Call Base Fire Department
 - (2) Containment Procedures:
 - (a) DO NOT FLUSH INTO STORM SEWER OR DRAINAGE DITCH.
- (b) The person on-site shall erect a minimum three-inch high sand or earth dam below (downstream) the direction that the spill is flowing. The dam should be made higher if the liquid pool behind the temporary dam rises to within two inches of the top. A trench or sump may be used in lieu of a dam. This is the first step in containment that must be taken promptly to prevent spreading into surface waters.
- (c) Apply sand or absorbent materials that are available around the perimeter of the spill until the Fire Department arrives. Keep other personnel away from the area.
- (d) Fire Department shall continue abatement methods using equipment available until the Director of Natural Resources and Environmental Affairs Division or his representative arrives to determine further containment and cleanup requirements.

BO 11090.1B 28 MAY 1981 (e) Base Maintenance personnel shall install dams, straw barriers, absorbents, pumping equipment and other abatement or cleanup equipment as directed by the OSC. d. Spills Entering Storm Drainage System (1) Reporting: Call Base Fire Department and emphasize that the liquid has entered a catch basin, manhole, drainage ditch, or any structure (pit) below ground. (2) Containment Procedures: (a) DO NOT ADD WATER TO FLUSH OUT STORM SEWER OR STRUCTURE. (b) The person on-site shall attempt to erect a sand or earth dam around or cover with polyethylene or other plastic materials the manhole or catch basin to prevent further entrance of liquid into the structure. This is the first step in containment that must be taken promptly to minimize the quantity of liquid that will be discharged into surface waters. (c) The person on-site shall apply sand or absorbent materials that may be available around the perimeter of the spill and at the manhole or catch basin until the Fire Department arrives. (d) Base Maintenance personnel shall place oil booms across storm drains to prevent further discharge. Public Works Department will develop maps of drainage systems required for siting booms. After spill is contained, cleanup will be initiated. Action may include the following: Inspect downstream manholes for evidence of oil progression toward discharge. If storm system has a very low flow, install straw barrier or absorption dam inside manhole. 2 Where practical, install plug in upstream side of manhole, to contain in the pipe system. 3 If the drainage system has an open ditch, install straw bale dams or aborption dam to collect spilled materials. 4 Isolate streets with contaminated manhole to prevent fires or explosions. (e) The Director, Natural Resources and Environmental Affairs Division, or his representative shall determine further containment and cleanup requirements after arriving on the scene. (f) Base Maintenance personnel shall install dams, straw barriers, aborbents, pumping equipment and other abatement and cleanup equipment as directed by the OSC. e. Spills Entering Surface Waters (1) Reporting: Call Base Fire Department and emphasize that the liquid was discharged directly into the surface waters. (2) Containment Procedure: (a) Person at the site should check the source of discharge to be assured that no further discharge can occur. Close valves, remove hose, or isolate the source from causing any further release of materials. (b) Do not allow boats or equipment to enter the surface waters where the spill has occurred. If surface type oil absorbents are available, begin spreading this material wherever an oil skim is observed. Do not enter the water to apply this material until the Fire Department arrives. (c) Fire Department shall continue abatement methods using equipment available until the Director of Natural Resources and Environmental Affairs Division, or his representative arrives to determine further containment and cleanup requirements. (d) Base Maintenance personnel shall install booms, skimmers, pumps and other abatement or cleanup equipment as directed by the OSC. 4. Responsibilities for Ensuring Personnel and Public Safety a. Overall responsibility for ensuring the safety of personnel involved in the containment and cleanup of hazardous material spill is assigned to the Base Fire Chief or his senior representative. The Base Fire Chief representative shall continue to monitor the situation and will provide required standby personnel and equipment. The Base Fire Chief representative will request the assistance of the Base Safety Officer as needed. The Base Fire Chief representative shall keep the OSC informed of any safety considerations affecting the containment and cleanup of the spill. In the event of imminent hazard to personnel involved in the spill cleanup or to the public, Base Fire Chief representative shall take appropriate action. The OSC shall assist the Base Fire Chief representative implement safety procedures required implement safety procedures required. b. Base Safety shall dispatch a safety representative to the spill scene upon request from the Base Fire Chief representative. The Base Safety representative will remain at the scene until advised by the Base Fire Chief representative that assistance is no longer required. Base Safety representative will monitor all activity at or near the spill and make appropriate recommendations to the Base Fire Chief representative. ENCLOSURE (2)

MATERIALS AND EQUIPMENT FOR OIL SPILL CONTAINMENT AND COUNTERMEASURE

Item No.	Description	Quantity
1,	Gasoline engine driven (portable) trailer mounted diaphragm pump with sectional suction and discharge hose - minimum capacity 25 gallons per minute.	2
2.	Sectional aluminum oil boom	
3.	Inflatable oil barrier, Whittaker Expandi self-inflating	300 L. F.
4.	Collapsible bag for field filling of collected oil-250 gallon capacity	2
5.	Oil skimmer (portable)type for water floating oil pick-up	1
6.	Baled hay or straw with wire or nylon baling (located at strategic areas)	200 Bales
7.	Steel fence stakes (6 feet long)	50 each
8.	Woven wire mesh (chicken wire) 3ft. width 4ft. width	200 L.F. 100 L.F.
9.	Sledge hammer - 10 lb. 5 lb. 2^{l_2} lb.	3 5 5
10.	Shovels - Long handle round point Long handle flat blade Short handle round point Short handle flat point	5 5 5 5
11.	Oil Absorbent Compound - for water spill clean up	2000 1bs.
12.	Oil Absorbent Compound for ground spill clean up - Randustrial P-218 Oil Absorbent (55-gallon drum)	25 drums
13.	Nylon rope - ½" diameter ½" diameter 3/4" diameter	200 L.F. 400 L.F. 400 L.F.
14.	Oil Sorbent Material - 3M, Conwed or Grefco	500 lb.



SUPPORT FUNCTION

15. Hazardous Material
Environmental
Management Program

MCB, CAMP LEJEUNE

Designate an activity focal point regarding hazardous material and waste management and disposal.

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Register with the Environmental
Protection Agency and North Carolina
(EPA & NC) as a long-terr storer
and transporter of all hazardous
wastes generated by MCAS(H), New
River, which are subject to the
Resource Conservation and Recovery
Act (RCRA). Obtain all permits
required by EPA and NC for storage
of hazardous wastes.

Provide guidance/material support (including laboratory analytical assistance) to ensure proper short term (less than 90 days) storage, packaging and labeling of hazardous waste: Provide laboratory support to identify hazardous waste. Provide material and supervisory support required to repackage and label hazardous materials/waste, as well as inspectors to certify the adequacy of packaging and labeling required by hazardous materials/waste regulations.

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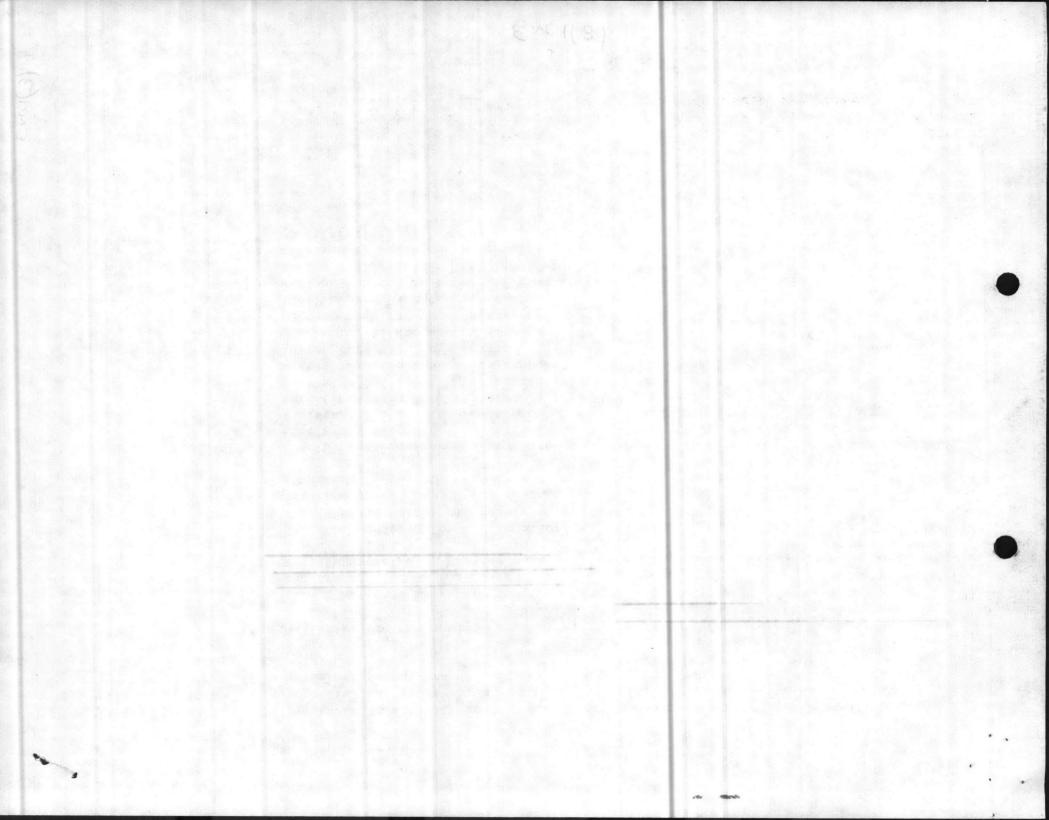
MCAS(H), NEW RIVER

Designate a Hazardous Material Disposa Coordinator to serve as an activity focus point regarding hazardous material and waste management.

Register with EPA and NC as a hazardous waste generator. Will ensure that all units and tenants properly collect, segregate and containerize hazardous waste in accordance with EPA and NC regulations applicable to hazardous waste generators, utilizing materials and supervisors provided by MCB.

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Ensure that hazardous wastes are properly identified. Provide short-term storage (less than 90 days) when required.



SUPPORT FUNCTION

Hazardous Material Environmental Management Program (continued)

MCB, CAMP LEJEUNE

wide oil hazardous material spill contingency plan. Furnish material support required and a basic level of personnel and equipment to handle routine spills. Make required reports to regulatory agencies and CMC. Provide an on-scene coordinator for spill containment and clean-up at MCAS(H), New River.

Provide long-term (more than 90 day) storage and final disposal of all hazardous wastes generated by MCAS(H) New River subject to RCRA, through facilities operated by and services provided by DPDO, Camp Lejeune, provided the wastes are properly packaged and documented. Maintain appropriate records of long-term storage and disposal of hazardous wastes accepted from MCAS(H). New River through the interservice support agreement with DPDO, Camp Lejeune, and submit all related reports required of hazardous waste storers and transporters to EPA and NC. Provide technical assistance to MCAS(H), New River on record-keeping reporting.

Provide technical assistance and environmental protection support to MCAS(H), New River regarding spill prevention control and countermeasure plan (SPCC) and hazardous material disposal.

Provide training for key personnel at MCAS(H), New River in hazardous material and hazardous waste management.

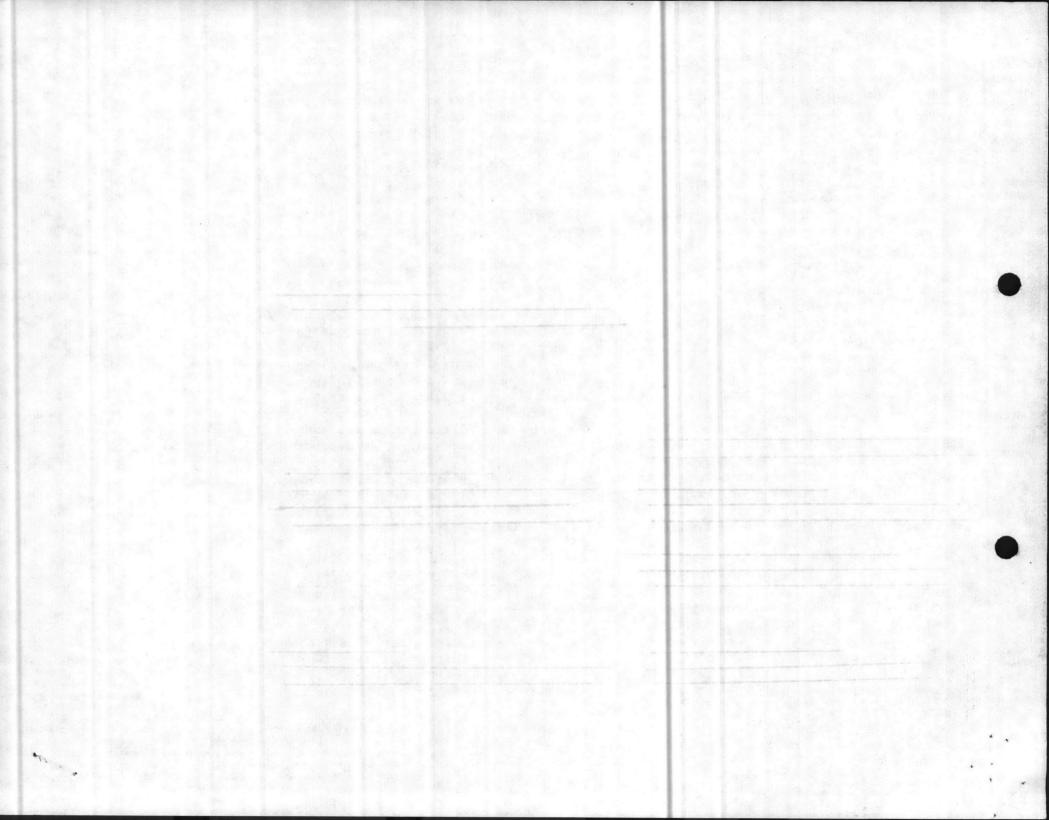
MCAS(H), NEW RIVER

Assist, as required, in implementant an area-wide oil/hazardous material spill contingency plan, including not limited to furnishing manpower requested by on-scene coordinator for spill containment and clean-up at HCAN New River. Conduct investigations of spills and submit appropriate reports thereof to MCB, Camp Lejeune.

Prepare all documents required to transport and deliver wastes to long-term
storage and disposal. Maintain appropriate
records of waste generation and shipments
and submit all reports required of hazardous waste generators to the EPA and NC.

Develop and implement an SPCC plan for hazardous waste generation and hazardous material and waste storage sites MCAS(H), New River.

Provide training for tenants and units at MCAS(H), New River in hazardous material/hazardous waste management.



Support Function

Real Property Maintenance (contd)

MCB Camp Lejeune

Formulate and execute a long range natural resources management and environmental control program. Include a forest management program for timber production and harvest, site preparation, prescribed burning, forest pest control, and forest fire control; a fish and wildlife program for control of fishing and hunting. fish pond management, wildlife habitat manipulation and protection of rare and endangered species; and environmental protection program which provides for a system of collection and disposal of waste petroleum products, monitoring for water and air pollution.

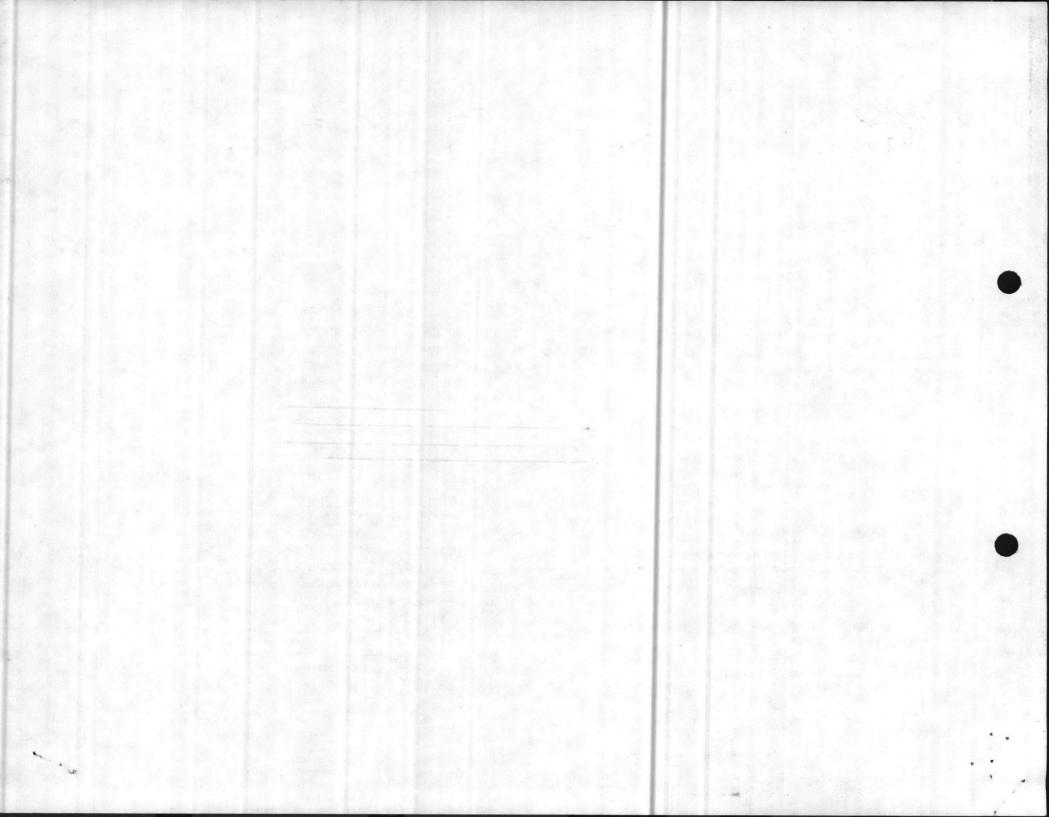
Special requirements required for hunting and fishing on or near MCAS(H) will be incorporated in all directives and programs.

MCAS(H) New River

Furnish special requirements for incorporation into the natural resources management and environmental program, as appropriate.

Provide station Environmental Affairs Officer (collateral duty assignment) liaison with and input to MCB Camp Lejeune for natural resources management and environmental affairs control programs. The station Environmental Affairs Officer will assist the MCB Camp Lejeune Environmental Affairs Officer in a monitoring capacity in the area of MCAS(H) New River, Camp Geiger and the Verona area.

The station Environmental Officer will furnish his Station Game Warden to MCB, Camp Lejeune for utilization in a monitoring and control capacity to satisfy requirements existing in the MCAS(H) New River/Camp Geiger/Verona area.



MEMORANDUM OF UNDERSTANDING between Brigadier General D. B. BARKER, Commanding General, Marine Corps Base, Camp Lejeune, North Carolina, and Colonel D. C. HEIM, Commanding Officer, Marine Corps Air Station (H), New-River, Jackschville, North Carolina.

Ref: (a) MCB CLNC/MCAS(H) NR Logistic Support Consolidation Agreement of 29 April 1977

Background. Since the promulgation of reference (a), certain questions have been raised concerning the responsibilities and roles of the two commands concerning the Wildlife Management Program at Marine Corps Helicopter Outlying Landing Field, Oak Grove. In order to resolve those questions, the below signed parties hereby agree to the following points in order to prevent misunderstandings.

2. Understandings

- a. Marine Corps Air Station (H) will assign and supervise game wardens at Marine Corps Air Station (H) and Marine Corps Helicopter Outlying Landing Field, Oak Grove.
- b. Marine Corps Air Station (H), New River is recognized as the enforcement agency for the consolidated fish and wildlife program at Marine Corps Air Station (H), New River and Marine Corps Helicopter Outlying Landing Field, Oak Grove.
- c. Marine Corps Air Station (H) shall furnish the Marine Corps Base, Camp Lejeune, with a copy of the action taken on all fish and wildlife citations.

B. BARKER, BGen, USMC

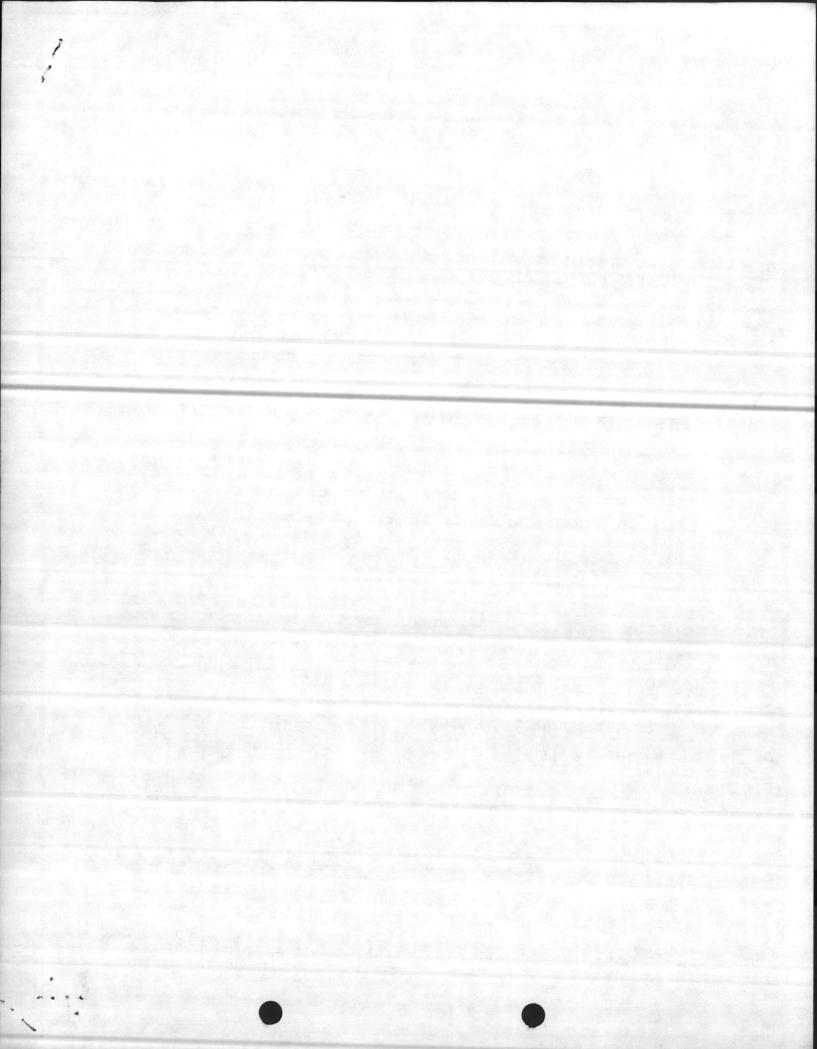
Commanding General

Marine Corps Base Camp Lejeune, North Carolina C. HEIM, Col, USMC

Commanding Officer

Marine Corps Air Station (H), New River

Jacksonville, North Carolina



OPNAV 5216/144 (REV. 6-70) 5/N 0107-LF-778-8099 DEPARTMENT OF THE NAVY

Memorandum

MAIN/RTS/th 6240 DATE: 31 Aug 1982

FROM

Director, Natural Resources & Environmental Affairs Branch

VIA

Base Maintenance Officer C ACIS FACILITIES

To:

Lithium Batteries Disposal

Ref:

(a) AC/S FAC memo FAC/JTM/hf 6280 of 23 Aug 1982

(b) BO 6240.5

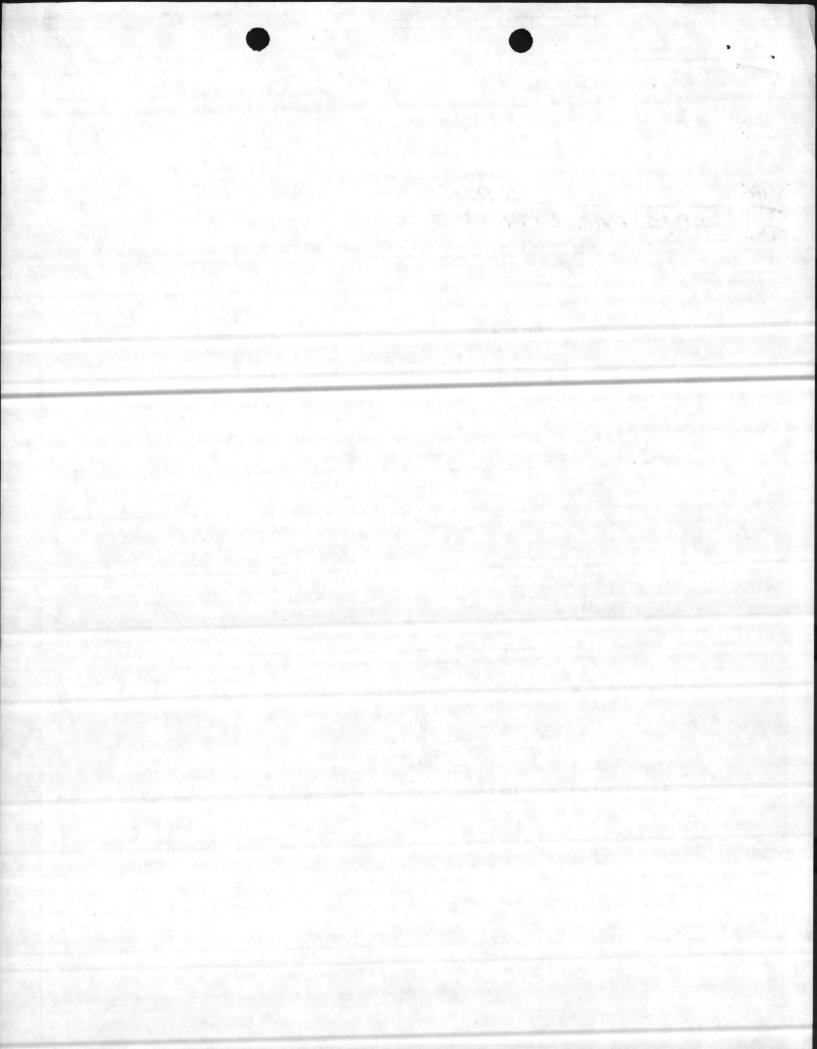
Encl:

(1) CG 2dMARDIV msg 161946Z Aug 1982

1. As requested by reference (a), the following information is provided. Base has issued guidance (reference (b)) concerning hazardous material disposal that satisfactorily applies to lithium batteries. Recently, 2dMARDIV issued a message (see enclosure (1)) describing more specific guidance for the handling, storage and disposal of lithium batteries. 2dFSSG readdressed the 2dMARDIV message and has therefore issued identical guidance. It is not considered necessary for the AC/S FAC to publish additional guidance at this time. NREAB will continue to monitor the subject disposal.

J. d. Woolin

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Memorandum

MAIN/DDS/th 6240 DATE: 31 Aug 1982

FROM Director, Natural Resources and Environmental Affairs Branch

TO Base Maintenance Officer

SUBJ Sitter Service Facility, Bldg 712; chemical contamination of

Ref:

(a) ABMO memo of 18 Aug 1982

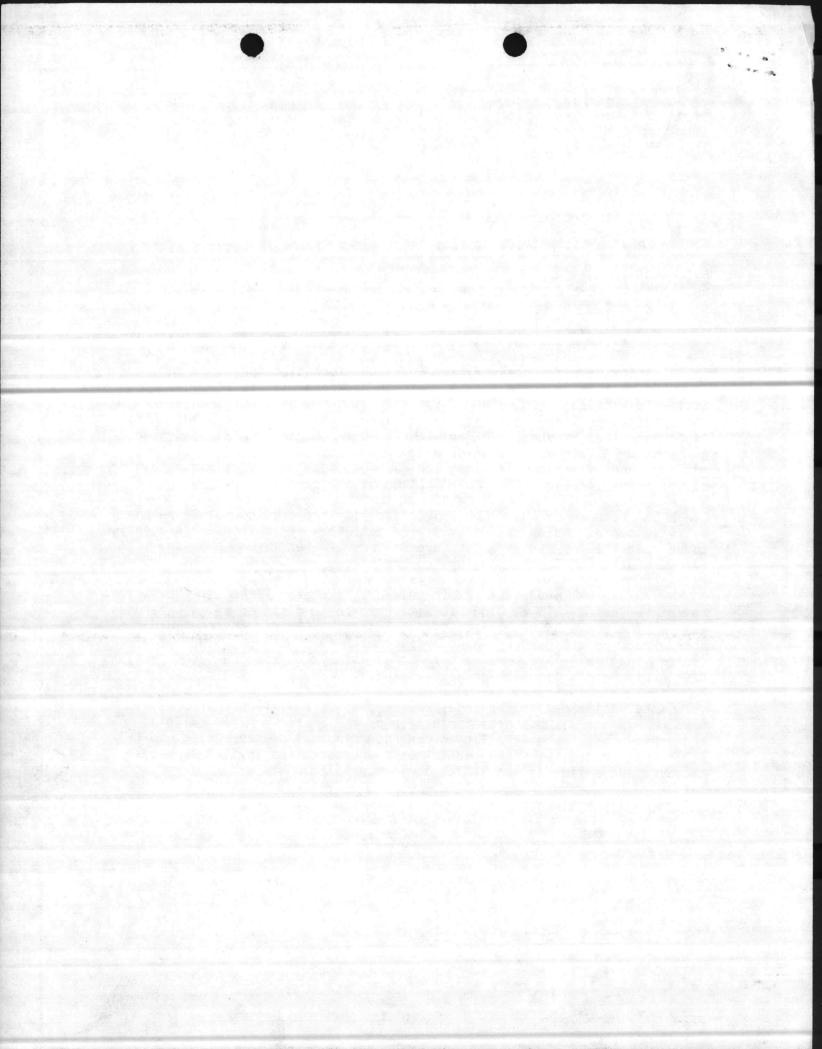
(b) AC/S FAC memo of 30 Jul 1982

(c) BO 6240.5

Encl: (1) Excerpts from Initial Assessment Study of Camp Lejeune of 9 Aug 1982

- 1. A review of references (a) and (b) and information contained in the attached package indicate that a decision has been made to reopen the Sitter Service Facility, Bldg 712 as soon as the upper four inches of contaminated soil in the playground area are removed and replaced. Also, it appears that Preventive Medicine Unit, Naval Regional Medical Center, guidance on how to accomplish decontamination of the subject facility and surrounding grounds is vague and fails to address post cleanup testing to determine adequacy of decontamination of the area.
- 2. NREAB recommends that the subject facility and grounds not be reopened until inspected and certified by appropriate Navy or public health agency to be suitable for use as a Day Care Center. The enclosure provides recommendation on testing at the subject site.
- 3. Mr. Jerry Wallmeyer, LANTDIV, advised by phone on 27 August 1982 that the contaminated soil at Bldg 712 will have to be disposed of as hazardous waste. There are no authorized disposal areas on base. The contaminated soil should be disposed of in accordance with reference (c). Mr. King advised that while DPDO may be able to assist with arranging a contract, base would be responsible for all funding.
- 4. State public health personnel have expressed a willingness to yisit Camp Lejeune to discuss decontamination of the Sitter Service building and grounds and the possibility of on base disposal of the subject soil. It is recommended the state public health personnel be invited to visit the base and advise on the Sitter Service problem.

I F WOOTEN





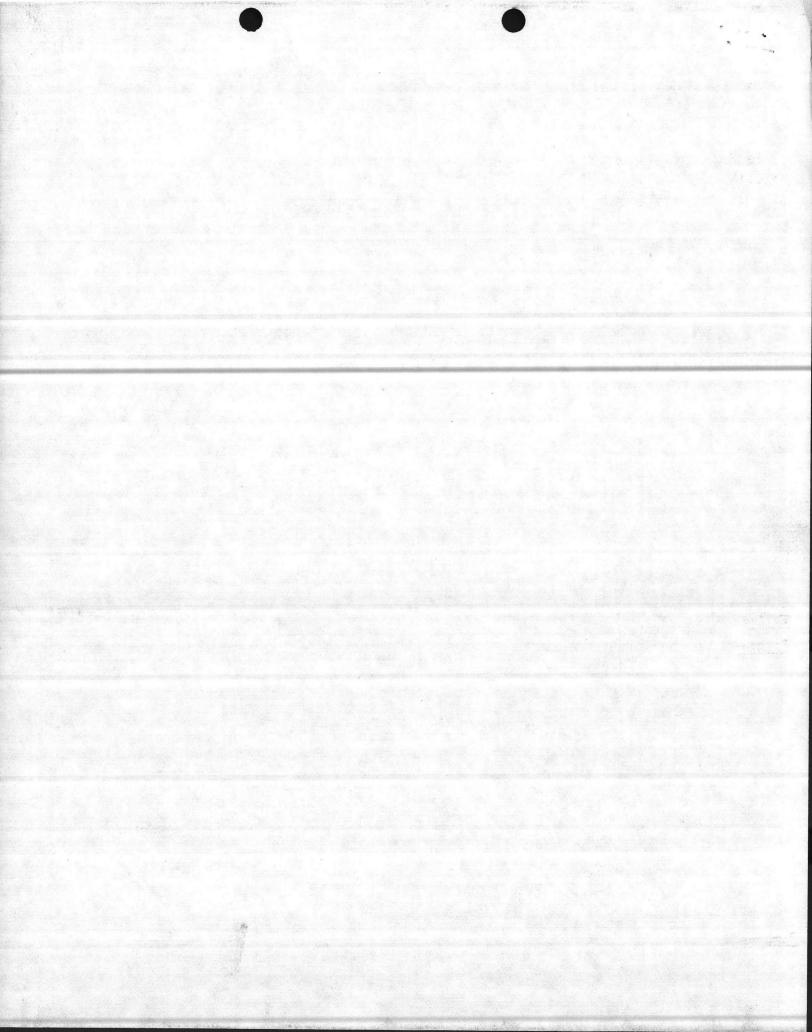
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Site No. 2: Nursery/Day-Care Center at Building 712

Problem:

This building was formerly the pesticide storage and handling facility. Residual pesticides in soils and the building may pose health risks to supervisory personnel and small children. Preliminary sampling results are shown in Table 2-2. An adjacent drainage creek (ditch) probably received washout and spills. A playground, an old wash pad, an old mixing area, and an old storage area are involved.

Goal:

Determine types and amounts of pesticides in the playground area and building, remainder of area, and in creek sediments. Determine if pesticides have migrated to nearby wells.

Approach:

Collect cores from three sites in the playground. Conduct a thorough inspection of other outdoor areas (both inside and outside fence) where mixing and handling occurred and obtain three additional soil samples. Examine building thoroughy and sample for pesticide residue or volatile Chlordane.

Sample creek sediments. Collect samples from water supply wells nearby.

Wells:

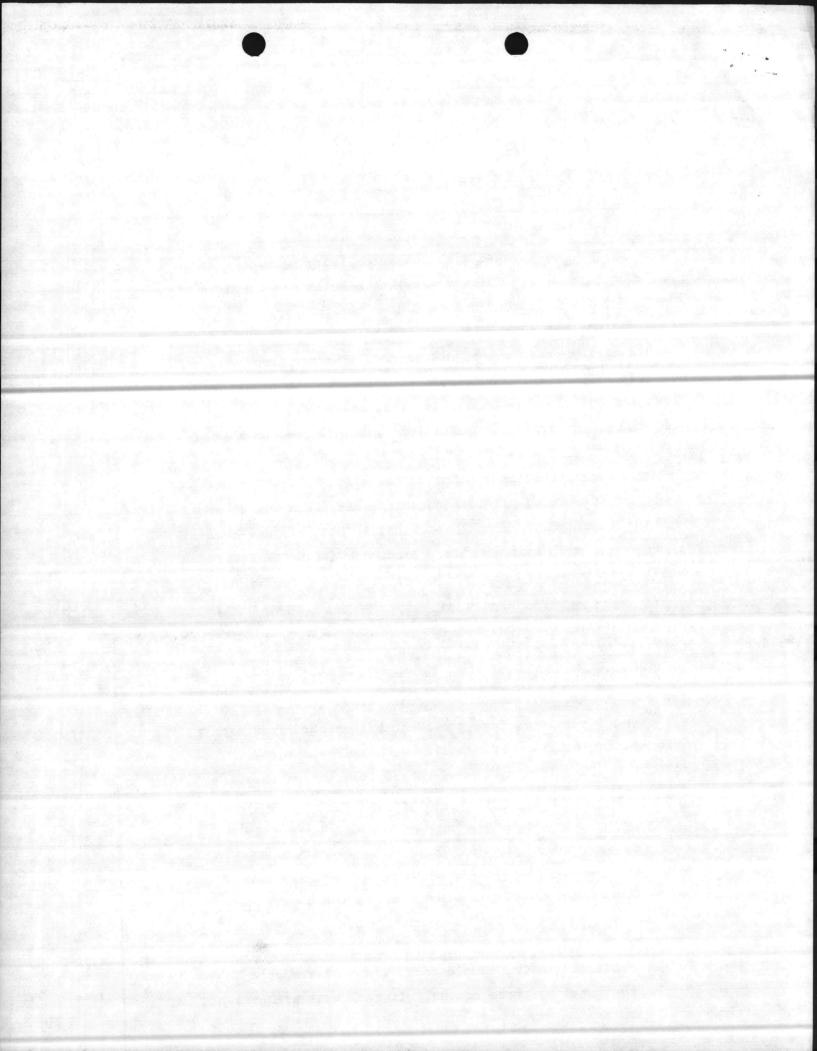
Existing Well Nos. 645, 646, 647, 616

Samples:

In playground, take 18-inch-deep cores of soils from three separate locations. In other outdoor areas (washing, mixing, and storing), take one 18-inch-deep core from each (See Section 4.4.1). From building, sample air for volatiles plus, from most used rooms, the residue samples from places likely to harbor fugitive substances, e.g., behind moldings. In creek, take sediment samples at four places: immediately downstream of site, about 1,400 feet downstream near Well No. 646, about 4,000 feet downstream above confluence with Overs Creek, and in Overs Creek upstream of creek widening at Northeast Creek. In wells, sample each well.

Frequency:

In sediments and soils, sample once. In wells, sample twice, separated by three months. If residuals are present,





then further intensive sampling to determine extent and distribution of contamination is needed.

Analyses:

For soils, sediments, well, and residues, test for organochlorine pesticides, including DDT-R, phenoxy alkanoic acid herbicides (including 2,4,5-T), malathion, diazinon. For air, test for volatile Chlordane.

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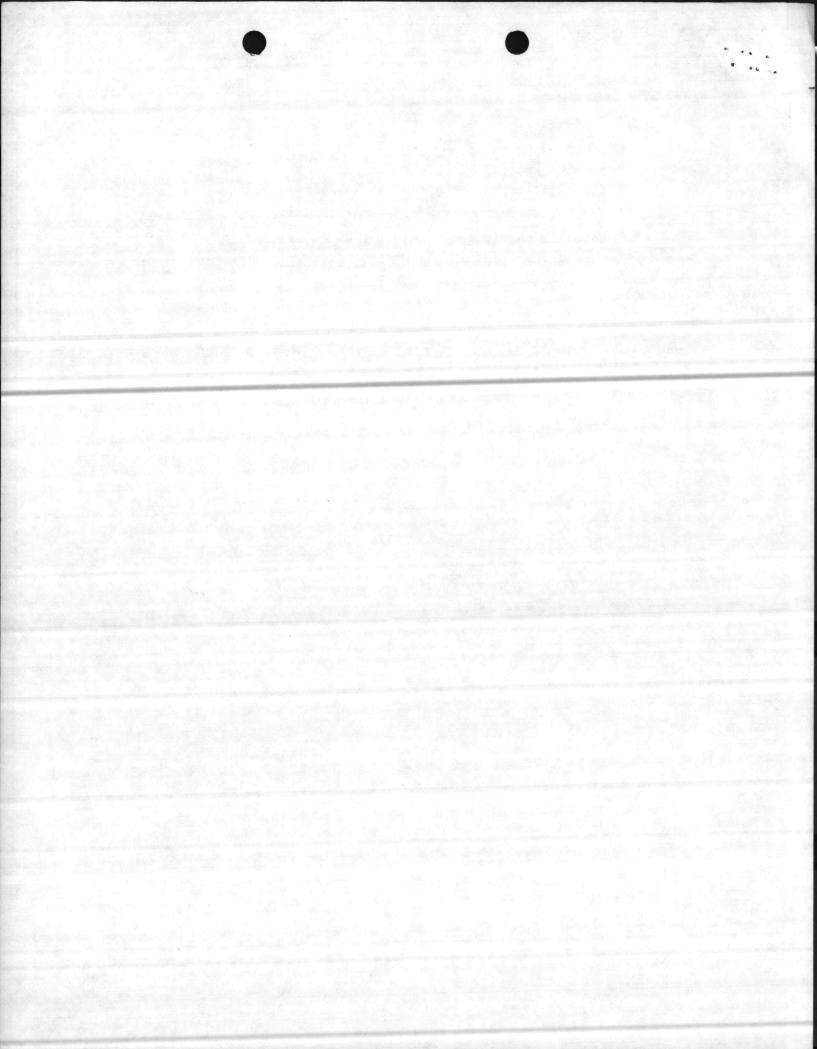
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Memorandum

MAIN/DDS/th 6240 DATE: 27 Aug 1982

FROM Director, Natural Resources and Environmental Affairs Branch

TO Base Maintenance Officer

SUBJ Reporting of Hazardous Material (HM)/0il

Ref: (a) BO 11090.1B (b) BO 6240.5

Encl:

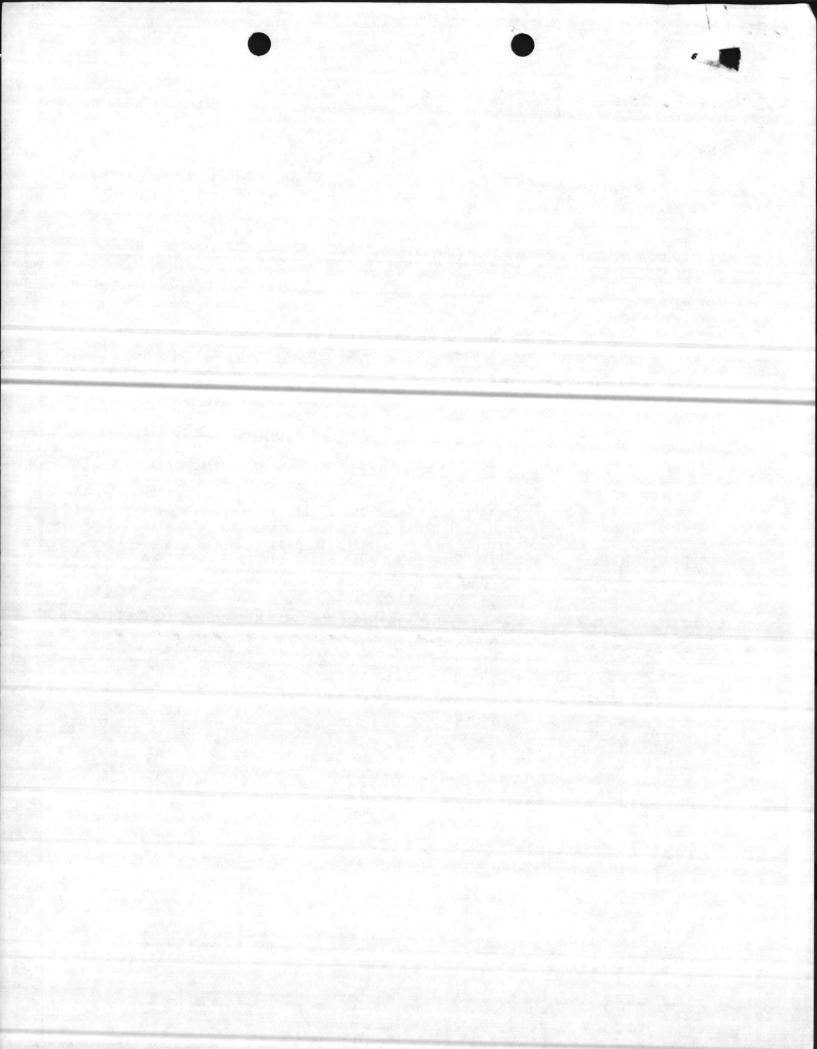
(1) CO MCAS(H) NR memo 222/MW/mc 6280 of 12 Aug 1982

(2) CO MCAS(H) NR msg 101715Z Aug 1982

1. The supervisory ecologist was advised of the mercury spill discussed in enclosure (1) during a discussion with MCAS(H) safety manager, Mary Wheat, on 3 August 1982. NREAB had become aware recently that MCAS(H) organizations were not following reporting procedures for subject spills as provided by references (a) and (b). After discussions with representatives of the MCAS(H) S-4 office, it was agreed that MCAS(H) would publish a clarification. Consequently, enclosure (2) was recently published.

2. MCAS(H) requested in paragraph 3 of enclosure (1) is consistent with the requirements of references (a) and (b). It is recommended that all Base Maintenance shops aboard MCAS(H) be advised to report HM and oil spills immediately to Base Fire Department (451-3333) and to Station S-4 Office or Officer of the Day as appropriate.

J. T. WOOTEN





UNITED STATES MARINE CORPS

MARINE CORPS AIR STATION (HELICOPTER) NEW RIVER, JACKSONVILLE NORTH CAROLINA 28545 Bno

222/MW/mc 6280 12 Aug 1982

From: Commanding Officer

To: Commanding General (AC/S, Facilities], Marine Corps Base,

Camp Lejeune, North Carolina 28542

Subj: Reporting of Hazardous Material Spills

Ref: (a) BO 11090,1B

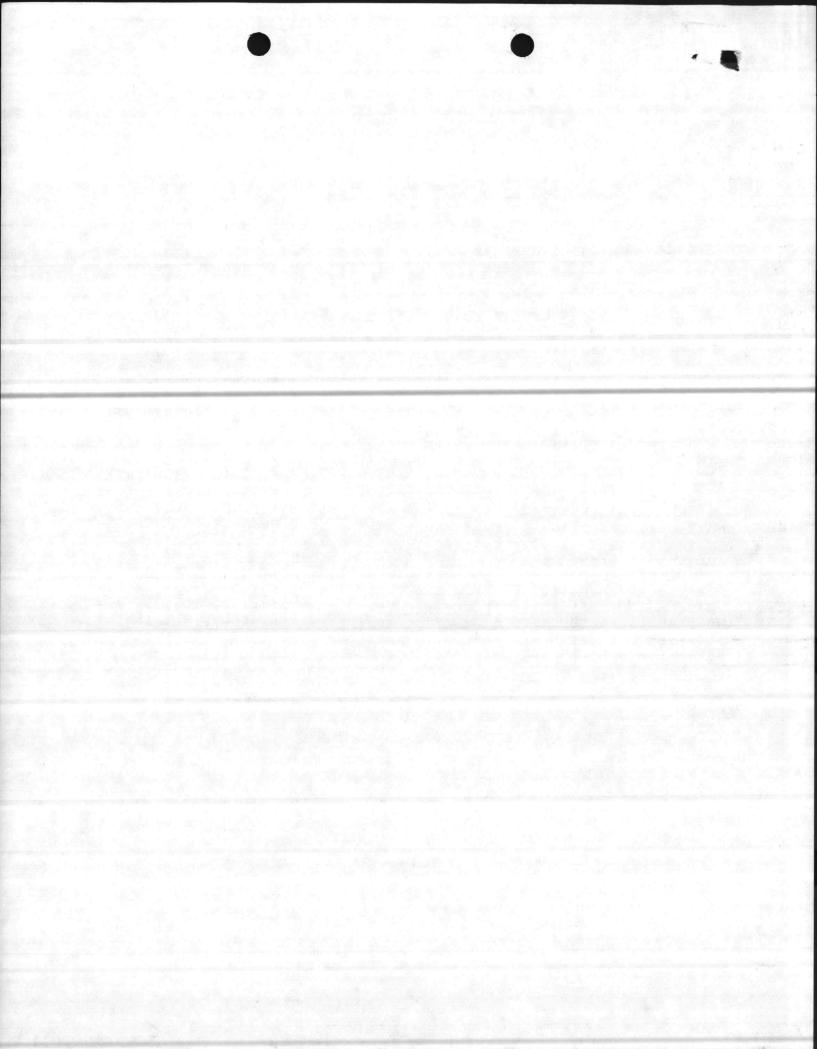
1. It has come to the attention of this Command that a mercury spill occurred within the Air Station heating plant on 19 July 1982. Personnel from the Base Safety Office and the Industrial Hygiene Section, Naval Regional Medical Center, responded to contain and clean up the spill.

- 2. While it is recognized that the heating plant is under the cognizance of the Base Maintenance Officer, it is perceived that being within the confines of the Air Station, the Commanding Officer, under the Resource Conservation and Recovery Act, remains responsible for hazardous waste operations and incidents on the Station.
- 3. It is requested that in the event future spills occur within Marine Corps Base operations aboard the Air Station, they be reported to the Station S-4 Office during working hours, or the Station Officer-of-the-Day after working hours, as set forth in enclosure (2) of the reference.

W. MARVEL

Copy to:

Base Maintenance Officer



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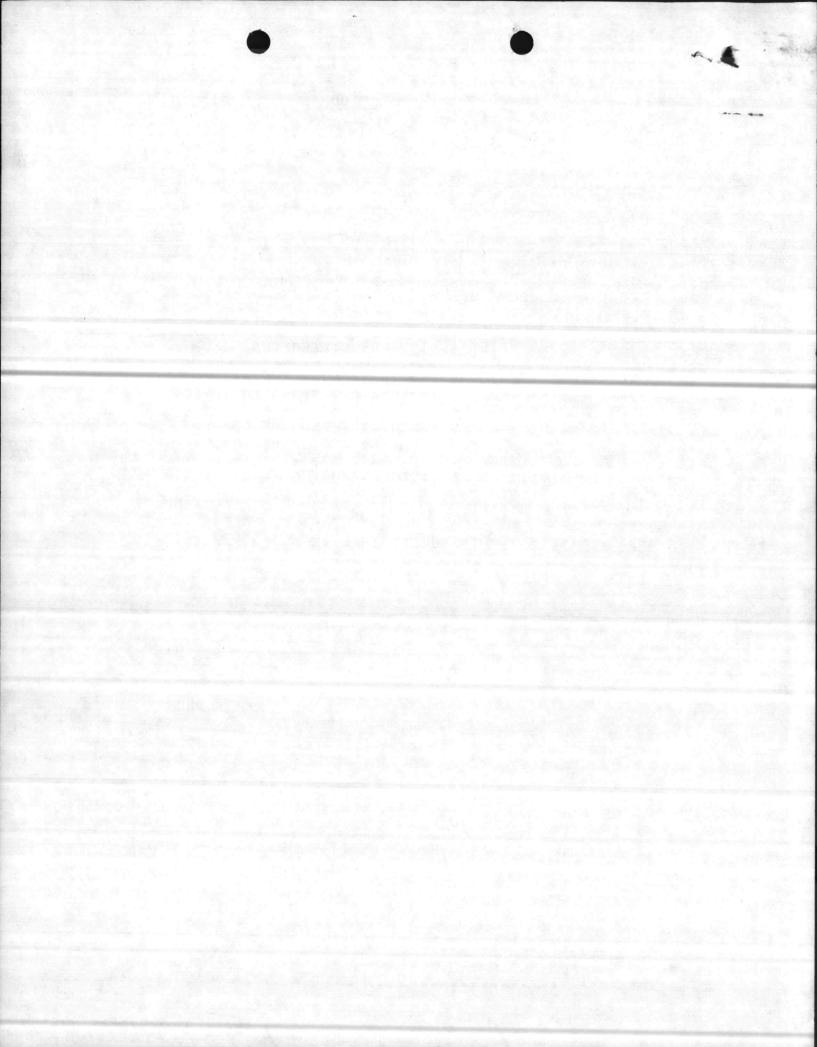
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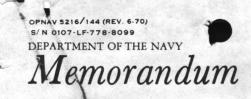
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ENCLOSURE (2)

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FROM Director, Natural Resources and Environmental Affairs Branch

TO Base Maintenance Officer

SUBJ Reporting of Hazardous Material (HM)/0il

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Encl: (1) CO MCAS(H) NR memo 222/MW/mc 6280 of 12 Aug 1982

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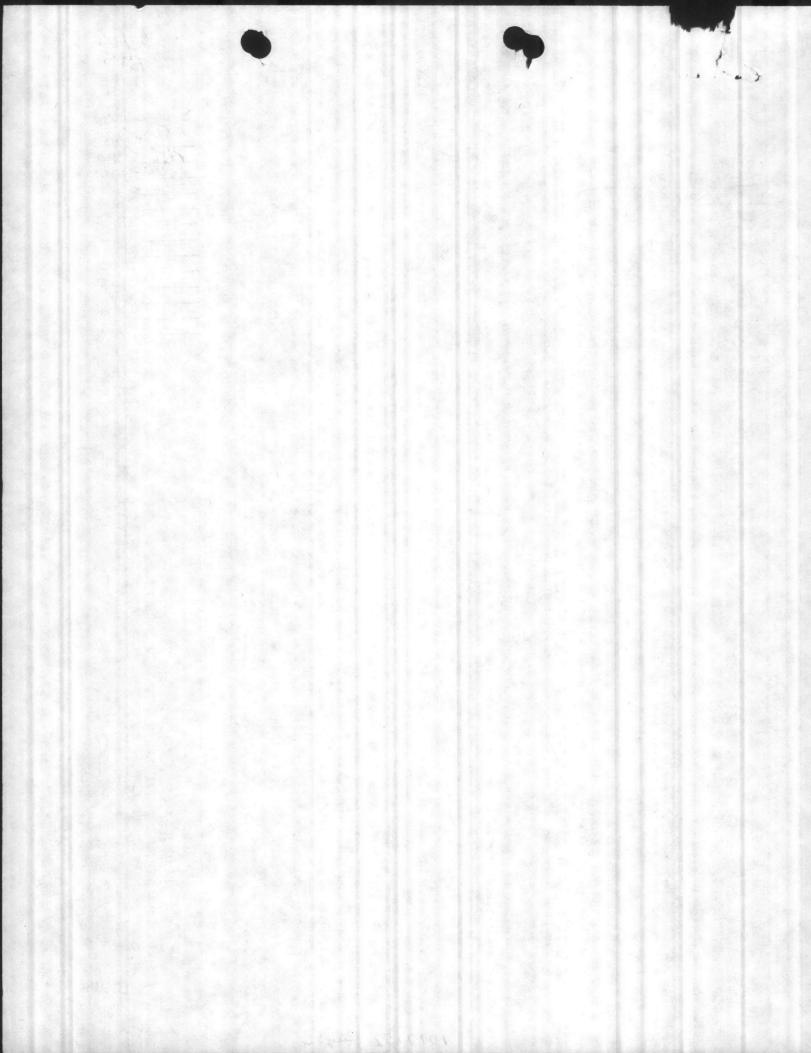
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ENCLOSURE (2)

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SUPPORT FUNCTION

15. Hazardous Material Environmental Management Program

MCB, CAMP LEJEUNE

Designate an activity focal point regarding hazardous material and waste management and disposal.

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Register with the Environmental Protection Agency and North Carolina (EPA & NC) as a long-terrestorer and transporter of all hazardous wastes generated by MCAS(H), New River, which are subject to the Resource Conservation and Recovery Act (RCRA). Obtain all permits required by EPA and NC for storage of hazardous wastes.

Complete Communication in the contraction of

Provide guidance/material support (including laboratory analytical assistance) to ensure proper short term (less than 90 days) storage, packaging and labeling of hazardous waste: Provide laboratory support to identify hazardous waste. Provide material and supervisory support required to repackage and label hazardous materials/waste, as well as inspectors to certify the adequacy of packaging and labeling required by hazardous materials/waste regulations.

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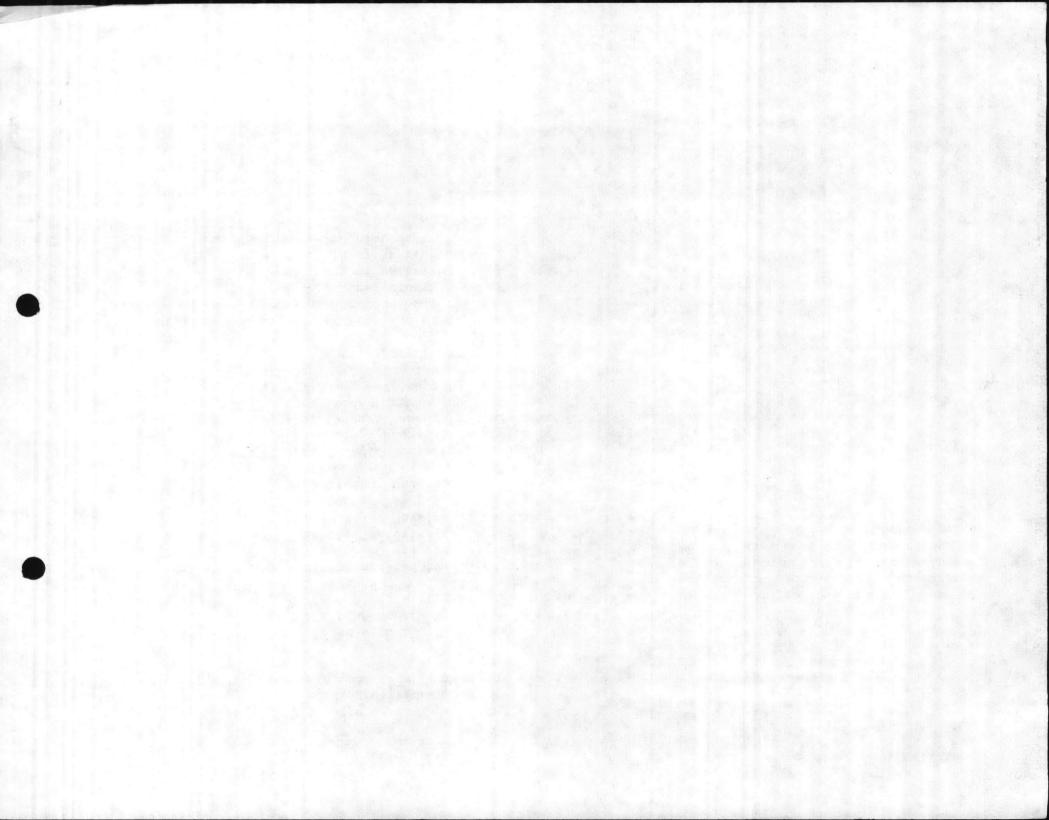
principal (2) (2) of Albertain and Albertain

MCAS(H), NEW RIVER

Designate a Hazardous Material Disposa Coordinator to serve as an activity focus point regarding hazardous material and waste management.

Register with EPA and NC as a hazardous waste generator. Will ensure that all units and tenants properly collect, segregate and containerize hazardous waste in accordance with EPA and NC regulations applicable to hazardous waste generators, utilizing materials and supervisors provided by MCB.

Ensure that hazardous wastes are properly identified. Provide short-term storage (less than 90 days) when required.



SUPPORT FUNCTION

Hazardous Majerial Environmental Management Program (continued)

MCB, CAMP LEJEUNE

Include MCAS(H), New River in an areawide oil hazardous material spill contingency plan. Furnish material support required and a basic level of personnel and equipment to handle routine spills. Make required reports to regulatory agencies and CMC. Provide an on-scene coordinator for spill containment and clean-up at MCAS(H), New River.

Provide long-term (more than 90 day) storage and final disposal of all hazardous wastes generated by MCAS(H), New River subject to RCRA, through facilities operated by and services provided by DPDO, Camp Lejeune, provided the wastes are properly packaged and documented. Maintain appropriate records of long-term storage and disposal of hazardous wastes accepted from MCAS(H), New River through the interservice support agreement with DPDO, Camp Lejeune, and submit all related reports required of hazardous waste storers and transporters to EPA and NC. Provide technical assistance to MCAS(H), New River on record-keeping reporting.

Provide technical assistance and environmental protection support to MCAS(H), New River regarding spill prevention control and countermeasure plan (SPCC) and hazardous material disposal.

Provide training for key personnel at MCAS(H), New River in hazardous material and hazardous waste management.

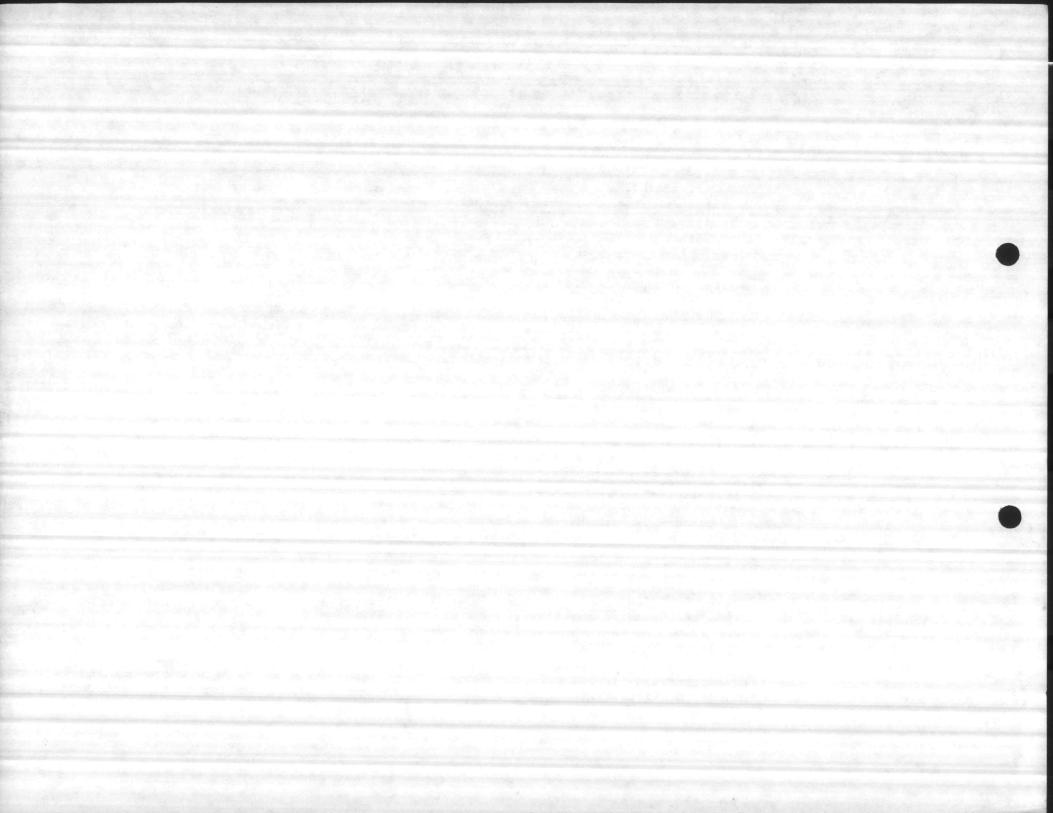
MCAS(H), NEW RIVER

Assist, as required, in implements an area-wide oil/hazardous material spill contingency plan, including to not limited to furnishing manpower requested by on-scene coordinator for spill containment and clean-up at MCASC New River. Conduct investigations of spills and submit appropriate reports thereof to MCB, Camp Lejeune.

Prepare all documents required to transport and deliver wastes to long-term storage and disposal. Maintain appropriate records of waste generation and shipments and submit all reports required of hazardous waste generators to the EFA and NC.

Develop and implement an SPCC plan for hazardous waste generation and hazardous material and waste storage sites MCAS(H), New River.

Provide training for tenants and units at MCAS(H), New River in hazardous material/hazardous waste management.



Support Function

Real Property Maintenance (contd)

MCB Camp Lejeune

Formulate and execute a long range natural resources management and environmental control program. Include a forest management program for timber production and harvest, site preparation, prescribed burning, forest pest control, and forest fire control: a fish and wildlife program for control of fishing and hunting. fish pond management, wildlife habitat manipulation and protection of rare and endangered species; and environmental protection program which provides for a system of collection and disposal of waste petroleum products, monitoring for water and air pollution.

Special requirements required for hunting and fishing on or near MCAS(H) will be incorporated in all directives and programs.

MCAS(II) New River

Furnish special requirements for incorporation into the masser resources management and environmental program, as appropriate.

Provide station Environmental Affairs
Officer (collateral duty assignment)
liaison with and input to MCB Camp
Lejeune for natural resources management and environmental affairs control
programs. The station Environmental
Affairs Officer will assist the MCB
Camp Lejeune Environmental Affairs
Officer in a monitoring capacity
in the area of MCAS(II) New River,
Camp Geiger and the Verona area.

The station Environmental Officer will furnish his Station Game Warden to MCB, Camp Lejeune for utilization in a monitoring and control capacity to satisfy requirements existing in the MCAS(H) New River/Camp Geiger/Verona area.



MEMORALDUM OF UNDERSTANDING between Brigadier General D. B. BAFKER, Commanding General, Marine Corps Base, Camp Lejeune, North Carolina, and Colonel D. C. HEIM, Commanding Officer, Marine Corps Air Station (H), New River, Jacksonville, North Carolina.

Ref: (a) MCB CLNC/MCAS(H) NR Logistic Support Consolidation Agreement of 29 April 1977

1. <u>Background</u>. Since the promulgation of reference (a), certain questions have been raised concerning the responsibilities and roles of the two commands concerning the Wildlife Management Program at Marine Corps Helicopter Outlying Landing Field, Oak Grove. In order to resolve those questions, the below signed parties hereby agree to the following points in order to prevent misunderstandings.

2. Understandings

- a. Marine Corps Air Station (H) will assign and supervise game wardens at Marine Corps Air Station (H) and Marine Corps Helicopter Outlying Landing Field, Oak Grove.
- b. Marine Corps Air Station (H), New River is recognized as the enforcement agency for the consolidated fish and wildlife program at Marine Corps Air Station (H), New River and Marine Corps Helicopter Outlying Landing Field, Oak Grove.
- c. Marine Corps Air Station (H) shall furnish the Marine Corps Base, Camp Lejeune, with a copy of the action taken on all fish and wildlife citations.

D. B. BARNER, BGen, USMC

Commanding General

Marine Corps Base

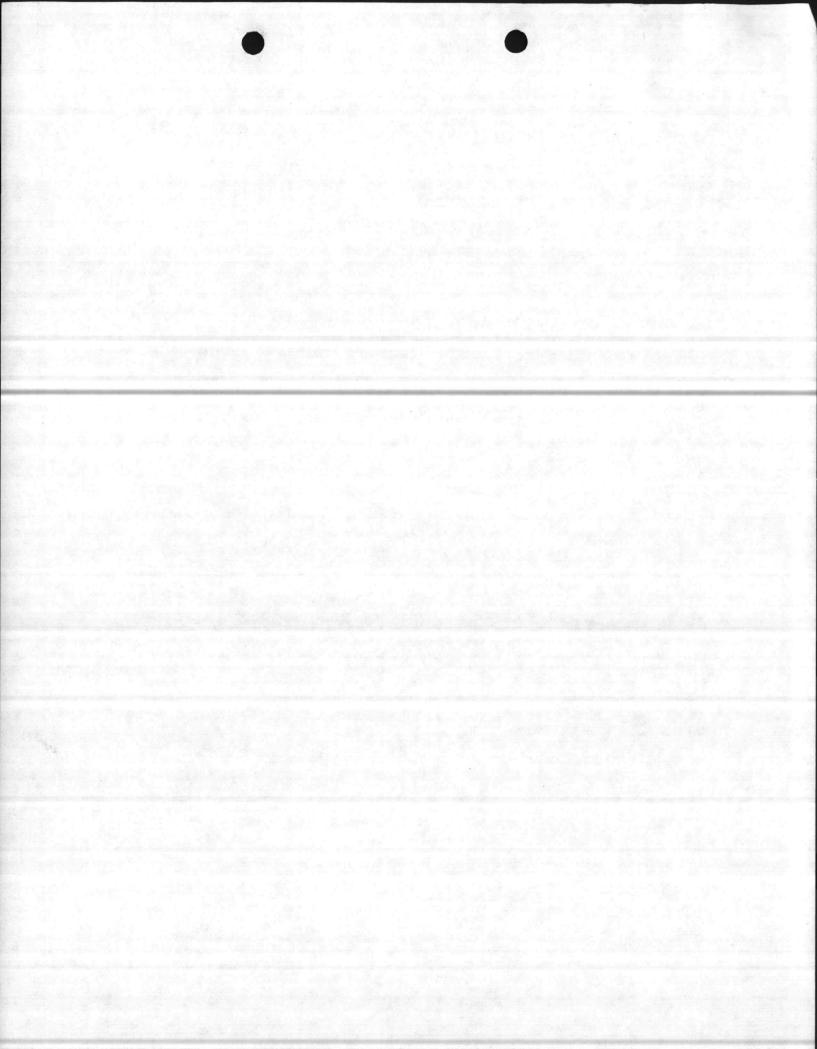
Camp Lejeune, North Carolina

D. C. HEIM, Col, USAC

Commanding Officer

Marine Corps Air Station (H), New River

Jacksonville, North Carolina



NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS BRANCH BASE MAINTENANCE DIVISION MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA 28542

7-24-82 Date

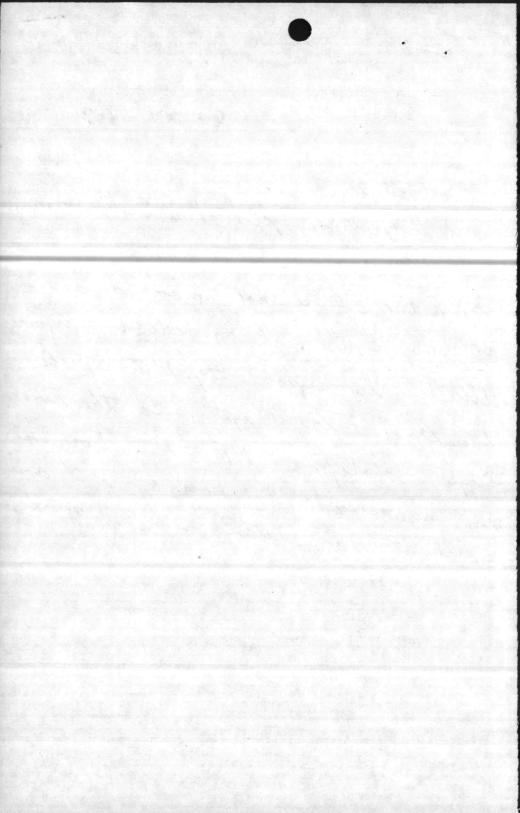
From: Director

To: ABMO

Subj: Hay, Mat. Spill at air Station Heating

1. Plant.

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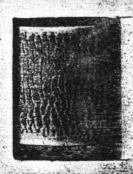


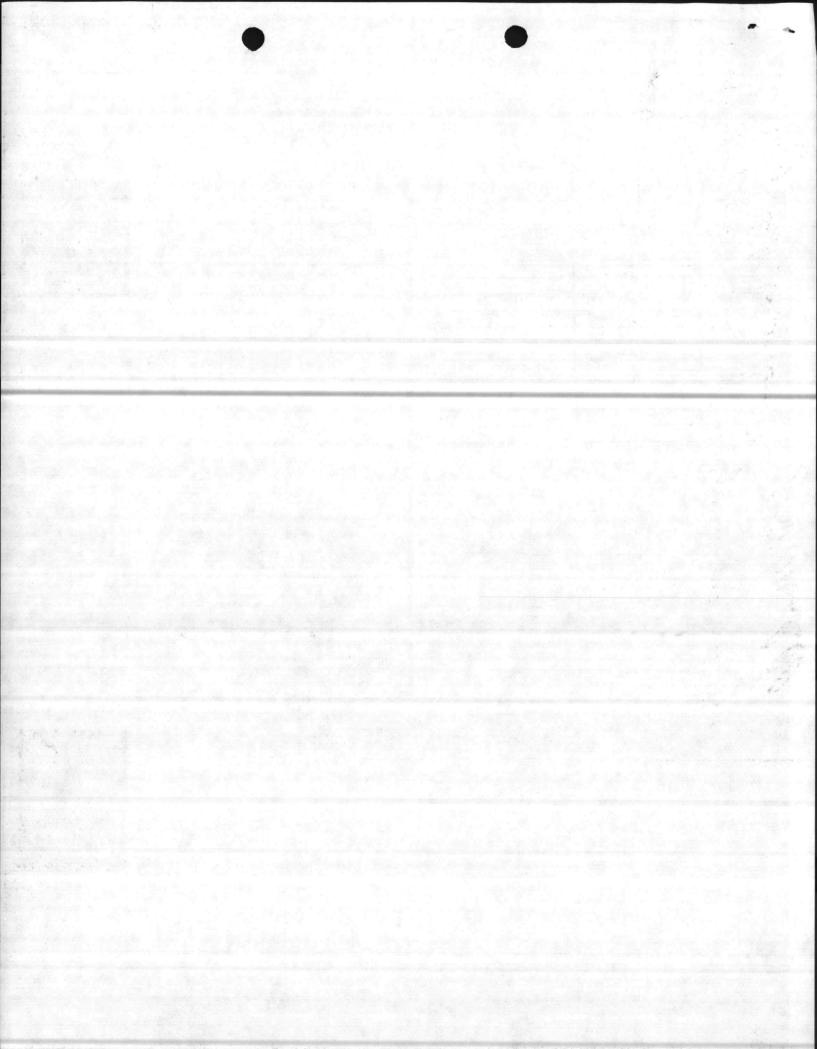
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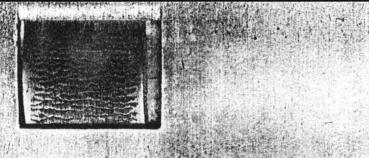
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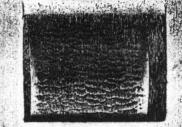
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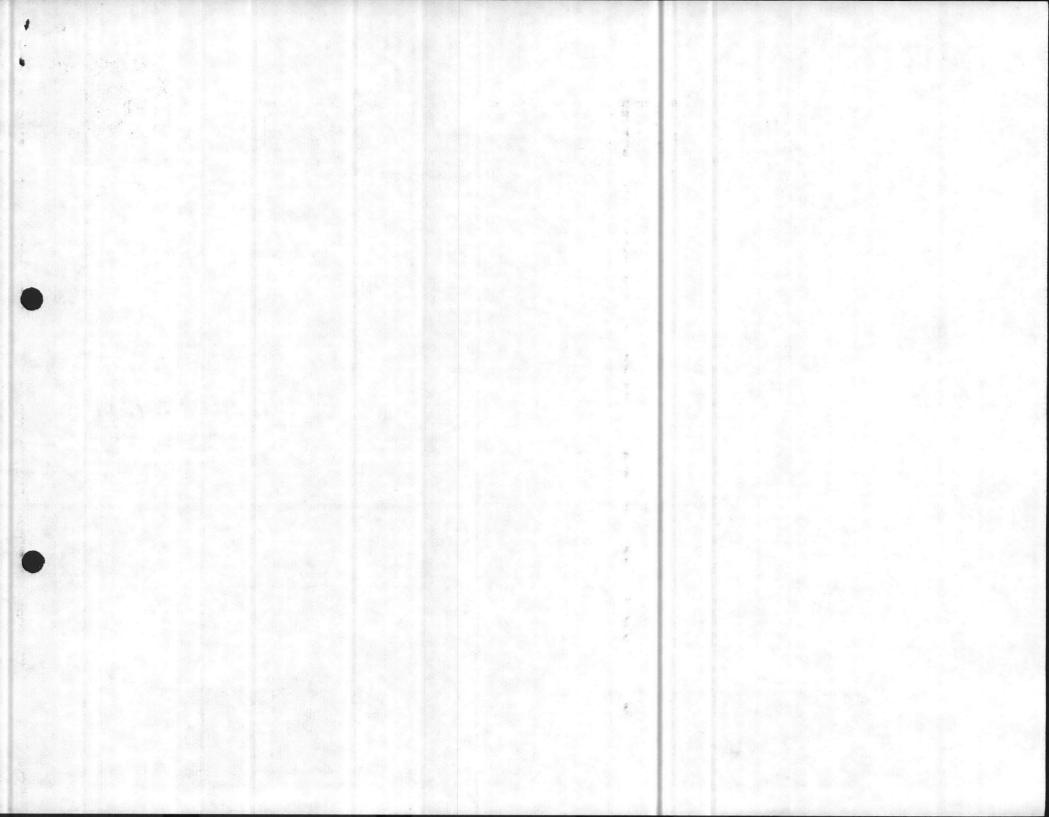
Memorandum

FROM: AC/S FAC

Bmo

SUBJ: Reporting of HW Spill

RON: I was under the impression that we had this total responsibility for both Base and meas and if anything they should notify ses of any spills. Can upon enlighten me on who is doing what to whom? I I manhall





UNITED STATES MARINE CORPS

MARINE CORPS AIR STATION (HELICOPTER) NEW RIVER, JACKSONVILLE NORTH CAROLINA 28545 Bno

222/MW/mc 6280 12 Aug 1982

From: Commanding Officer

To: Commanding General (AC/S, Facilities], Marine Corps Base,

Camp Lejeune, North Carolina 28542

Subj: Reporting of Hazardous Material Spills

Ref: (a) BO 11090,1B

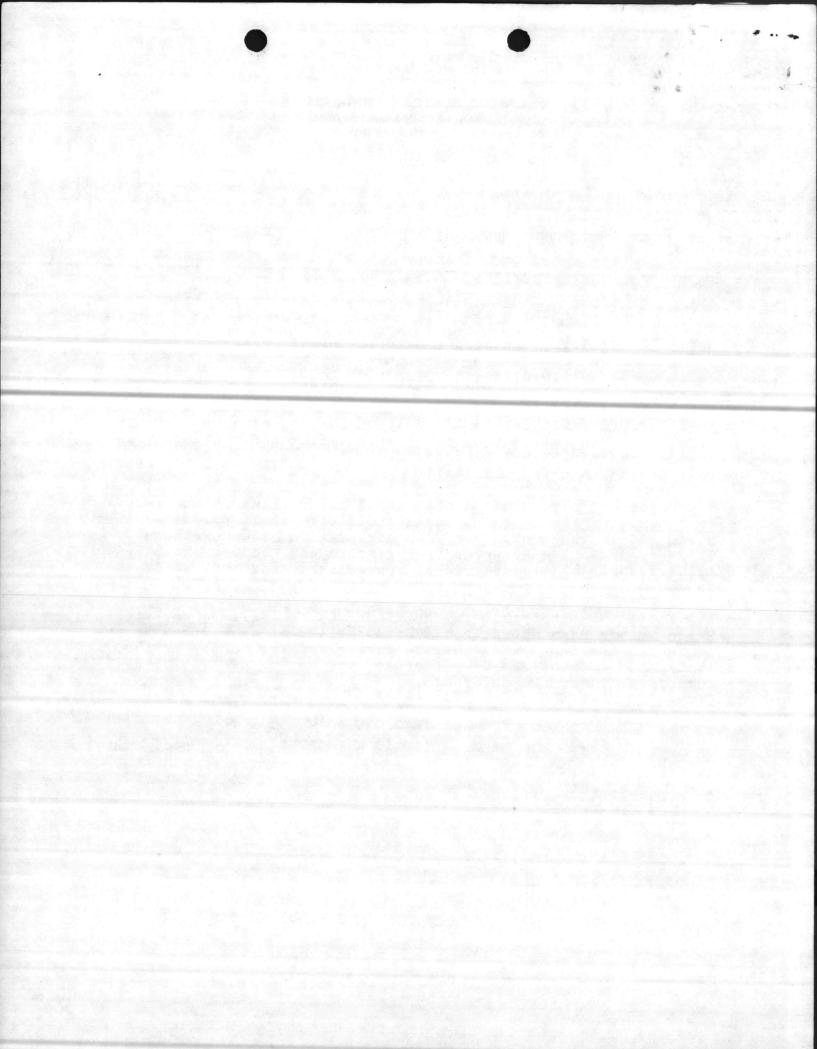
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W, MARVEI

Copy to: Base Maintenance Officer



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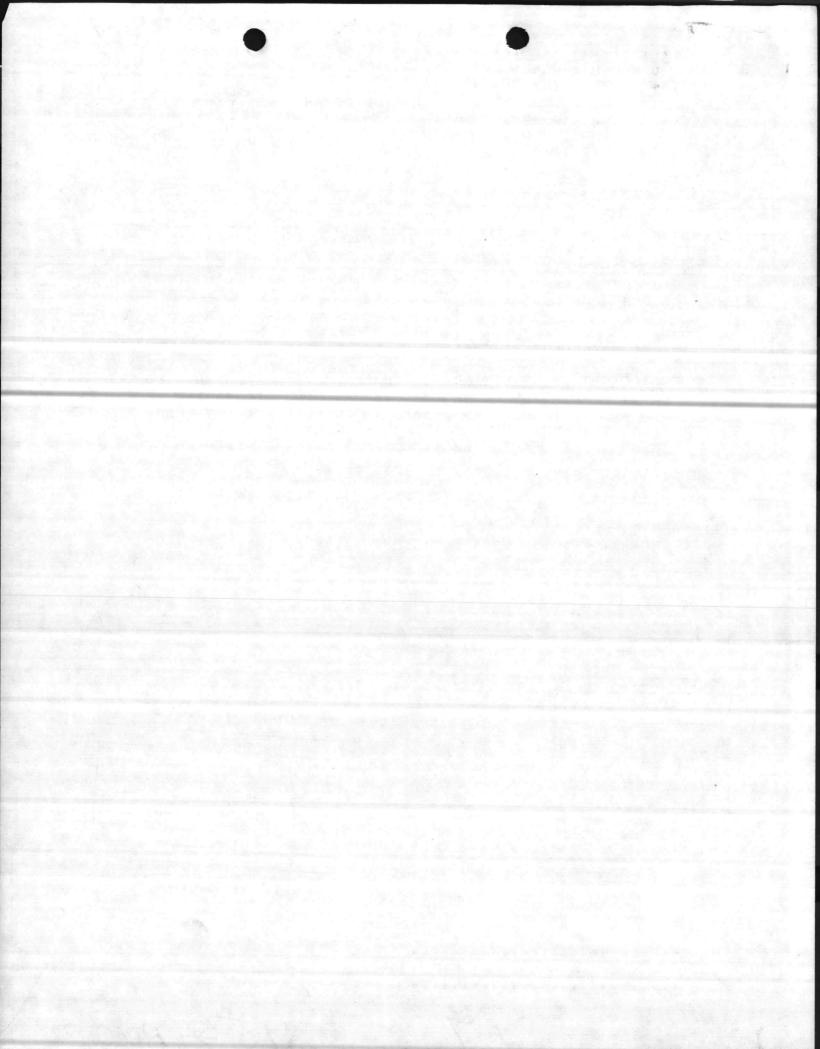
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Secretary

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A 80 11000.1P

SUBJ: REPORTING OF HAZARDOUS MATERIAL (HM) OR OIL SPILLS

1. IAN THE GEF. ALL SPILLS OF GIL OR HM. TO INCLUDE THOSE OCCURPING IN AIRCRAFT OPERATING APEAS . WILL BE IMMEDIATELY PEPORTED TO THE BASE FIRE DEPARTMENT DISPATCHER, 451-3333. THE REPORT SHALL INCLUDE LOCATION. SUBSTANCE SPILLED, AND THE APPROXIMATE AMOUNT SPILLED. 2. SPILLS OCCURRING IN ATROPART OPERATING AREAS WILL BE REPORTED IMMEDIATELY THEREAFTER TO THE CRASH CREW, EXT. 6373, OR IN OTHER AREAS. TO THE STATION S-4 OFFICER, EXT. 6686, DURING MORMAL MORKING HOURS. OR TO THE STATION OFFICER OF THE DAY. FXT. 6111: CFTER

PAGE 02 PULSSGE3221 UNCLAS PRAL HORKING HOURS. REQUEST WIDEST DISSEMINATION OF THIS MESSAGE.

#3221

PT

NNNN INFO:

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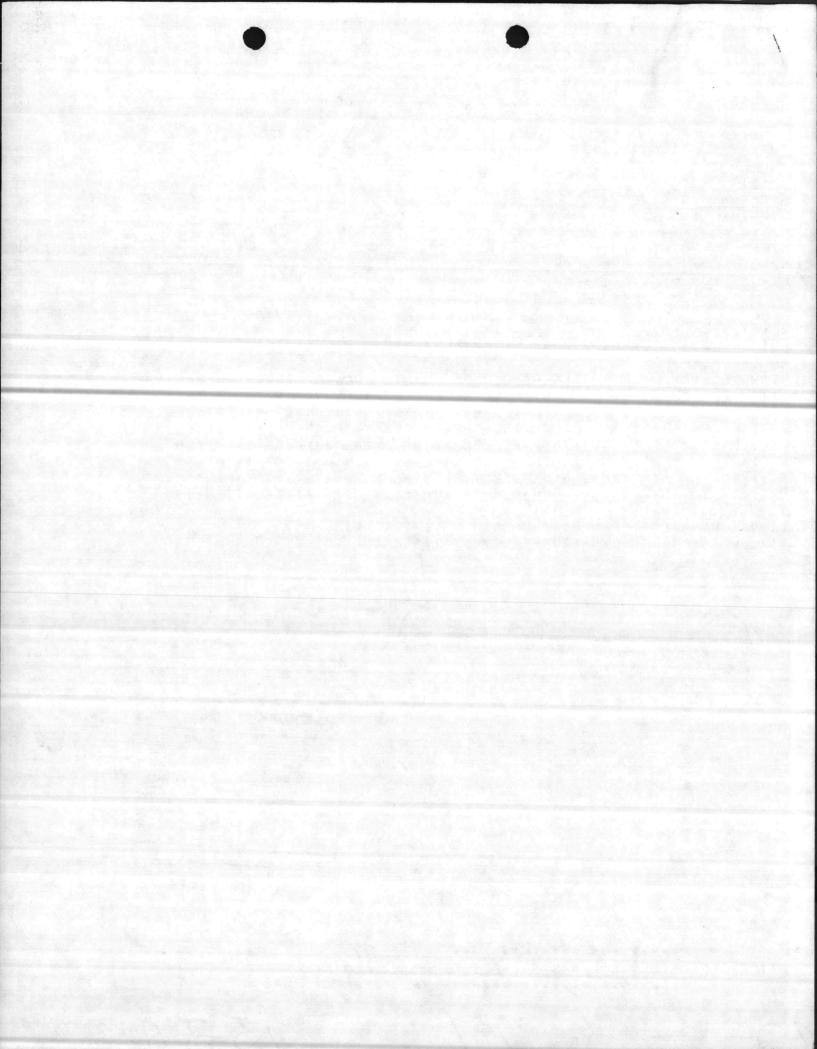
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11 AUG 1982

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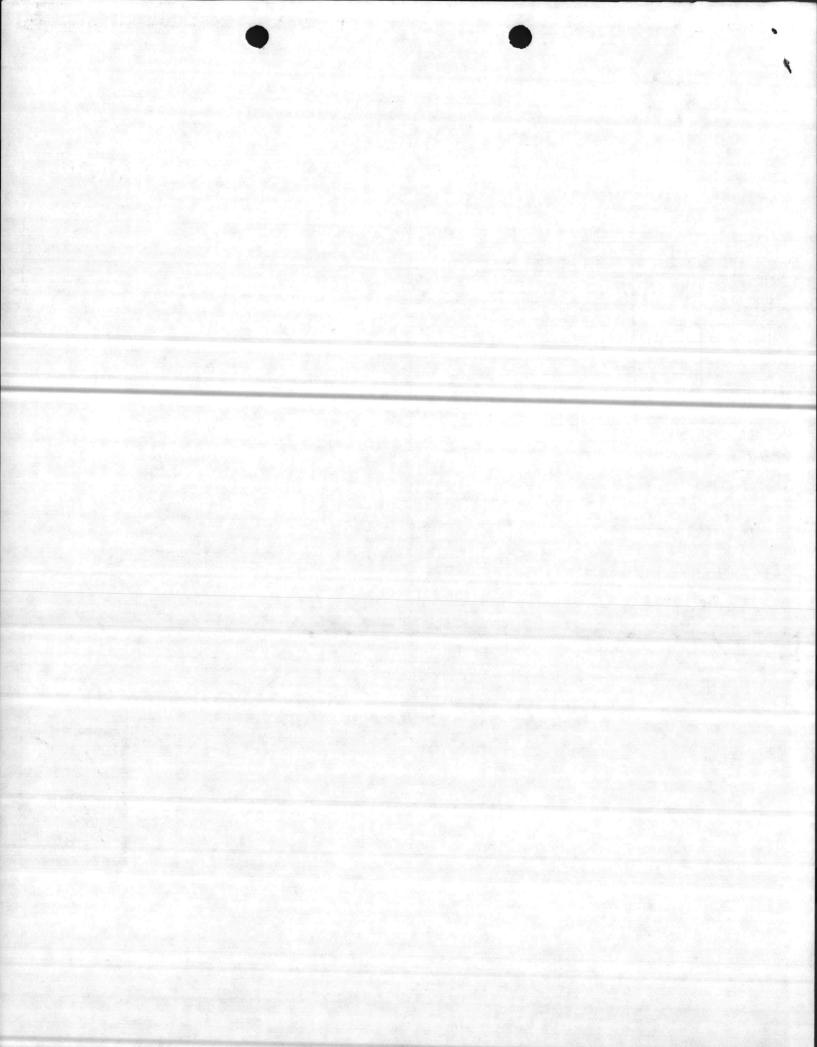
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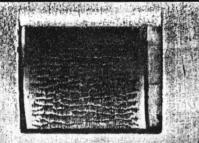
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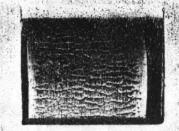
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OPNAV 5216/144 (REV. 6-70) 5/N-0107-778-8097 DEPARTMENT OF THE NAVY

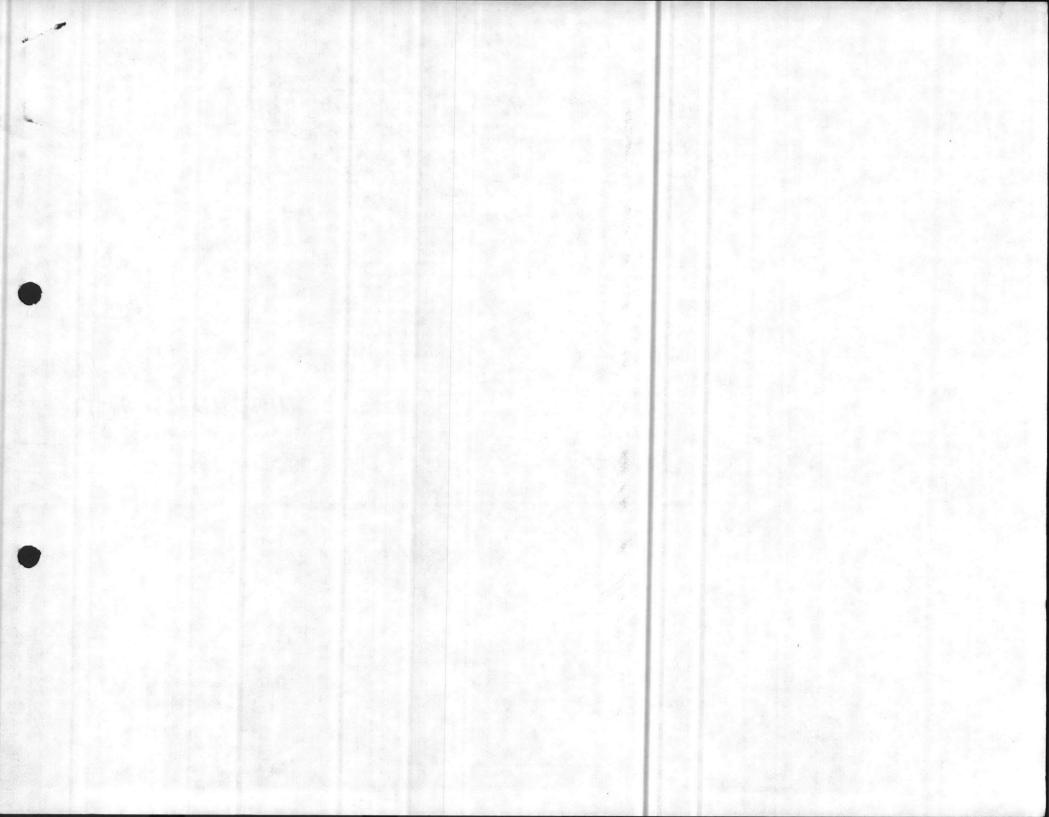
Memorandum

FROM: Ads FAC

TO: BMO

SUBJ: Reporting of HW Spills

RON: I was under the impression that we had this total responsibility for both Base and mens and if anything they should notefy set of any spills. Can upon enlighten me as who is doing what to whom? I I mouth





UNITED STATES MARINE CORPS

MARINE CORPS AIR STATION (HELICOPTER) NEW RIVER, JACKSONVILLE NORTH CAROLINA 28545 Bno

222/MW/mc 6280 12 Aug 1982

From: Commanding Officer

To: Commanding General (AC/S, Facilities], Marine Corps Base,

Camp Lejeune, North Carolina 28542

Subj: Reporting of Hazardous Material Spills

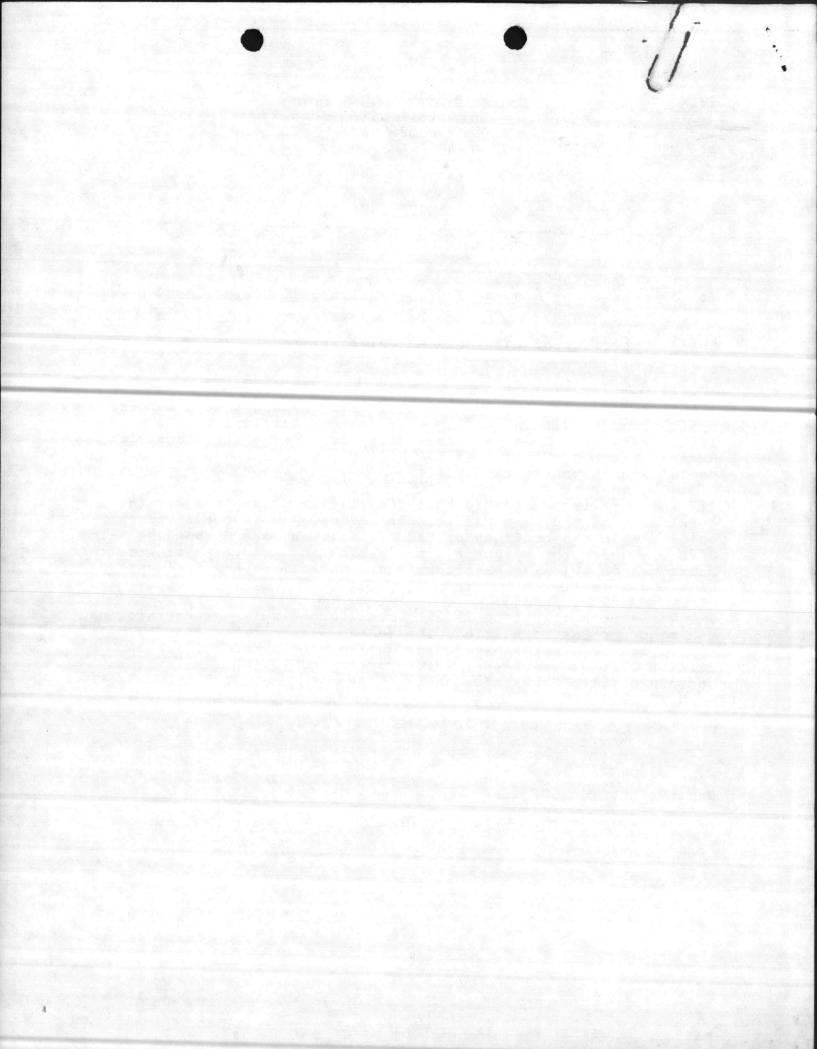
Ref: (a) BO 11090,1B

1. It has come to the attention of this Command that a mercury spill occurred within the Air Station heating plant on 19 July 1982. Personnel from the Base Safety Office and the Industrial Hygiene Section, Naval Regional Medical Center, responded to contain and clean up the spill.

- 2. While it is recognized that the heating plant is under the cognizance of the Base Maintenance Officer, it is perceived that being within the confines of the Air Station, the Commanding Officer, under the Resource Conservation and Recovery Act, remains responsible for hazardous waste operations and incidents on the Station.
- 3. It is requested that in the event future spills occur within Marine Corps Base operations aboard the Air Station, they be reported to the Station S-4 Office during working hours, or the Station Officer-of-the-Day after working hours, as set forth in enclosure (2) of the reference.

W, MARVEL

Copy to: Base Maintenance Officer



MAIN/JIW/th 6240 AUG 2 5 1982

Commanding General From:

Commanding Officer (Attn: Preventive Medicine Officer) To:

Naval Regional Medical Center, Camp Lejeune, North Carolina 28542

Subj: Hazardous Waste Disposal at Camp Lejeune

Encl: (1) Initial Assessment Study of Marine Corps Base, Camp Lejeune. North Carolina of August 1982

1. The enclosure provides information on hazardous material disposal sites at Camp Lejeune and is submitted for your review from a public health position. Particular attention is invited to the Nursery/Day Care Center comments. figure 6-4, page 6-39.

> R. F. CALTA By direction

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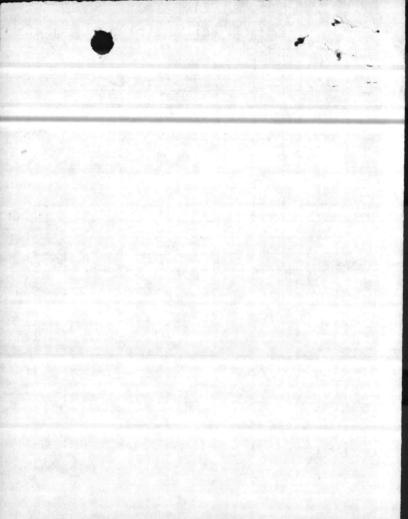
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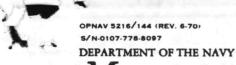
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COMMENTS:

MREA, What about the one





Memorandum

FROM: AC/S FAC

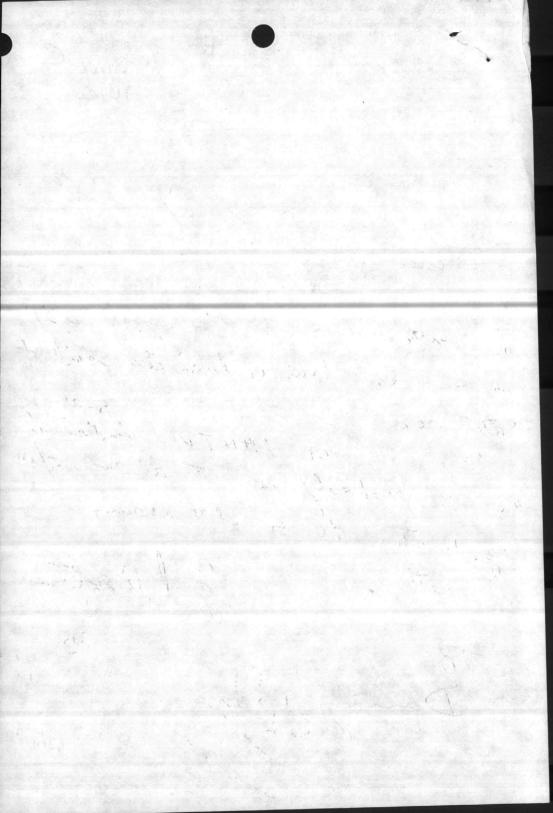
TO: BMO

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NATURAL RESOURCES AND ENVIRONENTAL AFFAIRS BRANCH BASE MAINTENANCE DIVISION
MARINE CORPS BASE Bmo = CAMP LEJEUNE, NORTH CAROLINA 28542 ABMO BUZ 8-23-82 From: Director To: BMO Subj: Hay. Mat. Disposal attached for your info. Mr King DPDO Comp Lijeme indicated he could not find disposal of DDT - - Chlordane contaminated soil at LANTDIU indicated Sitter service. Levry Wallmujer we will probably have to dispose of or is still looking into hay worth. He J d Woote the matter. To Damy DD



From, DPDO (Mr King)

TO MR. ShAPEK

COPY

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

WASHINGTON, D. C. 20307

MANPOWER RESERVE AFFAIRS AND LOGISTICS

DEFENSE ENVIRONMENTAL QUALITY PROGRAM POLICY MEMORANDUM (DEQPPM) 81-3

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (IL&FM)
ASSISTANT SECRETARY OF THE NAVY (MRA&L)
DEPUTY UNDER SECRETARY OF THE NAVY
ASSISTANT SECRETARY OF THE AIR FORCE (MRA&I)
ASSISTANT SECRETARY OF THE AIR FORCE (RD&L)
DIRECTORS OF DEFENSE AGENCIES

SUBJECT: Department of Defense Hazardous Material Disposal Policy

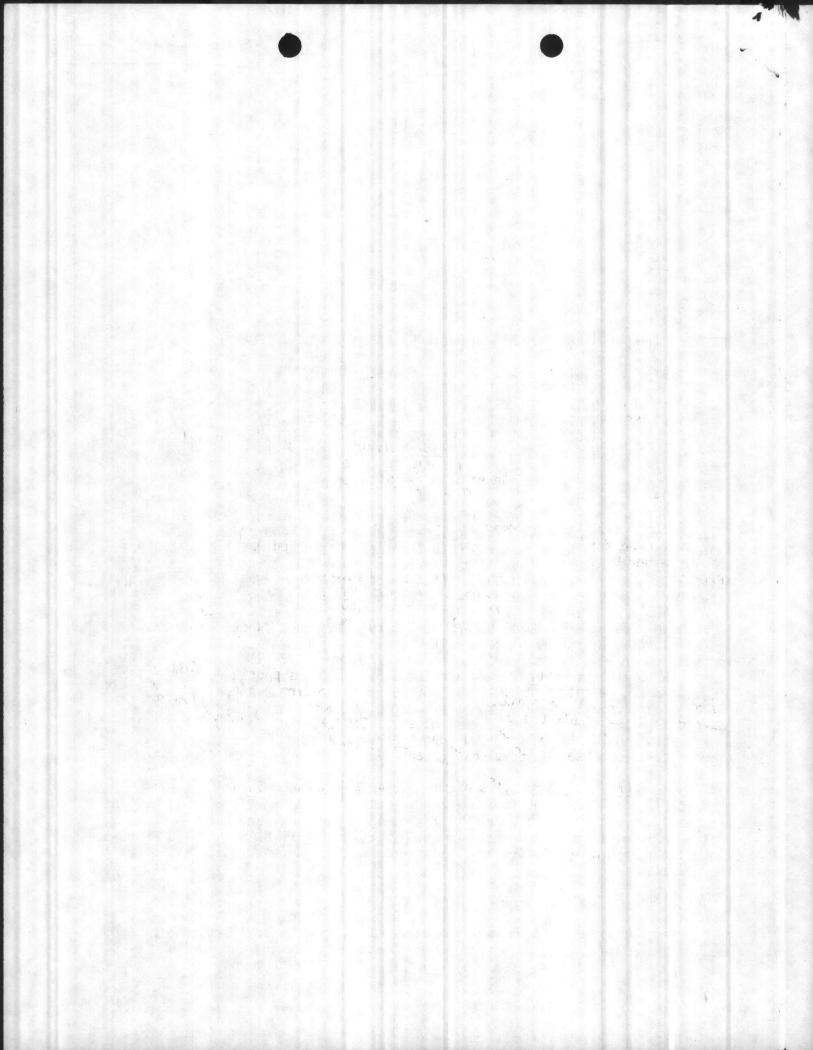
PURPOSE: This is to provide additional Department of Defense (DoD) policy guidance on the disposal of hazardous materials. This memorandum supplements policy published in DEQPPM 80-5, "Department of Defense Material Disposal Policy," of May 13, 1980; DEQPPM 80-8, "RCRA Hazardous Waste Management Regulations," of October 21, 1980; and DEQPPM 80-9, "Department of Defense (DoD) Management of Polychlorinated Biphenyls (PCB's) and PCB Items," of November 10, 1980.

BACKGROUND: On May 13, 1980, DEQPPM 80-5 was published to provide DoD policy on the disposal of hazardous materials. That policy designates the Defense Logistics Agency (DLA) as responsible for the disposal of all hazardous materials except those that specifically remain the other DoD components' responsibilities. On October 21, 1980, DEQPPM 80-8 was published to provide DoD policy on the implementation of the hazardous waste management provisions of the Resource Conservation and Recovery Act (RCRA) of 1976. Finally, on November 10, 1980, DEQPPM 80-9 was published to provide additional DoD guidance on the proper handling, storage, and disposal of polychorinated biphenyls (PCB's) and PCB items.

On March 12, 1981, DLA and the Defense Property Disposal Service (DPDS) briefed the Hazardous Materials Disposal Policy Steering Committee and Working Committee on their progress to implement DEQPPM 80-5, DEQPPM 80-8, and DEQPPM 80-9. The actions, responsibilities and assignments which follow were identified at that briefing.

POLICY: The DoD policy is:

DoD components will fund for hazardous substance spill residue cleanup, spill site restoration, and proper identification, packaging and labeling of



spill residue. DLA should program only for disposal of spill residues for fiscal year 1983 and later years.

DLA will take the lead in a coordinated DLA/DoD component effort to determine conforming storage project requirements to support the DLA assigned disposal mission.

ACTION REQUIRED: DoD components will take the following actions:

The DoD component which has a hazardous material spill will continue to fund for spill cleanup, spill site restoration, and proper identification, packaging, and labeling of spill residue. DLA should program only for disposal of spill residues for FY 83 and later years. DLA will provide, upon request, a spill residue disposal service for the remainder of FY 81 and FY 82 with the DoD components to provide necessary funding. (The DEQPPM 80-5 Interservice Task Group will define the operational procedures and parameters.)

DLA will determine hazardous materials conforming storage requirments to support its assigned disposal mission.

To assist in the preceding DLA effort, the DoD components will, in coordination with DLA, assess the adequacy of present storage capability at each installation. The DoD components are to provide estimates to DLA of the projected generation of hazardous materials.

The total requirement for hazardous material conforming storage facilities will be identified for each installation through a coordinated DLA/DoD component team effort under DLA lead. Where a storage facility is needed at the supporting Defense Property Disposal Office, DLA will program the MILCON or O&M funds required. When a joint use facility will best meet the total DoD requirement for a given installation or geographic region, DLA will work with the DoD component to determine program responsibility for the required MILCON/O&M funds in accordance with the provisions of DoD Directive 7150.5, dated August 26, 1978.

DLA should continue to address installation support problems on a case-by-case basis. The interservice task group that DLA chairs should continue to be used to address issues that may arise in the implementation of DEQPPM 80-5. The Hazardous Materials Disposal Policy Steering Committee will provide assistance on an as-required basis. DLA should report unresolved issues to the Deputy Assistant Secretary of Defense (Energy, Environment and Safety).

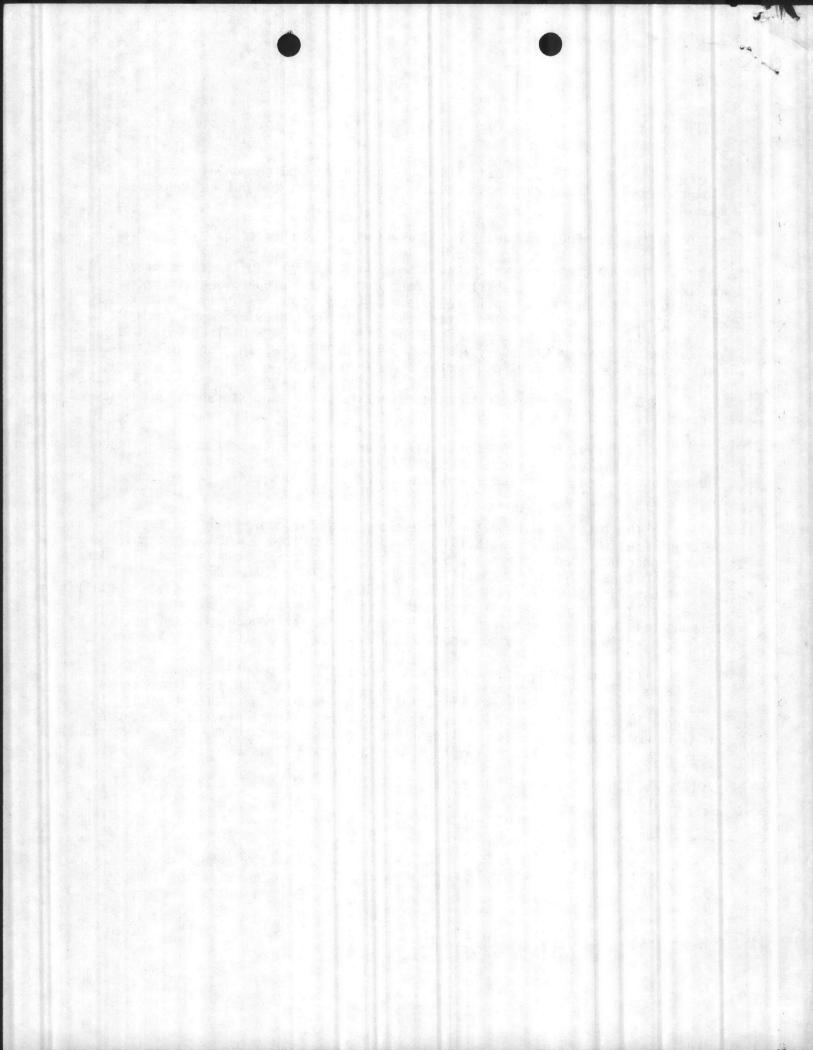
IMPLEMENTATION: The provisions of this DEQPPM are effective on this date.

DPDO -- LEJEUNE

2881 61 JUA

BECEINED

George Marienthal
Deputy Assistant Secretary of Defense
(Energy, Environment and Safety)



MAIN/JIW/th 6240 19 Aug 1982

From: Base Maintenance Officer

To: Distribution List

Subj: Hazardous and Toxic Material Information

Encl: (1) HQMC 1tr Haz Mat Information Transfer of 11 Aug 1982

1. The enclosure is submitted for your information.

J. I. WOOTEN
By direction

DISTRIBUTION: AC/S FAC AC/S LOG

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Sinal ream

Memorandum

FROM: Paul Hubbell

10: Mr. Julian Wooten, Director Natural Resources

SUBJ: Information Transfer

Encl: (1) DLA Commander's Guidance Statement #8 of 7Jun 82 (2) Scruba Dubster product literature

Folk World DATE: 11 Aug 82

1. Enclosure (1) indicates a definite commetment by DPDS

to have its Regions and Defense Property Disposal Offices

" step General and fully accept [their] responsibility

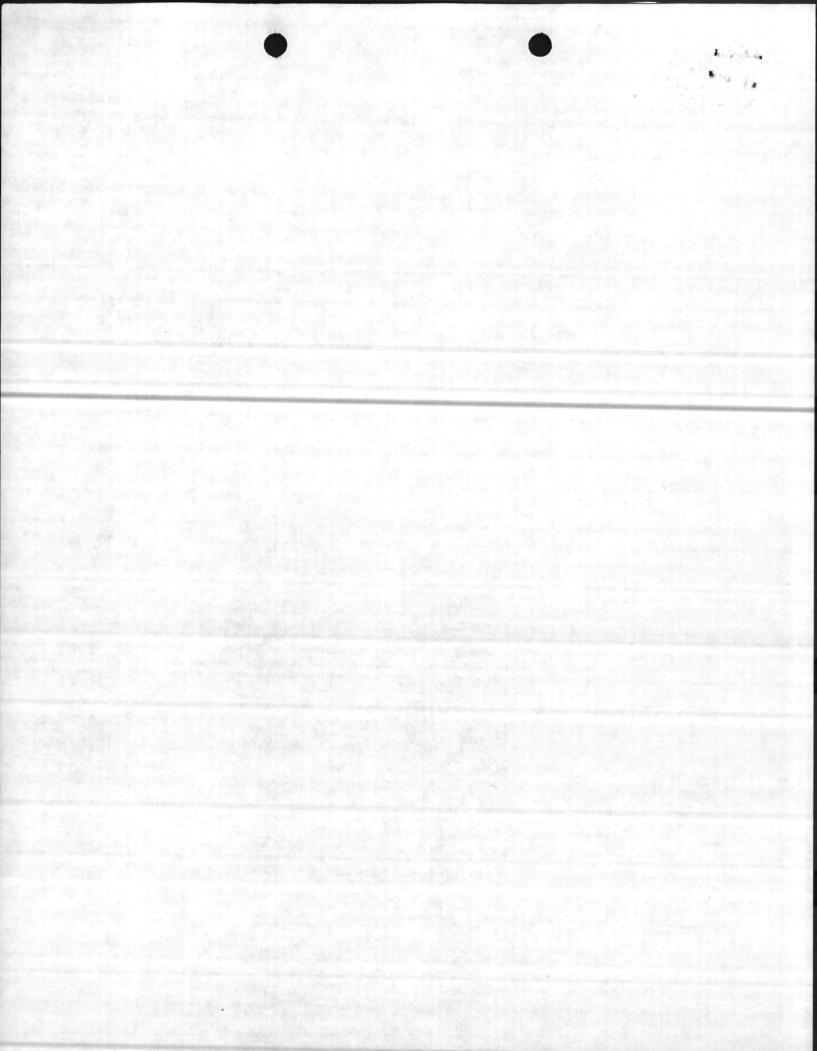
in the disposal of Layardons and toxic materials!!

This document may be beneficial to you in dealing with

reluctant DPDO's.

2. As a point of intent, and possible future concern, I recently found out that the DoD philosophy of delaying the designation of an item as a higherdown wrote vice a harpardown material (until all avenues for sale on reuse are explored - thus delaying the 90 day storage clock) is now being challenged by certain state (notably TX and CA).

3. You may wish to pass enclosure (2) to the maintenance offices for his information/use.





REFER TO

DPDS-D

DEFENSE LOGISTICS AGEN

DEFENSE PROPERTY DISPOSAL SERVE

FEDERAL CENTER

BATTLE CREEK, MICHIGAN 49016

7 June 1982

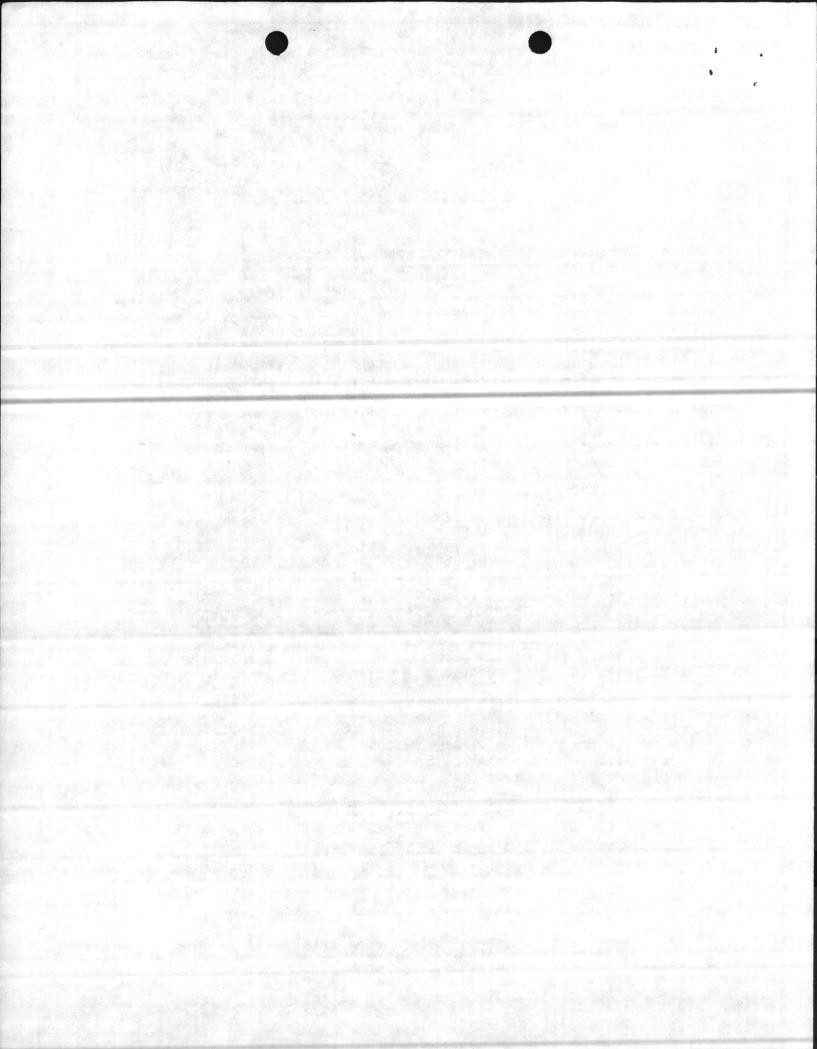
COMMANDER'S GUIDANCE STATEMENT (CGS) NO. 8

SUBJECT: Custody of Hazardous and Toxic Material

ACTION AGENCY

SUSPENSE

- 1. For some time now this Command has been charged with the mission of disposing of hazardous and toxic materials and waste. We have worked diligently to determine our responsibility and to help develop the DoD policy. As I am sure you are aware, the DoD policy concerning who will maintain custody of hazardous and toxic material and waste is clear. In a nutshell that policy is that if the DPDO has conforming storage the DPDO will accept accountability and custody. If the DPDO does not have conforming storage and the generator does; the DPDO accepts accountability and the generator maintains custody. If neither the generator nor the DPDO have conforming storage then whoever has the most nearly conforming storage maintains custody. If agreement cannot be reached as to who has the most nearly conforming storage then the decision will be raised through command channels to DoD for a decision.
- 2. Having said all of that my concern now is that we may not have made an honest effort to accept custody of hazardous and toxic material when we do in fact have the necessary conforming storage or when our storage is as nearly conforming as the generator. This is becoming a problem between DPDS and the services; as a result, we have agreed that we will develop a check sheet for use at the installation level to determine who has the most nearly conforming storage. It is invisioned that this check sheet will be executed by the installation commander. I support this process because the installation commander is the one responsible for storage of hazardous and toxic materials by all tenants to include the DPDO.
- 5. Prior to the formal execution of this check sheet which is a few months away, I want each DPDO to reevaluate with his host those items which can be stored safely and without danger of spill in the DPDO area. In those cases where an item is designated by Table 5-5 of DoD Regulation 4145.19-R-1 to be stored in a general purpose warehouse I expect that we will take physical custody unless we do not have a general purpose warehouse.



DPDS-D

PAGE 2

SUBJECT: Custody of Hazardous and Toxic Material

7 June 1982

DPDS-H

DPDO

DPDR

DPDR

4. Bottom line is that the time has come for us to step forward and fully accept our responsibility in the disposal of hazardous and toxic materials. Acceptance of physical custody when feasible and possible is critical to identification of the waste stream and help us to learn to properly store this material. One final thought, I am concerned that in some cases when we have accountability but not custody that we lapse into the feeling "out of sight, out of mind" and since the property is not within the DPDO we do not move as quickly as we should to dispose of the property. We need to be sure that is not the case.

ACTIC: AGENCY SUSPENSE

1 Oct 82

30 Jun 82

Continuous

As Required

5. Directed actions:

- a. Development of check sheet.
- b. DPDOs should make contact with their host to insure that the attitude of cooperation, not confrontation exists at the PDO level. Problems beyond resolution at the DPDO, DPDR level should be surfaced to DPDS-H.
- c. DPDRs should assist DPDOs in making determinations concerning ability to store hazardous and toxic materials.

HENRI G. SKEEN Brigadier General, USA Commander

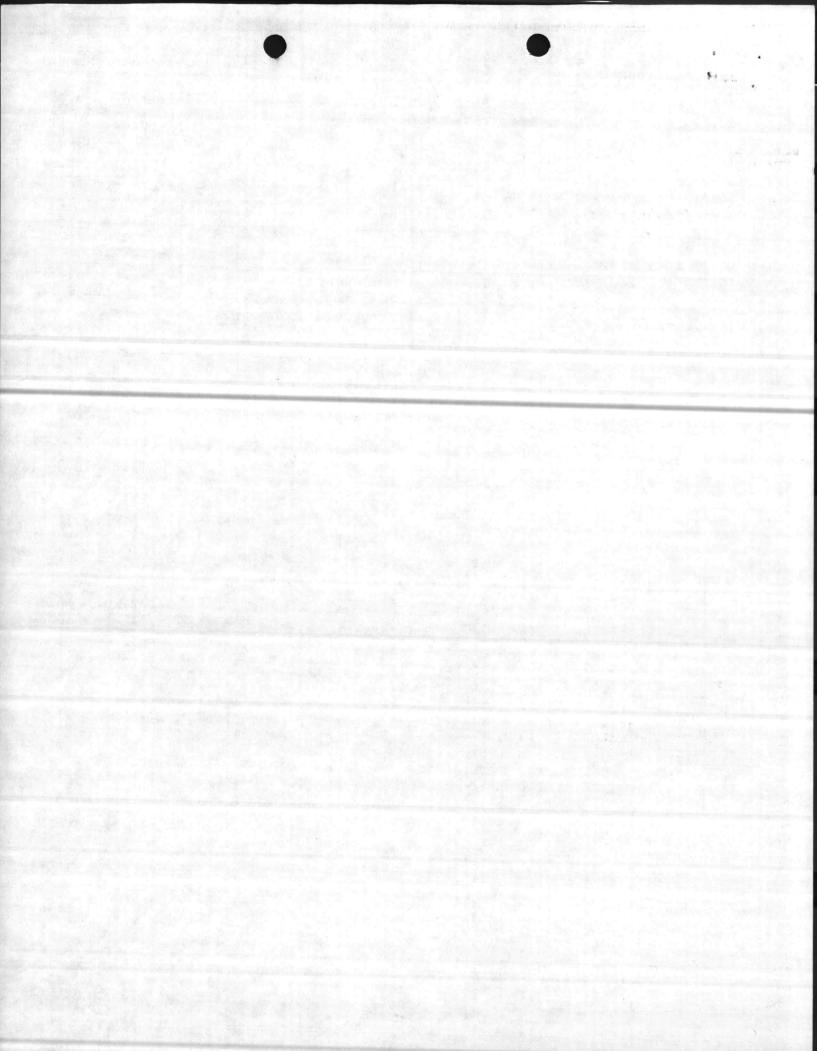
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B1-B3

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Addendum:

In paragraphs 2 and 4 above whenever I mention hazardous and toxic material it should be understood that waste is also included, i.e., hazardous and toxic material and waste.



J., BANKS HUDSON, INC.

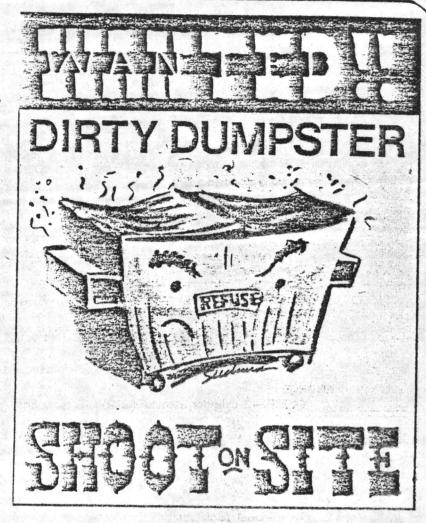
ScrubaDubster

BANKS HUDSON (202) 244-7103 4714 SEDGWICK STREET, N. W. WASHINGTON, D. C. 20016

Specifically engineered by the "old pros"...

Shoots on site for clean dumpster containers

Obviate Container Nuisance
Prolong Container Life
Enhance Container Cleanliness









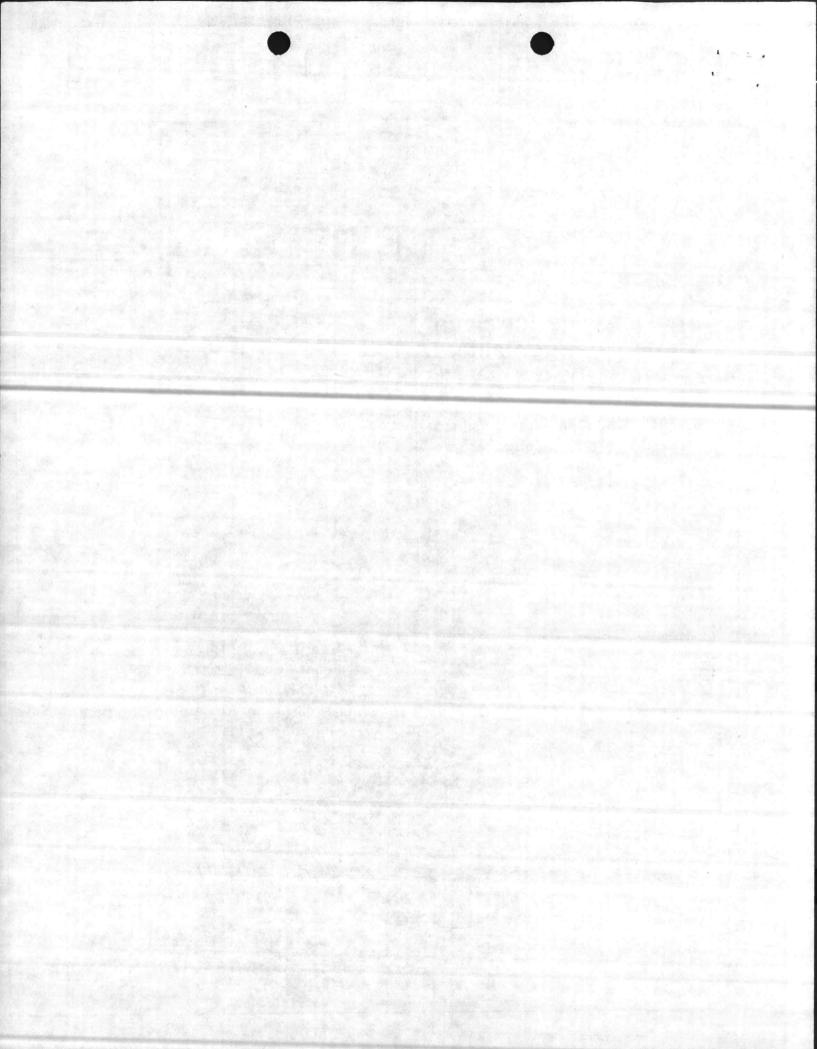


Rear Load (RLP) Containers
Front Load (FEL) Containers
Hoist Haul (Arm-Chain) Containers
Truck Mounted Hauling Equipment
Container Sites

USN "FPB" Fast Pay Back

USA "QRIP" Quick Return on Investment Program

USAF "FASCAP" Fast Capital Amortization Program



ScrubaDubster - Model 1500

SPECIFICATIONS

HOT HIGH PRESSURE WASHER:

Discharge-5 GPM 300 GPH

Pressure -1500 PSI, adjustable

Hose-80' High Pressure Hose standard

Pump-Triplex design with lubricated crosshead-withstands extended periods of

no-water useage.

Trigger Gun-"Deadman" type, cool grip-

Discharge Temperature -- Adjustable to 210°F

Burner - 460,000 BTU Input

Ignition - Aircraft magneto, constant

Fuel Type-Kerosene, No. 1 or No. 2 Diesel

Fuel Tank—8 hour capacity

Fuel Consumption - Burner - 3.0 GPH

Chemical Feed - High pressure and low pressure standard, both systems calibrated.

ENGINE:

24 H.P.-2 cylinder standard, air-cooled gasoline, electric start. (See Options)

VACUUM SYSTEM:

Air Flow-150 CFM

Maximum Vacuum - 27" Mercury

Hose Length -- 50' x 3" I.D. Standard

Wand -5' with Three Heads

WATER TANKS:

Type - Dual Tank Design

Capacity - 500 gallons each

Interior - Baffled

SPECIAL FEATURES:

- Electric clutches permit independent or simultaneous operation of vacuum system and pressure washer.
- All tanks have liquid indicators.
- Pressure hose mounted or hose real.
- Skid mounted.

OPTIONS:

Engines - 30 HP 4 Cylinder Gasoline, air-cooled

Diesel engines per customers specifications

Electric motor drives, including availability of all standard voltages, 50 or 60 Hz and explosion proof.

Mounting - Hoist eye for skid mounted units.

Dual axle trailer.

Truck mounted per customer specification.

Tanks - Fiberglass or stainless steel per customers corrosion requirements.

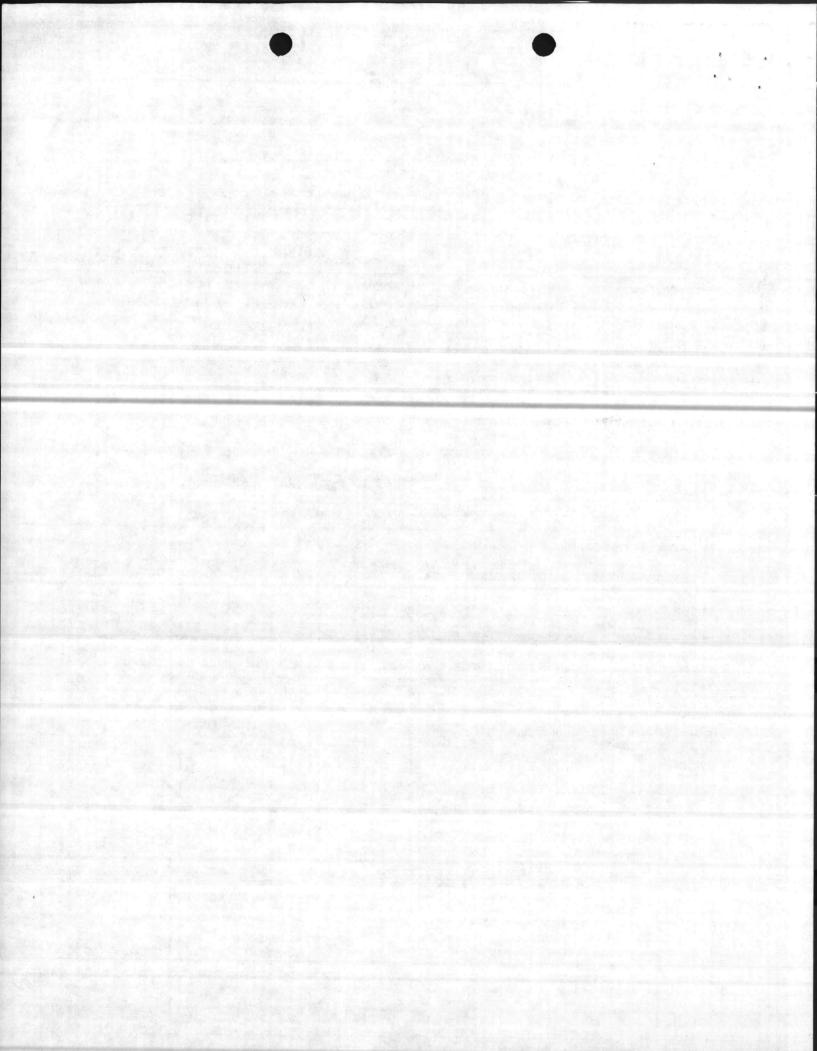
Capacities to customer's specifications, including 8 hour continuous operation capability.

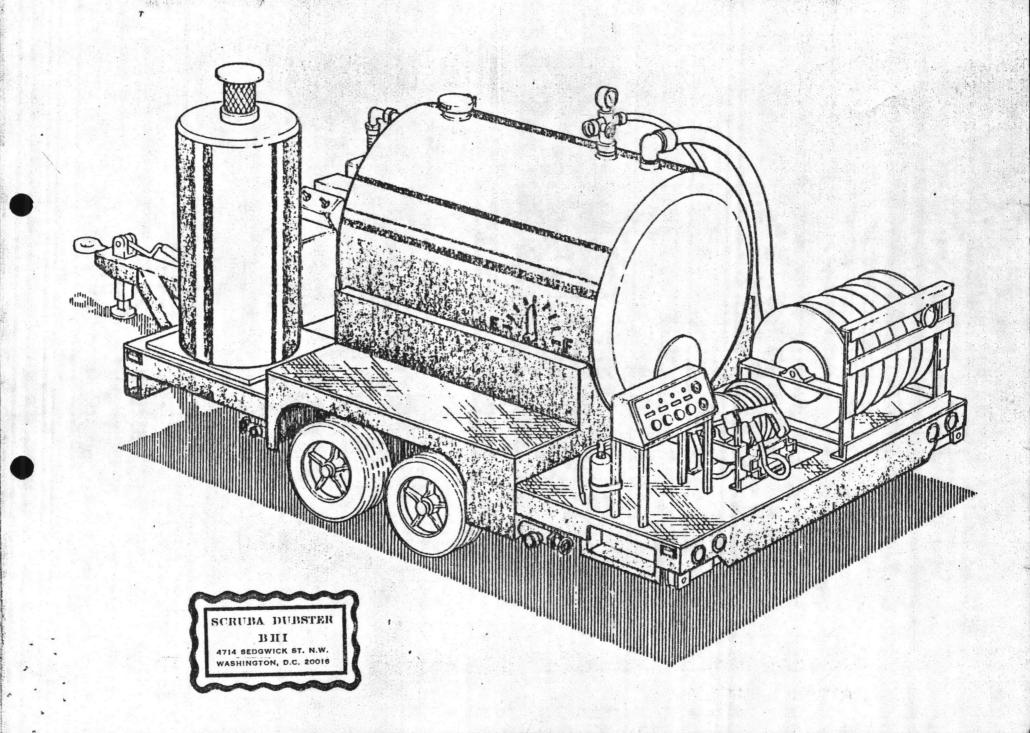
Hose Reel-Suction hose reel-hand crank or electric.

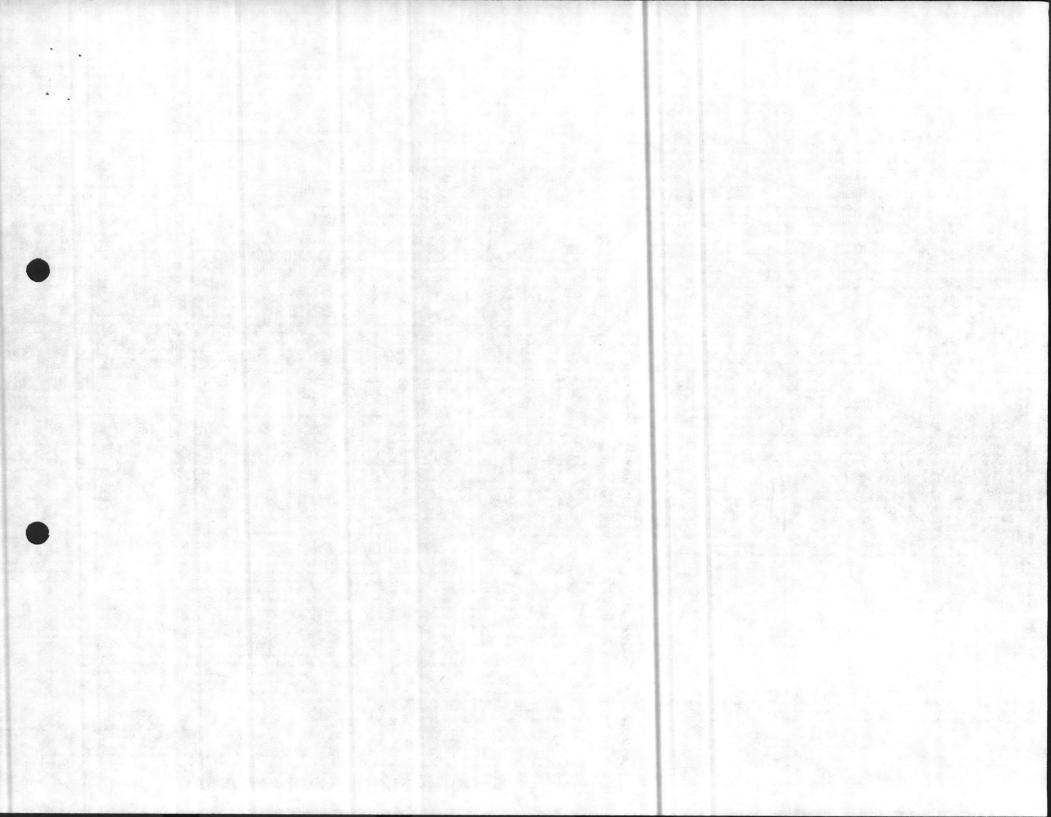
Sand Blast - Liquid sand blasting attachment with sand hopper - 100#, 300#, and 800# capacities standard.

Pressure - To 5,000 PSI available per customer specification.

Volume - To 12 GPM per customer specifications.







(PROCUREMENT DESCRIPTION FOR ON-SITE CONTAINER CLEANING EQUIPMENT)

The intended primary use of the equipment is to perform the specialized task of cleansing, at their assigned sites, more efficiently, conviently and economically Solid Waste Collection Equipment: dumpster and roll-off containers inside and out, stationary packers and indicated prepared sites. The transporting vehicles and other similar compatible cleansing tasks are also to be accomplished.

It is required that technologies associated with high pressure hot water, vacuum, chemicals and abrasives will be knowledgeably combined and exploited to provide a device able to apply processed cleansing to the Collection Equipment so its operation may continue to the satisfaction of the "customers" dependent on that Collection System.

HOT HIGH PRESSURE WASHER

Discharge: 5 gpm-300 gph

Pressure: 1500 psi adjustable

Hose: 30' high pressure hose on spring rewind reel

Pump: Triplex design with lubricated cross head

to withstand extended periods of no water usage

Trigger gun: Thermo-plastic dead man type. Wands with grips 24" and 48": extension 36". Three nozzles of O degree, 15 degree and 25 degree spray patters, all quick

couple. Discharge temperature: adjustable to 200 degrees.

Burner: 46,000 BTU input

Ignition: Aircraft Magneto, constant

Fuel: Kerosene #1 or #2 diesel

Fuel Tank: 3 hour capacity

Fuel Consumption: Burner 3.0 gph

Chemical Feed: High pressure and low pressure, both systems calibrated.

ENGINE

Diesel: Deutz: power minimum equivalent 24 hp gasoline

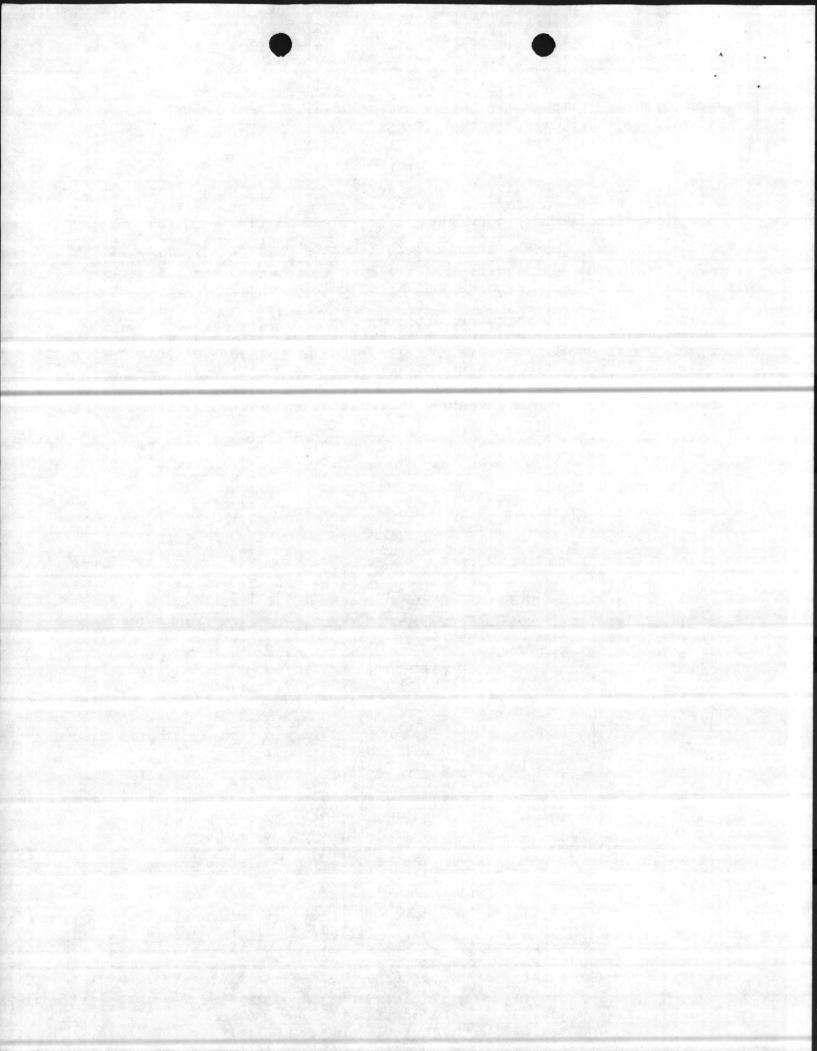
VACUUM SYSTEM

Air Flow: 270 cfm @ 15" Hq

Blower: direct drive-twin impeller

Hose: 30' 3" ID on spring rewind roll

Wand: 5' with three heads



(2) (Procurement Description continued)

WATER TANKS

1000 gallon total capacity divided by baffle for 500 gallons fresh and 500 gallons waste; equipped with cleanout gate and rapid discharge valve. The former to provide easy manual cleanout and the latter to provide a discharge diameter at least 25% greater than the waste inlet diameter.

TRAILER

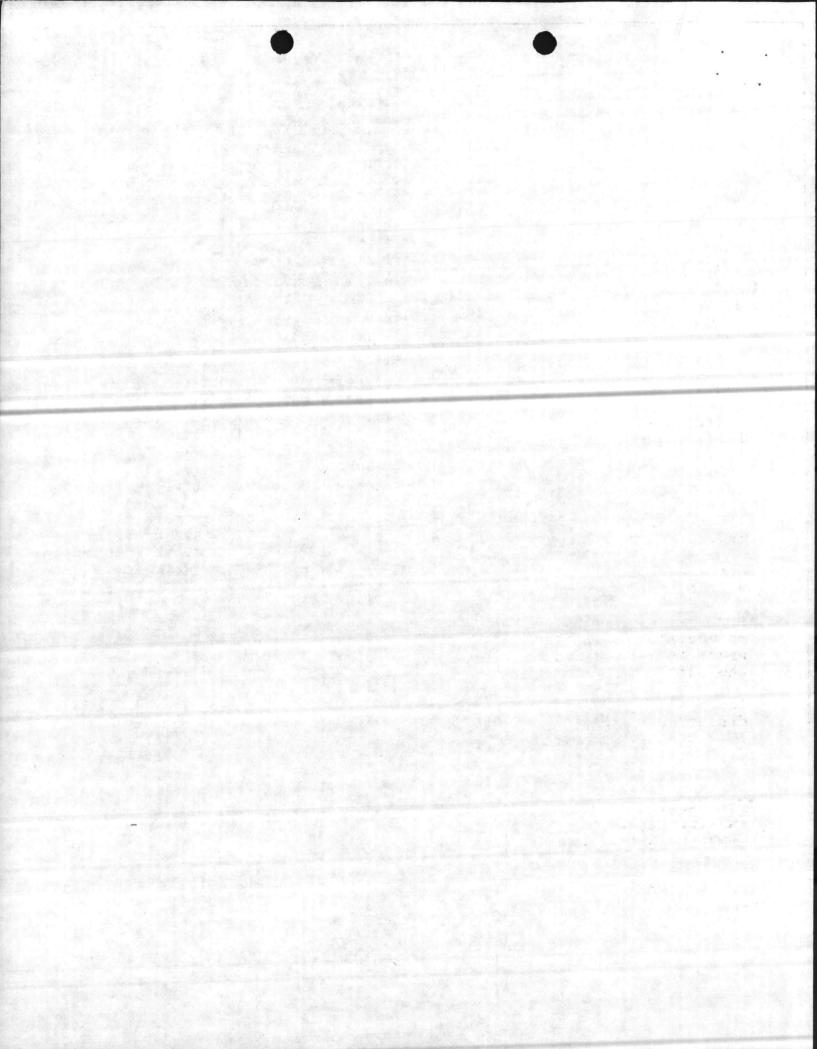
To be mounted on dual axel trailer to withstand rugged service to operate with GAWR of 11000 lbs. minimum: ICC lighting-compatible hitch.

REQUIRED FEATURES

Electric clutches: to permit independent or simultaneous operation of vacuum and water systems. All tanks to have liquid indicators.

Sand blast: liquid sand blasting with 300 lb. capacity sand hopper.

Water concentration device: to enable operator
to assemble occassional
pools of water in dumpster
so vacuum will leave interior
moist-dry.



CONTAINER CLEANSING*

In order to incorporate acceptably into the necessary process of waste handling, the specialized task of cleansing refuse containers, stationary packers and hardened sites, must offer the capabilities listed hereinafter.

A System using high-pressure hot water, detergent-deodorant, grit and vacuum must be brought to the containers for use on-site at the regularly assigned locations of the containers.

Each unit of the System shall be able to process-cleanse containers per the subsequent schedule, in the required increments, at a minimum rate of 15 Eight Cubic Yard Containers in eight contiguous hours.

Water temperature must be adjustable to a maximum of 200 degrees Farenheit, pressure adjustable to a maximum of 1500 psi, flow rate at 5 gpm minimum.

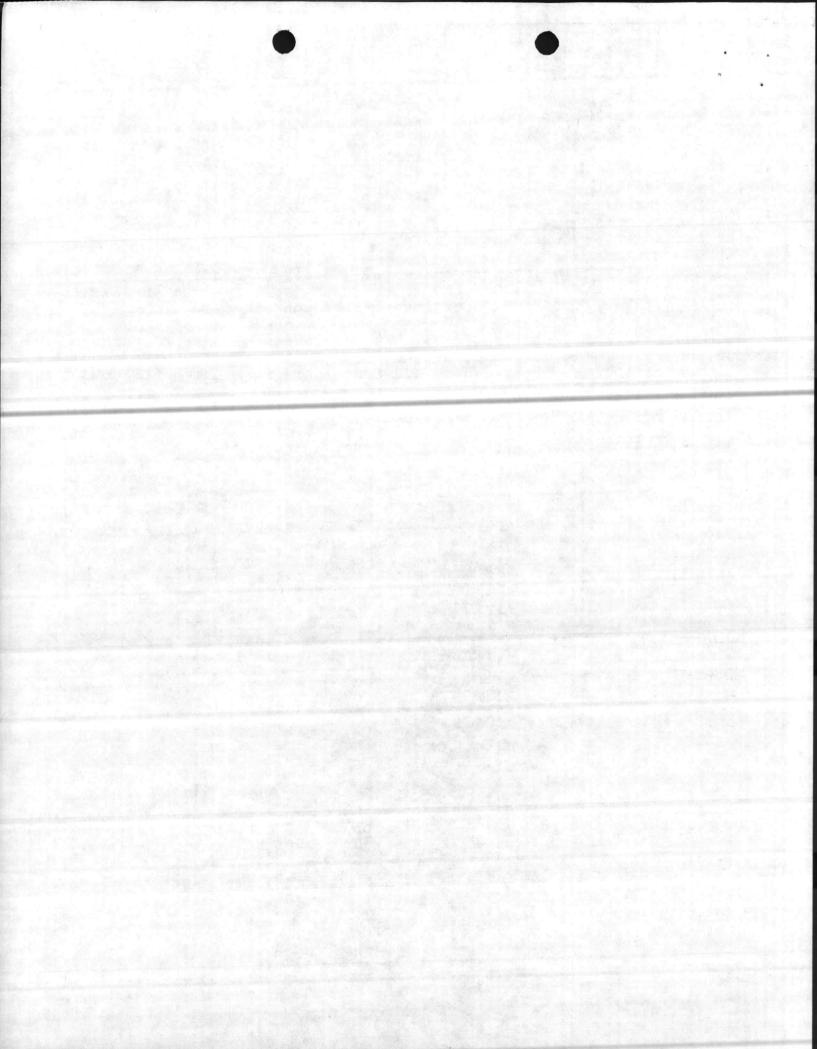
Vacuum at 270 cfm at 15" Hg with capability to vacuum cleanse and leave moist-dry not only the containers, inside and out, but also the hardened sites where certain containers and stationary packers regularly repose.

Detergent-deodorant capability, as well as grit capability, must be a compatible, intergal component of the cleansing system.

For reasons of safety to inhibit explosion and electrical hazards to operators and others who may be in the many sensitive areas where the operation takes place, aircraft magneto is required in the burner chamber.

The System shall neither disrupt the waste handling process nor disturb community life-style.

^{*}For use to obtain adequate contract service by incorporation in the Invitations to Bid for Refuse Service or as an in-house directive to Government employees when work is performed by the Base's own forces.



KIT, CONTAINER MAINTENANCE

Especially developed to ease maintenance requirements, prolong the life, and protect the investment in both new and already in-use Refuse Containers, the following describes a development by Polymetrics, Inc. of Maitland, Florida, a company long established in problems associated with rail car body maintenance.

Designed particularly for the unique damage control need in Refuse Containers, the Kit provides a System of Polyurothane for the entire Container, inside and out, including especial provision for the vulnerable bottom section, the top lid and end door assemblies. The color incorporated in the System is the customer's choice.

For material costs of about 1/6 that of a new container the use of the Kit anticipates extending the on-line life of a new or in-use FEL, RLP or RO Refuse Container some 3x. Thus, "2 free containers" for each to which application of the Kit is made.

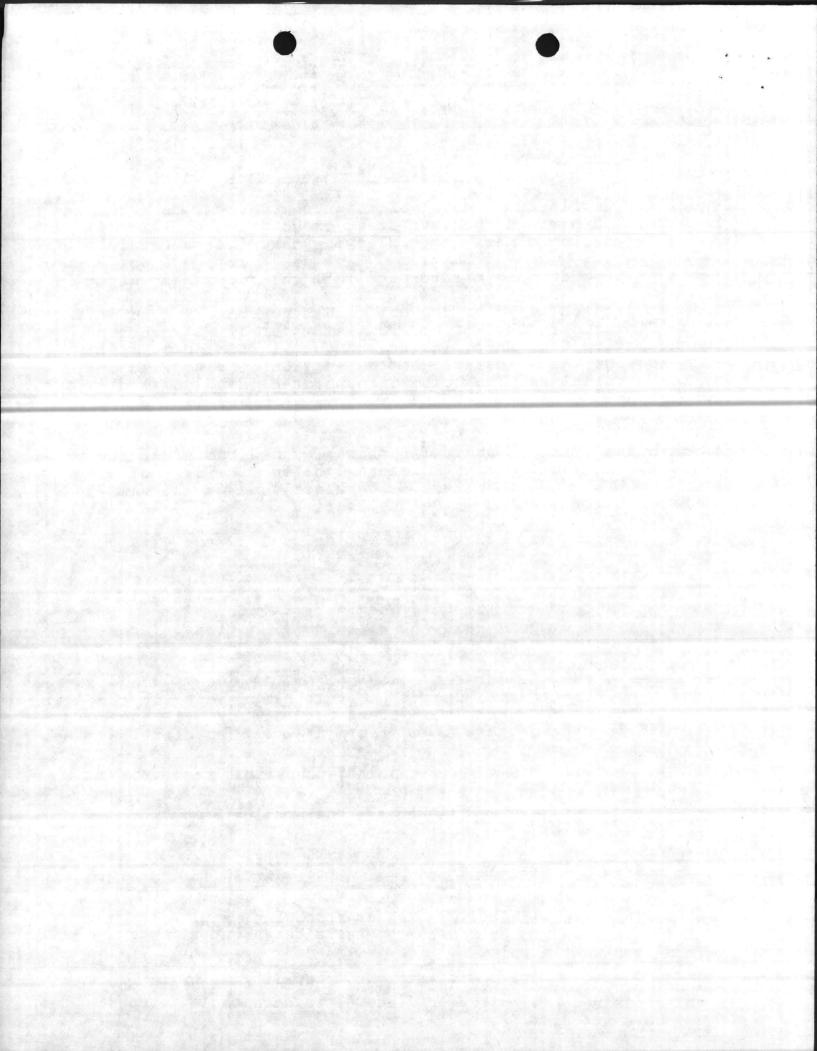
Further, dumping and sanitation are improved by the very smooth, "stick-free"surfaces. Offensive odor is reduced.

Although quite new (May of 1981), the Kit has satisfingly quick commercial acceptance including containers owned by the largest Refuse Service Company, a U. S. Based multi-national, whose containers number high in the thousands.

Technically, the Kit for the Container Maintenance System centers around a Polyisocyanate Monomer known to offer superior corrosion resistance. As polyurethane systems are already well known to the Armed Services, there is no learning curve to climb.

The Kit consists of four interrelated, compatible dependents:

- I-A specific solvent, applied to the "paintable" surface inside and outside.
- 2-A designed primer, silver in color, also applied inside and outside.
- 3-A flexible, resilient liner, shock absorbing, applied inside only on the bottom and up the sides about a foot. This is black in color.
- 4-A color system, applied only on the outside to achieve any color desired. If silver (#2 above) is acceptable, step 4 may be omitted.



As to application, our directions are complete, detailed and simple. Any painter can handle the task. Steps 1, 2 and 4 may be brushed, rolled or sprayed. Step 3 should be rolled.

....

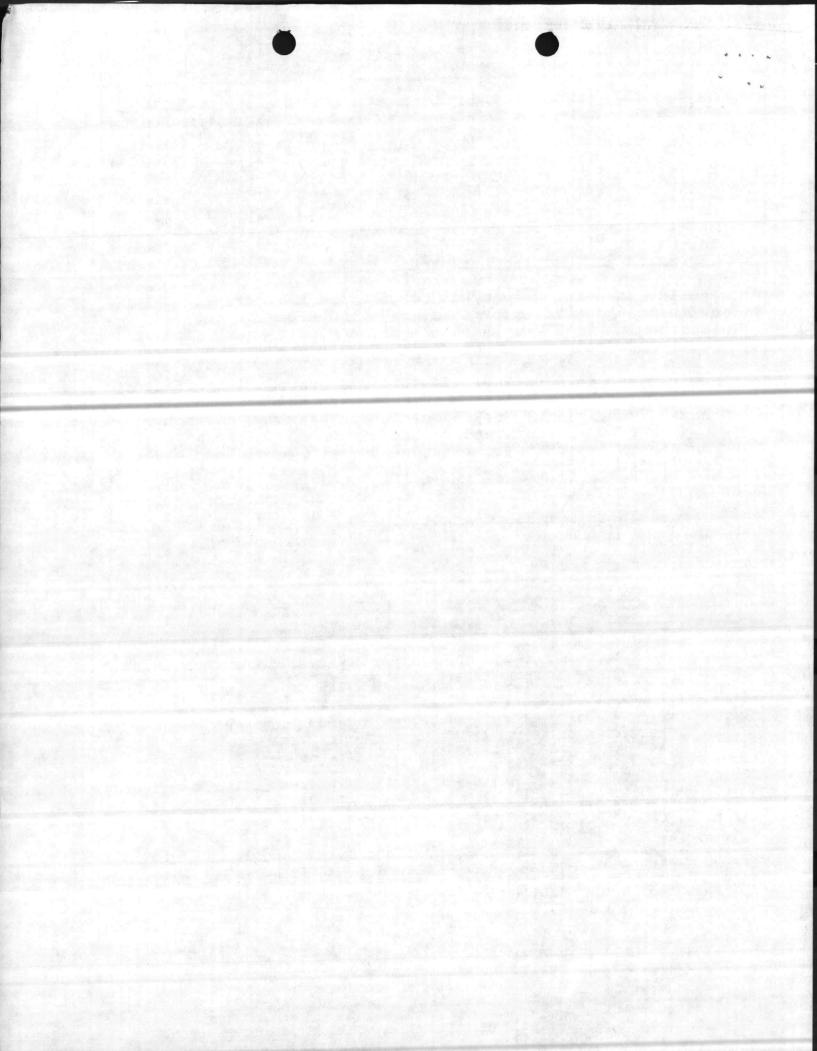
Polymetrics, Inc. the manufacturer who developed the System of Maintenance Kits for refuse containers, is long established in the polyurethane coating of the interior of rail cars where corrosion and dumping are problems.

The Kit is being used by major firms in the Refuse Service business whose inventories of many thousands of containers are located in the U.S., Europe and the Middle East, also in South America. The endorsement of such users is unimpeachable.

An increase in container life 3 times provedes significant capital retention: less than a hundred dollars in material "buys" 2 additional "new" containers. With new containers costing \$700.00 delivered and in place, the savings on 100 containers approximates \$140,000.00-a figure of noteable magnitude. Improved on-line time and facilitated dumping from the smooth, slick liner are concomittants.

We anticipate further contact.

J. BANKS HUDSON, INC.



(For inclusion in Service Contractors agreements when they provide new, used or rehab'd Refuse Containers for the Base)

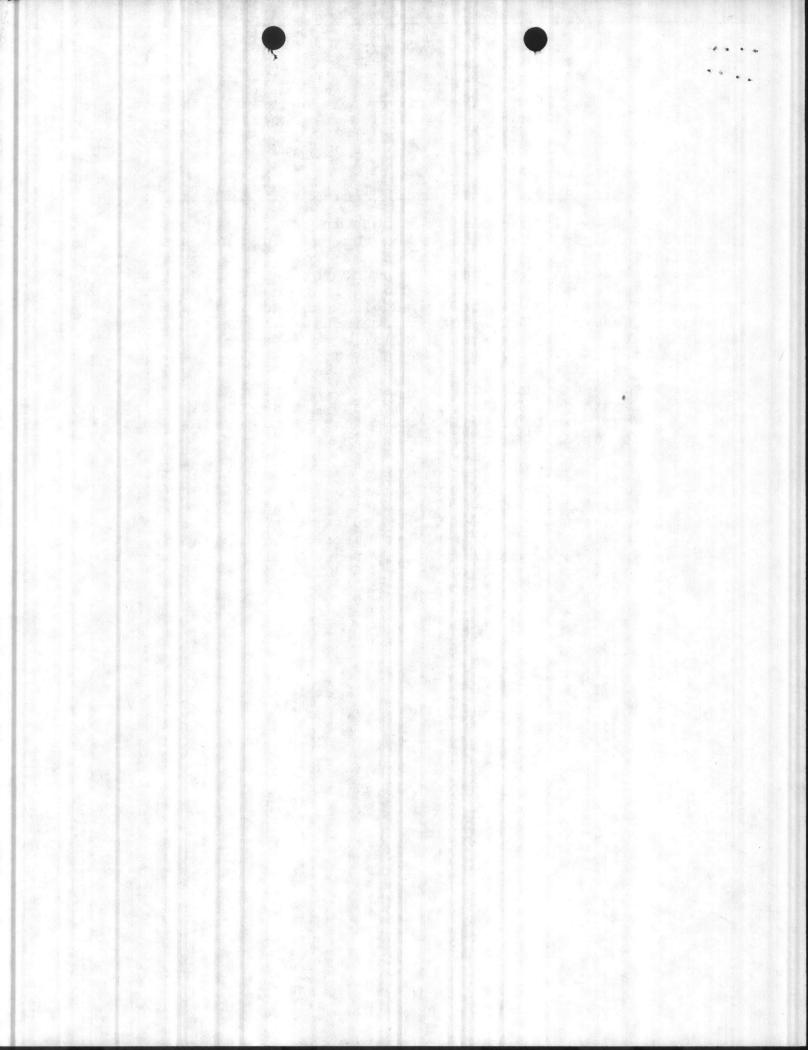
CONTAINER TREATMENT, PAINTING AND PRESERVATION

To protect the Government's investment in its containers, to improve container appearance, to enhance dumping and thus cleanliness and to reduce odor problems, containers going thru rehabilitation and those new or replacement containers brought aboard the Base shall be, in lieu of conventional painting, cleaned, treated and painted in accord with a commercial Polyurethane System Kit designed for refuse containers (Polymetrics part # BH101 or equal) following the supplier's directions.

Surfaces to be painted shall be cleaned and dried to insure they are free from contaminants, such as oil, grease, welding slag and spatter, loose mill scale, water, dirt, loose paint, corrosion product, or any other contaminanting substances.

As soon as practicable after cleaning, and before any corrosion or other contamination can result, the surfaces shall be prepared or treated to insure adhesion, according to manufacturer's directions. Coating shall be with manufacturer's current materials according to supplier's current processes. The finished paint coat shall be free from runs, sags, orange peel or other defects

The color of the finish coat shall be as specified by the Base.



BASE MAINTENANCE DIVISION

Marine Corps Base Camp Lejeune, North Carolina 28542

> MAIN/JIW/th 6240 19 Aug 1982

From: Base Maintenance Officer

To: Distribution List

Subj: Hazardous and Toxic Material Information

Encl: (1) HQMC 1tr Haz Mat Information Transfer of 11 Aug 1982

1. The enclosure is submitted for your information.

J. I. WOOTEN By direction

DISTRIBUTION:

AC/S FAC AC/S LOG STEP STEEL BELLEVIEW STEP.

NOT STREET

Memorandum

DATE: 11 Aug 82

FROM: Paul Hubbell

TO: Mr. Julian Wooten, Director Natural Resources

SUBJ: Information Transfer

Encl: (1) DLA Commander's Guidance Statement #8 of 7Jun 82

(2) Scruba Dubster product literature

1. Enclosure (1) indicates a definite commetment by DPDS

to have its Regions and Defense Property Disposal Offices

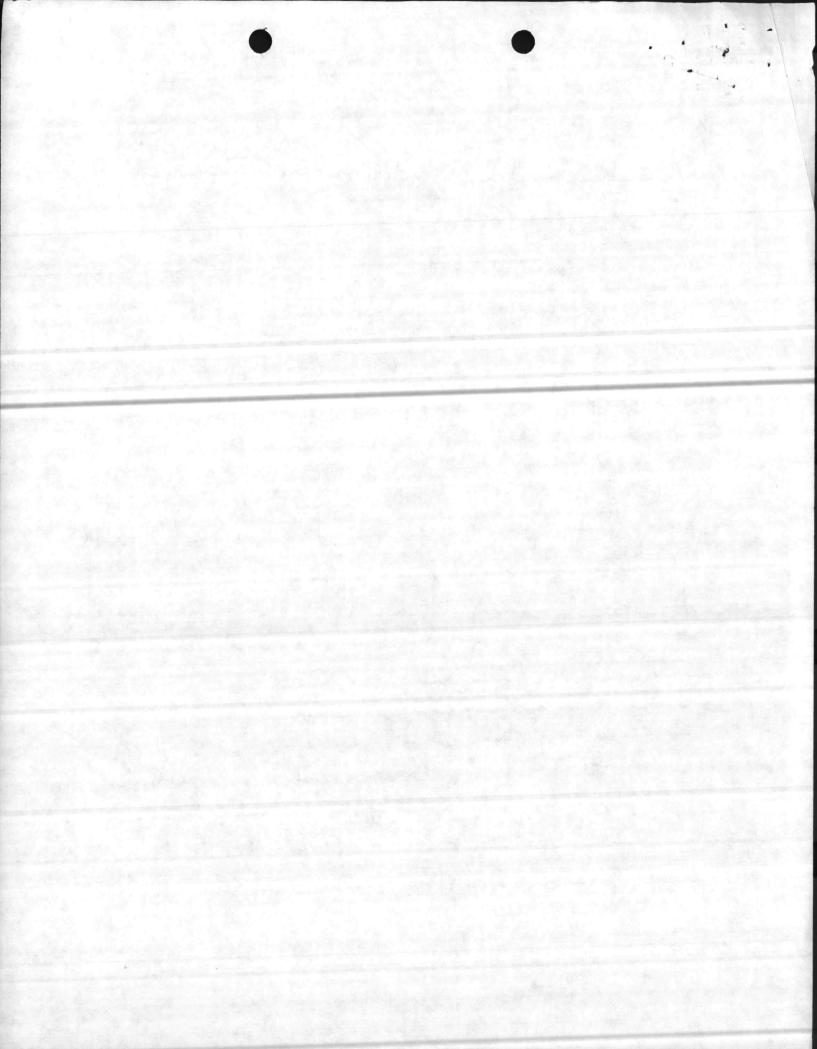
... " step forward and fully accept [their] responsibility

in the disposal of hazardons and toxic materials".

This document way be bareficial to you in dealing with

reluctant DPDO'S.

- 2. As a point of interest, and possible feature concern, I recently found out that the DoD philosophy of delaying the designation of an item as a higherdown wrote vice a hargandown material (until all avenues for sale on reuse are explored thus delaying the 90 day storage clock) is now being challenged by certain state (notably TX and CA).
- 3. You may wish to pass enclosure (2) to the maintenance officer for his information/use.





7 June 1982

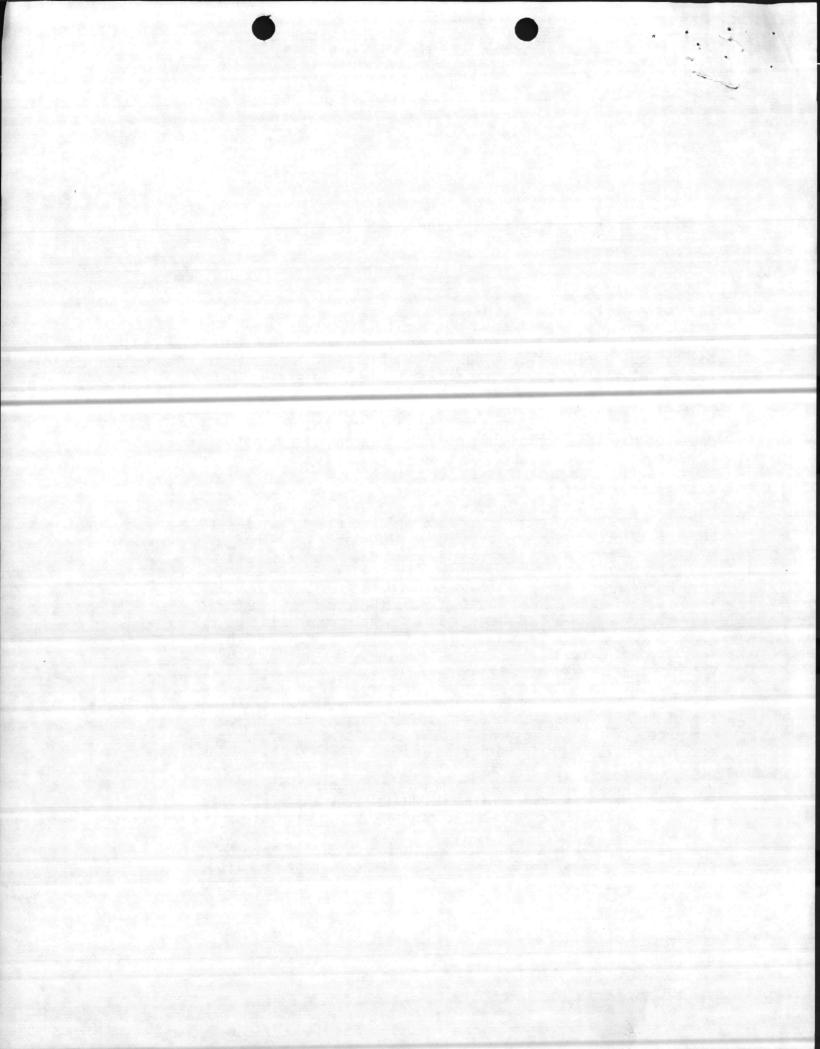
COMMANDER'S GUIDANCE STATEMENT (CGS) NO. 8

SUBJECT: Custody of Hazardous and Toxic Material

ACTION AGENCY

SUSPENSE

- 1. For some time now this Command has been charged with the mission of disposing of hazardous and toxic materials and waste. We have worked diligently to determine our responsibility and to help develop the DoD policy. As I am sure you are aware, the DoD policy concerning who will maintain custody of hazardous and toxic material and waste is clear. In a nutshell that policy is that if the DPDO has conforming storage the DPDO will accept accountability and custody. If the DPDO does not have conforming storage and the generator does; the DPDO accepts accountability and the generator maintains custody. If neither the generator nor the DPDO have conforming storage then whoever has the most nearly conforming storage maintains custody. If agreement cannot be reached as to who has the most nearly conforming storage then the decision will be raised through command channels to DoD for a decision.
- 2. Having said all of that my concern now is that we may not have made an honest effort to accept custody of hazardous and toxic material when we do in fact have the necessary conforming storage or when our storage is as nearly conforming as the generator. This is becoming a problem between DPDS and the services; as a result, we have agreed that we will develop a check sheet for use at the installation level to determine who has the most nearly conforming storage. It is invisioned that this check sheet will be executed by the installation commander. I support this process because the installation commander is the one responsible for storage of hazardous and toxic materials by all tenants to include the DPDO.
- 3. Prior to the formal execution of this check sheet which is a few months away, I want each DPDO to reevaluate with his host those items which can be stored safely and without danger of spill in the DPDO area. In those cases where an item is designated by Table 5-5 of DoD Regulation 4145.19-R-1 to be stored in a general purpose warehouse I expect that we will take physical custody unless we do not have a general purpose warehouse.



DPDS-D PAGE 2 7 June 1982

ACTIO.

AGENCY

DPDS-H

DPDO

DPDR

DPDR

1 Oct 82

30 Jun 82

Continuous

As Required

*SUBJECT: Custody of Hazardous and Toxic Material

4. Bottom line is that the time has come for us to step forward and fully accept our responsibility in the disposal of hazardous and toxic materials. Acceptance of physical custody when feasible and possible is critical to identification of the waste stream and help us to learn to properly store this material. One final thought, I am concerned that in some cases when we have accountability but not custody that we lapse into the feeling "out of sight, out of mind" and since the property is not within the DPDO we do not move as quickly as we should to dispose of the property. We need to be sure that is not the case.

5. Directed actions:

a. Development of check sheet.

b. DPDOs should make contact with their host to insure that the attitude of cooperation, not confrontation exists at the PDO level. Problems beyond resolution at the DPDO, DPDR level should be surfaced to DPDS-H.

c. DPDRs should assist DPDOs in making determinations concerning ability to store hazardous and toxic materials.

> HENRT G. SKEEN Brigadier General, USA Commander

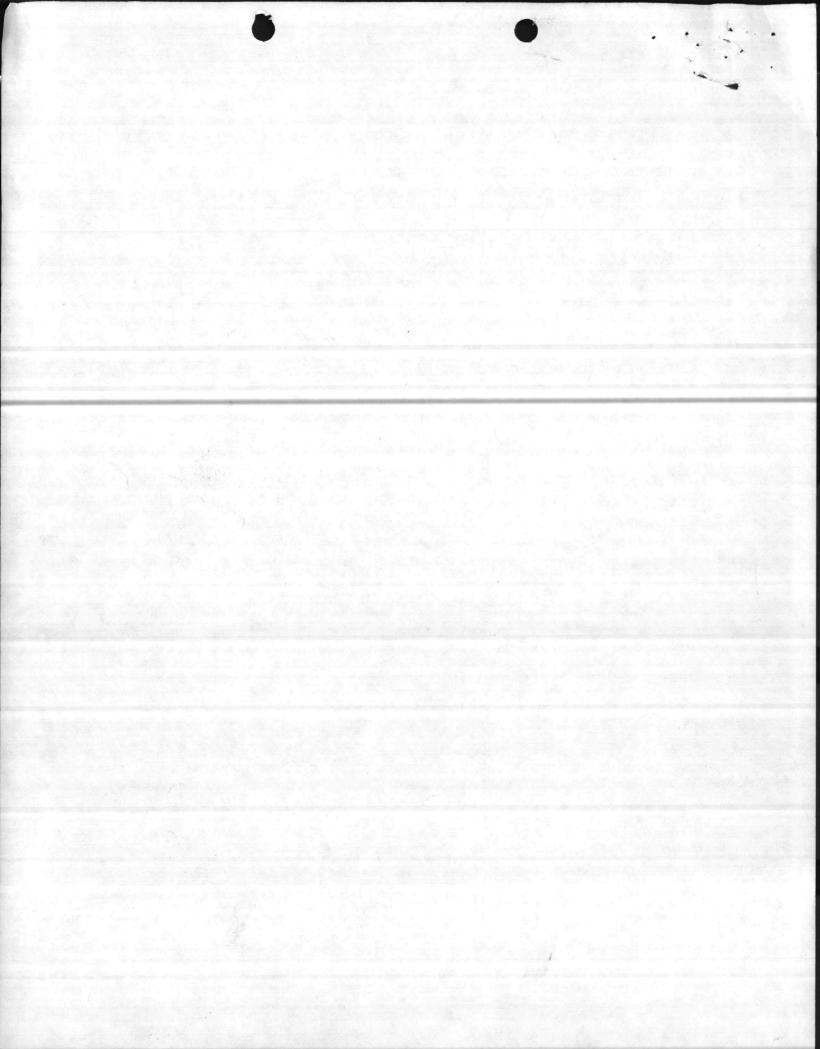
DISTRIBUTION:

B1-B3

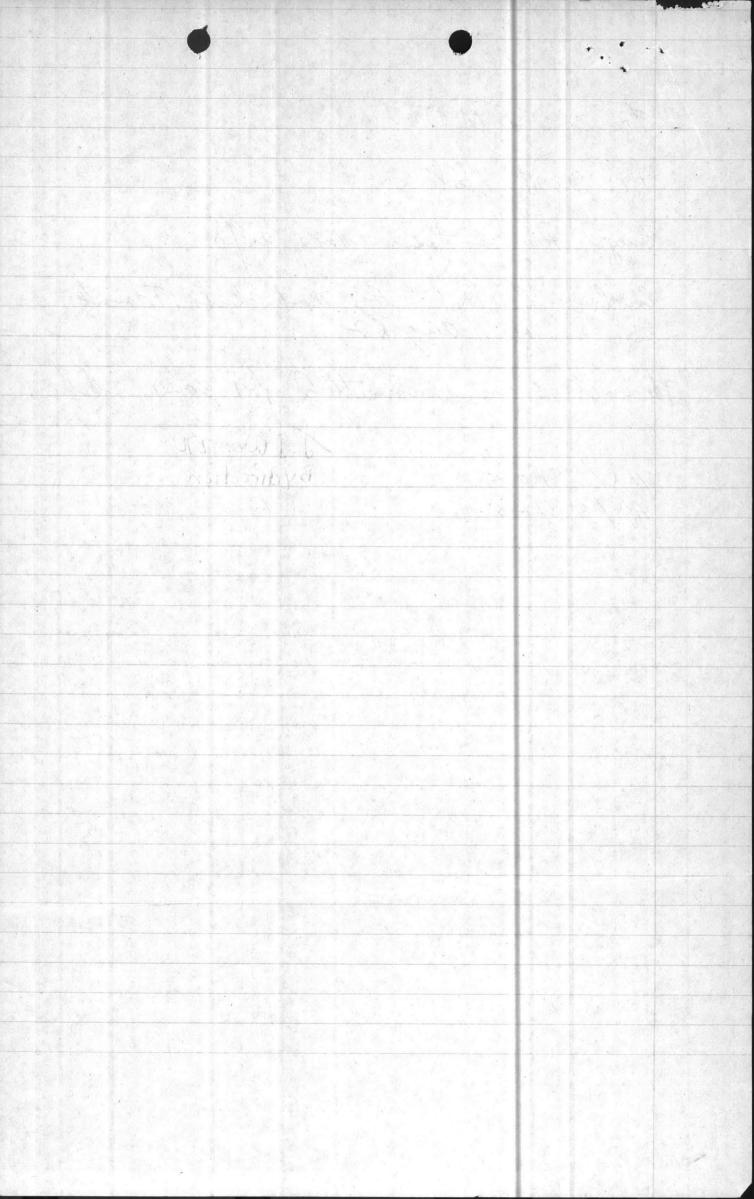
DD minus 33

Addendum: In paragraphs 2 and 4 above whenever I mention hazardous and toxic material it should be understood that waste is also included, i.e., hazardous

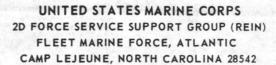
and toxic material and waste.

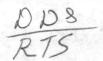


From: BMO TO: Dest List July: Hay & Tapie Mat. info Encl: (1) H 9 M C Hay Mat dufo. Transfers of 11 aug 62 The Enel & is submitted for your itso. J. I WOOTEN Ac/s For Bydirection









15/RHC/vao 6240 17 August 1982

From: Commanding Officer

To: Commanding General, Marine Corps Base, Camp Lejeune, NC

(Attn: Natural Resources and Environmental Affairs Branch)

Subj: Locating Chemical Agent Identification Sets

Ref: (a) CG, MCB ltr MAIN/DDS/th 6240 of 2 July 1982 w/enclosures

1. As requested by the reference, a complete search was conducted for the subject agent identification sets. A negative report is submitted.

R. H. CLAMPITT By direction

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15/RHC/vao 6240 17 August 1982

Filom:

Commanding Officer Commanding General, Marine Corps Base, Camp Lejeune, NC (Attn: Natural Resources and Environmental Affairs Branch) To:

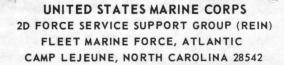
Subj: Locating Chemical Agent Identification Sets

(a) CG, MCB ltr Main/DDS/th 6240 of 2 July 1982 w/enclosures Ref:

1. As requested by the reference, a complete search was conducted for the subject abent identification sets. A negative report is submitted.

> R. H. CLAMPITT By direction





15/RHC/vao 4400 13 July 1982

From: Commanding Officer To: Distribution List

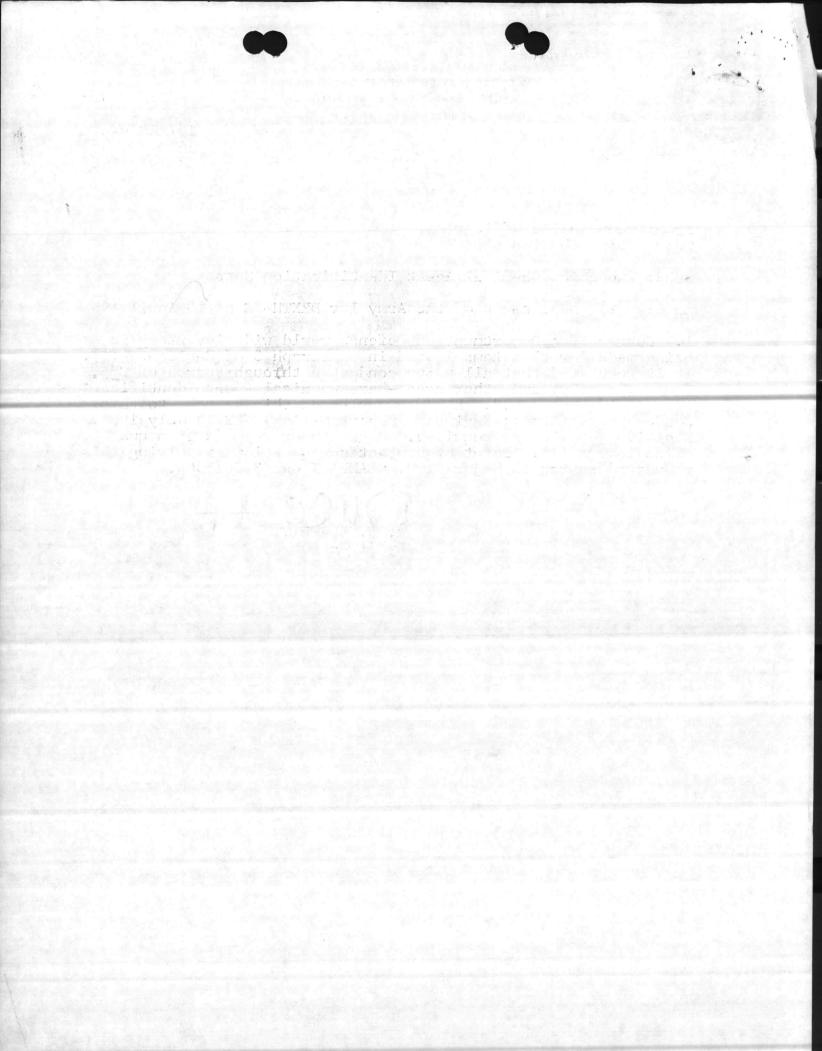
Subj: Location Chemical Agent Identification Sets

Encl: (1) Department of the Army 1tr DRXTH-SE of 15 April 1982

1. Currently a Department of Defense world wide inventory is being made for the items listed in paragraph 3 of Enclosure (1). It is requested that all units conduct a thorough search of NBC, armory, supply, and other areas where Chemical Agent Identification Sets could be located. Report results of this search, to this Headquarters (Attn: Engineer Support Office) NLT 23 July 1982. Negitive reports are required. Regret poor reproduction quality of Enclosure (1). Point of Contact for questions involving this requested search is Major R. H. CLAMPITT ext 3456/5506.

R. H. CLAMPIT By direction

Distribution: All Battalions









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

MAIN/DDS/th 6240

JUL 0 2 1982

From: Commanding General To: Distribution List

Subj: Locating Chemical Agent Identification Sets

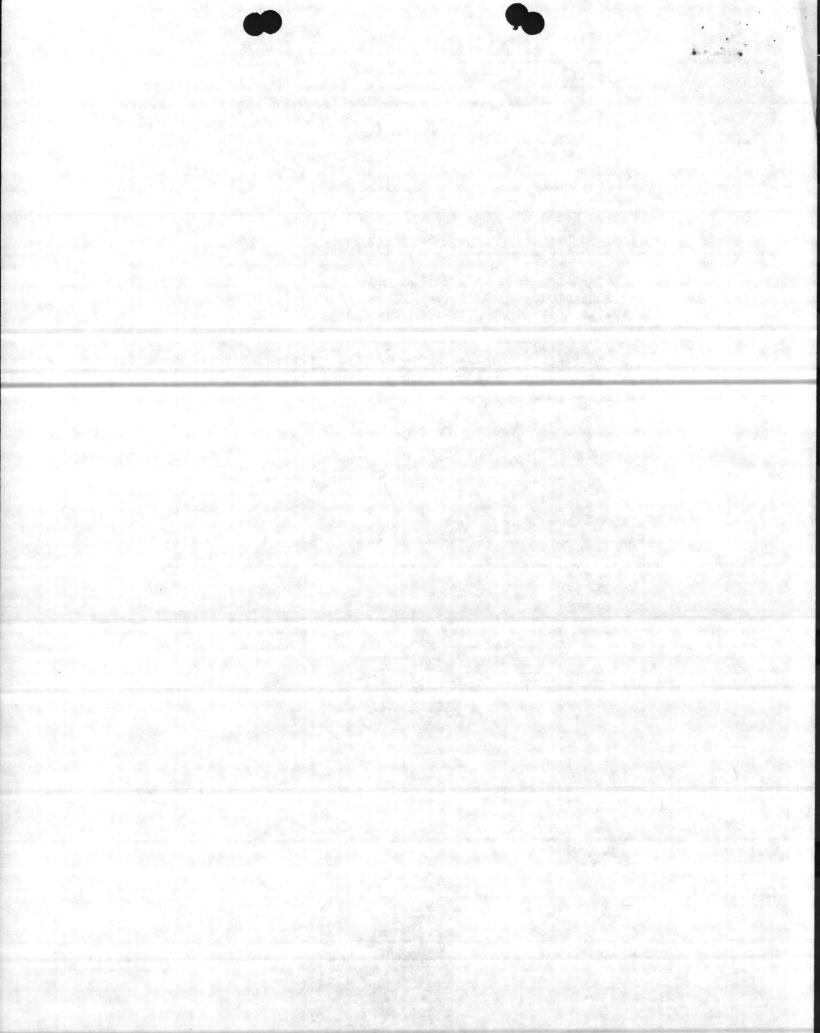
Encl: (1) CO LANTNAVFACENGCOM 1tr 114:SGO:aed 6280 of 14 Jun 1982

1. The enclosure provides information regarding disposal of the subject items. It is recommended addressees conduct a search for other subject items and advise this Command of type and quantity found. Negative reply requested.

2. Point of contact in this matter is Mr. Danny Sharpe, Natural Resources and Environmental Affairs Branch, Base Maintenance Division, extensions 2083/1690.

R. F. CALTA By direction

DISTRIBUTION
CG 2DMARDIV
CG 2DFSSG
CO MCAS(H), NR





PARTMENT OF THE NAVY

ATLANTIC DIVISION NAVAL FACILITIES ENGINEERING COMMAND NORFOLK, VIRGINIA 23511

TELEPHONE NO.
444-9565
AUTOVON 690-9565
IN REPLY REFER TO:
114:SGO:aed
6280

1 4 JUN 1982.

From: Commander, Atlantic Division, Naval Facilities Engineering Command

To: Distribution

Subj: Locating Chemical Agent Identification Sets (CAIS)

Encl: (1) Department of the Army 1tr DRXTH-SE of 15 April 1982

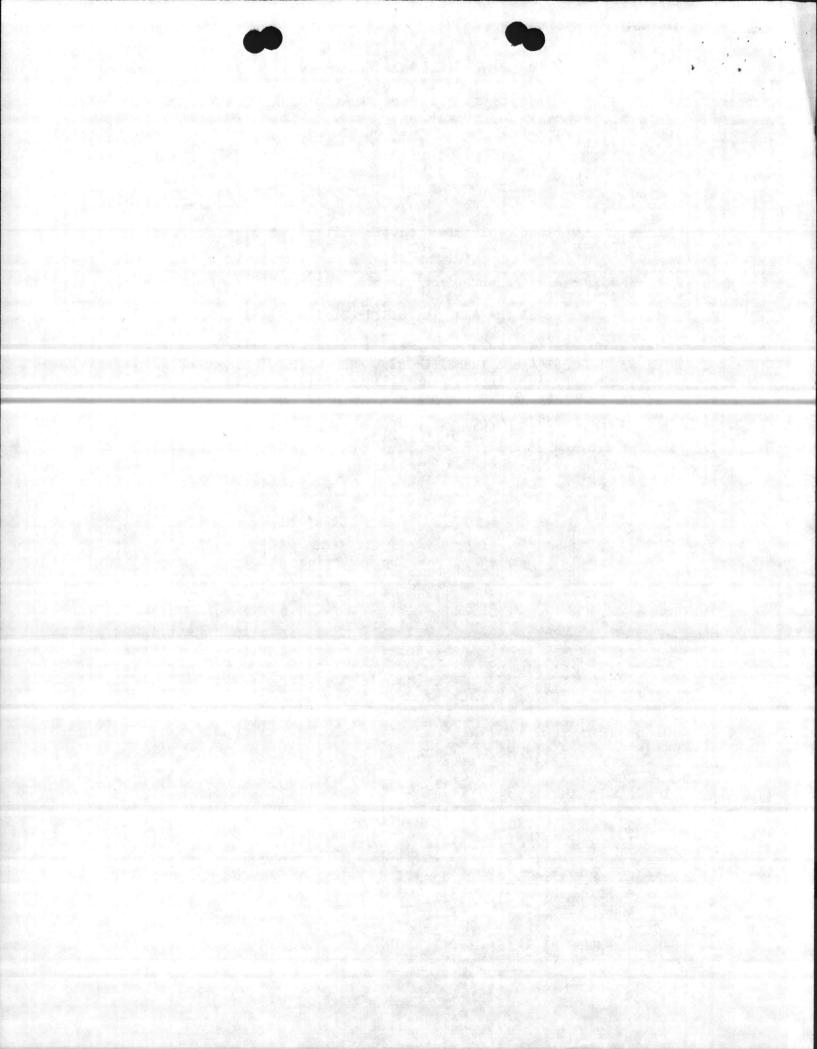
1. Enclosure (1) is forwarded to assist addressees in identifying and disposing of Chemical Agent Identification Sets (CAIS). Recommend addressees use information contained in enclosure (1) to conduct a final search for CAIS and if located advise the U.S. Army Toxic and Hazardous Materials Agency in accordance with enclosure (1).

2. Point of contact at this Command is Mr. Steve Olson, telephone (804) 444-9565. AUTOVON 690-9565 or FTS 954-9565.

J. R. BALLEY, P.E. By direction

Distribution: NAS OCEANA NAVPHIBASE LITTLE CREEK NAVFAC CAPE HATTERAS NAS NORFOLK PWC NORFOLK NAVSTA NORFOLK COMEODGRU TWO FLEASWTRACENLANT NORFOLK FLECOMBATRACENLANT VIRGINIA BEACH FITCLANT NORFOLK FLETRACEN NORFOLK AFXTRACTY CAMP PEARY NSC NORFOLK NSC CHEATHAM ANNEX NAVAIREWORKFAC CHERRY PT NAVAIREWORKFAC NORFOLK NAVSECGRUACT SABANA SECA NAVWPNSTA YORKTOWN NAVORDSTA LOUISVILLE

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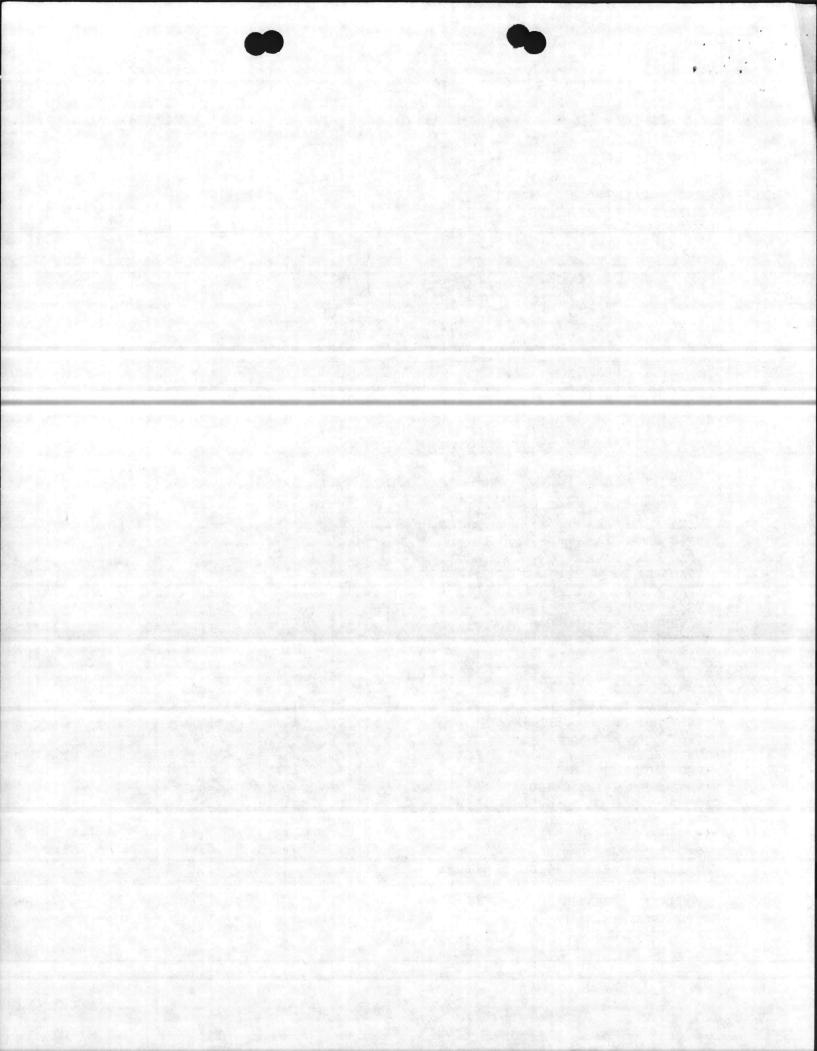


IT 6 0 NREA

114:SGO:aed 6280

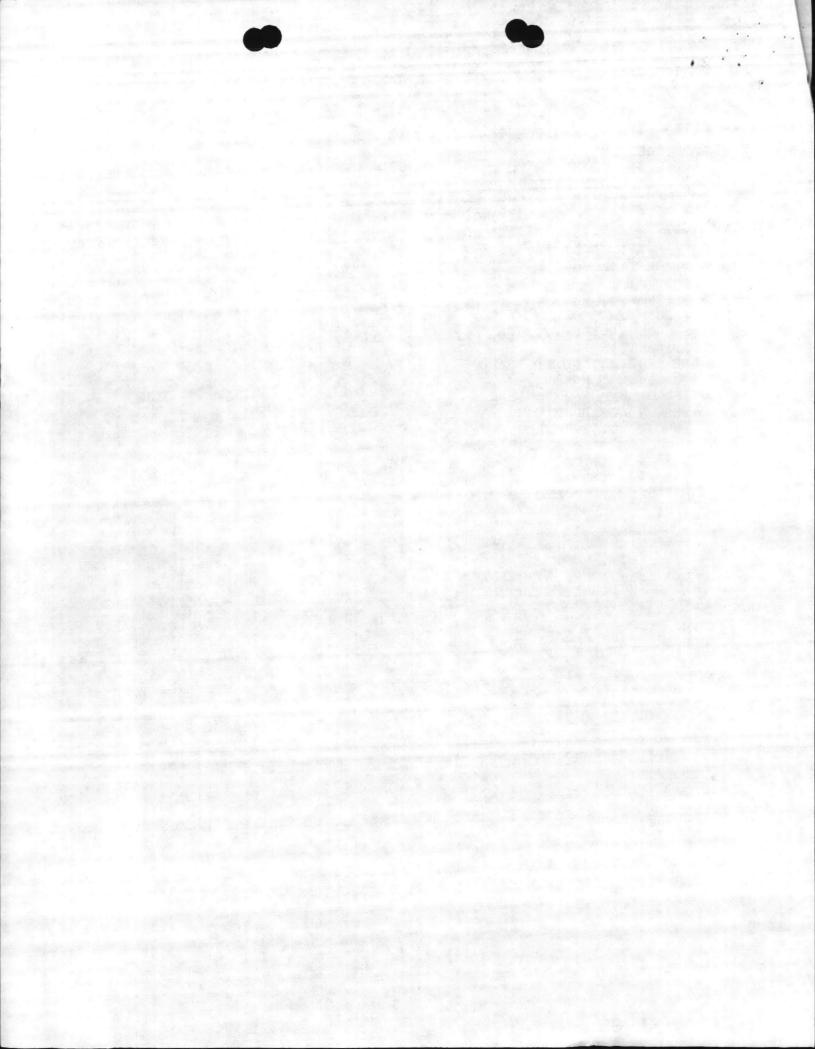
Distribution (continue) NORFOLKNAVSHIPYD PORTSMOUTH NAVREGMEDCEN PORTSMOUTH NAVSECGRUACT NORTHWEST NAVCAMSLANT NORFOLK MCAS H NEW RIVER CG MCAS CHERRY PT CG MCB CAMP LEJEUNE CG FMFLANT LANTFLT HEDSUPPACT COMD'T AFSC COMTACWINGSLANT COMOPTEVFOR NAVSTA ROOSEVELT ROADS NAVENVIRHLTHCEN NORFOLK NAVENPVNTMEDU COMNAVBASE NORFOLK COMCBLANT NAS BERMUDA NAF LAJES NAS GUANTANAMO NAVSTA KEFLAVIK NAVFAC ARGENTIA NAVFAC BERMUDA NAVFAC BRAWDY NAVFAC KEFLAVIK NAVSTA GUANTANAMO NAVAVNWPNSFAC ST MAWGAN NAVAVNWPNSFAC DET MACHRIHANISH NAVACTDET HOLY LOCH NAF MILDENHALL NAS SIGONELLA NAVSUPPACT NAPLES NAVSUPPACT NAPLES DET GAETA NAVSUPPO LA MADDALENA NAVSTA ROTA NAVSUPPACT SOUDA BAY NAVMEDRSCHU THREE CAIRO NAVENPVNTMEDU SEVEN NAPLES NAVSECGRUACT AUGSBURG NAVSECGRUACT EDZELL NAVSECGRUACT KEFLAVIK NAVSECGRUACT SAN VITO DET NORMANNI NAVSECGRUACT TERCEIRA ISLAND NAVCOMMSTA KEFLAVIK NAVCOMMSTA NEA MAKRI NAVCOMMSTA THURSO

(Continued on next page)



Distribution: (continue) NAVCOMMDET SOUDA BAY ADMINSUPU BAHRAIN INACTSHIPFAC PORTSMOUTH NAVSTA PANAMA CANAL LANTFLTWPNTRAFAC ROOSEVELT ROADS NAVSECGRUACT GALETA NAVCOMMSTA BALBOA NAVMMACLANT NORFOLK NARU NORFOLK NAVMARCORESCEN WHEELING NAVRESCEN BALTIMORE NAVRESCEN SOUTH CHARLESTON NAVRESCEN CUMBERLAND NAVRESCEN HUNTINGTON NAVMARCORESCEN NORFOLK NAVMARCORESCEN NEWPORT NEWS NAVRESCEN PARKERBURG NAVMARCORESCEN RICHMOND NAVMARCORESCEN ROANOKE NAVRESCEN STAUNTON NAVRESCEN LEXINGTON NAVMARCORESCEN LOUISVILLE MARCORESTRACEN BALTIMORE MARCORESTRACEN LYNCHBURG MARCORESTRACEN RICHMOND MARCORESTRACEN ROANOKE MARCORESTRACEN SOUTH CHARLESTON

COPY to:
CINCLANTFLT
CINCUSNAVEUR
COMNAVFACENGCOM
COMNAVAIRLANT
COMSUBLANT
COMTRALANT
COMNAVSURFLANT
COMOCEANSYSLANT
NAVRADSTA R SUGAR GROVE
COMNAVFORCARIB
COMFAIRCARBID
CMC
NAVENENVSA PORT HUENEME
CNARES NEW ORLEANS





US ARMY TOXIC AND HAZARDOUS MATERIALS AGENCY

ARMY TOXIC AND HAZARDOUS MATERIALS AGENC

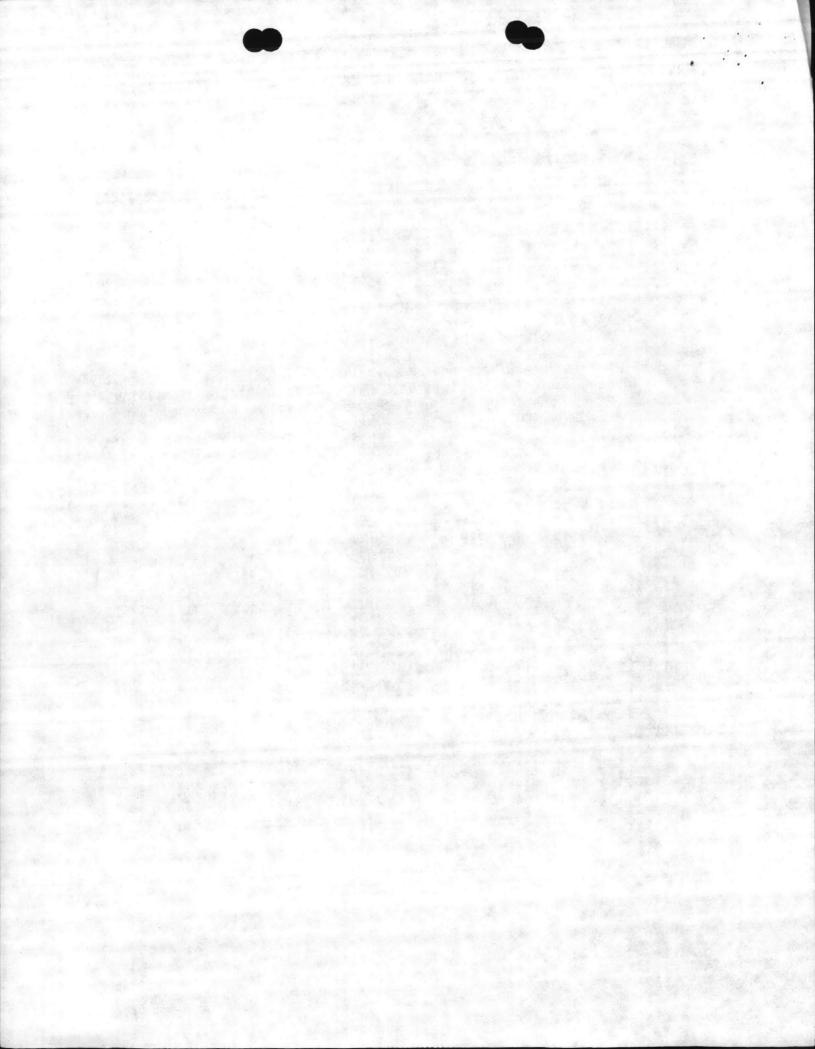
DRXTH-SE

15 APR 1982

SUBJECT: Final Effort for Locating Chemical Agent Identification Sets (CAIS)

SEE DISTRIBUTION

- 1. The US Army Toxic and Hazardous Materials Agency (USATHAMA) is currently involved in destruction of obsolete CAIS in the Department of Defense inventory. This operation is to be completed by December 1982 at the Rocky Mountain Arsenal (RMA), Commerce City, CO.
- 2. Although all known stocks of these sets were shipped from world-wide locations in June 1980, small numbers of sets continue to be discovered in locations such as National Guard Armory storage areas and moth-balled naval vessels. The most cost effective way to dispose of these sets in accordance with Public Laws 91-121 and 91-441 is in the RMA demilitarization facility. Since that facility is intended to be decommissioned early in 1983, at the conclusion of current operations, it is requested that one final search of your inventories be made to identify any remaining sets. If sets are found, it is requested that you advise this Agency not later than 1 August 1982 so arrangement can be made to transport them to RMA for disposal.
- 3. To assist your search, nomenclatures of these sets are provided as follows:
- a. Training Set, Chemical Agent Identification, M72 (CAITS), FSN 1365-051-1807, DODAC Code K945 (Box 12" X 5 1/2" X 4").
- b. War Gas Identification Set, Instructional, M1, FSN 1365-368-6154, DODAC Code K955 (Large Box 30 3/8" X 15 1/2" X 11 3/4").
- c. Set Gas Identification, Instructional (NAVY): HN and Set Sample Replacement, FSN 1365-038-5183 and FSN 1365-608-5322 thru 1365-608-5329, DODAC Code X302 and X545 through X552 (Box 7 1/2" X 16" X 11 3/4").



DRXTH-SE

SUBJECT: Final Effort for Locating Chemical Agent Identification Sets

- d. Toxic Gas Set, HD, M1, FSN 1365-219-8574, DODAC Code K941 (Pig).
- e. Toxic Gas set, HD, M1, FSN 1355-563-4146, DODAC Code K942 (Pig or 10gallon pail).
- f. War Gas Identification Set, Instructional, M1, FSN 1354-025-3273 and FSN 1365-025-3283, DODAC Code K951 and K952 (Pigs).
- g. War Gas Identification Set, Instructional, AN-MIA1, FSN 1365-323-7728 and FSN 1365-338-0735, DODAC Code K953 and K954 (Pigs).
- 4. These sets can be found packaged in wooden boxes or in cylindrical steel shipping containers referred to as pigs. The sets are shown in the inclosed. photographs. Both boxes and pigs are usually painted gray, blue, Army olive drab or black. Print on them is typically in black, green or yellow and usually refers to manufacture at Edgewood Arsenal, MD.
- 5. Points of contact for questions involving reporting, transporting and identification of these sets are Mr. William Brankowitz, USATHAMA, AV 584-2424/2556 or LT Lucas Polakowski, Technical Escort Unit, Edgewood Area of Aberdeen Proving Ground, AV 584-4381/3516.

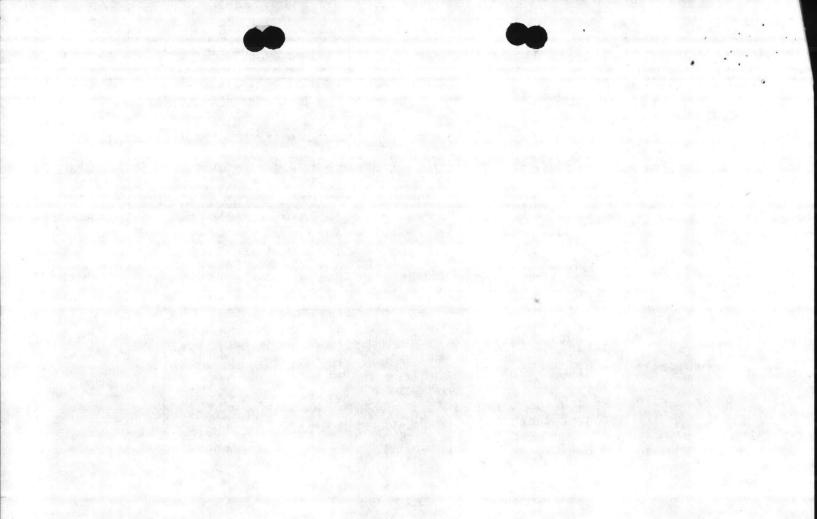
2 Inclosures

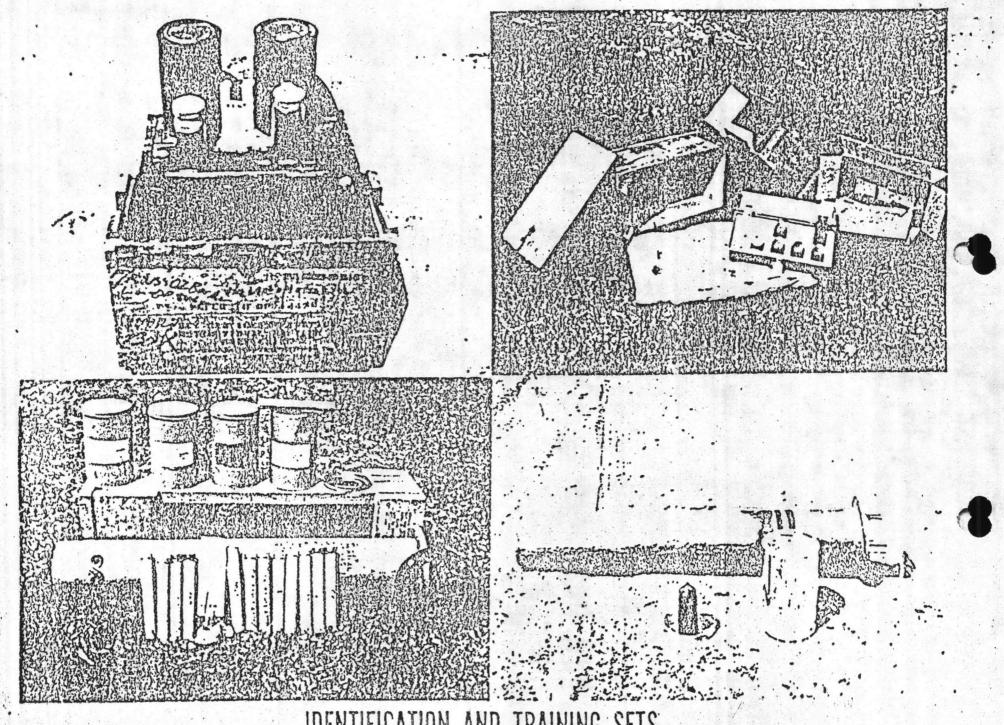
Photo, Identification and Training Sets

Photo, Navy Bunker w/Cylinders & Boxes JOHN D. SPENCE

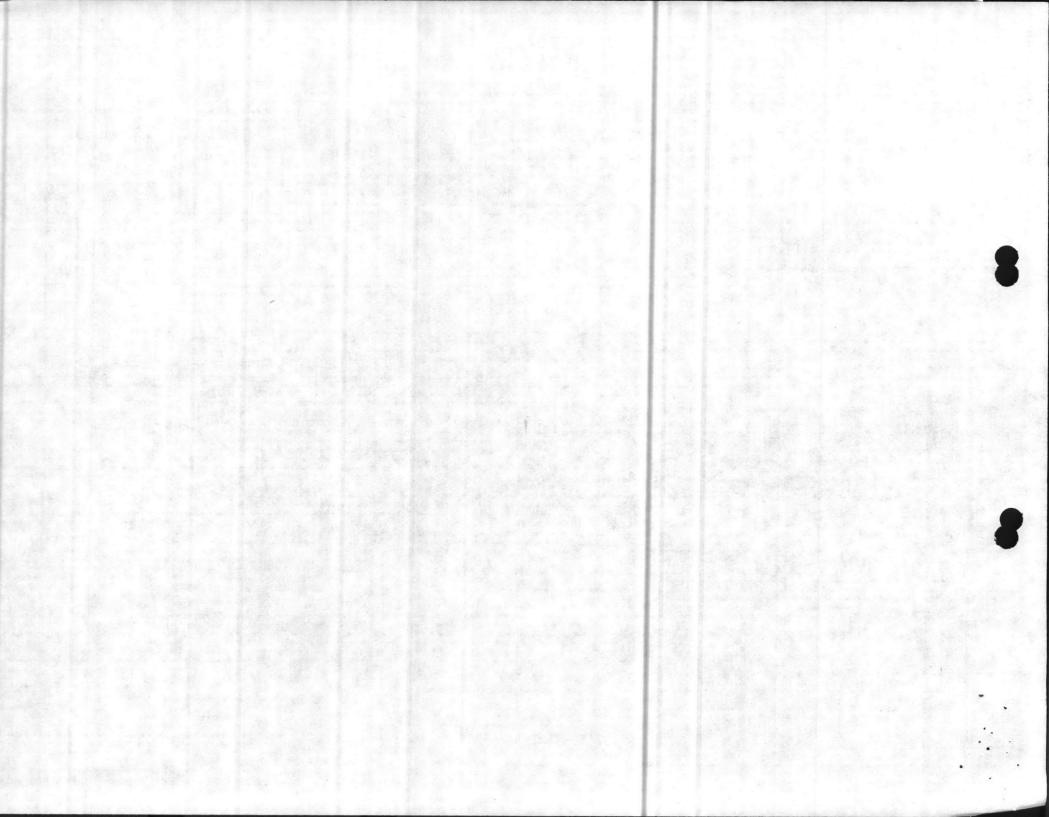
Colonel, CmlC

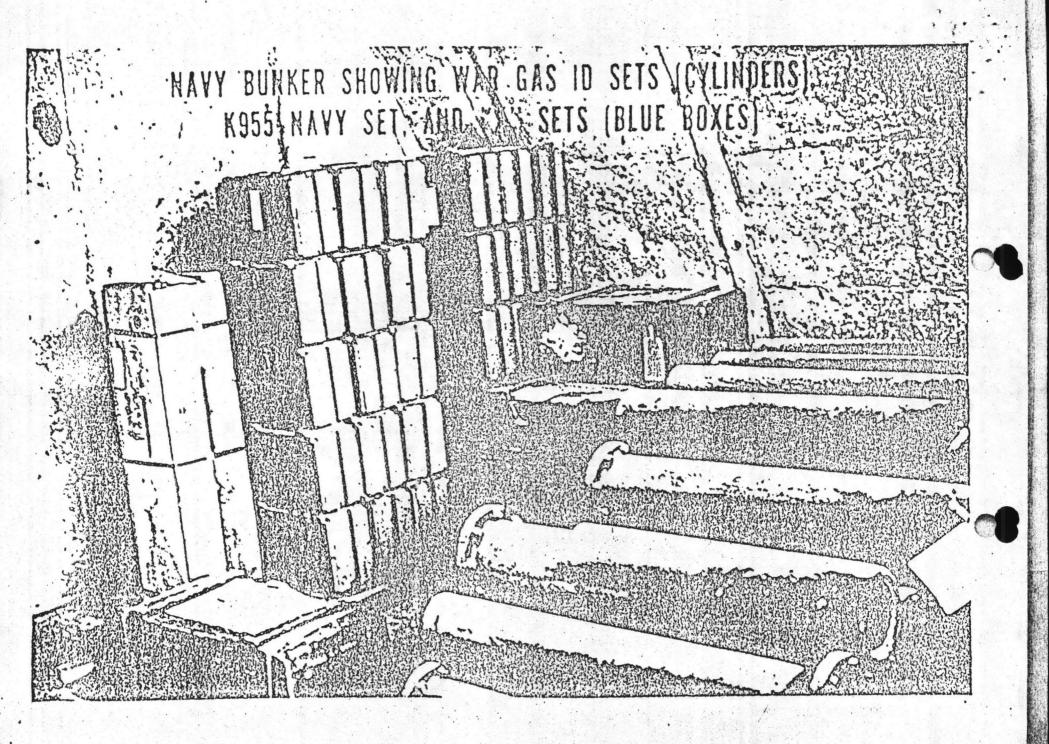
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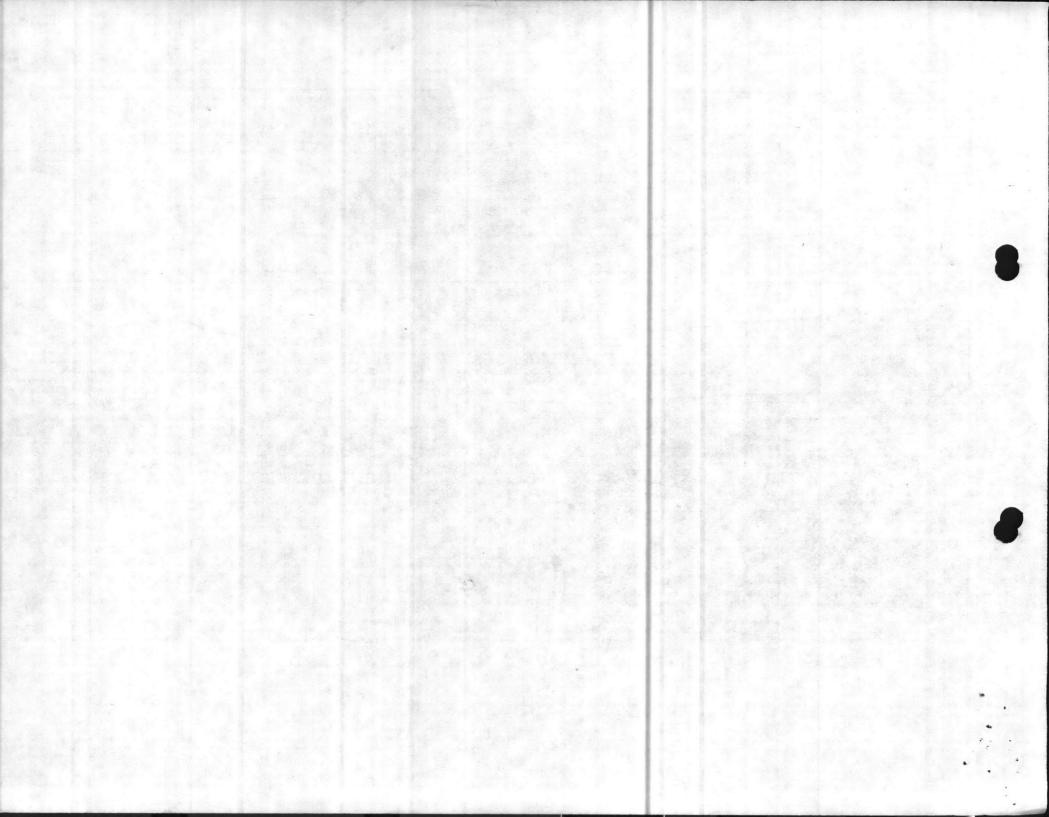




IDENTIFICATION AND TRAINING SETS







UNITED STATES MARINE CORPS
HEADQUARTERS AND SERVICE BATTALION
2D FORCE SERVICE SUPPORT GROUP (REIN)
FLEET MARINE FORCE, ATLANTIC
CAMP LEJEUNE, NORTH CAROLINA 28542

3/ARD/ARD 3400 5 Aug 1982

FROM: COMMANDING OFFICER

To: COMMANDING OFFICER, 2D FORCE SERVICE SUPPORT GROUP (REIN)

(ENGRSUPO)

SUBJ: LOCATION CHEMICAL AGENT IDENTIFICATION SETS

REF: (A) CO, 2DFSSG LTR 15/RHC/VAC 4400 DTD 13 JULY 1982

1. IN RESPONSE TO THE REFERENCE, A NEGATIVE RESPONSE IS HEREBY SUBMITTED.

G. R. THORPE By DIRECTION

COPY: BN NBCO

HOTIATTA BOTVER ONA FEETHAUDCA Solice Standard Control (NITE) and Control (NITE) LOT CALINE PROES, ATLANTIC AME LEUFLING, LOUT AROLINA SUSK 2 LOUI: Combant INC. CARLEGE CombArting Cartering Company (Nervice Service Service Service) CUBU: LOCATION CERTOAL AGENT TOWNSTICATION SETS SEE har in der Poules fo the headlines, whis satisficities is head · aTTIMaU COLTOSHIC Y



UNITED STATES MARINE CORPS

8th Communication Battalion 2D Force Service Support Group (REIN) Fleet Marine Force, Atlantic Camp Lejeune, North Carolina 28542

> KJK/dee 4400

23 Jul 1982

From: Commanding Officer

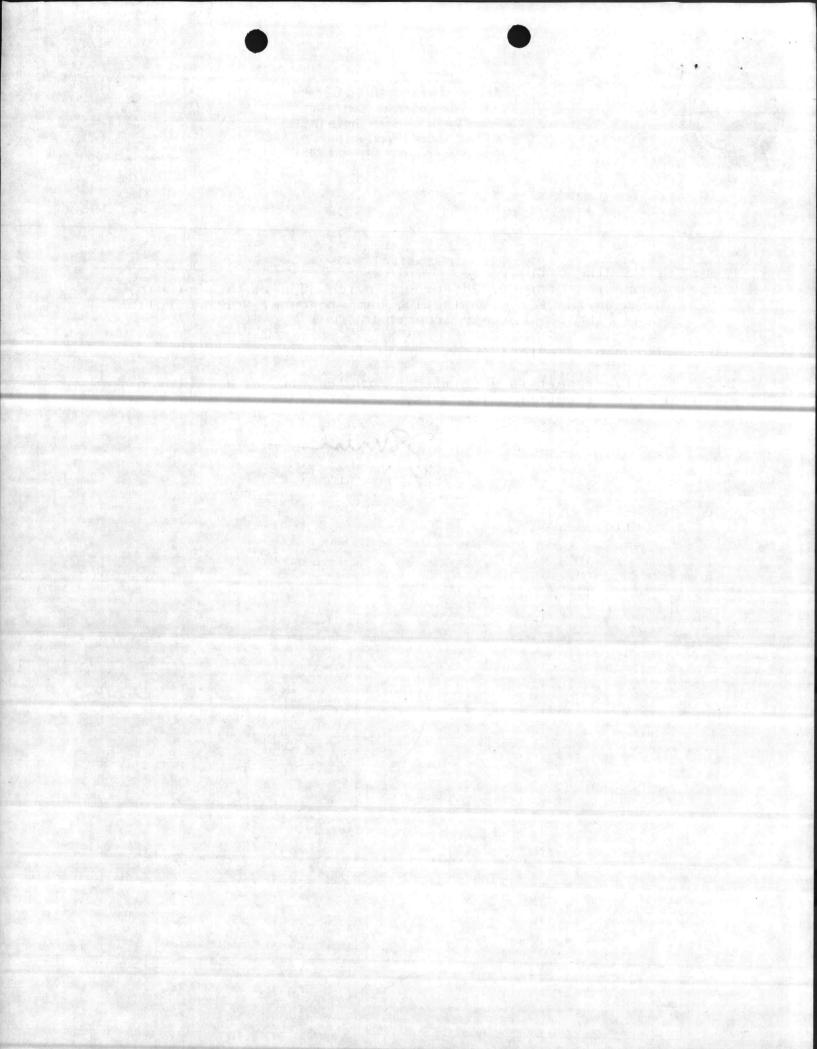
Commanding Officer, 2d Force Service Support Group (Rein), Fleet Marine Force, Atlantic, Camp Lejeune, North Carolina 28542 (Attn: Engineer Support Office)

Subj: Search of Chemical Agent Identification Sets

1. A negative report is submitted as the results of the search for chemical agent identification sets.

Copy to: S-1

File S-3





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

4/LS/rth 4400 27 July 1982

From: Commanding Officer

To: Commanding Officer, 2d Force Service Support Group {REIN}

{Attn: Engr Spt Officer, MAJ R. H. CLAMPITT}

Subj: Location Chemical Agent Identification sets

Ref: {a} CO, 2d FSSG 1tr 15/RHC/vao over 4400 dtd 13 July 1982

By direction

In accordance with the reference, a negative report is submitted.

Copy to: S-3 Officer

UNITED STATES MARINE CORPS 2d Force Reconnaissance Company 2d Force Service Support Group (Rein) Fleet Marine Force, Atlantic Camp Lejeune, North Carolina 28542

04/JJL/jj1 4400 26 July 82

From: Commanding Officer

To:

Commanding General, 2d Force Service Support Group (Rein) Fleet Marine Force, Atlantic, Camp Lejeune, North Carolina

28542 (Attn: EngrSptO/OPS-8)

NBC Inventory Subj:

(a) 2d FSSG 1tr 15/RHC/vho over 4400 dtd 13 July 82 Ref:

1. In accordance with reference (a), a negative report is submitted.

C. GRABOWSKY

Carlada

By direction

Todos Jesemaisanes Panas Todos Panas Suces Survivas Section (Anthew Yours) Committee Tanking office to a late of the control of the cont Sigforco Comvice Assorb Comp.(Gris) & Affabbia, Demo Versune, Worth Carolina Palabaya

UNITED STATES MARINE COSPS 2d Radio Battalion Fleet Marine Force, Atlantic Camp Lejeune, North Carolina 28542

4/FBH/flh 4400 23 July 1982

From: Commanding Officer

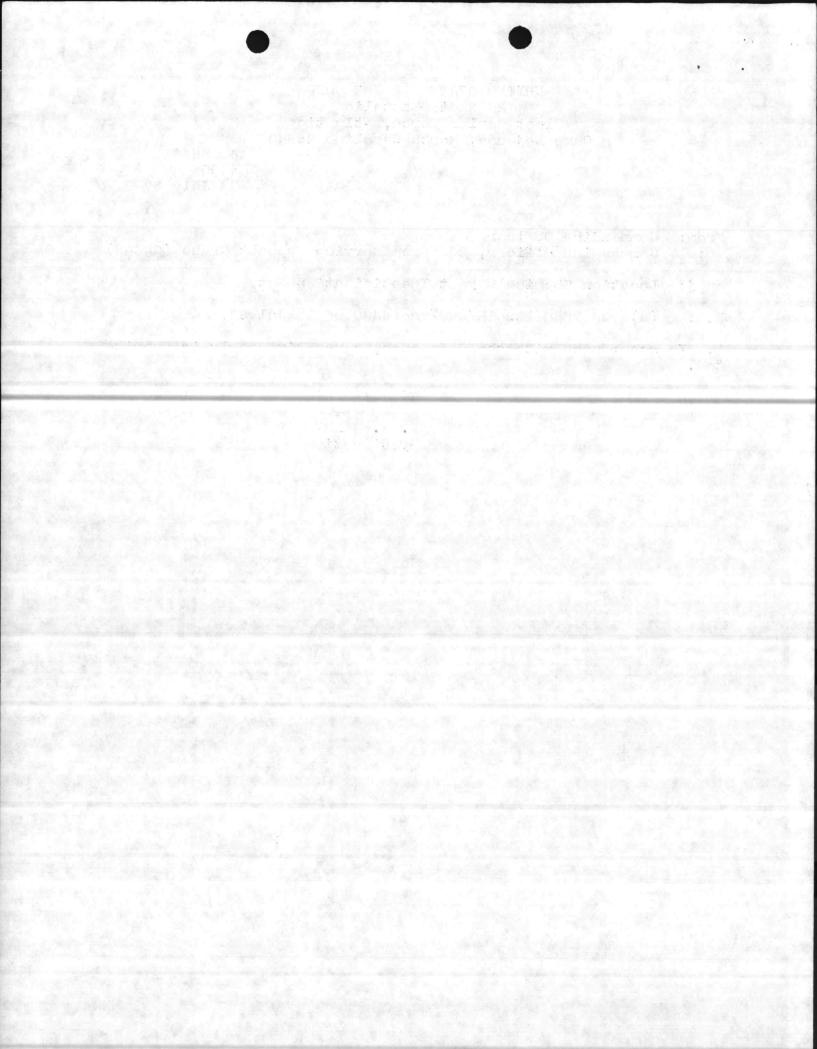
To: Commanding Officer, 2d Force Service Support Group (OPS-8)

Subj: Location Chemical Agent Identification Sets

Ref: (a) 2d FSSG 1tr 15/RHC/vao 4400 of 13 Jul 82

1. In accordnace with the reference, a negative reply is submitted.

FB Harris
By direction



UNITED STATES MARINE CORPS 8th Engineer Support Battalion 2d Force Service Support Group (Rein) Fleet Marine Force, Atlantic Camp Lejeune, North Carolina 28542

03/RTW/res 4400 20 Jul 1982

Commanding Officer From:

Commanding Officer, 2d Force Service Support Group (Rein), To:

Fleet Marine Force, Atlantic, Camp Lejeune, North Carolina

28542 (Engr Supt Office)

Sub j: Chemical Agent Identification Sets

(a) CG, 2d FSSG 1tr 15/RHC/vao over 4400 dtd 13 Jul 1982 Ref:

1. In accordance with reference (a), a negative report is submitted.

By direction

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1. . . .



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

3/TJG/crw 4400 22 July 1982

From: Commanding Officer

To: Commanding Officer, 2d FSSG (Attn: Engineer Support

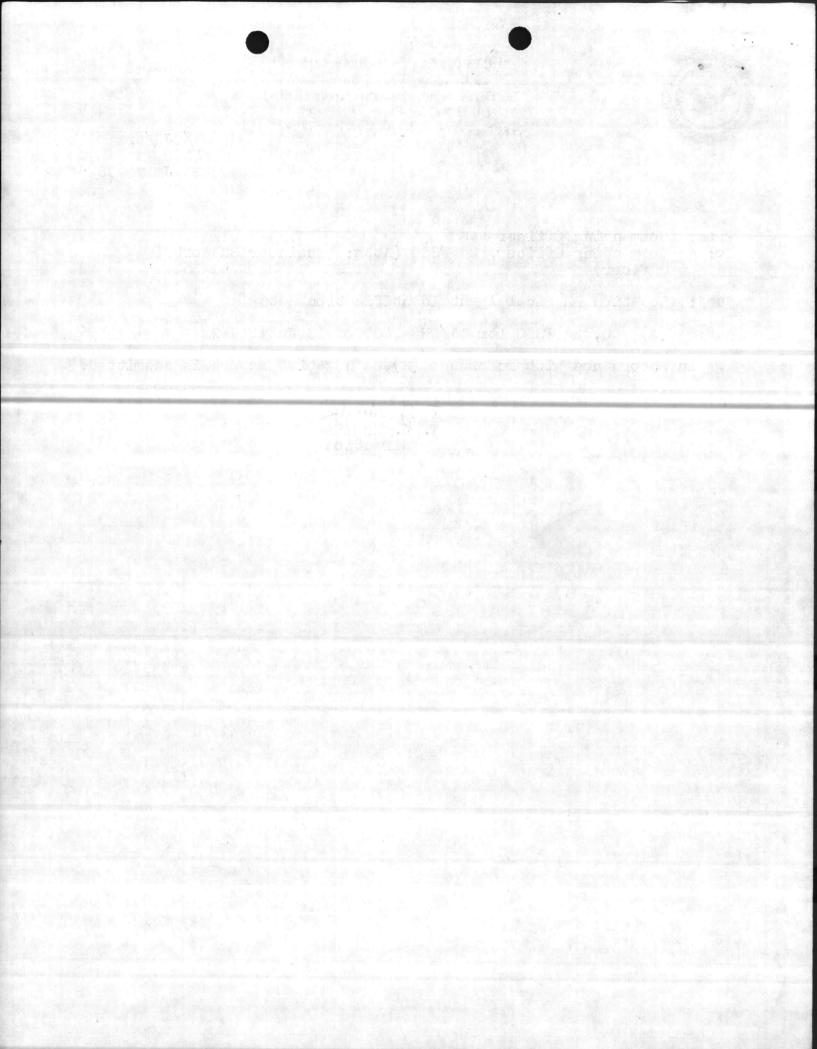
Officer)

Subj: Location Chemical Agent Identification Sets

Ref: (a) CO, 2d FSSG ltr 15/RHC 4400 of 13 July 1982

1. In accordance with reference (a), a negative report is submitted.

T. J. GRESKA By direction





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

IN REPLY REFER TO 40:MTG:srp 4400 16 July 1982

From: Commanding Officer, 2d Dental Battalion
To: Commanding Officer, 2d Force Service Support Group (REIN), FMFLant,

Camp Lejeune, NC 28542

Subj: Location Chemical Agent Identification Sets

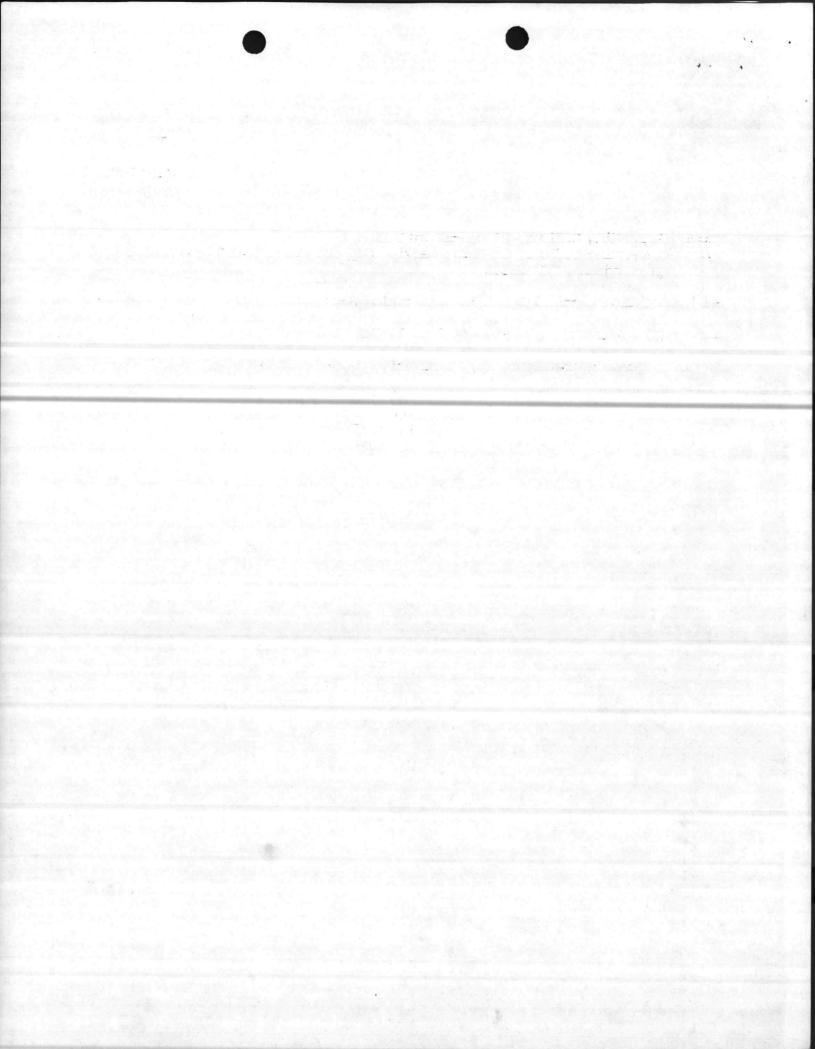
(a) Your ltr 15/RHC/vao 4400 of 13 July 1982

1. In response to reference (a), a negative report is submitted.

M. T. GRABBE

MT Gabbe

By direction



UNITED STATES MARINE CORPS 2d Air and Naval Gunfire Liaison Company Fleet Marine Force, Atlantic Camp Lejeune, North Carolina 28542

3/PJG/kbp 4400 11 Aug 1982

From: NBC Officer

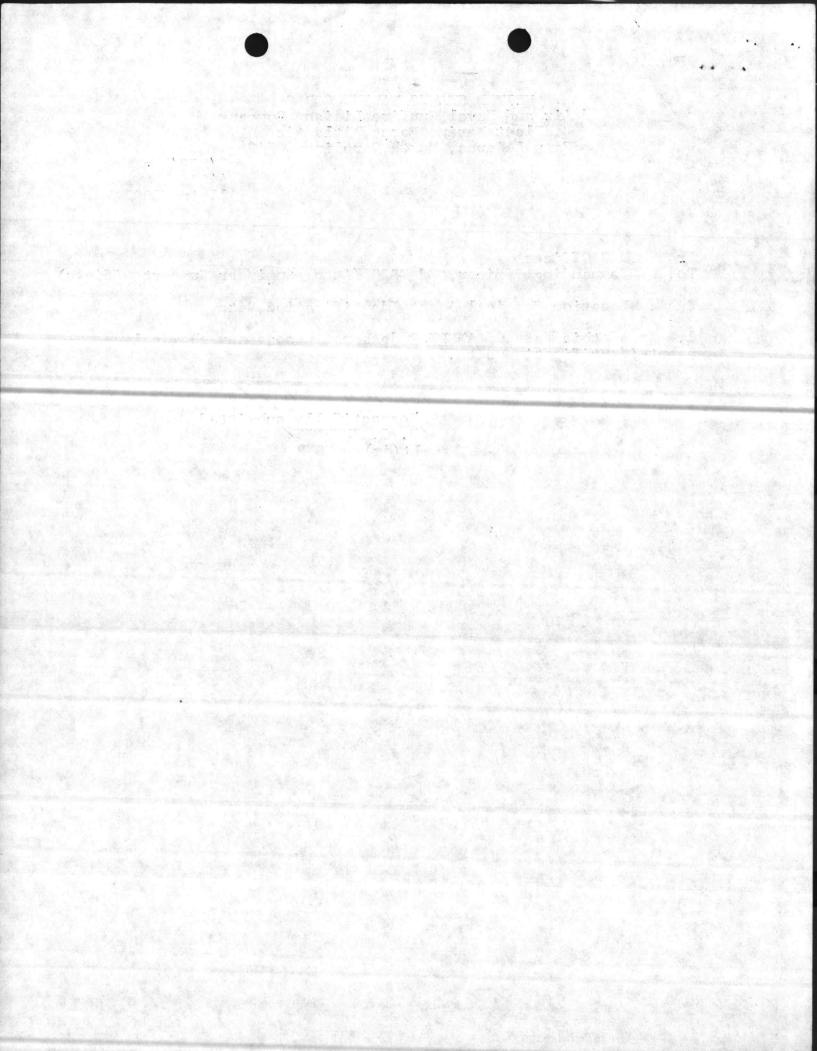
To: Commanding Officer, 2d FSSG (Attn: Engineer Support Officer)

Subj: Location Chemical Agent Identification Sets

1. As of this date 2d ANGLICO does not posess any chemical agent identification sets.

P. J. GRIFFIN

Lt(jg) USNR



MED?

3/WDB/kjb 4400 5 August 1982

From: NBC Chief

Commanding Officer, 2d Force Service Support Group (REIN), Fleet Marine To:

Force, Atlantic, Camp Lejeune North Carolina 28542 (Autn: Maj. Clampitt)

Subj: Location Chemical Agent Identification Sets

(a.) CG Ltr dtd 13 July 1982 Ref:

In accordance with the reference, a negative report is submitted.

3/408/10.10 1440 1460an 10

From: APQ Object

To: Commente Cirio.r. Id Force Strvice Servort Group (FIT), Heet Merine

Force, Clarifo, warp actions to it corrected to SAP. (A but is a Reptil

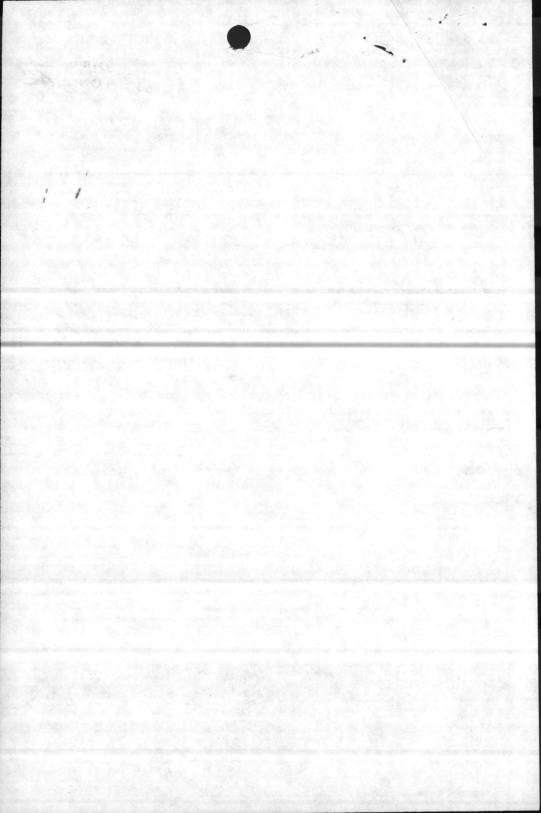
Subjection Chemical Agent ToomtineLieution Sets

: Ref: (a.) 02 Itr Old 13 July 1982

in accordance with the purerect, a very two records and

H. D. BUTTORT

NATURAL RESOURCES AND ENVIR ENTAL AFFAIRS BASE MAINTENANCE DIVISION Bmo -MARINE CORPS BASE ABMO BLK CAMP LEJEUNE, NORTH CAROLINA 28542 8-16-82 Date From: Director
To: BMO 1. attached was received from Paul Hubbell this date. I recommend we send a copy to AC/S Fac and AC/S Logistics) Dreneral Sheen says what WREA has been saying for sometime. Julian Nethal. Ago Th





UNITED STATES MARINE CORPS

MARINE CORPS AIR STATION (HELICOPTER) NEW RIVER, JACKSONVILLE NORTH CAROLINA 28545

222/MW/mc 6280 12 Aug 1982

Commanding Officer From:

To:

Commanding General (AC/S, Facilities], Marine Corps Base,

Camp Lejeune, North Carolina 28542

Reporting of Hazardous Material Spills Subi:

(a) BO 11090,1B Ref:

1. It has come to the attention of this Command that a mercury spill occurred within the Air Station heating plant on 19 July 1982. Personnel from the Base Safety Office and the Industrial Hygiene Section, Naval Regional Medical Center, responded to contain and clean up the spill.

While it is recognized that the heating plant is under the cognizance of the Base Maintenance Officer, it is perceived that being within the confines of the Air Station, the Commanding Officer, under the Resource Conservation and Recovery Act, remains responsible for hazardous waste operations and incidents on the Station.

3. It is requested that in the event future spills occur within Marine Corps Base operations aboard the Air Station, they be reported to the Station S-4 Office during working hours, or the Station Officer-of-the-Day after working hours, as set forth in enclosure (2) of the reference,

Internal break down - util didn't notify Freder

Copy to: Base Maintenance Officer

12 Aug 1982

and a company of the company of the

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For: (a) The List that

I. It is a compact of the experience of the expe

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o. To is connected the second with its connected to the real second of the control of the contro

DATE: 11 Aug 82

FROM: Paul Hubbell

TO: Mr. Julian Wooten, Director Natural Resources

SUBJ: Information Transfer

Enel: (1) DLA Commander's Guidance Statement #8 of 7Jul 82 (2) Scruba Dubster product literature

1. Enclosure (1) indicates a definite commetment by DPDS

to have its Regions and Deforse Property Disposal Office.

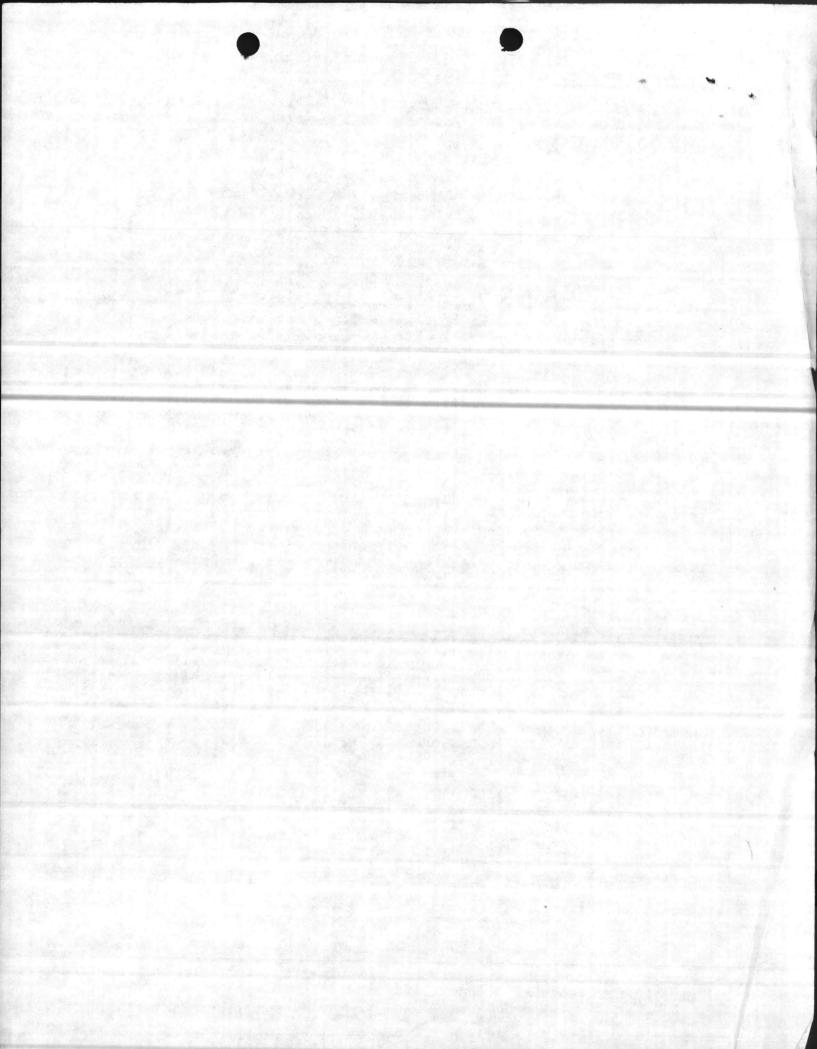
" step Grund and fully accept [their] responsibility
in the disposal of Layardons and toxic materials".

This document way be baseficial to you in dealing with
reluctant DPDO's.

2. As a point of interest, and possible future concern.

I recortly found out that the DoD philosophy of delaying the designation of an item as a hazardony wrote vice a hazardons material (until all avenues for sale on reuse are explored - thus delaying the 90 day storage clock) is now being challenged by certain state (notably TX and CA).

3. you may wish to pass enclosure (2) to the maintenance officer for his information/use.





REFER TO

DPDS-D

DEFENSE LOGISTICS AGENCY
DEFENSE PROPERTY DISPOSAL SERVICE
FEDERAL CENTER
BATTLE CREEK, MICHIGAN 49016

N 49016

7 June 1982

COMMANDER'S GUIDANCE STATEMENT (CGS) NO. 8

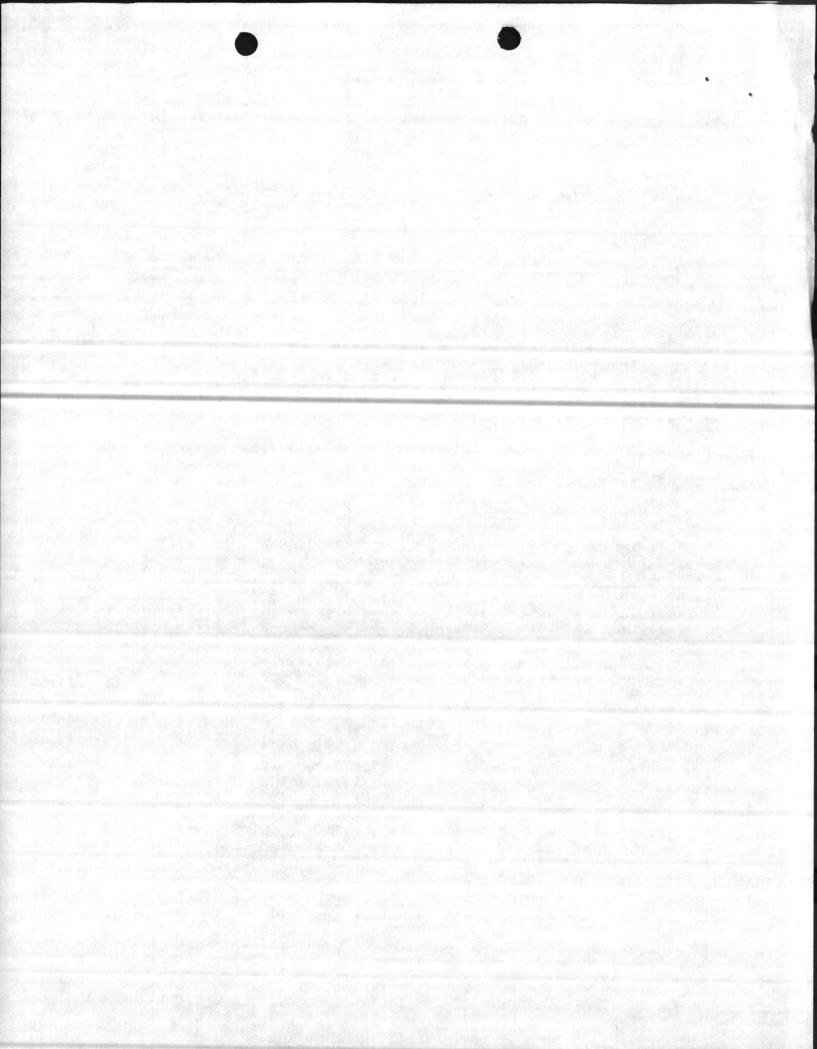
SUBJECT: Custody of Hazardous and Toxic Material

ACTION AGENCY

SUSPENSE

- 1. For some time now this Command has been charged with the mission of disposing of hazardous and toxic materials and waste. We have worked diligently to determine our responsibility and to help develop the DoD policy. As I am sure you are aware, the DoD policy concerning who will maintain custody of hazardous and toxic material and waste is clear. In a nutshell that policy is that if the DPDO has conforming storage the DPDO will accept accountability and custody. If the DPDO does not have conforming storage and the generator does; the DPDO accepts accountability and the generator maintains custody. If neither the generator nor the DPDO have conforming storage then whoever has the most nearly conforming storage maintains custody. If agreement cannot be reached as to who has the most nearly conforming storage then the decision will be raised through command channels to DoD for a decision.
- 2. Having said all of that my concern now is that we may not have made an honest effort to accept custody of hazardous and toxic material when we do in fact have the necessary conforming storage or when our storage is as nearly conforming as the generator. This is becoming a problem between DPDS and the services; as a result, we have agreed that we will develop a check sheet for use at the installation level to determine who has the most nearly conforming storage. It is invisioned that this check sheet will be executed by the installation commander. I support this process because the installation commander is the one responsible for storage of hazardous and toxic materials by all tenants to include the DPDO.
- 5. Prior to the formal execution of this check sheet which is a few months away, I want each DPDO to reevaluate with his host those items which can be stored safely and without danger of spill in the DPDO area. In those cases where an item is designated by Table 5-5 of DoD Regulation 4145.19-R-1 to be stored in a general purpose warehouse I expect that we will take physical custody unless we do not have a general purpose warehouse.

Fncl 1



DPDS-D

PAGE 2

SUBJECT: Custody of Hazardous and Toxic Material

7 June 1982

DPDS-H

DPDO

DPDR

1 Oct 82

30 Jun 82

Continuous

As Required

4. Bottom line is that the time has come for us to step forward and fully accept our responsibility in the disposal of hazardous and toxic materials. Acceptance of physical custody when feasible and possible is critical to identification of the waste stream and help us to learn to properly store this material. One final thought, I am concerned that in some cases when we have accountability but not custody that we lapse into the feeling "out of sight, out of mind" and since the property is not within the DPDO we do not move as quickly as we should to dispose of the property. We need to be sure that is not the case.

ACTION SUSPENSE

5. Directed actions:

- a. Development of check sheet.
- b. DPDOs should make contact with their host to insure that the attitude of cooperation, not confrontation exists at the PDO level. Problems beyond resolution at the DPDO, DPDR level should be surfaced to DPDS-H.
- c. DPDRs should assist DPDOs in making determinations concerning ability to store hazardous and toxic materials.

HENRT G. SKEEN Brigadier General, USA Commander

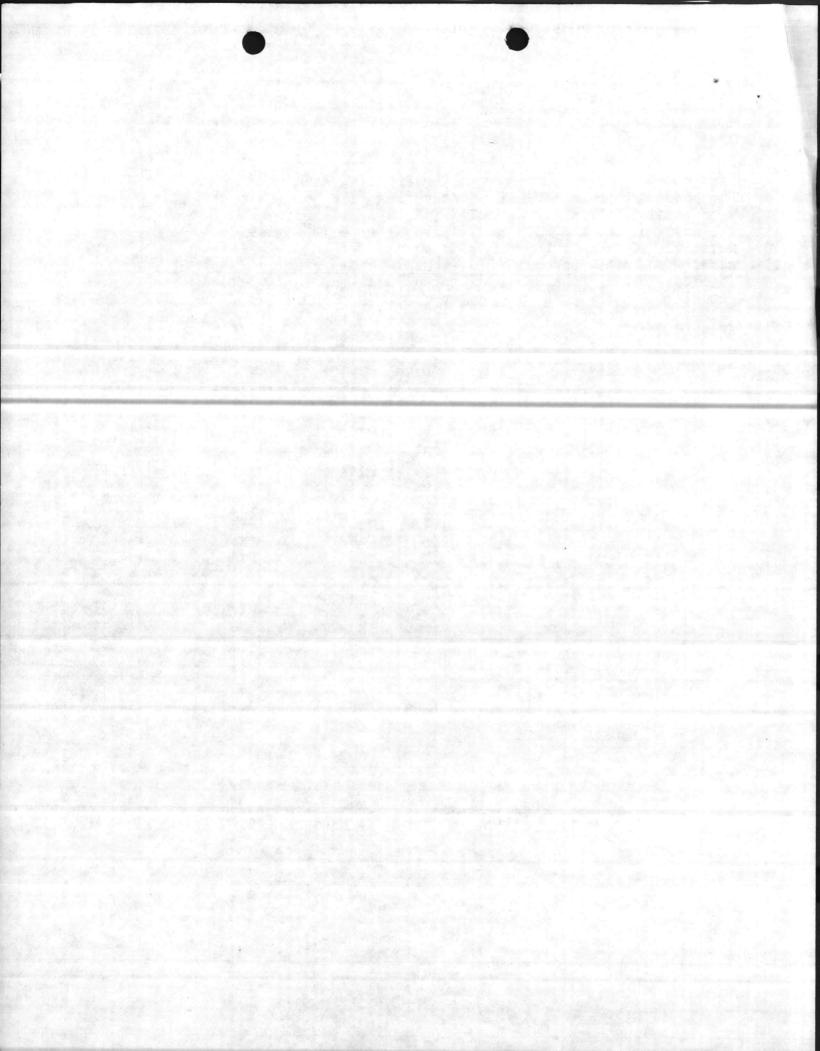
DISTRIBUTION:

B1-B3

DD minus 33

Addendum:

In paragraphs 2 and 4 above whenever I mention hazardous and toxic material it should be understood that waste is also included, i.e., hazardous and toxic material and waste.



J. BANKS HUDSON, INC.

ScrubaDubster

BANKS HUDSON (202) 244-7103 4714 SEDGWICK STREET, N. W. WASHINGTON, D. C. 20016

Specifically engineered by the "old pros"...

Shoots on site for clean dumpster containers

Obviate Container Nuisance
Prolong Container Life
Enhance Container Cleanliness







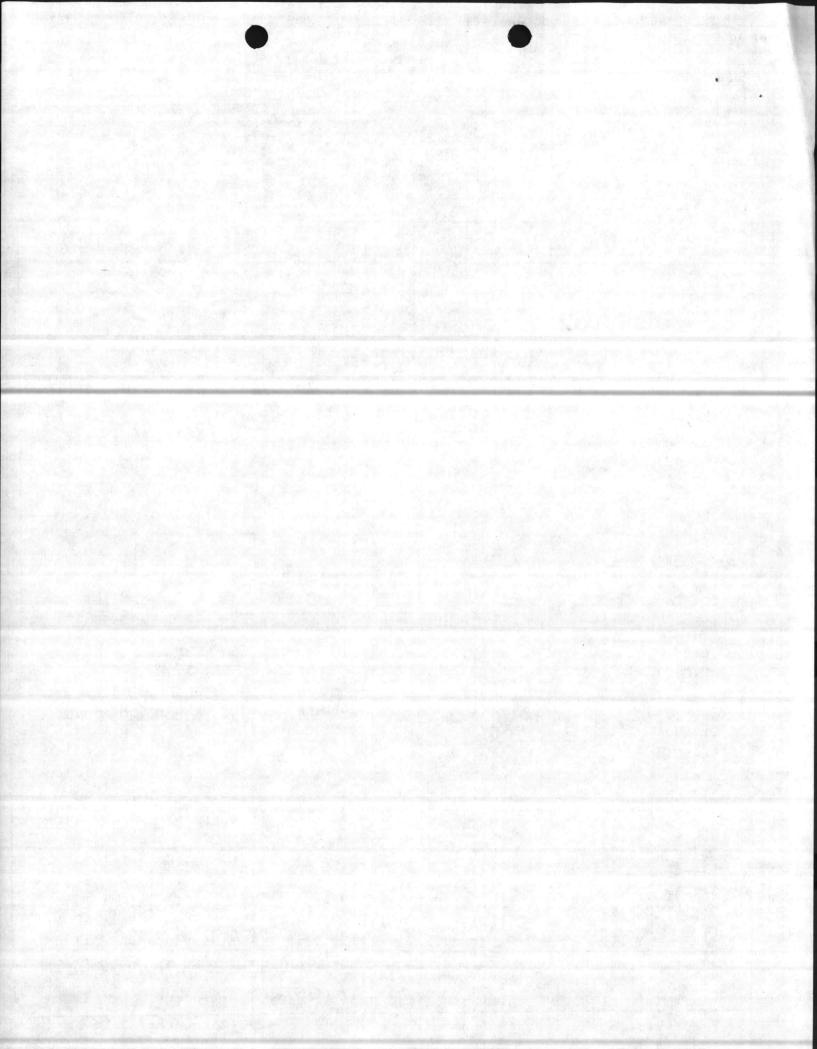




Rear Load (RLP) Containers Front Load (FEL) Containers Hoist Haul (Arm-Chain) Containers Truck Mounted Hauling Equipment Container Sites

USN "FPB" Fast Pay Back USA "QRIP" Quick Return on Investment Program

USAF "FASCAP" Fast Capital Amortization Program



ScrubaDubster - Model 1500

Matter Condition

SPECIFICATIONS

HOT HIGH PRESSURE WASHER:

Discharge - 5 GPM 300 GPH

Pressure—1500 PSI, adjustable

Hose-80' High Pressure Hose standard

Pump - Triplex design with lubricated crosshead - withstands extended periods of no-water useage.

Trigger Gun-"Deadman" type, cool grip

Discharge Temperature -- Adjustable to 210°F

Burner - 460,000 BTU Input

Ignition - Aircraft magneto, constant

Fuel Type-Kerosene, No. 1 or No. 2 Diesel

Fuel Tank-8 hour capacity

Fuel Consumption - Burner - 3.0 GPH

Chemical Feed - High pressure and low pressure standard, both systems calibrated.

24 H.P.-2 cylinder standard, air-cooled gasoline, electric start. (See Options)

- 43

TO BEST STORES

VACUUM SYSTEM:

Air Flow-150 CFM

Maximum Vacuum - 27" Mercury

Hose Length - 50' x 3" I.D. Standard

Wand-5' with Three Heads

WATER TANKS:

Type - Dual Tank Design

Capacity-500 gallons each

Interior - Baffled

SPECIAL FEATURES:

- · Electric clutches permit independent or simultaneous operation of vacuum system and pressure washer.
- · All tanks have liquid indicators.
- Pressure hose mounted or hose reel.
- Skid mounted.

OPTIONS:

Engines - 30 HP 4 Cylinder Gasoline, air-cooled

Diesel engines per customers specifications

Electric motor drives, including availability of all standard voltages, 50 or 60 Hz and explosion proof.

Mounting - Hoist eye for skid mounted units.

Dual axle trailer.

Truck mounted per customer specification.

Tanks - Fiberglass or stainless steel per customers corrosion requirements.

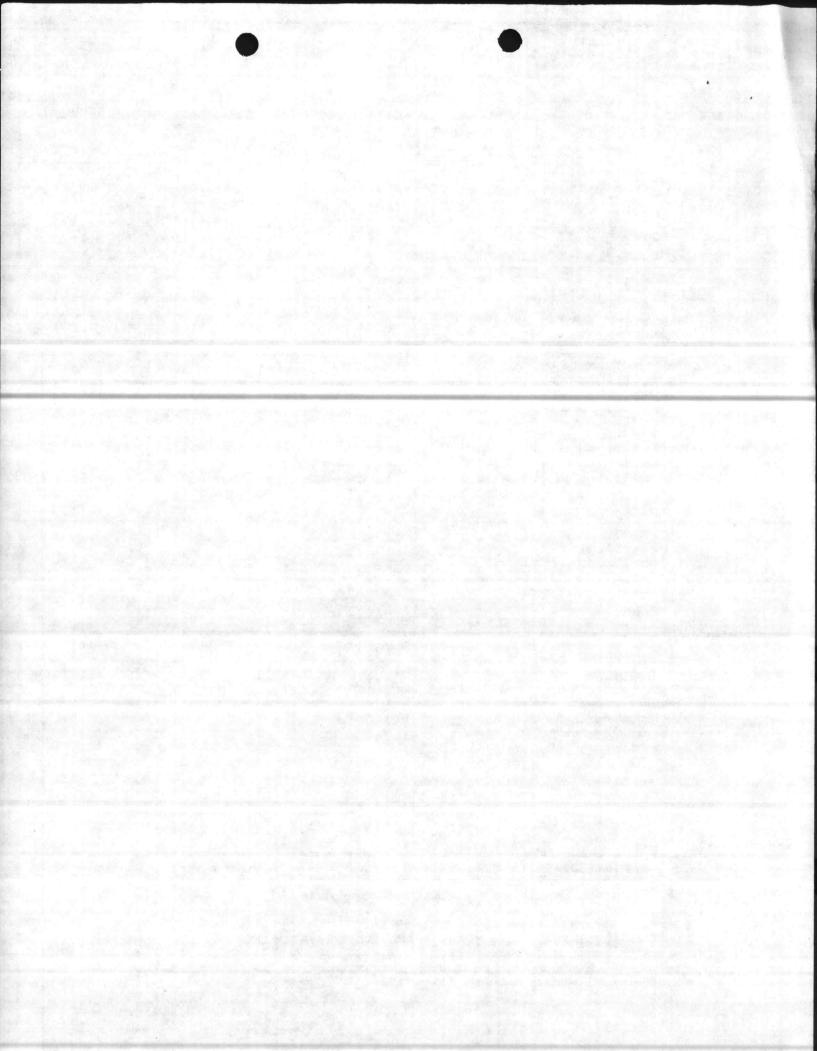
Capacities to customer's specifications, including 8 hour continuous operation capability.

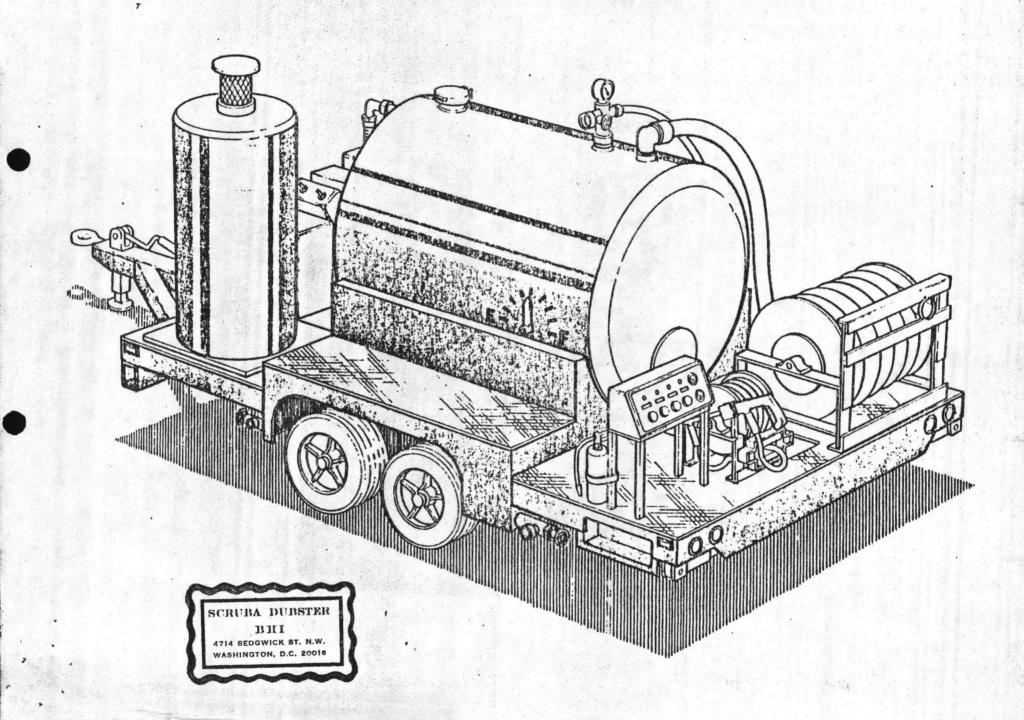
Hose Reel - Suction hose reel - hand crank or electric.

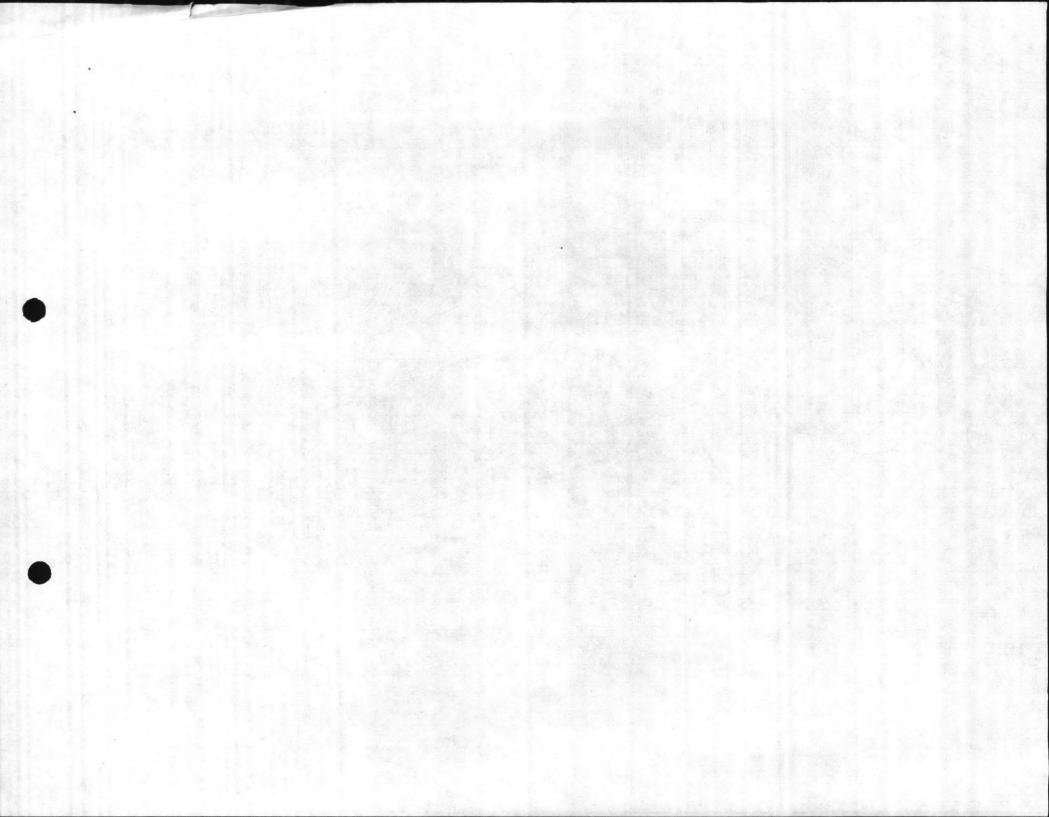
Sand Blast - Liquid sand blasting attachment with sand hopper -- 100#, 300#, and 800# capacities standard.

Pressure - To 5,000 PSI available per customer specification.

Volume - To 12 GPM per customer specifications.







(PROCUREMENT DESCRIPTION FOR ON-SITE CONTAINER CLEANING EQUIPMENT)

The intended primary use of the equipment is to perform the specialized task of cleansing, at their assigned sites, more efficiently, conviently and economically Solid Waste Collection Equipment: dumpster and roll-off containers inside and out, stationary packers and indicated prepared sites. The transporting vehicles and other similar compatible cleansing tasks are also to be accomplished.

It is required that technologies associated with high pressure hot water, vacuum, chemicals and abrasives will be knowledgeably combined and exploited to provide a device able to apply processed cleansing to the Collection Equipment so its operation may continue to the satisfaction of the "customers" dependent on that Collection System.

HOT HIGH PRESSURE WASHER

Discharge: 5 gpm-300 gph

Pressure: 1500 psi adjustable

Hose: 30' high pressure hose on spring rewind reel Pump: Triplex design with lubricated cross head

to withstand extended periods of no water usage Trigger gun: Thermo-plastic dead man type. Wands with grips 24" and 48": extension 36". Three nozzles of O degree, 15 degree

> and 25 degree spray patters, all quick couple.

Discharge temperature: adjustable to 200 degrees.

Burner: 46,000 BTU input

Ignition: Aircraft Magneto, constant

Fuel: Kerosene #1 or #2 diesel

Fuel Tank: 9 hour capacity

Fuel Consumption: Burner 3.0 gph

Chemical Feed: High pressure and low pressure, both systems calibrated.

ENGINE

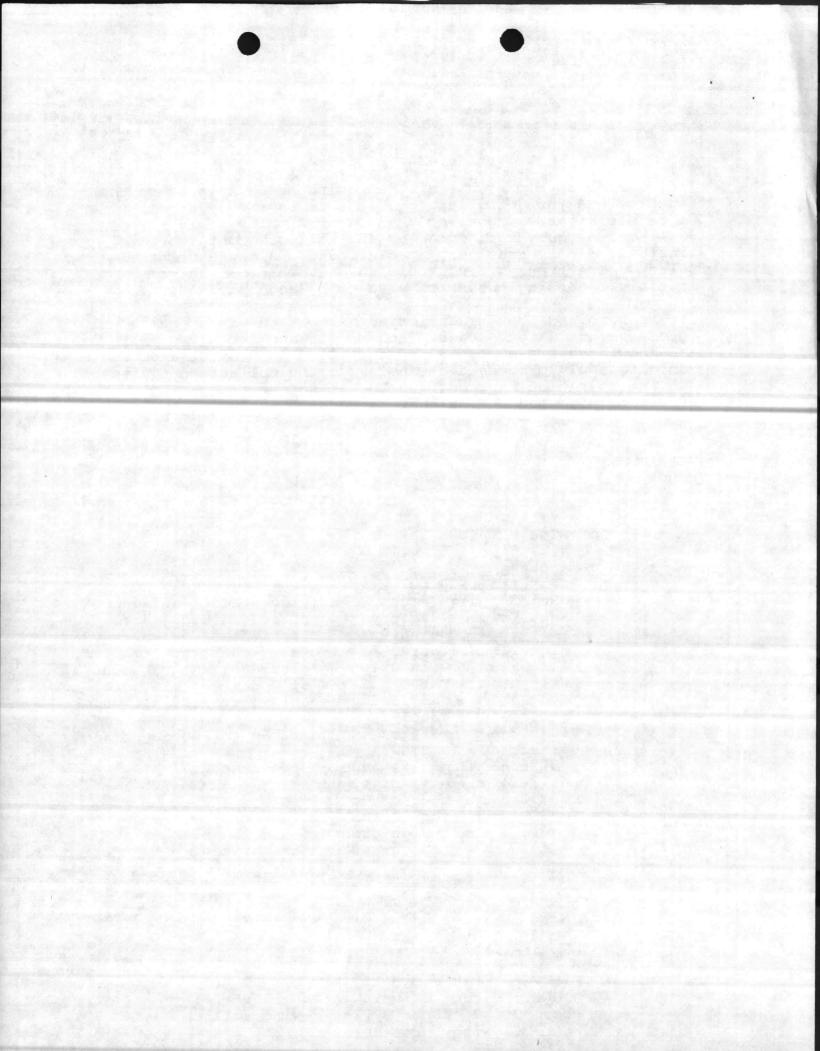
Diesel: Deutz: power minimum equivalent 24 hp gasoline

VACUUM SYSTEM

Air Flow: 270 cfm @ 15" Hg

Blower: direct drive-twin impeller Mose: 30' 3" ID on spring rewind roll

Wand: 5' with three heads



(2) (Procurement Description continued)

WATER TANKS

1000 gallon total capacity divided by baffle for 500 gallons fresh and 500 gallons waste; equipped with cleanout gate and rapid discharge valve. The former to provide easy manual cleanout and the latter to provide a discharge diameter at least 25% greater than the waste inlet diameter.

TRAILER

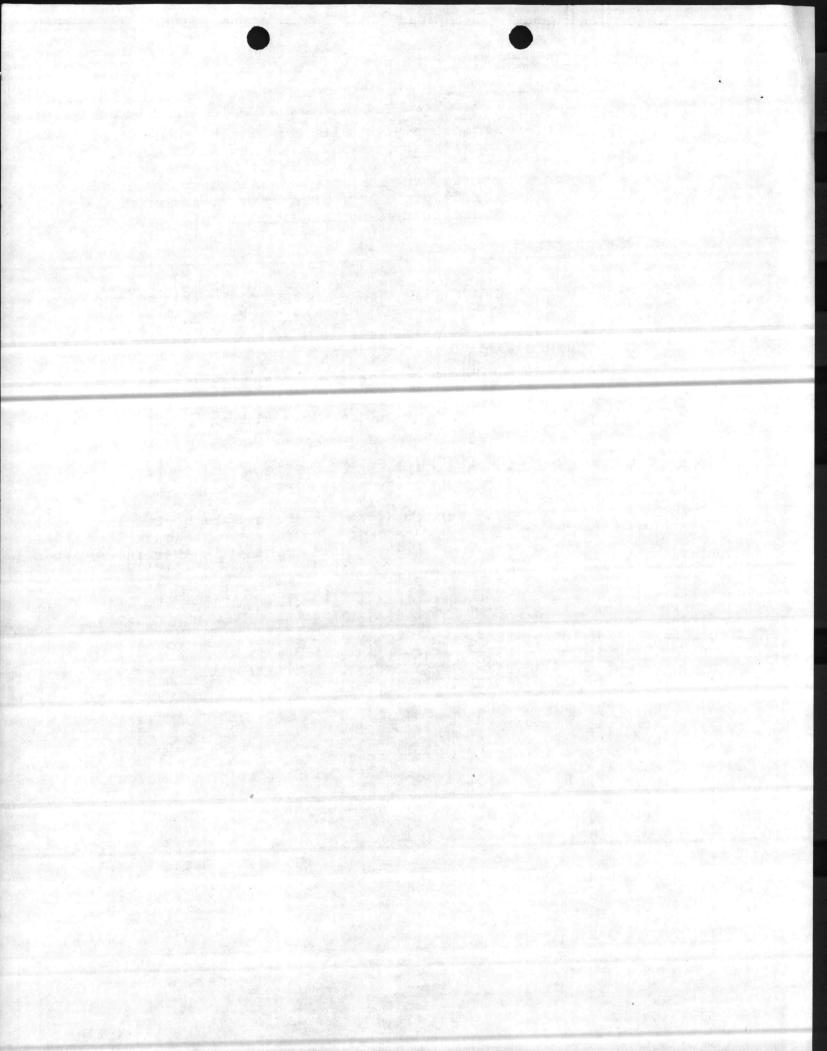
To be mounted on dual axel trailer to withstand rugged service to operate with GAWR of 11000 lbs. minimum: ICC lighting-compatible hitch.

REQUIRED FEATURES

Electric clutches: to permit independent or simultaneous operation of vacuum and water systems. All tanks to have liquid indicators.

Sand blast: liquid sand blasting with 300 lb. capacity sand hopper.

Water concentration device: to enable operator
to assemble occassional
pools of water in dumpster
so vacuum will leave interior
moist-dry.



CONTAINER CLEANSING*

In order to incorporate acceptably into the necessary process of waste handling, the specialized task of cleansing refuse containers, stationary packers and hardened sites, must offer the capabilities listed hereinafter.

A System using high-pressure hot water, detergent-deodorant, grit and vacuum must be brought to the containers for use on-site at the regularly assigned locations of the containers.

Each unit of the System shall be able to process-cleanse containers per the subsequent schedule, in the required increments, at a minimum rate of 15 Eight Cubic Yard Containers in eight contiguous hours.

Water temperature must be adjustable to a maximum of 200 degrees Farenheit, pressure adjustable to a maximum of 1500 psi, flow rate at 5 gpm minimum.

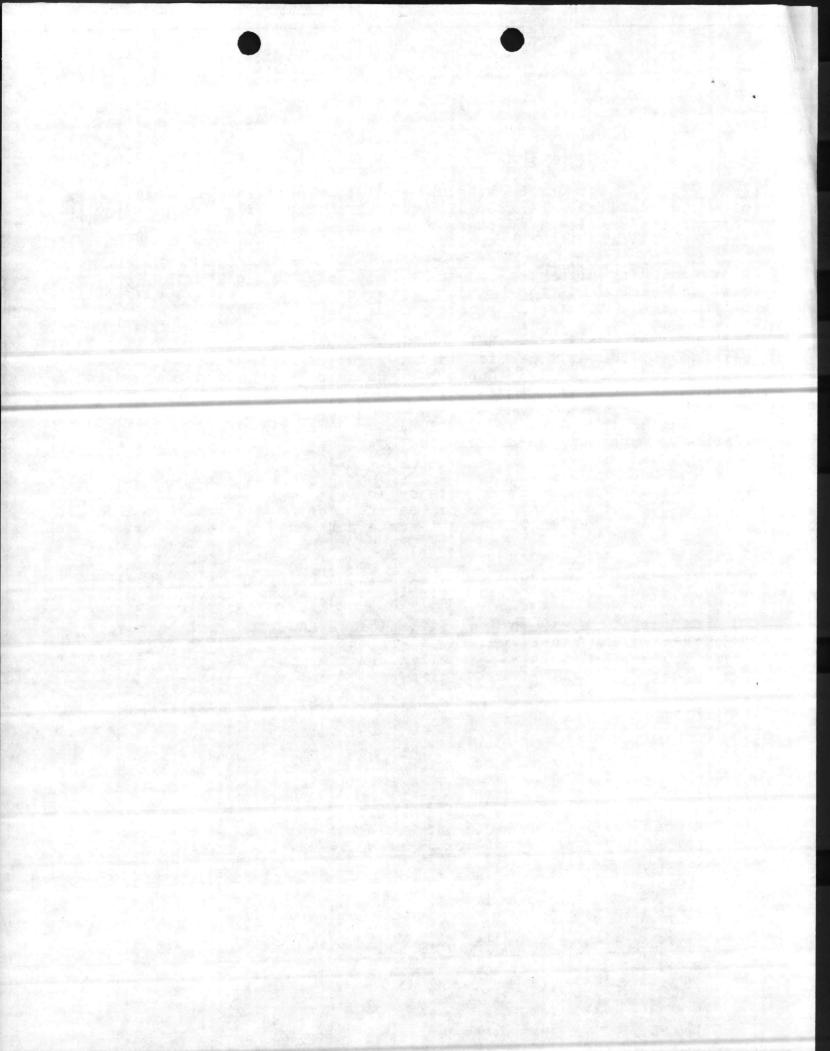
Vacuum at 270 cfm at 15" Hg with capability to vacuum cleanse and leave moist-dry not only the containers, inside and out, but also the hardened sites where certain containers and stationary packers regularly repose.

Detergent-deodorant capability, as well as grit capability, must be a compatible, intergal component of the cleansing system.

For reasons of safety to inhibit explosion and electrical hazards to operators and others who may be in the many sensitive areas where the operation takes place, aircraft magneto is required in the burner chamber.

The System shall neither disrupt the waste handling process nor disturb community life-style.

^{*}For use to obtain adequate contract service by incorporation in the Invitations to Bid for Refuse Service or as an in-house directive to Government employees when work is performed by the Base's own forces.



KIT, CONTAINER MAINTENANCE

Especially developed to ease maintenance requirements, prolong the life, and protect the investment in both new and already in-use Refuse Containers, the following describes a development-by Polymetrics, Inc. of Maitland, Florida, a company long established in problems associated with rail car body maintenance.

Designed particularly for the unique damage control need in Refuse Containers, the Kit provides a System of Polyurethane for the entire Container, inside and out, including especial provision for the vulnerable bottom section, the top lid and end door assemblies. The color incorporated in the System is the customer's choice.

For material costs of about 1/6 that of a new container the use of the Kit anticipates extending the on-line life of a new or in-use FEL, RLP or RO Refuse Container some 3x. Thus, "2 free containers" for each to which application of the Kit is made.

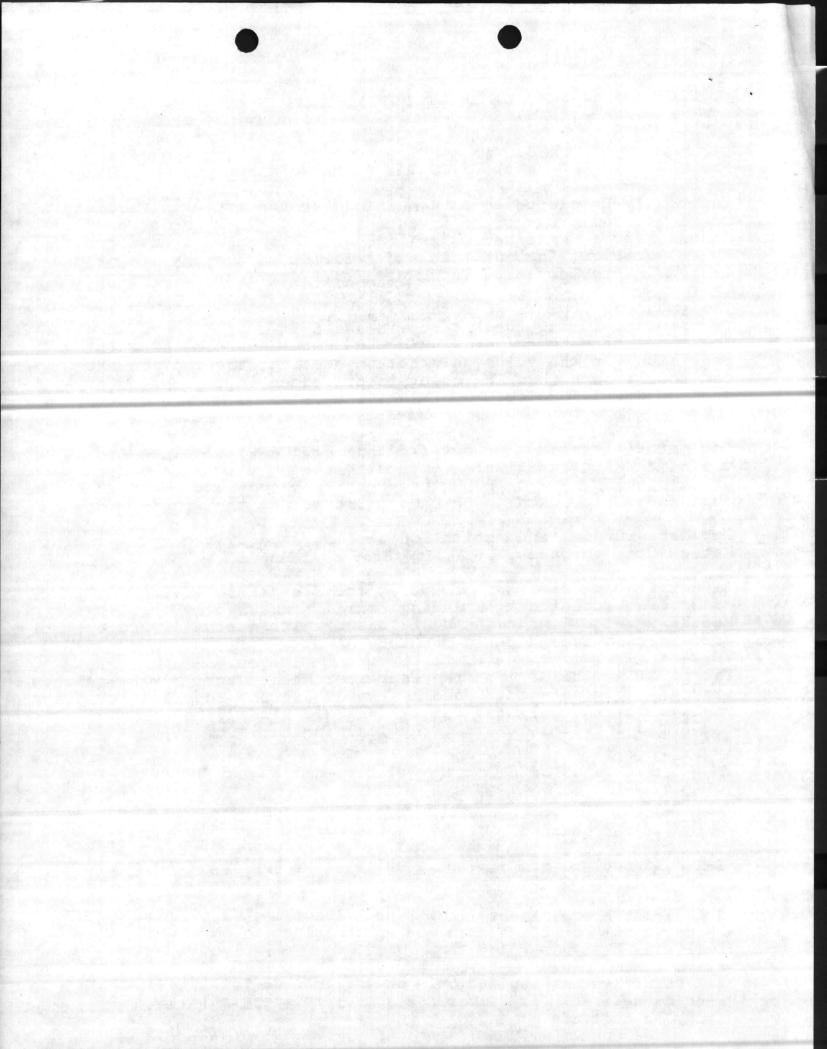
Further, dumping and sanitation are improved by the very smooth, "stick-free"surfaces. Offensive odor is reduced.

Although quite new (May of 1981), the Kit has satisfingly quick commercial acceptance including containers owned by the largest Refuse Service Company, a U. S. Based multi-national, whose containers number high in the thousands.

Technically, the Kit for the Container Maintenance System conters around a Polyisocyanate Monomer known to offer superior corrosion resistance. As polyurethane systems are already well known to the Armed Services, there is no learning curve to climb.

The Kit consists of four interrelated, compatible dependents:

- I-A specific solvent, applied to the "paintable" surface inside and outside.
- 2-A designed primer, silver in color, also applied inside and outside.
- 3-A flexible, resilient liner, shock absorbing, applied inside only on the bottom and up the sides about a foot. This is black in color.
- 4-A color system, applied onl on the outside to achieve any color desired. If silver (# 2 above) is acceptable, step 4 may be omitted.



As to application, our directions are complete, detailed and simple. Any painter can handle the task. Steps 1, 2 and 4 may be brushed, rolled or sprayed. Step 3 should be rolled.

. . . .

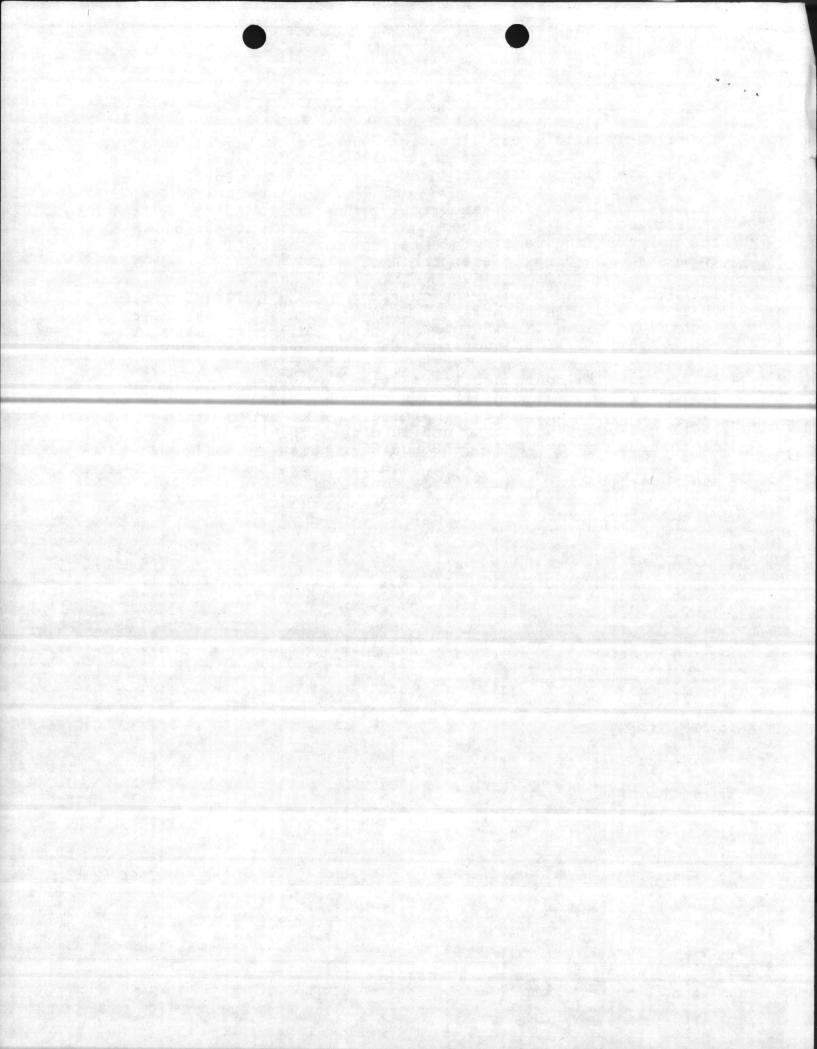
Polymetrics, Inc. the manufacturer who developed the System of Maintenance Kits for refuse containers, is long established in the polyurethane coating of the interior of rail cars where corrosion and dumping are problems.

The Kit is being used by major firms in the Refuse Service business whose inventories of many thousands of containers are located in the U.S., Europe and the Middle East, also in South America. The endorsement of such users is unimpeachable.

An increase in container life 3 times provedes significant capital retention: less than a hundred dollars in material "buys" 2 additional "new" containers. With new containers costing \$700.00 delivered and in place, the savings on 100 containers approximates \$140,000.00--a figure of noteable magnitude. Improved on-line time and facilitated dumping from the smooth, slick liner are concomittants.

We anticipate further contact.

J. BANKS HUDSON, INC.
"B H I"



(For inclusion in Service Contractors agreements when they provide new, used or rehab'd Refuse Containers for the Base)

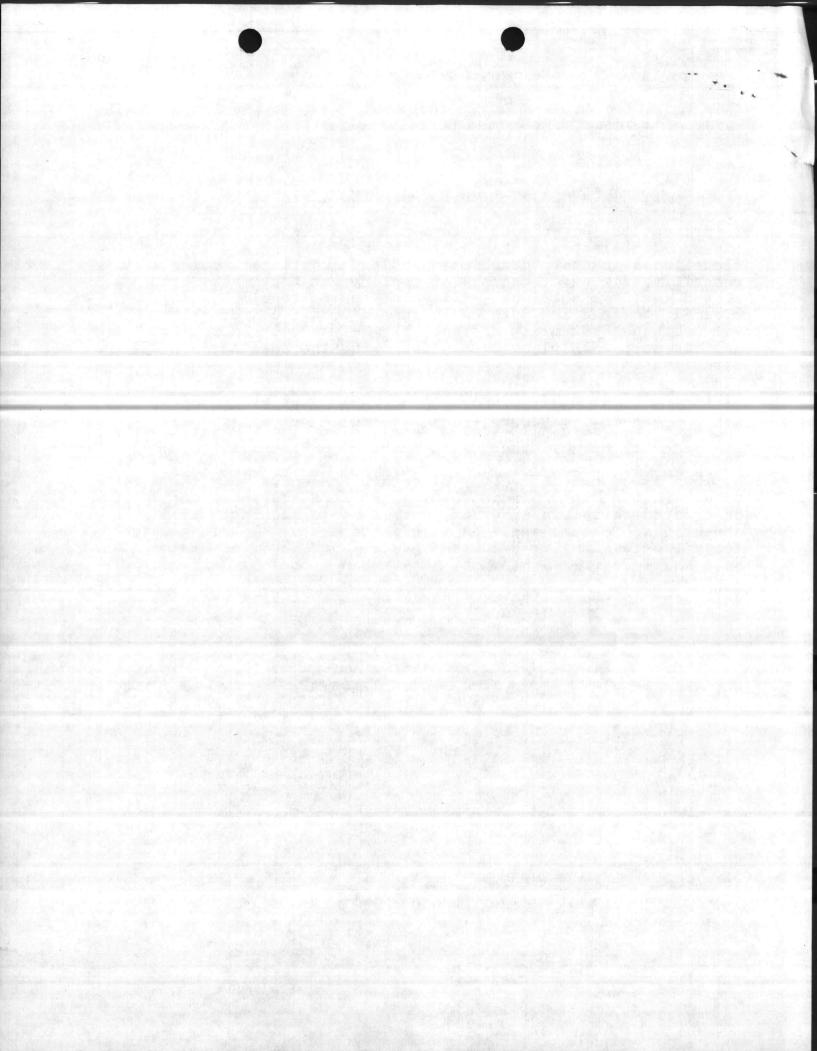
CONTAINER TREATMENT, PAINTING AND PRESERVATION

To protect the Government's investment in its containers, to improve container appearance, to enhance dumping and thus cleanliness and to reduce odor problems, containers going thru rehabilitation and those new or replacement containers brought aboard the Base shall be, in lieu of conventional painting, cleaned, treated and painted in accord with a commercial Polyurethane System Kit designed for refuse containers (Polymetrics part # BH101 or equal) following the supplier's directions.

Surfaces to be painted shall be cleaned and dried to insure they are free from contaminants, such as oil, grease, welding slag and spatter, loose mill scale, water, dirt, loose paint, corrosion product, or any other contaminanting substances.

As soon as practicable after cleaning, and before any corrosion or other contamination can result, the surfaces shall be prepared or treated to insure adhesion, according to manufacturer's directions. Coating shall be with manufacturer's current materials according to supplier's current processes. The finished paint coat shall be free from runs, sags, orange peel or other defects

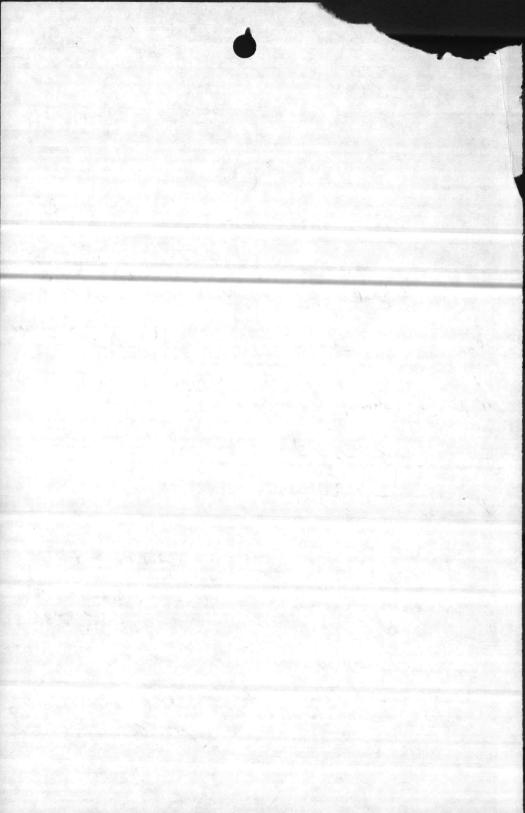
The color of the finish coat shall be as specified by the Base.



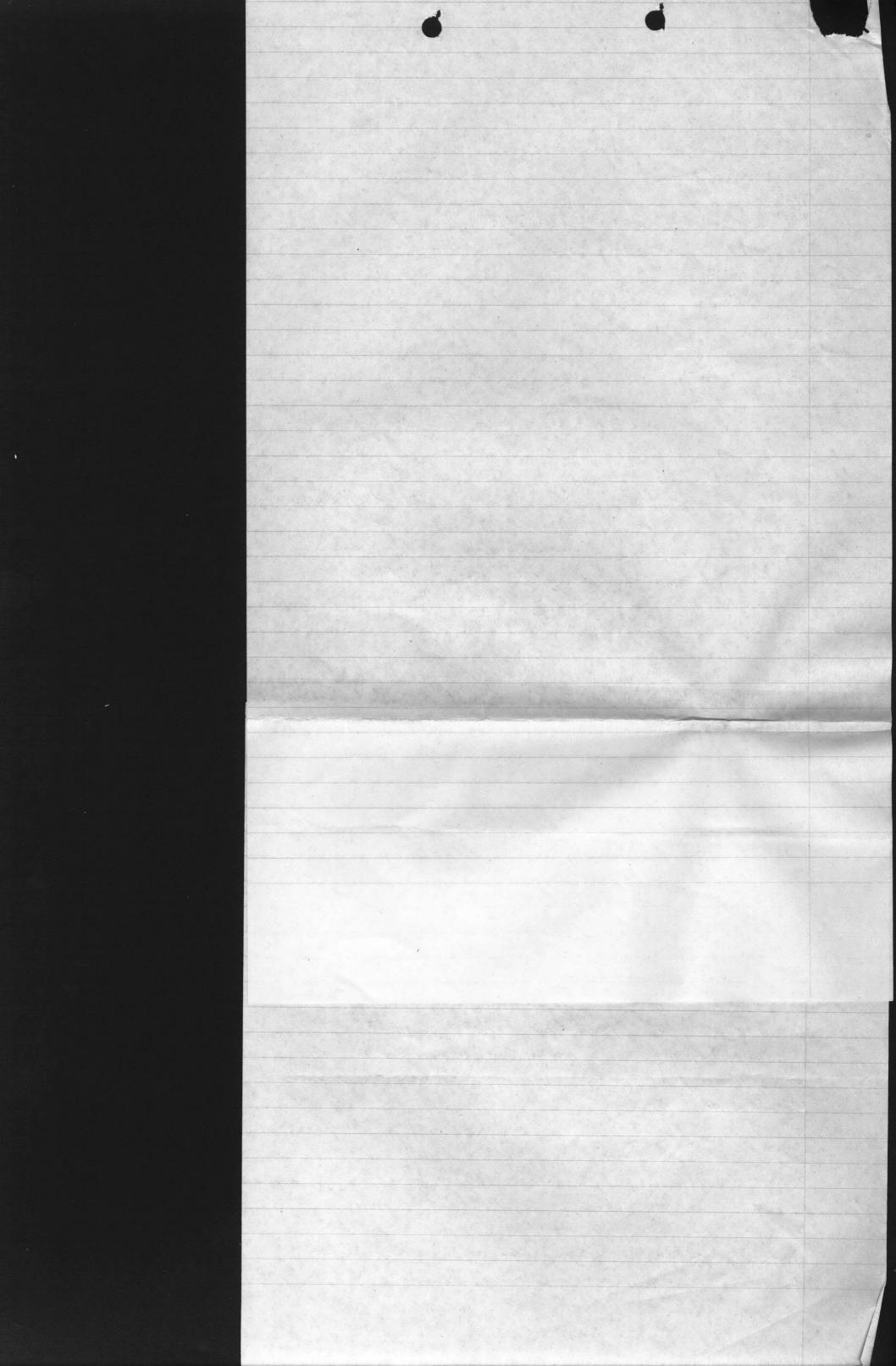
Danny, & See Mr Elston's Note JUW 009

92 B

RESOURCES AND EN RONMENTAL AFFAIRS BRANCH BASE MAINTENANCE DIVISION MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA 28542 8-12-82 Date From: Director
To: B M O Subj: Asbiston at DPD Lot attached provides additional enfor Defense Proporty Desposal Kontrator problem which was discussed dwing Staff meeting this AM. Have falked w/ DADO & PWO concerning askesta pipe. DADO states they will get with favo same. Dwo says they will have contractor to move upon popo identify which contractor. Delle



subject: Disposal of asbestis Insulated Pipe Ref (a) Forecan between Mr. R. J. andrews, Base Sufety manger and Mr. Julin worley B. Main Dof 1/Aly 11 Aug 8~ per Tex Ritter, Bake defels) and Mr. Oamy Stage, Brain Dog 11 amy 87 1. This is to advise that a large quantity of the subject gipl issulated with friable osteslas is currently stond in a file at dot 203 by the Orfense Property Disposed office (DPDO), Minny ref (a), My andrews regrested NREAB assistance with determining a safe inverementally sound wither of disposal of the gagl. During reference (6), it was leaved that the give had been dunged 2 at the DPDO lot by a contractor. 2 During ref (a). Mr andiews advised that OPDO wanted to dispesse of the material at the Rose Sankfell. Which of the material Ceseses 3-416 Drawn line Coaled in asbestas with as orter congalish pipe 1 Springs 8 12" to deameter. Current Bolle policy does not permit disposal of this size pipe of the Cardfill. However, No environmented Constraint exists which would prevent the BMO from making an exception. By passor of the subject material well-be present Condition of the subject pipes well require pardling under severe safely Constraints. It should be noted that the contractor man be liable for cleaning up and proper disposor of the material. accordingly, it is recommended that the DPDO be requested to formally advise the ACIS Saculities and the ROYCC of the subject problem and to request appropriate assistance. The natural struld be hardled following recommendations and guidence of Base Lafets Mig. & Industrial Aggrest (NRMC).





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

File. Hz waste GENCY 1482

AUG 9 1982

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

To Whom It May Concern:

Thank you for your cooperation in our recent telephone effort to create an accurate list of treatment, storage, and disposal facilities which handled hazardous waste in 1981. Facilities randomly selected from this list will receive a questionnaire in the next week or two. The Office of Solid Waste needs the information from these efforts to better plan, manage, and evaluate the hazardous waste regulatory program under RCRA.

The questionnaire to be sent is extensive because it will enable the Agency to carry out regulatory impact analysis. This analysis combines cost/benefit analysis with human health and environmental risk assessment so that our approach for regulating hazardous waste management practices can be made more effective and more efficient.

If your facility is selected, you will receive a questionnaire package in the next few weeks. Your continued cooperation will assist the Agency in its efforts to develop and refine effective and reasonable regulations governing the management of hazardous wastes.

Sincerely,

George A. Garland Chief, Analysis Branch

Office of Solid Waste (WH-562)

United States Environmental Protection Agency Official Business Penalty for Private Use \$300 First-Class Mail Postage and Fees Paid EPA Permit No. G-35

Washington DC 20460

NC6170022580
SHARPE DANNY ECOLOGIST
MARINE CORPS BASE CAMP LEJEUNE
NC HWY 24 & US HWY 17
CAMP LEJEUNE

NC 28542

Director, Natural Resources and Environmental Affairs Branch

Director, Maintenance & Repear Branch

Used Transformers Awaiting Disposal

Encl: (1) LANTDIV 1tr 114:JGW:mbe 6280 of 15 Jul 1982

1. The enclosure furnishes data required to turn subject items into the local Defense Property Disposal Office. Samples marked "921 - 923" do not apply to transformers aboard Camp Lejeune. These were check samples inserted by Atlantic Division, Naval Facilities Engineering Command, to check quality of contract laboratory.

J. I. WOOTEN

Storman Co

Manta Carte Content of the Content o

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and the of the serie admittage and the total the





ATLANTIC DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

NORFOLK, VIRGINIA 23511

TELEPHONE NO.
444-9566
AUTOVON 690-9566
IN REPLY REFER TO:

114:JGW:mbe 6280

1 5 JUL 1982

From: Commander, Atlantic Division, Naval Facilities Engineering Command

To: Commanding General, Marine Corps Base, Camp Lejeune

Subj: Transformer Oil Analyses; results of

Encl: (1) Certificate of Analysis, Jennings Laboratories, Inc.

1. In response to submittal by Marine Corps Base (MCB), Camp Lejeune, of water and transformer oil samples for PCB analysis, enclosure (1) is forwarded as a record of oil analysis results. Only sample numbers 911-918 apply to MCB CAMP LEJEUNE.

- 2. The results of analysis of water samples will be forwarded upon receipt from the contractor.
- 3. LANTNAVFACENGCOM point of contact is Mr. Jerry Wallmeyer, telephone (804) 444-5566 or A/V 690-9566.

J. R. BAILEY, P.E. By direction

Copy to:
CG MCB CAMP LE JEUNE
(NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS)
(ATTN: Mr. D. Sharpe)

JEMMINGS LABORATORIES, INC.

ANAL ICAL AND CONSULTING CHEMISTS

1113 CYPRESS AVENUE • P. O. BOX 851 • VIRGINIA BEACH, VA. 23451 • PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

ASBESTOS ANALYSIS - NIOSH 582

Official Referee Chemists for: AMERICAN OIL CHEMISTS SOCIETY

NATIONAL SOYBEAN
PROCESSORS ASSOCIATION

Laboratory Approved by VA. STATE WATER CONTROL BOARD for Analysis of Effluents for NPDES PERMITS

CERTIFIED OFFICIAL U.S.D.A. LABORATORY FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

To: Mr. Dave Goodwin
Building N-23 Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511

DATE: May 20, 1982

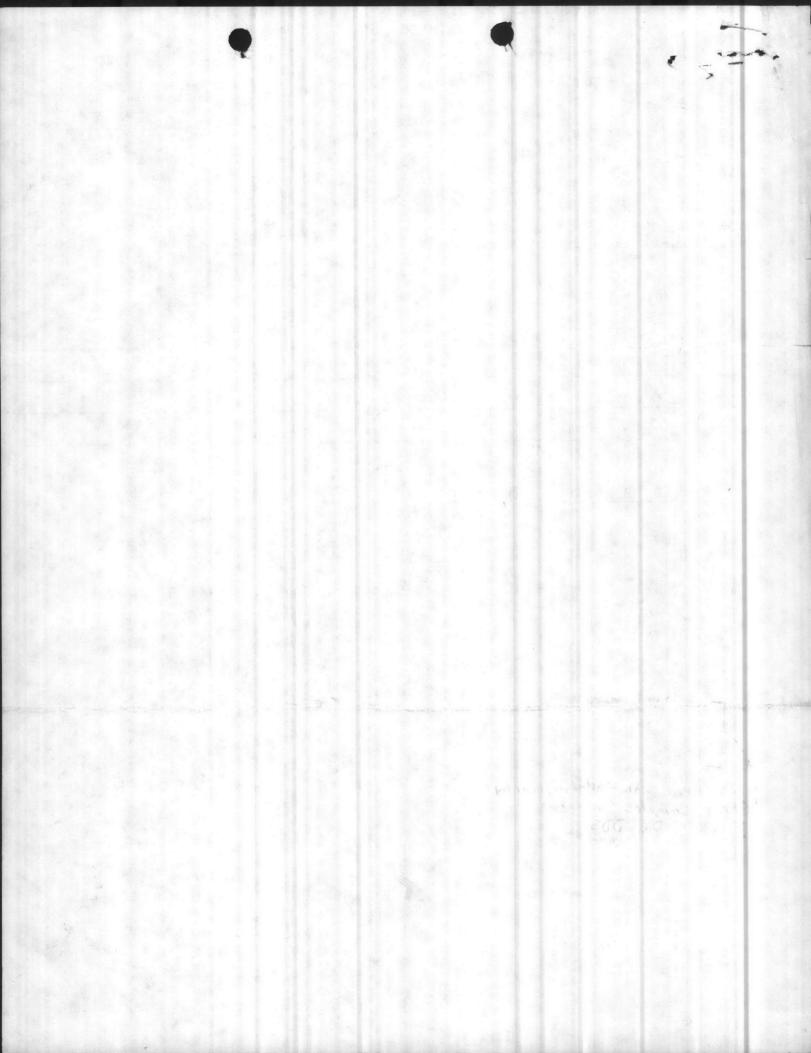
Samples delivered	Samples delivered to laboratory 5/06/82			
CIAL SAMPLE BY:				
SAMPLE AS MARKED	LABORATORY ANALYSIS NUMBER	<u>PCB</u>		
#911	#1405	None Detected (<0.01 ppm)		
#912	#1406	None Detected (<0.01 ppm)		
#913	#1407	None Detected (<0.01 ppm)		
#914	#1408	None Detected (<0.01 ppm)		
#915	#1409	None Detected (<0.01 ppm)		
#916	#1410	None Detected (<0.01 ppm)		
#917	#1411	None Detected (<0.01 ppm)		
#918	#1412	None Detected (<0.01 ppm)		
T#921	#1413	250.86 ppm		
#922	#1414	762.88 ppm		
#923	#1415	4.13 ppm		

Respectfully submitted,
JENNINGS LABORATORIES, INC.

Laboratory Analysis No. listed above

CHEMIST #GO.00 ca

OFFICIAL METHODS OF A.O.A.C., A.O.C.S., A.S.T.M., A.P.H.A., E.P.A. AND N.S.P.A. USED IN ALL ANALYSIS UNLESS OTHERWISE STATED



NATURAL RESOURCES AND ENVIOUMENTAL AFFAIRS BRANCH
Base Mainter ce Division Bm o Marine Corps Base Camp Lejeune, North Carolina 28542 AB mo MIL Date 7-21-82 From: Director, NREAB
To: BMO Subj: Hazardous Waste duspretion attached which was received by Dany Sharps this date is submitted for your info. I recommend à copy be sent to AC/s Fac for info.
Julian Send cogn for info. beth.





Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

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

July 19, 1982

Commanding Officer
ATTN: Lt. Col. D. W. Nelson,
S4 Officer
Marine Corps Air Station (H)
New River
US Hwy 17 South
Jacksonville, NC 28546

Dear Sir:

On June 22, 1982 Messrs. Jerry Rhodes and Ray Church of the Solid and Hazardous Waste Management Branch conducted a RCRA inspection of your facility. The following violations were noted:

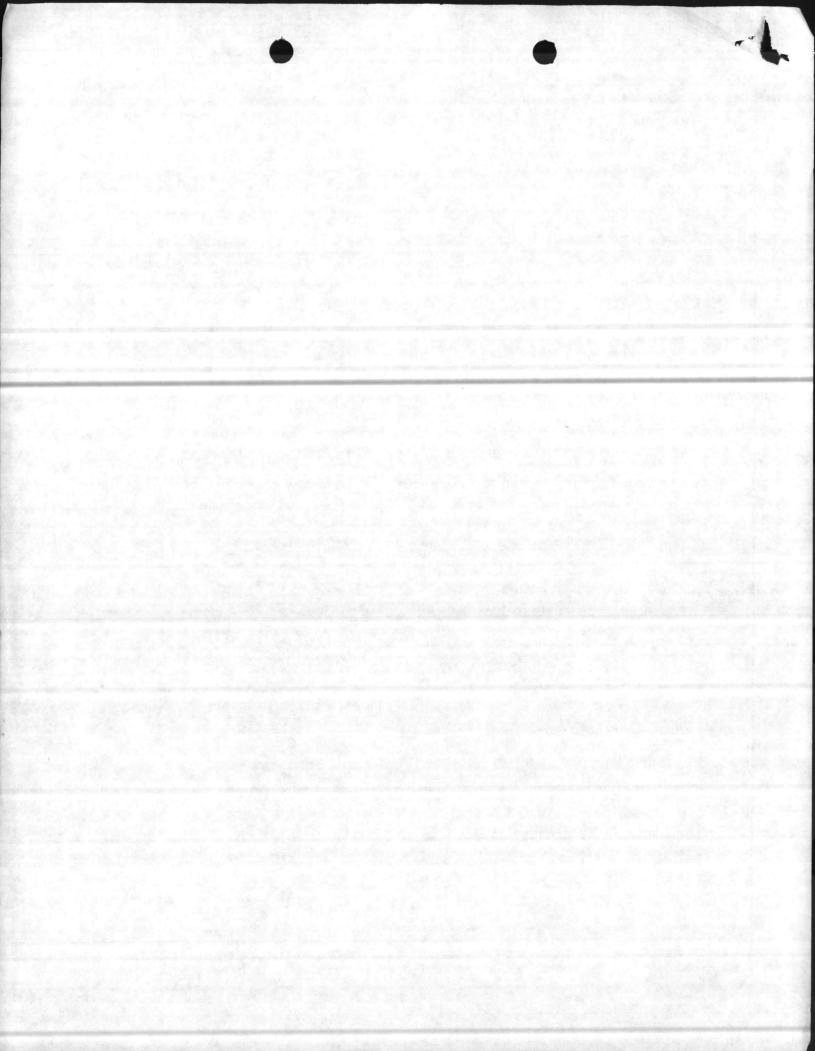
- 1. Contingency Plan: Emergency coordinator is named by a position (265.52(d) & 265.55).
- 2. Manifest: Errors on initial manifests (262.21).
- 3. Labeling: All containers were not labeled (265.31).
- 4. Accumulation Time: All containers were not dated and containers were being stored for more than 90 days (262.34).
- 5. Management of Containers: All were not closed (265.173).

The following compliance schedule has been established:

- 1. This practice can be allowed if position is always filled with qualified, knowledgeable officials. These officials must qualify under 40 CFR Section 265.55 and be familiar with all of Section 265.56.
- 2. New manifests are to be correct.
- 3. To be corrected immediately.
- 4. Containers are to be dated immediately. Containers stored more than 90 days must be removed from MCAS New River immediately or complete all requirements for a container storage facility.
- 5. Containers are to be closed.

Please advise this office of corrective actions.





Lt. Col. D. W. Nelson Page 2 July 19, 1982

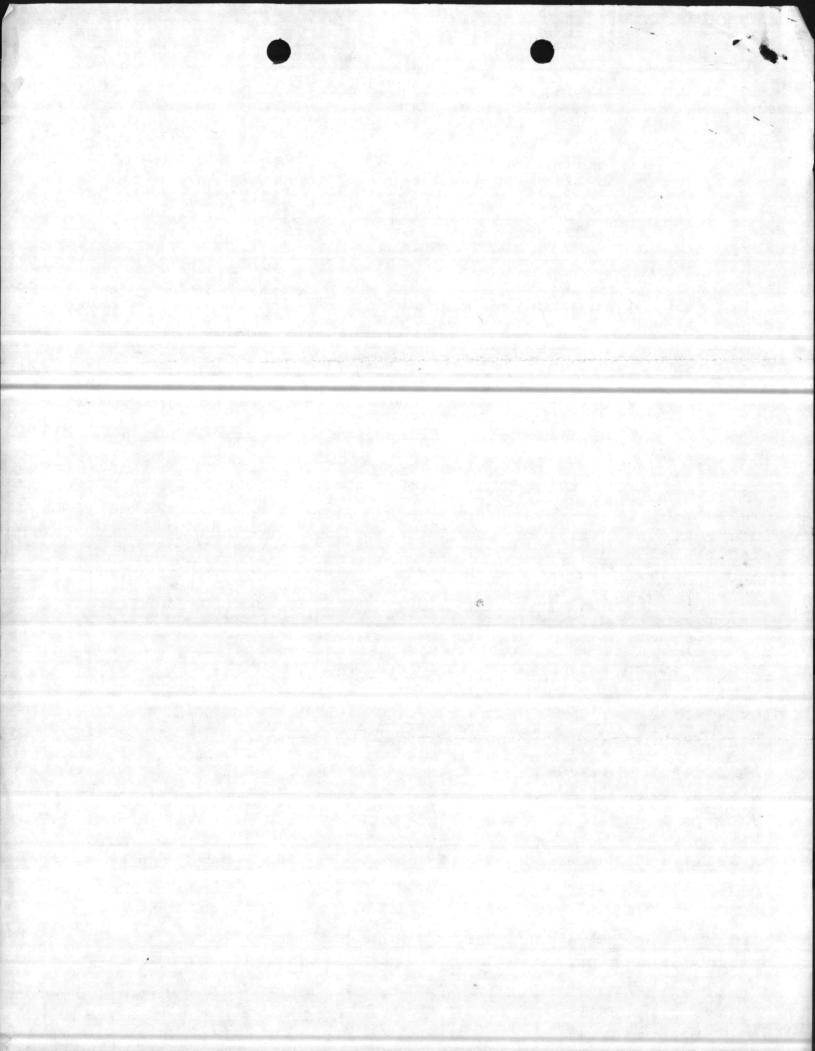
If you have any questions concerning this matter, please contact Mr. William Paige, Environmental Chemist at (919) 733-2178.

Sincerely,

9. W. Strickland, Head Solid & Hazardous Waste Management Branch Environmental Health Section

OWS:nlc

cc: Mr. Danny Sharp Mr. Ray Church





DEPARTMENT OF THE NAVY

NAVAL FACILITIES ENGINEERING COMMAND NORFOLK, VIRGINIA 23511

TELEPHONE NO.
444-9566
AUTOVON 690-9566
IN REPLY REFER TO:

114:JGW:mbe 6280

1 5 JUL 1982.

From: Commander, Atlantic Division, Naval Facilities Engineering Command

To: Commanding General, Marine Corps Base, Camp Lejeune

Subj: Transformer Oil Analyses; results of

Encl: (1) Certificate of Analysis, Jennings Laboratories, Inc.

1. In response to submittal by Marine Corps Base (MCB), Camp Lejeune, of water and transformer oil samples for PCB analysis, enclosure (1) is forwarded as a record of oil analysis results. Only sample numbers 911-918 apply to MCB CAMP LEJEUNE.

- 2. The results of analysis of water samples will be forwarded upon receipt from the contractor.
- 3. LANTNAVFACENGCOM point of contact is Mr. Jerry Wallmeyer, telephone (804) 444-5566 or A/V 690-9566.

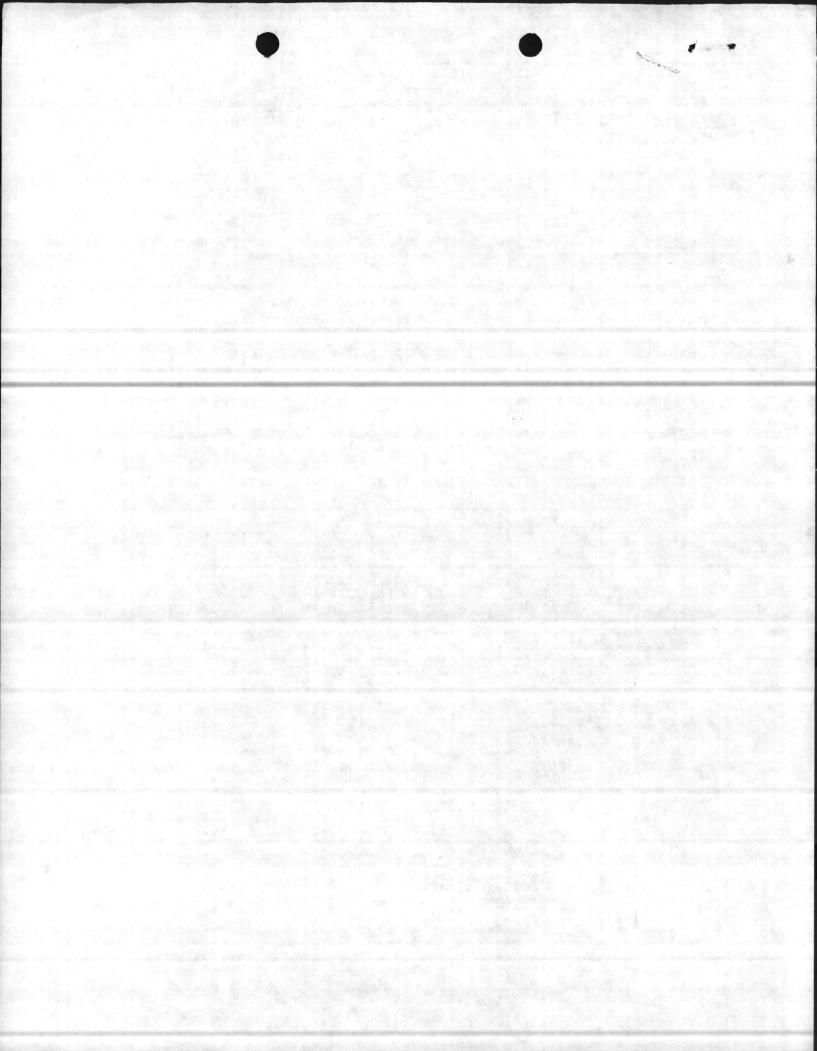
For J. R. BAHEY, P.E. By direction

Copy to:

CG MCB CAMP LE JEUNE

(NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS)

(ATTN: Mr. D. Sharpe)



SENNINGS LABORATORIES, INC.

ANALYTICAL AND CONSULTING CHEMISTS

1118 CYPRESS AVENUE • P. O. BOX 851 • VIRGINIA BEACH, VA. 23451 • PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

ASBESTOS ANALYSIS - NIOSH 582

Official Referee Chemists for:
AMERICAN OIL CHEMISTS SOCIETY

NATIONAL SOYBEAN PROCESSORS ASSOCIATION

Laboratory Approved by VA. STATE WATER CONTROL BOARD for Analysis of Effluents for NPDES PERMITS

CERTIFIED OFFICIAL U.S.D.A. LABORATORY FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

Mr. Dave Goodwin
Building N-23 Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511

DATE: May 20, 1982

SAMPLE OF TRANSFORMER OIL SAMPLE (11)

MARKED

Samples delivered to laboratory 5/06/82

OFFICIAL SAMPLE BY:

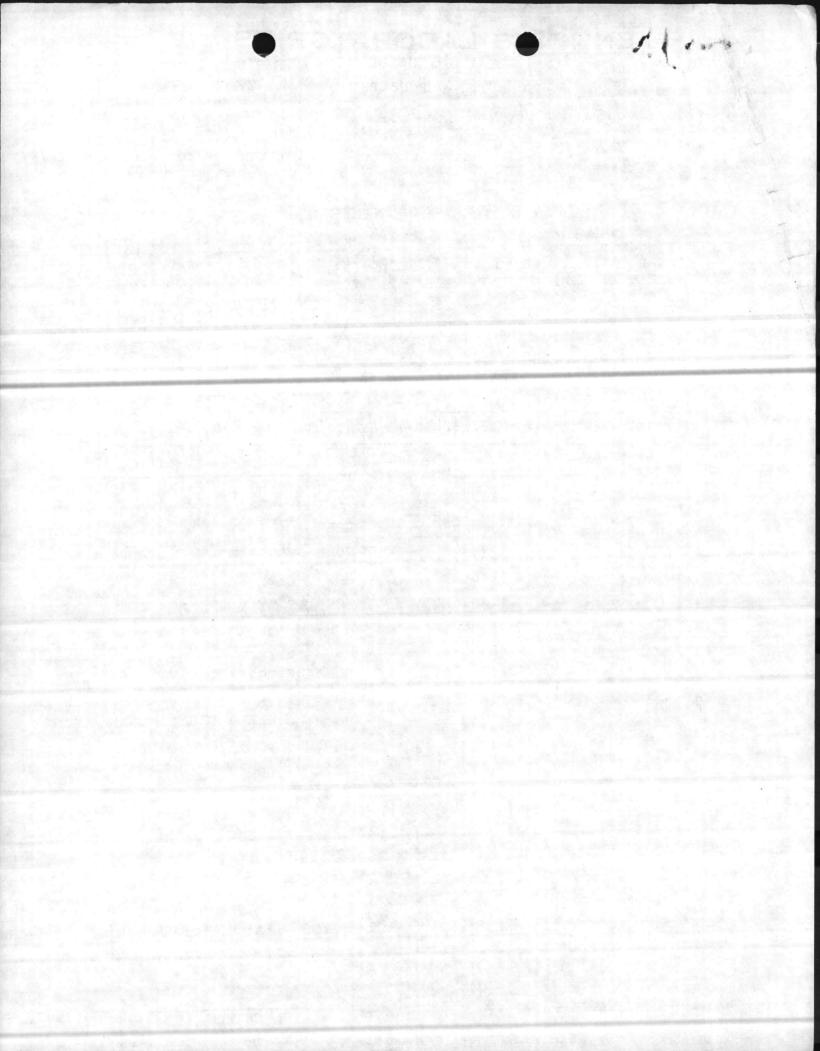
SAMPLE AS MARKED	LABORATORY ANALYSIS NUMBER	PCB
#911	#1405	None Detected (<0.01 ppm)
#912	#1406	None Detected (<0.01 ppm)
#913	#1407	None Detected (<0.01 ppm)
#914 CLNC	#1408	None Detected (<0.01 ppm)
#915	#1409	None Detected (<0.01 ppm)
#916	#1410	None Detected (<0.01 ppm)
#917	#1411	None Detected (<0.01 ppm)
#918	#1412	None Detected (<0.01 ppm)
#921	#1413	250.86 ppm
#922	#1414	762.88 ppm
#923	#1415	4.13 ppm

Respectfully submitted,
JENNINGS LABORATORIES, INC.

Laboratory
Analysis No. listed above

CHEMIST #90.00 ca

OFFICIAL METHODS OF A.O.A.C., A.O.C.S., A.S.T.M., A.P.H.A., E.P.A. AND N.S.P.A. USED IN ALL ANALYSIS UNLESS OTHERWISE STATE



Twylah

Make us a Copy of worthy

and sundy to M + R

Julian

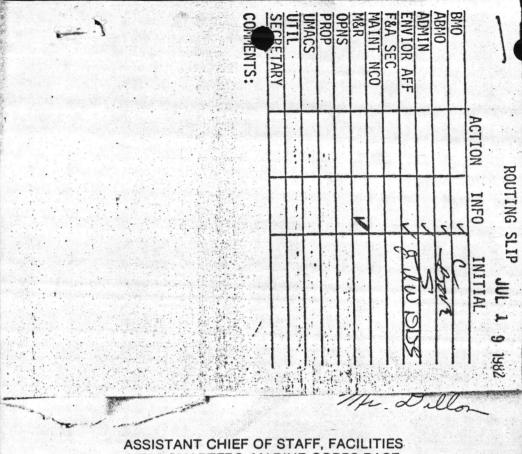
	Julia		
ROUTING	SLIP HUL &	3	1982

N. A.	ACTION	INFO	INITIAL
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ABMO		7	BUE
ADMIN		7	5
ENVIOR AFF			DUW
F&A SEC			
MAINT NCO			
M&R	· V		
OPNS			
PROP			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

MREA/MER:
Take action to disson
of subject transforming
subject transforming





HEADQUARTERS, MARINE CORPS BASE

DATE 15 July 82

TO:

BASE MAINT O

PUBLIC WORKS O

COMM-ELECT O

ATTN:

MOTOR TRANSPORT O

DIR, FAMILY HOUSING

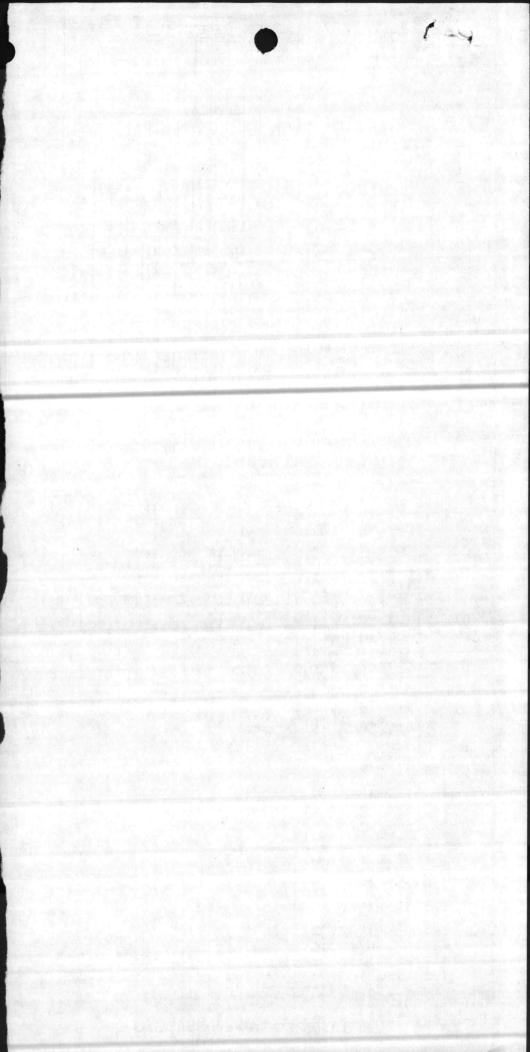
DIR, UNACCOMPANIED PERS HSG

BASE FIRE CHIEF

1. Attached is forwarded for info/action.

- 2. Please initial, or comment, and return all papers to this office.
- 3. Your file copy

K. P. MILLICE, Jr.





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

July 13, 1982

Commanding General
ATTN: Assistance Chief of
Staff, Facilities
Marine Corps Base
Camp Lejeune, NC 28542

Dear Sir:

On June 21, 1982 Mr. Jerry Rhodes of the Solid and Hazardous Waste Management Branch conducted a RCRA re-inspection of your facility. You were found to be in compliance with the standards.

This office wishes to thank you for your cooperation and please do not hesitate to contact us if we may be of future assistance.

Sincerely;

0. W. Strickland, Head

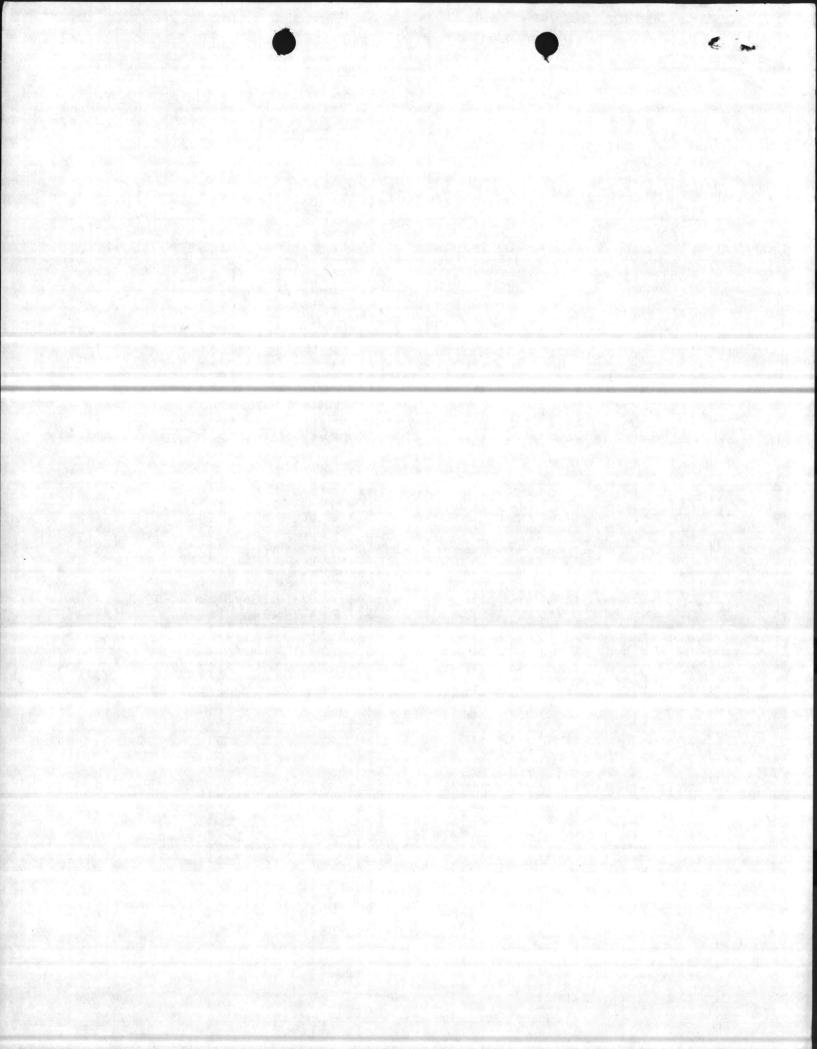
Solid & Hazardous Waste Management Branch

Environmental Health Section

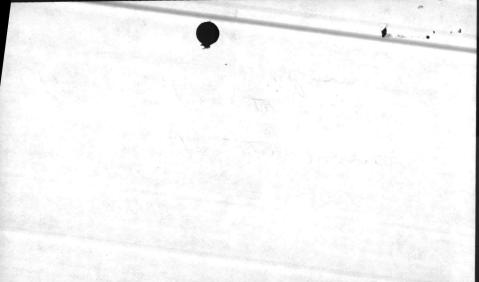
OWS:nlc

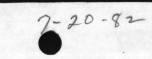
cc: Mr. Ray Church

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Dany, See attached - Should soneone attend. Ald Juliano







Ronald H. Levine, M.D., M.P.H.
STATE HEALTH DIRECTOR

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

July 7, 1982

TO: Owners and Operators
Hazardous Waste Treatment, Storage
or Disposal Facilities in North Carolina

On November 19, 1980, the State of North Carolina adopted its Hazardous Waste Management Rules. These rules adopt by reference the Federal regulations dealing with financial requirements for all hazardous waste treatment, storage, and disposal facilities. More specifically, 10 NCAC 10F .0032(g) adopts the final financial requirements for facilities set forth in 40 CFR, Part 264, Subpart H, and 10 NCAC 10F .0033(h) adopts the interim financial requirements set forth in 40 CFR, Part 265, Subpart H. North Carolina's rules require that hazardous waste facilities have financial assurance for closure (and post-closure if a disposal facility). Four mechanisms are available to facility owners for accomplishing this task. These are: (1) Trust Fund; (2) Surety Bond guaranteeing payment into a trust fund; and (3) Letter of Credit; and (4) other methods that provided an equivalent degree of protection concerning human health and the environment as mechanisms 1, 2, and 3.

The Federal regulations adopted by North Carolina also require that all hazardous waste treatment, storage and disposal facilities operating in the State be covered by liability insurance for sudden (accidental) occurrences, and that all hazardous waste surface impoundments, landfills, or land treatment facilities have liability insurance covering non-sudden occurrences.

The Federal financial responsibility regulations, Subpart H, have been revised since they were originally adopted in North Carolina. These revisions, published in the Federal Registers on April 7 and April 16, 1982, accomplished two things. They expanded the financial assurance and liability insurance mechanisms available to facility owners and set new Federal compliance dates.

It is anticipated that the above revisions in the Federal rules, except for compliance dates, will be adopted in North Carolina in August. Until that time, the existing North Carolina Rules for Hazardous Waste Management continue in effect. These existing rules have been strictly enforced concerning required cost estimates for closure and post-closure. When the Federal revisions have been adopted in North Carolina, the Solid and Hazardous Waste Management Branch intends to enforce compliance with the Subpart H, Financial Requirement Rules, beginning on the following dates:

	Permitted Status & New Facilities	Interim Status & Existing Facilities	
Financial assurance for closure and post-closure care plans	At least 60 days before the first receipt of hazardous waste	October 1, 1982	
Liability coverage for sudden accidental occurrences	At least 60 days before the first receipt of hazardous waste	October 1, 1982	
Liability coverage for non-sudden accidental occurrences	At least 60 days before the first receipt of hazardous waste	Annual Sales or Revenues Date over \$10 mil. Jan. 16, 1983 \$5-\$10 mil. Jan. 16, 1984 others Jan. 16, 1985	

The new additional Federal mechanisms for achieving financial assurance as published in the Federal Register on April 7 and April 16, 1982 are likely to be adopted as written in North Carolina, and should therefore provide accurate guidance in your preparations for providing financial assurance by the above dates. Please contact this office at (919) 733-2178 if you have any questions regarding your responsibilities in complying with these requirements.

Sincerely,

0. W. Strickland, Head

Solid & Hazardous Wa Management Branch

Environmental Health Se ion

OWS:nlc

Attachment

R.C.R.A. One Day Conference

FINANCIAL ASSURANCE FOR CLOSURE AND POST-CLOSURE CARE AND LIABILITY INSURANCE REQUIREMENTS

August 25, 1982, McKimmon Center, Raleigh, North Carolina August 26, 1982, Mulls Conference Center, Hickory, North Carolina

Registration: 8:00 A.M. - 9:00 A.M.

Program: 9:00 A.M. - 4:30 P.M.

Objectives: Acquaint representatives of North Carolina industries and institutions who must meet the new RCRA Financial Assurance requirements with the requirements and with the available means of meeting them. Provide a setting in which the representatives meet with EPA and North Carolina Hazardous Waste staff and with bankers and insurance company officials to discuss costs and instruments for meeting the RCRA requirements.

For: Representatives of industries and institutions who are treators, storers, or disposers of hazardous waste, as defined under RCRA, and who must meet the North Carolina October 1 deadline requirement for financial assurance for closure and post-closure care. And for representatives of financial institutions and insurance companies who will be providing the trust funds, surety bonds and insurance policies called for in the RCRA provisions.

Program: The program will include: a presentation by Michael J. Hartnett, the EPA Region 4 Residual Management Branch Specialist on implementation of the financial assurance regulations; presentations by the legal and technical staff of the Solid and Hazardous Waste Management Branch of the State of North Carolina on the North Carolina regulations, the implementation schedule and enforcement plan; and presentations by representatives of the North Carolina insurance and financial community covering their means of helping TSDs meet the RCRA requirements. Time has been scheduled for questions and discussions.

Handout: Each participant will receive a copy of the May 1982 EPA publication: FINANCIAL ASSURANCE FOR CLOSURE AND POST-CLOSURE CARE: Requirements for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities - A Guidance Manual

Costs: The registration fee for this conference is \$45.00 which includes luncheons, coffee breaks, and a copy of the EPA Guidance Manual.

Registration: To register for this conference, please complete the registration form and mail to:

NORTH CAROLINA STATE UNIVERSITY

Division of Continuing Education

P. 0. Box 5125

Raleigh, NC 27650

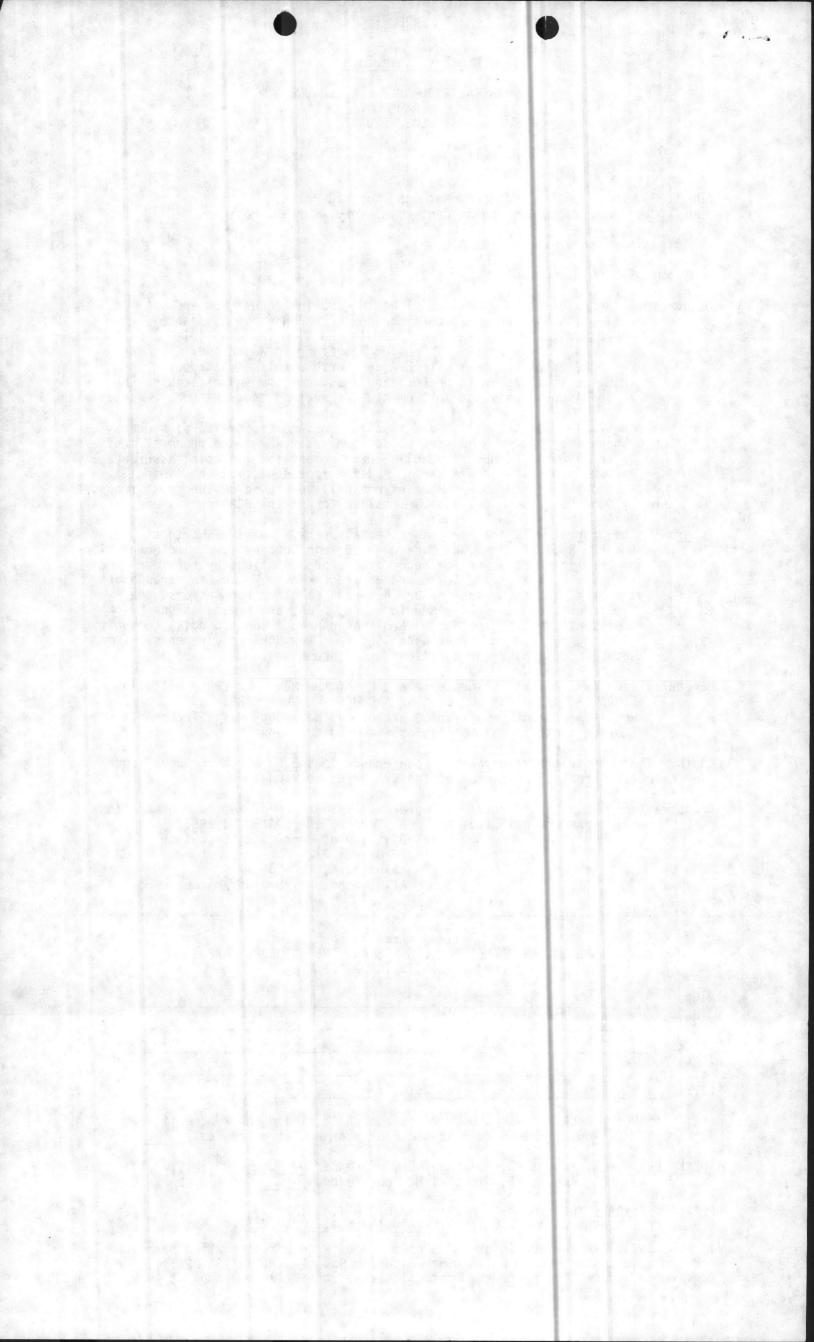
ATTN: Woody Fairbrother/Michelle Howell

Advance Registration Form
FINANCIAL ASSURANCE FOR CLOSURE AND POST-CLOSURE CARE
AND LIABILITY INSURANCE

NAME:			
FIRM:			
TITLE:			
ADDRESS:			
CITY:		STATE:	ZIP.
FEE: \$45.00	- Check must accompany would like NCSU to	ny registration or pl invoice for your reg	ease check here if you istration fce
* CHECK HERE	FOR: August 25, Rale FOR: August 26, Hicko	igh, NC Conference	<u>OR</u>
	04TE TUTO FORM FOR MU		

PLEASE DUPLICATE THIS FORM FOR MULTIPLE REGISTRATIONS.
PLEASE MAKE CHECKS PAYABLE TO: NORTH CAROLINA STATE UNIVERSITY.

If you would like further information on this conference registration procedure, etc., please contact Woody Fairbrother/Michelle Howell at (919/737-2261), or for conference information or course content, please contact Jerome Kohl at (919/737-2303).







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

July 7, 1982

MEMORANDUM:

TO:

Owners and Operators

Hazardous Waste Treatment, Storage

or Disposal Facilities in North Carolina

FROM:

W. Strickland, Head

Solid & Hazardous Waste Management Branch

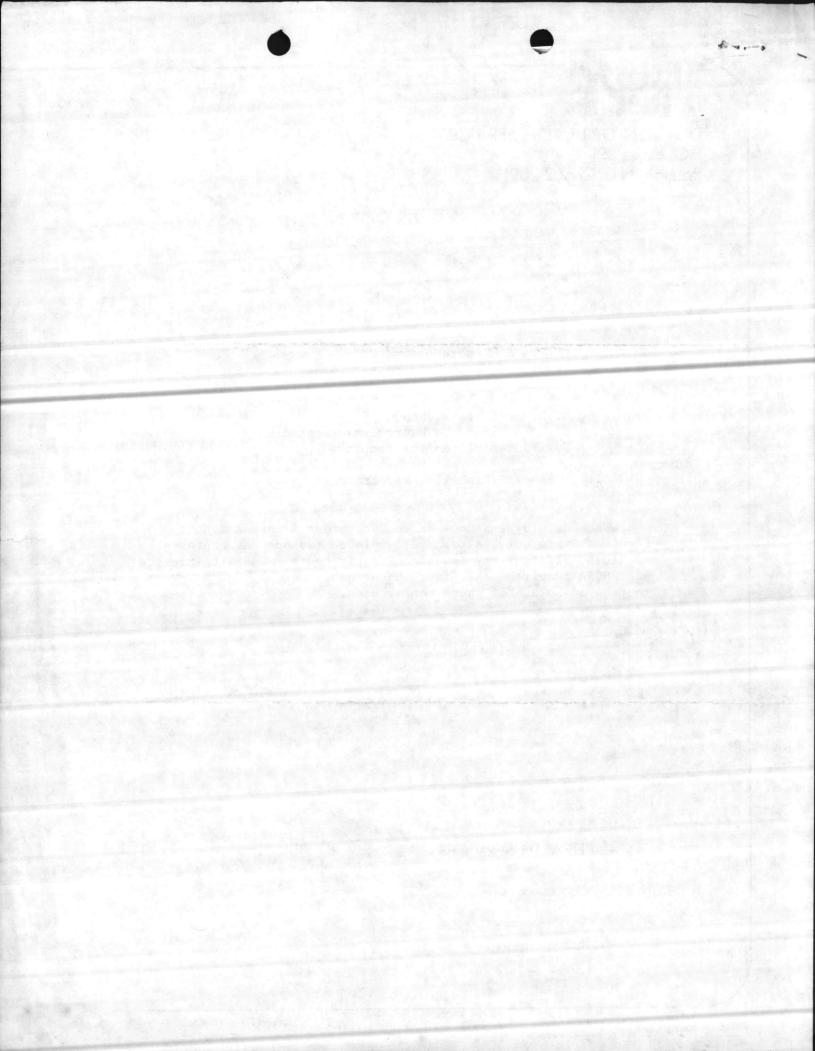
Environmental Health Section

SUBJECT: Financial/Liability Requirements

The Solid & Hazardous Waste Management Branch and North Carolina State University have developed two one day conferences on financial/liability insurance requirements to assist industry meet RCRA requirements. (see the attached sheet) You may want to take advantage of these conferences.

OWS:sms





MAIN/DDS/th 6240

JUL 0 2 1982

From: Commanding General To: Distribution List

Subj: Locating Chemical Agent Identification Sets

Encl: (1) CO LANTHAVFACENGCOM 1tr 114:500:aed 6280 of 14 Jun 1982

- 1. The enclosure provides information regarding disposal of the subject items. It is recommended addressees conduct a search for other subject items and advise this command of type and quantity found. Negative reply requested.
- Point of contact in this matter is Mr. Danny Sharpe, Natural Resources and Environmental Affairs Branch, Base Maintenance Division, extensions 2083/1690.

R. F. CALTA By direction

DISTRIBUTION CG 2DMARDIV CG 2DFSSG CO MCAS(H), NR

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PARTMENT OF THE NAVY ATLANTIC DIVISION NAVAL FACILITIES ENGINEERING COMMAND NORFOLK, VIRGINIA 23511

TELEPHONE NO.
444-9565
AUTOVON 690-9565
IN REPLY REFER TO:
114:SGO:aed
6280

1 4 JUN 1982

From: Commander, Atlantic Division, Naval Facilities Engineering Command

To: Distribution

Subj: Locating Chemical Agent Identification Sets (CAIS)

Encl: (1) Department of the Army 1tr DRXTH-SE of 15 April 1982

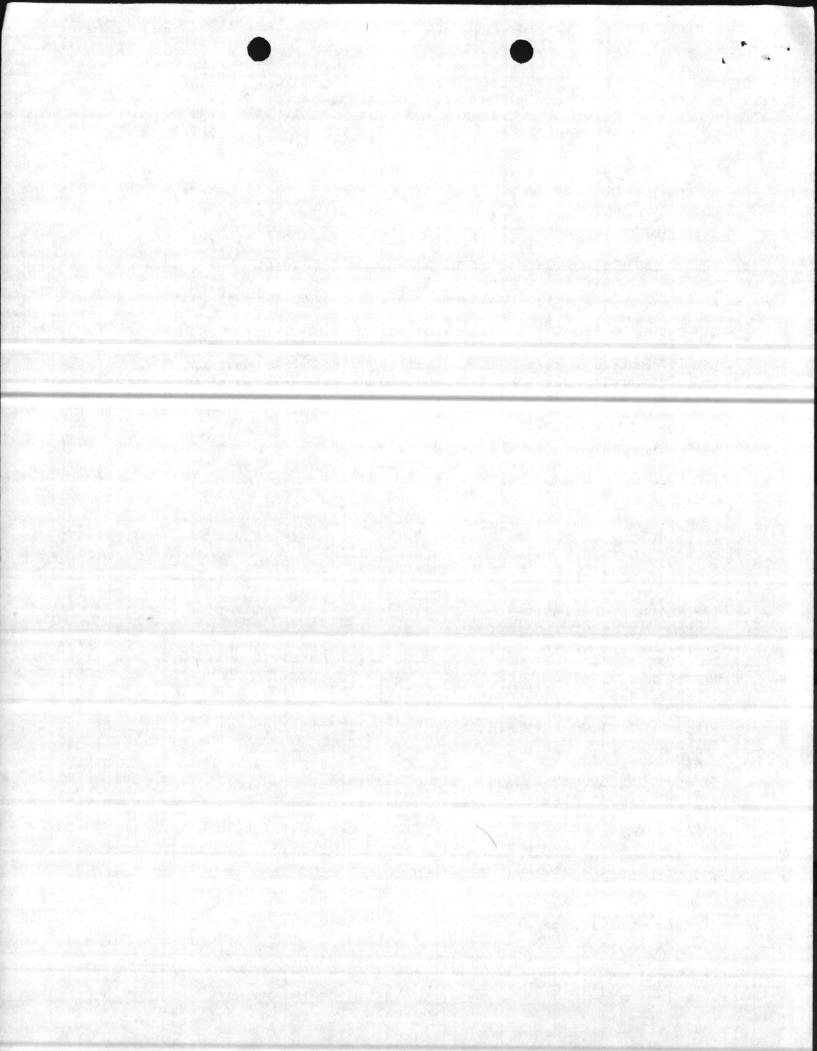
1. Enclosure (1) is forwarded to assist addressees in identifying and disposing of Chemical Agent Identification Sets (CAIS). Recommend addressees use information contained in enclosure (1) to conduct a final search for CAIS and if located advise the U.S. Army Toxic and Hazardous Materials Agency in accordance with enclosure (1).

2. Point of contact at this Command is Mr. Steve Olson, telephone (804) 444-9565, AUTOVON 690-9565 or FTS 954-9565.

J.R. Balley J. R. BAILEY, P.E. By direction

Distribution: NAS OCEANA NAVPHIBASE LITTLE CREEK NAVFAC CAPE HATTERAS NAS NORFOLK PWC NORFOLK NAVSTA NORFOLK COMEODGRU TWO FLEASWTRACENLANT NORFOLK FLECOMBATRACENLANT VIRGINIA BEACH FITCLANT NORFOLK FLETRACEN NORFOLK AFXTRACTY CAMP PEARY NSC NORFOLK NSC CHEATHAM ANNEX NAVAIREWORKFAC CHERRY PT NAVAIREWORKFAC NORFOLK NAVSECGRUACT SABANA SECA NAVWPNSTA YORKTOWN NAVORDSTA LOUISVILLE

(Continued on next page)

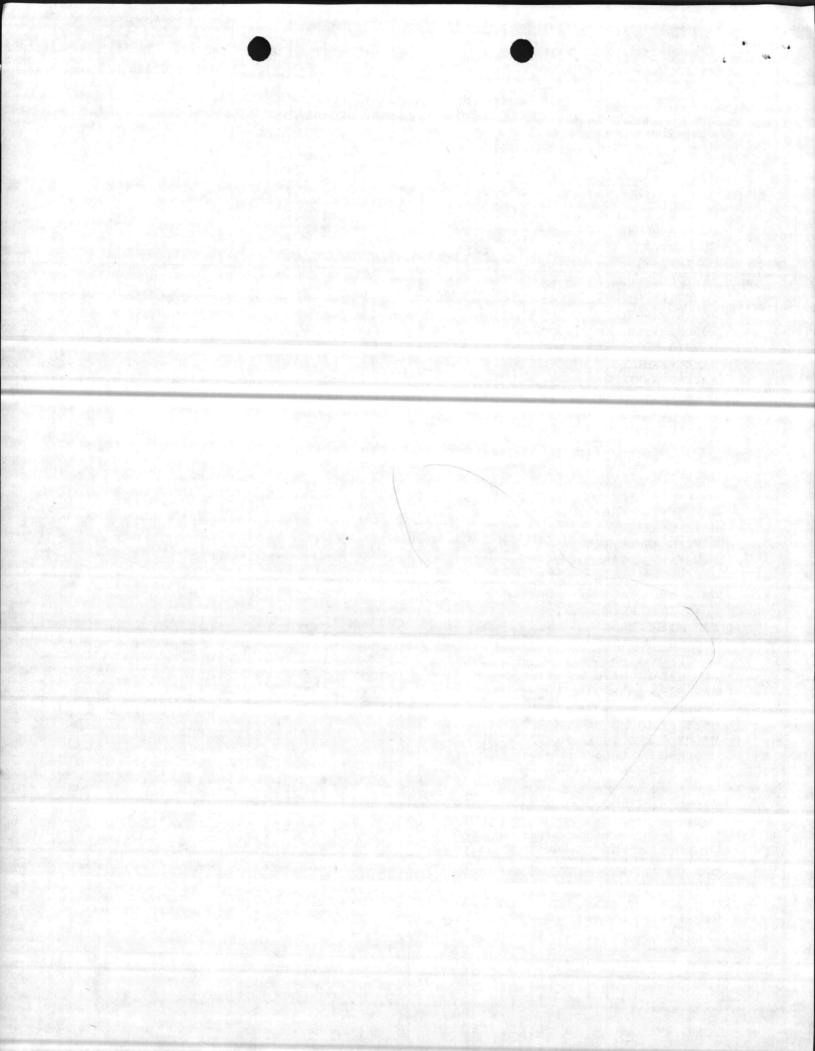


NREA

114:SGO:aed 6280

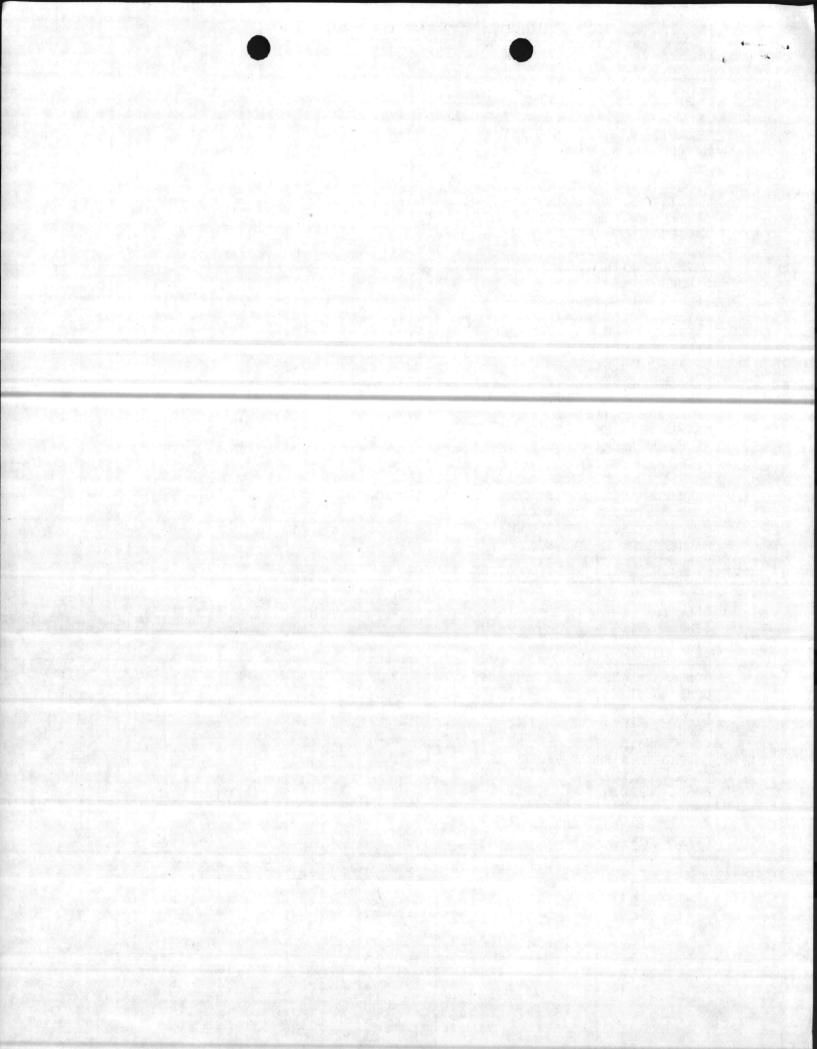
Distribution (continue) NORFOLKNAVSHIPYD PORTSMOUTH NAVREGMEDCEN PORTSMOUTH NAVSECGRUACT NORTHWEST NAVCAMSLANT NORFOLK MCAS H NEW RIVER CG MCAS CHERRY PT CG MCB CAMP LEJEUNE CG FMFLANT LANTFLT HEDSUPPACT COMDT AFSC COMTACWINGSLANT COMOPTEVFOR NAVSTA ROOSEVELT ROADS NAVENVIRHLTHCEN NORFOLK NAVENPVNTMEDU COMNAVBASE NORFOLK COMCBLANT NAS BERMUDA NAF LAJES NAS GUANTANAMO NAVSTA KEFLAVIK NAVFAC ARGENTIA NAVFAC BERMUDA NAVFAC BRAWDY NAVFAC KEFLAVIK NAVSTA GUANTANAMO NAVAVNWPNSFAC ST MAWGAN NAVAVNWPNSFAC DET MACHRIHANISH NAVACTDET HOLY LOCH NAF MILDENHALL NAS SIGONELLA NAVSUPPACT NAPLES NAVSUPPACT NAPLES DET GAETA NAVSUPPO LA MADDALENA NAVSTA ROTA NAVSUPPACT SOUDA BAY NAVMEDRSCHU THREE CAIRO NAVENPUNTMEDU SEVEN NAPLES NAVSECGRUACT AUGSBURG NAVSECGRUACT EDZELL NAVSECGRUACT KEFLAVIK NAVSECGRUACT SAN VITO DET NORMANNI NAVSECGRUACT TERCEIRA ISLAND NAVCOMMSTA KEFLAVIK NAVCOMMSTA NEA MAKRI NAVCOMMSTA THURSO

(Continued on next page)



Distribution: (continue) NAVCOMMDET SOUDA BAY ADMINSUPU BAHRAIN INACTSHIPFAC PORTSMOUTH NAVSTA PANAMA CANAL LANTFLTWPNTRAFAC ROOSEVELT ROADS NAVSECGRUACT GALETA NAVCOMMSTA BALBOA NAVMMACLANT NORFOLK NARU NORFOLK NAVMARCORESCEN WHEELING NAVRESCEN BALTIMORE NAVRESCEN SOUTH CHARLESTON NAVRESCEN CUMBERLAND NAVRESCEN HUNTINGTON NAVMARCORESCEN NORFOLK NAVMARCORESCEN NEWPORT NEWS NAVRESCEN PARKERBURG NAVMARCORESCEN RICHMOND NAVMARCORESCEN ROANOKE NAVRESCEN STAUNTON NAVRESCEN LEXINGTON NAVMARCORESCEN LOUISVILLE MARCORESTRACEN BALTIMORE MARCORESTRACEN LYNCHBURG MARCORESTRACEN RICHMOND MARCORESTRACEN ROANOKE MARCORESTRACEN SOUTH CHARLESTON

COPY to:
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COMSUBLANT
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COMNAVSURFLANT
COMOCEANSYSLANT
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COMNAVFORCARIB
COMFAIRCARBID
CMC
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DEPARTMENT OF THE ARMY TOXIC AND HAZARDOUS MATERIALS A

ABERDEEN PROVING GROUND, MARYLAND 21010

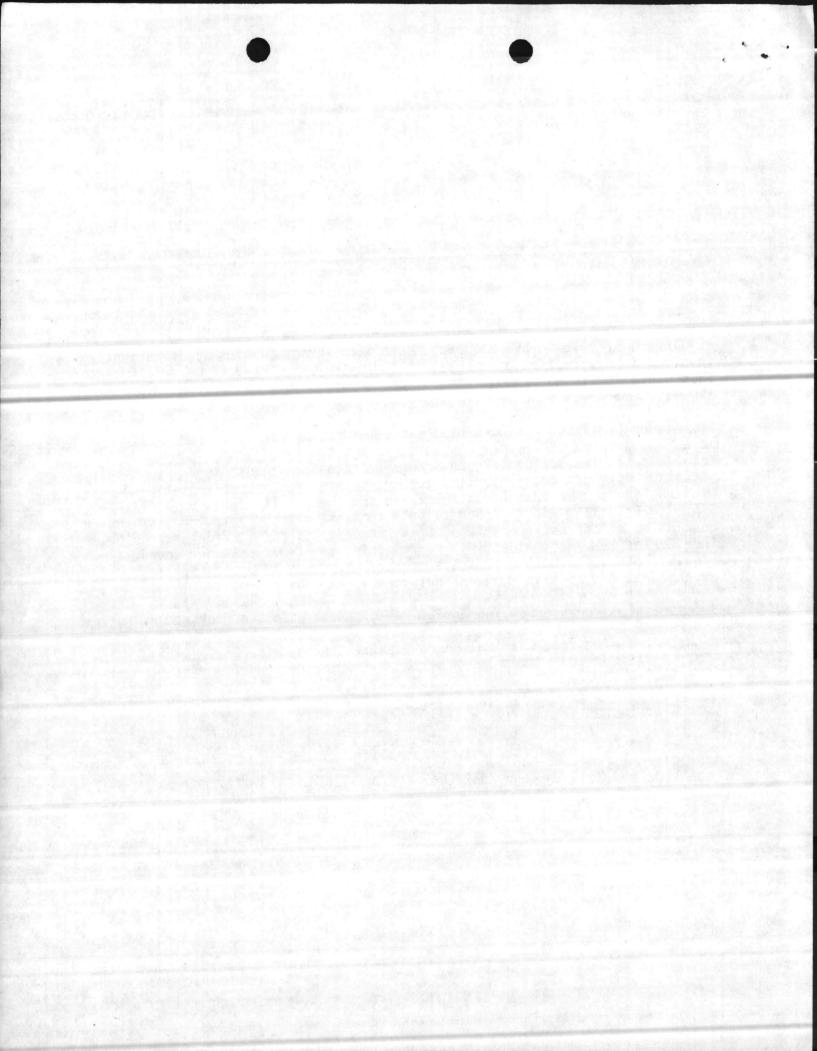
DRXTH-SE

15 APR 1982

SUBJECT: Final Effort for Locating Chemical Agent Identification Sets (CAIS)

SEE DISTRIBUTION

- 1. The US Army Toxic and Hazardous Materials Agency (USATHAMA) is currently involved in destruction of obsolete CAIS in the Department of Defense inventory. This operation is to be completed by December 1982 at the Rocky Mountain Arsenal (RMA), Commerce City, CO.
- 2. Although all known stocks of these sets were shipped from world-wide locations in June 1980, small numbers of sets continue to be discovered in locations such as National Guard Armory storage areas and moth-balled naval vessels. The most cost effective way to dispose of these sets in accordance with Public Laws 91-121 and 91-441 is in the RMA demilitarization facility. Since that facility is intended to be decommissioned early in 1983, at the conclusion of current operations, it is requested that one final search of your inventories be made to identify any remaining sets. If sets are found, it is requested that you advise this Agency not later than 1 August 1982 so arrangement can be made to transport them to RMA for disposal.
- 3. To assist your search, nomenclatures of these sets are provided as follows:
- a. Training Set, Chemical Agent Identification, M72 (CAITS), FSN 1365-051-1807, DODAC Code K945 (Box 12" X 5 1/2" X 4").
- War Gas Identification Set, Instructional, M1, FSN 1365-368-6154, DODAC Code K955 (Large Box 30 3/8" X 15 1/2" X 11 3/4").
- c. Set Gas Identification, Instructional (NAVY): HN and Set Sample Replacement, FSN 1365-038-5183 and FSN 1365-608-5322 thru 1365-608-5329, DODAC Code X302 and X545 through X552 (Box 7 1/2" X 16" X 11 3/4").



DRXTH-SE

SUBJECT: Final Effort for Locating Chemical Agent Identification Sets

- d. Toxic Gas Set, HD, M1, FSN 1365-219-8574, DODAC Code K941 (Pig).
- e. Toxic Gas set, HD, M1, FSN 1355-563-4146, DODAC Code K942 (Pig or 10-gallon pail).
- f. War Gas Identification Set, Instructional, M1, FSN 1354-025-3273 and FSN 1365-025-3283, DODAC Code K951 and K952 (Pigs).
- g. War Gas Identification Set, Instructional, AN-M1A1, FSN 1365-323-7728 and FSN 1365-338-0735, DODAC Code K953 and K954 (Pigs).
- 4. These sets can be found packaged in wooden boxes or in cylindrical steel shipping containers referred to as pigs. The sets are shown in the inclosed photographs. Both boxes and pigs are usually painted gray, blue, Army olive drab or black. Print on them is typically in black, green or yellow and usually refers to manufacture at Edgewood Arsenal, MD.
- 5. Points of contact for questions involving reporting, transporting and identification of these sets are Mr. William Brankowitz, USATHAMA, AV 584-2424/2556 or LT Lucas Polakowski, Technical Escort Unit, Edgewood Area of Aberdeen Proving Ground, AV 584-4331/3516.

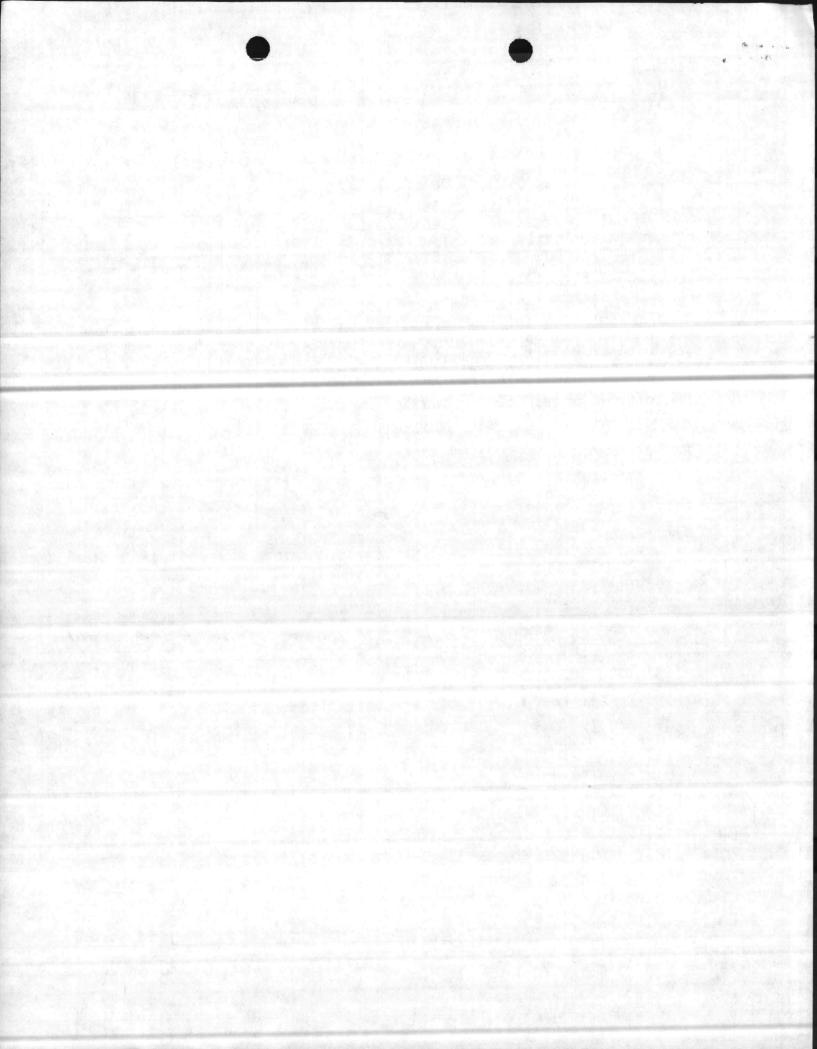
2 Inclosures

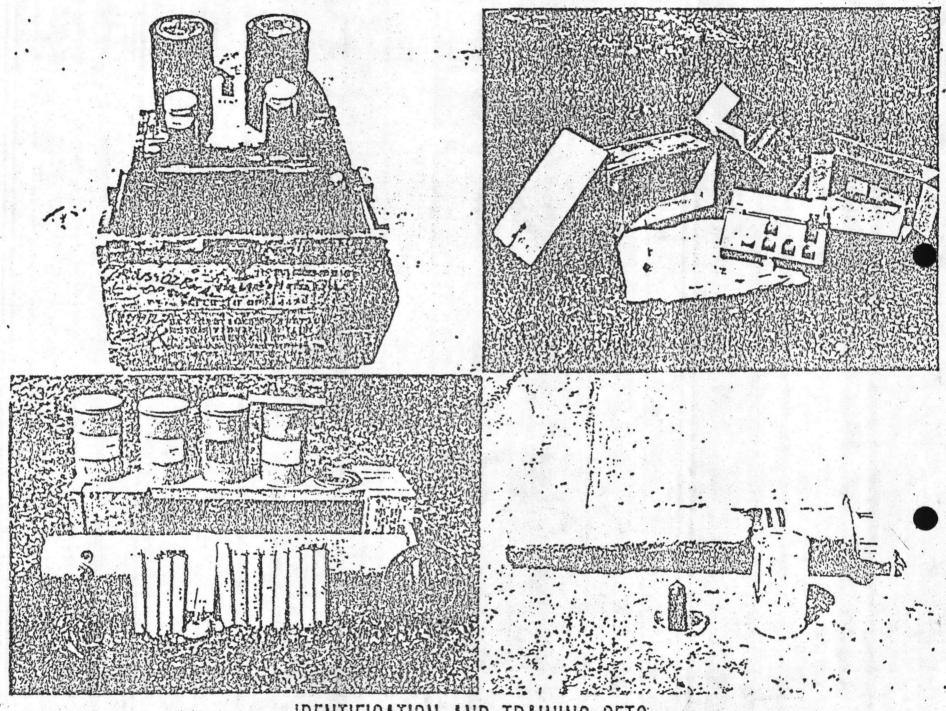
1. Photo, Identification and Training Sets

 Photo, Navy Bunker w/Cylinders & Boxes JOHN D. SPENCE

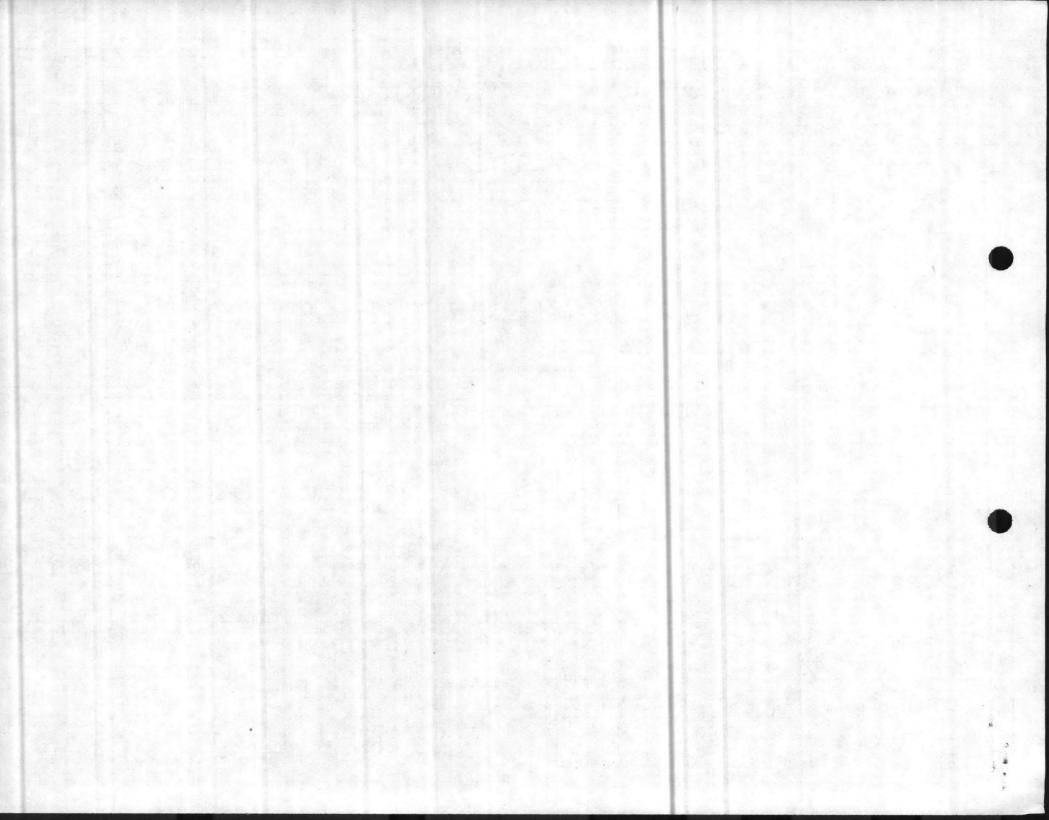
Colonel, CmlC Commanding

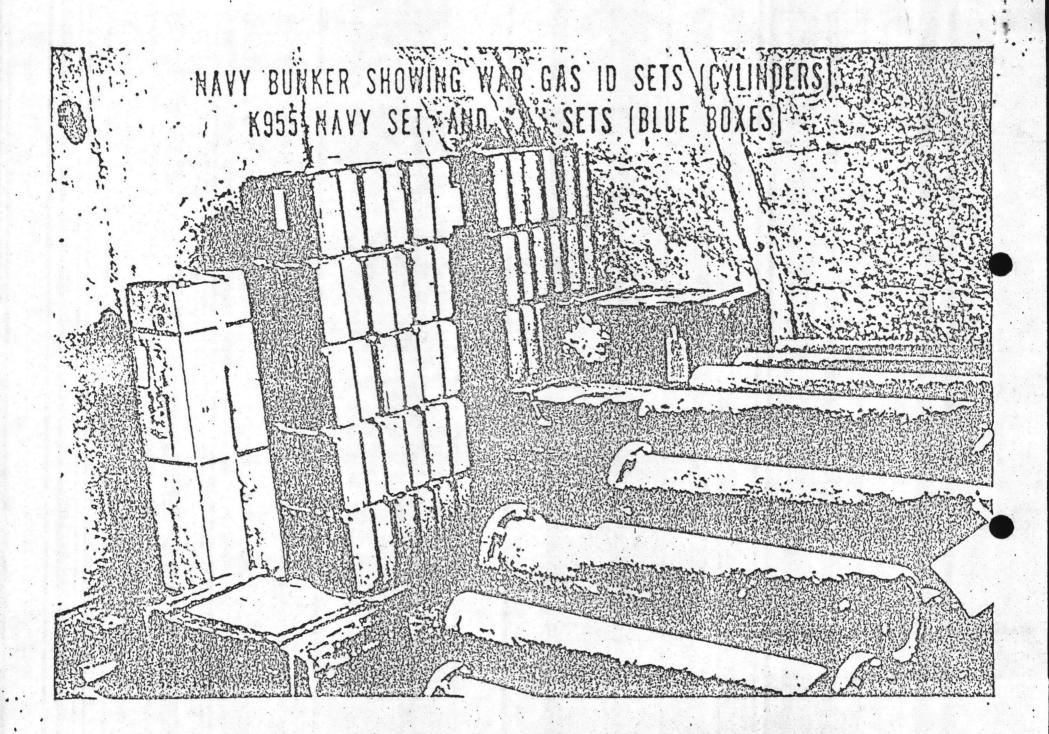
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IDENTIFICATION AND TRAINING SETS

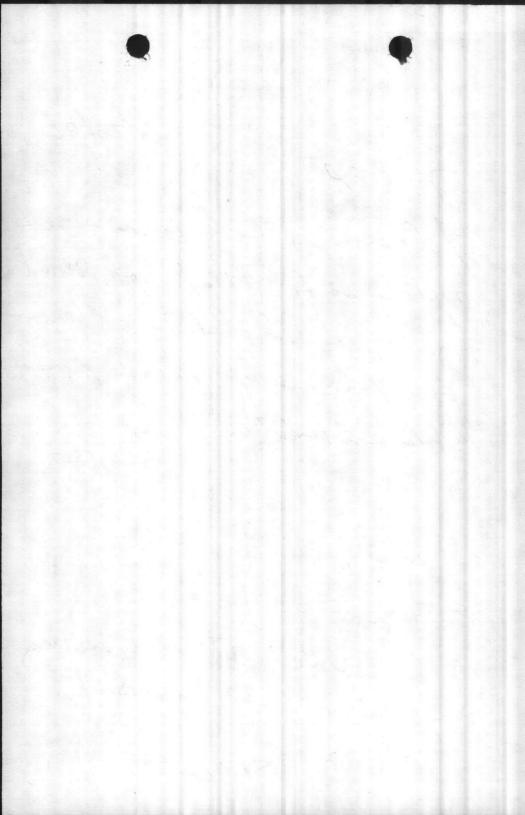






6240 BASE MAINTENANCE DIVISION Marine Corps Base Camp Lejeune, North Carolina 28542 To: NREA
Subj: peliar - attached is some mise info that Col Mount had be holding, your for file etc. Alease give me Statu or Beta buttom. Thy BUE PWO sent an ESR to Norfolk ON June 9Th requesting ASSISTANCE WITH DISGISAL. 0, Shaire

Juli gr



From: Base Maintenance Officer

To: Assistant Chief of Staff, Facilities

Subj: State Hazardous Material Inspection of 21-22 June 1982

Ref: (a) FONECON btwn LtCol. Fitzgerald, AC/S, Fac. and J. I. Wooten, BMaintDiv on 23 Jun 82

Encl: (1) Summary of State Hazardous Waste Management Inspection at MCB, CL and MCAS(H) NR on 22 June 82

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

R. F. CALTA

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para contra de aluações de Securios		

MAIN/DDS/spk 6240 24 June 1982 Supervisory Ecologist Director, Natural Resources and Environmental Affairs Branch Tor Subi: State and Federal Hazardous Waste Management Regulations (a) On-site inspection of MCB, by Mr. Jerry Rhodes and Ray Church, NC Ref: Dept. of Human Resources of 21 June 82 (b) On-site inspection of MCAS(H) NR, by Mr. Jerry Rhodes and Ray Church, NC Dept. of Human Resources of 22 June 82 Encl: (1) Inspection for Interim Status Standards for Owner/Operator of Hazardous Waste Management Facilities. 1. During reference (a), State inspectors visited the following sites/organizations to determine compliance with subject regulations. a. Natural Resources and Environmental Affairs Branch Traffic Management Office (TMO) Long-term Storage Facility at TP-451 d. Defense Property Disposal Office (DPDO) The inspectors indicated that Base was in compliance with interim status standards for hazardous waste generators/storers/transporters. The inspectors were critical of timeliness of removal of waste from generating shops. The inspectors recommended that as soon as the storage facility (TP-451) was completed, Base should request a state inspection of building TP-451. It appears that state inspectors are willing to "certify" the adequacy of the completed facility. This "certification" would be an important factor during negotiations to transfer operation of the facility to DPDO. 2. The enclosure summarizes discrepancies identified during reference (b) conducted by state regulatory personnel to determine compliance with the subject regulations. The following discusses most significant problemsareas: a. Contigency Plan and Emergency Procedures. Cited for not publishing name of on-scene coordinator (OSC) for hazardous material emergency response. The station S-4 officer, LtCol Nelson and Supervisory Ecologist, D. Sharpe both stressed to state inspectors that publishing names of coordinator in a Base Order was not desirable. State inspectors indicated they would research the legality of utilizing OSC's title in lieu of name. It is recommended that Staff Judge Advocate be requested to review the matter and express an opinion. b. Manifest, System, Recordkeeping and Reporting. These discrepancies related to failure to obtain a manifest signed by the operator of Camp Lejeune Long-term Storage Facility for a shipment of wastes made in February 1981. Also cited for storage over 90 days. c. Use and Management Containers. Failure of generating shops to conduct weekly inspection of storage areas for hazardous waste and failure to label and

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MAIN/DDS/spk 6240 24 June 1982

Subj: State and Federal Hazardous Waste Management Regulations close container properly.

- 3. State inspectors indicated that the formal state followup report would identify the failure of Base (i.e., DPDO/TMO) to move the wastes to Base storage facility as the major cause of MCAS(H) NR non-compliance with the 90 day limit. State inspectors appeared pleased with the efforts made by MAG(26) and MAG(29) supply organizations to assist with disposal of hazardous wastes. Inspectors advised MCAS(H) representatives that proposed chrome plating operation may require modification of MCAS(H) NR registration with EPA/State.
- 4. Shop visits and discussion with supply officers indicated the following management considerations:
- a. Routine use of acetone, methyl ethyl ketone and other specifically regulated solvents, degreasers and paints.
- b. Probable unauthorized disposal via waste oil (inspectors did not cite because no specific discrepancy observed.
- c. Desirability of stocking 5 gallon containers of regulated solvents rather than 55 gallon drums along with tight control of volume stored in the shops. These appear to be critical means of reducing waste volumes.
- d. Need to ensure that shops generating waste are equipped with collection and/or storage containers which are in good condition, with appropriate lids and marking labels.
- e. Lack of suitable storage facilities for hazardous materials awaiting distribution to shops.

D. D. SHARPE

Starth Polife.

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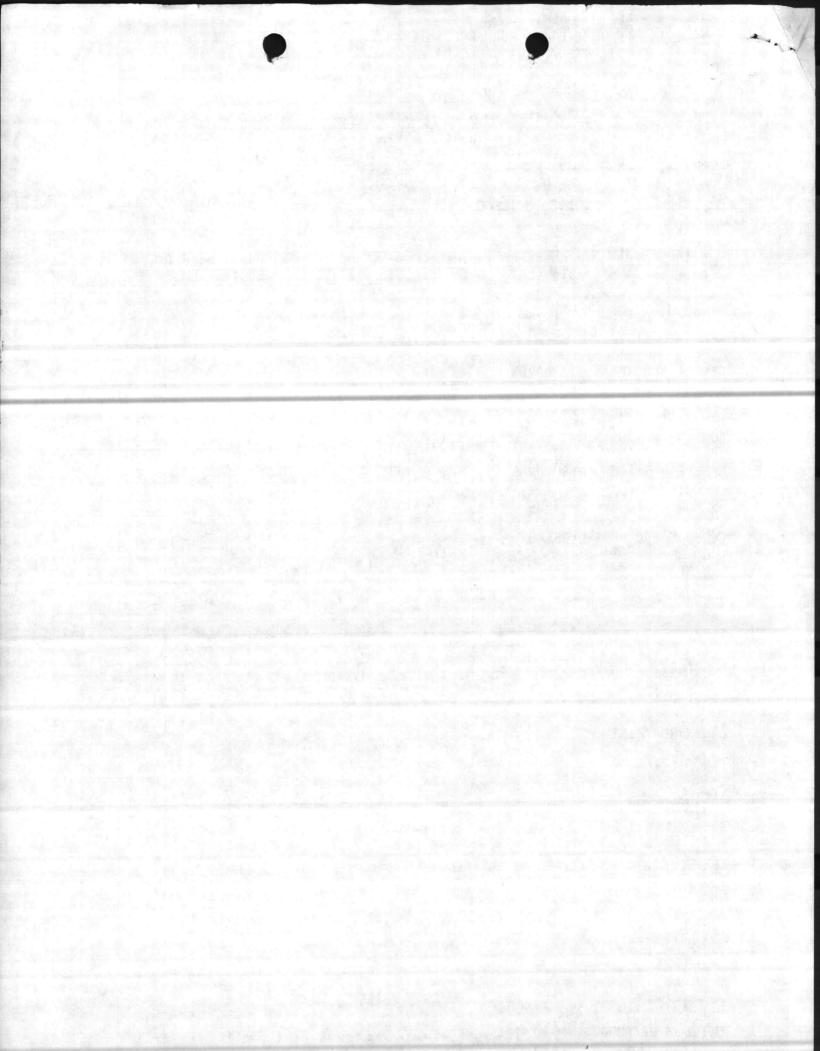
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4 1 7 100 201 4

INSPECT FORM FOR INTERIM STATUS STANDARDS FOR OWNER/CRATOR OF HAZARDOUS WASTE MANAGENT FACILITIES

	ne of Site	EPA I.D.	()	1.1 -11	Count	low.
Loc	cation		Signa	ture of	Facilit	y Contact
	/22/22	ulion in Lydin	ling	. Pl-	ly	Ramol 20
Dat	ie in the second se		Signa	ture of	Inspect	or(s)
INS	TRUCTIONS: Place a check to Applicable (NA).	indicate Complian Cite specific vi	ce (C),	NonComp	oliance tion No.	(NC) or Not
			<u>c</u>	NC .	<u>NA</u>	Violation(s)
1.	GENERAL		-			
2.	GENERAL FACILITY STANDARDS				~	111153
3.	PREPAREDNESS AND PREVENTION		_			
1.	CONTINGENCY PLAN AND EMERGE	NCY PROCEDURES			-40	265.52
5.	MANIFEST SYSTEM, RECORDKEEP	ING, AND REPORTING		V		262.31
5.	GROUND-WATER MONITORING				~	
<i>'</i> .	CLOSURE AND POST-CLOSURE				V	
3.	FINANCIAL REQUIREMENTS		eliko oraș	*		1.7(1-
	USE AND MANAGEMENT OF CONTA	INERS		V		265.173
١.	TANKS				~	
•	SURFACE IMPOUNDMENTS				-	
•	WASTE PILES				V	
	LAND TREATMENT				_	
	LANDFILLS				~	
	INCINERATORS				~	
· .	THERMAL TREATMENT				_	
	CHEMICAL, PHYSICAL, AND BIO	LOGICAL TREATMENT			~	
3.	UNDERGROUND INJECTION		_			
- 2	~.			YES		<u>NO</u>
	DHS Form 3010 (7-81)	Imminent hazard		()		(4



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

Date 7-15-82

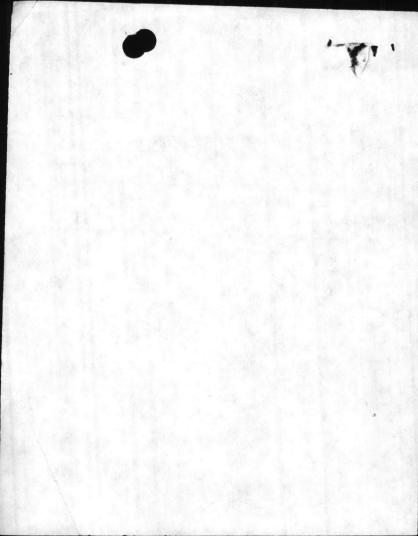
From: Director, NREAB
To: Dang Su attach - What is Sub.j: this about ? Have you seen the 7 July the from EPA.? Julia Didnot get 7 June Letter, Ecidenthy EPA People in Atlanta got Centused, about LANT DIUS 22 Feb 8> Letter See NO Icasur for us to take any Action. Sharpe

ar Loa Bot

ROUTING SLIP 13 Jul 82

	ACTION	INFO	INITIAL
BMO		1	0
ABMO			
ADMIN		1	5
ENVIOR AFF			
F&A SEC			19
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M&R			
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UTIL		2.000	
SECRETARY		The second secon	

COMMENTS:





DEPARTMENT OF THE NAVY

ATLANTIC DIVISION

NAVAL FACILITIES ENGINEERING COMMAND

NORFOLK, VIRGINIA 23511

TELEPHONE NO.

(804) 444-9565

IN REPLY REFER TO

114:SGO:aed 6280 13 July

2 3 JUN 1982

U.S. Environmental Protection Agency Region IV 345 Courtland Street Atlanta, Georgia 30365

Re: Marine Corps Base, Camp Lejeune - NC6170022580

Marine Corps Air Station, Cherry Point - NC1170027261

Naval Facility, Cape Hatteras - NC8170022570

Gentlemen:

With reference to your letter of 7 June 1982 concerning enclosure (1), be advised that the U.S. Navy is not attempting to withdraw Resource Conservation and Recovery Act (RCRA) hazardous waste permit applications and notifications previously forwarded by enclosures (2) and (3) for subject activities. Enclosure (1) was prepared in accordance with enclosure (2) to document the non-hazardous nature of Domestic Wastewater Treatment Plant sludges which were assumed to be non-hazardous when filing RCRA Hazardous Waste Part A permit applications. These sludges were assumed to be non-hazardous based upon minimal upstream industrial waste sources and manufacturing operations.

U.S. Naval Facility, Cape Hatteras is a small quantity generator not requiring submission of HW notification or Part A permit application. This Activity was referenced in enclosure (2) as a small quantity generator and as the owner of a Domestic Wastewater Treatment Plant.

In accordance with your letter of 7 June 1982, all future HW correspondence will be mailed to the State of North Carolina with copies to EPA Region IV.

Point of contact on this matter is Mr. Steve Olson telephone (804) 444-9565 or FTS 954-9565.

Sincerely yours,

J. R. BAILEY, P.E.
Head, Environmental Quality Branch
Utilities, Energy and Environmental
Division
By direction of the Commander

Enclosures

- (1) LANTNAVFACENGCOM letter 114:JGW 6280 of 22 Feb 1982 (Non-hazardous nature of WTP sludges
- (2) RCRA Part A Application letter 19 Nov 1980
- (3) HW notification letter 18 Aug 1980

Copy to: (See page 2)

MAN

2 3 JUN 1982

Copy to:
Solid and Hazardous Waste Management
Branch
Environmental Health Services Branch
Department of Human Resources
P. O. Box 2091
Raleigh, NC 27602
Attn: Mr. O. W. Strickland, Head

Commanding General
Marine Corps Base
Camp Lejeune, NC 28542

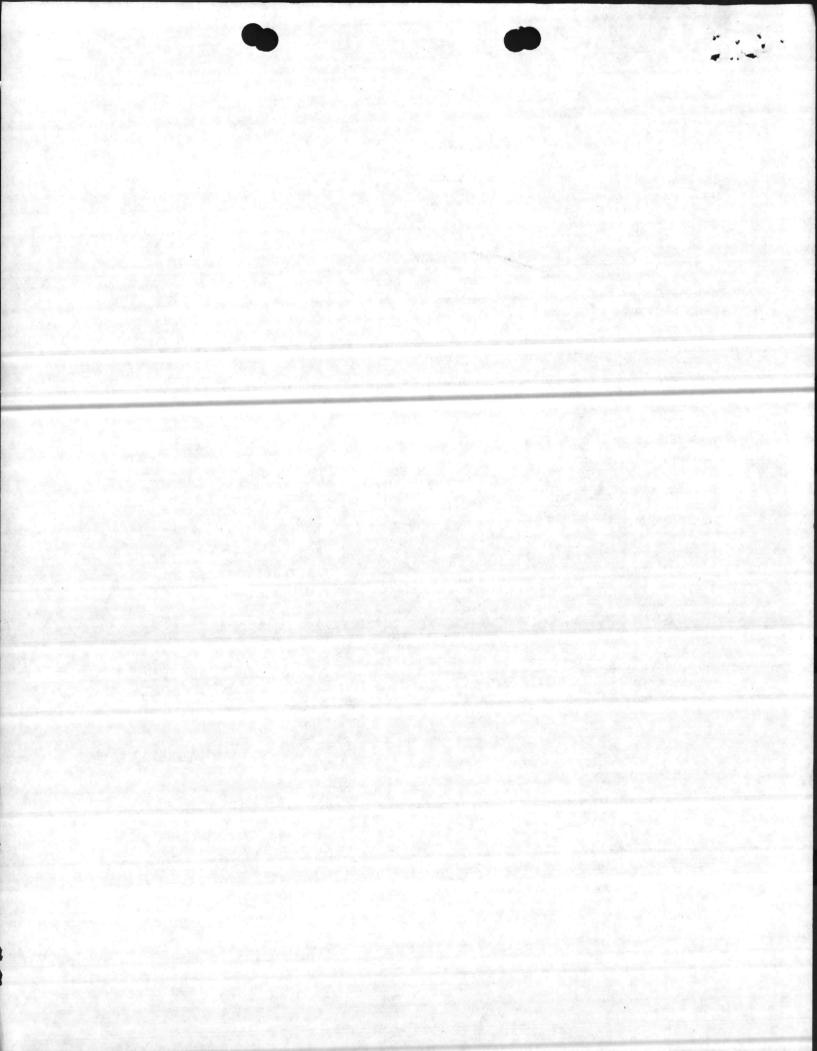
Commanding General
Marine Corps Air Station
Cherry Point, NC 28533

Commanding Officer Naval Facility Cape Hatteras Buxton, NC 27920

Commandant of the Marine Corps Headquarters, U.S. Marine Corps Washington, DC 20380

Commander
Oceanographic Systems, Atlantic
Box 100
Norfolk, VA 23511

Commander
Naval Facilities Engineering Command
200 Stovall Street
Alexandria, VA 22332
Attn: Code 112



444-9565 AUTOVON 690-9566

114:JGW 6289

2 2 FEB 1982.

U.S. Environmental Protection Agency Region IV RUBA Activities 345 Courtland Street Atlanta, GA 30308

Gentlemen:

In reference to this Command's Hazardous Wasta (HW) Permit Application transmittal latter of 18 Hovember 1980, the encloses laboratory analysis data sheets are provided as verification of the non-HW nature of domestic wastewater treatment plant sludges from:

Marine Corps Base, Camp Lejeune Marine Corps Air Station, Cherry Point Haval Facility, Cape Hatteras Seven Plants Three Plants One Plant

You will note that the initial analyses of two sludges from Harine Corps Air Station, Cherry Point (Bogue and Atlantic), and one from Harine Corps Base, Camp Lejeune (Camp Geiger) indicated high selenium levels. Unable to determine any source of selenium and suspecting analytical error, re-sampling and re-analysis were initiated which subsequently confirmed non-EW characteristics.

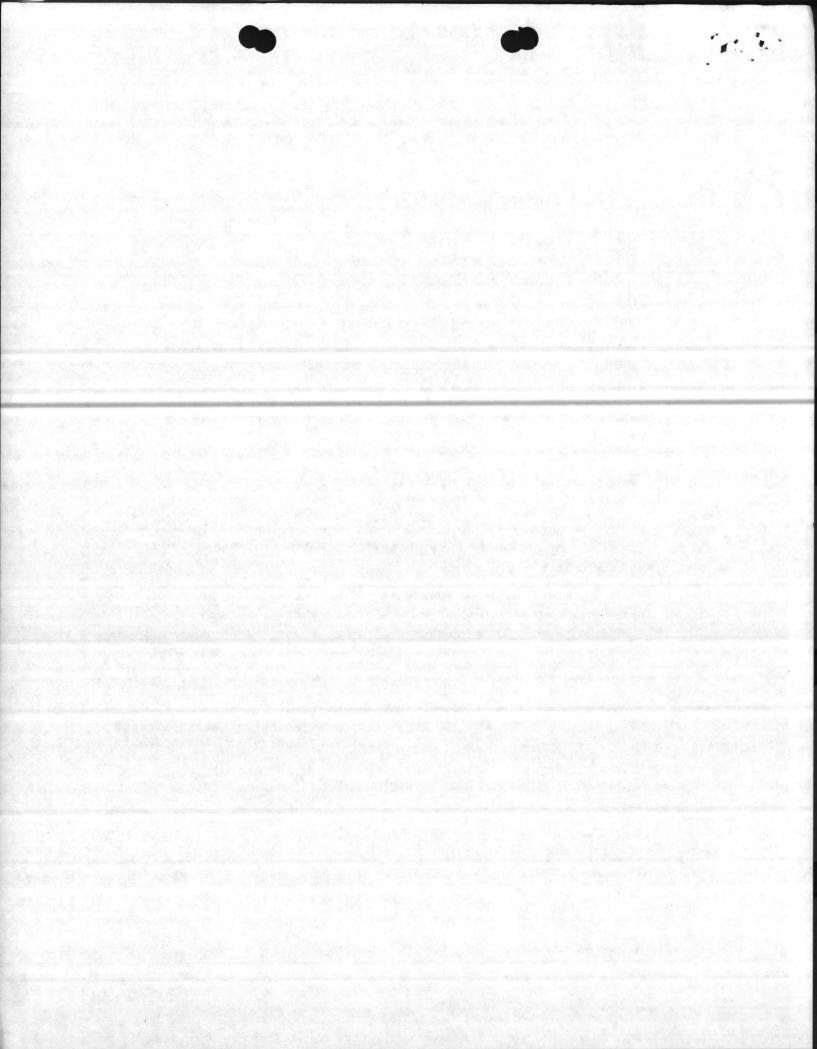
Should you have any questions concerning this matter, the point of contact is Mr. Jerry Wallmayer at telephone (804) 444-9566.

Sincerely yours,

J. R. PAILEY, P.E.
Head, Environmental Quality Branch
Utilities, Energy and Environmental
Division
By direction of the Commander

Copy to: (See page 2)

Wallmeyer Conners 2/19/82 nrs



EPA REGION IV HAZARDOUS WASTE PERMIT APPLICATION SUMMARY

	Activity EPA HW ID No.	General <u>Description</u>	Location	Domestic WWTP* Sludge Total Avg. WWTP MGD	Storer	Treater	Disposer	Transporter	Remarks
1	Naval Ordnance Station, Louisville KY 5170024173	Ordnance/equipment storage/handling/ repair (including plating)	Louisville, Kentucky	No .	Yes	Yes	No	No	Industrial Wastewater Treatment Plant (IWTP) will be upgraded via an IWTP upgrade currently under study (i.e., only HW treatment).
2.	Marine Corps Base, Camp Lejeune NC 6170022580	Weapons training, fuel/supplies/ ordnance storage/ handling (fuel tanks/warehouses/ magazines)	Jacksonville, North Carolina	Yes ~7.5	Yes	No	Yes	Yes	Transport consists only of transport of HW from Marine Corps Air Station, New River. (See application for specifics on asbestos disposal) and HW transport to Marine Corps Air Station, Cherry Point IWTP.
3.	Marine Corps Air Station, Cherry Pt. C 1170027261	Air station, air- craft repair (including plating)	Havelock, North	Yes ~2.0	Yes	Yes	Yes	Yes	Transport consists only of transporting small quantities from outlying facilities to Marine Corps Air Station, Cherry Point. Treatment consists only of an IWTP and a planned solvent recovery via distillation unit. Disposal consists only of asbestos and the IWTP sludge. (See application for specifics on asbestos disposal.) Application includes DPDO and NARF.

^{*}Wastewater Treatment Plant (flow of wastewater not sludge)

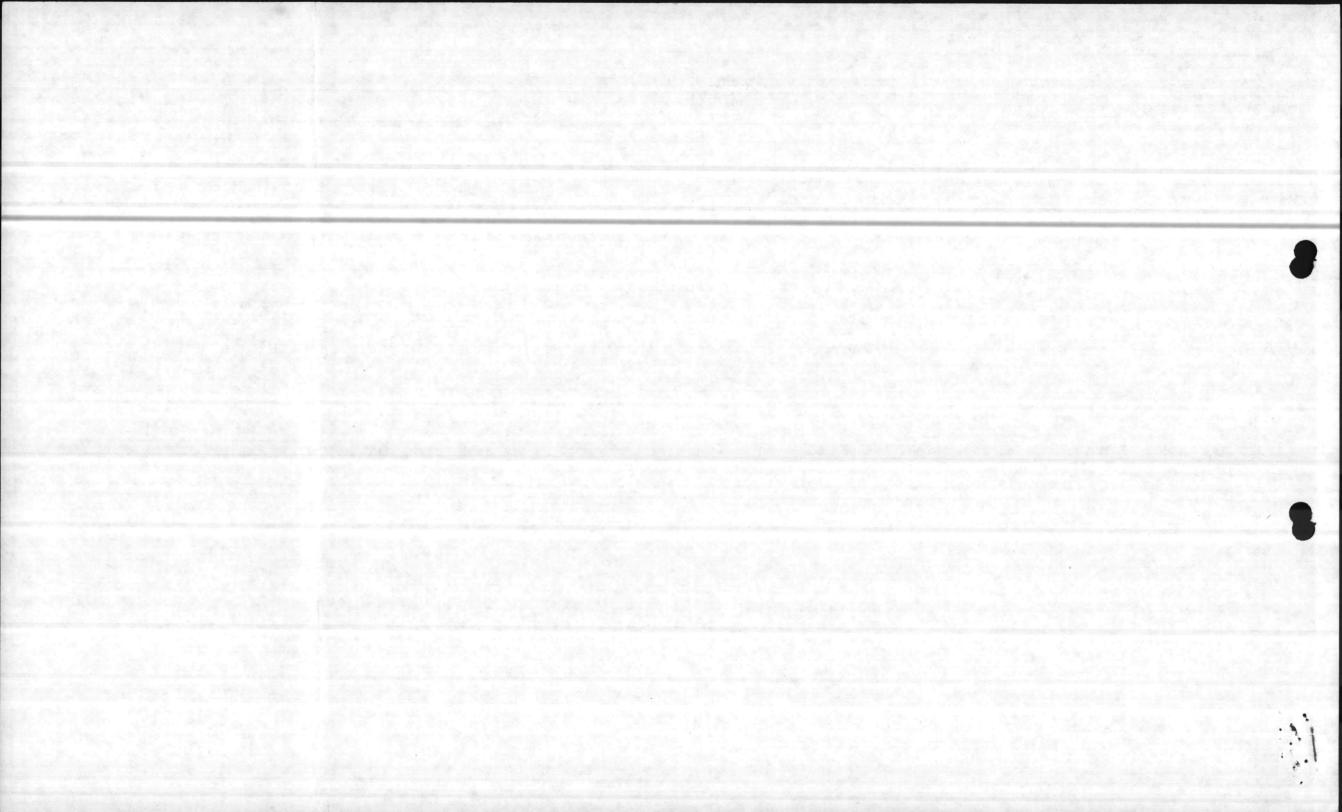


Activity EPA HW ID No.	General <u>Description</u>	Location	Domestic WWTP* Sludge Total Avg. WWTP MGD	Storer	Treater	Disposer	Transporter	Remarks
Marine Corps Air Station, New River NC 8170022570	Air station, air- craft (minor) repair	Jacksonville, North Carolina	No	No	No	No	No	Permit not required as on-site storage of HW will not exceed 90 days prior to off-site disposal.
Cape Hatteras	Collect oceano- graphic data	Cape Hatteras, North Carolina	Yes 0.030	No	No	No	No	Permit not required as on-site storage of HW will not exceed 90 days prior to off-site disposal.
Harvey Point	Training	Harvey Point, North Carolina	No	No	No	No	. No	Permit not required as on-site storage of HW will not exceed 90 days prior to off-site disposal.

mmary: (3) Form 1 applications and (5) Form 3 applications.

(2) There is no known underground injection of HW. UIC applications will be for Class V wells only.

te: (1) Primary intent of the activities in the LANTNAVFACENGCOM area is to contract out most HW disposal (e.g., most operations consist of stored drums awaiting contractor disposal).



114:PAR 6280

1980 VC 3

CERTIFIED MAIL RETURN RECEIPT REQUESTED

U.S. Environmental Protection Agency Region IV RCRA Activities 345 Courtland Street. N.B. Atlanta, GA 30308

Gentlemen:

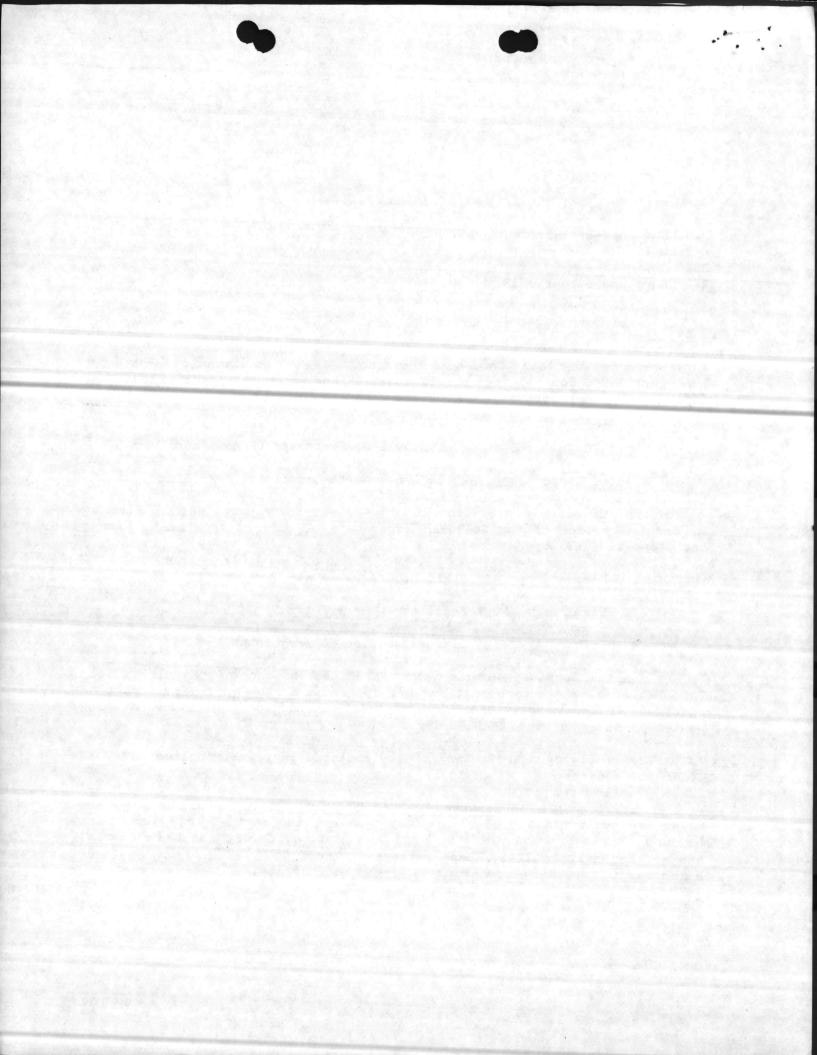
In reference to this Command's Hazardous Waste Notification letter of 18 August 1980, Consolidated permit applications (Form 1) and Hazardous Waste (HW) permit applications (Form 3) are herein forwarded for the following activities:

- 2. Naval Ordnance Station, Louisville, Kentucky: Form 1 and Form 3.
- b. Marine Corps Base, Camp Lejeune, North Carolina: Form 1 and Form 3.
- c. Marine Corps Air Station, Cherry Point, North Carolina: 1 Form and a Form 3 for each of the following operators of onboard treatment, storage and disposal (TSD) operations:
 - 1. Marine Corps Air Station, Cherry Point
 - 2. Naval Air Rework Facility, Cherry Point
 - Defense Property Disposal Office, Cherry Point
- d. Marine Corps Air Station, New River, North Carolina; Kaval Facility, Cape Hatteras, North Carolina; and Harvey Point, North Carolina: Permit not required as these activities do not treat or dispose nor store hazardous wastes on-site for more than 90 days.

To ensure complete understanding of the enclosed HW permit applications, the following general statements apply:

1. Domeatic Wastewater Treatment Plant Sludges - Domestic wastewater treatment plant sludges are generated at the Marine Corps Base, Camp Le jeune (7 plants), and Marine Corps Air Station, Cherry Point (3 plants), and at the Naval Facility, Cape Hatterss. These sludges are not considered RAKOWSKI hazardous waste based upon minimal upstream untreated industrial wastes or Brite

11/17/80



manufacturing operations. These sludges will be analyzed for the characteristic of Extraction Procedure (EP) toxicity in accordance with 40 CFR 261.24. Results will not be available prior to 19 November 1980. These results and certification that the domestic wastewater treatment sludges at these activities should not be classified as a HW will be forwarded to you at a later date.

- 2. Defense Property Disposal Office (DPDO) The DPDOs have been directed to assume responsibility for disposal of the majority of hazardous wastes generated by all Department of Defense activities. A Form 3 listing the MCAS CHERRY POINT DPDO as an operator of a HW treatment, storage or disposal (TSD) facility onboard the activity has been included. In many cases for the near future, the DPDOs will not be capable to physically accept custody of HW, but will be responsible for establishing disposal contracts.
- 3. Other TSD Operators Major TSDs, tenants onboard an activity, have been identified as operators with the inclusion of a separate Form 3. A typical example includes the storage of large quantities of hazardous waste at a major industrial waste generator such as the Naval Air Rework Facility.

Please note that also herein forwarded is a summary of the hazardous waste permit applications including general descriptions, EPA HW identification numbers, activity locations, and a summary of the hazardous waste activity requiring interim status permits.

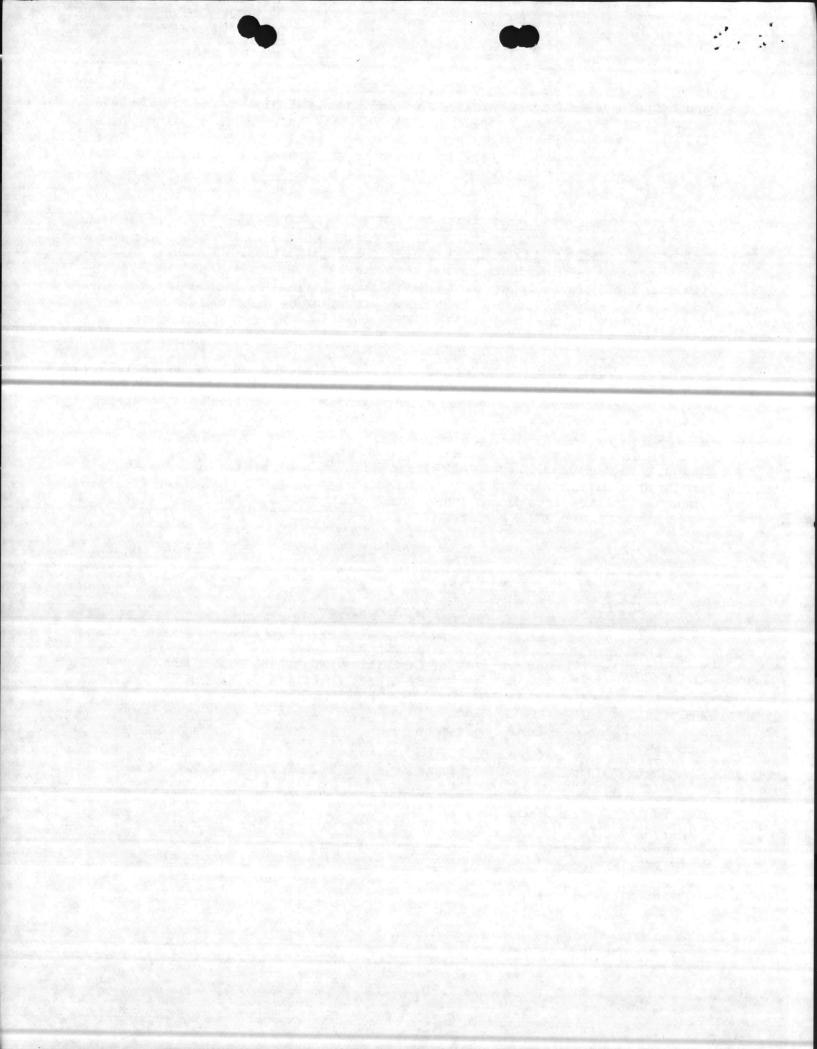
Sincerely yours,

J. G. DEMPSEY
Lieutenant Commander, CEC, USN
Acting Head
Facilities Management Department
By direction of the Commander

Copy to:
Solid and Hazardous Waste Management
Branch
306 North Wilmington Street
Raleigh, NC 27602

Division of Environmental Health Solid Waste Program 275 East Main Street Frankfort, KY

(Continued on Page 3)



JENNINGS LABORATORIES, INC.

TICAL AND CONSULTING CHE

1118 CYPRESS AVENUE • P. O. BOX 851 • VIRGINIA BEACH, VA. 23451 • PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

ASBESTOS ANALYSIS - NIOSH 582

Official Referee Chemists for: AMERICAN OIL CHEMISTS SOCIETY

NATIONAL SOYBEAN PROCESSORS ASSOCIATION Laboratory Certified by VA. STATE WATER
CONTROL BOARD for Analysis of
Effluents for NPDES PERMITS
CERTIFIED OFFICIAL U.S.D.A. LABORATORY
FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

Mr. Dave Goodwin
Building N-23 Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511

DATE: April 28, 1981

SAMPLE OF DRIED SLUDGE

MARKED Onslow Beach, Decomposed Bed #1 Camp Lejeune MCB taken 3/30/81 @ 1140 ho

Sample delivered by Mr. Wallmeyer 3/31/31

OFFICIAL SAMPLE BY:

E.P.TOXICITY METALS	AS IS	LEACHATE
Arsenic Barium Cadmium Chromium Lead Mercury Selenium Silver	<0.01 ppm 119.40 ppm 3.90 ppm 28.00 ppm 130.30 ppm 0.022 ppm 31.00 ppm 1.03 ppm	<pre><0.01 mg/l 0.33 mg/l 0.01 mg/l 0.08 mg/l 0.08 mg/l <0.002 mg/l <0.005 mg/l <0.005 mg/l</pre>
경험하다 그 그 그 그는 그 집에 가는 요즘데, 그는 것이 그를 하면 가게 되었다. 그는 그래요 그는 그림은 그렇게 그리고 있는데 그는 그리고 이 많은 아니다.		그리고 하나는 사람들 경에 많은 그리고 있다면 하는 것이 있다는 것이 없는 것이 되었다. 그리고 있는 것이 없는 것이 없는 것이 없는 것이 없는 것이 없다면 없는 것이 없다면 없는 것이다.

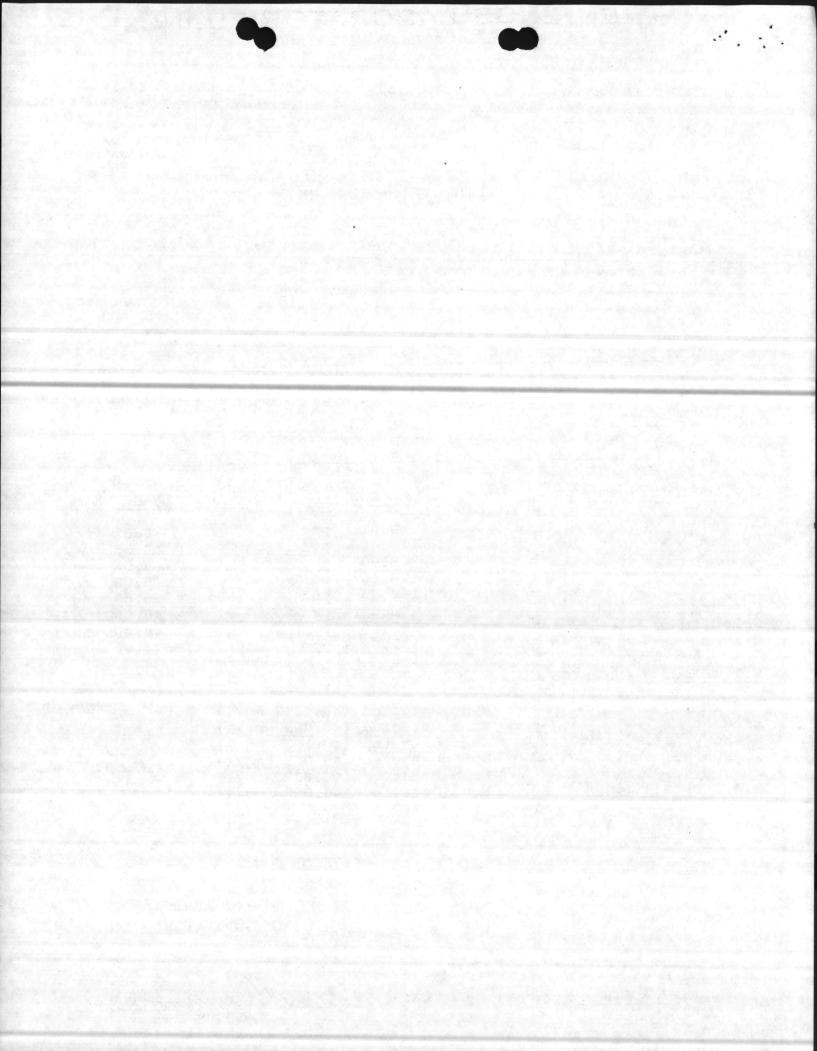
E.P. TOXICITY ORGANICS

Endrin	None Detected (<0.001 mg	/1)
Lindane	None Detected (<0.002 mg	
Methoxychlor	None Detected (<0.1 mg	
Toxaphene	None Detected (<0.002 mg	
2,4, D	None Detected (<0.002 mg	
2,4,5 TP Silvex	None Detected (<0.002 mg	
		8

Respectfully submitted,
JENNINGS LABORATORIES, INC.

Laboratory
Analysis No. 110

YN) H. Jannings Q.



JENNINGS LABORATORIES, INC.

YTICAL AND CONSULTING CHE

1118 CYPRESS AVENUE • P.O. BOX 851 • VIRGINIA BEACH, VA. 23451 • PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

ASBESTOS ANALYSIS - NIOSH 582

Official Referee Chemists for: AMERICAN OIL CHEMISTS SOCIETY

NATIONAL SOYBEAN PROCESSORS ASSOCIATION

Laboratory Certified by VA. STATE WATER CONTROL BOARD for Analysis of Effluents for NPDES PERMITS CERTIFIED OFFICIAL U.S.D.A. LABORATORY

FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

TO: Mr. Dave Goodwin Building N-23 Atlantic Division Naval Facilities Engineering Command Norfolk, Virginia 23511

April 28, 1981 DATE:

SAMPLE OF SLUDGE (Wet)

Rifle Range Decomposed, Bed #2 Camp Lejeune MCB N.C. taken 3/30/81 @

1045 hours. Samples delivered by Mr. Wallmeyer 3/31/81

OFFICIAL SAMPLE BY:

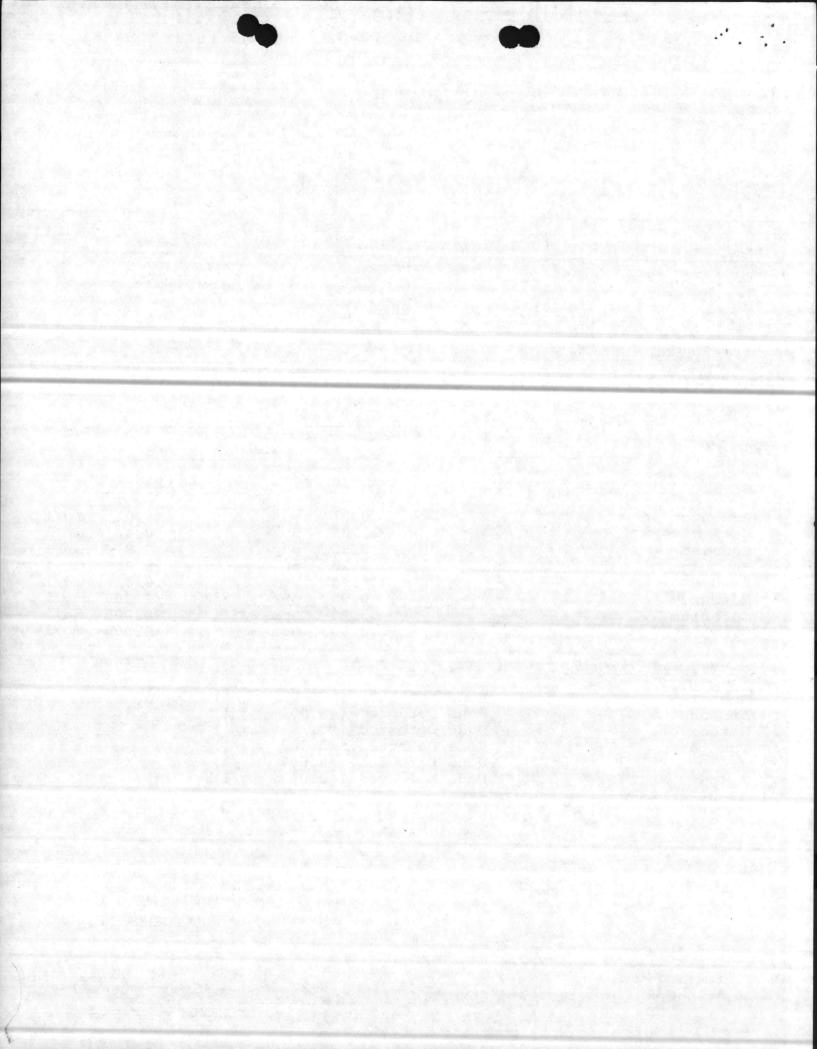
E.P.TOXICITY METALS	AS IS		LEACHATE	
Arsenic	<0.01	ppm	<0.01	mg/1
Barium	15.00	ppm	0.40	mg/1
Cadmium	0.60	ppm	0.01	mg/1
Chromium	4.20	ppm	0.06	mg/1
Lead	24.40	ppm	0.03	mg/l
Mercury	<0.002	ppm	<0.002	mg/1
Selenium	5.90	ppm	<0.005	mg/1
Silver	<0.005	ppm	<0.005	mg/1

E.P. TOXICITY ORGANICS

Endrin	None	Detected	(<0.001	mg/1)
Lindane	None	Detected	(<0.002	mg/1)
Methoxychlor	None	Detected	(<0.1	mg/1)
Toxaphene	None	Detected	1<0.002	mg/1)
2,4 D		Detected		mg/1)
2,4,5 TP Silvex		Detected		mg/1)

Respectfully submitted, JENNINGS LABORATORIES, INC.

Laboratory Analysis No. 111



JENNINGS LABORATORIES, INC.

AND TICAL AND CONSULTING CHEM

! 1118 CYPRESS AVENUE • P. O. BOX 851 • VIRGINIA BEACH, VA. 23451 • PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

ASBESTOS ANALYSIS - NIOSH 582

Official Referee Chemists for:

AMERICAN OIL CHEMISTS SOCIETY

NATIONAL SOYBEAN
PROCESSORS ASSOCIATION

Laboratory Certified by VA. STATE WATER
CONTROL BOARD for Analysis of
Effluents for NPDES PERMITS
CERTIFIED OFFICIAL U.S.D.A. LABORATORY
FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

TO: Mr. Dave Goodwin
Building N- 23 Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511

DATE: April 28, 1981

SAMPLE OF SLUDGE (Wet)

MARKED Hadnot Point, Decomposed Bed #2 Camp Lejeune, MCB, N.C. 3/30/81 @ 1300 hou

Sample delivered to laboratory 3/31/81 by Mr. Wallmeyer

OFFICIAL SAMPLE BY:

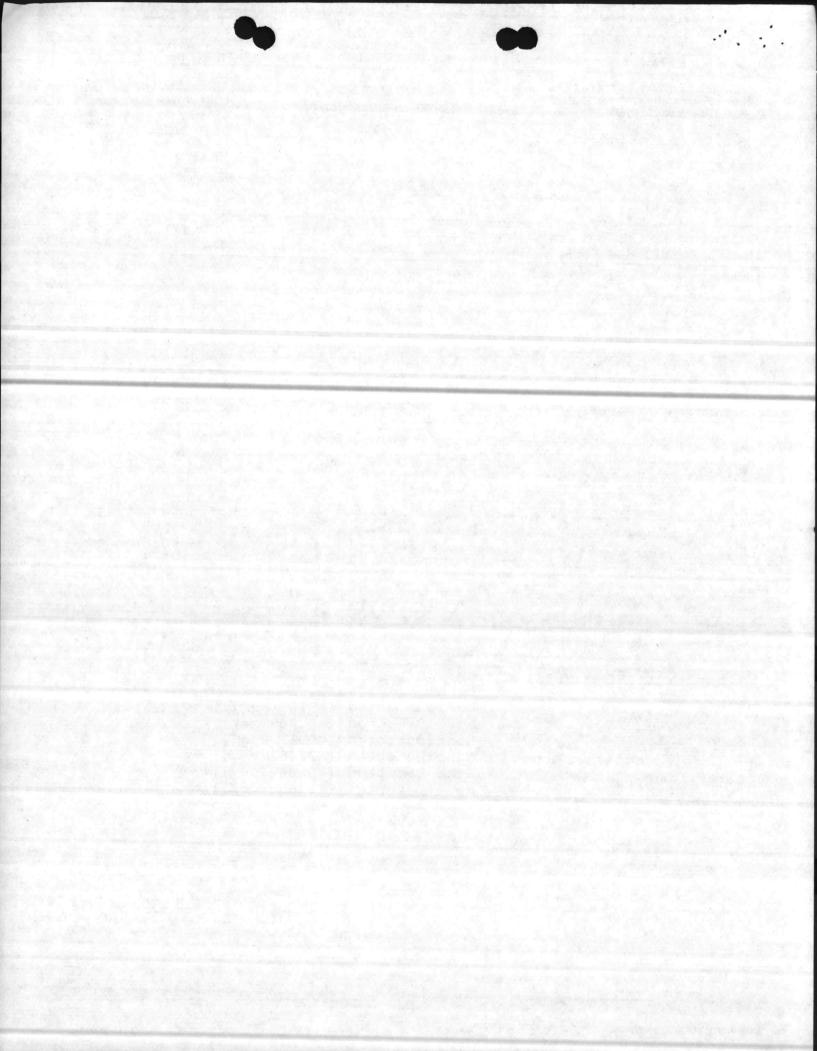
E.P. TOXICITY METALS	AS IS		LEACHATE
Arsenic	<0.01	ppm	<0.01 mg/l
Barium	266.30	ppm	0.07 mg/l
Cadmium	2.60	ppm	<0.005 mg/l
Chromium	14.20	ppm	0.10 mg/l
Lead	46.80	ppm	0.01 mg/1
Mercury	0.352	ppm	<0.002 mg/l
Selenium	11.10	ppm	0.52 mg/1
Silver	8,32	ppm	<0.005 mg/l

E.P. TOXICITY ORGANICS

Endrin	None	Detected	(<0.001	mg/1)
Lindane	None	Detected	(<0.002	mg/1)
Methoxychlor	None	Detected	(<0.1	mg/1)
Toxaphene	None	Detected	(<0.002	mg/1)
2,4, D	None	Detected	(<0.002	mg/1)
2,4,5, TP Silvex	None	Detected	(<0.002	mg/1)

Respectfully submitted,
JENNINGS LABORATORIES, INC.

Laboratory Analysis No. 112 41. H. Jenning



ANALYTICAL AND CONSULTING CHEMISTS

1118 CYPRESS AVEN R. O. BOX 851 · VIRGINIA BEACH, V 5-51 • PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

ASBESTOS ANALYSIS - NIOSH 582

Official Referee Chemists for: AMERICAN OIL CHEMISTS SOCIETY NATIONAL SOYBEAN PROCESSORS ASSOCIATION

Laboratory Certified by VA. STATE WATER CONTROL BOARD for Analysis of Effluents for NPDES PERMITS CERTIFIED OFFICIAL U.S.D.A. LABORATOR

FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

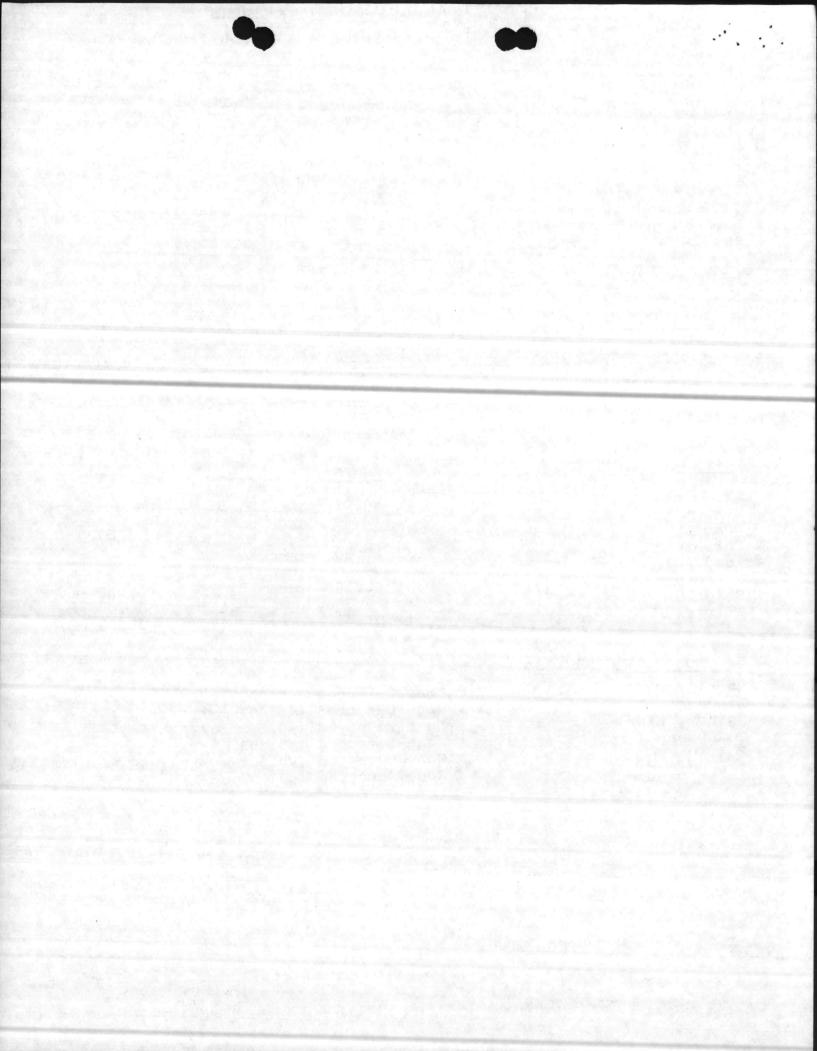
Mr. Dave Goodwin Building N-23 Atlantic Division Naval Facilities Engineering Command Norfolk, Virginia 23511

April 28, 1981

SAMPLE OF	SLUDGE (Dried)							
MARKED	Camp Johnson, Decomp	osed Bed	3 Camp Le	jeune M	CB N.C.	3/30/81	. @ 09:	.5
	Sample delivered to	laborator	y 3/31/81	by Mr.	Wallme	ver		
OFFICIAL S	SAMPLE BY:					V 1 1935		
E.P.	TOXICITY METALS		AS IS			LEACHAT	E	
Arse Bari Cadm Chro lead Merc Sele Silve	um ium mium ury nium		<0.01 112.90 4.70 17.90 109.40 0.150 26.30 1.68	ppm ppm ppm ppm ppm ppm		<0.01 0.09 0.01 0.08 0.07 <0.002 0.10 <0.005	mg/1	
Endri Linda Metho Toxar 2,4,	in ine Oxychlor Ohene	None None None	Detected Detected Detected Detected Detected Detected	(<0.002 (<0.1 (<0.002 (<0.002	mg/1) mg/1) mg/1) mg/1)			

Respectfully submitted, JENNINGS LABORATORIES, INC

Laboratory 113 Analysis No.



JENNINGS LABORATOPIES, INC.

LYTICAL AND CONSULTING COMSTS

1118 CYPRESS AVENUE • P. O. BOX 851 • VIRGINIA BEACH, VA. 23451 • PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

ASBESTOS ANALYSIS - NIOSH 582

Official Referee Chemists for:

AMERICAN OIL CHEMISTS SOCIETY

NATIONAL SOYBEAN

PROCESSORS ASSOCIATION

Laboratory Certified by VA. STATE WATER
CONTROL BOARD for Analysis of
Effluents for NPDES PERMITS
CERTIFIED OFFICIAL U.S.D.A. LABORATOR
FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

TO: Mr. Dave Goodwin
Building N-23 Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511

DATE: April 28, 1981

MARKED Courthouse Bay Bed #3 Camp Lejeune MCB N.C. 3/30/81 @ 1115 Hours

Delivered to laboratory 3/31/81 by Mr. Wallmeyer

OFFICIAL SAMPLE BY:

E.P.TOXICITY METALS	AS IS		LEACHATE	
Arsenic	<0.01	ppm	<0.01	mg/l
Barium	77.30	ppm	0.14	mg/l
Cadmium	1.02	ppm	0.01	mg/l
Chromium	23.50	ppm	 0.08	mg/1
Lead	79.80	ppm	0.11	mg/1
Mercury	0.115	ppm	<0.002	mg/1
Selenium	22.00	ppm	<0.005	mg/1.
Silver	0.99	ppm	<0.005	mg/1

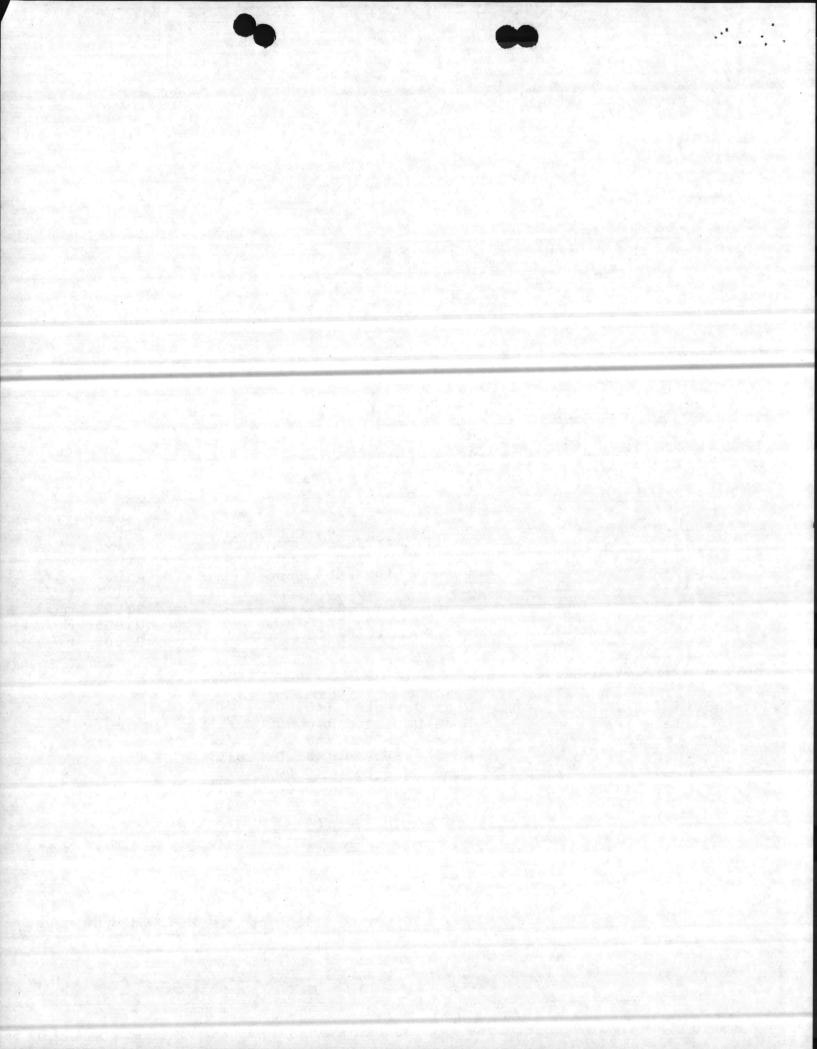
E.P. TOXICITY ORGANICS

Endrin	None	Detected	(<0.00I	mg/1)
Lindane	None	Detected	(<0.002	mg/1)
Methoxychlor	None	Detected	(<0.1	mg/1)
Toxaphene	None	Detected	(<0.002	mg/1)
2,4 D		Detected		
2,4,5 TP Silvex	None	Detected	(<0.002	mg/1)

Respectfully submitted,
JENNINGS LABORATORIES, INC.

Laboratory
Analysis No. 114

40. H. Dennings



LABORATORIES.INC ANALYTICAL AND CONSULTING C

1118 CYPRESS AVEN P. O. BOX 851 • VIRGINIA BEACH, VA. 23451 • PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

ASBESTOS ANALYSIS - NIOSH 582

Official Referee Chemists for: AMERICAN OIL CHEMISTS SOCIETY

> NATIONAL SOYBEAN PROCESSORS ASSOCIATION

Laboratory Certified by VA. STATE WATER CONTROL BOARD for Analysis of Effluents for NPDES PERMITS

CERTIFIED OFFICIAL U.S.D.A. LABORATOR FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

TO: Mr. Dave Goodwin Building N-23 Atlantic Division Naval Facilities Engineering Command Norfolk, Virginia 23511

DATE: April 28, 1981

BLUDGE (Dried)

Camp Geiger, Decomposed Bed #4 Camp Lejeune MCB N.C. 3/30/81 @ 1015 Hou

Sample delivered to laboratory 3/31/81 by Mr. Wallmeyer

OFFICIAL SAMPLE BY:

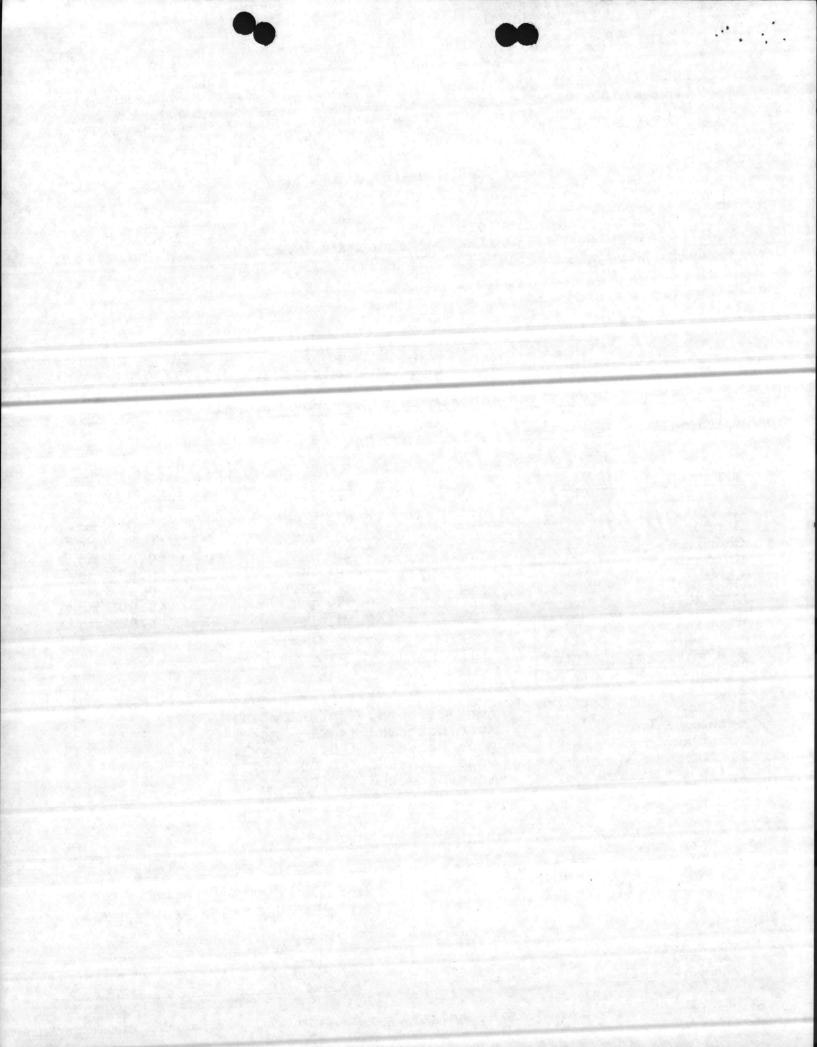
E.P. TOXICITY METALS	AS IS	LEACHATE
Arsenic Barium Cadmium Chromium Lead Mercury Selenium Silver	<0.01 ppm 62.80 ppm 4.0 ppm 24.60 ppm 33.60 ppm 0.620 ppm 21.10 ppm 0.35 ppm	<0.01 mg/l; 0.80 mg/l <0.005 mg/l 0.60 mg/l 0.40 mg/l <0.002 mg/l 1.90 mg/l <0.005 mg/l

E.P. TOXICITY ORGANICS

	그런 바다에 일본 경상에 다르게 되다면 하다.		
None	Detected	(<0 007	ma /11
Mono	Datas	1.0.OUT	1119/11
MOUS	Detected	(<0.002	mg/1)
None	Detected	(<0.1	ma /1)
Mana	Dalas	1.0.7	1113/11
Mous	petected	(<0.002	mq/1)
None	Detected	(<0 002	ma/11
N7	D	1.0.002	1119/1)
Mone	Detected	(<0.002	mg/1)
	None None None	None Detected None Detected None Detected None Detected	None Detected (<0.001 None Detected (<0.002 None Detected (<0.1 None Detected (<0.002 None Detected (<0.002 None Detected (<0.002

Respectfully submitted, JENNINGS LABORATORIES, INC

Laboratory Analysis No. 115



JENNINGS LABORATORIS, INC.

1118 CYPRESS AVENUE • P.O. BOX 851 • VIRGINIA BEACH, VA. 23451 • PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

ASBESTOS ANALYSIS - NIOSH 582

Official Referee Chemists for: AMERICAN OIL CHEMISTS SOCIETY

NATIONAL SOYBEAN PROCESSORS ASSOCIATION

Laboratory Certified by VA. STATE WATER
CONTROL BOARD for Analysis of
Effluents for NPDES PERMITS
CERTIFIED OFFICIAL U.S.P.A. LABORATORS

CERTIFIED OFFICIAL U.S.D.A. LABORATORY FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

To: Mr. Dave Goodwin
Building N-23 Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511

DATE: April 28, 1981

SAMPLE OF SLUDGE (Semi Dry)

MARKED Tarawa Terrace, Decomposed Bed #6 Camp Lejeune MCB, N.C. 3/30/81 @ 0945 h

Sample delivered to laboratory 3/31/81 by Mr. Wallmeyer

OFFICIAL SAMPLE BY:

E.P. TOXICITY METALS

AS IS

LEACHATE

Arsenic
Barium

0.021 ppm
85.20 ppm
85.20 ppm

	:			
Arsenic Barium		0.021	ppm	<0.01 mg/1
		85.20	ppm	0.11 mg/1
Cadmium	되다 있는 성급하게 하다셨습니다.	0.95	ppn	0.01 mg/1
Chromium	. 이렇게 생각하다 보다 보다 하다 하다.	26.90	ppm	
Lead		105.80	ppm	
Mercury		0.195	⁻	0.03 mg/l
Selenium .			ppm	<0.002 mg/1
Silver		22.30	ppm	<0.005 mg/l
DILVEL.		0.78	ppm	<0.005 mg/1

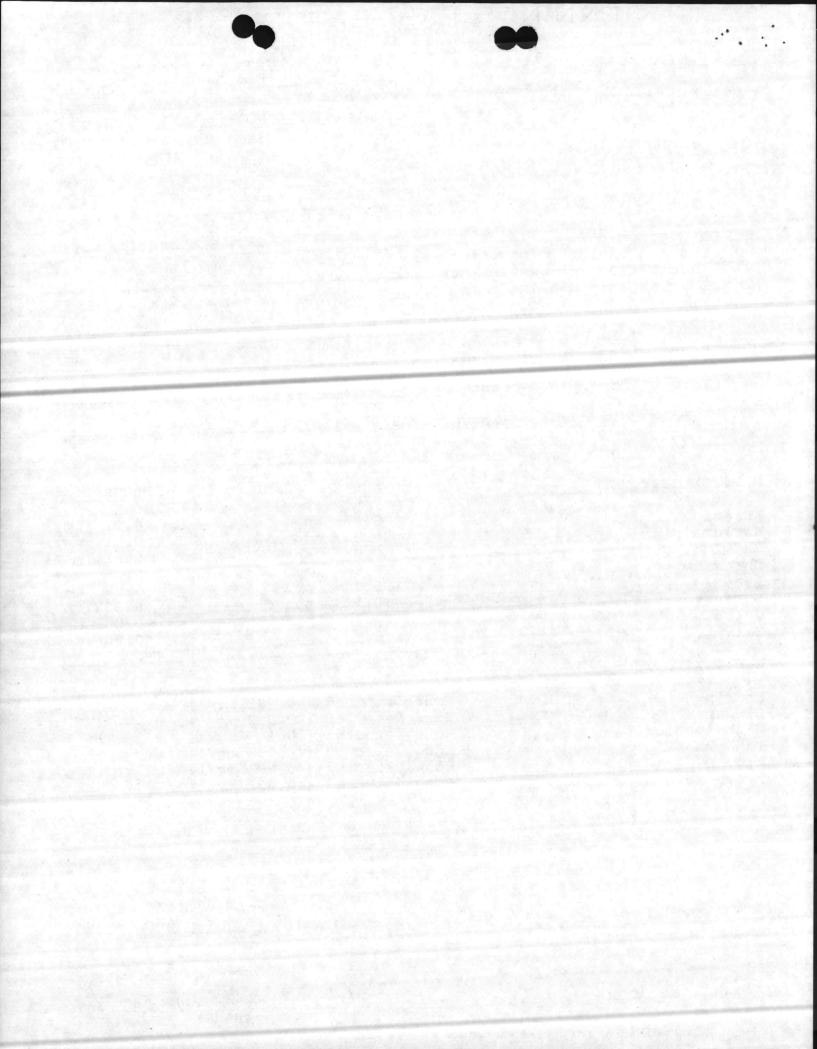
E.P. TOXICITY ORGANICS

Endrin	None	Detected	1/0 003	/2 \
Lindane	None	Detected	(<0.001	mg/1)
Methoxychlor	MOHE	Detected	(<0.002	mg/T)
그리에 그렇게 그리고 그래요. 그리고	None	Detected	(<0.1	mg/1)
Toxaphene	None	Detected	(<0.002	mq/1)
2,4, D	None	Detected	(<0.002	mg/1)
2,4,5 TP Silvex	None	Detected	(<0.002	mg/1)

Respectfully submitted,
JENNINGS LABORATORIES, INC.

Laboratory
Analysis No. 116

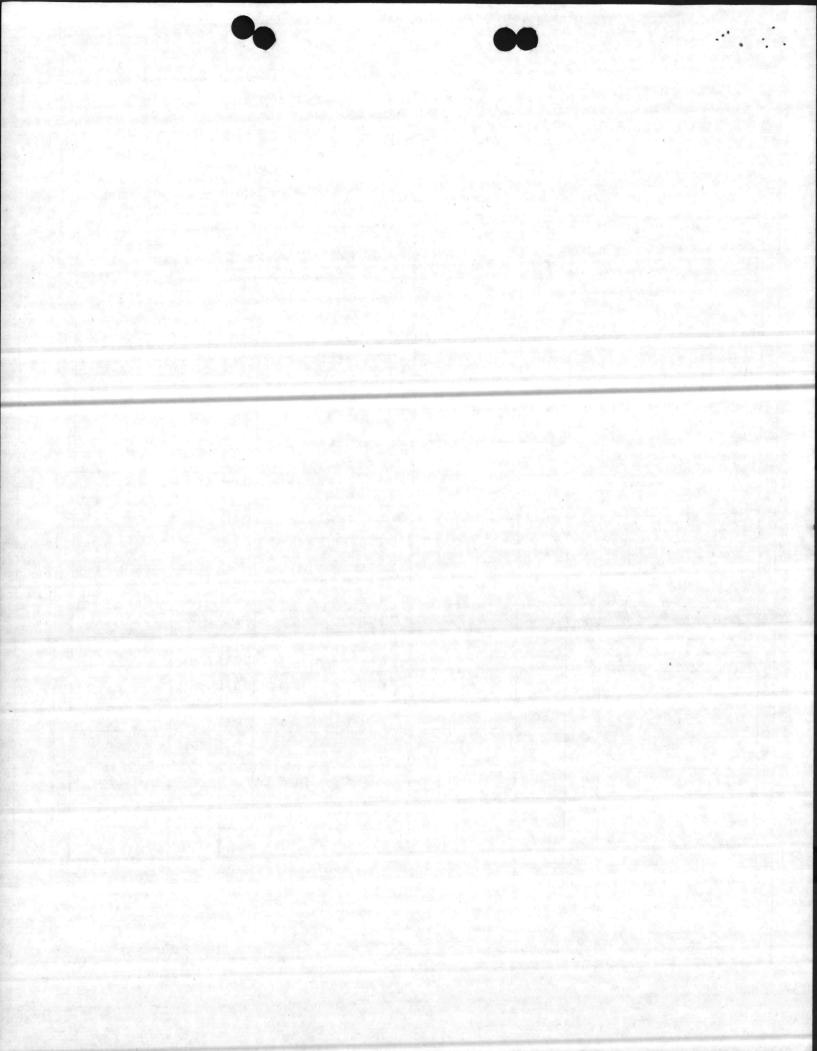
40, H. Janning &



UIC SAMPLE IDENTIFICATION SAVPI F SAMPLE. SAMPLE COLLECTION STATION COLLECTION 5ND LANTDIY 9-11330/3 (4-75) NUMBER MCB CAMP LEJEUNE #3 DRYING BED @ CAMP GEIGER STP DATE TIME BY BETZ & HUNEYCOTT SLUDGE 2 months old HIVON DAY 0.2400 12/21/81 JENNINGS LABORATORIES, INC. DATA PARAMETER DESCRIPTION UNITS VALUE VALUE PARAVETER DESCRIPTION UNITS ELEMENT ELEMENT NUMBER NUMBER TOTAL SUSPENCED SOLIDS ALUMINUM, TOTAL MG/ 01105 MG/L 00530 (NOV FILTERABLE RESIDUE) ARSENIC, TOTAL VIG/ TOTAL SOLIDS 46/L 00500 01002 (TOTAL RESIDUE 103-105°) ML! CADMIUM, TOTAL MG/L New 1 6 100 14 01027 SETTLEABLE SOLIDS. 00545 L/HR Alles a Carrier & (SETTLEABLE PESICUE) MG/L CHRCMIUM, TOTAL 01034 TOTAL DISSOL'ED SOLIDS 155/1 70300 (FILTERABLE RESIDUE) MG/L MG/L COPPER. TOTAL 01042 N-AVEONIA 00610 77. (AS A) MG/L MG/L IRON. TOTAL 01045 N-NITRATE TOTAL METALS 00520 (AS N) LEAD. TOTAL VG/L N-NITRITE TOTAL 01051 WG/L 00515 .HEAVY (AS Y) MAGNESHIM TOTAL MG/ TOTAL N (KJELDAHL) MG/ 00927 00525 ery mission MG/L MG /L MANGANESE, TOTAL 01055 ORTHOPHOSPIATE 00660 (AS POL) WERCURY, TOTAL NG/L 71900 TOTAL PHOSPHC-US MG/1 00678 (AS P) MG/L MG/L POTASSIUM, TOTAL 00937 SULFATE 00945 SILVER, TOTAL "G. 01077 PH LABORATORY 00403 ZINC. TOTAL MG/L 01092 MG/ 4. CHLORIDE 00940 TOTAL COLIFORM WFC/ 31503 TURBIDITY LAS ***0072** 100ML FTU FECAL COLIFORM 31616 NG/L CCE 00310 100AH MG L V:PN TOTAL COLIFORM 31506 00340 COD 100VL MPN / FECAL COLIFORM 31620 MG/L 00680 TOC 1004 < 0.005 MG/ Selenium (As Is) OU AND GREASE 70350 MG/L <0.005 Selenium (Leachate PHENOLS 32730 ONAL MG/L YBAS 38260 28 NO. 784 . 35 ADDIT MG.L CYANIDE 00720 1.41 "3250

> December 31,1981 \$100.00

12/29/81



JENNINGS LABORATORUS, INC.

1118 CYPRESS AVENUE • P. O. BOX 851 • VIRGINIA BEACH, VA. 23451 • PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

ASBESTOS ANALYSIS - NIOSH 582

Official Referee Chemists for: AMERICAN OIL CHEMISTS SOCIETY NATIONAL SOYBEAN PROCESSORS ASSOCIATION Laboratory Certified by VA. STATE WATER
CONTROL BOARD for Analysis of
Effluents for NPDES PERMITS
CERTIFIED OFFICIAL U.S.D.A. LABORATORY
FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

To: Mr. Dave Goodwin
Building N-23 Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511

DATE: April 24, 1981

SAMPLE OF SLUDGE

Cleaning Method #2

MARKED

MCAS CHERRY POINT N.C. DRYING BEDS taken 4/07/31 9 1000 hours

Sample delivered to laboratory 4/12/81 (iced)

OFFICIAL SAMPLE BY:

Mr. J. Floyd

E.P. TOXICITY METALS	AS IS	LEACHATE
Arsenic	<0.01 ppm	<0.01 mg/l
Barium	24.4 ppm	0.11 mg/1
Cadmium	32.9 ppm	0.03 mg/1
Chromium	785.0 ppm	- 0.05 mg/l
Lead	60.0 ppm	0.13 mg/1
Mercury	0.545 ppm	<0.002 mg/1
Selenium	33.60 ppm	0.18 mg/l
Silver	1.10 ppm	<0.005 mg/l

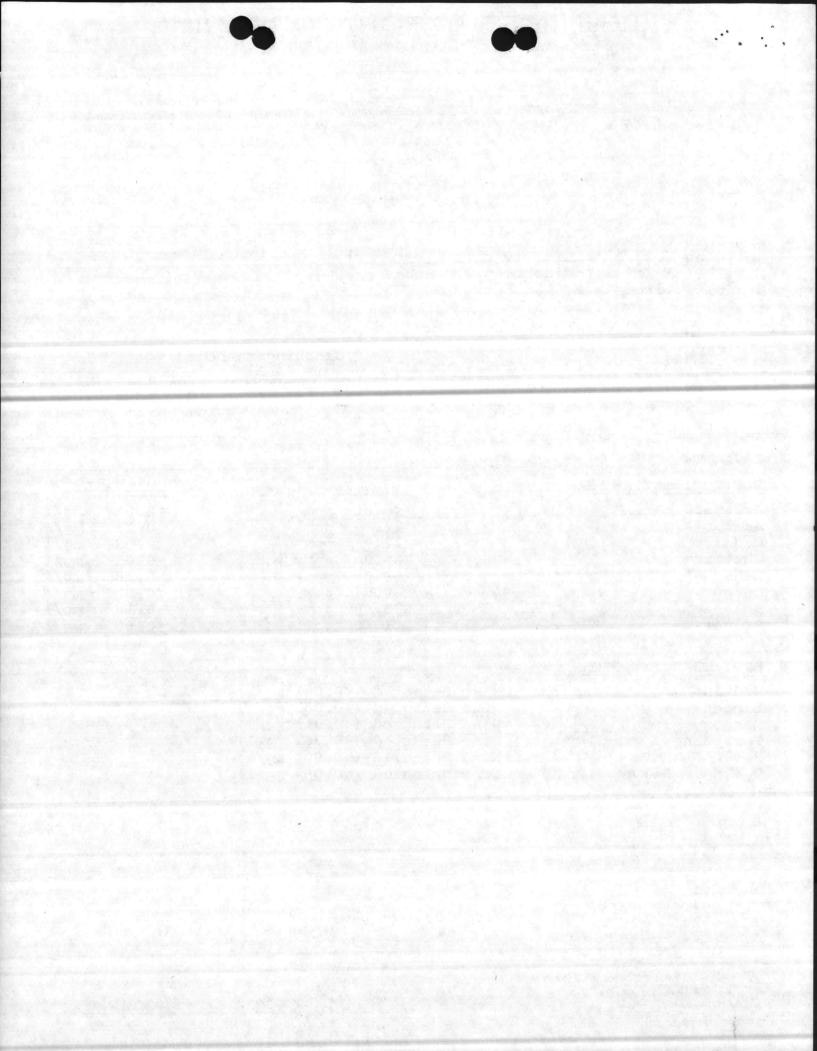
E?P. TOXICITY ORGANICS

Endrin	None	Detected	(<0.001	mg/1)
Lindane	None	Detected	(<0.002	mg/1)
Methoxychlor	None	Detected	(<0.01	mg/1)
Toxaphene	None	Detected	(<0.002	mg/1)
2,4,D	None	Detected	(<0.002	mg/1)
2,4,5 TP Silvex	None	Detected	(<0.002	mg/1)

Respectfully submitted,
JENNINGS LABORATORIES, INC.

Analysis No. 147

EHEMIST DE CHEMIST



JENNINGS LABORATORES, INC. TICAL AND CONSULTING CHEMI

1118 CYPRESS AVENUE • P. O. BOX 851 • VIRGINIA BEACH, VA. 23451 • PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

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Official Referee Chemists for: AMERICAN OIL CHEMISTS SOCIETY NATIONAL SOYBEAN PROCESSORS ASSOCIATION

Laboratory Certified by VA. STATE WATER CONTROL BOARD for Analysis of Effluents for NPDES PERMITS CERTIFIED OFFICIAL U.S.D.A. LABORATORY

FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

TO: Mr. Dave Goodwin

Building N-23 Atlantic Division Naval Facilities Engineering Command Norfolk, Virginia 23511

DATE: April 24, 1981

SAMPLE OF

SLUDGE/WATER

Cleaning Method #2

MARKED

MCOLF-ATLANTIC, N.C. AEROBIC DIGESTION PONUS taken 4/6/81 @ 1330 hours

Sample delivered to laboratory 4/12/81

OFFICIAL SAMPLE BY:

M. Chapman

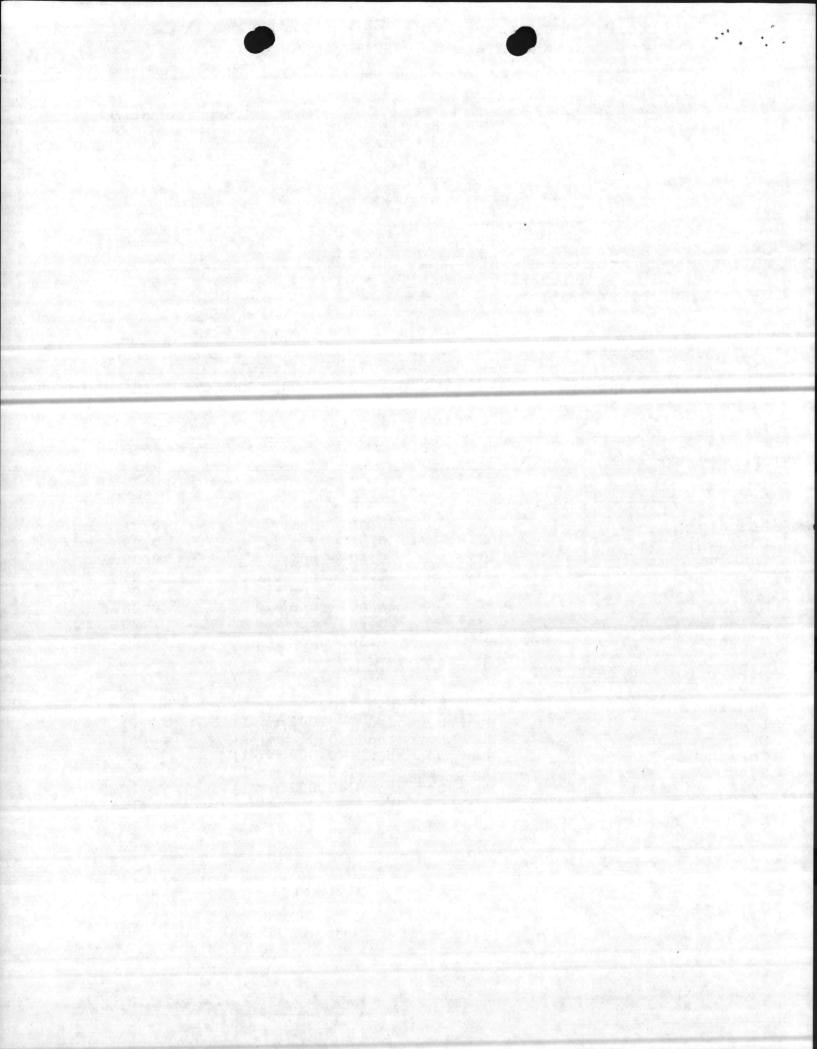
E.P.TOXICITY METALS	AS IS		<u>LEACHATE</u>		
Arsenic Barium Cadmium Chromium Lead Mercury	<0.01 0.54 0.40 1.40 8.80 <0.002	ppm ppm ppm ppm ppm	<0.01 0.09 <0.005 0.04 0.08 <0.002	mg/l mg/l mg/l mg/l mg/l mg/l	
Selenium Silver	28.90 0.30	ppm	<0.005	mg/l mg/l	

E.P. TOXICITY ORGANICS

[2] "H. H. H				
Endrin	None	Detected	(<0.001	mg/1)
Lindane	None	Detected	(<0.002	mg/1)
Methoxychlor	None	Detected	(<0.01	mg/1)
Toxaphene	None	Detected	(<0.002	mg/1)
2,4,D	None	Detected	(<0.002	mg/1)
2,4,5 TP Silvex		Detected		
트리션 마이 다음 :				

Respectfully submitted, JENNINGS LABORATORIES, INC.

Laboratory 148 Analysis No.



LABORATORY M

KAYY ENVIRONMENTAL PROTECTION SUPPORT SERVICE 11ND-C3C-39CO/2 (REV. 10-74) 09CC-LL-M90-CG22

UIC SAMPLE IDENTIFICATION SAMPLE COLLECTION TIME SAMPLE SAMPLE COLLECTION STATION NUMBER DATE

MCAS CHERRY POINT "ATLANTIC FIELD #1 & #3 composited DAY YEAR 0-2-00

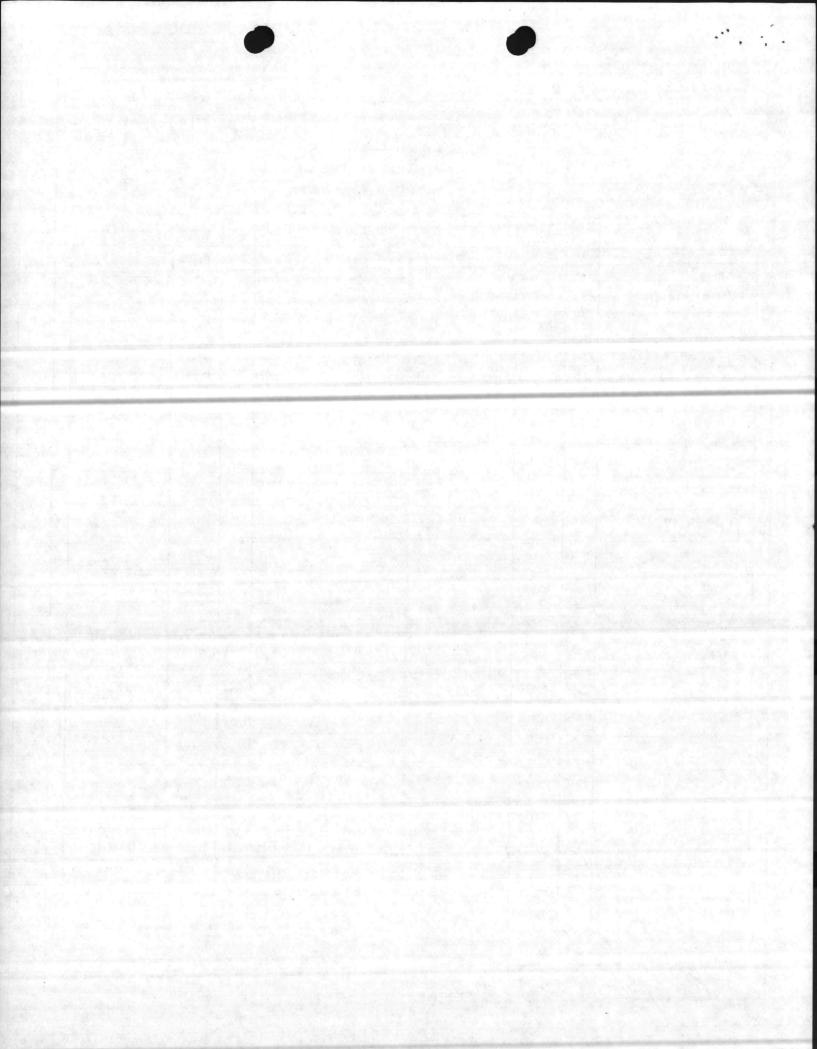
F441-41384 VANE

P	ARAMETER DESCRIPTION	UNITS	DATA ELEMENT NUMBER	VALUE	PARAMETER DESCRIPTION	UNITS	DATA ELEMENT NUMBER	VALUE							
T	TOTAL SUSPENDED SOLIDS (NON FILTERABLE RESIDUE)	MG/L	00530		ALLWINUM, TOTAL	MG/L	01105								
501.	TOTAL SOLIDS (TOTAL RESIDUE 103-105°)	MG/L	00500		ARSENIC, TOTAL	MG/L	01002	e gradienica.							
750	SETTLEABLE SOLIDS (SETTLEABLE RESIDUE)	ML/ L/HR	00545		CADMIUM, TOTAL	MG/L	01027								
-	TOTAL DISSOLVED SOLIDS (FILTERABLE RESIDUE)	MG/L	70300		CHROWIUM, TOTAL	MG/L	01034								
	N-AVMONIA (AS N)	MG/L	00610		COPPER, TOTAL	MG/L	01042								
	N-NITRATE TOTAL	MS/L	00620		IRON, TOTAL	MG/L	01045		1						
,	N-NITRITE TOTAL (AS N)	MG/L	00615		LEAD, TOTAL	MG/L	01051								
NUTRIENT	TOTAL N (KJELDAHL)	MG/L	00625		MAGNESIUM, TOTAL	MG/F	00927								
N	CRTHOPHOSPHATE (AS PO ₄)	MG/L	00660		MANGANESE, TOTAL	MG/L	01055								
	TOTAL PHOSPHORUS	MG/L	00678		MERCURY, TOTAL	MG/L	71900								
	SULFATE	MG/L	00945		POŢASSIUM. TOTAL	MG/L	00937								
1	PH LABORATCRY		00403			. SILVER, TOTAL	MG/L	01077							
	CHLOR 1DE	MG/L	00940		ZINC, TOTAL	MG/L	01092	430.							
TER	EA1 YTIGIERUT	JTU/ FTU	w0072		TOTAL COLIFORM	MFC/	31503								
PARAMETER	BOD	MG/L	00310		FECAL COLIFORM	MFC/	31616								
	COD	MG/L	/L 00340 TOTAL COLIFORM MPN/ 31			TOTAL COLIFORM	FECAL COLIFORN								
EGORIZED	тос	MG/L	00680	FECAL COLIFORN	00680 FECAL COLIFORN MPN/ 100ML 316	FECAL COLIFORN				1					
NON-CATE	OIL AND GREASE	MG/L	70350		Selenium (as Is		ppm	0.01							
ON	PHENOLS	MG/L	32730		Selenium(Leach	ate)	ppm	<0.005							
	MBAS	MG/L	38260												
	CYANIDE	MG/L	00720					14.75							

49101

31 .4476 98 1/19/82

January 28,1982



JENNINGS LABORATORIES, INC.

TICAL AND CONSULTING CHEM

1118 CYPRESS AVENUE • P. O. BOX 851 • VIRGINIA BEACH, VA. 23451 • PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

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Laboratory Certified by VA. STATE WATER
CONTROL BOARD for Analysis of
Effluents for NPDES PERMITS
CERTIFIED OFFICIAL U.S.D.A. LABORATORY
FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

To: Mr. Dave Goodwin
Building N-23 Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511

DATE: April 27, 1981

SAMPLE OF SLUDGE/WATER SAMPLE

Part of the second of the seco

MCALF, BOGUE, N.C. AEROBIC DIGESTION PONDS 4/6/81 @ 0800

Sample delivered 4/12/81 by Mr. Wallmeyer.

OFFICIAL SAMPLE BY:

MARKED.

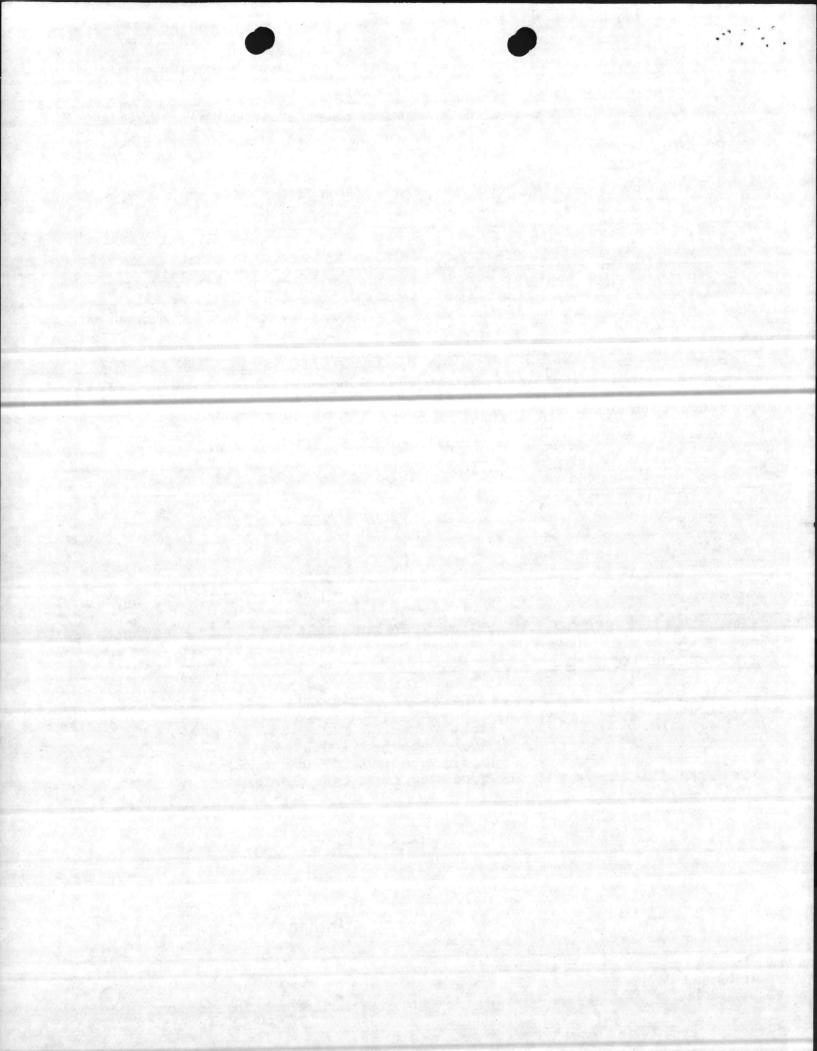
E.P.TOXICITY METALS	AS IS		LEACHATE		
Arsenic Barium Cadmium Chromium Lead Mercury Selenium Silver	6.50 0.20 0.50 19.60 <0.002 20.8	ppm ppm ppm ppm ppm	<pre><0.01 mg/1 0.03 mg/1 0.01 mg/1 0.01 mg/1 0.22 mg/1 <0.002 mg/1 1.52 mg/1 <0.005 mg/1</pre>		

E.P. TOXICITY ORGANICS

그리고 있다면 하면 하면 하면 하면 하면 되었다. 그런 이 이 사람들은 사람들은 사람들은 사람들이 되었다면 하는데				
Endrin	None	Detected	(<0.001	ma/1)
Lindane	None	Detected	(<0.002	mg/1)
Methoxychlor	None	Detected	(<0.1	mg/1)
Toxaphene	None	Detected	(<0.002	mg/1)
2,4,D		Detected		
2,4,5 TP Silvex	None	Detected	(<0.002	mg/1)

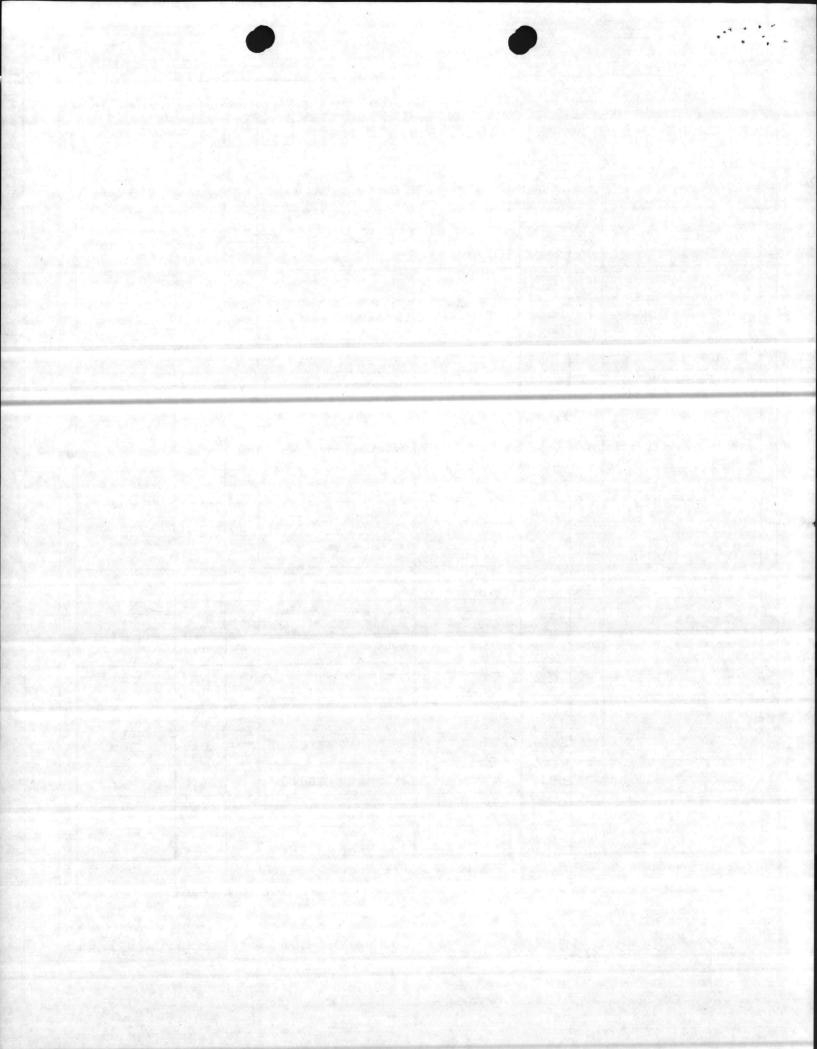
Respectfully submitted,
JENNINGS LABORATORIES, INC.

Laboratory Analysis No. 149 W. H. Janning)



LABORATORY MULTIPLE PARAMETER WATER QUALITY ANALYSIS RECORD

WAYY ENVIRONMENTAL PROTECTION SUPPORT SERVICE 1190-030-3900/2 (REV. 10-74) 0500-LL-M90-0022 UIC SAMPLE IDENTIFICATION SAMPLE SAMPLE SAMPLE COLLECTION COLLECTION STATION DATE TIME NIMBER MCAS CHERRY POINT BOGUE FIELD #1 & #2 Compositedovin DAY JENNINGS LABORATORIES, INC. PARAMETER DESCRIPTION WITS VALUE PARAMETER DESCRIPTION LNITS ELEMENT VALUE FLEMENT NUVBER NUMBER TOTAL SUSPENDED SOLIDS MG/L MG/L 00530 ALUMINUM, TOTAL 01105 (NON FILTERABLE RESIDUE) TOTAL SOLIDS MS/L ARSENIC, TOTAL MG/L 00500 01002 (TOTAL RESIDUE 103-105°) ML/ SETTLEAGLE SCLIDS CADMIUM, TOTAL 00545 MG/L L/HR 01027 (SETTLEABLE RESIDUE) TOTAL DISSOLVED SOLIDS WG/ 70300 CHROMIUM TOTAL MG/, 01034 (FILTERABLE RESIDUE) ALKOWA-N MG/L COPPER, TOTAL MG/L 00510 01042 (AS N) N-NITRATE TOTAL 15/ IRON. TOTAL MG/L 00520 01045 (A5 N) N-NITRITE TOTAL WS/L LEAD. TOTAL 00615 MG/L 01051 (AS N) TOTAL N (KJELDAHL) 15/ MAGNESIUM, TOTAL 00625 MG/L 00927 ORTHOPHOSPHATE 155/L MANGANESE, TOTAL MG/ 00650 01055 (AS POA) TOTAL PHOSPHCRUS MG/ MERCURY, TOTAL 00578 MG/L 71900 (AS P) SULFATE 35/L MG/L POTASSIUM, TOTAL 00945 00937 PH LABORATORY SILVER, TOTAL 00403 MG/ 01077 CHLORIDE MG/L ZINC, TOTAL NG/L 00940 01092 TURBIDITY LAB JTU/ MFC/ M0072 TOTAL COLIFORM 31503 BOD MG/ FECAL COLIFORM NFC/ 00310 FORM 31616 MPN/ COL -CATEGORIZED CCD WG/L TOTAL COLIFORM 00340 31506 TOC MG/L 00630 FECAL COLIFORM MPN 31620 1000 OIL AND GREASE SS/L PARAMETERS 70350 0.007 Selenium (AsIs) X ppm PHENOLS MS/L 32730 Selenium (Leachate) <0.005 ppm ADDITIONAL YBAS MG/L 38250 CYANIDE 15/L 00720 *3561 SIGNATUR January 28,1982 \$100.00



ANALYTICAL AND CONSULTING CHEMISTS

1118 CYPRESS AVENUE . I BOX

BOX 851 - VIRGINIA BEACH, VA. 234

PHONE (804) 425-1498

VA (EPA) CERTIFIED LABORATORY for Drinking Water Analysis - Microbiological, Inorganic and Organic

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Official Referee Chemists for: AMERICAN OIL CHEMISTS SOCIETY NATIONAL SOYBEAN PROCESSORS ASSOCIATION Laboratory Certified by VA. STATE WATER
CONTROL BOARD for Analysis of
Effluents for NPDES PERMITS
CERTIFIED OFFICIAL U.S.D.A. LABORATORY
FOR MEAT ANALYSIS

CERTIFICATE OF ANALYSIS

Mr. Dave Goodwin

Building N-23 Atlantic Division

Naval Facilities Engineering Command

Norfolk, Virginia 23511

DATE: May 20, 1981

CA1434 E OE

SEWAGE WASTE (Bottom Sludge before Sand filter)

SAMPLE OF

Taken from NAVFAC CAPE HATTERAS BUXTON, N.C. 27920

MARKED

Sample delivered to laboratory 5/08/81

OFFICIAL SAMPLE BY:

UT-1 Pete J. Raif

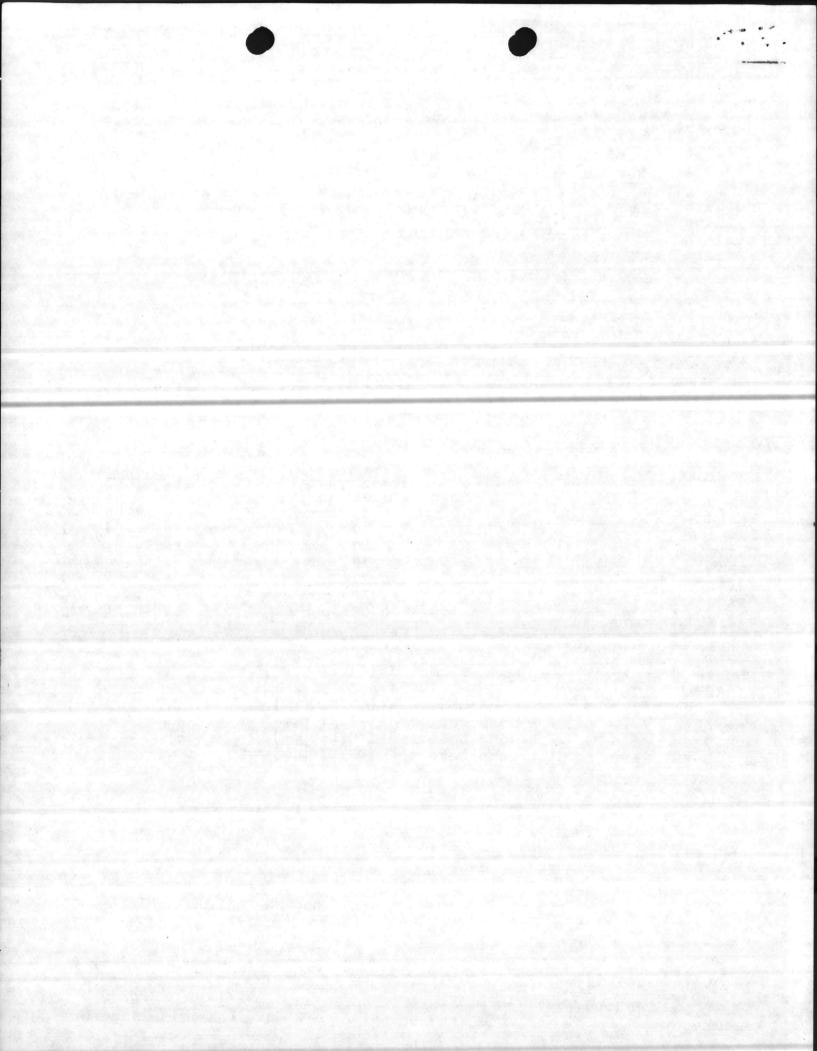
TE
mg/l mg/l mg/l mg/l 5 mg/l 2 mg/l mg/l

E.P. TOXICITY ORGANICS

Endrin	None	Detected	(<0.01	ppm)
Lindane		0.04	ppm	
Methoxychlor	None	Detected	(<0.01	ppm)
Toxaphene	None	Detected	(<0.01	ppm)
2,4,D		Detected		
2,4,5 TP Silvex		Detected		
		programme and the second		

Respectfully submitted,
JENNINGS LABORATORIES, INC.

Navy Laboratory Analysis No. 201 \$460.00 W. K. Denning g.



114:DPG 6280

18 AUG 1980

CERTIFIED MAIL RETURN RECEIPT REQUESTED

U.S Environmental Protection Agency Region IV RCRA Activities 345 Courtland Street, N.E. Atlanta, GA 30308

Centlemen:

Hazardous Waste Notifications are herein forwarded for the following activities:

- a. Maval Ordnance Station, Louisville, Kentucky.
- b. Marine Corps Base, Camp Lejeune, North Carolina. This activity notification is being filed directly and is not attached to this letter.
 - c. Marine Corps Air Station, New River, North Carolina.
- d. Marine Corps Air Station, Cherry Point, North Carolina (including Naval Air Rework Facility, Cherry Point; Narine Corps Auxiliary Field, Bogue; Marine Corps Cutlying Field, Atlantic; Bluethental Field New Hanover Municipal Airport, Wilmington, North Carolina; Pamilco Target Area; Brant Island Target Area; MAW Point Target Area; and Cat Island Target Area).

Please note that also herein forwarded is a summary of the Hazardous Waste Notifications, including the required general descriptions and locations.

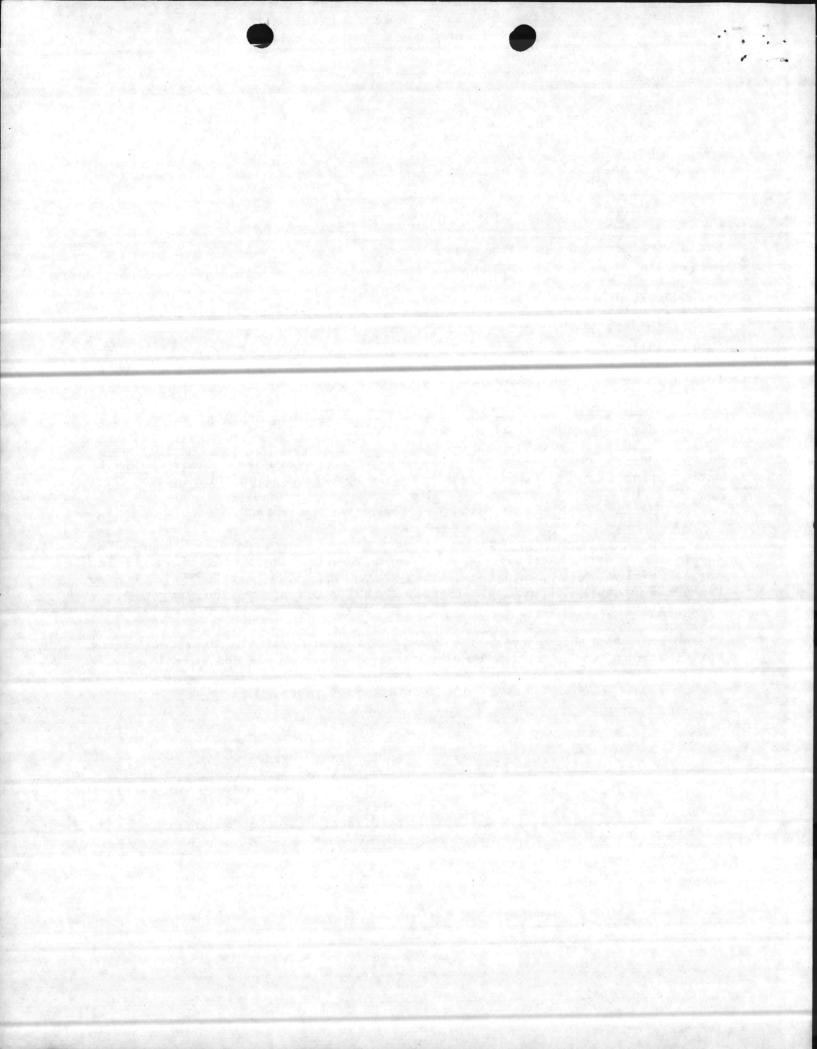
Sincerely yours,

ANDRES TALTS, P.E.
Head, Environmental Quality Branch
Utilities, Energy and Environmental
Division
By direction of the Commander

Enclosures

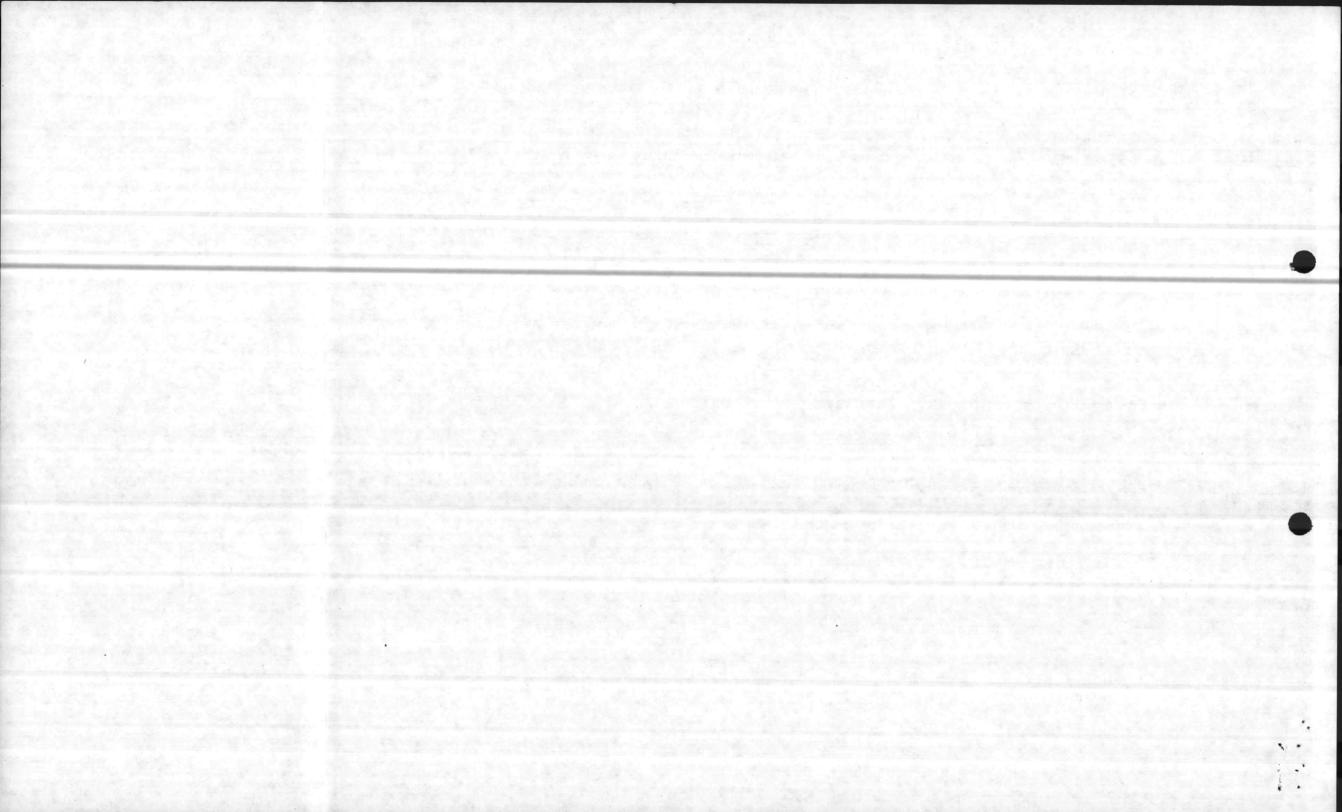
GOODWIN Brite 8/18.80





EPA REGION IV HAZARDOUS WASTE NOTIFICATION SUMMARY

Activity	General Description	Location	Generator	Storer	Treater	Disposer	Transporter	Remarks
Naval Ordnance Station, Louisville	Ordnance/equipment storage/handling/ repair (including plating)	Louisville, Kentucky	Yes	Yes	Yes	No	No	Treatment consists of an Industrial Wastewater Treatment Plant.
Marine Corps Base, Camp Lejeune	Weapons training, fuel/supplies/ ordnance storage/ handling (fuel tanks/warehouses/ magazines)	Jacksonville, North Carolina	Yes	Yes	No	No	Yes	Transport consists of transport to Marine Corps Air Station, Cherry Point.
Marine Corps Air Station, New River	Air station, air- craft (minor) repair	Jacksonville, North Carolina	Yes	No	No	No	Yes	Temporary storage only. Tenant of Marine Corps Base, Camp Lejeune. Trans- port to Camp Lejeune.
Marine Corps Air Station, Cherry nt	Air station, air- craft repair (including plating)	Havelock, North Carolina	Yes	Yes	Yes	Yes	•	Transport may consist of transport from outlying facilities to Marine Corps Air Station, Cherry Point. Treatment consists of an Industrial Wastewater Treatment Plant and (planned) solvent distillation. Disposal consists of the Industrial Wastewater Treatment Plant sludge disposal.

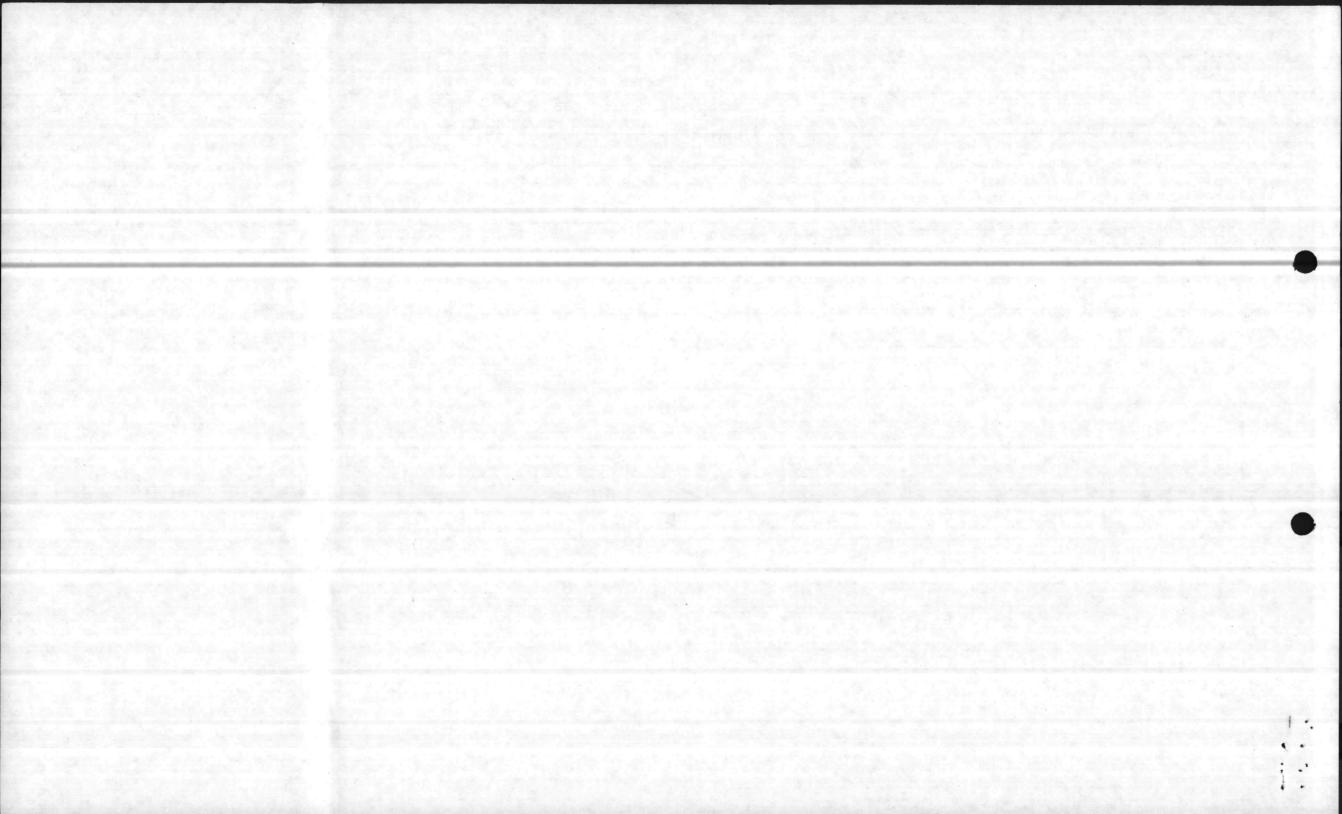


	<u> Activity</u>	Description	Location	Generator	Storer	Treater	Disposer	Transporter	Remarks
5.	Naval Facility, Cape Hatteras	Collect oceano- graphic data	Cape Hatteras, North Carolina	No	No	No	No	No	

(1) No underground injection of hazardous waste.

(2) Temporary storage only (awaiting contract disposal) for all of the above activities and their outlying facilities except for the "disposal" (permanent storage) site list from Marine Corps Air Station, Cherry Point.

(3) There are Defense Property Disposal Offices (DPDOs) located at Marine Corps Air Station, Cherry Point; Marine Corps Base, Camp Lejeune; and Naval Ordnance Station, Louisville. The Hazardous Waste Notifications will be forwarded via separate correspondence since DPDOs are Department of Defense activities (i.e. not in the USN chain of command). Please be advised that the DPDOs have recently been directed to dispose of hazardous wastes for all of the armed services. Point of contact for DPDOs is Defense Logistics Agency, Cameron Station, Alexandria, VA 22314 (202-274-7503).



114:DPG 6280

18 AUG 1980

CERTIFIED MAIL RETURN RECEIPT REQUESTED

U.S Environmental Protection Agency Region IV RCRA Activities 345 Courtland Street, N.E. Atlanta, GA 30308

Centlemen:

Hazardous Waste Notifications are herein forwarded for the following activities:

- a. Naval Ordnance Station, Louisville, Kentucky.
- b. Marine Corps Base, Camp Lejenne, North Carolina. This activity notification is being filed directly and is not attached to this letter.
 - c. Marine Corps Air Station, New River, North Carolina.
- d. Marine Corps Air Station, Cherry Point, North Carolina (including Naval Air Rework Facility, Cherry Point; Marine Corps Auxiliary Field, Bogue; Marine Corps Cutlying Field, Atlantic; Bluethental Field New Hanover Municipal Airport, Wilmington, North Carolina; Pamilco Target Area; Brant Island Target Area; MAW Point Target Area; and Cat Island Target Area).

Please note that also herein forwarded is a summary of the Hazardous Waste Motifications, including the required general descriptions and locations.

Sincerely yours,

ANDRES TALTS, P.E.
Head, Environmental Quality Branch
Etilities, Energy and Environmental
Division
By direction of the Commander

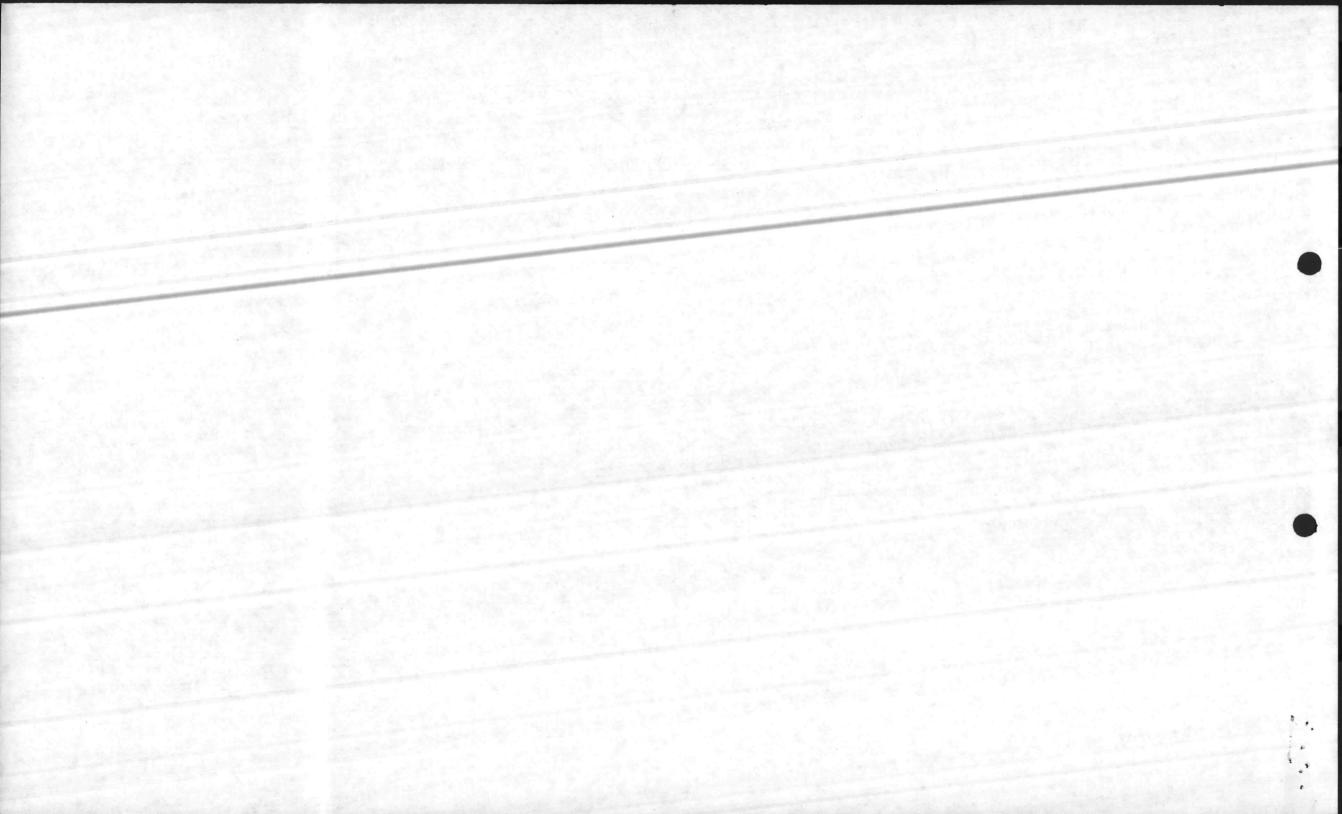
Enclosures

GOODWIN Brite 8/18.80



EPA REGION IV HAZARDOUS WASTE NOTIFICATION SUMMARY

Activity	General Description	Location	Generator	Storer	Treater	Disposer	Transporter	Remarks
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Marine Corps A Station, Cherr int		Havelock, North Carolina	Yes	Yes	Yes	Yes	?	Transport may consist of transport from outlying facilities to Marine Corps Air Station, Cherry Point. Treatment consists of an Industrial Wastewater Treatment Plant and (planned) solvent distillation. Disposal consists of the Industrial Wastewater Treatment Plant sludge disposal.



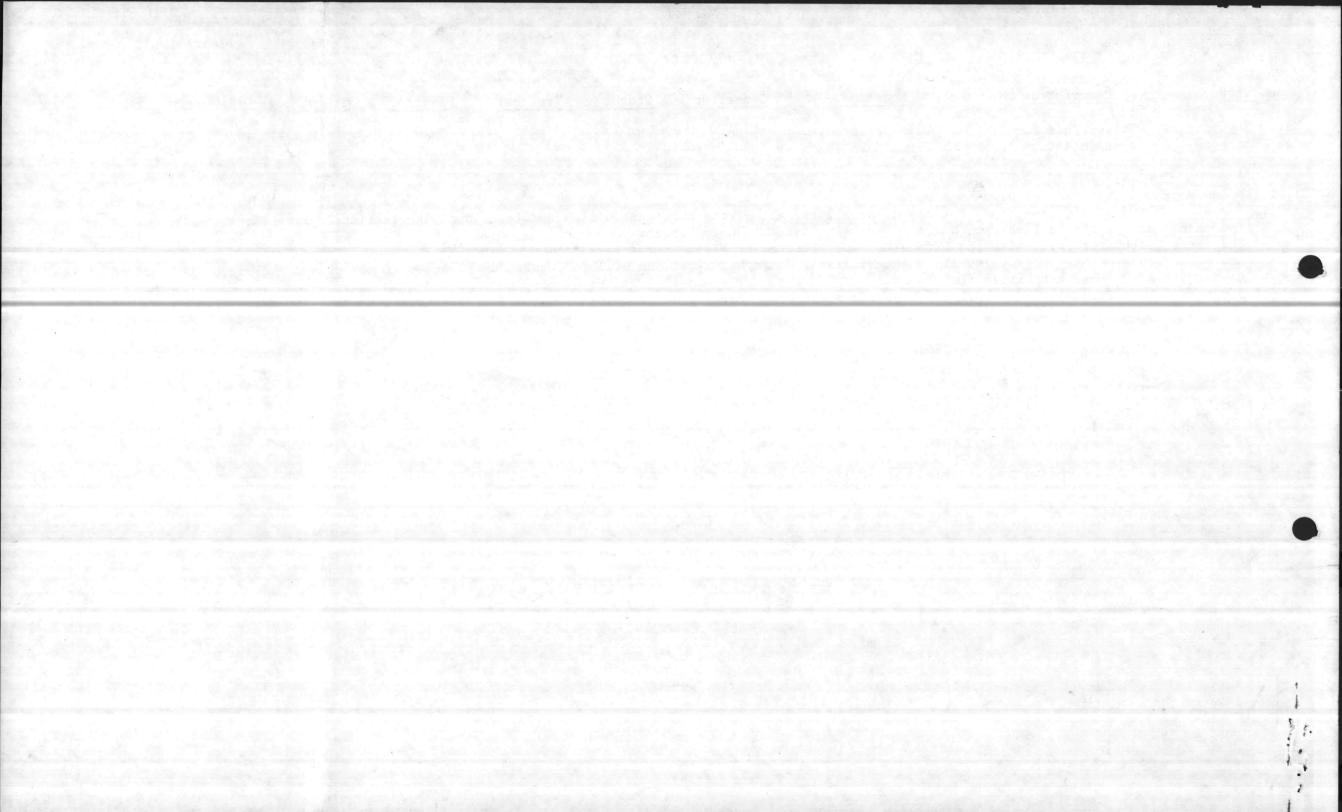
	<u> Activity</u>	General Description	Location	Generator	Storer	Treater	Disposer	Transporter	Remarks
5.	Naval Facility, Cape Hatteras	Collect oceano- graphic data	Cape Hatteras, North Carolina	No	No	No	No	No	-

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(permanent storage) site list from Marine Corps Air Station, Cherry Point.

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Main

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SUBJ: COMPLIANCE WITH STATE/FEDERAL HAZARDOUS WASTE (HW)	Secretary
REGULATIONS	
A. DIV OF HEALTH SERVICES LTR OF 3 JUN 82 (NOTAL)	Aurora de la la
B. CG MCB MSG 042 133Z DEC 81	
1. REF A ADVISED THIS COMMAND THAT A FOLLOW-UP INSPECTION TO THE	
13 OCT 1981 INSPECTION WOULD BE CONDUCTED TO INSURE COMPLIANCE WIT	ГН
SUBJECT REGULATIONS AND TO ASCERTAIN STATUS OF CORRECTIVE ACTION	ΓΟ

*PAGE 02 RUEBDOA 8352 UNCLAS
AND OTHER HW HAVE BEEN IMPLEMENTED.

3. THIS IS TO ADVISE THAT THE INSPECTION TEAM MAY DESIRE TO VISIT SHOPS OR WORKSITES IN ANY OF THE ADDRESSEES AREAS. QUESTIONS REGARDING THIS MATTER SHOULD BE DIRECTED TO MR. D. SHARPE, NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS BRANCH, BASE MAINTENANCE DIVISION, TELEPHONE 451-2083.

BT #8352

RECTIFY DISCREPENCIES NOTED DURING THE 13 OCT INSPECTION.

2. ADDRESSES ARE REQUESTED TO INSURE THAT ACTIONS RECOMMENDED IN PAR 4 OF REF A RELATIVE TO WEEKLY INSPECTIONS OF SHOPS AND

WORKSITES ROUTINELY HANDLING OR STORING USED SOLVENTS, BATTERY ACID

REL; K.P. MILLICE, JR., COL, AC/S FAC DIST; GEN & SSTF, OCDR NRMC, NRDC /319

NNNN

462 JUN82

Similar should include future dates. C

LAND FILL Permit Except

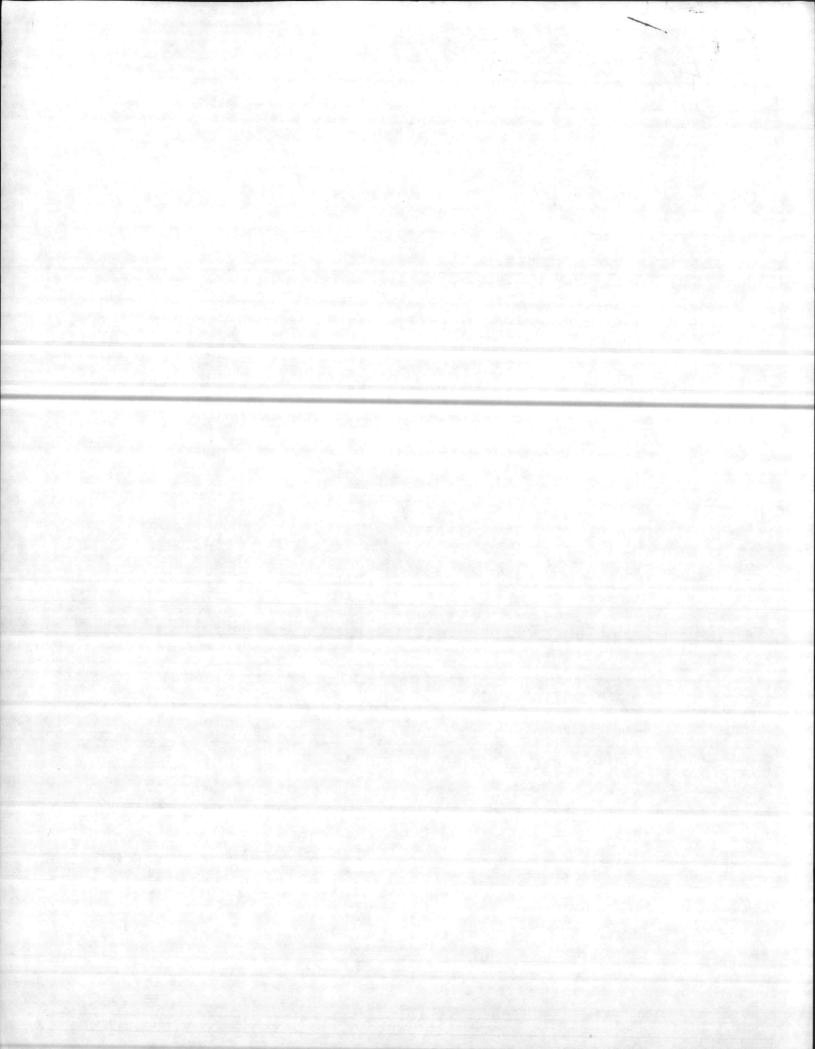
PERMIT NO. 67-03

DATE ISSUED 7/20/82

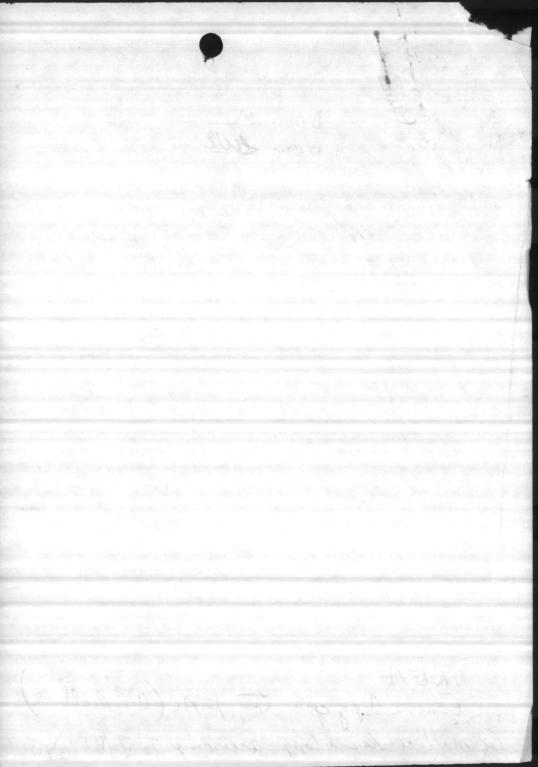
SOLID WASTE PERMIT

Conditions of Permit:

- This permit may be subject to review at an administrative hearing upon petition of anyone whose legal rights, privileges and duties may have been affected by the issuance thereof.
- 2. This permit shall not be effective unless the certified copy is filed in the register of deeds' office, in the grantor index under the name of the owner of the land in the county or counties in which the land is located.
- The "Certification of Recordation of Solid Waste Permit" returned to the Solid & Hazardous Waste Management Branch prior to receiving solid waste at the site.
- 4. This solid waste disposal site is permitted to receive solid waste as defined in 10 NCAC 10G, .0101(31), except that hazardous waste, liquid waste and any other wastes that may pose a threat to the environment or the public health are prohibited from disposal at this site unless prior authorization is obtained from the Division of Health Services.
- 5. This permit is for construction according to plans by McDowell-Jones, P.A., dated March, 1982. Any modification or deviation from the approved plans shall be approved by the N.C. Solid & Hazardous Waste Management Branch.
- 6. The fly ash area is operated so as to provide cover on the horizontal surface daily. The working slope of the area will not require daily cover if the fly ash does not become airborne. The fly ash should be graded and compacted daily, when disposed. Top cover for the fly ash may be other demolition material.
- 7. The grease holding pond is not part of this permit.
- Ground-water monitoring wells are installed as shown in red on pages 1 and 2 of the plans per the enclosed specification.
- Water quality monitoring will be the responsibility of Camp Lejeune Marine Corps Base. Parameters and sampling procedures will be outlined and forwarded. Results of water quality tests shall be forwarded to this office annually.



NATURAL RESOURCES AND ENVIRONM AL AFFAIRS DIVISION BASE MAINTENANCE DEPARTMENT MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA 28542 A BMO ME / June 81 From: Director, NREA Division To: B m0 Subj: attached DLA Memo Subjemens appeared in NREA office this date. It appears DLA has or is attempting to serve MCB. They are coming up with almin . road-block and not carried out Thos responsibility as assigned by DOD. Of millie has a Copy according to TMI Pan





NSE LOGISTICS AGENCY DEFENSE PROPERTY DISPOSAL SERVICE DEFENSE PROPERTY DISPOSAL REGION OFFICE MEMPHIS 2163 AIRWAYS BLVD.

MEMPHIS, TENNESSEE 38114

REFER TO

DPDR-MPW (Mr. Delaney/(AV)966-9872/jr)

20 May 1981

SUBJECT:

Hazardous Waste Storage Facility Meeting

TO:

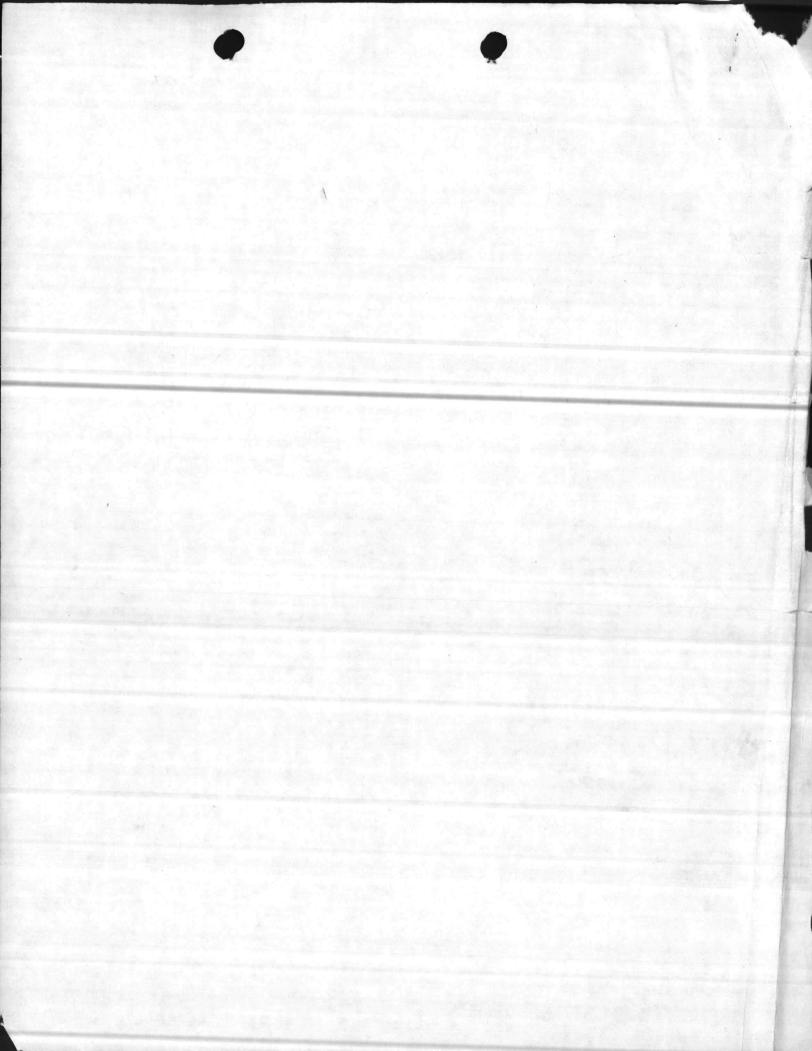
DPDO-Lejeune (ZWM)

1. Reference USMC Memorandum to Record, 7 May 1981, subject as above.

Re Paragraph 4 of the referenced MFR. Mr. Delaney agreed that the DPDO could accept custody with the understanding that the modifications to the building were accomplished and with the concurrence of DPDS Headquarters. Subsequent communications with DPDS has resulted in the decision that DPDS/DPDO will not accept accountability for facilities until full conformity to current accepted standards. In this regard, please coordinate this information to Mr. Dan Sharp, Environmental Affairs Office and the Host ISA Coordinator as changes to the ISA cannot be initiated until the facilities are completed.

> CHAEL A. FUCCI Colonel, USA

Commander



ROUTING SLIP

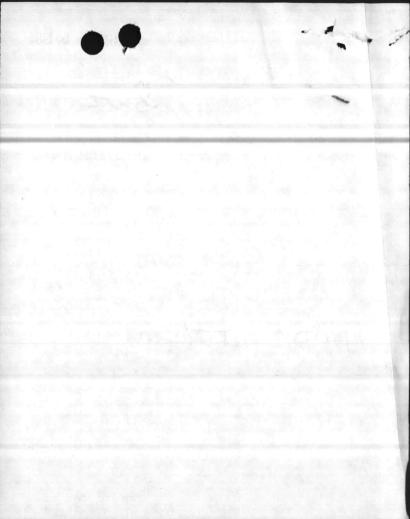
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ASSISTANT CHIEF OF STAFF, FACILITIES HEADQUARTERS, MARINE CORPS BASE

DATE / July

TO:

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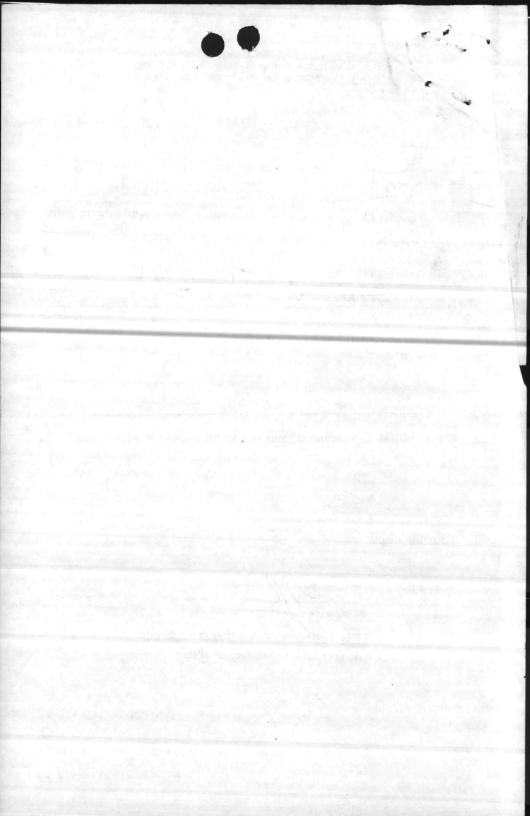
TO BMO

Attached is forwarded for info/action.

3. Your file copy

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

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





DEFENSE LOGISTICS AGENCY DEFENSE PROPERTY DISPOSAL SERVICE DEFENSE PROPERTY DISPOSAL REGION OFFICE MEMPHIS 2163 AIRWAYS BLVD.

MEMPHIS, TENNESSEE 38114

g JUN 1981

IN REPLY REFER TO

DPDR-MPW (Mr. Delaney/(AV)966-9872/cp)

Responsibilities of the DPDO in Accepting Accountability SUBJECT:

of Hazards and Toxic Material

TO:

Commander

United States Marine Corps Facilities Operations Office ATTN: Major J. A. Marapoti

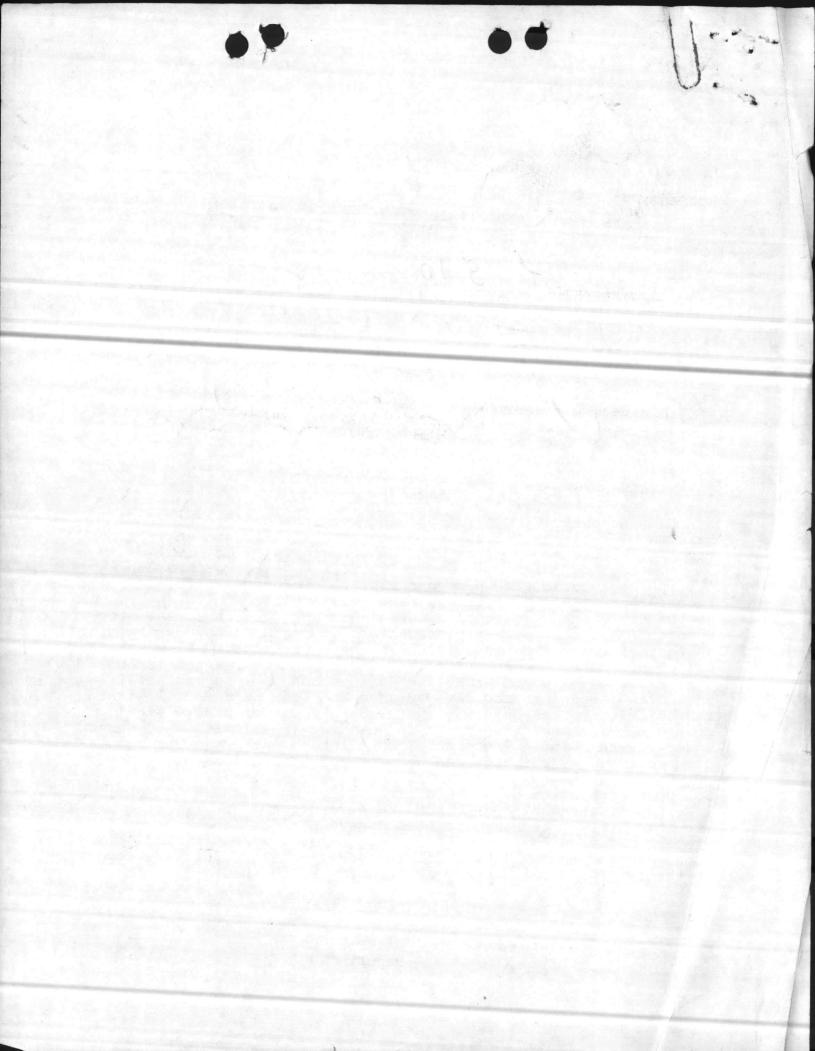
Camp Lejeune, North Carolina 28542

1. Reference conference telephone conversation, 2 June 1981, between Colonel K. P. Millice, USMC; Mr. Marvin King, Defense Property Disposal Officer, Camp Lejeune; Lt Col Wallace R. Pyne, USAF, Chief, Operations Division, DPDR; and Mr. Bishop Delaney, Chief, Facilities and Equipment Office, DPDR, subject as above.

- This letter is to confirm the agreements between the personnel in the above telephone conversation.
- Camp Lejeune, USMC, will proceed with the modification of Building TP-451 and the construction of a similar pre-engineered metal structure as shown on USMC Drawing 14224, 7 May 1981.
- In the interim time period during which construction is being accomplished, Supply Division, USMC, will utilize Building TP-451 as the designated Hazardous Material Storage facility, retaining it upon the base real property accountability records and maintaining custody of the stored material. The Defense Property Disposal Office will accept accountability of the material stored in Building TP-451 as "accepted-in-place" status and will provide assistance in storing/locating properly packaged and labeled material within the building in consonance with the Base Environmental Office's guidance. The material stored in Building TP-451 will be covered under the Base Spill Prevention Control Plan and any other regulatory controls as pertains to the storage of hazardous materials.
- Upon completion of the modification of Building TP-451 and the erection of the additional storage structure and ancilliary construction, i.e., fencing, lighting, paving, etc., the Defense Property Disposal Office will accept the accountability for this storage compound and it will be included in the property agreement in the Inter-service Support Agreement with the Host.

DAVID W. GREEN

Deputy



MAY 1 7 1982

Fromt Base Haintenance Officer
To: Public Works Officer (PWO)

Via: Assistant Chief of Staff, Pacilities

Subj: Disposal of Low-Level Radioactive Wastes; request for assistance with

Ref: (a) NAVSUPINST 5101.9B

(b) FONEGON by Ms. Irene Uselski, NSC, and Mr. D. Sharpe, BMaintDiv, of 8 Feb 82

Encl: (1) CG NCB ltr MAIN/BWE/th 6240 of 9 Sep 1982

(2) West Nuclear Corps ltr of 31 Mar 1982

- 1. The subject materials, described in enclosure (1), were generated by the Naval Medical Field Research Laboratory formerly located aboard Camp Lejeune. Enclosure (1) requested assistance from Naval Supply Center (NSC), Norfolk, (Code 105.1) in accordance with reference (a) and provided required funding documentation. This command initiated enclosure (1) with the understanding that NSC would handle the disposal including providing all technical expertise required. Mowever, during reference (b), Marine Corps Base, Camp Lejeune personnel were advised that MSC's role would be basically clerical in nature. NSC also advised that the contractor would deal directly with Camp Lejeune. NSC advised that after all technical problems were addressed and necessary permits obtained, NSC would draw up the disposal contract. Enclosure (2) outlines information/action required.
- 2. Base Maintenance Division does not have technical expertise in this area. Therefore, it is requested PWO submit an Engineering Service Request requesting assistance from the Engineering Field Division, Norfolk with this matter. In that the NSC has apparently entered some type of arrangement with West Nuclear Company (see enclosure (2)), the possibility of contracting for technical assistance from West Nuclear should be pursued.
- 3. Point of contact in this matter is Mr. Danny Sharpe, Natural Resources and Environmental Affairs Branch, telephone 2083.

B. W. ELSTON

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State of Washington Department of Social and Health Services HEALTH SERVICES DIVISION RADIATION CONTROL PROGRAM



PERMIT NO. 1443

Site Use Permit

REGISTRANT

U.S. Marine Corps. Assistant Chief of Staff, Facilities Marine Corps Base Camp Lejeune, North Carolina 28542

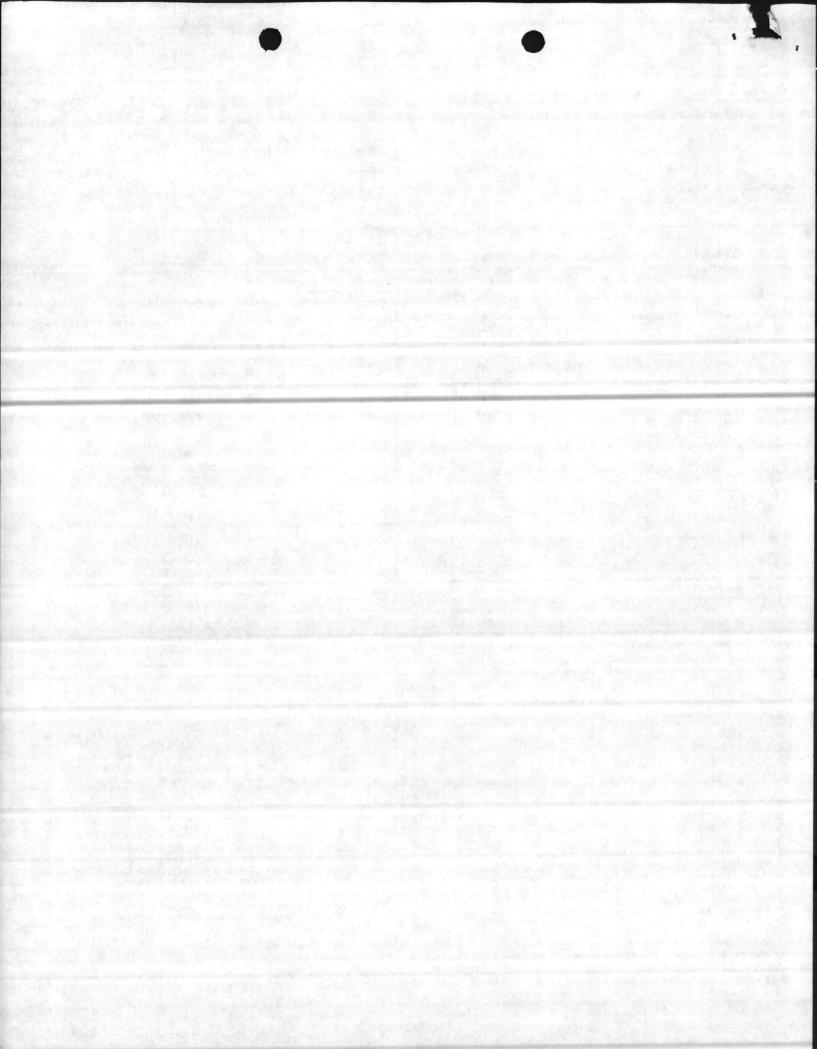
DSHS 13-437 Rev. 6/80

PERMIT DOES NOT IMPLY APPROVAL

EXPIRES: January 31, 1984

The person or firm to whom this certificate is issued is subject to the provisions of Chapter 70.98 of the Revised Code of Washington.





JOHN SPELLMAN Governor



STATE OF WASHINGTON

DEPARTMENT OF SOCIAL AND HEALTH SERVICES

Olympia, Washington 98504

April 28, 1982

TO:

All Site Use Permit Holders

FROM:

E. Lee Gronemyer, Manager Radioactive Waste Program

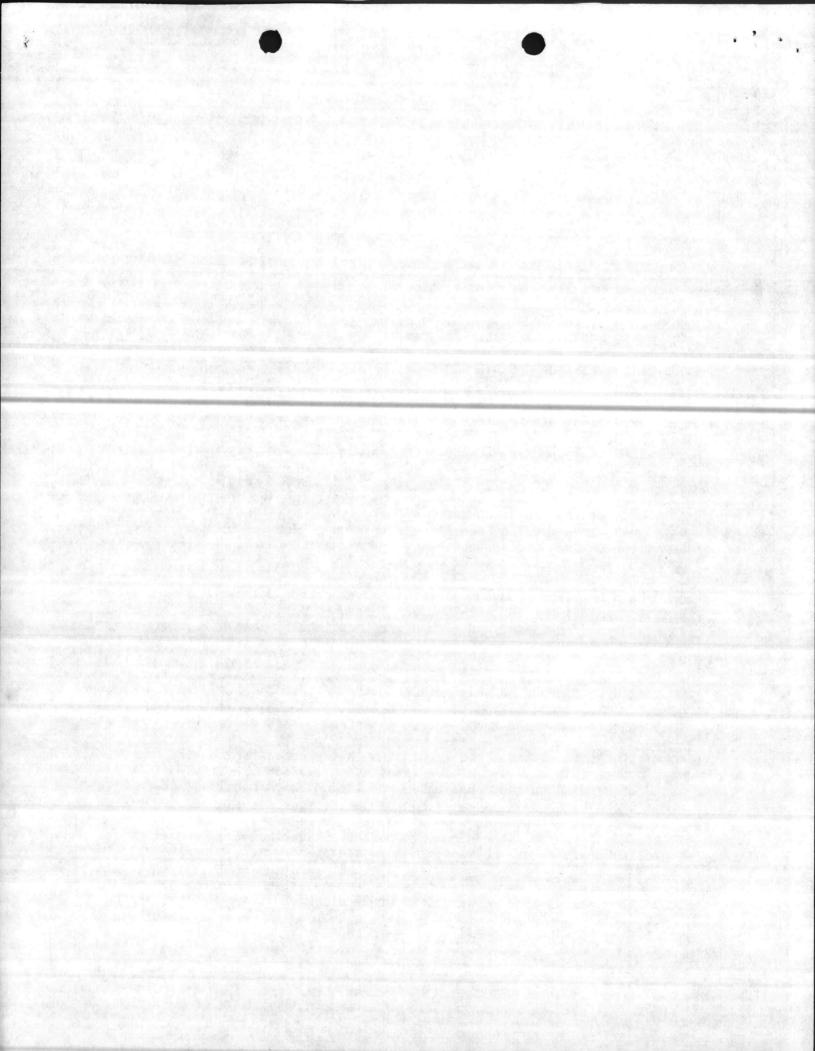
SUBJECT: WASHINGTON STATE RADIOACTIVE WASTE DISPOSAL INFORMATION

The increasing volumes of low level waste handled at Washington's disposal facility near Richland calls for a restatement of policies and procedures consistent with the requirements of the United States Department of Transportation (DOT), the United States Nuclear Regulatory Commission (NRC), the State of Washington Administrative Code (WAC), and conditions of the license issued by the department to U S Ecology, Inc., for its operation of the site. Our intention is to address the disposal practices and procedures which have been modified and "fine tuned" over a period of time, and to bring our several previous guidance memoranda together in one policy statement.

As a holder of a Washington State Site Use Permit you have received a copy of our regulations, WAC 402-19-530. These regulations state clearly that each generator/packager and each broker must have a site use permit whenever both are involved in the shipment of low-level radiactive waste (LLW) to Washington.

In the case of brokered shipments, the broker must ascertain that generators have current, unencumbered site use permits prior to receipt of LLW from those generators. The term "letter of intent" is obsolete.

Washington's regulations require that both the generator and the broker(s), when both are in any way involved, must sign the form certifying to the State of Washington that applicable regulations have been met and that the State of Washington is indemnified from all losses associated with the waste shipments in question. In both of these situations, i.e., permits and certification forms, it has come to our attention that all generators of radioactive waste have not applied for site use permits, nor have all generators and brokers been signing the certification form. We are alert to these situations and are informed by our assistant attorney general that irregularities in thse areas constitute a clear violation of "Washington State Rules and Regulations for Radiation Protection" and may result in the suspension of site use permits.



U S Ecology, Inc., has recently revised its Radioactive Shipment Report (RSR) to clearly identify the generator of each package of waste received at the site. This generator information is important. Please be advised that the information on the RSR, the certification(s) and the site use permits must be coordinated. Failure to do so may result in the delay of a shipment being accepted for disposal or perhaps not being accepted.

Shipment Certification

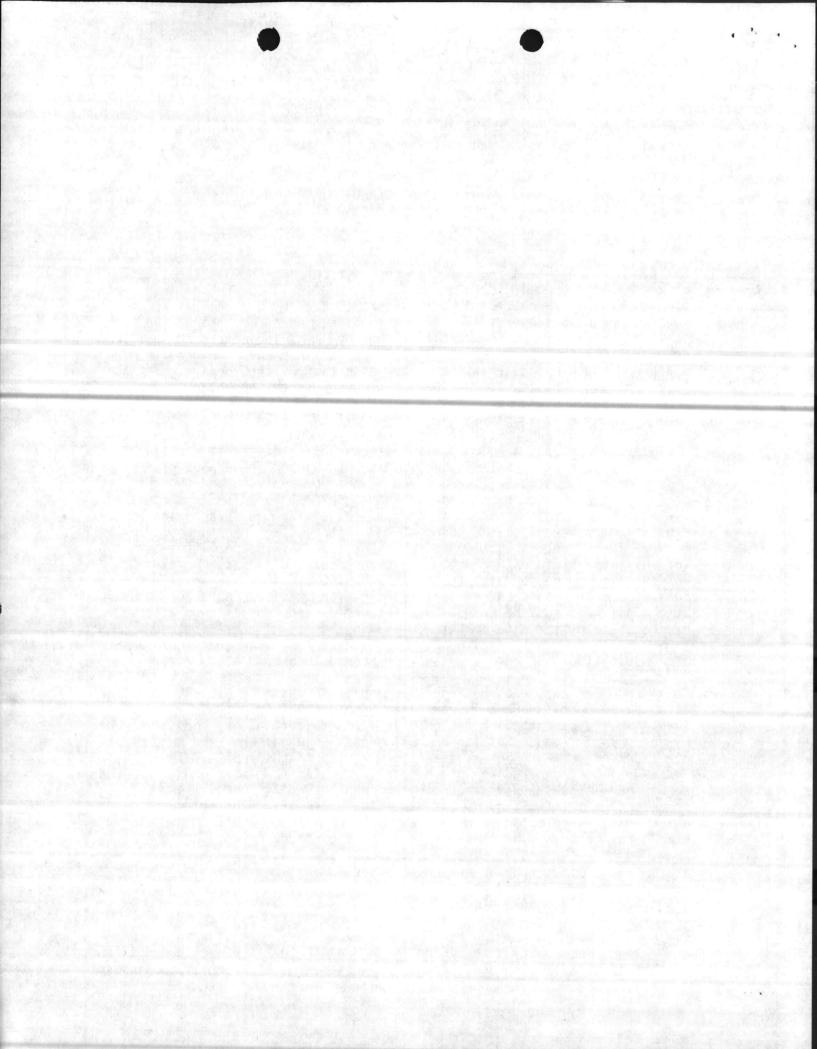
Clarification has been requested in the past concerning what constitutes brokerage; for example, does a simple telephone call to arrange transportation constitute "brokerage"? Our Assistant Attorney General has opined that such action does indeed fall within the definition of brokerage; the broker's section (Section B) of the certification form must indicate such involvement. However, if no broker is involved with a given shipment, the generator/shipper must so indicate in the broker's section of the form (e.g., "No broker used)". Waste will not be accepted unless the brokerage status of the shipment is indicated.

A properly completed certification form must accompany each shipment of radioactive waste to the low level waste burial site. "Certification", as used here, is a statement signed by: (1) the shipper/ generator of a shipment of radioactive waste, (2) the broker, if one is involved, and (3) the carrier of that shipment of waste. The signators "certify" in part, that the shipment has been inspected for compliance with the laws, rules and regulations relevant to the shipment and that no items of noncompliance were found. The signators, acting as representatives of the permittee, also indemnify the State of Washington, within specified limits, for claims, losses, etc. connected with the material. The certification shall be submitted to a Department of Social and Health Services inspector or designee at the site and must be judged to be properly executed prior to acceptance of the waste by the site operator. The instrument of certification is DSHS form RHF-31A for commercial generators, form RHF-31B for state governments and institutions, or form RHF-31C for federal generators.

It is required that each package of radioactive waste be clearly identified as being so certified and is coming to Washington from a quickly and clearly identifiable, permitted generator. It is intended that one form be executed by one shipper/ generator for one shipment; "shipment" as used here means one truck or semi-trailer as it arrives at the disposal site. The use of individual miniaturized and often poorly executed forms for each package in a shipment imposes a time consuming and unnecessarily onerous inspection procedure. It is sufficient that the single certification relevant to one generator's share of a mixed shipment (two or more generators involving one broker in one truck) be completed only by the generator in Section A, provided that the broker executes one additional form keyed to all the others and completed by broker and carrier in Sections B and C.

Reinstatement Procedure

Contrary to what you may be hearing or seeing, the State of Washington has not changed its policy with regard to the reinstatement of suspended site use permits. Following a suspension, reinstatement of a permit to dispose



of low-level radioactive waste in Washington will be made only after the permit holder's waste generation procedures and quality assurance program have been evaluated and found adequate.

We strongly <u>recommend</u>, but do not require, that the radioactive materials licensing agency with jurisdiction (either NRC or an Agreement State) inspect the permit holder's waste generation facilities and procedures prior to our reinstatement. The basis for the review and audit of the permit holder's waste generation facilities and procedures should be the audit program developed by the Waste Generation Committee of the Atomic Industrial — Forum or an equivalent procedure.

It is again suggested, but not required, that the Washington Radiation Control Section receive a written report from the permit holder's regulatory agency describing the results of that inspection.

DISPOSAL OF LIQUIDS

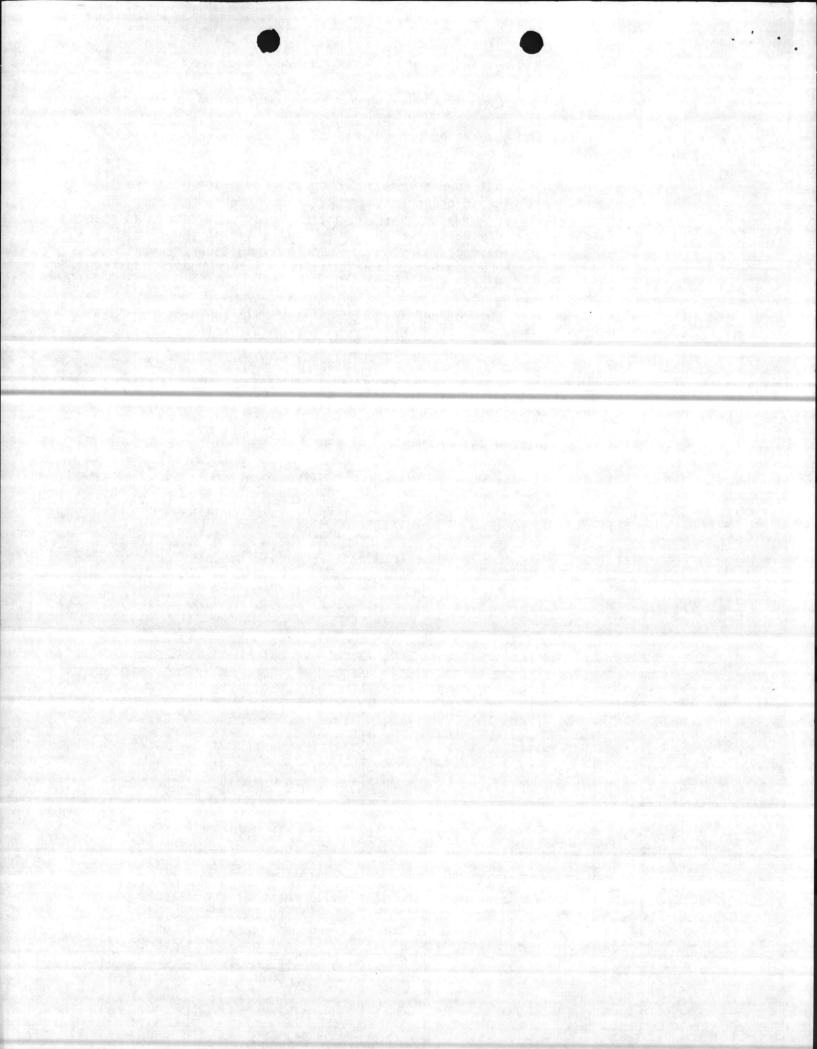
General - Liquids must be treated before they can be accepted at the Washington disposal site. For most liquids such treatment must be either by absorption or solidification processes.

Implicit in the approval of any medium for the treatment of liquids is the requirement that the resultant waste be in compliance with the provisions of DOT, NRC, WAC and the site operator's license. The definition of "free standing liquid" is pertinent to solidified waste. It does not apply to absorbed liquids since the specified "...enough absorbent material to absorb at least twice the volume of radioactive liquid..." provides no leeway.

Absorbents

A condition of the site operator's license specifies in part, "...the licensee shall not receive any liquids which have not been absorbed or solidified". It further states, "Only absorbents approved by the department shall be used". Since the department lacks the capabilities and facilities for testing and approving absorbents, we are approving only those which have been proven successful over time and through routine use. Capitalizing on information and records of use from the many waste generators, the established list of absorbents is based on acceptable use results and/or individual company testing criteria. The department has reasonable confidence that absorbents listed in Attachment 1 can be used with acceptable results.

The department recognizes the need to keep pace with improving technology and recognizes also that the list of absorbents approved at this time is not all inclusive. We realize that several absorbents in common use have not been listed. We further realize that as experience is gained with absorbents some will be added to the list and perhaps others deleted. Continued acceptance and use of an absorbent will be based on our program of routine surveillance and monitoring of packaged radioactive wastes. The unlisted absorbents currently used by generators are not being overlooked or rejected. The department will approve, on a case by case basis and as data



are supplied, the use of absorbents which do not appear on the list. In order to obtain the department's approval of an absorbent that is not listed in the attachment, testing data must be submitted indicating documented and reproducible experience with the absorbing capabilities of the materials in question. Documentation should describe all details of a quality assurance program including proportions, materials description, temperature, vibration effects and types of liquids absorbed. Attachment II details procedures for the use of such absorbents in the packaging of some specific wastes.

Solidification

The alternative treatment for liquids is solidification and Attachment III lists media approved by the department. The mechanism of approval is the same as for absorbents.

Waste Forms .

Attachment IV, listing license conditions and redundant in part, is an excerpt from a previously issued memo which is included for its substance.

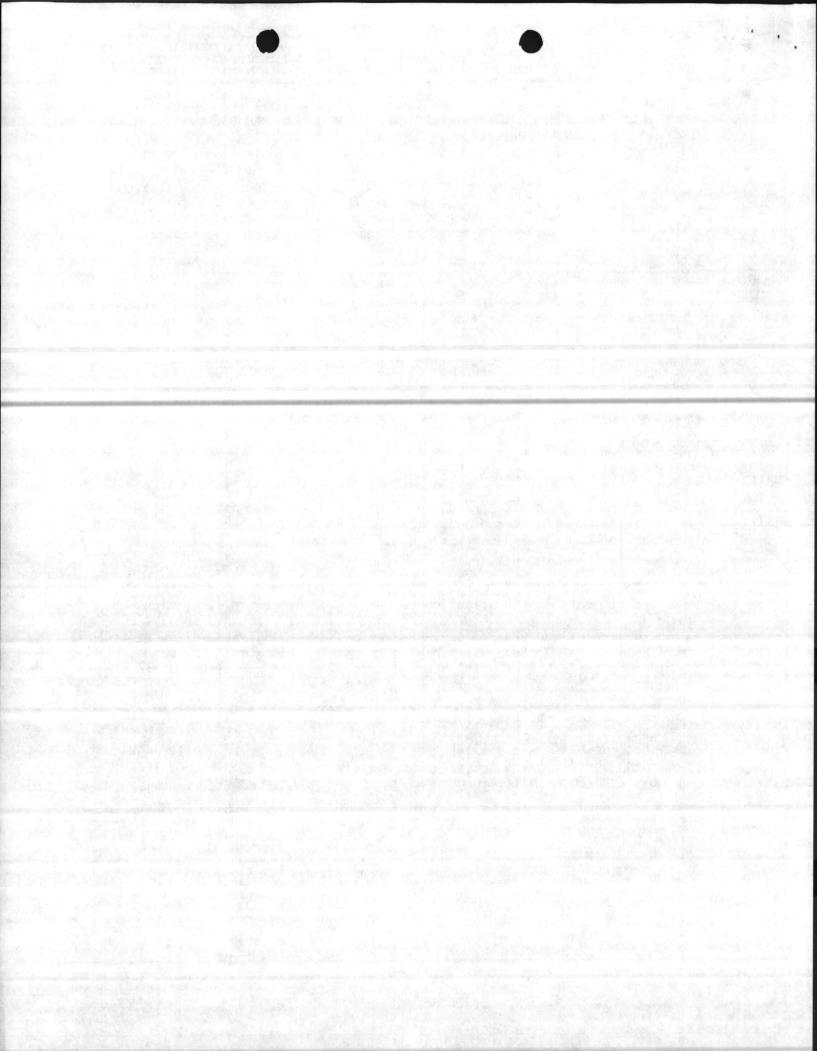
Regulations

Attachment V is the text of WAC 402-19-530. Requirements for users of the Washington commercial low-level waste disposal site. The department will inform permit holders prior to any changes in license conditions or regulations which may result from implementation of the Northwest Interstate Compact for Low Level Radioactive Waste Management.

Summary

These statements of clarification concerning Washington's regulations are made in an attempt to further assure that existing state and federal regulations governing the generation, preparation, packaging, and transportation of low-level radioactive waste have been adhered to before such waste arrives in the State of Washington; and to eliminate any misunderstanding or misinterpretation of the permit and certification requirements in the regulations of the State of Washington and the conditions in the U S Ecology, Inc. radioactive materials license.

Recognizing that new questions and problems will arise, we invite inquires regarding the disposal of LLW in the State of Washington. Please feel free to call Earl Ingersoll at (206) 753-3353, or Lee Gronemyer at (206) 753-3462.

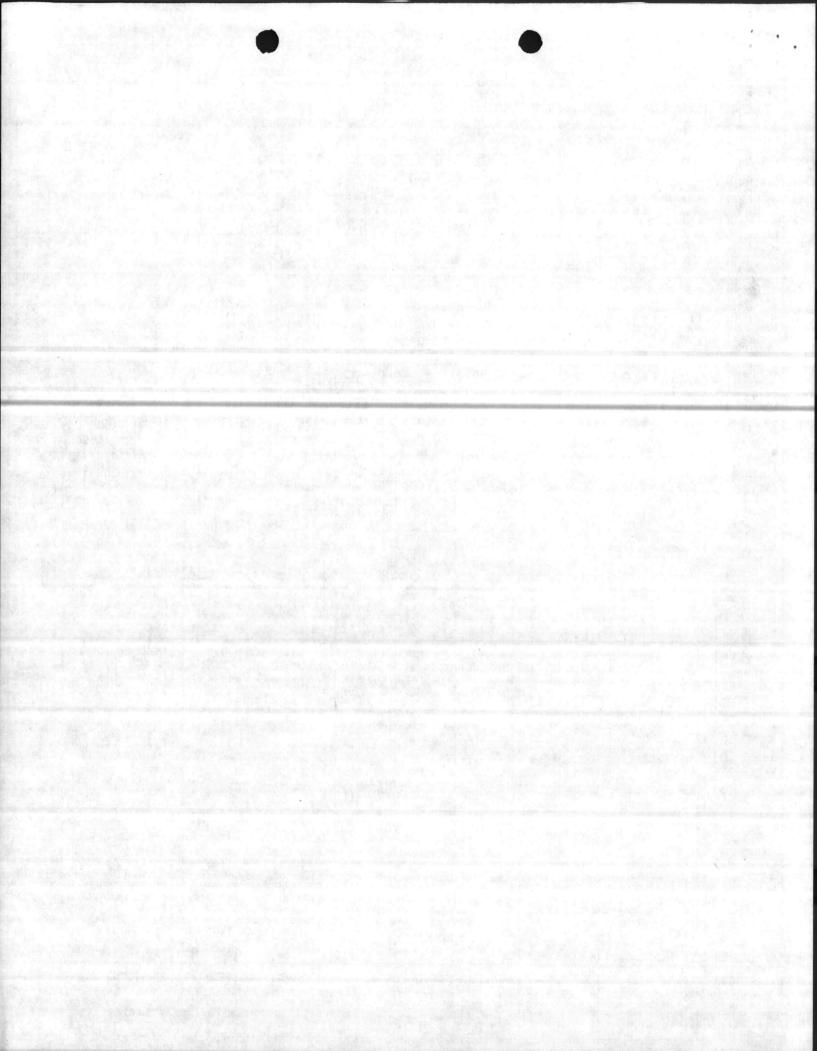


ATTACHMENT I

TABLE I - ABSORBENTS

- A. Diatomaceous Earth (Medium Grind)
- B. Speedi Dry
- C. Celatom (M-P 78)
- D. Floor Dry Super Fine
- E. Hi Dri
- F. Florco and Florcox
- G. Instant-Dri
- H. Safe-T-Sorb
- I. Oil-Dri (Safe n Dri)
- J. Zonolite Grade No. 2, 3 or 4 (Vermiculite)

Absorbency efficiencies and volumes of absorbent required could vary. In all cases, it is the responsibility of the waste generator and/or packager to determine the efficiency and proper proportions required for the liquids being absorbed.



Attachment II PROCEDURE A SORBED LIQUIDS,

- PACKAGING ABSORBED LIQUIDS, INCLUDING OILS
- Container must meet DOT Specification 7A requirements as listed in 49 CFR 173.395(a)(1-4).
- Container must be lined with 4 mil plastic liner and sealed at the top when container is packed.
- 3. Container must be filled with enough absorbent material to absorb at least twice the volume of radioactive liquid contents (ratio based on absorbency and not on volume or weight). Liquid should be placed at approximately every 12 inches of absorbent to ensure even dispersion.

PROCEDURE B

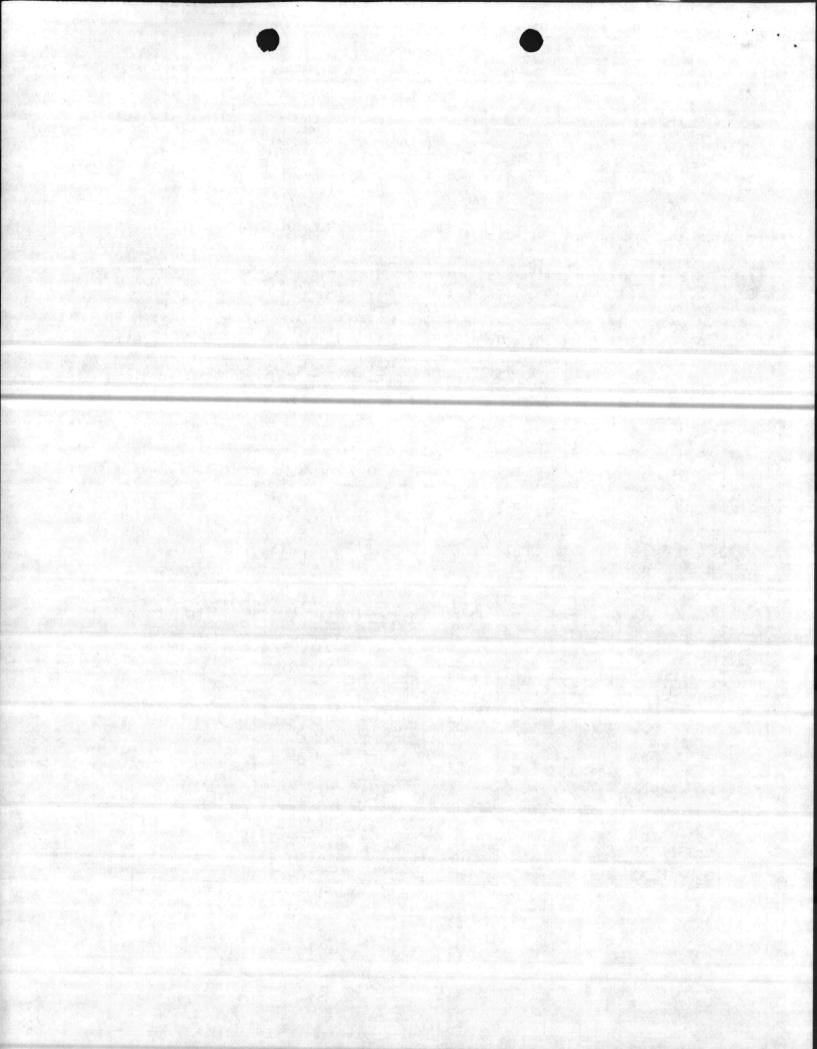
PACKAGING OF SCINTILLATION VIALS

- Container must meet DOT Specification 7A requirements as listed in 49 CFR 173.395(a)(1-4).
- 2. Container must be lined with 4 mil plastic liner and sealed at the top when container is packed. It is recommended that a layer of absorbent be placed in the bottom of the drum prior to the installation of the plastic liner.
- 3. Place approximately 3 inches of absorbent at the bottom of the container, inside the plastic liner. Vials and absorbent must be placed in the container in alternate layers not exceeding 6 inches in depth. The top layer of absorbent must be at least 3 inches in depth.
- 4. The vials are NOT to be opened.
- 5. Container must be filled with enough absorbent material to absorb at least twice the volme of radioactive liquid contents (ratio based on absorbency not on volume or weight).

PROCEDURE C

PACKAGING ANIMAL CARCASSES

- 1. All containers must meet DOT performance specification 7A. The final package will be a double-walled metal container with the outer container having a capacity at least 40 percent greater than the inner container (e.g., a 30 gallon drum in a 55-gallon or a 55-gallon drum in an 85-gallon drum).
- 2. Line the inner metal drum with 4 mil plastic liner.

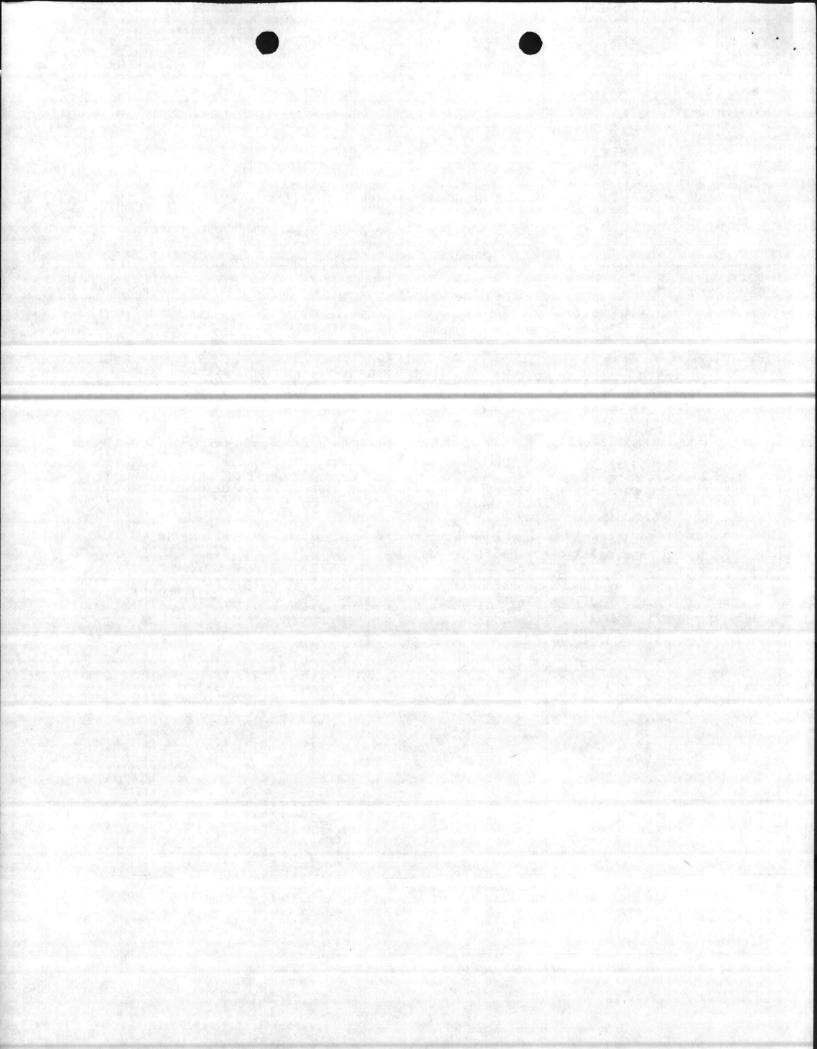


- 3. Place animal carcasses into the inner metal drum with absorbent and lime. Ratio: One part lime to ten parts absorbent.
- 4. Seal plastic liner and inner metal drum.
- 5. Place a minimum of 3 inches of absorbent in bottom of outer drum.
- 6. Place the inner metal drum inside the outer metal drum.
- 7. Place enough absorbent between the inner and outer drum to completely fill the void space.
- 8. Seal the outer drum.

A written request must be submitted and Departmental approval received prior to use of any absorbent not listed in Table 1. This request must contain the following information:

- 1. A statement of the absorbency of the material as determined by the manufacturer and copy of the manufacturer's descriptive information.
- 2. Absorbency for the actual liquid to be disposed must be determined by a bench test (e.g., Westinghouse, Gardner Coleman).
- 3. Additional factors such as vibration tests, gas generation, long term chemical and radiological stability.

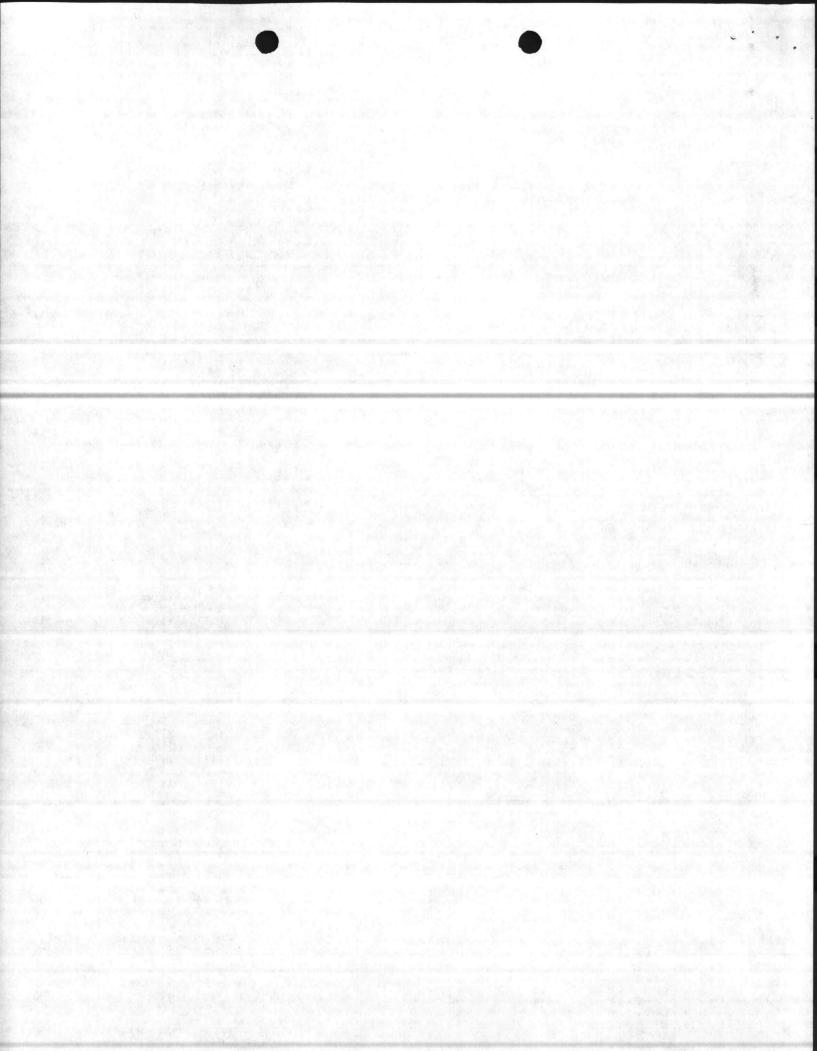
Approval of the absorbent or the procedure approval by the Department does not alter any liability or surety arrangements..



ATTACHMENT III

Approved Solidification Media

- 1. Asphalt
- 2. Delaware Custom Media
- 3. Dow Media
- 4. Portland Cement
- 5. U.S. Gypsum's Envirostone Cement
- 6. Other solidification media and processes as approved by NRC and/or the department.

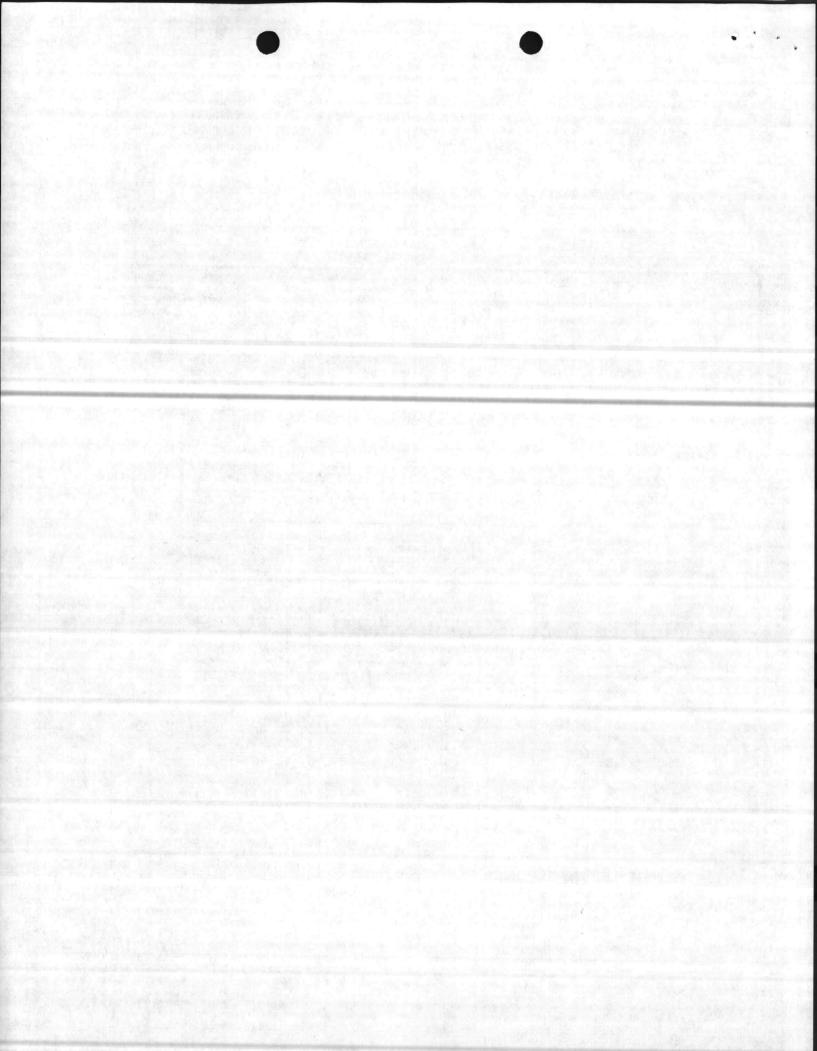


ATTACHMENT IV

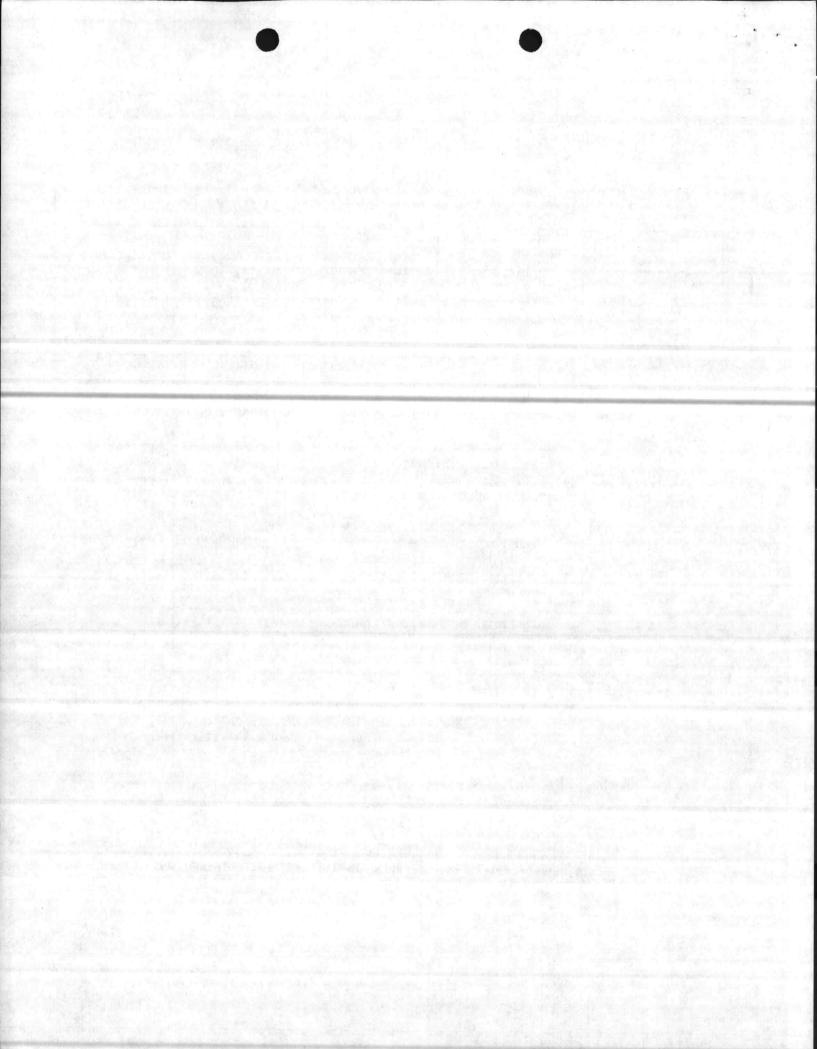
Several conditions of the US Ecology, Inc. radioactive materials license deal with authorized waste forms. These license conditions may require generators to change their waste handling procedures. Waste received by U S Ecology, Inc., after the effective date of the license conditions must be in an authorized waste form. The authorized waste forms are:

Effective Date	Waste <u>Form</u>	License Condition No.
In Effect	Liquids containing more than 1% oil must be either solidified, i.e., have no detectable free-standing liquid (not more than 0.5% or one gallon per container, whichever is less); or, absorbed with twice the absorbency required for the total volume of liquid.	26, 27
In Effect	Liquids (not otherwise specified) must be absorbed or solidified; solidified liquids shall have no detectable freestanding liquid (not more than 0.5% or one gallon per container, whichever is less).	27
	Absorbed liquids must be absorbed by enough approved absorbent material to absorb twice the amount of liquid present.	27
	Dewatered ion exchange resins and filter media must have no detectable free-standing liquids (i.e., not more than 0.5% or one gallon per container, whichever is less).	27f
In Effect	Ion exchange resins and filter media containing radioactive material having a concentration of 1 uCi/cc or greater of materials with half life greater than 5 years must be stabilized by solidification	27(k)
December 31, 1983	Until this date liquid scintillation vials and liquids and other organics in 50 milli liter or less size vials used in clinical or laboratory testing may also be accepted	

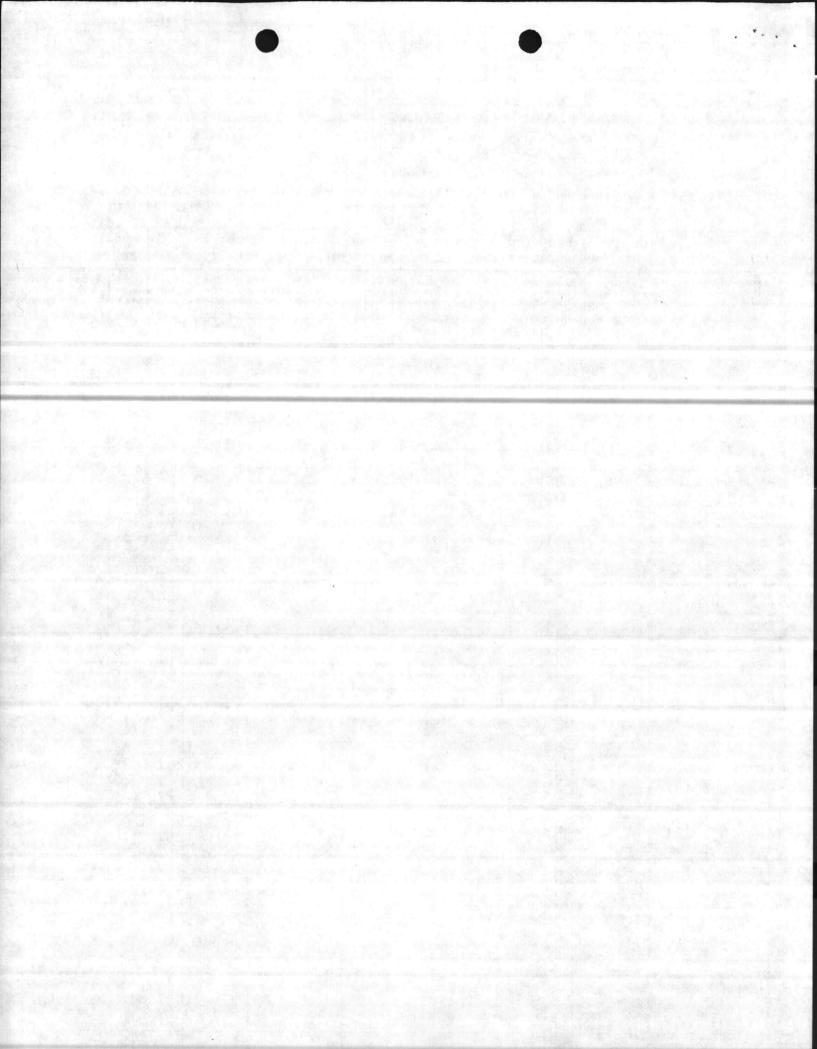
The dates for compliance with the license conditions were established so that industry and government would have adequate lead time to make necessary changes in waste handling equipment and processes.



ATTACHMENT V Wac 402-19-530 Requirements for users of the Washington commercial low-level waste disposal site. (1) Purpose and scope. Each generator/shipper and each broker of low-level waste shall have a site use permit prior to the disposal of such wastes at any commercial low-level radioactive waste burial site located in the State of Washington. The term "broker" as used in these regulations shall mean any person who acts as an agent or intermediary for a generator/ shipper or another person collecting and/or agreeing to arrange for the transport of radioactive waste generated by others, provided it shall not include a carrier whose sole function is to transport low-level radioactive waste. (2) Site use permit. Filing application for site use permit. (i) Application for a site use permit shall be filed on departmental form RHF-30 or a clear legible record containing all the informtion required on that form including but not limited to: U.S. Nuclear Regulatory Commission or agreement state license number, name of company, address, 24-hour telephone number, and contact person. (ii) Each appliation shall be signed by the applicant or a person duly authorized to act for or on the applicant's behalf. A site use permit must be obtained before disposal of low-level radioactive waste at any waste burial site is permitted. (c) Each permit shall be renewed annually. (d) Revocation of permit. The failure of one or more packages in a shipment of waste to be in compliance with the requirements of Title 402 WAC, the U.S. Nuclear Regulatory Commission, or the U.S. Department of Transportation, may cause the revocation of this use permit for the responsible waste generator/shipper or broker. Failure to comply with the requirements in the preceeding sentence may bar the acceptance of any other or subsequent shipment by the same generator/shipper or broker at the site. (ii) The site use permit may be revoked for a specific generator/ shipper or broker if a refusal to accept one or more of the shipments has beeen made by any other licensed commercial lowlevel waste burial site within the United States. (iii) The site use permit may be reinstated provided the generator/ shipper or broker submits documentation approved by the department describing its quality assurance program to achieve compliance for future shipments. -10-



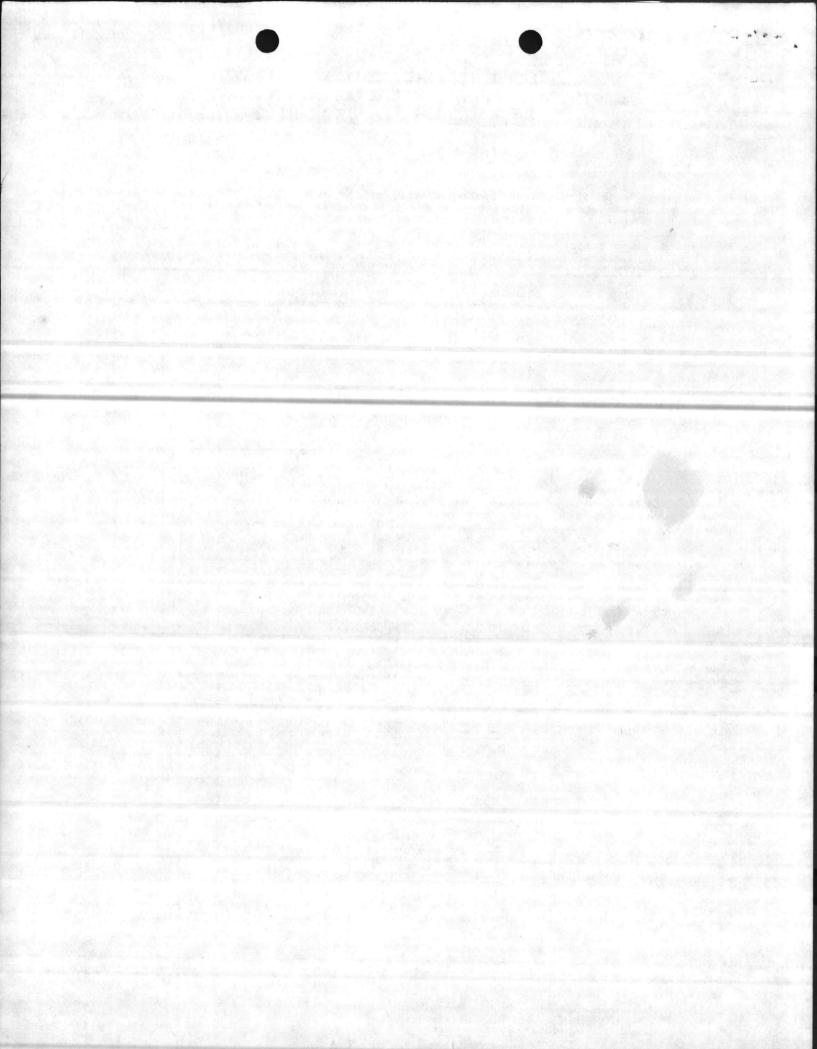
(3) Waste shipment certification. A low-level radioactive waste shipment certification shall be required to accompany each shipment of radioactive waste to the licensed low-level waste burial site. The certification shall be submitted at the burial site to the Department of Social and Health Services or its designee and must be judged to be properly executed prior to acceptance of the waste by the site operator. The certification shall be on departmental form RHF-31 or a clear legible record containing all the information required in that form, or the certification form provided for in executive order EO-79-09. The information shall include but is not limited to name of company, volume of waste in shipment, shipment number, permit number (when issued), and date.



LOW-LEVEL RADIOACTIVE WASTE SHIPMENT CERTIFICATION FOR THE FEDERAL GOVERNMENT AS A GENERATOR/PACKAGER, AND ITS BROKERS AND CARRIERS

The following certification, completed as applicable, is made to the State of Washington: Certification is hereby made to the State of Washington that Radiation Shipment Record No. of low-level radioactive waste has been inspected in accordance with requirements of the Governor of Washington's Executive Order dated November 19, 1979, prior to its shipment. Further certification is made that the inspection has revealed no items of non-compliance with all applicable laws, rules and regulations. As determined under the provisions of the Federal Tort Claims Act (28 USC § 2671-2680), the undersigned shall be liable for and hold harmless the State of Washington from any and all claims, suits, losses, damages or expenses on account of injuries to any and all persons whomsoever, and any and all property damage, arising or growing out of or in any manner connected with any activities performed under this order. Except for any violation of applicable existing state or federal statute or regulation respecting packaging and shipment, inspection and acceptance of any item or container or material covered by this certification by the State of Washington or a duly authorized contractor shall release the party who executed this certificate from any and all requirement of indemnification from injury or loss. SECTION A: FOR THE GENERATOR/PACKAGER: (Company Name) PERMIT NUMBER: ___ VOLUME OF WASTE IN THIS SHIPMENT: _ BY: __ DATE: _ TITLE: Certification is hereby made to the State of Washington that Radiation Shipment Record No. ____ of low-level radioactive waste has been inspected in accordance with requirements of the Governor of Washington's Executive Order dated November 19, 1979, prior to its shipment. Further certification is made that the inspection have revealed no items of non-compliance with all applicable laws, rules and regulations. The undersigned shall indemnify and hold harmless the State of Washington, in an amount not to exceed \$1,000,000.00 per individual who may be injured, provided that indemnification shall not exceed \$5,000,000.00 in total, for each occurrence, from any and all claims, suits, losses, damage. injury and expenses to any person whomsoever or to property arising or growing out of or in any manner connected with the activities performed under this order. Except for any violation of applicable existing state or federal statute or regulation respecting packaging and shipment, inspection and acceptance of any item, or container or material covered by this certification by the State of Washington or a duly authorized contractor shall release the party who executed this certificate from any and all requirement of indemnification from injury or loss. FOR THE BROKER: __ (Company Name) PERMIT NUMBER: ___ VOLUME OF WASTE IN THIS SHIPMENT: ___ ____ BY:_____ DATE: _____ TITLE: SECTION C: FOR THE CARRIER: __ (Company Name) VOLUME OF WASTE IN THIS SHIPMENT: BY-TITLE: ___





MAIN/JIW/spk
6240
DATE: 17 February 1982

FROM Director, Natural Resources and Environmental Affairs Branch

TO Memorandum for the Record

SUBJ Hazardous Waste News Release

Ref

- (a) Meeting btwn MAJ Schwartzenburg and COL Mount, BMO, and J.I. Wooten and Danny Sharpe, NREAB on 16 Feb 1982
- (b) CG 1tr MAIN/DDS/th 6240 of 8 Jan 1981
- 1. During reference (a), the contents of reference (b) was discussed and a copy of reference (b) with enclosure was provided to MAJ Schwartzenburg so a news release could be made due to inquiries from local news media: Channel 7 TV, Channel 12 TV, WJNC, and Daily News. The news interest was generated by the Governor's press release related to Hazardous Material Disposal in North Carolina which was based on an EPA list of sites compiled as required by Section (103(c) of Superfund.
- 2. The news release will be cleared by Chief of Staff.

J. V. Woolin

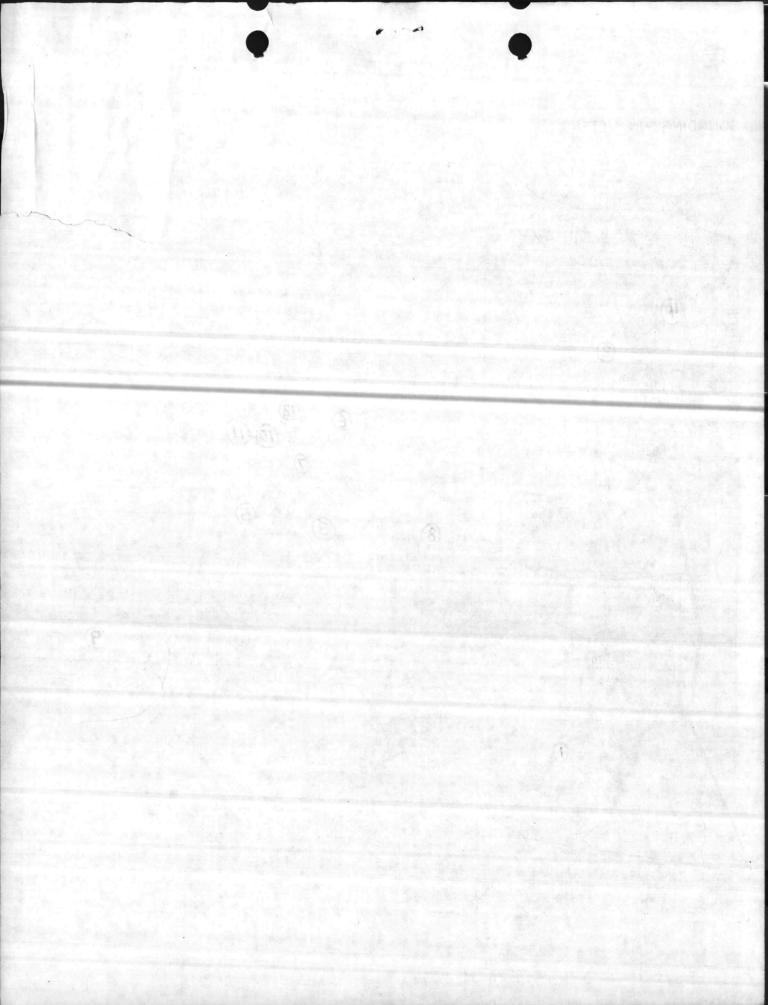
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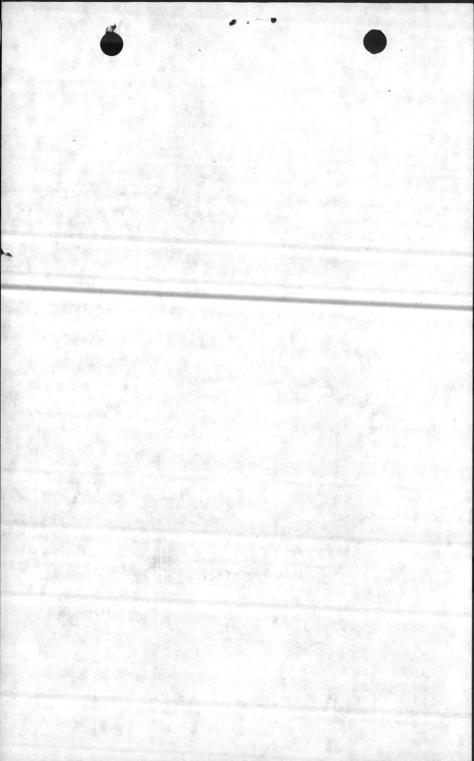
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SOUNDINGS IN METERS



Reputable Quantities 55 gallens or more

Site# Chemina Ranilfull MCASH) Bun Pit 2 Hadnot Pant Burn Dung 3, CAMP Gerger Burn Dump 4 Buse Spritary Land fill 5 Provide vector Repeat Lab (Radicalhire Buttons) Lot 140 (PCB) 6 RAngik-326 Ordnunce Objese 8 GHA Peneze ordrance 9 TPHS2+HS1 - Flammable 10 Storage (fire incident) Base Fire Dept Burn Pit 11 Lots 201 + 203 (Pass, 6/4) 12



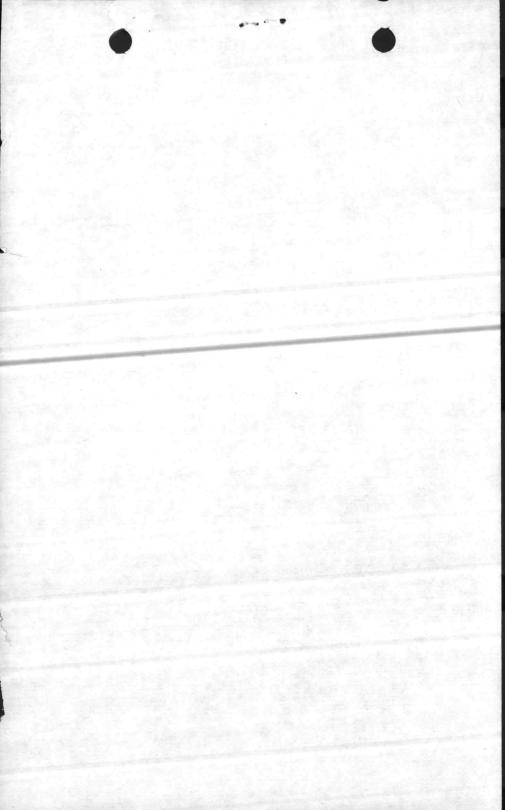
NATURAL RESOURCES AND ENVIRONMENTAL FAIRS BRANCH BASE MAINTENANCE DIVISION MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA 28542

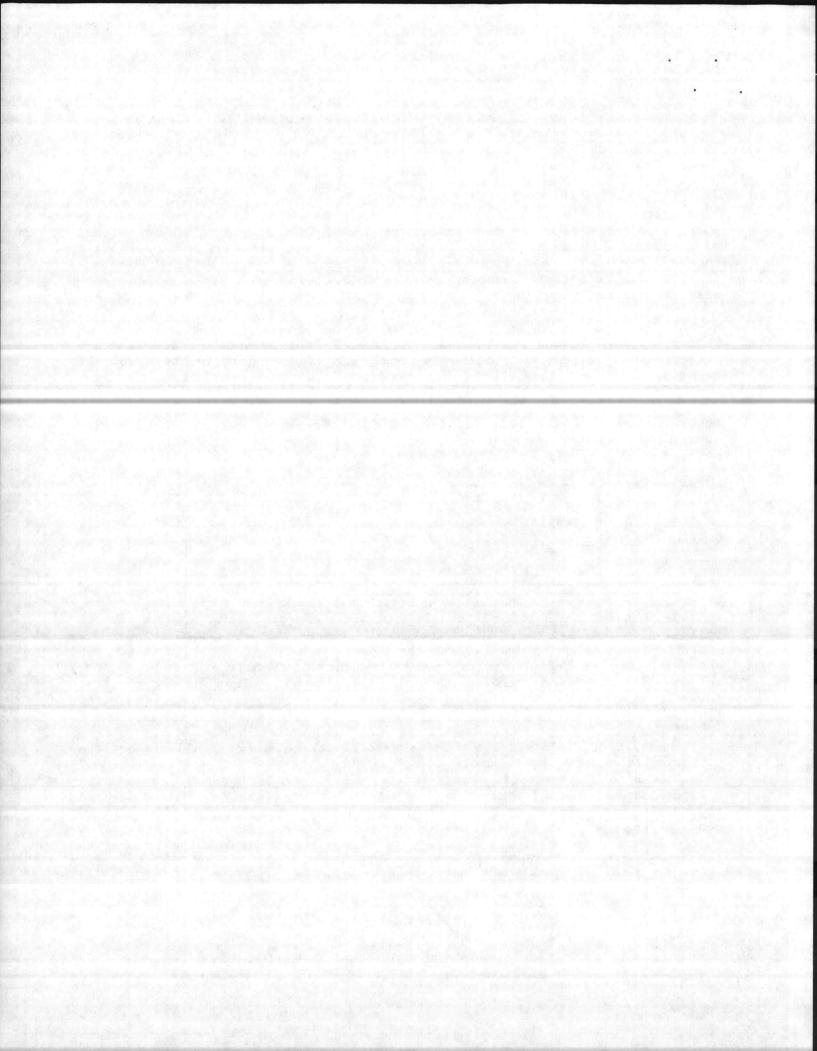
From: Director

To: Bmo

Subj: Beta-Buttons backgraphings

Hg Wort





Material ~ (Category	pounds (kilograms)	Material	Category	pounds (Mograms)
Antimory potassium tartrate	С	1,000 (454)	Epichlorohydrin	. с	. 1,000 (454)
Antmony tribromide	C	1,000 (454)		. A	. 10 (4.54)
Antimony trichloride	C ·	1,000 (454)	Ethybenzene	C	1,000 (454)
Antimony trifluoride	C .	1,000 (454)	Ethylenediamine	- C	1,000 (454)
Animony trioxide	D	5,000 (2,270)	Ethylene dibromide	. C .	1,000 (454)
Vrsenic disulfide	D .	5,000 (2,270)	Ethylene dichloride	. 0	5,000 (2,270)
Vseric pentoxide	D	5,000 (2,270)	EDTA	. D	5,000 (2,270)
	0		Ferric ammorium citrate		1,000 (454)
rsenic trichloride		5,000 (2,270)	Ferric ammonium oxalate		
Vsenic trioxide	D .	5,000 (2,270)			1,000 (454)
Arsenic trisulfide	D	5,000 (2,270)		- C	7 1,000 (454)
Barium cyanide	A	. 10 (4.54)	Ferric fluoride	- B	. 100 (45.4)
Benzene	C	1,000 (454)	Ferric ratrate	_ C	- 1,000 (454)
Banzoic acid	D	5,000 (2,270)	Ferric sulfate	_ C	1,000 (454)
Benzonitrile	C	1,000 (454)	Ferrous ammonium sulfate		1,000 (454)
Benzoyl chlorida	C -	1,000 (454)	Ferrous chloride	. B	100 (45.4)
Benzyl chloride	B	100 (45.4)	Ferrous sulfate		1 1333 (454)
Beryllium chloride	D	5,000 (2,270)	Formaldehyde	. C	1,000 (454)
Beryfium fluoride	D	5,000 (2,270)	Formic acid	_ D	5.000 (2.270)
Beryllium nitrate	D	5,000 (2,270)	Furnaric scid	D :	5,000 (2,270)
Butyl acetate	D	5,000 (2,270)		_ C	1,000 (454)
-Butyl phthalate		100 (45.4)	, FULLA CO	×	5,000 (2,270) 1,000 (454) 1 (0,454) 1 (0,454)
	0	100 (45.4)	Heptachlor		
kutylamine	C ···	.: .1,000 (454)			1 (0.454)
Butyric acid	D	5,000 (2,270)	. Hexachlorocyclopentaciene	_ X	1 (0.454) 1 (0.454) 5,000 (2.270)
admium acetate	B	100 (45.4)			
admium bromide	B	100 (45.4)	Hydrofluoric acid	_ D	5,000 (2,270
admium chloride	B	100 (45.4)	Hydrogen cyanide		10 14.54
alcium arsenete	.6	1,000 (454)	Hydrogen sulfide	_ B	100 (45.4
alcium arsenite	C	1,000 (454)	Isoprene	_ C	1,000 (454
alcium carbide	D	5,000 (2,270)	Isopropanolamine	C :""	1,000 (454
alcium chromate	· C · · ·	1,000 (454)	dodecyloenzenesulfonate.		
alcium cyanide	A	7 10 (4.54)		_ D	5,000 (2,270
alcium	C	1,000 (454)	Kepone		1,000 (454)
dodecylbenzenesulfonate.	Y .		Lead acetate	_ D	5,000 (2,270)
Celaium hydroxido unum		5,000 (2,270)	Leed arsenate	_ D	5,000 (2,270
	B 5	100 (45.4)	Lead Chloride		5,000 (2,270
alcium hypochlorite	100 POST 201 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	100 (45.4)		- 0	5,000 (2,270
alcium ando	- L	5,000 (2,270)	Lead fluoborate	D	5,000 (2,270)
ectan	A	10 (4.54)	· Lead fluoride		1,000 (454
arbaryl		100 (45.4)	Lead iodida	_ D	.5,000 (2,270)
arbofuran	A	10 (4.54)	Lead nitrate	_ D	. , 5,000 (2,270)
at on disultide	D :	5,000 (2,270)	Lead stearate	- D	. 5,000 (2,270)
arbon tetrachlorid		5,000 (2,270)	Lead sulfate	_ D	5,000 (2,270)
hlordane	Χ .	1 (0.454)	Lead suffide	. D	5.000 (2,270)
hlorine	A	10 (4.54)	Lead thiocyanate	. D .	5,000 (2,270)
hlorobenzene	B	100 (45.4)	Lindane	_ X	1 (0.454)
hloroform	D	5,000 (2,270)	Lithium chromate	C	1,000 (454
hlorpyrifos	X ·	1 (0.454)	Malathina		10 (4.54
hlorosulfonic acid		1,000 (454)		. D	5,000 (2,270
hromic acetate	C .		Malain naturalida	. 0	5,000 (2,270)
		1,000 (454)	Maleic anhydride	- 0	5,000 (2,270)
hromic acid	C	1,000 (454)	Mercaptodimetrur	_ B · ~	100 (45.4
hromic sulfate	C	1,000 (454)	Mercuric cyanide	_ X	1 (0.454
hromous chloride	C	1,000 (454)	Mercuric nitrate	- A	10 (4.54
obaltous bromide	·C	1,000 (454)	Mercuric sulfate	. A	10 (4.54
obaltous formate	C	1,000 (454)	Mercuric thiocyanate	- A	10 (4.54
obatious sulfamate	C	1,000 (454)	Mercurous nitrate	. A .	
ournaphos	. A ·	. : 10 (4.54)		_ X · :	1 (0.454
resol	C	1,000 (454)	Methyl mercaptan	. B	100 (45.4
rctonal dehyde	8	100 (45.4)	Methyl methacrylate	-	5,000 (2,270
upric acetate		100 (45.4)	Metryl parathon	B	
upric acetoarsenite		- 100 (45.4)	Mevinphos	x	100 (45.4)
upric chloride	A	10 (4.54)			
	· B ·		Mexacarbate	- 0	1,000 (454)
Apric nitrate	D .	100 (45.4)	Monoethylamine	. C	1,000 (454)

Material	Category	RQ in pounds (ralograms)
Acutaidolydo	_ с	. 1,000 (454)
Acesc acd		. 1,000 (454)
Acetoc anhydrode	_ c	1,000 (454)
Acctone cyanohydnn	_ A	10 (4.54)
ceryl bromide	D	5,000 (2,270)
loom chlonda	_ D	5,000 (2,270)
crolon		1 (0.454)
Laytonsole	В	100 (45.4)
labe sod	_ D	5,000 (2,270)
מלא	_ x.	1 (0.454)
Ulyl alcohol	B	100 (45.4)
Ly chlorus	_ c	1,000 (454)
Juminum sustate	_ D	- 5,000 (2,270)
mmona	B	100 (45.4)
mmonum acetate	_ D.	5,000 (2,270)
etcorrod muromen	_ D	5,000 (2,270)
mmonum bicarbonale	_ D	5,000 (2,270)
renoraum bichromate	_ C	1,000 (454)
monum bifuondo	_ D	.5,000 (2,270)
ranonum bisustite	D	5,000 (2,270)
mmonum carbamate	D	5,000 (2,270)
mmorsum carbona's	_ D	5,000 (2,270)
mmonum chiondn		5,000 (2,270)
mmonum chromate		. 1,000 (454)
mmonum otate	D	5,000 (2,270)
שבים פוניסטטניה ודעייסטיייה		5,000 (2,270)
mmonum munonum		5,000 (2,270)
mmonum hydraxide		1,000 (454)
MINOR PREMIORE		5,000 (2,270)
פלחתנות ביים ותנוחסותו		1,000 (454)
		5,000 (2,270)
ביים מויינים הגייוסחות		5,000 (2,270)
שלנום ותויחסחים		5,000 (2,270)
שומש חשיים		5,000 (2,270)
TOTAL CHOCK PROTECTOR		5,000 (2,270)
morem troudate		5,000 (2,270)
nyl acutate	_ C	1,000 (454)
2400	_ C	1,000 (454)
bmory puntactionals	_ C	1,000 (454)

§ 117.3 Determination of reportable quantities.

The quantity listed with each substance in Table 117.3 is determined

Table 117.3—Reportable Quantities of Hazardous Substances

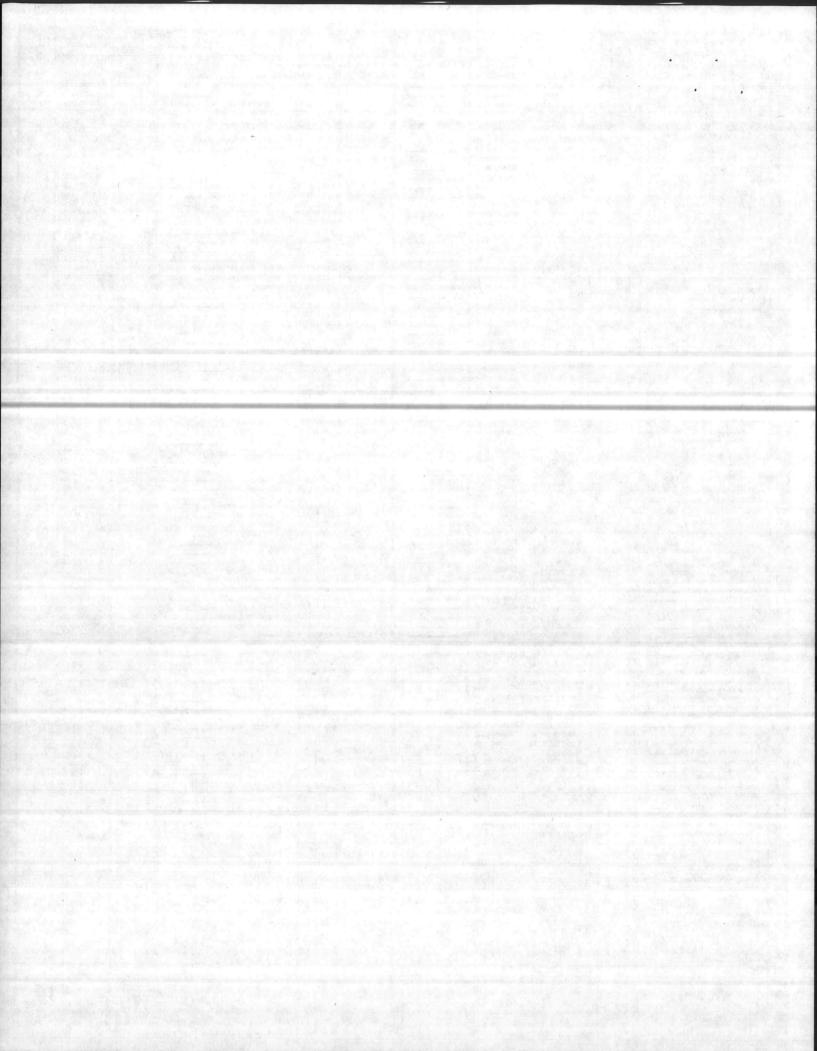
Note.—The first number under the column headed "RQ" is the reportable quantity in pounds. The number in parentheses is the metric equivalent in kilograms. For

convenience, the table contains a column headed "Category" which lists the code. letters "X", "A", "B", "C" and "D" associated with reportable quantities of 1, 10, 100, 1000

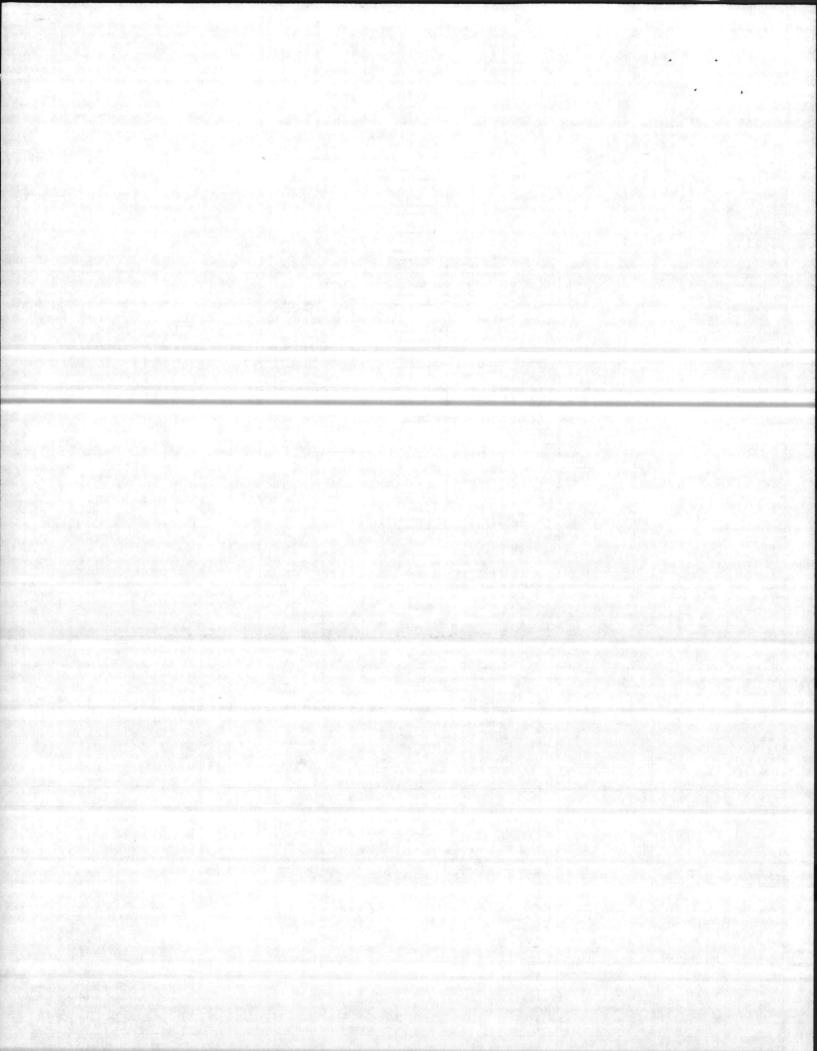
to be the reportable quantity for that substance.

. substance.

Chlorosulfonic acid	. C	1,000 (454)	Maleic acid	. D	-5,000 (2,270)	
Chromic acetate	C	1,000 (454)	Maleic scid	D	5,000 (2,270)	
Chromic acid	C	1,000 (454)	Mercaptocimetrur	B .	100 (45.4)	
Chromic acid Chromic sulfate	.C	1,000 (454)	Mercuric cyanide	X	1 (D 454)	
Chromous chloride	C	1,000 (454)	Mercuric nitrate	A	10 (4.54)	
Codalibus bromide	.C	1.000 (454)	Mercuric nitrate	A -	10 (4.54)	-
Cobaltous formate	·C	1 000 (454)	Marcuric thiocyanate	A	10 (4 54)	
Cobattous sulfamate	C	1 1 000 (454)	Mercuric thiocyanate	A .	10 (4 54)	
Cournaphos		10 (4.54)	Methoxychlor	x .	1 1 (0.454)	
Cresol	C	1,000 (454)	Methyl mercaptan	B	100 (45.4)	
Crctonal dehyde	B	100 (45.4)	Methyl methacrylate	D	5 000 (2 270)	
Cupric acetate	B	100 (45.4)	Methyl parathion	R	100 (45.4)	
Cuoric acetoarsenite	B	100 (45.4)	Meyinghas	Y.	1 (0.454)	
Quoric chlorida	Ā	.10 (4 54)				
Cupric chloride	· B	100 (45.4)	Mexacarbate Monoethylarrine	C.	F. 4 000 11F1	
Cupric oxalate	B	100 (45.4)	Monomethylamine	C	1,000 (454)	
Omic millate		. 40 /4 CA	· Naled		. 1,000 (454)	
Oupric sulfate ammoniated		100 (45.4)	Naphthalene	. ^	10 (4.54)	
Capric tartrate	8	100 (45.4)			5,000 (2,270)	
Cupric tartrate Cyanogen chloride	A	100 (45.4)	Nickel ammonium sulfate	8 .	100 (45.4)	
Orlohevana	6	10 (4.54)	Mickel chlorida		5,000 (2,270)	
Cyanogen chloride	6	100 (454)	Nickel chloride	D		
2.4-0 Esters	0	100 (45.4)	Nickel hydroxide	C	- 1,000 (454)	
DOT			Nickel nitrate	D	5,000 (2,270)	
DDT	x		Nickel sulfate		5,000 (2,270)	
			Nitric acid	·C	. 1,000 (454)	
Dicamba		1,000 (454)	Nitrobenzeno	C	1,000 (454)	
Dichlobenil		1,000 (454)	Nitrogen diaxide	C	1,000 (454)	
		1 (0.454)	Nitrophenol	C	1,000 (454)	
Dichlorobenzene	В	100 (45.4)	Nitrotoluene	C	1,000 (454)	
Dichloropropane		5,000 (2,270)	Paraformaldehyde		1,000 (454)	
Dichloropropene	D	5,000 (2,270)	Parathion	X -	1 (0.454)	
CHOICO CON COPOLING	D	5,000 (2,270)	Pentschlorophenol	A	10 (4.54)	
Dichloropropane Mixture.			Phonol	C	1,000 (454)	
2,2-Dichloropropionic scid		5,000 (2,270)	Phosgone	D	5,000 (2,270)	
Dichlorvos		10 (4.54)	Phosphoric acid		5,000 (2,270)	
Diektrin	X	1 (0.454)	Phosphorus		1 (0.454)	•
Diethylamine		1,000 (454)	Phosphorus oxychloride		5,000 (2,270).	
Dimethylamine		1,000 (454)	Phosphorus pentasulfide	B	100 (45.4)	
Dinitrobenzone		1,000 (454)	Phosphorus trichloride	D .	5,000 (2,270)	
Dinitrophenol		1,000 (454)	Polychlorinated bipherryls	A	1 10 (4.54)	
Dinitrotoluone		. 1,000 (454)	Potassium arsenate	C	1,000 (454)	
Diquat	C '	1,000 (454)	Potassium ersenite	C	1,000 (454)	
Disuffoton	Χ.	1 (0.454)	Potassium bichromate		1,000 (454)	
Diuron	В	- 100 (45.4)	Potassium chromate	Č	1,000 (454)	
Dodecylbenzenesuitonic acid	C	1,000 (454)	polassum cyanide	_	10 (4.54)	
Endosuitan	×	1 (0.454)	Polassum hydroxide	c	1000(454)	
Endrin	X	. 1 (0.454)	Potassum permanganate	В	100 (45.4)	



Material	Category	RQ in pounds
and the Control		(kilograms)
Propargite	. A	10 (4.54
Propionic acid	. D	6,000 (2,270
Propionic annyonos	. 0	6,000 (2,270
Propylene oxida	. D	5,000 (2,270
Pyrethms	. C	1,000 (454
Ouinoline Resorcinal	. C	1,000 (454
Selenium ovide	Č	1,000 (454
Selenium oxide		1,000 (454
Sodium	. č	1,000 (454)
Sodium arsonate	Č	1,000 (454
Sodium arsenite	. C	1,000 (454
Sodium arsenite	C	1,000 (454
Sodum bifluoride	. D .	5.000 (2.270)
Sodium bisulfite	. 0	5.000 (2.270)
Sodum chromate	. C	1,000 (454)
Sodium cyanide	. A	10 (4.54)
Sodium	C	1,000 (454)
. dodecylbenzenesulfonate. Sodium fluonde	D	5,000 (2,270)
Sodium hydrosulfide		5,000 (2,270)
Sodium hydroxide	C	1,000 (454)
Sodium hypochlorite		100 (45.4)
Sodium methylate	C .	1,000 (454)
Sodium nitrite	B .	100 (45.4)
Sodium phosphate, dibasic		5,000 (2,270)
Socium phosphate, tribasic	D	5,000 (2,270)
Sodium sclenite	C	1,000 (454)
Strontium chromate	C	1,000 (454)
Strychnine	A	10 (4.54)
Styrene	C	1,000 (454)
Sulfuric acid	C	1,000 (454)
Sulfur monochloride		1,000 (454)
2,4,5-T acid	B	100 (45.4)
2,4,5-T amines	В	100 (45.4)
2,4,5-T esters	B	100 (45.4)
2,4,5-T saits	B	100 (45.4)
2,4,5-TP acid	B	100 (45.4)
7.4.5-TP acid esters	B	100 (45.4)
DE	X	1 (0.454)
Tetraethyl lead	В	100 (45.4)
engenili hlichiochisma	В .	100 (45.4)
hallom sulfate	C	1,000 (454)
oluene	č	1,000 (454)
ovaphene	X	1 (0.454)
nchloroethylene	C .	1,000 (454)
nchloroethyiene	C	1,000 (454)
richlorophenol	A .	10 (4.54)
dodecyfbenzenesulfonate,	C	-1,000 (454)
	D	E 000 (0 070)
nethylamine	C	5,000 (2,270)
ranyl acetate	Ď	1,000 (454)
ramed meteoda	-	5,000 (2,270)
anadium pentoxide	C	5,000 (2,270)
anada sullate	Č	1,000 (454)
anadyl sullate	CCD	1,000 (454)
inylidene chloride	n	1,000 (454) 5,000 (2,270)
viene	c	
yleneylenol	Č.	1,000 (454)
nc acetate	Č	
nc ammonium chloride	n	1,000 (454)
nc borate	c	1,000 (2,270)
nc bromide	D.	5,000 (2,270)
nc carbonate	C	1,000 (454)
ne chlorida	C	6,000 (2,270)
nc cyanide	A	10 (4.54)
nc fluoride	CC	1,000 (454)
nc formate	C	1,000 (454)
nc hydrosulfite	C	1,000 (454)
nc nitrate	D	5,000 (2,270)
nc phenoisulionate	D	5,000 (2,270)
ne phosphide	C	1,000 (454)
ne silicoffuonde	D	5,000 (2,270)
c sulfate	C	1,000 (454)
con-um nitrate	D	5,000 (2,270)
conium potassium fluoride	D	5,000 (2,270)
conum sullate	D	5,000 (2,270)
conium tetrachlorido		



§ 401.15 Toxic

The following comprise the list of toxic pollutants designated pursuant to section 307(a)(1) of the Act:

- 1. Acenaphthene
- 2. Acrolein Water and Late and Additional

- 2. Acrolein
 3. Acrylonitrile
 4. Aldrin/Dieldrin
 5. Antimony and compounds
 6. Arsenic and compounds
 7. Asbestos
 8. Benzene
 9. Benzidine
 10. Beryllium and compounds
 11. Cadmium and compounds
 12. Carbon tetrachloride
 13. Chlordane (technical mixture and 13. Chlordane (technical mixture and
- metabolites)

 14. Chlorinated benzenes (o her than dichlorobenzenes)

 15. Chlorinated ethanes (including 1,2dichloroethane, 1.1,1-trichloroethanc, and
- hexachloroethane)
- chloroethyl, and mixed ethers)
- 17. Chlorinated naphthalene
 18. Chlorinated phenols (other than those listed elsewhere; includes
- trichlorophenols and chlorinated cresols) 19. Chloroform
 20. 2-chlorophenol
 21. Chromium and compounds

- 22. Copper and compounds
- 23. Cyanides
- 23. Cyanides
 24. DDT and metabolites
- 25. Dichlorobenzenes (1,2-, 1,3-, and 1.4dichlorobenzenes)
 26. Dichlorobenzidine
- 27. Dichloroethylenes (1,1-, and 1,2-
- · dichloroethylene)
- 28. 2.4-dichlorophenol
- 29. Dichloropropane and dichloropropene
- 30. 2.4 dimethylphenol
 31. Dinitrotoluene
 32. Diphenylhydrazine
- 33. Endosulfan and metabolites
- 34. Endrin and metabolites*
- 35. Ethylbenzene
- 36. Fluoranthene
- 37. Haloethers (other than those listed elsewhere; includes chlorophenylphenyl ethers, bromophenylphenyl ether. ... bis(dichloroisopropyl) ether, bis-(chloroethoxy) methane and polychlorinated diphenyl ethers)
- 38. Halomethanes (other than those listed elsewhere; includes methylene chloride. methylchloride, methylbromide, bromoform, dichlorebromomethane.

trichlorefluoremethene.

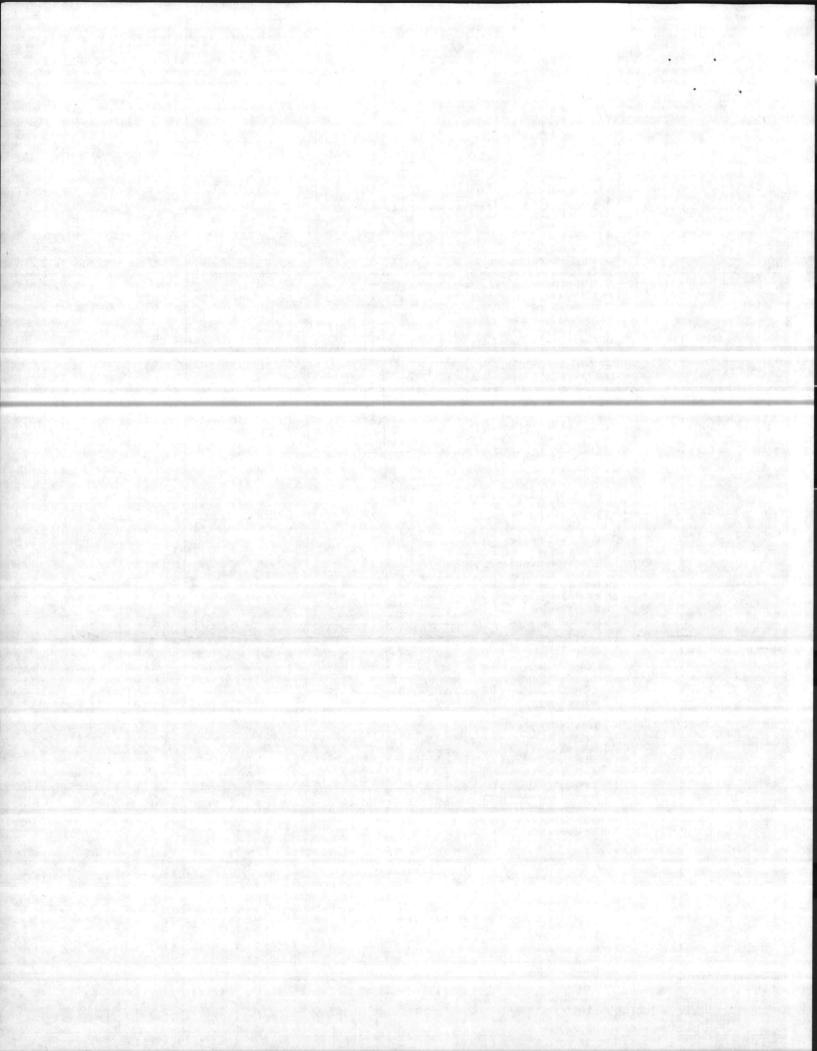
- 39. Heptachlor and metabolites
- 40. Hexachlorobutadiene
- 41. Hexachlorocyclohexane.
- 42. Hexachlorocyclopentadiene
- 43. Isophorone
- 44. Lead and compounds
- 45. Mercury and compounds
- 46. Naphthalene
- 47. Nickel and compounds
- 48. Nitrobenzene
- 49. Nitrophenols (including 2.4-dinitrophenol. dinitrocresol
- 50. Nitrosamines
- 51. Pentachlorophenol
- 52. Phenol

- 53. Phthalate esters
- mirali was bli me 54. Polychlorinated biphenyls (PCBs)*
- 55. Polynuclear aromatic hydrocarbons (including benzanthracenes,
 - benzopyrenes, benzofluoranthene, chrysenes, dibenzanthracenes, and indenopyrenes)

 - 56. Selenium and compounds
 57. Silver and compounds
 58. 2,3,7,8-tetrachlorodibenzo-p-dioxin

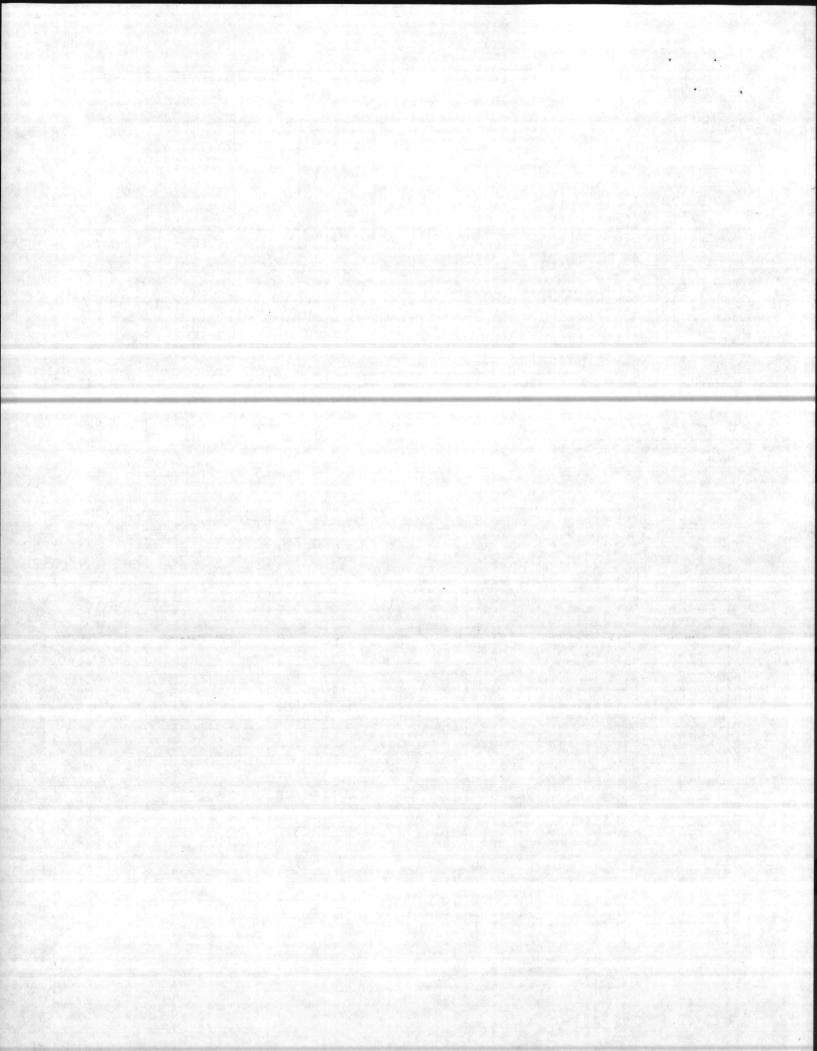
 - 59. Tetrachloroethylene
 - 60. Thallium and compounds

 - 61. Toluene
 62. Toxaphene
 63. Trichloroethylene
 64. Vinyl chloride
 65. Zinc and compounds



enenc:		
F001	The following spent halogenated solvents used in degressing: tetrachloroethylene, trichloroethylene, methylene chloride, 1.1,1-trichloroeth- ane, carbon tetrachloride, and chlorinated fluorocarbons; and studges from the recovery of these solvents in degressing operations.	
F002	The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1_trichloroethane, chlorobenzene, 1,1_trichloroethane, ortho-dichlorobenzene, and trichlorofluoromethane; and the still bottoms from the recovery of these solvents.	
F093	The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-butyl (I) alcohol, cyclohexanone, and methanol, and the still bottoms from the recovery of these solvents.	
F004	The following spent non-halogenated solvents: cresols and cresylic acid, and nitrobenzene; and the still bottoms from the recovery of these (T) solvents.	
F005	The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, and pyridine; and the still bottoms (I.) from the recovery of these solvents.	n
F006	Wastewater treatment studges from electroplating operations except from the following processes: (1) sulfuric acid anodizing of aluminum; (1) (2) In plating on carbon steet; (3) zinc plating (segregated basis) on carbon steet; (4) aluminum or zinc-aluminum plating on carbon steet; (5) cleaning/stripping associated with tin, zinc and aluminum plating on carbon steet; and (6) chemical etching and milling of aluminum.	
F019	Wastewater treatment studges from the chemical conversion coating of aluminum	1
F007	Spent cyanide plating bath solutions from electroplating operations (except for precious metals electroplating spent cyanide plating bath (R, solutions).	
F008	Plating bath sludges from the bottom of plating baths from electroplating operations where cyanides are used in the process (except for (R.	η :
F009	Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process (except for precious "R,	ח
F010	- metals electroplating spent stripping and cleaning bath solutions). Ouenching bath studge from oil baths from metal h at treating operations where cyanides are used in the process (except for precious (R.	Ti
F011	metals heat-treating guenching bath sludges).	
- FULL STATE OF STATE	Spent cyanido solutions from salt bath pot cleaning from metal heat treating operations (except for precious metals heat treating spent (R. cyanide solutions from salt bath pot cleaning).	1)
F012	Ovencturing wastewater treatment studges from metal heat treating operations where cyanides are used in the process (except for precious. (T)	12/5/5
FOLA	motals heat treating quenching wastewater treatment sludges). Opplied to a wastewater treatment taking pond pediment from concept motals recovery operations.	
F016	Sport cyanida bath solutions from minorel motals recovery sparations	n
	 Zin Vita in a constitution altresi finisi de l'apparate del riche de l'apparate per l'apparate de l'a	214

	Hazardous waste Hazardous waste Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol. Wastewater treatment sludge from the production of chrome yellow and orange pigments
ood Preservations	
K001	Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosole and/or pentachlorophenol
organic Pigments:	the state of the s
K002	Wastewater treatment sludge from the production of chrome yellow and orange pigments Wastewater treatment sludge from the production of molybdate orange pigments Wastewater treatment sludge from the production of zinc yellow pigments Wastewater treatment sludge from the production of chrome green pigments
K003	Wastewater treatment sludge from the production of molybdate orange pigments
· K004	Wastewater treatment studge from the production of zinc yellow pigments.
: K005	Wastewater treatment sludge from the production of chrome green pigments
K206	Wastewater treatment studge from the production of chrome oxide green pigments (anhydrous and hydrated)
MOOR	
K000	Oven residue from the production of chrome oxide green plaments
ganic Chemicals:	Distillation bottoms from the production of acetaldehyde from ethylene
K009 .	Distillation bottoms from the production of acetaldehyde from ethylene
K010	Distillation side cuts from the production of acetaldehyde from ethylane
K011	Bottom straam from the unstangles strange in the medicalism of conductation
KU13	Hottom stroam from the aceteotrile column is the medication of aceteotrile
K014	Bolloms from the acateginal a willington column to the production of application
.K015	Bottoms from the acetonitrile purification column in the production of acrylonitrile Still bottoms from the distillation of benzyl chloride.
K016	Heavy ends or distillation residues from the production of carbon tetrachloride
K017	Heavy ends or distillation residues from the production of carbon tetrachloride
. NO.8	Heavy ends or distillation residues from the production of cubon tetrachloride Heavy ends (still bottoms) from the purification column in the production of epichlorohydrin Heavy ends from the fractionation column in ethyl chloride production.
- VA10	Heavy ones from the ascuonation column in etrys chloride production.
. K019	Heavy ends from the distillation of ethylene dichloride in ethylene dichloride production.
F.U2U	Heavy onds from the distillation of vinyl chloride in vinyl chloride monomer production Aquoous spent antimony catalyst waste from fluoromethanes production
F.021	Aquoous spent antimony catalyst waste from fluoromethanes production
K022	Distribution bottom tars from the production of phenol/acetone from currene.
KC23	Distriction light ends from the production of phthalic anhydride from naphthalene
K024	Distrilation light ends from the production of phthalic anhydride from naphthalene Distrilation bottoms from the production of phthalic anhydride from naphthalene
K033	Distribution light ends from the production of chihalic anhydride from ortho-xylene
KC04	Distribution bottoms from the production of phthalic anhydride from ortho-sylene
K026	Stripping still tails from the production of methy ethyl pyridines
K027	Contribute and distillation residues from toluene discovanate production
K028	Spont catalyst from the hydrochlorinator reactor in the production of 1.1.1-trichloroethane
KD29	Waste from the gradual steam stripper in the production of 1.1.1 triphlerosthane
KQ35	Distrillation bottoms from the production of 1.1.1-trichloroethage.
K.096	Heavy ends from the heavy ends column from the production of 1.1.1-trichlorgethane
KC30	Column bottoms or heavy ends from the combined production of trichloroethylene and perchloroethylene
KC83	Distillation bottoms from aniline production
K.1G3	Process are duce from antime extraction from the production of aciting
K194	Combined wastewater sugarns generated from nitrobenzenu/aniline production
Y.CES	— Ostutation or fractionation column bottoms from the production of chlorobenzenes
K105	Separated aqueous stream from the reactor product washing step in the production of chlorobenzenos
rganic Chemicals:	Separated address seem now we reduce washing step in the production of chorcoenzenes
	Brine purification muds from the mercury cell process in chlorine production, where separately prepurified brine is not used
F.3/3	Chlorinated budges than waste from the out firstion step of the disphasin cell process using graphic and the process using graphic and the process waste from the process of the process waste and the process waste from the process
K165	Wastewater treatment studge from the mercury cell process in chlorine production
dicides:	- This towards treatment stoods what the mercury can process in chlorida processor.
	Business and the conduction of MSMA and conduction and
K032	
K033	- Wastewater treatment studge from the production of chlordane
K035	Vacuum stripper discharge from the chlordane colorizate in the production of chlordane
K036	Wastiwater treatment studges generated in the production of creesels Still bettoms from tokane gestamaten distillation in the production of creesels. Still bettoms from tokane gestamaten distillation in the production of creesels.
K032	Still bottoms from toluene reclamation distillation in the production of distillation. Wastewater treatment studges generated in the production of distillation.
Kose	Wastewater from toluene reclamation distillation in the production of disulfoton
K0.13	Wastewater from the washing and stripping of phorate production.
F.O. J	Fiter cake from the Mashing and stripping of phorate production. Fiter cake from the filtration of diethylphosphorodithioid and in the production of phorate. Wastewater treatment studge from the production of phorate.



1081 see P057

1-Acetyl-2-thiourea

Agarın see P007

Aldicarb see P069

Alditen see P048

Acrosan GN 5 sea Pogo

Acrolain

P001

P002

(Acotato)phenylmercury see P092

3-(alpha-Acetonylbenzyl)-4-hydroxycoumann

Acetone cyanohydrin seo P069

commercial chemical product or

manufacturing chemical intermediate

with the container, has been removed.

water or other debris resulting from the

cleanup of a spill, into or on any land or

water, of any commercial chemical

product or manufacturing chemical

(d) Any residue or contaminated soil.

P023

P024

P025

P026

P027

P028

P029

Chloroacetaldehyde

(p-Chlorobenzayl)

-(o-Chlorophenyl)this

3-Chloropropionitnle

alpha-Chlorotoluene

CRETOX see P108

Coumadin see POOT

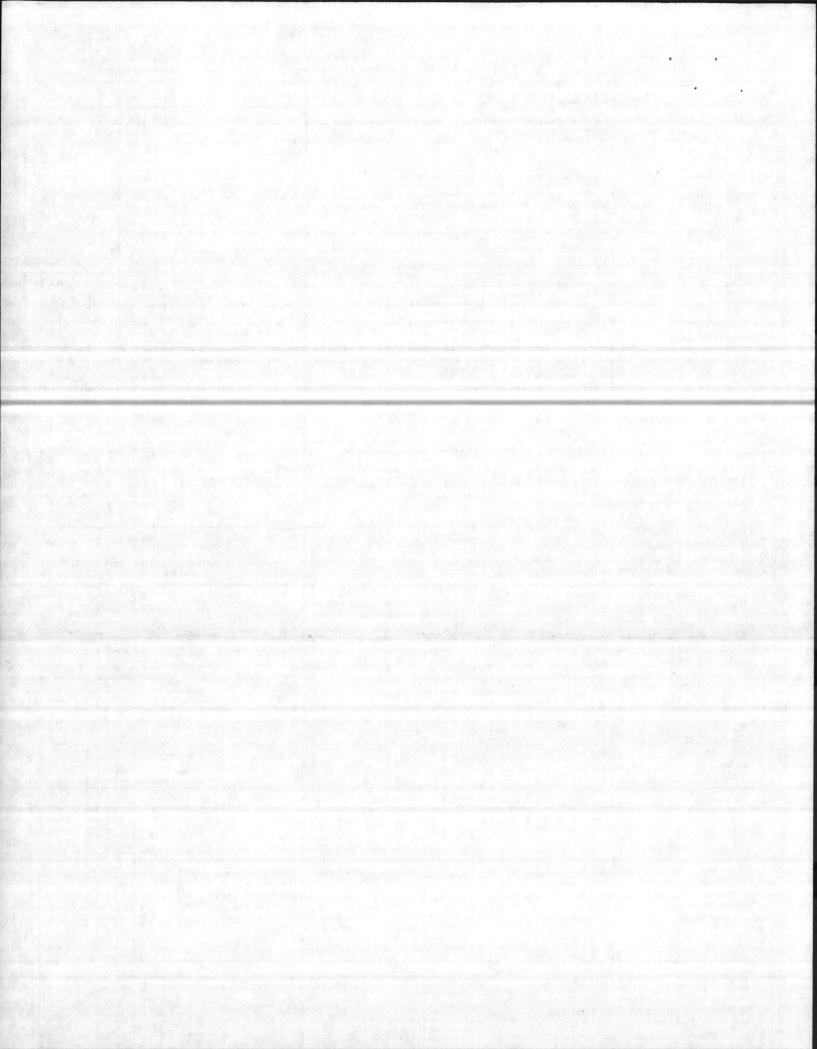
Coumaten see P001

p-Chloroaniline

acetic acid

Copper cyanide

Cyanides



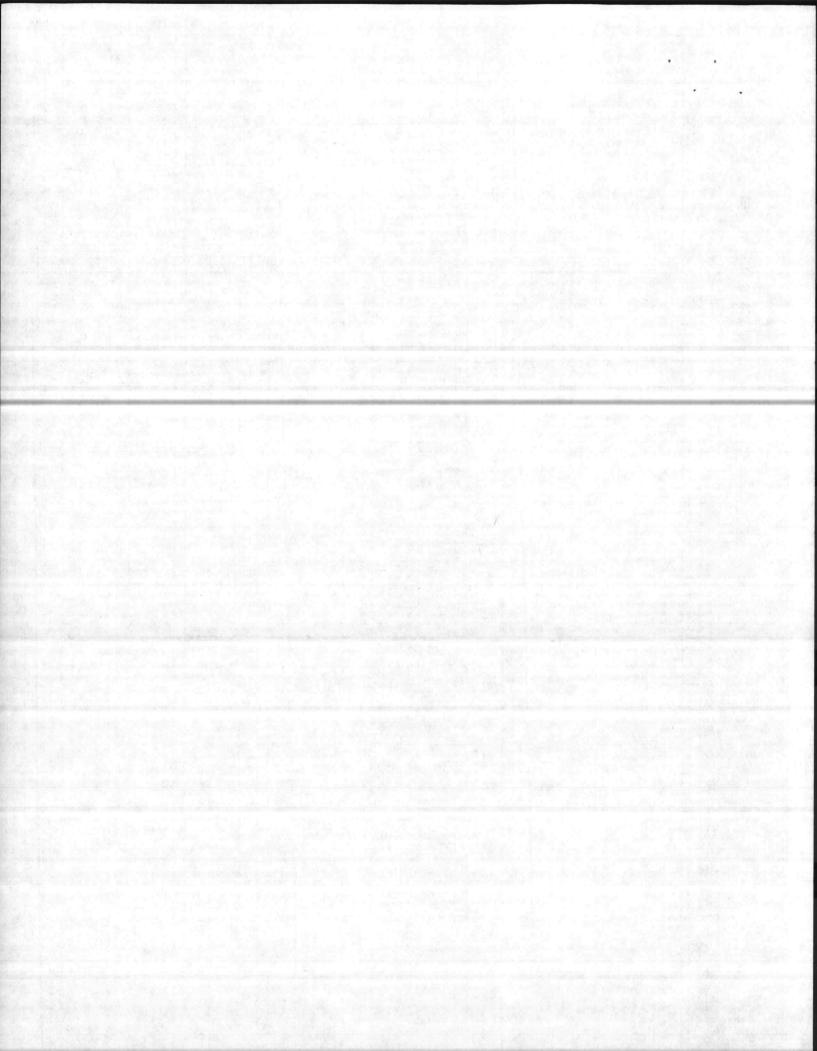
(f) The commercial chemical products or manufacturing chemical intermediates, referred to in paragraphs (a). (b) and (d) of this section, are identified as toxic wastes (T) unless otherwise designated and are subject to the small quantity exclusion defined in § 261.5 (a) and (b). These wastes and their corresponding EPA Hazardous Waste Numbers are:

Waste No.	Substance!
· · · · · · · · · · · · · · · · · · ·	AF see Uoo5 cetaldehyde cctone (I) cetontnie (I,T) cetophenone Acotylaminoflourene cetyl chloride (C,T)
U001 A	cetaldehyde
. U002 A	cetone (I)
. U004 A	cetonitrie (I,T)
: U005 2	Academical
. UCO6 A	cetyl chioride (C,T)
	crylamide
A	elylene tetrachloride see U209
A	cerylene tetrachloride see U209 cerylene trichloride see U228 cryles acid (I)
: U008 A	crylic scid (I)
. U009 Ad	ROTHENE TT see U226
	ROTHENE TT see U226
	Amino-5-(p-acetamidophenyl)-1H-1,2,4-triazole, hydrate see U011
U010 6-	Ammo-1,1a,2,8,8a,8b-hexahydro-8
	(hydroxymethylid-methoxy-5-methylcarbamate
	221mo(2,3'.3,4) pyrrolo(1,2-a) indole-4. 7-dione
	(oster)
U011 An	(oster) ntrole sino (I)
U012 An	alino (I)
U013 As	costos ramine
U014 Az	ramine asenne
	nz(c)acridine
U017 Be	asenne nz(c)acridine nzal chlonde
U018 Be	nz[a]anthracene
U019 Be	nz(c)acridino nz(a)anthracene nzeno
D41	Letresultony chonoe (C.R)
1,2	Benzisothiazolin-3-ono, 1,1-dioxide see U202 zola lanthracene see U018 zola lpyrene zola lpyrene zouchłody (C.R.T) (2-chlorocthoxy)methane (2-chlorocthy) othor
11022 801	volalanthracene see U018
U023 Ber	Cotalpyrene
U024 Pa	2 chlorothodimethan
U025 Brs	2-chloroethyll other
U027 Bis	2-chloro(socronyl) other
U025 B.s	2-einy/hery!) phinalate
U029 Bro	
C031 n-Bi	umophenyl phenyl einer
U032 Cak	and a cohol (I)
Carl	oric and son titles
Cart	con letrachionda sea 11211
Carl	
U034 Chic	val
U035 Chic	vambuel
U036 Chic	rdane robenzene
U038 Cnic	coervene
U039 DC	loro-m-cresol
U040 Cho	rec bromemethane
U041 1-Ch	oro-2,3-coorprepane
CHL	CROETHENE NILL see 11228
U042 Cr.10	roethyl vinyl other
U043 Chio	rocthene
U244 Chio	o'o'm (I,I)
U045 Chio	romethane (I,T)
U047 2 Ch	ometryl methyl ether
U048 2-Cr.	crongoninalene
11.740	
עטנט כניין	sone
CI. 2	30:00 see U073 · ·
U051 Ces	ote
U052 Cres	013
UOSO Croto	na'dehyde
U054 Cure	c acd
C-10	Constitute of the constitution of the constitu
Taring Cacici	20300 (1)
13/ Cestat	Princes III
TACIO	no consenses
Csuno	mycin .
C30	발동생 그렇지 깨뜨린 (Balk) (1991년 - 1992년 -

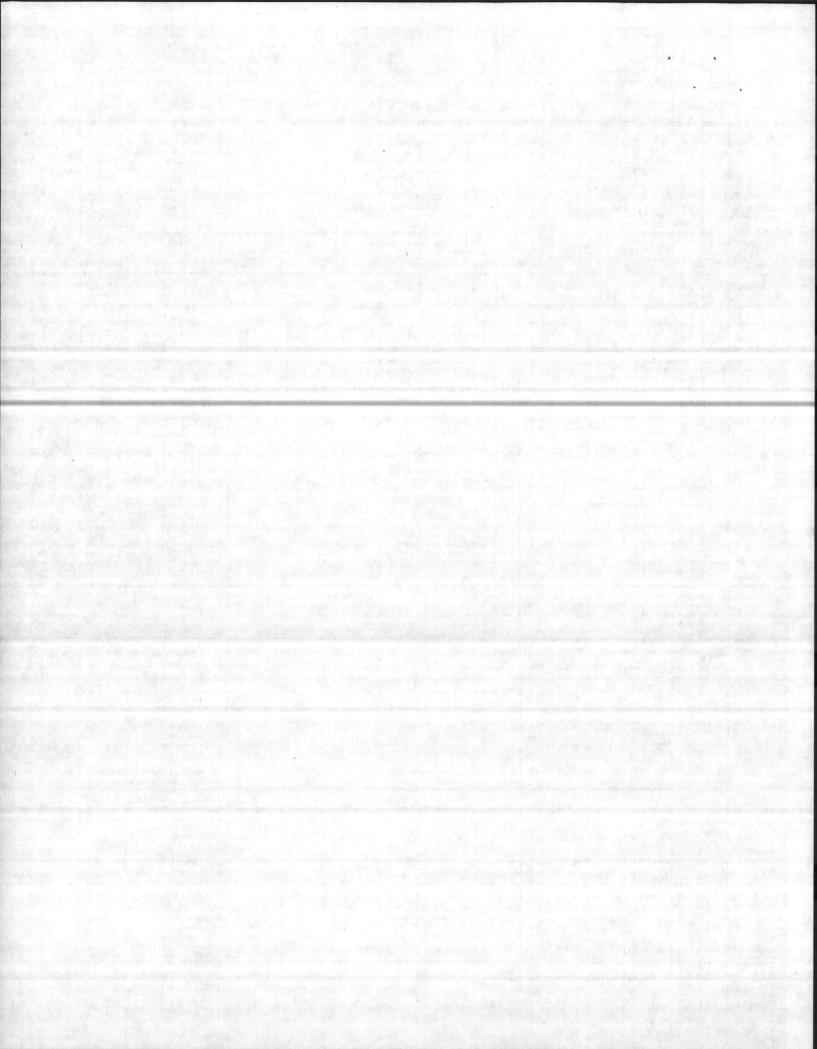
	_
Hazardous Substance Substance	
Hore por	- 1
UC62 Diallate	
U063 Dibenz[a,h]anthracene Dibenzo[a,h]anthracene see U063	
U064 Dibenzo(a.i)pyrene	1
U065	-
U066 1,2-Dibromo-3-chloropropane	ी
U068 Dibromomethane	
U068. Dibromomethans U069. Di-n-butyl phthalate U070. 1,2-Dichlorobenzens U071. 1,3-Dichlorobenzens	
U069	
1,3-Dichlorobenzene	- 1
U073 3.3'-Dichlorobenzidine	
Total Tar Diction - 2-Dulene	
U075 Dichlorodifluoromethane U078 1,1-Dichloroethane U077 1,2-Dichloroethane U078 1,1-Dichloroethylene U079 1,2-trans-dichloroethylene U080 Dichloromethane	-
U077 1.2-Dichloroethane	
U078 1,1-Dichloroethylene	1-1
U079 1,2-trans-dichloroethyle ie	5
U080 Dichloromethane Dichloromethylbenzene see U017 U081 24-Dichlorophenol	
U081 2.4-Dichlorophenol	1
U082 2,6-Dichlorophenol	3
U083 1,2-Dichloropropane	!
UC85 Diecovolutane (LT)	5
U086 1.2-Diethylhydrazine	
U080 Dichloromethane Dichloromethane Dichloromethane Dichloromethane Dichloromethane 2.4-Dichlorophenol U082 2.5-Dichlorophenol U083 1.2-Dichlorophenol U084 1.3-Dichloropropane U084 1.3-Dichloropropane U085 Diepoxybutane (I,T) U086 1.2-Diethylhydrazine U087 0.0-Diethyl-S-methyl ester of phosphorodithioic acid U088 Diethyl phthalate U089 Diethylstilbestrol U090 Dihydrosafrole U091 3.3-Dimethylsparidine U092 Dimethylamine (I) U093 7.12-Dimethylbernzidine U094 7,12-Dimethylbernzidine U095 3.3-Dimethylbernzidine	1
tions and	: 1
U089 Diethylstilhestrol	1
U090 Dihydrosalrole	
U091 3,3'-Dimethoxybenzidine	
U092 Dimethylamine (I)	
U094 7 12 Dimethylaminoazobenzene	1
U095 3,3'-Dimethylbenzidine	1
U094	li
U097. Dimethylarbamoyl chloride U098. 1,1-Dimethylarbamoyl chloride U099. 1,2-Dimethylhydrazine U100. Dimethylnitrosoamine U101. 24-Dimethylarbamol	11
11099 1.2 Dimethylaydrazine	1
U100 Dimethylnitrospamine	1
U101 Dimethylnitrosoamine U101 2,4-Dimethylphenol U102 Dimethyl phthalate	li
U102 Dimethyl phthalate	lu
U103	U
U105 2,4-Dinitrotoluene	U
U106 2,6-Dinitrotoluene	1
U107 Di-n-octyl phthalate	U
1010	U
U110 Dipropylamine (I)	Ü
U111 Di-n-propylnitrosamine	1
U111 Di-n-propyinitrosamine EBDC see U114 1.4-Epoxybutane see U213	1
U112 Fithyl acetate (I)	U
U112. Ethyl acetate (I) U113. Ethyl acrylate (I) U114. Ethylenebisdithicarbamate	U
U114 Ethylenebisdithiocarbamate	U
	U
U116 Ethylene thiourea U117 Ethyl ether (I,T)	U
U113 Ethylmethacrylate U119 Ethyl methanesulfonate	U
U119 Ethyl methanesulfonate	U
	UI
Firemaster T23P see U235 U120Fluoranthene	U2
J120	U2
J122 Formaldehyde	U2
J123 Formic acid (C,T)	U2
1125 Furfural (I)	U2
	U2
J127 Hexachlorobenzene	
nexachiprobutadiene	U2
1130 Hevachlorocyclopeotadiaca	U2
1131 Hexachloroethane	U2
132 Hexachiorophene	
1133 Hydrazine (R,T)	U2
1134 Hydrofluoric acid (C,T)	U2
Hydrogen suifide Hydroxybenzene sea U188	U21
135 Hydroxydimethyl arsine oxide	U21
4,4'-(Imidocarbonyl)bis(N,N-dimethyl)aniline see	U21
U014	U21
137 Indeno(1,2,3-cd)pyrene	U21
1000methans	U22
139 Iron Dextran	U22

-	
	in inches
,	Hazardous Substance Waste No.
	waste No.
	U141 Isosafrole
	IIIA2 Vanne . Same
-	U143 Lasiocarpine
1	U144 Lead acetate U145 Lead phosphate
	U145 Lead phosphate
	U146Lead phosphate U147Maleic anhydride
	U149 Malononitrile
	MEK Peroxide see U160
1	U150 Melphalan U151 Mercury
	U151 Mercury U152 Methacrylonitrile U153 Methanethiol U154 Methapyrilene Methapyrilene Methapyrilene Methapyrilene
	U153 Methanethiol
1	U154 Methanol
1	U155 Methapyrilene
	Wethyl alcohol see U154 U156 Methyl chlorocarbonate Methyl chloroform see U256 U157 3-Methylchlanthren
٠	Methyl chloroform see 1226
1	U1573-Methylcholanthrena Methyl chloroformate see 1156
-	Methyl chloroformate see 11156
1	U158
1	U160 Methyl ethyl ketone persyde (D)
1	
1	
1	U162 Methyl methacrylate (P.T) U163 N-Methyl-N-nitro-N-nitrosoguanidine
1	U164 Methylthiouracil
ŀ	Mitomycin C see Unio
1	U165Naphthalene
ı	U167 1-Naphthylamine
	U168 2-Naphthylamine U169 Nitrobenzene (LT) Nitrobenzel see U169 U170 4-Nitrophenol
ı	Nitrobenzol see U169
1	U170
Ľ	U171 2-Nitropropane (I)
ľ	U171
li	U174 N-Nitrosodiethylamine
1	U175 N-Nitrosodi-n-propylamane
1	0172 N-Nitrosodi-n-butylamine 0173 N-Nitrosodiethanolamine 0174 N-Nitrosodiethylamine 0175 N-Nitrosodi-n-propylamine 0176 N-Nitrosod-n-propylamine 0176 N-Nitrosod-n-ethylurea
1	N-Nitroso-n-methylurea
i	U177. N.Nitroson-rethylurea U178. N.Nitroson-methylurea U179. N.Nitroson-methylurethane U179. N.Nitrosopyrrolidine U180. N.Nitrosopyrrolidine
ı	1179 N-Nitrosopiperidine 1180 N-Nitrosopyrrolidine 1181 S-Nitro-o-toluidine 1182 Paraldehyde PCNB see U185 1183 Pentachlorobenzene
1	J181 5-Nitro-o-toluidine
	J182 Paraldehyde
ı	J183 Pentachlorobossos
U	1184
U	1,5-Ferriddieria (1)
U	Percharathyrena see UZ10 Phenacetin Phenol Phosphorous sulfide (R) Phthalic anhydride
U	188 Phenol
U	189 Phosphorous sulfide (R)
ŭ	192 Pronamide
U	192. Pronamide 193. 1,3-Propane sultone 194. p-Propylamine (I)
וו	
U	200 Reserpine
U	200 Reservine Resorcinol
U	201
UZ	203 Safrole 204 Selenious acid
U2	205 Selenium sulfide (R.D.
	"Silver see 11222
U2	
10	2,4,5-T see U232 1,2,4,5-Tetrachlorobenzeme
12	1,2,4,5-Tetrachlorobenzeme
J2	1.1.1,2-Tetrachloroethane
	10 Tetrachloroethene
	Tetrachloroethylene see U210
12	11 Tetrachicromethane 12 2,3,4,6-Tetrachicrophenci
	E.J.y.o-1etrachiorophenol
12	
12	14 Thallium (I) acetate
12	14 Thallium (I) acetate 15 Thallium (I) carbonate
12 12 12	15
12 12 12 12	14
12 12 12 12 12	14
12 12 12 12 12	14
12 12 12 12 12 12 12 12 12 12 12 12 12 1	14
12 12 12 12 12 12 12 12 12 12 12 12 12 1	14

Isobutyl alcohol



Mazardous Maste No.		Hazardous waste No.		Hazardous Substance waste No.
231	Cyanogen		MALIK see P050	P102
>332			MAREVAN see P001	PROTHROMADIN See P001
C33		1	MAR-FRIN see P001	OUICKSAM see P092
	Cyclodan see P050	1	MARTIN'D MAR-FRIN see P001	QUINTOX see P037
034	. 2-Cyclohexyl-4.6-dinitrophenol		MAVERAN see P001	RAT AND MICE BAIT see POOT
	D-CON see P001	10.0	MEGATOX see PO05	RAT-A-WAY see P001
	DETHMCR see POO1	P065	Mercury fulminate	RAT-B-GON see P001
	DETHNEL see P001 DFP see P043		MERSOLITE see P092	RAT-O-CIDE #2 see P001
)35			METACID 50 see P071	RAT-GUARD see P001
36	D'ablanches famine	1	METAPHOR see P071 METAPHOR see P071	PAT-MIX see P001
,30	Dicyanogen see P031	1	METAPHOS see P071	RAT-MIX see P001 RATS-NO-MORE see P001
37	Dieldrin	1	METASOL 30 see P092	RAT-OLA see P001
	DIELDREX see P037	P066	Methomyl	RATOREX see POO1
38	Diethylarsine	P067	2-Methylaziridine	RATTUNAL see P001
39	0.0-Dictryl-S-(2-(ethylthio)ethyllester of phos-	· mich	METHYL-E 605 see P071	RAT-TROL see PCO1
	phorothoic acid	P068	Methyl hydrazine	BO-DETH see Poot
40	0.0-Drethyl-0-(2-pyrazinyf)phosphorothioate		Methyl isocyanate see PC64	RO-DEX see P108
	0.0-Diethyl phosphoric acid, 0-p-nitrophenyl ester	P069	2-Methyllactonitrile	ROSEX see P001
42	3,4-Dinydroxy-alpha-(methylamino)-methyl benzyl	P070	2-Methyl-2-(methylthio)propionaldehyde-o-	ROUGH & READY MOUSE MIX see POOT
12	alcohol	1 2 E TO 1	(methylcarbonyl) oxime	SANASEED see P108
43	Di-sopropylluorophosphate	207	METHYL NIRON see P042	SANTOBRITE see P090
	1.4:5.8-Dimethanonaphthalene, 1.2.3.4.10.10-	P071	Methyl parathion	SANTOPHEN see P090
	1.4:5,8-Dimethanonaphthalene, 1,2,3,4,10,10- hexachloro-1,4,4a,5,8,8a-hexahydro endo,	1.4	METRON see P071	SANTOPHEN 20 see P090
	: and are 0050		MOLE DEATH see P108	SCHRADAN see P085
44	Dimethoats	1	MOUSE-NOTS see P108	P103 Selenourea
45	3.3-Dimethyl-1-(mothylthio)-2-butanone-O-	13126	MOUSE-TOX see P108	P104 Silver Cyanide SMITE see P105
	[(methylamino)carbonyl] oxime		MUSCIMOL see P007	SMITE see P105 SPARIC see P020
46	alpha alpha-Dimethylphenethylamine	P072	1-Naphthyl-2-thiourea	SPOR-KIL see P092
W. Rey	Dustrocyclohexylphenol see P034	P073	Nickel carbonyl	SPRAY-TROL BRAND RODEN-TROL See P
47	4.6-Dinitro-o-cresol and salts	P074	Nickel cyanide	SPURGE see P020
48	2.4-Dinitrophenol	P075	Nicotine and salts	P105 Sodium azida
	DINOSEB see PO20	P076	Nitric oxide	Sodium coumadin see P001
	DINOSEBE see PO20	P077	p-Nitroaniline	P106 Sodium cyanide
	Disulfoton see P039	P078	Nitrogen dioxide	Sodium fluoroacetate see P056
49	2.4-Ditmobruret	P079	Nitrogen peroxide	SODIUM WARFARIN see P001
	DNBP see P020	P080	Nitrogen tetroxide	SOLFARIN see P001
	DOLCO MOUSE CEREAL see P108	P081	Nitroglycerine (R)	SOLFOBLACK BB see P048
	DOW GENERAL see PO20	P082	N-Nitrosodimethylamine	SOLFOBLACK SB see P048
	DOW GENERAL WEED KILLER see P020 DOW SELECTIVE WEED KILLER see P020	P083	N-Nitrosodiphenylamine	P107 Strontium sulfide
	DOWICIDE G soo P090	P084	N-Nitrosomethylvinylamine	P108 Strychnine and salts
- 12	DYANACIDE see P092	42.43	NYLMERATE see P092 OCTALOX see P037	SUBTEX see P020
/:	EASTERN STATES DUOCIDE see POOT	P085	Octamethylpyrophosphoramide	SYSTAM see P085 TAG FUNGICIDE see P092
	FLOFTOL see P020	.,	OCTAN see P092	TAG FUNGICIDE see P092
50	Endocultan	P086	Oleyl alcohol condensed with 2 moles ethylene	TEMIC see PO70
51	Endon	· · · · · · · · · · · · · · · · · · ·	oxide compression and its action	TEMIK see P070
. ,	Epinephrine see P042	2000	OMPA see P085	TERM4-TROL see P090
52	Ethylcyanide		OMPACIDE see P085	P109 Tetraethyldithiopyrophosphate
		1.1/1	OMPAX see P085	P110 Tetractive lead
54		P087	Osmium tetroxide	P111 Tetraethylpyrophosphale
	FASCO FASCRAT POWDER see P001 FEMMA see P091	P088	7-Oxabicycio[2.2.1]heptane-2,3-dicarboxylic acid	P112 Tetranitromethane
55	Ferric cyanide		PANIVARFIN see POOT	Tetraphosphonic acid, hexaethyl ester see Pi
56	Fluoring		PANORAM D-31 see P037	TETROSULFUR BLACK P8 see P048
	2-Fluoroacetamide		PANTHERINE See POOT	TETROSULFIUR PBR see P048
	Florescette and sodium salt	P089	PANWARFIN see P001	P113 Thallic oxde
	FOLCOOL-80 see P071	1003	PCP see P090	P114 Thallium peroxide see P113
	FOLODOL M see P071		PENNCAP-M see P071	
	FOSFERNO M 50 see P071	17.W	DENOVAL CADDON N and BOAD	P115 Thallium (I) sulfate THIFOR see P092
.:.	FRATOL see P058	P090	Pentachlorophenol	THIMUL see PO92
	Fulminate of mercury see P065		Pentachlorophenate see P090	THIODAN see P050
	FUNGITOX OR see P092		PENTA-KILL see P090	THIOFOR see P050
	FUSSOF see P057		PENTASOL see P090	THIOMUL sea PO50
	GALLOTOX See PO92		PENWAR see P090	THIONEX see POSO
	GEARPHOS See PO/1		PERMICIDE SEE PUSU	THIOPHENIT see P071
0	GERUTOX see P020		PERMAGUARD see P090	P116 Thiosemicarbazide
	Heptachior		PEHMATOX See Pogo	Thiosulfan tionel see P050
~	1,2,3,4,10,10-Hexachloro-1,4,4a,5,8,8a-		PERMITE 288 PUSO	P117 Thiuram
100	hexahydro-1,4:5,8-endo, endo-dimethanonaph- thalene		PECTON III and PORE	THOMPSON'S WOOD FIX see P090
	1.4.5.6.7.7-Hexachloro-cyclic-5-norbornene-2,3-		PESTOX III See Poos	TIOVEL see P050
	d-methanol suitite see P050.		PHENMAD See P092	P118 Trichloromethanethiol
1	Hexachioropropene	P091	PHENOTAN see P020 Phenyi dichloroarsine	USAF RH-8 see P069
	Hexaethyl tetraphosphate		Phond mercantan see Prita	LICAT EX ARON con BOND
	HOSTAG: HCK san Pogs	P092	Phanulmarcum acotate	P119 Vanadic acid, ammonium salt
	HOSTAQUIK soe P092	P093	Al Chandhiauran	P120 Vanadium pentoxide
	Hydrazomothane see P068		PHILIPS 1861 see P008	VOFATOX see PO71
	Hydrocyanic acid	1	PHIX see P092	WANADU see P120
	ILLOXOL see PO37	P094	Phorate	WARCOUMIN see POO1
	INDOCI see P025		Phosgene	WARFARIN SODIUM see P001
	Indometnacin sea P025	P096	Phosphine	WARFICIDE see POOT
	INSECTOPHENE see POSO		Phosphorothioic acid, 0,0-dimethyl ester, 0-ester	WOFOTOX see PO72
	Isodan see PG60	180	with N,N-dimethyl benzene sulfonamide	YANOCK see P057
	Isocyanic acid, methyl ester		Phosphorothioic acid 0,0-dimethyl-0-(p-nitro-	YASOKNOCK see P058
	KILOSEB sca P020		phenyl) cster see P071	ZIARNIK see P092
	KCP-TH:ODAN see P050		PIED PIPER MOUSE SEED see P108	P121 Zinc cyanide
~	KWIK-KIL see P109	P098	Potassium cyanide	P122 Zinc phosphide (A,T)
	KWIKSAN see PC92	P099	Potassium silver cyanide	ZOOCOUMARIN see POOI
	KUMADER see POOT		PREMERGE see P020	*The Agency included those trade names of which it
	KYPFARIN see PUO1	P100	1,2-Propanediol	aware; an omission of a trade name does not imply that
	LEYTOSAN see PO92		Propargyl alcohol see P102	omitted material is not hazardous. The material is hazard
	LIQUIPHENE See PO92		Prop-onitrile .	



Appendix VII—Basis for Listing Hazardous Waste—Continued

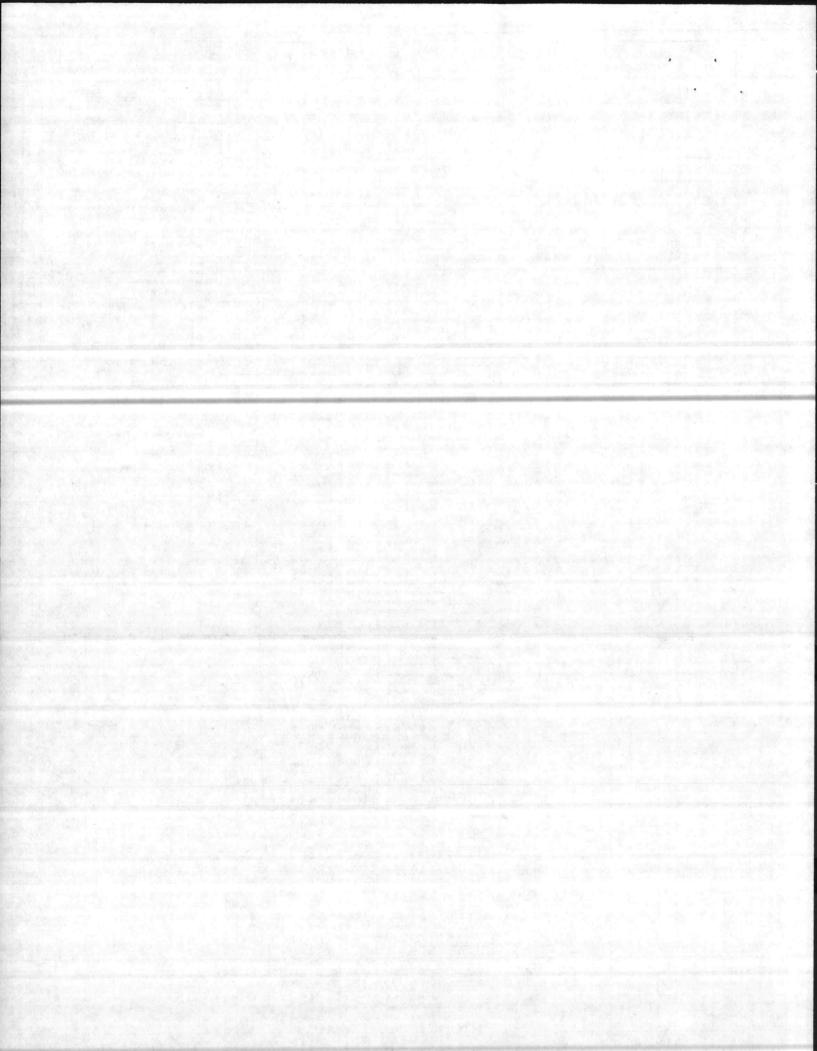
Appendix VII—Basis for Listing Hazardous Waste—Continued

EPA hazardous wasto No.	Hazardous constituents for which listed
F001	Tetrachloroethylene, methylene chlorida
	Inchlorocthylene, 1,1,1-trichloroethane,
	carbon tetrachlonde, chlorinated liuoro-
•	carbons.
F002	Tetrachicroethylene, methylene chloride
	trichloroethylane, 1,1,1-trichloroethane,
	chlorobenzene. 1,1,2-trichloro-1,2,2-tri-
	fluoroethane, ortho-dichlorobenzene,
	trichiorofluoromethano.
F003	NA .
	Cresols and cresylic acid, nitrobenzene
FCOS	Toluene, methyl ethyl ketone, carbon disul-
	fide, isobutanol, pyridine.
F005	Cadmum, hexavalent chromium, nickel
	cyanide (completed).
F007	Cyande (sails).
F008	Cyande (salls).
F000	Cyanda (saits).
F010	Cyanide (salts).
F011	Cyanide (salts).
F012	Cyanide (complexed).
	Oyando (complemed).
Fe15	
F019	Hexavalent chromium, cyanida (com
	plexed).
K001	Pentachlorophenol, phenol, 2-chlorophenol
	p-chloro-m-cresol. 2,4-dimethylphenyl
	2.4-dinitrophenol, trichlorophenols, te
	trachlorophenois, 2,4-dinitrophenol, cre
	sosote, chrysene, naphthalene, fluoranth
	ene, benzo(b)fluoranthene
	benzo(a)pyrene, indeno(1,2,3-cd)pyrene
	benz(a)anthracene, dibenz(a)anthracene
	acenaphthalene.
K002	Hexavalent civomum, lead
KC03	Hexavalent chromium, lead.

EPA hazardous waste No.	Hazardous constituents for which listed	· EPA h
		. K022_
		.:. NUZZ.
	Hexavalent chromium, lead.	~ K023.
	rioxavaietti Cittottitum.	K024
K007	Cyanide (complexed), hexavalent chromi-	
	um	K025
	Hexavalent chromium.	· K026
K009	Chloroform, formaldehyda, methylene chlo-	- K027_
	ride, methyl chlonde, paraldehyde, formic	K028
1 . A. A	acid.	K029.
K010	Chloroform, formaldehyde, methylene chlo-	
1.35	nide, methyl chloride, paraldehyde, formic scid, chloroacetaldehyde.	: K030
VA44	Academical acceptance by the service and	
K012 :	Acrylonitrile, acetonitrile, hydrocyanic acid. Hydrocyanic acid, acrylonitrile, acetonitrile.	
KO13	Hydrocyanic acid, acrylorume, acetonitme.	
K014	Acetonitrile, acrylamide.	- K031
K015	Benzyl chloride, chlorobenzene, toluene,	K032.
ко16	- benzotrichloride.	K033
K016	Hexachlorobenzene, hexachlorobutadiene,	K034_
17 11 1	carbon tetrachloride, hexachloroethane,	K035.
	carbon tetrachloride, hexachloroethane, perchloroethylene. Epichlorohydrin, chloroethers	. woo.
K017	Epichlorohydrin, chloroethers	
1	[bis(chloromethyl) ether and bis (2-chlor-	
	soethyl) ethers], trichloropropane, dichlor-	
4.0	opropanois.	Mana
K018	1,2-dichloroethane, trichloroethylene, hex-	K036_
	achlorobutadiene, hexachlorobenzene.	17:
K019	Ethylene dichloride, 1,1,1-trichloroethane,	· K037.
1	1,1,2-trichloroethane, tetrachloroethanes	
3 25012	. (1,1,2,2-tetrachloroethane and 1,1,1,2-te-	. K038.
4	trachloroethane), trichloroethylene, te-	
1 -10-5	trachlorcethylene, carbon tetrachloride,	K039.
1	chloroform, vinyl chloride, vinylidene	
1	chloride.	K040.
K020	Ethylene dichloride, 1.1.1-trichloroethane,	
N020	1.1.2-trichloroethane, tetrachloroethanes	K041.
1. 1. 1. 1.	(1,1,2,2-letrachioroethane and 1,1,1,2-te-	K042.
	trachloroethane), trichloroethylene, te-	K043.
1.75	trachloroethylene, carbon tetrachloride,	:
	chloroform, vinyl chloride, vinylidene	K044.
	chloride.	K0-15
K021	Antimony, carbon tetrachloride, chloroform.	K046
		. NU48.

EPA hazardo	
	to the tempte amount of hydrocare
K022	Phenol, tars (polycyclic aromatic hydrocar- bons).
	Phthalic anhydride, maleic anhydride.
K023	
K024	
K025	
K026	Toluene disocyanate, toluene-2, 4-diamine.
K027	100ene unsocyanate, totalica
K028	1,1,1-Irichloroethane, vinyl chloride. 1,2-dichloroethane, 1,1.1-Irichloroethane,
K029	1,2-0ichloroeutarie, 1,1-1 Crisco centario,
35 - 1 AT 1	Vinyl chloride, vinylidene chloride, chloro-
	form.
K030	THE LEXACTIONOGITETION THEY AND THEY AND THE TOTAL THEY
*	hexachloroethane, 1,1,1,2-tetrachlo-
	roethane, 1,1,2,2-tetrachloroethane, eth-
. * . ". "	ylene dichloride. Arsenic.
K031	Arsenic.
K032	Hexachlorocyclopentaciene.
· K033	Hexachlorocyclopentadiene.
·K034	Hexachlorocyclopentacliene.
K035	Creosote, chrysene, naphthalene, fluor-
-4-167-00	anthene benzo(a) fluoranthene, benzo(a)pyrene, indeno(1,2,3-cd) pyrene,
	benzo(a)pyrene, indeno(1,2,3-cd) pyrene,
	henzo(a)anthracene.
	dibenzo(a)anthracene, acenaphthalene.
K036	Toluene, phosphorodithioic and
	phoenhara things and peters
K037	Toluene, phosphorodithioic - and
	Toluene, phosphorodithioic and phosphoro-thioic acid esters. Phorate, formaldehyde, phosphorodithioic
. K038	Phorate, formaldehyde, phosphorodithioic
K039	Phosphorodithioic and phosphorothioic acid
	esters.
K040	Phorate, formaldehyde, phosphorodithioic
	and phosphorothioic acid esters.
word .	Toxaphene.
	Hexachlorobenzene, ortho-dichloroben-
11/46	zene.
K043	
NU43	2,4-dichlorophenol. 2,6-dichlorophenol.
K044	LIA
K0-15	
K046	Lead.

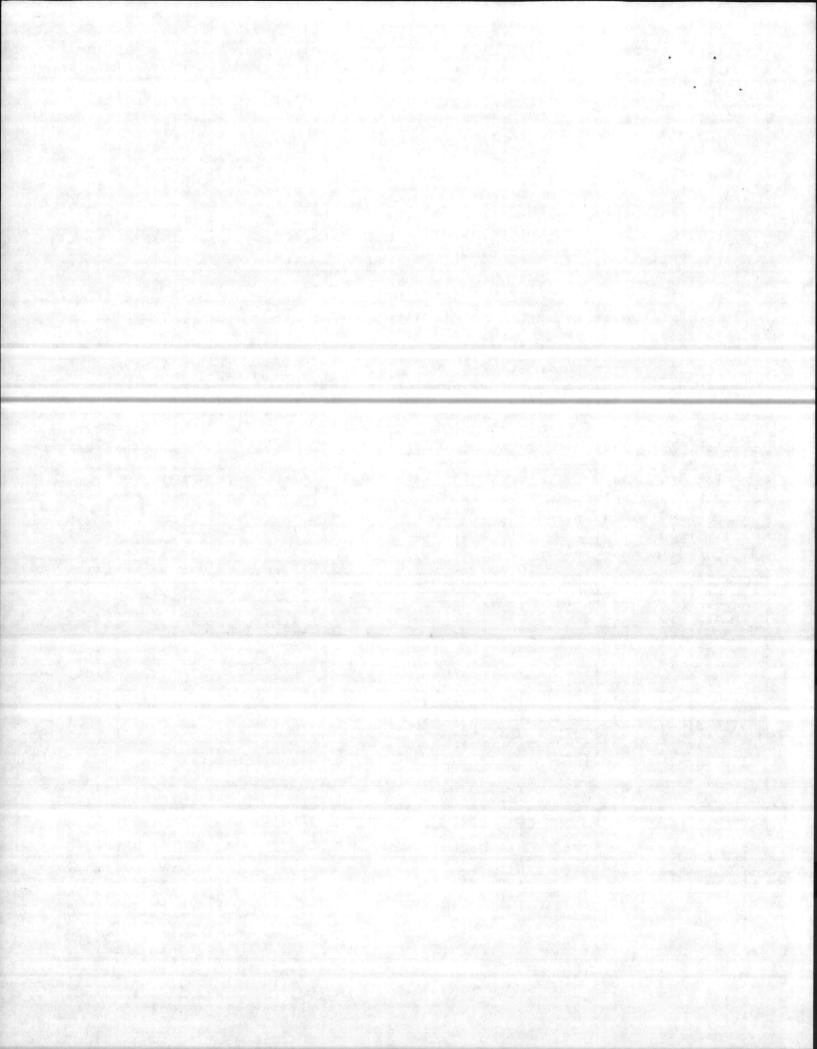
EPA hazard waste No	Hazardous constituents for which listed
	NA TARA
K047	
K048	Hexavalent chromium, lead.
K049	Hexavalent chromium, lead.
K050	Hexavalent chromium.
K051	Hexavalent chromium, lead.
K052	Lead.
K060	Cyanide, napthalene, phenolic compounds,
	Cyanide, napthalene, phenolic compounds, arsenic.
VOD!	nexavalent chromon, leto, caomon.
K052	Hexavalent chromium, lead.
Kaca	Lead, cadmiss.
MO65	Load codmium
PA/00	EGGC_CACCEMUTE
KGG7	Lead, cadmum. Lead, cadmum. Lead, cadmum. Lead, cadmum. 3
Kees	Lead-padarum 5
K069	Hexavalent chromium, lead, cadmium.
	Mercury.
	Chloroform, carbon tetrachloride, hexachol-
-	rocthane, trichloroethane, tetrachloro-
	ethylena dichlornathylena 1122-let-
	ethylene, dichloroethylene, 1,1,2,2-tel- rachloroethane.
K083	rachlorcothane. Aniline, diphenylamine, nitrobenzene, phen-
	Manadiamina
K084	ylenediamino. Alsenic.
K085	Benzene, dichlorobenzenes, trichloroben-
	그리고 하는 사람들은 아이를 보고 있다면 하는 것이 되었다. 그는 사람들은 사람들은 사람들은 사람들이 되었다.
	zenes, tetrachiorobenzenes, pentachioro- benzene, hexachicrobenzene, benzy
	chloride.
MANG	Chloride. Lead, hexavalent chromium. Phenol, naphthalene.
K080	Dhand parking chromium.
KU87	Priendi, naprinalena.
K094	Phthalic anhydride.
	1,1,2-trichloroethane, 1,1,1,2 tetrachloroeth
	ane, 1,1,2,2-tetrachloroethane.
K096	1,2-dichloroethane, 1,1,1-trichloroethane,
	1,1,2-tnchloroethane.
	Chlordane, heptachlor.
	Toxaphene.
K099	2,4-dichlorophenol, 2,4,5-trichlorophenol.
K100	Hexavalent chromium, lead, cadmium.
K101	Arsenic.
K102	Arsenic.
K103	Andine, ndrobenzene, phenylenediamine.
K104	Anilino, benzene, dicherylamine, nitroben-
	zene, phenylenediamine.
K105	Benzene, mozochlorchenzene dichloro-
	benzenes, 2,4,6-trichlorophenol.
K106	Morcury.



Talana and the same of the sam
Toluene diisocyanate
_ Toxaphene
2,4,5-TP see U233
_ Tribromomethane
1,1,1-Trichloroethane
1,1,2-Trichloroethane
- Trichloroethene
Trichloroethylene see U228
Trichlorofluoromethane
2,4,5-Trichlorophenol
. 2,4,6-Trichlorophenol
. 2,4,5-Trichlorophenoxyacetic acid
2,4,5-Trichlorophenoxypropionic acid alpha.
alpha, alpha- Trichlorotoluene see U023
TRI-CLENE see U228
Trinitrobenzene (R,T)
Tris(2,3-dibromopropyl) phosphate
Trypan blue
Uracil mustard
Urethane
Vinyl chloride see U043
Vinylidene chloride see U078
Xylene .

The following corrections to 40 CFR 261.33 appeared in 46 FR 27474:

)1	3-(alpha-acetonylbenzyl)-4-hydroxycoumarin and salts	Spelling corrected	Compound should read: 3-(alpha-Acetonyl-benzyl) 4-hydroxycoumarin ar
	Squip a description and substitution of the same and substitution of the s	The state of the s	C. salts.
3	Aluminum phosphide	. Corrected reason for listing	Compound should read: Aluminum phosphide (R.T).
	4-aAminopyndine	. Spelling corrected	Compound should read: 4-Aminopyridine.
3	Phosphorofluone acid, bis-(1-methylethyl)-ester	do	Compound should read: Phosphorofluoridic acid, bis(1-methylethyl) este
7	Phenol 2,4-dinitro-8-methyl-	. Listing corrected	On May 19, 1980, the compound was originally-listed as 2.4-Dinitrocres
		and the state of t	and salts. On Nov. 25, 1980, this compound was listed as Phenol, 2,
	and new to the angeliant of the profit of the second of the first	State of the season of the season	dinitro-6-methyl. The words "and salls" were inadvenently left out. The
			listing should read: Phenol, 2.4-di-nitro-6-methyl-, and salts.
0	Hexachlorohexahydro-exo,exo-Gmethanonaphthalene	Spelling corrected	Compound should read: Hexachlorohexahydro-endo, : end
		第一次大大大学、1995年1月前日本文学的	dimethanonaphthalene.
9	Phosphorothiod acid, O,O-diethyl O-(p-nitrophenyl)	do	Compound Should feed. Phospholodiloid Edg. C. G.
		en grage with the property of	ester.
4	Thatium (f) selectio	do	Compound should read: Thattium (I) selenide.
6	2-Naphthylamine, N.N'-bis(2-chloromothyl)	do	. Compound should read: 2-Naphthylamine, N.N-bis(2-chloroethyl)
55	Butanoic acid, 4-{Bis(2-chloroethyl)amino]benzene	do	Compound should read: Butanoic acid, 4-fols
, , , , , , , , , , , , , , , , , , , ,		are respectively. With the	: chloroethyl)amino?benzene-
	2H-1.3.2-Oxazaphosphorine, 2-[bis(2-chloro-ethyl)amino]-	do	. Compound should read: , 2H-1,3,2-O.cazaphosphorine, · 2[bis
	tetrahydro-, oxide-2.		chloroethytlamino lietrahydro-, 2-oxide.
37	Etylene dibrorrido	do	Compound should read: Ethylene dibromide.
7	Phosphorodityoic acid, O,O-diethyl-, S-methylester	do	Compound should read: Phosphorodithioic acid, O.O-dethyl S-methyl est
			and providing the transfer of the state of t
23	Benzenamine, N.N'-d'methyl-4-phenylazo-		Compound should read: Benzenamine, N,N-dimethyl-4-(phenylazo)
05	Benzene, 1-methyl-2,4-cinitro-	do	Compound should read: Renzene, 1-methyl1-2.4-dinitro.
11	Deti-prograntosamine	do	Compound should read: Di-n-propylnitros ine.
11	N-N-troso-N-cropylamine	do	Compound should read: N-Mitrosodi-n-propylamine.
14	Ethylenebs(o:thiocarbamic acid)	. Change to Ethylene-	On May 19, 1980, the compound was originally listed as Ethylenebis
17	Entheriep atomoca on the good	bis(dithiocarbamio acid), salts	: thiocarbamate. The November 25, 1980 Federal Register changed t
15	Ethlene oxide	. Spelling corrected	listing. Compound should read: Ethylene oxide.
18	Ethylmethacrylate	do	Compound should read: Ethylene oxide. Compound should read: Ethyl methacrylate.
21		One listing deleted	The compound was tradvertering listed twee.
		Spelling corrected	Compound should read: 1,10-(1,2-Phenylene)pyrene.
45	Phosphore and, Lead salt	do	Compound should read: Phosphoric acid, lead salt.
43		do	Compound should read: 1,2-Dihydro-3,6-pyridazinedione.
55	Pynoine, 2-1(2-dimethylamino)-2-thenylamino]-	do	Compound should read: Pyridine, 2-[(2-dimethylamino) ethyl]-2-than
			mino-, The Assessment of the County of the Assessment of the County of
63	Guanicine, N-nitroso-n-methyl-N'nitro-	do	Compound should read: Guanidine, N-nitroso-N-methyl-N-nitro
F.5	. 1,4-Naohthagunone	do	Compound should read: 1,4-Naphthoquinone.
82	. 1,3,5-Trioxane 2,4,5-trimethyl-	O	Compound should read: 1,3,5-Trioxane, 2,4,6-trimethyl.
25	Benzene, pentactiono-nitro-	do	. Compound should read: Benzene, pentachloronitro-
69	1172,10,003 30,100,1111111111111111111111111	do	Compound should read: Prosphorus sulfide.
02	1,2 00113011100110101111011011	Listing corrected	On November 25, 1980, the compound was correctly fisted as Saccha
211 1.2	grave proceedings that the state of the stat	AND THE PROPERTY OF THE PARTY OF	and salts, however in the listing under its chemical name, the wo
	A. Comercial Section Con Contraction	Secretary of Marchael	"and salts" were inadvertently left out. Compound should read
	- [20] [14] [15 - 16 - 16 - 16 - 16 - 16 - 16 - 16 -	Charles to the control of the contro	Benzisothiazolin-3-ona, 1,1-dioxide, and saits.
The second second	O-Tolumbne hydrochloride.	Spelling corrected	Compound should read: o-Toluidine hydrochloride.
	Benzene, 1,3,5-trinnro-	Hazardous waste number correct-	Hazardous waste number appears as .0234 and should be .04
34	Benzene, 1,3,5-trinntro-	ed	목으로 가장을 하는 어린 사람들이 아이지 않는데 아이지 않는데 아이를 살아내려가 되었다.
34	Benzene, 1,3,5-trinnro	ed Spelling corrected	Compound should read: Uracil, 5(bis(2-chloroethyl)amino).
37	Benzene, 1,3,5-trintro	ed. Spelling corrected do do	Compound should read: Uracil, 5[bis(2-chloroethyl)amino].
37	Benzene, 1,3,5-trinitro	ed. Spelling corrected do	Compound should read: Uracil, 5[bis(2-chloroethyl)amino]. Compound should read: 2.4-D, salts and esters. This compound was omitted mistakenly from § 261.33(f). Methoxychloroethyl)
37	Benzene, 1,3,5-trinnro	ed. Spelling corrected do	Compound should read: Uracil, 5[bis(2-chloroethyl)amino]. Compound should read: 2.4-D, salts and esters. This compound was omitted mistakenly from § 261.33(f). Methoxychlo an EP Toxicity constituent and is also one of the materials regulated
37	Benzene, 1,3,5-trinitro	ed. Spelling corrected do	Compound should read: Uracil, 5(bis(2-chloroethyl)amino). Compound should read: 2.4-D, salts and esters. This compound was omitted mistakenly from § 261.33(f). Metrocycho an EP Toxicity constituent and is also one of the materials regulated. A National Interim Primary Drinking Water Standard; as toxicity theret
37	Benzene, 1,3,5-trinitro	ed. Spelling corrected do	Compound should read: Uracil, 5[bis(2-chloroethyl)amino). Compound should read: 2.4-D, salts and esters. This compound was omitted mistakenly from § 261.33(f). Methoxychlo an EP Toxicity constituent and is also one of the materials regulated a National Interim Primary Drinking Water Standard: 4s foxicity there' is well recognized. The background document for § 261.33 indicated.
37	Benzene, 1,3,5-trinitro	ed. Spelling corrected do	Compound should read: Uracil, 5[bis(2-chloroethyl)aminol. Compound should read: 2.4-D, salts and esters. This compound was omitted mistakenly from § 261.33(f). Methoxychlo an EP Toxicity constituent and is also one of the materials regulated a National Interim Primary Drinking Water Standard; as toxicity there is well recognized. The background document for § 261.33 indicated all compounds for which a National Interim Primary Drinking Standard.
37	Benzene, 1,3,5-trinitro	ed. Spelling corrected do	Compound should read: Uracil, 5(bis(2-chloroethyl)amino). Compound should read: 2.4-D, salts and esters. This compound was omitted mistakenly from § 261.33(f). Methoxychlon an EP Toxicity constituent and is also one of the materials regulated. 8 National Interm Primary Drinking Water Standard: as toxicity there is well recognized. The background document for § 261.33 indicated all compounds for which a National Interm Primary Drinking Standhas been established are to be included under § 261.33 (Background included under § 261
37	Benzene, 1,3,5-trinitro	ed. Spelling corrected do	Compound should read: Uracil, 5[bis(2-chloroethyl)amino]. Compound should read: 2.4-0, salts and esters. This compound was omitted mistakenly from § 261.33(n, Mathovycho an EP Toxicity constituent and is also one of the materials regulated a National Interim Primary Drinking Water Standard; as toxicity there is well recognized. The background document for § 261.33 indicated all compounds for which a National Interim Primary Drinking Standard has been established are to be included under § 261.33 (Backgroman Document for § 261.33. April 30, 1980, at pp. 19, 70), and all of
37	Benzene, 1,3,5-trinitro	ed. Spelling corrected do	Compound should read: Uracil, 5[bis(2-chloroethyl)aminol. Compound should read: 2.4-D, salts and esters. This compound was omitted mistakenly from § 261.33(f). Methoxychlo an EP Toxicity constituent and is also one of the materials regulated a National Interim Primary Drinking Water Standard; as toxicity there is well recognized. The background document for § 261.33 indicated all compounds for which a National Interim Primary Drinking Standhas been established are to be included under § 261.33 (Background Document for § 261.33, April 30, 1980, at pp. 19, 70), and all of other positicides covered by a Primary Drinking Water Standard
37	Benzene, 1,3,5-trinitro	ed. Spelling corrected do	Compound should read: Uracil, 5(bis(2-chloroethyl)amino). Compound should read: 2.4-D, salts and esters. This compound was omitted mistakenly from § 261.33(f). Methoxychlon an EP Toxicity constituent and is also one of the materials regulated. 8 National Interm Primary Drinking Water Standard; as toxicity there is well recognized. The background document for § 261.33 indicated all compounds for which a National Interm Primary Drinking Standhas been established are to be included under § 261.33 (Background Document for § 261.33, April 30, 1980, at pp. 19, 70), and all of other positiodes covered by a Primary Drinking Water Standard included under \$ 261.33. In fact, comments were secenced question.
37	Benzene, 1,3,5-trinitro	ed. Spelling corrected do	Compound should read: Uracil, 5[bis(2-chloroethyl)amino]-



Appendix VIII

Hazardous Constituents

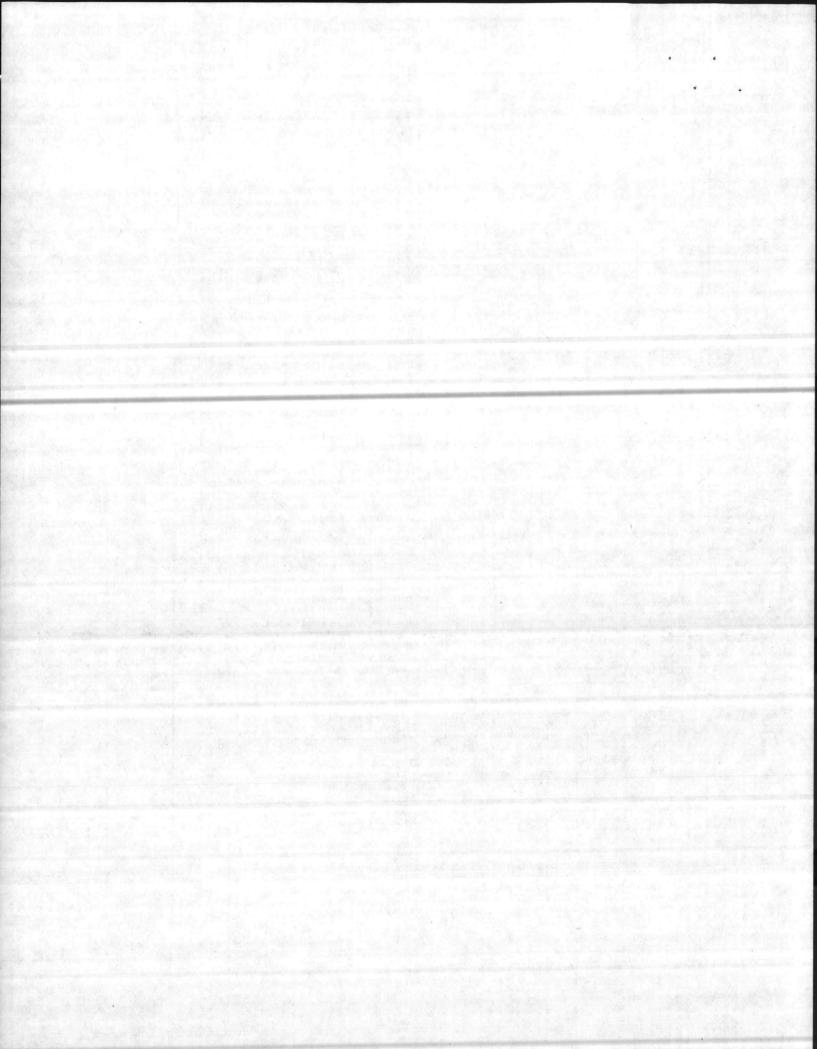
- Acetonitrile (Ethanenitrile) Acetophenone (Ethanone, 1-phenyl) 3-(alpha-Acetonylbenzyl)-4-hydroxycoumarin and salts (Warfarin) 2-Acetylaminofluorene (Acetamide, N-(9H-- fluoren-2-yl)-) Acetyl chloride (Ethanoyl chloride) 1-Acetyl-2-thiourea (Acetamide, N-(aminothioxomethyl)-) Acrolein (2-Propenal) Acrylamide (2-Propenamide) Acrylonitrile (2-Propenenitrile) Aflatoxins Aldrin (1,2,3,4,10,10-Hexachloro-1.4.4a,5,8.8a,8b-hexahydro-endo,exo-1,4:5.8-Dimethanonaphthalene) Allyl alcohol (2-Propen-1-ol) Aluminum phosphide 4-Aminobiphenyl ([1,1'-Biphenyl]-4-amine) 0-Amino-1,1a,2,8,8a,8b-hexahydro-3-(hydroxymethyl)-8a-methoxy-5-methylcarbamate azirino[2',3':3,4]pyrrolo[1,2a]indole-4,7-dione, (ester) (Mitomycin C)

(Azirino[2'3':3,4]pyrrolo(1,2-a)indole-4,7-

dione, 6-amino-8-[((aminocarbonylloxylmethyll-1,1a,2,8,8a,8bhexahydro-8amethoxy-5-methy-) 5-(Aminomethyl)-2-isoxazolol (3(2H)-Isoxazolone, 5-(aminomethyl)-)4aminopyridine (4-Pyridinamine)
Amitrole (111-1,2,4-Triazol-3-amine) Aniline (Benzenamine) Antimony and compounds, N.O.S. Aramite (Sulfurous acid, 2-chloroethyl-, 2-[4-[1,1-dimethylethyl]phenoxy]-1-methylethyl ester): Arsenic and compounds, N.O.S.* Arsenic acid (Orthoarsenic acid) Arsenic pentoxide (Arsenic (V) oxlde) Arsenic trioxide (Arsenic (III) oxide) Auramine (Benzenamine, 4,4 carbonimidoylbis[N.N-Dimethyl-monchydrochloride]

Azaserine (L-Serine, diazoacetate (ester)) Barium and compounds, N.O.S.*
Barium cyanide
Benz[c]acridine (3,4-Benzacridine) Benz[a]anthracene (1,2-Benzanthracene)
Benzene (Cyclohexatriene) Benzenearsonic acid (Arsonic acid, phenyl-) Benzene, dichloromethyl- (Benzal chloride) Benzenethiol (Thiophenol) Benzidine [[1,1'-Biphenyl]-4,4'diamine) Benzo[b]fluoranthene (2,3-Benzofluoranthene) Benzo[j]fluoranthene (7.8-Benzofluoranthene) Benzo[a]pyrene (3.4-Benzopyrene) p-Benzoquinone (1.4-Cyclohexadienedione) Benzotrichloride (Benzene, trichloromethyl-) Benzyl chloride (Benzene, (chloromethyl)-) Beryllium and compounds, N.O.S.* Bis(2-chloroethoxy)methane (Ethane, 1,1'-[methylenebis(oxy)]bis[2-chloro-])
Bis[2-chloroethyl) ether (Ethane, 1,1'oxybis[2-chloro-]) N,N-Bis(2-chloroethyl)-2-naphthylamine (Chlornaphazine) Bis(2-chloroisopropyl) ether (Propane, 2,2'oxybis[2-chloro-])
Bis(chloromethyl) ether (Methane, oxybis[chloro-])
Bis(2-ethylhexyl) phthalate (1,2-Benzenedicarboxylic acid, bis(2-ethylhexyl) ethylhexyl) ester) Bromoacetone (2-Propanone, 1-bromo-) Bromomethane (Methyl bromide) 4-Bromophenyl phenyl ether (Benzene, 1bromo-4-phenoxy-) Brucine (Strychnidin-10-one, 2,3-dimethoxy-) 2-Butanone peroxide (Methyl ethyl ketone, peroxidel .:.. Butyl benzyl phthalate (1,2-Benzenedicarboxylic acid, butyl phenylmethyl ester) 2-sec-Butyl-4,6-dinitrophenol (DNBP) (Phenol, 2,4-dinitro-6-(1-methylpropyl)-) Cadmium and compounds, N.O.S.* Calcium chromate (Chromic acid, calcium I there describe by usual Calcium cyanida Carbon disulfide (Carbon bisulfide) Carbon oxyfluoride (Carbonyl fluoride) Chloral (Acetaldehyde, trichloro-) Chlorambucil (Butanoic acid. 4-[bis(2chloroethyl)amino]benzene-)

^{*} The abbreviation N.O.S. (not otherwise specified) signifies those members of the general class not specifically listed by name in this appendix.



Chlordane (alpha and gamma isomers) (4.7-Methanoindan, 1,2,4,5,6,7,8,8-octachloro-3.4.7.7a-tetrahydro-) (alpha and gamma 🚅 🚟 Chlorinated benzenes, N.O.S.* isomers) Chlorinated ethane, N.O.S.* Chlorinated fluorocarbons, N.O.S.* Chlorinated naphthalene, N.O.S. Chlorinated phenol, N.O.S.* Chloroacetaldehyde (Acetaldehyde, chloro-) Chloroalkyl ethers, N.O.S.

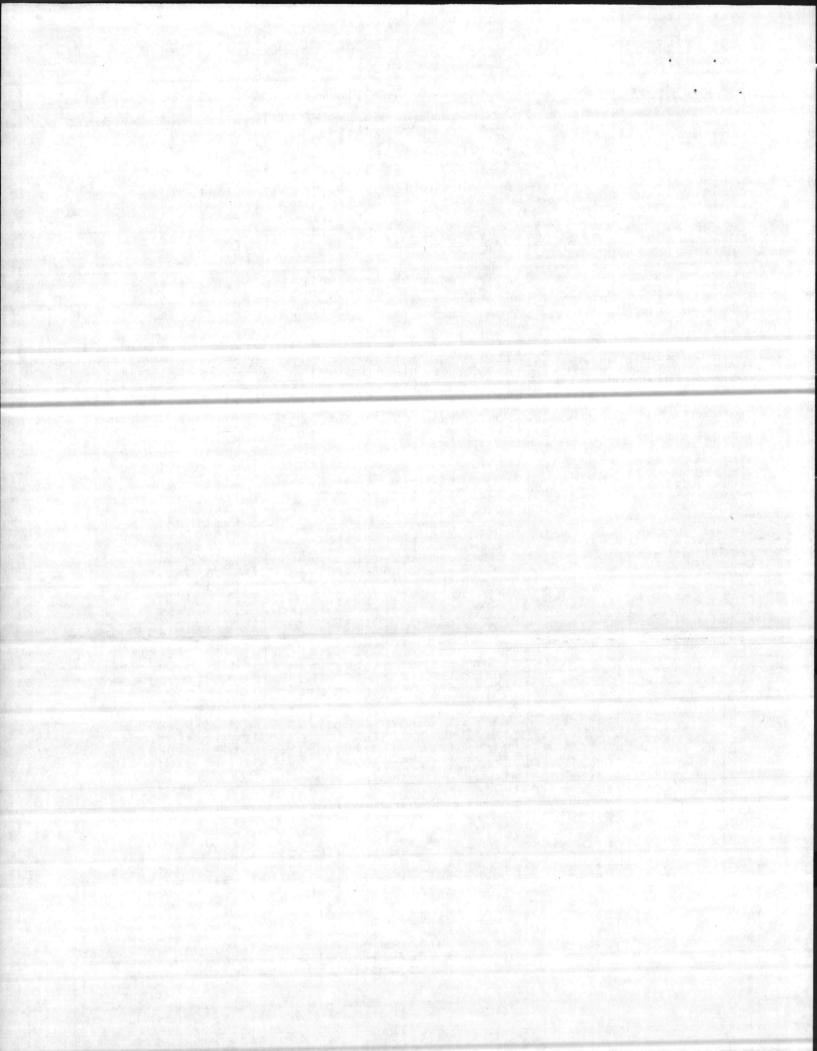
p-Chloroaniline (Benzenamine, 4-chloro-) Chlorobenzene (Benzene, chloro-) Chlorobenzilate (Benzeneacetic acid, 4chloro-alpha-(4-chlorophenyl)-alphahydroxy-, ethyl ester) p-Chloro-m-cresol (Phenol, 4-chloro-3-methyl) p-Chloro-m-cresol (Phenol, a-Chloro-2,3-epoxypropane (Oxirane, 2-(Chloroethyl)-)
2-Chloroethyl vinyl ether (Ethene, (2-chloroethoxy)-) Chloroform (Methane, trichloro-) Chloromethane (Methyl chloride) Chloromethyl methyl ether (Methane, chloromethoxy-) 2-Chloronaphthalene (Naphthalene, betachloro-1 chloro-)
2-Chlorophenol (Phenol, o-chloro-) 1-[o-Chlorophenyl]thiourea (Thiourea, [2chlorophenyl]-) 3-Chloropropionitrile (Propanenitrile, 3chloro-) Chromium and compounds. N.O.S.* Chrysene (1,2-Benzphenanthrene) Citrus red No. 2 (2-Naphthol, 1-[(2,5dimethoxyphenyl)azo]-)
Coal tars
Copper cyanide
Creosote (Creosote, wood) Cresols (Cresylic acid) (Phenol, methyl-) Crotonaldehyde (2-Butenal)
Cyanides (soluble salts and complexes). Cyanogen (Ethanedinitrile) Cyanogen bromide (Bromine cyanide) Cyanogen chloride (Chlorine cyanide) Cycasin (beta-D-Glucopyranoside, (methyl-ONN-azoxy]methyl-] 2-Cyclohexyl-4.6-dinitrophenol (Phenol, 2cyclohexyl-4.6-dinitro-) Cyclophosphamide (2H-1,3,2,-. with the second Oxazaphosphorine, [bis[2chloroethyl]amino]-tetrahydro-, 2-oxide] Daunomycin (5.12-Naphthacenedione, (8Scis)-8-acetyl-10-[(3-amino-2,3,6-trideoxy)alpha-L-lyxo-hexopyranosyl]oxy]-7,8,9,10tetrahydro-6.8.11-trihydroxy-1-methoxy-) DDD (Dichlorodiphenyldichloroethane) (Ethane, 1,1-dichloro-2,2-bis(pchlorophenyl]-) DDE (Ethylene, 1.1-dichloro-2,2-bis(4chlorophenyl)-) DDT (Dichlorodiphenyltrichloroethane) (Ethane, 1.1.1-trichloro-2,2-bis(pchlorophenyl)-) Diallate (S-(2.3-dichloroallyl) diisopropylthiocarbamate) Dibenz[a,h]acridine (1.2.5.6-Dibenzacridine) Dibenz[a.j]acridine (1.2.7,8-Dibenzacridine) Dibenzla,hlanthracene (1,2,5,6-Dibenzanthracene) 711-D.benzo[c.g]carbazole (3.4,5,6-Dibenzcarbazole) Dibenzo[a.e]pyrene (1.2.4.5-Dibenzpyrene) Dibenzo[a.h];yrene (1,2,5,6-Dibenzpyrene) Dibenzola.ilpyrene (1.2.7.8-Dibenzpyrene)

1,2-Dibromo-3-chloropropane (Propane, 1,2dibromo-3-chloro-) 1,2-Dibromoethane (Ethylene dibromide) Dibromomethane (Methylene bromide) Di-n-butyl phthalate (1,2-Benzenedicarboxylic acid, dibutyl ester) o-Dichlorobenzene (Benzene, 1,2-dichloro-) m-Dichlorobenzene (Benzene, 1,3-dichloro-) p-Dichlorobenzene (Benzene, 1,4-dichloro-) Dichlorobenzene, N.O.S.* (Benzene, dichloro-, N.O.S.*) 3,3'-Dichlorobenzidine [[1,1'-Biphenyl]-4,4' -diamine, 3,3'-dichloro-) 1,4-Dichloro-2-butene (2-Butene, 1,4-dichloro-) Dichlorodifluoromethane (Methane, dichlorodifluoro-)
1,1-Dichloroethane (Ethylidene dichloride) 1,2-Dichloroethane (Ethylene dichloride) trans-1,2-Dichloroethene (1,2-Dichloroethylene)
Dichloroethylene, N.O.S.* (Ethene, dichloro-N.O.S.*) .1-Dichloroethylene (Ethene, 1.1-dichloro-) Dichloromethane (Methylene chloride) 2,4-Dichlorophenol (Phenol, 2,4-dichloro-) 2,6-Dichlorophenol (Phenol, 2,6-dichloro-) 2,4-Dichlorophenoxyacetic acid (2,4-D), salts and esters (Acetic acid, 2,4dichlorophenoxy-, salts and esters) Dichlorophenylarsine (Phenyl dichloroarsine) Dichloropropane, N.O.S.* (Propane, dichloro-, N.O.S.*) 1,2-Dichloropropane (Propylene dichloride) Dichloropropanol, N.O.S.* (Propanol, dichloro-, N.O.S.*) Dichloropropene, N.O.S.* (Propene, dichloro-N.O.S.*) 1,3-Dichloropropene (1-Propene, 1,3-dichloro-) Dieldrin (1,2,3,4,10.10-hexachloro-6,7-epoxy-1,4,4a,5,6,7,8,8a-octa-hydro-endo,exo-1,4:5,8-Dimethanonaphthalene) 1,2:3,4-Diepoxybutane (2,2'-Bioxirane)
Diethylarsine (Arsine, diethyl-) N.N-Diethylhydrazine (Hydrazine, 1,2diethyl) O,O-Diethyl S-methyl ester of phosphorodithioic acid (Phosphorodithioic acid, O.O-diethyl S-methyl ester O,O-Diethylphosphoric acid, O-p-nitrophenyl ester (Phosphoric acid, diethyl pnitrophenyl ester) Diethyl phthalate (1,2-Benzenedicarboxylic acid, diethyl ester) O,O-Diethyl O-2-pyrazinyl phosphorothioate (Phosphorothioic acid, O,O-diethyl O-pyrazinyl ester Diethylstilbesterol (4.4'-Stilbenediol. alpha,alpha-diethyl, bis(dihydrogen phosphate, (E)-) Dihydrosafrole (Benzene, 1,2methylenedioxy-4-propyl-) 3,4-Dihydroxy-alpha-(methylamino)methyl benzyl alcohol (1,2-Benzenediol, 4-[1hydroxy-2-(methylamino)ethyl]-) Diisopropylfluorophosphate (DFP) (Phosphorofluoridic acid, bis[1methylethyl) ester) Dimethoate (Phosphorodithioic acid, O.Odimethyl S-[2-(methylamino)-2-oxoethyl] ester 3,3'-Dimethoxybenzidine ([1,1'-Biphenyl]-4.4'diamine, 3-3'-dimethoxy-) . p-Dimethylaminoazobenzene (Benzenamine, N.N-dimethyl-4-(phenylazo)-)

3,3'-Dimethylbenzidine ([1,1'-Biphenyl]-4,4' diamine, 3,3'-dimethyl-) Dimethylcarbamoyl chloride (Carbamoyl chloride, dimethyl-) 1-Dimethylhydrazine (Hydrazine, 1,1-2-Dimethylhydrazine (Hydrazine, 1,2dimethyl-) (methylthio)-2-butanone, O-(methylamino) carbonyljoxime (Thiofanox) alpha.alpha-Dimethylphenethylamine (Ethanamine, 1,1-dimethyl-2-phenyl-) 2,4-Dimethylphenol (Phenol, 2,4-dimethyl-) Dimethyl phthalate (1,2-Benzenedicarboxylic acid, dimethyl ester)
Dimethyl sulfate (Sulfuric acid, dimethyl Dinitrobenzene, N.O.S.* (Benzene, dinitro-N.O.S.*) 4,6-Dinitro-o-cresol and salts (Phenol, 2,4dinitro-6-methyl-, and salts)
2,4-Dinitrophenol (Phenol, 2,4-dinitro-) 2,4-Dinitrotoluene (Benzene, 1-methyl-2,4 dinitro-)
2,6-Dinitrotoluene (Benzene, 1-methyl-2,6-dinitro-) Di-n-octyl phthalate (1.2-Benzenedicarboxylic acid, dioctyl ester) 1.4-Dioxane (1.4-Diethylene oxide) Diphenylamine (Benzenamine, N-phenyl-) 1,2-Diphenylhydrazine [Hydrazine, 1,2diphenyl-) Di-n-propylnitrosamine [N-Nitroso-di-npropylamine) 19013000 352 0000 35 1-40 Disulfoton (O,O-diethyl S-[2-(ethylthio)ethyl] phosphorodithioate) 2,4-Dithiobiuret (Thioimidedicarbonic Endosulfan (5-Norbornene, 2,3-dimethanol, 1,4,5,6,7,7-hexachloro-, cyclic sulfite) Endrin and metabolites [1,2,3,4,10,10hexachloro-6,7-epoxy-1,4,4a,5,6,7,8,8aoctahydro-endo,endo-1.4:5,8dimethanonaphthalene, and metabolites) Ethyl carbamate (Urethan) (Carbamic soid, ethyl ester) Ethyl cyanide (propanenitrile) Ethylenebisdithiocarbamic acid, salts and esters (1,2-Ethanediylbiscarbamodithioic acid, salts and esters
Ethyleneimine (Aziridine)
Ethylene oxide (Oxirane) Ethylenethiourea (2-Imidazolidinethione) Ethyl methacrylate (2-Propenoic acid, 2methyl-, ethyl ester) Ethyl methanesulfonate (Methanesulfonic acid, ethyl ester) Fluoranthene (Benzo[j,k]fluorene) of the five the print Fluorine 2-Fluoroacetamide (Acetamide, 2-fluoro-) Fluoroacetic acid, sodium salt [Acetic acid. fluoro-, sodium salt) Formaldehyde (Methylene oxide) Formic acid (Methanoic acid) Glycidylaldehyde (1-Propanol-2,3-epoxy) Halomethane, N.O.S.* Heptachlor (4,7-Methano-1H-indene, 1,4,5,6,7,8,8-heptachloro-3a,4,7,7atetrahydro-) Heptachlor epoxide (alpha, beta, and gamma isomers) (4.7-Methano-1H-indene. 1,4,5,6,7,8,8-heptachloro-2,3-epoxy-3a,4,7,7tetrahydro-, alpha, beta, and gamma

7,12-Dimethylbenz[a]anthracene (1,2-

Benzanthracene, 7,12-dimethyl-)



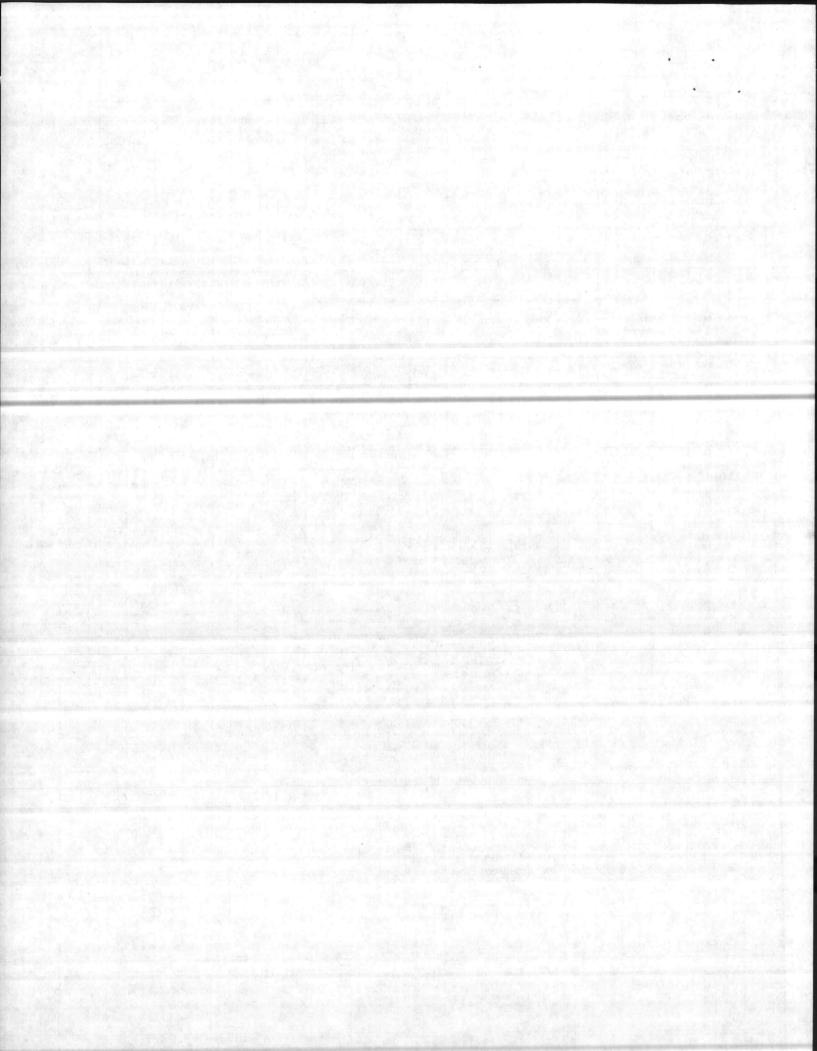
Hexachlorobenzene (Benzene, hexachloro-) Hexachlorobutadiene (1.3-Butadiene, 1.1.2.3.4.4-hexachloro-) Hexachlorocyclohexane (all isomers) (Lindane and isomers)
Hexachlorocyclopentadiene (1,3-Cyclopentadiene, 1,2,3,4,5,5-hexachloro-1 Hexachloroethane (Ethane, 1.1,1,2,2,2hexachloro-l 1.2,3.4.10.10-Hexachloro-1,4.4a,5,8,8ahexahydro-1.4:5.8-endo.endodimethanonaphthalene (Hexachlorohexahydro-endo,endodimethanonaphthalene) Hexachlorophene (2.2'-Methylenebis(3,4,6trichlorophenol)) in any with Hexachloropropene (1-Propene, 1,1,2,3,3,3hexachloro-) Hexaethyl tetraphosphate Tetraphosphoric acid, hexaethyl ester) Hydrazine (Diamine) Hydrocyanic acid (Hydrogen cyanide) Hydrofluoric acid (Hydrogen fluoride) Hydrogen sulfide (Sulfur hydride) Hydroxydimethylarsine oxide (Cacodylic acid) Indeno(1,2,3-cd)pyrene (1,10-(1,2-2-3-1) 3) acid) phenylene)pyrene) In phenylene)pyrene)
Iodomethane (Methyl iodide)
Iron dextran (Ferric dextran) Isocyanic acid, methyl ester (Methyl isocyanate) Isobutyl alcohol (1-Propanol, 2-methyl-) Isosafrole (Benzene, 1,2-methylenedioxy-4-allyl-) Kepone (Decachlorooctahydro-1,3,4-Methano-- 2H-cyclobuta[cd]pentalen-2-one) Lasiocarpine [2-Butenoic acid, 2-methyl-, 7-[(2,3-dihydroxy-2-[1-methoxyethyl]-3methyl-1-oxobutoxy)methyl]-2,3,5,7atetrahydro-1H-pyrrolizin-1-yl ester) Lead and compounds, N.O.S.* Lead acetate (Acetic acid, lead salt) Lead phosphate (Phosphoric acid, lead salt) Lead subacetate (Lead, bis(acetato- . , : :. O)tetrahydroxytri-) Maleic anhydride (2.5-Furandione) Maleic hydrazide (1,2-Dihydro-3,6pyridazinedione) pyridazinegionej
Malononitrile (Propanedinitrile) Melphalan (Alanine, 3-[p-bis(2chloroethyl)amino]phenyl-, L-) Mercury fulminate (Fulminic acid, mercury Mercury and compounds, N.O.S.* Methacrylonitrile (2-Propenenitrile, 2-methyl-Methanethiol (Thiomethanol) Methapyrilene (Pyridine, 2-[(2dimethylamino]ethyl]-2-thenylamino-] Metholmyl (Acetimidic acid, N-[[methylcarbamoyl]oxy]thio-, methyl ester Methoxychlor (Ethane, 1,1,1-trichloro-2,2'bis(p-methoxyphenyl)-) 2-Methylaziridine (1,2-Propylenimine) 3-Methylcholanthrene (Benz[j]aceanthrylene. 1.2-dihydro-3-methyi-) Methyl chlorocarbonate (Carbonochloridic acid, methyl ester) 4.4'-Methylenebis(2-chloroaniline) (Benzenamine, 4.4'-methylenebis-(2-chloro-) Methyl ethyl ketone (MEK) (2-Butanone) Methyl hydrazine (Hydrazine, methyl-) 2-Methyllactonitrile (Propanenitrile, 2hydroxy-2-methyl-) Methyl methacrylate (2-Propenoic acid, 2methyl-, methyl ester)

Methyl methanesulfonate (Methanesulfonic acid, methyl ester) 2-Methyl-2-(methylthio)propionaldchyde-o-(methylcarbonyl) oxime (Propanal, 2-methyl-2-(methylthio)-, O-[(methylamino)carbonyl]oxime) N-Methyl-N'-nitro-N-nitrosoguanidine (Guanidine, N-nitroso-N-methyl-N'-nitro-) Methyl parathion (O.O-dimethyl O-(4nitrophenyl) phosphorothicate) Methylthiouracil (4-1H-Pyrimidinone, 2,3dihydro-6-methyl-2-thioxo-) Mustard gas (Sulfide, bis(2-chloroethyl)-) Naphthalene 1,4-Naphthoquinone (1,4-Naphthalenedione) 1-Naphthylamine (alpha-Naphthylamine) 2-Naphthylamine (beta-Naphthylamine) 443 1-Naphthyl-2-thiourea (Thiourea, 1-naphthalenyl-) Nickel carbonyl (Nickel tetracarbonyl) Nickel cyanide (Nickel (II) cyanide) Nicotine and salts (Pyridine, (S)-3-(1-methyl-2-pyrrolidinyl)-, and salts) Nitric oxide (Nitrogen (II) oxide) p-Nitroaniline (Benzenamine, 4-nitro-) Nitrobenzine (Benzene, nitro-) Nitrogen dioxide (Nitrogen (IV) oxide) Nitrogen mustard and hydrochloride salt (Ethanamine, 2-chloro-, N-(2-chloroethyl)-N-methyl-, and hydrochloride salt) Nitrogen mustard N-Oxide and hydrochloride salt (Ethanamine, 2-chloro-, N-(2chloroethyl)-N-methyl-, and hydrochloride the Standard Company of the Standard Company Nitroglycerine (1,2,3-Propanetriol, trinitrate) 4-Nitrophenol (Phenol, 4-nitro-) 4-Nitroquinoline-1-oxide (Quinoline, 4-nitro-1oxide-) Nitrosamine, N.O.S. N-Nitrosodi-n-butylamine (1-Butanamine, N-butyl-N-nitroso-) N-Nitrosodiethanolamine (Ethanol, 2,2'-(nitrosoimino)bis-) N-Nitrosodiethylamine (Ethanamine, N-ethyl-N-nitroso-)
N-Nitrosodimethylamine (Dimethylnitrosamine) N-Nitroso-N-ethylurea (Carbamide, N-ethyl-N-nitroso-) and an extension of the second N-Nitrosomethylethylamine (Ethanamine, Nmethyl-N-nitroso-) N-Nitroso-N-methylurea (Carbamide, N-methyl-N-nitroso-) N-Nitroso-N-methylurethane (Carbamic acid. methylnitroso-, ethyl ester) N-Nitrosomethylvinylamine (Ethenamine, Nmethyl-N-nitroso-) N-Nitrosomorpholine (Morpholine, N-nitroso-N-Nitrosonornicotine (Nornicotine, Nnitroso-) N-Nitrosopiperidine (Pyridine, hexahydro-, Nnitroso-) Nitrosopyrrolidine (Pyrrole, tetrahydro-, Nnitroso-) N-Nitrososarcosine (Sarcosine, N-nitroso-) 5-Nitro-o-toluidine (Benzenamine, 2-methyl-5nitro-) Octamethylpyrophosphoramide (Diphosphoramide, octamethyl-) Osmium tetroxide (Osmium (VIII) oxide) 7-Oxabicyclo[2.2.1]heptane-2,3-dicarboxylic acid (Endothal) Paraldehyde (1,3,5-Trioxane, 2,4,6-trimethyl-)

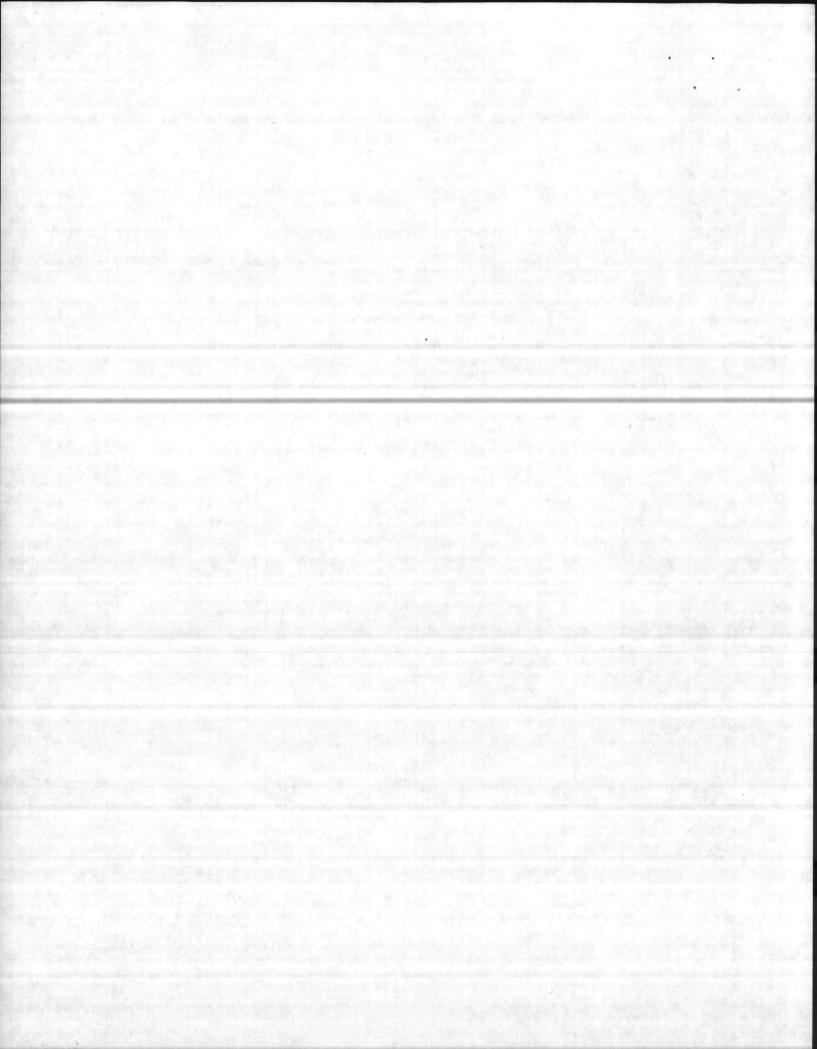
Pentachlorobenzene (Benzene, pentachloro-) Pentachloroethane (Ethane, pentachloro-) Pentachloronitrobenzene (PCNB) (Benzene, pentachloronitro-) Pentachlorophenol (Phenol, pentachloro-) Phenacetin (Acetamide, N-[4-ethoxyphenyl]-] Phenacetin (Acetamue, 1977)
Phenol (Benzene, hydroxy-) Phenol (Benzene, nyuroxy)
Phenylenediamine (Benzenediamine) Phenylmercury acetate (Mercury, acetatophenyl-) N-Phenylthiourea (Thiourea, phenyl-) Phosgene (Carbonyl chloride) Phosphine (Hydrogen phosphide) Phosphine (Hydrogen phosphide)
Phosphorodithiola acid, O,O-diethyl S[(ethylthio)methyl] ester (Phorate)
Phosphorothiola acid, O,O-dimethyl O-lp-[(dimethylamino)sulfonyl)phenyl] ester (famethylaminojsunonylaminojsun Phthalic anhydride (1,2-Benzenedicarboxylic acid anhydride)
2-Picoline (Pyridine, 2-methyl-)
Polychlorinated biphenyl, N.O.S.
Potassium cyanide
Potassium silver cyanide (Argentate(1-), dicyano-, potassium) Pronamide (3.5-Dichloro-N-[1,1-dimethyl-2propynyl]benzamide) ,3-Propane sultone (1,2-Oxathiolane, 2,2- dioxide) ministration in the control of the control n-Propylamine (1-Propanamine) Propylthiouracil (Undecamethylenediamine, N,N'-bis(2-chlorobenzyl)-, dihydrochloride) 2-Propyn-1-ol (Propargyl alcohol) Pyridine 1988 Towns University also Take Reserpine (Yohimban-16-carboxylic acid, itrimethoxybenzoyl]oxy]-, methyl ester] Resorcinol (1,3-Benzenediol) Saccharin and salts (1,2-Benzoisothiazolin-3one, 1.1-dioxide, and salts) Safrole (Benzene, 1,2-methylenedioxy-4-allyl-) Selenious acid (Selenium dioxide)
Selenium and compounds, N.O.S. Selenium sulfide (Sulfur selenide) Selenourea (Carbamimidoselenoic acid) Silver and compounds, N.O.S.*
Silver cyanide
Sodium cyanide Streptozotocin (D-Glucopyranose, 2-deoxy-2-(3-methyl-3-nitrosoureido)-) Strontium sulfide Strychnine and salts (Strychnidin-10-one, and salts 2,4,5-Tetrachlorobenzene (Benzene, 1,2,4,5 tetrachloro-1 3.7.8-Tetrachlorodibenzo-p-dioxin (TCDD) (Dibenzo-p-dioxin, 2,3.7,8-tetrachloro-) Tetrachloroethane, N.O.S.* (Ethane, tetrachloro-, N.O.S.*) 1,1,2-Tetrachlorethane (Ethane, 1,1,1,2tetrachloro-1 1.2,2-Tetrachlorethane (Ethane, 1.1,2,2tetrachloro-) Tetrachlorethane (Ethene, 1.1,2,2-tetrachloro-) Tetrachloromethane (Carbon tetrachloride) 2,3.4,6,-Tetrachlorophenol (Phenol, 2,3,4,6tetrachloro-) Tetraethyldithiopyrophosphate (Dithiopyrophosphoric acid, tetraethylester) Tetraethyl lead (Plumbane, tetraethyl-) Tetraethylpyrophosphate (Pyrophosphoric acide, tetraethyl ester)

Parathion (Phosphorothioic acid, O,O-diethy)

O-(p-nitrophenyl) ester



Tetranitromethane (Methane, tetranitro-) Thallium and compounds, N.O.S. Thallic oxide (Thallium (III) oxide) Thallium (I) acetate (Acetic acid. thallium (I) Thallium (I) carbonate (Carbonic acid. dithallium (I) salt) Thallium (I) chloride Thallium (I) nitrate (Nitric acid, thallium (I) salt) · Thallium sclenite Thallium (I) sulfate (Sulfuric acid, thallium (I) salt) Thioacetamide (Ethanethioamide) Thiosemicarbazide - (Hydrazinecarbothioamide) Thiourea (Carbamide thio-) Thiuram (Bis(dimethylthiocarbamoyl) disulfide) Toluene (Benzene, methyl-) Toluenediamine (Diaminotoluene)
o-Toluidine hydrochloride (Benzenamine, 2methyl-, hydrochloride) Tolylene diisocyanate (Benzene, 1.3-diisocyanatomethyl-) Toxaphene (Camphene, octachloro-) Tribromomethane (Bromoform) 1.2.4-Trichlorobenzene (Benzene. 1.2.4trichloro-) 1,1.1-Trichloroethane (Methyl chloroform) 1,1.2-Trichloroethane (Ethane, 1,1.2-trichloro-) Trichloroethene (Trichloroethylene) Trichloromethanethiol (Methanethiol. trichloro-) Trichloromonofluoromethane (Methane, trichlorofluoro-) 2.4.5-Trichlorophenol (Phenol. 2,4.5-trichloro-) 2.4.6-Trichlorophenol (Phenol, 2.4.6-trichloro-) 2.4.5-Trichlorophenoxyacetic acid (2.4.5-1) (Acetic acid, 2,4,5-trichlorophenoxy-) 2.4.5-Trichlorophenoxypropionic acid (2.4,5-TP) (Silvex) (Propionoic acid, 2-(2,4,5trichlorophenoxy)-) Trichloropropane. N.O.S.* (Propane. trichloro-, N.O.S.*) 1.2,3-Trichloropropane (Propane, 1.2,3trichloro-) O.O.O-Triethyl phosphorothicate (Phosphorothioic acid, O.O.O-triethyl ester) sym-Trinitrobenzene (Benzene, 1,3,5-trinitro-) Tris(1-azridinyl) phosphine sulfide (Phosphine sulfide, tris(1-aziridinyl-) Tris(2.3-dibromopropyl) phosphate (1-Propanol, 2,3-dibromo-, phosphate)
Trypan blue (2,7-Naphthalenedisulfonic acid, 3.3'-[(3.3'-dimethyl(1.1'-biphenyl)-4.4'diyl)bis(azo)]bis(5-amino-4-hydroxy-. tetrasodium salt) Uracil mustard (Uracil 5-[bis(2chloroethyl)amino]-) Vanadic acid, ammonium salt (ammonium Vanadium pentoxide (Vanadium (V) oxide) Vinyl chloride (Ethene, chloro-) Zinc cyanide Zinc phosphide



From: Commanding General

To: Distribution

Subj: Reporting releases of hazardous substances pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA)

Ref: (a) The Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), 42 U.S.C. 9601-57

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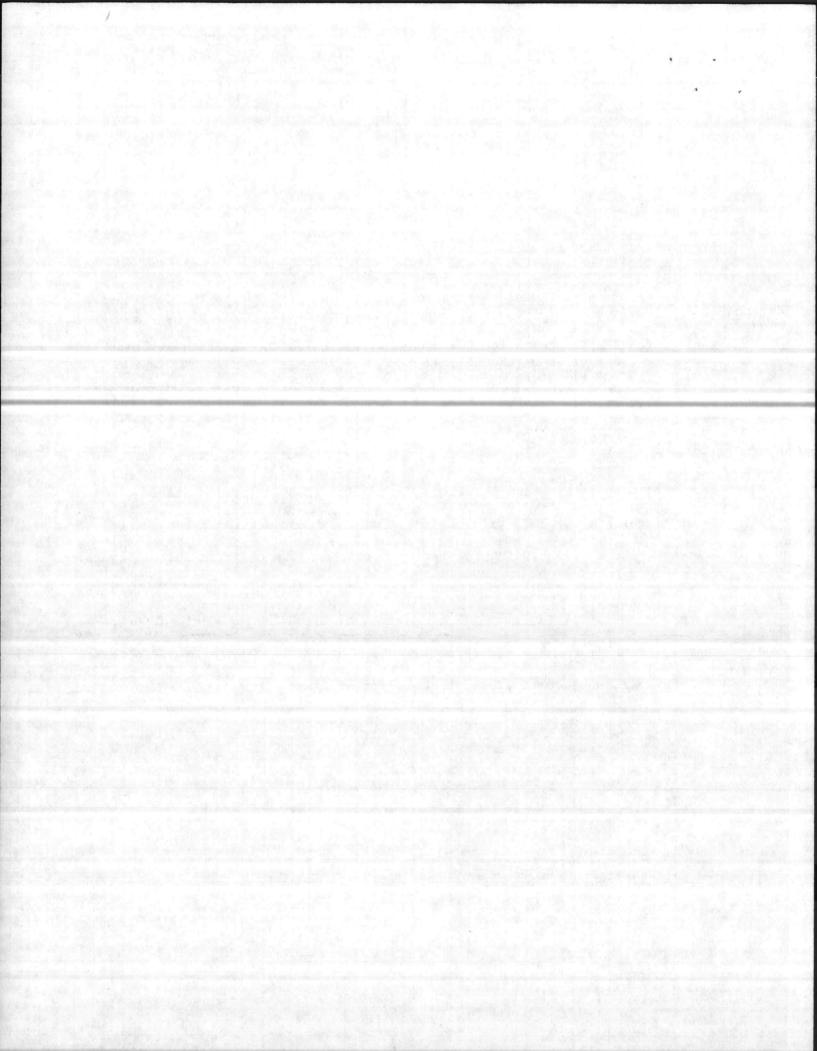
(b) MCO P11000.8A

Encl: (1) List of hazardous substances subject to CERCLA release reporting requirements

1. Background. In 1980, Congress enacted the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), reference (a), which is applicable to not only private individuals and corporations, but the United States Government, including the Marine Corps, and its officers and employees. CERCLA provides that all "releases" into "the environment" of the substances listed in enclosure (1) must be immediately reported to the National Response Center. Failure to make the report required by CERCLA is a criminal offense. Violators are subject to prosecution in United States District Court or under the Uniform Code of Military Justice, as appropriate.

2. Information. The following definitions apply:

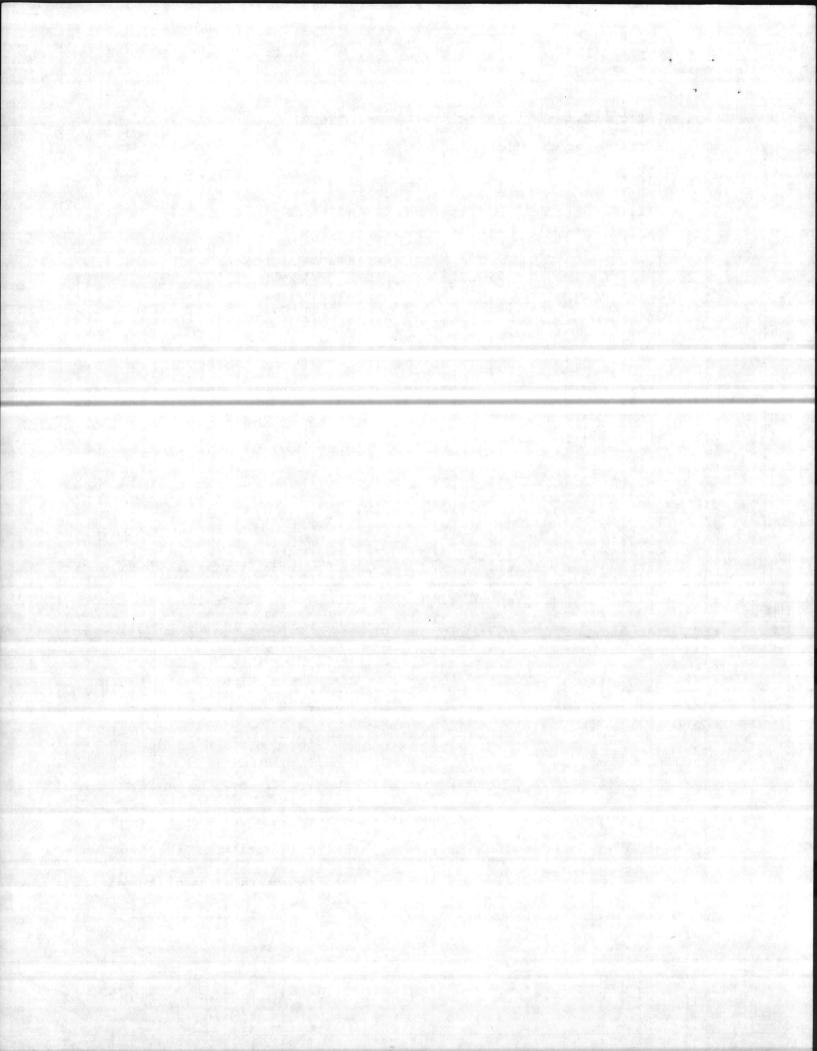
a. Release means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the
environment.



- b. Environment means navigable waters, any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States. It specifically includes all parts of Camp Pendleton.
- c. Report means to inform the designated CERCLA Report Officer as soon as possible, either by telephone or other expeditious means, of any release of a hazardous substance.
- d. <u>Hazardous substance(s)</u> means all of those materials listed in enclosure
 (1) in the quantities listed.

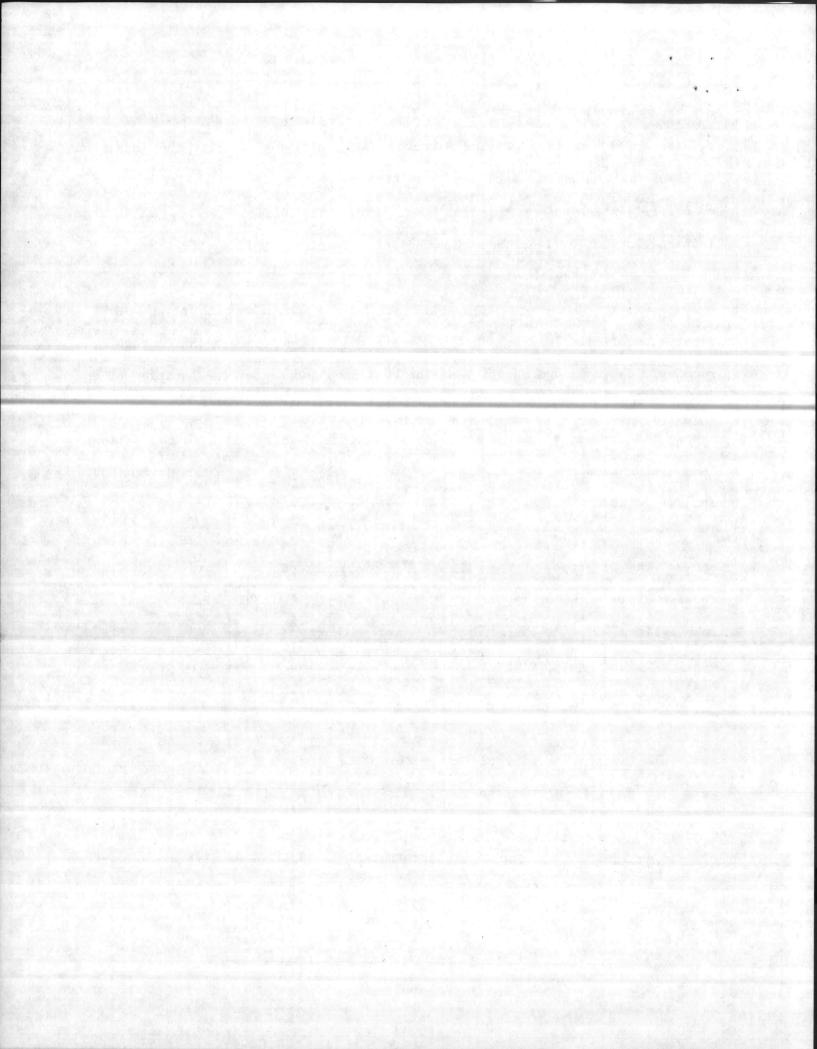
3. Action

- a. All persons at Marine Corps Base, Camp Pendleton, having knowledge of a release of any of the hazardous substances listed on enclosure (1) shall report the matter as soon as possible to the Director, Natural Resources Office at Building 25154, telephone 4512.
 - b. Director, Natural Resources Office
- (1) The Director, NRO, is the CERCLA Report Officer. He shall receive reports of releases of hazardous material. Upon verifying the location of any reported release and the identity, date, time and quantity of the hazardous substance released, the Director, NRO, will report all releases in reportable quantitites to the National Response Center. The initial report will be by



telephone, (800) 424-8802, with confirmation by message. See Figure P-2 of reference (b) for format. The Director, NRO, will also notify the Assistant Chief of Staff, Facilities, and the Director, Joint Public Affairs Office, upon verification of a reportable release. The Director, NRO, will also initiate action in accordance with the Spill Contingency Plan (SCP).

- (2) The Director, NRO, shall maintain a permanent log of all CERCLA reports received. This log shall indicate the date and time a CERCLA report is received, the name and quantity of the hazardous substance, the location of the release, the name, rank, duty address, and telephone number of the individual making the report, the date and time the release was reported to the National Response Center, and the name of the individual contacted at the National Response Center.
- c. The Director, JPAO, will take appropriate public affairs action upon receipt of a verified report of a release in a reportable quantity and will make liaison with the Director, NRC, and with the Assistant Chief of Staff, Staff Judge Advocate to determine if a notice of the release must be published in a local newspaper.
- 4. <u>Dissemination</u>. A copy of this order shall be delivered to all persons who work with hazardous substances. A copy of this order will be posted on appropriate bulletin boards and will be made a part of turn-over files for billets designated by the Assistant Chief of Staff, Facilities, and the Assistant Chief of Staff, Logistic and Supply Services.



5. Application. By previous agreement this order applies to all commands and tenant activities at Camp Pendleton, California, and to all persons on the installation.

W. J. WOODRING, JR.

Chief of Staff

DISTRIBUTION:

