FILE FOLDER

DESCRIPTION ON TAB:

6240 Hazardous Waste

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Confidential Records Management, Inc.
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RDOUS WASTE

01 JAN 1980

JAN 1983 - DESTROY
SECNAVINST 5212.5B, Part II, Chap 6,
par. 6240(1)
Retention - 2 years

	ACTION	INFO	INITIAL
		24 JAN 1980	
BMO		✓	B. Day
ABMO		✓	BDR
MAINT NCO			
SAFETY CHMN			
PROP			
M&R			
OPNS			
ADMIN		✓	S
TELE			
UTIL		✓	
ENVIRON AFF	✓		
SECRETARY			
F&A BRANCH			
UMACS			

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 1-23-80

TO:

[BASE MAINT O]
PUBLIC WORKS O
COMM-ELECT O
MOTOR TRANSPORT O

DIR, QUARTERS & HOUSING
DIR, BOQ/BSQ
BASE FIRE CHIEF

ATTN: _____

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. Millie J

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

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

LEE-bp/PGF
6240
15 JAN 1980

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

Subj: Chemical Waste; disposal of

Ref: (a) CG Camp Lejeune ltr MAIN/JIW/th over 6240 dtd 25 Oct 1979

Encl: (1) List of Hazardous Materials to be disposed of at the Cherry Point Industrial Waste Treatment Plant for MAG-26 and MAG-29, MCAS(H); New River, Jacksonville, NC

1. Reference (a) requested that chemicals listed on enclosure (1) be disposed of at the Cherry Point Industrial Waste Treatment Plant (CPIWTP) and that a program be established for disposal of chemical waste generated by Marine Corps Base, Camp Lejeune and Marine Corps Air Station (H), New River.

2. Enclosure (1) notes those chemicals which can be accepted for treatment at the CPIWTP and those which cannot be accepted. Acceptable chemicals should be delivered to the CPIWTP at any time, Monday through Friday, 0730 to 1600. Note that most chemicals listed on enclosure (1) require chemical analysis before a determination can be made as to acceptability.

3. Information concerning acceptance of chemical waste at the CPIWTP is provided in the following paragraphs:

a. Chemicals vary so greatly that many require special treatment. The CPIWTP was designed to treat chemicals such as the phenol group, amonia base strippers, plating compounds containing heavy metals and weak acids and bases, limited quantities of oil and grease, and certain aircraft cleaning detergents. Batch treatment is available for concentrated acids and bases and for chemicals containing chromium and cyanide. Solvents are not acceptable at the CPIWTP.

b. Total loads which can be sent to the CPIWTP are restricted two ways; hydraulics and total chemical load. A directly proportional relation exists between hydraulic and chemical load limitations, i.e., as the hydraulic load (total wastewater flow) increases, the chemical load increases. The sanitary and mechanical engineering design of the CPIWTP limits the total hydraulic capacity. In general, Environmental

Protection Agency (EPA) effluent limitations imposed on Cherry Point by regulatory permit limit the chemical loading. The chemical limitations directly affect the ability to load the CPIWTP with certain chemical groups, compounds and elements. For example, phenols loading to the CPIWTP cannot exceed 4 gallons per day and oil loading to the CPIWTP cannot exceed 5 gallons per day in order to satisfy EPA permit requirements.

c. Some chemical waste will require analysis to determine chemical content and strength. The analysis will be used to determine acceptability for treatment at the CPIWTP. Submitting activities will be required to submit chemical analysis upon request.

d. Chemical waste can be disposed of by private contractor. In some cases, contractors will pay for waste chemicals (especially oils) which have been segregated from other chemicals and which have not exceeded their shelf life. The address of a few of these contractors can be provided upon request. The Defense Property Disposal Office also accepts certain hazardous waste, but only on a case by case basis and only if the waste has utilization or sales value.

e. Atlantic Division, Naval Facilities Engineering Command (LANTDIV) is the technical expert for obtaining contracting services for chemical analysis and disposal of chemical waste. Activities requiring these services can turn to LANTDIV for help in obtaining the service.

4. In accordance with the above information, the following policy concerning acceptance of chemical waste at the CPIWTP is established:

a. MCAS, Cherry Point will accept certain chemicals from Marine Corps Base, Camp Lejeune and from MCAS(H), New River on a case by case basis. Contact should be made with Mr. John Floyd, Autovon 582-4261 when chemical waste requires disposal. Mr. Floyd will make the determination as to acceptability at the CPIWTP based on considerations noted in paragraphs 3a, 3b and 3c above.

b. Oil and grease will not be accepted for disposal at CPIWTP.

c. Chemical waste not accepted at MCAS, Cherry Point should be handled in accordance with paragraphs 3d and 3e above.

H. A. ZANDER
By Direction

LIST OF HAZARDOUS MATERIALS TO BE DISPOSED OF AT THE CHERRY POINT INDUSTRIAL WASTE TREATMENT PLANT FOR MAG-26 AND MAG-29
MCAS(H), NEW RIVER, JACKSONVILLE, NORTH CAROLINA

NOMENCLATURE	QTY	CATEGORY	NOT ACCEPTABLE	LACK OF INFO MAY REQUIRE CHEMICAL ANALYSIS	ACCEPTABLE	COMMENTS
1. Cleaning Compound	220 gal	Detergent		X		Heavy Metals Phenols Limitation
2. Dry Cleaning Solvent (Petroleum Naphtha)	25 gal	Solvent	X			
3. Cleaning Compound Aircraft Service	16 gal	Detergent		X		Heavy Metals Phenols Limitation
4. Engine Lube Oil	55 gal	Oil	X			Oil Limitation of 5 gal/day
5. " " "	220 gal	Oil	X			Oil Limitation of 5 gal/day
6. " " "	55 gal	Oil	X			Oil Limitation of 5 gal/day
7. Toulene Technical	110 gal	Solvent	X			
8. Methyl Ketone	55 gal	Solvent	X			
9. Paint Remover	55 gal	Possible Phenol		X		Unacceptable if solvent base; acceptable if chromium non-phenol base

LIST OF HAZARDOUS MATERIALS TO BE DISPOSED OF AT THE CHERRY POINT INDUSTRIAL WASTE TREATMENT PLANT FOR MAG-26 AND MAG-29
MCAS(H), NEW RIVER, JACKSONVILLE, NORTH CAROLINA

NOMENCLATURE	QTY	CATEGORY	NOT ACCEPTABLE	LACK OF INFO MAY REQUIRE CHEMICAL ANALYSIS	ACCEPTABLE	COMMENTS
10. Cleaning Compound Solvent	55 gal	Detergent		X		Heavy Metals Phenols Limitation
11. Ammonium Hydroxide Technical	58 gal	Base			X	No Limit
12. Corrosion Preventative Compound (Petroleum Base)	80 gal	N/A		X		Lack of Info to catagorize
13. Sulfuric Acid Electrolyte	65 gal	Acid			X	No Limit
14. Trichlorethane	10 gal	Solvent	X			
15. Corrosion Preventative (Aircraft Engine)	5 gal	N/A		X		Lack of Info to catagorize
16. Unknown Substance	80 gal	N/A		X		Lack of Info to catagorize
17. Ammonia based paint stripper	100 gal	Ammonia base stripper		X		Heavy Metals Limitation
18. Mixture of: ammonia base stripper lacquer paint lacquer thinner enamel paint enamel thinner	320 gal	N/A	X			Paints and Thinners unacceptable

HEADQUARTERS, MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA

Date 31 Dec 80

From: Assistant Chief of Staff Facilities
To: Base Maintenance Officer

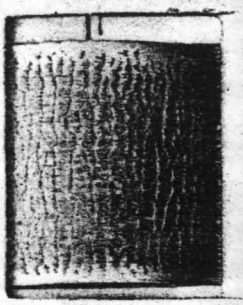
Subj: Support Agreemat w/COMCAB EAST; changes to it pertains to HW.

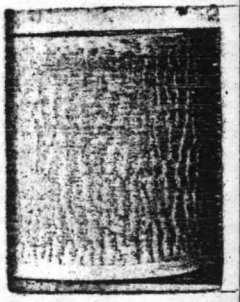
1. Lets get the proposed changes to the Support Agreement together based on recent procedure changes and our discussions with MCAS(H) New River.

2. SJA says they will ~~not~~ now go along with what we want to do based on the 6 Nov 80 ltr from HQMC.

K. P. Millhiser

MCBCL 5216/9





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

IN REPLY REFER TO

LFF-2:PCH:yum

6 NOV 1980

From: Commandant of the Marine Corps
To: Commanding General, Marine Corps Base,
Camp Lejeune NC 28586

Subj: Marine Corps Compliance with Hazardous Waste Regulations

Ref: (a) MCO P11000.8A
(b) COMCABEAST/MCB Camp Lejeune Logistic Support Service Agreement Revision No. 1 of March 1977
(c) 40 CFR Parts 260 to 265 and 122 to 124 of 19 May 1980
(d) MCBul 6280 of 1 Oct 1980

Encl: (1) Recommended Content for a Memorandum of Understanding Regarding Non-contiguous Activity Requirements for Compliance with Hazardous Waste Management Regulations

1. Reference (a) establishes policy and implements a program for protection of the environment within the Marine Corps. The Order recommends designation of single responsibility for the management of natural resources and environmental affairs for MCB Camp Lejeune and MCAS(H) New River. This was accomplished within a Logistic Support Service Agreement between the two facilities, most recently updated by reference (b). A national program to ensure proper handling and disposal of hazardous wastes was established by reference (c). The unique notification and reporting requirements associated with these regulations create ambiguity regarding the responsibilities of MCB Camp Lejeune and MCAS(H) New River as set forth in references (a) and (b). This letter provides guidance to ensure full compliance with the Resource Conservation and Recovery Act (RCRA) implementing regulations while maintaining the MCB Camp Lejeune service support role to the maximum extent practicable. It is recommended that the guidance provided herein be incorporated into the next update of reference (b).

2. The RCRA program provides a cradle-to-grave (generation to ultimate disposal) approach for the management of hazardous wastes. Administrative procedures associated with these regulations include certain notification, permitting and annual reporting requirements which must be met within specific time frames by generators, transporters, storers, processors, and disposers of hazardous wastes. Normally, these requirements would be the responsibility of MCB Camp Lejeune. The implementing regulations require, however, that activities physically separated by public access roads, who generate hazardous wastes in excess of the

LFF-2PCH:yum
6 NOV 1980

Subj: Marine Corps Compliance with Hazardous Waste Regulations

quantities established in the implementing regulations, file separately a "Notification of Hazardous Waste Activity" form and comply with other administrative requirements, regardless of the internal management system established for handling hazardous wastes.

3. Reference (a) directs Marine Corps activities to comply with the spirit as well as the letter of all Federal environmental laws. This policy is extended to State and local environmental requirements by reference (d). (RCRA provides for state implemetation of this program when consistency requirements are met). In order to comply with the RCRA implementing regulations, MCB Camp Lejeune and MCAS(H) New River will ensure that the administrative procedures required under these regulations are met. To accomplish this, it is suggested that a Memorandum of Understanding (MOU) be established between the two Commands, delineating each activity's responsibilities for implementation of the hazardous waste management regulations. The recommended content of such a MOU, that minimizes the administrative requirements of MCAS(H) New River, is provided as the enclosure. It must be emphasized that while the designated single point of responsibility for environmental matters (i.e. MCB Camp Lejeune) can provide technical and administrative assistance to non-contiguous facilities generating quantities of hazardous wastes in excess of that specified in the regulations, the RCRA regulations require that the ultimate responsibility for proper management of hazardous wastes still rests with the non-contiguous activity (i.e. MCAS(H) New River).

4. Clarification of the special circumstances created by these regulations will be included in the next update to reference (a). Questions regarding this matter should be directed to Mr. Paul Hubbell, the Headquarters Marine Corps point of contact for implementation of the hazardous materials environmental management program. Mr. Hubbell can be reached on Autovon 224-1425/ 2171.

F. E. Petersen

Frank E. PETERSEN
By direction

Copy to:
COMCABEAST
MCAS(H) NEW RIVER

Recommended Content for a Memorandum of Understanding Regarding Non-contiguous Activity Requirements for Compliance with Hazardous Waste Management Regulations

MCB Camp Lejeune/MCAS(H) New River responsibilities in a support service agreement for compliance with RCRA implementing regulations should include the following:

MCB Camp Lejeune shall:

1. Designate an activity focal point regarding hazardous wastes.

done 2. Assist MCAS(H) New River in preparation of EPA "Notification of Hazardous Waste Activity" form.

3. Provide guidance/material support to ensure proper short term (less than ninety days) storage of generated hazardous wastes at MCAS(H) New River.

4. Accept MCAS(H) New River generated hazardous wastes that have been properly packaged and documented.

5. Complete storage/processing/and disposal actions for MCAS(H) New River generated hazardous wastes.

6. Maintain sufficient records regarding transport/storage/processing/and disposal of MCAS(H) New River generated hazardous wastes.

7. Provide guidance as required regarding preparation and submission of annual hazardous waste reports.

8. Provide technical assistance and environmental protection support to MCAS(H) New River regarding Spill Prevention Control and Countermeasures (SPCC) Plan and Hazardous Waste Management Plan development and implementation.

9. Include MCAS(H) New River in an area-wide Oil/Hazardous Material spill contingency plan.

MCAS(H) New River shall:

1. Designate an activity focal point regarding hazardous wastes.

Done 2. Prepare and forward (with MCB Camp Lejeune support) the EPA "Notification of Hazardous Waste Activity" form.

3. Properly package and provide short term (less than ninety days) storage for hazardous wastes generated.

4. Deliver hazardous wastes, properly packaged and documented, to MCB Camp Lejeune ultimate disposal action.

Enclosure (1)

5. Provide required manifest documentation and maintain appropriate records of such shipments.

6. Prepare (with MCB Camp Lejeune assistance), sign, and forward annual hazardous waste management reports required by EPA.

7. Implement and enforce a Spill Prevention, Control, and Countermeasures Plan and the Hazardous Waste Management Plan.

8. Assist, as required, in implementing an area-wide Oil/ Hazardous Material spill contingency plan.

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

IN REPLY REFER TO
MAIN/DDS/th
6240
JUL 2 9 1980

From: Commanding General
To: Distribution List

Subj: Hazardous Material Management Program at Camp Lejeune

Ref: (a) Resource Conservation and Recovery Act (RCRA) (Pub. L. No. 94-580) (42 USC 6901-6987) (NOTAL)
(b) MCBul 6280 of 1 May 1980

Encl: (1) Hazardous Material Management Program, Part I
(2) Hazardous Material Management Program, Part II
(3) Hazardous Material Management Program, Part III
(4) Hazardous Material Management Program, Part IV

1. Hazardous waste and hazardous material management is a controversial national issue. Regulations recently developed by regulatory agencies of federal and state level will impact on several functions at Camp Lejeune. All Commands are requested to designate a point of contact with authority to represent the Command during program development to ensure compliance with requirements of references (a) and (b).

2. Enclosures (1), (2), (3) and (4) are forwarded for action. Information requested is required to implement the subject program and to meet deadlines established by references (a) and (b).

3. Addressees are requested to initiate action required to provide complete and accurate data as outlined on enclosures. Enclosure (1) should be forwarded directly to the Base Maintenance Officer no later than 11 August 1980. Enclosures (2), (3) and (4) should be submitted through the chain of command to the Base Maintenance Officer by 1 October 1980.

4. Technical assistance with conducting surveys and inventories needed to gather data is available from Natural Resources and Environmental Affairs Division, Base Maintenance Department. Point of contact is Mr. Danny Sharpe, extensions 5003 or 2083.

T. R. BAISLEY
By direction

DISTRIBUTION:

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CO, NRDC
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HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART I
LISTING OF HAZARDOUS WASTES[1] GENERATED LOCALLY

Activity _____ Contact _____ Phone No. _____

(A) Hazardous Wastes Currently Identified	(B)[2] (✓)	(C)[3] Waste Lubricants & Hydraulic Fluids Item/National Stock No. (NSN)	(D)[3] All Other Wastes Item/National Stock No. (NSN)
Acetic Acid			
Acetone			
Ammonia			
Asbestos			
Calcium Hydroxide			
Calcium Hypochlorite			
DDT			
Ferric Chloride			
Formaldehyde			
Hydrochloric Acid			
Lead Based Paints			
Lithium Sulfur Dioxide Batteries			
Mercury			
Methyl Ethyl Ketone (MEK)			
PCB			
Pentachlorophenol			
Perchloroethylene			
Sulfuric Acid			
Toluene			
Trichloroethane			
Trichloroethylene			
Xylene			

Note 1: Wastes also include materials unusable because shelflife has expired & which cannot be used for other purposes.

Note 2: Enter a check beside wastes shown in column A which your Command generates.

Note 3: List Names (or descriptions) & National Stock No.'s of hazardous wastes your Command generates which are not listed in Column A.

- ATTACH ADDITIONAL SHEETS

ENCLOSURE (1)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART II
EXISTING AND PLANNED HAZARDOUS WASTE AND
DISCARDED HAZARDOUS MATERIAL STORAGE AREAS

Activity _____ Contact _____ Phone No. _____

Storage Site Location & UIC[1]	Waste Name or Description[2]	National Stock Number (NSN)	Amount to be Stored[3]	Describe Facility Construction; Type of Containers Used; Adequacy of Facility; Safety & Spill Control Measures (Existing and Needed); comments

1. Give Building, Lot, or Structure No. and the Name of Unit in Charge (UIC) of Facility.

2. Show all Items Presently Stored at the Site.

3. Note that this should not exceed largest amount normally expected to be stored for any given 90-day period. Give pounds or gallons of each waste shown.

ENCLOSURE (2)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART III
GENERATORS OF HAZARDOUS WASTES[1]

Activity _____ Contact _____ Phone No. _____

Facility[2] _____

A Wastes Generated[3]	B Volume Generated (Average)[4]	C Volume Generated (Maximum)[5]	D Location of Interim Storage[6]	E Building No.	F Type Container Used[7]	G Describe Method Used For Final Disposal[8]

*See reverse side for instructions.

ENCLOSURE (3)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART III

Instructions: Complete form shown on reverse side of this sheet as follows:

*1. Fill out separate form(s) for each site or facility.

2. Building numbers and the units involved should be shown. Example: Building 1601; Motor Transport Maintenance Company and Component Rebuild Platoon, General Support Maintenance Company; 2d Maintenance Battalion; 2dFSSG. Do not group units not in same Command.

3. List each significant waste separately and complete columns C through G for each.

4. Give best estimate of the average volume or weight of waste produced during a fiscal year.

5. Give best estimate of the maximum volume or weight producted during a fiscal year quarter (90-day period).

6. Complete columns D and E only if wastes are stored at location other than on the site indicated by footnote 2.

7. Examples: 55 gallon barrel, 550 gallon steel tank, cardboard boxes, gallon glass jugs, etc.

8. Examples: Delivered to DPDO; placed in waste oil drums (550 gal); stored at Lot #140; picked up by private contractor.

*Refers to footnotes depicted on form.

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART IV
INVENTORY OF HAZARDOUS MATERIALS STORAGE AREAS[1]

Activity _____ Contact _____ Phone No. _____

Building or Lot No. _____ Location _____ Unit in Charge _____

Materials Stored (List Hazardous Materials)	National Stock Number (NSN)[2]	Volume/Weight Normally on Hand[3]	Volume/Weight Handled Annually[3]	Type Container	Describe the following: Type of construction; measures taken to prevent & cleanup spill; adequacy of facility.

Note:

1. List each site or facility on separate sheet
2. Some materials have several NSN's. List each NSN applicable.
3. Give best estimate available.

ENCLOSURE (4)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART I
LISTING OF HAZARDOUS WASTES[1] GENERATED LOCALLY

Activity _____ Contact _____ Phone No. _____

(A)	(B)[2]	(C)[3]	(D)[3]
Hazardous Wastes Currently Identified	(✓)	Waste Lubricants & Hydraulic Fluids Item/National Stock No. (NSN)	All Other Wastes Item/National Stock No. (NSN)
Acetic Acid			
Acetone			
Ammonia			
Asbestos			
Calcium Hydroxide			
Calcium Hypochlorite			
DDT			
Ferric Chloride			
Formaldehyde			
Hydrochloric Acid			
Lead Based Paints			
Lithium Sulfur Dioxide Batteries			
Mercury			
Methyl Ethyl Ketone (MEK)			
PCB			
Pentachlorophenol			
Perchloroethylene			
Sulfuric Acid			
Toluene			
Trichloroethane			
Trichloroethylene			
Xylene			

Note 1: Wastes also include materials unusable because shelflife has expired & which cannot be used for other purposes.

Note 2: Enter a check beside wastes shown in column A which your Command generates.

Note 3: List Names (or descriptions) & National Stock No.'s of hazardous wastes your Command generates which are not listed in Column A.

- ATTACH ADDITIONAL SHEETS

ENCLOSURE (1)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART II
EXISTING AND PLANNED HAZARDOUS WASTE AND
DISCARDED HAZARDOUS MATERIAL STORAGE AREAS

Activity _____ Contact _____ Phone No. _____

Storage Site Location & UIC[1]	Waste Name or Description[2]	National Stock Number (NSN)	Amount to be Stored[3]	Describe Facility Construction; Type of Containers Used; Adequacy of Facility; Safety & Spill Control Measures (Existing and Needed); comments

1. Give Building, Lot, or Structure No. and the Name of Unit in Charge (UIC) of Facility.

2. Show all Items Presently Stored at the Site.

3. Note that this should not exceed largest amount normally expected to be stored for any given 90-day period. Give pounds or gallons of each waste shown.

ENCLOSURE (2)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART III
GENERATORS OF HAZARDOUS WASTES[1]

Activity _____ Contact _____ Phone No. _____

Facility[2] _____

A Wastes Generated[3]	B Volume Generated (Average)[4]	C Volume Generated (Maximum)[5]	D Location of Interim Storage[6]	E Building No.	F Type Container Used[7]	G Describe Method Used For Final Disposal[8]

*See reverse side for instructions.

ENCLOSURE (3)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART III

Instructions: Complete form shown on reverse side of this sheet as follows:

*1. Fill out separate form(s) for each site or facility.

2. Building numbers and the units involved should be shown. Example: Building 1601; Motor Transport Maintenance Company and Component Rebuild Platoon, General Support Maintenance Company; 2d Maintenance Battalion; 2dFSSG. Do not group units not in same Command.

3. List each significant waste separately and complete columns C through G for each.

4. Give best estimate of the average volume or weight of waste produced during a fiscal year.

5. Give best estimate of the maximum volume or weight producted during a fiscal year quarter (90-day period).

6. Complete columns D and E only if wastes are stored at location other than on the site indicated by footnote 2.

7. Examples: 55 gallon barrel, 550 gallon steel tank, cardboard boxes, gallon glass jugs, etc.

8. Examples: Delivered to DPDO; placed in waste oil drums (550 gal); stored at Lot #140; picked up by private contractor.

*Refers to footnotes depicted on form.

ENCLOSURE (3)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART IV
INVENTORY OF HAZARDOUS MATERIALS STORAGE AREAS[1]

Activity _____ Contact _____ Phone No. _____

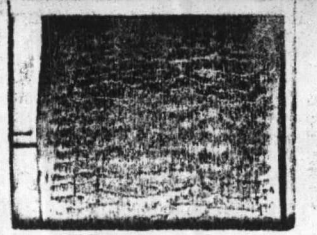
Building or Lot No. _____ Location _____ Unit in Charge _____

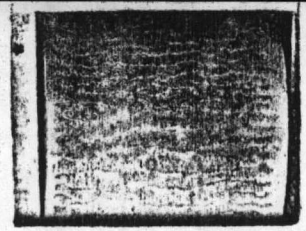
Materials Stored (List Hazardous Materials)	National Stock Number (NSN)[2]	Volume/Weight Normally on Hand[3]	Volume/Weight Handled Annually[3]	Type Container	Describe the following: Type of construction; measures taken to prevent & cleanup spill; adequacy of facility.

Note:

1. List each site or facility on separate sheet
2. Some materials have several NSN's. List each NSN applicable.
3. Give best estimate available.

ENCLOSURE (4)





HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART I
LISTING OF HAZARDOUS WASTES[1] GENERATED LOCALLY

Activity _____ Contact _____ Phone No. _____

(A) Hazardous Wastes Currently Identified	(B)[2] (✓)	(C)[3] Waste Lubricants & Hydraulic Fluids Item/National Stock No. (NSN)	(D)[3] All Other Wastes Item/National Stock No. (NSN)
Acetic Acid			
Acetone			
Ammonia			
Asbestos			
Calcium Hydroxide			
Calcium Hypochlorite			
Ferric Chloride			
Formaldehyde			
Hydrochloric Acid			
Lead Based Paints			
Lithium Sulfur Dioxide Batteries			
Mercury			
Methyl Ethyl Ketone (MEK)			
PCB			
Pentachlorophenol			
Perchloroethylene			
Sulfuric Acid			
Toluene			
Trichloroethane			
Trichloroethylene			
Xylene			

Note 1: Wastes also include materials unusable because shelflife has expired & which cannot be used for other purposes.

Note 2: Enter a check beside wastes shown in column A which your Command generates.

Note 3: List Names (or descriptions) & National Stock No.'s of hazardous wastes your Command generates which are not listed in Column A.

- ATTACH ADDITIONAL SHEETS

ENCLOSURE (1)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART II
EXISTING AND PLANNED HAZARDOUS WASTE AND
DISCARDED HAZARDOUS MATERIAL STORAGE AREAS

Activity _____ Contact _____ Phone No. _____

Storage Site Location & UIC[1]	Waste Name or Description[2]	National Stock Number (NSN)	Amount to be Stored[3]	Describe Facility Construction; Type of Containers Used; Adequacy of Facility; Safety & Spill Control Measures (Existing and Needed); comments

1. Give Building, Lot, or Structure No. and the Name of Unit in Charge (UIC) of Facility.
2. Show all Items Presently Stored at the Site.
3. Note that this should not exceed largest amount normally expected to be stored for any given 90-day period. Give pounds or gallons of each waste shown.

ENCLOSURE (2)

EXCESSED

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART III
GENERATORS OF HAZARDOUS WASTES[1]

Activity _____ Contact _____ Phone No. _____

Facility[2] _____

A Wastes Generated[3]	B Volume Generated (Average)[4]	C Volume Generated (Maximum)[5]	D Location of Interim Storage[6]	E Building No.	F Type Container Used[7]	G Describe Method Used For Final Disposal[8]

*See reverse side for instructions.

ENCLOSURE (3)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART III

Instructions: Complete form shown on reverse side of this sheet as follows:

*1. Fill out separate form(s) for each site or facility.

2. Building numbers and the units involved should be shown. Example: Building 1601; Motor Transport Maintenance Company and Component Rebuild Platoon, General Support Maintenance Company; 2d Maintenance Battalion; 2dFSSG. Do not group units not in same Command.

3. List each significant waste separately and complete columns C through G for each.

4. Give best estimate of the average volume or weight of waste produced during a fiscal year.

5. Give best estimate of the maximum volume or weight producted during a fiscal year quarter (90-day period).

6. Complete columns D and E only if wastes are stored at location other than on the site indicated by footnote 2.

7. Examples: 55 gallon barrel, 550 gallon steel tank, cardboard boxes, gallon glass jugs, etc.

8. Examples: Delivered to DPDO; placed in waste oil drums (550 gal); stored at Lot #140; picked up by private contractor.

*Refers to footnotes depicted on form.

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART IV
INVENTORY OF HAZARDOUS MATERIALS STORAGE AREAS[1]

Activity _____ Contact _____ Phone No. _____

Building or Lot No. _____ Location _____ Unit in Charge _____

Materials Stored (List Hazardous Materials)	National Stock Number (NSN)[2]	Volume/Weight Normally on Hand[3]	Volume/Weight Handled Annually[3]	Type Container	Describe the following: Type of construction; measures taken to prevent & cleanup spill; adequacy of facility.

Note:

1. List each site or facility on separate sheet
2. Some materials have several NSN's. List each NSN applicable.
3. Give best estimate available.

ENCLOSURE (4)

File
gdw

R Maas
PMAR
Norfolk

ASSISTANT SECRETARY OF DEFENSE
WASHINGTON, D.C. 20301

SR
MANPOWER, RESERVE AFFAIRS AND LOGISTICS

JAN 3 1980

MEMORANDUM FOR THE ASSISTANT SECRETARY OF THE ARMY (IL&FM)
ASSISTANT SECRETARY OF THE NAVY (MRA&L)

SUBJECT: Appointment of Precious Metals Coordinators

Department of Defense Directive 4160.22, "Recovery and Utilization of Precious Metals", 1 December 1976, established the DoD Precious Metals Recovery Program (PMRP) and assigned DoD components responsibility for participating in the program to the maximum extent possible. Over the years the PMRP has been reviewed by the General Accounting Office, the Defense Audit Service and most recently, by the Surveys and Investigations Staff of the Defense Subcommittee of the House Committee on Appropriations. Although improvements in the PMRP have been made, each of these reviews concluded that additional precious metals could be recovered.

We are of the opinion that the recovery of precious metals can be further enhanced by increasing PMRP management emphasis at all levels. Therefore, to supplement program promotion and management attention currently provided by the PMRP focal point functioning at each Service Headquarters level, we request that Precious Metals Coordinators be designated at the camp/post/station level to assist individual precious metal generating activities in the discharge of responsibilities outlined in Chapter XVII of the Defense Disposal Manual, DoD 4160.21M, pending more formal delineation of duties in a coordinated change to the manual.

cc: ASAF(RD&L)
Director, DLA

(Signed) Paul H. Riley
Deputy Assistant Secretary of Def
(Supply, Maintenance and Transport

6240

MAIN/DOS/th
6240
OCT 0 7 1980

From: Commanding General
To: Commander, Atlantic Division, Naval Facilities Engineering Command, Norfolk, Virginia 23511 (Code 114)

Subj: Marine Corps Hazardous Material Environmental Program

Ref: (a) MCOul 6280 of 1 May 1980
(b) Resource Conservation and Recovery Act (RCRA)

Encl: (1) Draft of Proposed Hazardous Waste Management Plan

1. Proposed local implementation of the subject program, as required by references (a) and (b), is outlined in enclosure (1) and is forwarded in accordance with reference (a). Enclosure (1) will be applicable to the following commands: Marine Corps Base, Marine Corps Air Station (Helicopter), New River, 2d Marine Division, 2d Force Service Support Group, Naval Regional Medical Center, Naval Regional Dental Center and Defense Property Disposal Office, Camp Lejeune, North Carolina.

2. The Hazardous Waste Management Survey is included in enclosure (1). Volume data is not included, although estimates of hazardous waste production have been obtained from each command. This data is currently being compiled and must be field checked. No problems are anticipated in having necessary data for completion of the required Environmental Protection Agency hazardous waste storage permit application due on 3 November 1980.

3. If assistance is required, please contact Mr. Danny Sharpe, Natural Resources and Environmental Affairs Division, Base Maintenance Department, (AUTOVON) 484-5003.

F. N. MOUNT
By direction

Copy to:
CMC (Code LFF-2)
CO MCAS(H) NR

OCT 0 2 1980

MEMO ROUTING SLIP	NEVER USE FOR APPROVALS, DISAPPROVALS, CONCURRENCES, OR SIMILAR ACTIONS	ACTION
1 TO: COMMANDING GENERAL MCB, CLNC	INITIALS / DATE	CIRCULATE / COORDINATION
2 ATTN: BASE MAINTENANCE OFFICER		FILE / INFORMATION
3		NOTE AND RETURN / PER CONVERSATION
4		SEE ME / SIGNATURE

REMARKS

For your information per instructions DPDR-MR 232-80 msg.

FROM	DATE
Mr. King - DPDO-2E Jane	8/4/80
	PHONE 5613

DD FORM 1 OCT 60 95 REPLACES DD FORM 94, 1 FEB 50 AND DD FORM 95, 1 FEB 50 WHICH WILL BE USED UNTIL EXHAUSTED.

0102-000-6500

ENCLOSURE (1)

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F | T/A: C | APPROVED | DATE RECEIVED (yr., mo., & day)

I. NAME OF INSTALLATION

DEFENSE PROPERTY DISP OFFICE LEJEUNE

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 BLDG 906

CITY OR TOWN: 4 CAMP LEJEUNE | ST.: NC | ZIP CODE: 28542

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 BLDG 906

CITY OR TOWN: 6 CAMP LEJEUNE | ST.: NC | ZIP CODE: 28542

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title): 2 KING MARVIN J PROP DISP OFF

PHONE NO. (area code & no.): 919-451-5613

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 DEPARTMENT OF DEFENSE

DETACH

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

F

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

S															T/A	C
W																1
1	2	-											13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001) [X] 2. CORROSIVE (D002) [X] 3. REACTIVE (D003) [X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	M. J. KING, PROPERTY DISPOSAL CHIEF	7/17/80

AGREEMENT BETWEEN MARINE CORPS BASE, CAMP LEJEUNE AND MARINE CORPS AIR STATION (H), NEW RIVER FOR IMPLEMENTATION OF HAZARDOUS MATERIAL ENVIRONMENTAL PROGRAM

MARINE CORPS BASE WILL:	MARINE CORPS AIR STATION (H) WILL:
1. Register Marine Corps Base with Environmental Protection Agency as a generator, long term storer, transporter and disposer of hazardous waste by 17 August 1980. Apply to EPA for permit to store hazardous waste by 19 November 1980.	Register with EPA as a generator and transporter of hazardous waste by 17 August 1980.
2. Provide long term storage (for periods of 90 days or longer) for hazardous wastes subject to Resource Conservation and Recovery Act (RCRA).	Provide interim storage (less than 90 days) for all hazardous wastes subject to RCRA regulations.
3. Accept for storage (awaiting disposal) all MCAS (H) hazardous wastes subject to RCRA regulations which DPDO refuses to accept for any reasons other than improper packaging, labeling and lack of information or identification of the waste components. Wastes will be accepted only upon the presentation of a DPDO document upon which DPDO clearly identified the reason for rejecting the wastes. Process analysis requirements for MCAS(H). Bear the associated costs.	Prepare DD Form 1348-1 for each hazardous material declared excess or to be a waste and attempt delivery to DPDO for disposal. Be responsible for proper labeling and packaging of hazardous materials and wastes and providing packaging materials. Sample wastes containing unknown contaminates and provide sample to MCB for processing.
4. Be responsible for effecting the disposal of all wastes accepted under paragraph 3 above and funding associated costs.	Provide transportation of hazardous wastes to DPDO and/or to Marine Corps Base storage facilities.
5. Provide guidance to MCAS(H) in EPA report preparation. Provide EPA with required information regarding storage and final disposal of MCAS(H) hazardous wastes received for permanent storage by Marine Corps Base.	Prepare EPA required reports for all transportation of hazardous materials meeting the definitions of hazardous waste to Marine Corps Base, DPDO or other EPA approved site for disposal.
6. Provide technical assistance in environmental protection and the safety aspects of program development for hazardous waste management plans and hazardous materials spill prevention, control and countermeasure plans.	Prepare, implement and enforce a hazardous waste management plan and a hazardous material spill prevention, control and countermeasure plan for MCAS(H).

ENCLOSURE (2)

MARINE CORPS BASE WILL:

7. Include MCAS(H) in a basewide hazardous materials spills contingency plan. Furnish on-scene coordinator to supervise cleanup. Furnish a basic level of personnel and equipment to handle routine spills. Make required reports to regulatory agencies and CMC. Bear the cost of spill cleanup.

8. Furnish MCB Representative to serve as technical advisor to MCAS(H).

(Signature) (Date)

Commanding General
Marine Corps Base
Camp Lejeune, North Carolina 28542

MARINE CORPS AIR STATION (H) WILL:

Make available additional manpower as requested by on-scene coordinator to effect timely cleanup. Provide timely investigation of spills and provide report of findings to MCB. The cost of spills determined to be due to negligence by MCAS(H) will be reimbursable to MCB.

Designate a point of contact to implement a hazardous material environmental management program.

(Signature) (Date)

Commanding Officer
Marine Corps Air Station (H), New River
Jacksonville, North Carolina 28540

THIS AGREEMENT WILL REMAIN IN EFFECT UNTIL INCORPORATED INTO THE MARINE CORPS AIR BASES EAST/ MARINE CORPS BASE, CAMP LEJEUNE LOGISTIC/SUPPORT SERVICES AGREEMENT FOR MARINE CORPS BASE CAMP LEJEUNE/MARINE CORPS AIR STATION (H), NEW RIVER..

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Camp Lejeune, North Carolina 28542

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Commanding Officer
Marine Corps Air Station (H), New River
Jacksonville, North Carolina 28540

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

4/3/80

From: Assistant Maintenance Officer
To: NKEA

Subj:

Julian,

I think we got all the records/ work orders we need on this at the time. File until we hear something further on this subject.

OK
DLW
3 Apr 80

Danny
Please note & File
DS

	ACTION	INFO	INITIAL
	APR 2 1980		
BMO			
ABMO		✓	
MAINT NCO			
SAFETY CHMN			
PROP			
M&R			
OPNS			
ADMIN		✓	S
TELE			
UTIL			
ENVIRON AFF	✓		
SECRETARY			
F&A BRANCH			
UMACS			

Beth,
Get me ref 2 & b
again,
BME

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

FAC:JCT:mkc
6280
1 Apr 1980

From: Commanding General

To: Base Maintenance Officer

Subj: Lubricating oil recycling and reuse

Ref: (a) BMaintO ltr MAIN/DDS/th 6240 of 11 Mar 1980
(b) MCO 4100.11

1. Reference (a) states that significant progress has been made toward accomplishing action on items 3b - 3f of reference (b). While this progress is commendable, further efforts are necessary to develop procedures to comply with paragraph 3g of reference (b).

2. Therefore, it is requested that reference (b) be reevaluated to initiate actions to ensure compliance with paragraph 3g. It appears that we may need to publish a Base Order on this subject.

K. P. Millice Jr.

K. P. MILLICE, Jr.
By direction

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

FAC:JCT:mkc
6280
1 Apr 1980

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K. P. MILLICE, Jr.
By direction

Fac

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

MCO 4100.11
LFF-2-aj
4 Oct 1979

MARINE CORPS ORDER 4100.11

From: Commandant of the Marine Corps
To: Distribution List

Subj: Lubricating Oil Recycling and Reuse Policy

Ref: (a) 43 Fed. Reg 58946-59027 (1978)
(b) DoD 4160.21-M, Defense Disposal Manual (NOTAL)

1. Purpose. To issue revised Department of Defense (DOD) policy regarding recovery, reclamation, and reuse of used lubricating oils.

2. Information

a. The Marine Corps and other DOD activities require an adequate supply of various types and grades of lubricating oils to operate industrial equipment, vehicles, and aircraft.

b. Lubricating oil base stocks have decreased to a critically low level because of the worldwide demand for, and scarcity of, petroleum fuels. The refining industry has indicated that the ability to reduce the demand for lubricating and industrial oils depends on supplementing virgin stocks with professionally refined used stocks.

c. The most energy conservative and environmentally acceptable disposal of used lubricating oils is re-refining and reuse. As an alternative, used lubricating oils have been burned in activity heating plants as a fuel or fuel supplement. The Environmental Protection Agency's (EPA's) current plans to classify used lubricating oil as a hazardous waste (see reference (a)) will significantly complicate the burning of used lubricating oil.

d. To promote the overall objective of utilizing used lubricating oil as an asset rather than as a waste product, the DOD has authorized that net proceeds from the sale of such oil may be used at the discretion of activity commanders for accomplishing special projects related to environmental improvement and/or energy conservation.

3. Action. Activity commanders shall:

a. Discontinue all current used lubricating oil disposal practices which are not environmentally acceptable, including weed control, insect control, road dust control, open pit burning, dumping into landfills, etc.

b. Maximize the recovery and collection of used lubricating oil to include:

(1) Identification of sources not being recovered and instituting new procedures to recover this additional oil, as required.

AC ROUTING

	ACTION	INFO	INT
FACO			
4A			
4B			
4C			
4E			

PCN 102 043008 00

(2) Encouraging voluntary participation of military/civilian employees, who change the crankcase oil in their personal vehicles, to deliver the recovered oil to a Marine Corps collection point. Cooperative programs with local business, civic, and governmental organizations might also be considered.

c. Utilize the services of the Defense Property Disposal Offices to accomplish the sale of recovered lubricating oil for the purpose of re-refining. (Reference (b) applies.)

d. Burn the used lubricating oil as a fuel in boilers, if no reasonable arrangements can be made for recovery by re-refining. In determining reasonableness, economics alone shall not be considered as sufficient justification for burning used lubricating oil; environmental effects and conservation shall also be considered.

e. Investigate ways to reduce the generation of used lubricating oil through good preventive maintenance, optimizing oil drain intervals, etc.

f. Accomplish locally desired special projects related to environmental improvement and/or energy conservation using net proceeds from the sale of used lubricating oils.

g. Keep accurate records for review by inspecting officials, regarding the following:

(1) Volume of used lubricating oil generated.

(2) Volume of used lubricating oil recovered for sale and volume recovered for burning.

(3) Revenue from sale.

(4) Expenditures to administer used lubricating oil recycling program.

(5) Net proceeds available for special environmental/energy projects.

4. Reserve Applicability. This Order is applicable to the Marine Corps Reserve.

H. A. Hatch

H. A. HATCH
Deputy Chief of Staff
for Installations and Logistics

DISTRIBUTION: A

Copy to: 7000144/8145001

T-file #628014

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

MAIN/DDS/th
6240

MAR 11 1980

From: Base Maintenance Officer
To: Assistant Chief of Staff, Facilities

Subj: Lubricating oil recycling and reuse

Ref: (a) MCO 4100.11
(b) BO 11090.1A
(c) Oil Spill Prevention Control and Countermeasure Plan

1. This letter is in reply to your request for comments on reference (a). Base has an active oil pollution abatement and oil recycling and conservation program. Basic instructions are contained in references (b) and (c) and have been implemented. As a result, approximately 130,000 gallons of petroleum products are being recovered annually. In January 1980, approximately 155,000 gallons were sold by Defense Property Disposal Office for approximately $30,000.

2. Base Comptroller has requested, as authorized by reference (a), that Defense Property Disposal Office return the proceeds of waste oil sales to base for use in environmental programs.

3. One of the primary uses the purchasers of this waste oil are making is as fuel. The waste oil contains contaminants such as paint thinners, transmission fluids, etc., which prevent re-refining for use as lubricants. In this regard, the Environmental Protection Agency's proposal to classify waste oil as hazardous waste may present a problem.

4. None of the oil disposal practices such as road dust control, etc. are authorized aboard base. Some waste oil is being burned for Base Fire Department and Marine Corps Air Station (H), New River crash crew training.

5. Significant progress has been made toward accomplishing action on items 3b-3f of reference (a). Examples are as follows:

a. Base Maintenance Department budgets two man years for waste oil recovery. Work involves routine pumping out of waste oil storage tanks and maintenance of oil/water separators.

b. Approximately 1/3 of the Supervisory Ecologist's time is spent on oil pollution abatement and oil conservation and recycling programs.

c. An additional billet was requested during a recent Natural Resources and Environmental Affairs TMR Review for the purpose of accelerating all oil pollution abatement and fuel conservation programs.

MAR 1 1 1980

6. To meet the spirit and intent of environmental regulations related to oil conservation and recycling programs requires significant input by the tenant commands. To date, this support has been inadequate. This is particularly true in regard to the incorporation of these rules and regulations into normal operating procedures of line forces involved in the handling and disposal of petroleum products.

T. R. BAISLEY

HEADQUARTERS, MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA

Date 31 Dec 80

From: Assistant Chief of Staff Facilities
To: Base Maintenance Officer

Subj: Support Agreemat w/COMCABEAST; changes to it pertains to HW.

1. Lets get the proposed changes to the Support Agreement together based on recent procedure changes and our discussions with MCAS(H) New River.

2. SJA says they will ~~not~~ now go along with what we want to do based on the 6 Nov 80 Ltr from HQMC.

K. P. Millsaps

MCBCL 5216/9

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

IN REPLY REFER TO

LFF-2:PCH:yum

6 NOV 1980

From: Commandant of the Marine Corps
To: Commanding General, Marine Corps Base,
Camp Lejeune NC 28586

Subj: Marine Corps Compliance with Hazardous Waste Regulations

Ref: (a) MCO P11000.8A
(b) COMCABEAST/MCB Camp Lejeune Logistic Support Service Agreement Revision No. 1 of March 1977
(c) 40 CFR Parts 260 to 265 and 122 to 124 of 19 May 1980
(d) MCBul 6280 of 1 Oct 1980

Encl: (1) Recommended Content for a Memorandum of Understanding Regarding Non-contiguous Activity Requirements for Compliance with Hazardous Waste Management Regulations

1. Reference (a) establishes policy and implements a program for protection of the environment within the Marine Corps. The Order recommends designation of single responsibility for the management of natural resources and environmental affairs for MCB Camp Lejeune and MCAS(H) New River. This was accomplished within a Logistic Support Service Agreement between the two facilities, most recently updated by reference (b). A national program to ensure proper handling and disposal of hazardous wastes was established by reference (c). The unique notification and reporting requirements associated with these regulations create ambiguity regarding the responsibilities of MCB Camp Lejeune and MCAS(H) New River as set forth in references (a) and (b). This letter provides guidance to ensure full compliance with the Resource Conservation and Recovery Act (RCRA) implementing regulations while maintaining the MCB Camp Lejeune service support role to the maximum extent practicable. It is recommended that the guidance provided herein be incorporated into the next update of reference (b).

2. The RCRA program provides a cradle-to-grave (generation to ultimate disposal) approach for the management of hazardous wastes. Administrative procedures associated with these regulations include certain notification, permitting and annual reporting requirements which must be met within specific time frames by generators, transporters, storers, processors, and disposers of hazardous wastes. Normally, these requirements would be the responsibility of MCB Camp Lejeune. The implementing regulations require, however, that activities physically separated by public access roads, who generate hazardous wastes in excess of the

LFF-2PCH:yum
6 NOV 1980

Subj: Marine Corps Compliance with Hazardous Waste Regulations

quantities established in the implementing regulations, file separately a "Notification of Hazardous Waste Activity" form and comply with other administrative requirements, regardless of the internal management system established for handling hazardous wastes.

3. Reference (a) directs Marine Corps activities to comply with the spirit as well as the letter of all Federal environmental laws. This policy is extended to State and local environmental requirements by reference (d). (RCRA provides for state impleme-tation of this program when consistency requirements are met). In order to comply with the RCRA implementing regulations, MCB Camp Lejeune and MCAS(H) New River will ensure that the admini-strative procedures required under these regulations are met. To accomplish this, it is suggested that a Memorandum of Under-standing (MOU) be established between the two Commands, delineating each activity's responsibilities for implementation of the hazardous waste management regulations. The recommended content of such a MOU, that minimizes the administrative requirements of MCAS(H) New River, is provided as the enclosure. It must be emphasized that while the designated single point of responsibility for environmental matters (i.e. MCB Camp Lejeune) can provide tech-nical and administrative assistance to non-contiguous facilities generating quantities of hazardous wastes in excess of that specified in the regulations, the RCRA regulations require that the ultimate responsibility for proper management of hazardous wastes still rests with the non-contiguous activity (i.e. MCAS(H) New River).

4. Clarification of the special circumstances created by these regulations will be included in the next update to reference (a). Questions regarding this matter should be directed to Mr. Paul Hubbell, the Headquarters Marine Corps point of contact for implementation of the hazardous materials environmental manage-ment program. Mr. Hubbell can be reached on Autovon 224-1425/ 2171.

Frank E. PETERSEN
By direction

Copy to:
COMCABEAST
MCAS(H) NEW RIVER

Recommended Content for a Memorandum of Understanding Regarding Non-contiguous Activity Requirements for Compliance with Hazardous Waste Management Regulations

MCB Camp Lejeune/MCAS(H) New River responsibilities in a support service agreement for compliance with RCRA implementing regulations should include the following:

MCB Camp Lejeune shall:

1. Designate an activity focal point regarding hazardous wastes.

done 2. Assist MCAS(H) New River in preparation of EPA "Notification of Hazardous Waste Activity" form.

3. Provide guidance/material support to ensure proper short term (less than ninety days) storage of generated hazardous wastes at MCAS(H) New River.

4. Accept MCAS(H) New River generated hazardous wastes that have been properly packaged and documented.

5. Complete storage/processing/and disposal actions for MCAS(H) New River generated hazardous wastes.

6. Maintain sufficient records regarding transport/storage/processing/and disposal of MCAS(H) New River generated hazardous wastes.

7. Provide guidance as required regarding preparation and submission of annual hazardous waste reports.

8. Provide technical assistance and environmental protection support to MCAS(H) New River regarding Spill Prevention Control and Countermeasures (SPCC) Plan and Hazardous Waste Management Plan development and implementation.

9. Include MCAS(H) New River in an area-wide Oil/Hazardous Material spill contingency plan.

MCAS(H) New River shall:

1. Designate an activity focal point regarding hazardous wastes.

done 2. Prepare and forward (with MCB Camp Lejeune support) the EPA "Notification of Hazardous Waste Activity" form.

3. Properly package and provide short term (less than ninety days) storage for hazardous wastes generated.

4. Deliver hazardous wastes, properly packaged and documented, to MCB Camp Lejeune ultimate disposal action.

Enclosure (1)

5. Provide required manifest documentation and maintain appropriate records of such shipments.

6. Prepare (with MCB Camp Lejeune assistance), sign, and forward annual hazardous waste management reports required by EPA.

7. Implement and enforce a Spill Prevention, Control, and Countermeasures Plan and the Hazardous Waste Management Plan.

8. Assist, as required, in implementing an area-wide Oil/ Hazardous Material spill contingency plan.

MAIN/TH/mp
6240
22 January 1981

From: Base Maintenance Officer
To: Base Motor Transport Officer

Subj: Air Transportation of Hazardous Waste

Encl: (1) COMNAVSUPSYSCOM Wash DC Msg 132103Z Jan 81

1. Enclosure (1) is provided for your information.

J. I. WOOTEN
By direction

FAC

ROUTINE ********** * U N C L A S S I F I E D * **********

PT 00371 013/2226Z

DISTRIBUTION DISTRIBUTION PAGE 01

FAC ROUTING

	ACTION	INFO	INT
CMD			
ASST			
XO			
CHAP			
READ			
Wagner D.			
Ober D.			
MAR D.			
4th D.			
3rd D.			
4th A. D.			
4th P. D.			
MWR			
Maintenance Officer			
Secretary			

Copy sent to BMO

RTTUZYUW RULSSGG6025 0132223-UUUU--RUEBDOA.
ZNR UUUUU
RUCLFCB T CG MCAS CHERRY PT NC
RUCLFVA T CG FOURTH MARDIV
RUEAHOF T COMNAVFACENGCOM ALEXANDRIA VA
RUERHHA T USNA ANNAPOLIS MD
RUHQHQA T CG FMFPAC
RULYLKA T COMCELANT NORFOLK VA
R 132103Z JAN 81
FM COMNAVSUPSYSCOM WASHINGTON DC
TO ALL CONUS NAVY SHIPPERS //INFO: CG MCB//
BT
UNCLAS //N04600//
SUBJ: AIR TRANSPORTATION OF HAZARDOUS MATERIAL SHIPMENTS
A. NAVSUP 102013Z DEC 80
1. REFERENCE A ADVISED OF FINES BEING LEVIED BY THE U.S. COAST GUARD AGAINST DOD PERSONNEL RESPONSIBLE FOR CERTIFICATION FOR SHIPMENT OF HAZARDOUS MATERIALS AND URGED COMPLIANCE WITH CFR 49 AND IMCO PUBLICATIONS, AS APPLICABLE.
2. THE FEDERAL AVIATION ADMINISTRATION (FAA) HAS RECENTLY NOTIFIED FORWARDERS, SHIPPERS, AND AIRLINES THAT THERE WILL BE MUCH STRICTER ENFORCEMENT IN THE FUTURE OF HAZARDOUS MATERIALS SHIPMENT REGULATIONS. THIS INCREASED EMPHASIS IS A RESULT OF A TRANSFER OF THE REGULATIONS FROM THE FLIGHT STANDARDS DIVISION TO THE SECURITY DIVISION WITHIN THE FAA. FAA SECURITY OFFICERS WILL ENFORCE THE REGULATIONS AT MAJOR AIRPORTS CONCENTRATING ON CARRIERS MOST HEAVILY INVOLVED IN SHIPMENT OF FREIGHT VICE PASSENGERS. IN ADDITION, FAA WILL PROPOSE REGULATIONS TO POLICE AIR FREIGHT FORWARDERS NOT PRE-

PAGE 02 RULSSGG6025 UNCLAS
SENTLY COVERED BY TRAINING AND REPORTING REQUIREMENTS, PROPOSE REGULATIONS COVERING FOREIGN CARRIERS TRANSPORTING HAZARDOUS MATERIALS TO THE U.S., AND WILL DIRECT MORE ATTENTION TO THOSE CARRIERS GRANTED EXEMPTIONS TO THE REGULATIONS, INSPECTING THEM AT LEAST QUARTERLY. FAA ALSO PLANS TO CONDUCT INSPECTIONS OF SHIPPERS.
3. EFFECTIVE 1 JANUARY 1981, AIRLINES ARE REQUIRED TO POST SIGNS WARNING PASSENGERS OF HAZARDOUS MATERIALS THEY CANNOT CARRY ABOARD AIRCRAFT AND INFORMING PASSENGERS OF PENALTIES. CRIMINAL VIOLATIONS WILL BE SOUGHT WHEN WARRANTED AND CIVIL PENALTIES WILL ALSO BE PURSUED.
4. NAVY SHIPPERS MUST ENSURE STRICT COMPLIANCE WITH FAA HAZARDOUS MATERIAL SHIPMENT REGULATIONS. TITLE 49 CFR APPLIES.
BT
#6025

NNNN

INFO: LCG, TRNG, SPTDIV, FSMO-1, PERS, PO, ADJ, MANP, ECD, DSSC, MCES, FAC, RRDET, TMO/35

ROUTINE ********** * U N C L A S S I F I E D * **********

1321032 Jan 81

13 21 03Z JAN

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

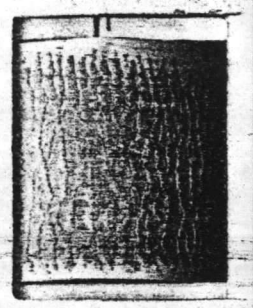
22 January 1981

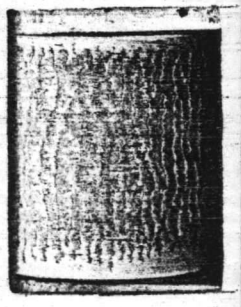
From: Assistant Base Maintenance Officer
To: Assistant Chief of Staff, Logistics
(ATTN: MAJ Newman)
Subj: Hazardous Waste Handlers Training Course

1. Attached memo forwarded for your information. Will provide further info when and if received.

B. W. ELSTON

Enclosure





ROUTING SLIP

JAN 0 2 1980

	ACTION	INFO	INITIAL
BMO		✓	
ABMO		✓	Burr
ADMIN		✓	S
ENVIRON AFF	✓		
F&A BRANCH			
MAINT NCO			
M&R			
OPNS			
PROP			
TELE			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

Billy,
This looks like a course for TMO personnel rather than us. Why Danny?

M.

Billy
Plz. check.
Did Danny volunteer
Camp Lejeune to sponsor
this?

M

Julia
What about this?
BMR

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 31 Dec 80

TO:

[BASE MAINT O]
PUBLIC WORKS O
COMM-ELECT O
MOTOR TRANSPORT O

DIR, QUARTERS & HOUSING
DIR, BOQ/BSQ
BASE FIRE CHIEF

ATTN: _____

(1.) Attached is forwarded for info/~~action~~.

My telcon with LantDiv, NAVFAC this date indicated coordination had been made with Ms. Sharp (NREA) and CPO Trug re this Trug crs.

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

(3.) Your file copy

Respy,
S.C. Pierce

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

MCBCL 5216/21

~~F. BRAD~~

F. M. Sharpe

TO

~~Mr.~~ Director

Subject: Proposed Hazardous waste training
Ref (A) LANTDIV LTR. 1141:PAR 6280 of 19 Dec 1980.

1. The subject training was discussed in a joint conversation between Paul Rakowski, LantDiv code 1141; and Mr. Julian Wooten and D. Sharpe B MAM Dept. Mr. Rakowsky was advised that any such training should be coordinated with CPO, and that NREAD could not Commit Base to this type of undertaking. Mr. Rakowski was provided telephone numbers of Training Division, CPO. Ref (a) is the first information we have had since original conversation.

2 I call

Call Rokawski

(٥)

II-R-8

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

TELEPHONE NO.
444-4923
AUTOVON 444-4923
IN REPLY REFER TO:
114:PAR
6280

19 DEC 1980

From: Commander, Atlantic Division, Naval Facilities Engineering Command
To: Commander, Naval Facilities Engineering Command

Subj: Hazardous Waste (HW) Handlers Training Course

Ref: (a) COMNAVFACENGCOM ltr 1122C/JAY of 20 Oct 1980 (NOTAL)

1. As requested by reference (a), Navy activities nominated to sponsor subject training course are as follows:

a. Marine Corps Base, Camp Lejeune, North Carolina. Preferred months are March and November with least desirable months being January, September and October. Require at least two months lead time for coordination.

b. Naval Weapons Station, Yorktown, Virginia. Preferred months are June, July and August with least desirable months being December, January and February. Require at least two months lead time for coordination.

c. Norfolk Naval Shipyard, Portsmouth, Virginia. Winter months should be avoided. Require at least two months lead time for coordination.

2. Based upon informal comments received from attendees at the 29 September through 3 October 1980 workshop, significant modifications to the course content are warranted. The degree and depth of technical information previously presented to attendees must be redirected to fit their educational background. Attendees are hands-on HW handlers requiring information necessary to do their job efficiently and safely. Lengthy discussions of regulation interpretations, detailed Navy policy, and complex chemistry and chemical reactions are not warranted. Point of contact for the Atlantic Division, Naval Facilities Engineering Command HW Training Program is Mr. Wallace Carter, AUTOVON 690-4903 or (804) 444-4903.

J. R. Bailey
J. R. BAILEY
By direction

Copy to:
MCB CAMP LEJEUNE
NAVWPNSTA YORKTOWN
NORFOLKNAVSHIPYD
PWC NORFOLK
NPWTC

Burley Mitchell
O.W. Strickland
Dr. Ralph Ely

94-580

4 copies

Agenda for

ONSLOW COUNTY REGIONAL PUBLIC MEETINGS

Southwest Junior/Senior High School

MANAGING HAZARDOUS AND LOW-LEVEL RADIOACTIVE WASTE IN NORTH CAROLINA

Governor's Task Force on Waste Management

1,69 mailing tubes

January 22, 1981

7:00 p.m.

Objectives

1. To provide opportunity for full public discussions of proposed recommendations of the Governor's Task Force on Waste Management.

2. To identiy public responses to the proposed recommendations, to be included in the Task Force report to the Governor.

3. To receive additional public comments on managing hazardous and low-level radioactive wastes.

Agenda

7:00	Welcome and Introductions	Ormond Barbee, Chairman Onslow County Board of Commissioners
7:05	Orientation . Background of Task Force . Importance of Public Meetings . Agenda	~~Senator Russell Walker~~ Burley Mitchell Meeting Moderator
7:15 - 7:35	Waste Management Problem in North Carolina . Slide Show . Hazardous Waste Problem . Low-Level Radioactive Problem	N. C. School of Science & Mathematics O. W. Strickland, Head of Solid & Hazardous Waste Management Branch, Department of Human Resources Dr. Ralph L. Ely, Jr., director of the Office of University Relations, Research Triangle Institute
7:35 - 7:45	Recommendations of Governor's Task Force . Brief Overview	Burley Mitchell, Secretary Department of Crime Control and Public Safety
7:45 - 9:15	Small Group Discussions . Instructions . Group Meetings - Led by local facilitators	
9:15 - 10:00	Wrap Up . Group presentations - Group recorders . Clarifications - Group members . Task Force response - Senator Russell Walker	

CONTINUED ON BACK

10:00 Forum

. Additional opportunity for interested individuals and representatives of citizen groups to present statements or written comments.

Local Facilitators

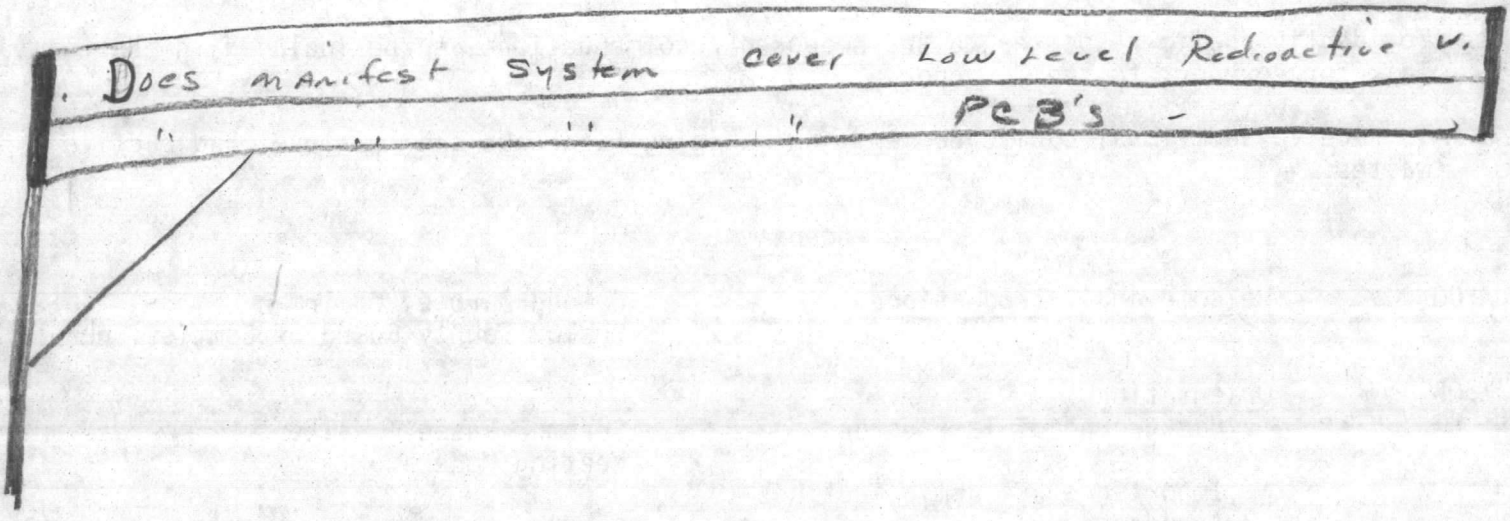
Herschel Brown
Jane Morse
Bob Quinn
Leo Shepherd
Lester May

Staff Director

Lucy Bode (919) 733-4534

Press Contact

Bryant Haskins (919) 733-4471



File: Mod grid W Hog

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

10/20/80

From: Assistant Base Maintenance Officer
To: NREA

Subj:

Julian,

Set up meeting with King sometime this week & let talk. BMO wants to talk about HW/SM, before we send this.

BVR

Attached letter returned by BMO

Julian

ROUTING SLIP SEP 1 6 1980

	ACTION	INFO	INITIAL
BMO			
ABMO		✓	H-S
ADMIN		✓	
ENVIRON AFF	✓		
F&A BRANCH			
MAINT NCO			
M&R			
OPNS			
PROP			
TELE			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

Danny,

Does Sinclair include tenant upkeep on ~~Station~~ right?

Julian

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 15 Sep 88

TO:

[BASE MAINT O]
PUBLIC WORKS O
COMM-ELECT O
MOTOR TRANSPORT O

DIR, QUARTERS & HOUSING
DIR, BOQ/BSQ
BASE FIRE CHIEF

ATTN: _____

1. Attached is forwarded for ~~info~~/action.

Please advise impact. Did we include them? Does this affect MCAS (H) New River?

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

3. Your file copy

K. P. Millis J

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

PRIORITY

****
* U N C L A S S I F I E D *
****
PT 00340 256/1932Z

PRIORITY PAGE 01

PTTUZYUW RUEACMC6336 2561928-UUUU--RUEBDOA.
ZNR UUUUU
P R 121506Z SEP 80
FM CMC WASHINGTON DC
TO AIG EIGHT //ACT: CG MCB//
INFO RUENAAA/CNO WASHINGTON DC
RULSNDA/COMNAVFACENGCOM WASHINGTON DC
RUEBUAB/HQ DPDS BATTLE CREEK MI
RUWDPAA/NAVENENVSUPPO PORT HUENEME CA
BT
UNCLAS //N06280//
CNO PASS TO OP45. COMNAVFACENGCOM PASS TO 1122
SUBJ: MCBUL 6280. RESOURCE CONSERVATION AND RECOVERY ACT NOTIFICATION TO EPA
(CMC CODE LFF-2)
A. MCBUL 6280 OF 1 MAY 1980
1. QUESTIONS HAVE BEEN RAISED WHETHER MARINE CORPS ACTIVITIES SHOULD HAVE INCLUDED HAZARDOUS WASTE OPERATIONS OF ALL TENANT ACTIVITIES IN THE "NOTIFICATION OF HAZARDOUS WASTE ACTIVITY" PACKAGE REQD BY ENVIRONMENTAL PROTECTION AGENCY (EPA) ON 18 AUG 1980 AND SUBMITTED IAW THE REF. DOD RESOLVED THIS MATTER BY POLICY MEMO OF 14 AUG 1980. TENANT ACTIVITIES, INCLUDING TENANTDEFENSE PROPERTY

PAGE 02 RUEACMC6336 UNCLAS
DISPOSAL OPERATIONS, WERE TO BE PART OF ACTIVITY NOTIFICATION.
2. IF NOTIFICATION TO EPA DID NOT INCLUDE ALL TENANT OPERATIONS, SUCH NOTIFICATION SHALL BE AMENDED IMMEDIATELY BY SUBMITTING A REVISED "NOTIFICATION OF HAZARDOUS WASTE ACTIVITY" FORM WITH BLOCK VIII B (SUBSEQUENT NOTIFICATION) CHECKED. ANY SUBSEQUENT NOTIFICATION SHALL BE SUBMITTED VIA THE COGNIZANT NAVFACENGCOM EFD.
3. THIS BULLETIN IS APPLICABLE TO THE MCR.
4. THIS BULLETIN CANCELED 31 DEC 1980.
BT
#6336

NNNN

ACT:FAC /34
INFO:TRNG,CSC, ADJ
NRMC

ORIGINAL
ACTION

PRIORITY

****
* U N C L A S S I F I E D *
****

121506Z Sep 80

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

IN REPLY REFER TO
MAIN/DDS/th
6240

From: Commanding General
To: Defense Property Disposal Officer (DPDO)

Subj: Resource Conservation and Recovery Act (RCRA); requirements of

Encl: (1) CMC msg 121506Z Sep 80

1. The subject requirements are applicable to the generation, storage, transportation and disposal of hazardous waste by base and all base tenants. Enclosure (1) assigns responsibility for DPDO hazardous waste activity to this command in regard to the subject requirements. In that DPDO, Camp Lejeune, did not register with the Environmental Protection Agency (EPA) as a generator, transporter or storer (over 90 days) of hazardous waste, all hazardous waste activities aboard base by DPDO will have to be carried out under the base EPA hazardous waste activity number.

2. This letter is to advise that prior written concurrence of this command must be obtained for the storage of hazardous waste aboard Marine Corps Base, Camp Lejeune, except as provided in paragraph 3 below. Also, the hazardous waste activity identification number assigned to base by the EPA may not be used during any transaction involving the disposal of hazardous waste without the express written concurrence of this command.

3. The wastes generated aboard base and Marine Corps Air Station (Helicopter), New River by Marine Corps Base, Camp Lejeune, Marine Corps Air Station (Helicopter), New River and tenants thereof; 2d Marine Division, 2d Force Service Support Group, Naval Regional Medical Center, and Naval Regional Dental Center may be stored aboard base, but not more than 90 days from the date wastes were generated without the concurrence of this command.

4. For assistance, please contact Mr. Danny Sharpe, Base Maintenance Department, extension 5003.

PRIORITY

****
* U N C L A S S I F I E D *
****
PT 00340 256/1932Z

PRIORITY PAGE 01

PTTUZYUW RUEACMC6336 2561928-UUUU--RUEBDOA.
ZNR UUUUU
P R 121506Z SEP 80
FM CMC WASHINGTON DC
TO AIG EIGHT //ACT: CC MCB//
INFO RUENAAA/CNO WASHINGTON DC
RULSNDA/COMNAVFACENGCOM WASHINGTON DC
RUEBUAB/HQ DPDS BATTLE CREEK MI
RUWDPAA/NAVENENVSUPPO PORT HUENEME CA
BT
UNCLAS //N06280//
CNO PASS TO OP45, COMNAVFACENGCOM PASS TO 1122
SUBJ: MCBUL 6280. RESOURCE CONSERVATION AND RECOVERY ACT NOTIFICATION TO EPA
(CMC CODE LFF-2)
A. MCBUL 6280 OF 1 MAY 1980
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PAGE 02 RUEACMC6336 UNCLAS
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3. THIS BULLETIN IS APPLICABLE TO THE MCR.
4. THIS BULLETIN CANCELED 31 DEC 1980.
BT
#6336

NNNN

ACT:FAC /34
INFO:TRNG, CMC, ADJ
NRMC

ORIGINAL

ACTION

****
* U N C L A S S I F I E D *
****
PRIORITY

121506Z Sep 80

ENCLOSURE (1)

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

IN REPLY REFER TO
MAIN/DDS/th
6240

From: Commanding General
To: Defense Property Disposal Officer (DPDO)

Subj: Resource Conservation and Recovery Act (RCRA); requirements of

Encl: (1) CMC msg 121506Z Sep 80

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4. For assistance, please contact Mr. Danny Sharpe, Base Maintenance Department, extension 5003.

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

8 Sept. 80

From: Director, NREA Division
To: Danny
Subj:

1. This might be good

File

HZ Waste

DS

MAW DDS

TOD 100318Z JUL 80

DISTRIBUTION

	BMO
	ABMO
	NREAD
3	Admin D.
	Oper D.
	M&R D.
	Tele D.
	Util D.
	F&A O.
	Prop O.
	MME
	Maint NCO
	Secretary

RTTUZYUW RUEBDOA7876 1900845-UUUU--RUEBDOB RUEBDOD RUEBNMA.
ZNR UUUUU
R 091814Z JUL 80
FM CG MCB CAMP LEJEUNE NC
TO ZEN/MCB CAMP LEJEUNE NC
INFO RUEBDOD/CG SECOND MARDIV
RUEBDOB/CG SECOND FSSG
RUEBNMA/MCAS H NEW RIVER NC
BT
UNCLAS //N05050//
FM SUPS/JEH FOR SUPO/UPO
SUBJ: SUPO CONFERENCE
1. A SUPPLY OFFICERS CONFERENCE IS BEING PLANNED AT MCB, CLNC, BEGINNING IN AUG 80 AND QUARTERLY THEREAFTER TO DISCUSS SUPPLY PROBLEM AREAS AND RELATED MATTERS AFFECTING BASE SUPPORTED/ SUPPORTING UNITS.
2. UPON DETERMINATION OF THE NUMBER OF ATTENDEES, THE TIME, DATE AND PLACE WILL BE ANNOUNCED.
3. IT IS REQUESTED THAT ATTENDEES PROVIDE AGENDA TOPICS FOR DISCUSSION AT THE CONFERENCE TO THE AC/S, SUPPLY SERVICES, NLT 30 JUL 80. NEGATIVE RESPONSE REQUIRED.
4. SUPPLY OFFICERS OF UNITS OF SECOND MARINE DIVISION, SECOND FSSG AND MCAS(H) ARE INVITED TO ATTEND.
BT
#7876

TOD: 100318Z JUL 80/35
REL: S C PARKER, GS-12, SUPS
ACT: TRNG, SUPS
INFO: MANP, FAC, PROT, JPAO, ITS, , HQBN, SPTBN, MCSSS, MCES, FMSS, RSU, RRDET, GEN & SPEC STAFF, ORG CMDRS

NNNN

091814Z Jan 80

To

OFFICIAL

Files

Per JIW

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

Date:

From: Base Maintenance Officer
To: Natural Resources

Subj:

Julian,

I think you have received memo for the record I sent to ACofS Fac in lieu of letter to CMC.

Talking to Paul Hubbel answered these questions in my opinion Col Mathis agrees.

Thanks

Mac

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

16 Oct 80

From: Director, NREA Division
To: Twylah
Subj: attached

1. Make copy for Danny

Julia

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

15 October 1980

MEMORANDUM FOR THE RECORD

Subj: Hazardous Materials/Wastes

1. FONECON with Mr. Paul Hubbell (Code LFF-2) this date provided the following information.

a. As of the moment, activity commanders are ultimately responsible for disposal to final disposition site since only activity commanders will be registered under RCRA. The only firm responsibility DPDO has is to try to sell, distribute to another federal agency or provide other disposition instructions.

b. Depending on the capabilities of each local DPDO, they might be able to:

(1) Assume accountability only.
(2) Assume accountability and custody.
(3) Arrange transport to final site.

However activity commander is still overall responsible.

c. Future possible realignment of responsibilities are still being studied at DOD level. One item currently being negotiated is a proposal that hazardous materials only be declared waste after DPDO has determined that no other user requires the material or resale is not possible.

d. Mr. Hubbel, at the request of this Command, is going to provide a recommendation/guidance on the relationship between CG, MCB and CO, MCAS(H) as it pertains to hazardous materials/wastes.

F. H. MOUNT

Copy to:
AC/S Facilities

Blind copy to:
NREA

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

IN REPLY REFER TO
MAIN/JIW/th
6240

From: Commanding General
To: Commandant of the Marine Corps (Code LFF-2)

Subj: Hazardous Materials Environmental Management Program; requirements of

Ref: (a) Resource Conservation and Recovery Act (RCRA)
(b) MCBul 6280 of 1 May 1980
(c) Marine Corps Air Bases East/Marine Corps Base, Camp Lejeune, Logistic/Support Services Agreement for MCBCLNC/MCAS(H)NR
(d) MCO P11000.8A

Encl: (1) DPDO memo of 8 Aug 1980 w/attachments
(2) Draft of Proposed Agreement btwn CG MCBCL & CO MCAS(H)NR

1. This letter is to request clarification and guidance on implementation of references (a) and (b).

2. Enclosure (1) has been interpreted by this Command as requiring the Commanding General, Marine Corps Base, to be responsible for all hazardous waste activity by the Defense Property Disposal Office after 19 November 1980. Marine Corps Base has been developing the subject program based on the premise that at some point in time Defense Property Disposal Office would furnish substantial manpower and funds for hazardous waste storage and disposal, as a result of new responsibilities assigned to the Defense Logistics Agency. This Command is not aware of any proposals for Defense Property Disposal Office to register with the Environmental Protection Agency as a generator, storer or transporter of hazardous waste. The current arrangement appears to be counterproductive and does not provide installation Commanders adequate authority to control hazardous wastes in the custody of Defense Property Disposal Office.

3. Enclosure (2) outlines a proposed interim agreement between Marine Corps Air Station (Helicopter), New River and this Command to guide implementation of the subject program for Marine Corps Air Station (Helicopter), New River. This agreement is proposed to end upon incorporation of its contents into reference (c). Of particular concern is whether or not the responsibilities outlined in enclosure (2) are consistent with the intent of references (c) and (d). This Command's position is that reference (c) does not provide a basis for implementation of references (a) and (b).

MEMO ROUTING SLIP	NEVER USE FOR APPROVALS, DISAPPROVALS, CONCURRENCES, OR SIMILAR ACTIONS	ACTION
1 TO COMMANDING GENERAL MCB, CLB/C	INITIALS / DATE	CIRCULATE / COORDINATION
2 ATTN: BASE MAINTENANCE OFFICER		FILE / INFORMATION
3		NOTE AND RETURN / PER CONVERSATION
4		SEE ME / SIGNATURE

REMARKS

For your information per reference DPDR-MR 232-80 msg.

FROM	DATE
Mr. King - DPDO-LeJeune	8/8/80
	PHONE 5613

DD FORM 1 OCT 60 95 0102-000-6500

REPLACES DD FORM 94, 1 FEB 50 AND DD FORM 95, 1 FEB 50 WHICH WILL BE USED UNTIL EXHAUSTED.

ENCLOSURE (1)

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F | T/A: | C: 1 | APPROVED | DATE RECEIVED (yr., mo., & day)

I. NAME OF INSTALLATION

DEFENSE PROPERTY DISP OFFICE LEJEUNE

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 BLDG 906

CITY OR TOWN: 4 CAMP LEJEUNE | ST.: NC | ZIP CODE: 28542

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 BLDG 906

CITY OR TOWN: 6 CAMP LEJEUNE | ST.: NC | ZIP CODE: 28542

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 KING MARVIN J PROP DISP OFF

PHONE NO. *(area code & no.)*: 919-451-5613

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 DEPARTMENT OF DEFENSE

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

F

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

S															T/A	C
W																1
1	2												13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001) [X] 2. CORROSIVE (D002) [X] 3. REACTIVE (D003) [X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	M. J. KING, PROPERTY DISPOSAL CHIEF	7/17/80

AGREEMENT BETWEEN MARINE CORPS BASE, CAMP LEJEUNE AND MARINE CORPS AIR STATION (H), NEW RIVER FOR IMPLEMENTATION OF HAZARDOUS MATERIAL ENVIRONMENTAL PROGRAM

MARINE CORPS BASE WILL:	MARINE CORPS AIR STATION (H) WILL:
1. Register Marine Corps Base with Environmental Protection Agency as a generator, long term storer, transporter and disposer of hazardous waste by 17 August 1980. Apply to EPA for permit to store hazardous waste by 19 November 1980.	Register with EPA as a generator and transporter of hazardous waste by 17 August 1980.
2. Provide long term storage (for periods of 90 days or longer) for hazardous wastes subject to Resource Conservation and Recovery Act (RCRA).	Provide interim storage (less than 90 days) for all hazardous wastes subject to RCRA regulations.
3. Accept for storage (awaiting disposal) all MCAS (H) hazardous wastes subject to RCRA regulations which DPDO refuses to accept for any reasons other than improper packaging, labeling and lack of information or identification of the waste components. Wastes will be accepted only upon the presentation of a DPDO document upon which DPDO clearly identified the reason for rejecting the wastes. Process analysis requirements for MCAS(H). Bear the associated costs.	Prepare DD Form 1348-1 for each hazardous material declared excess or to be a waste and attempt delivery to DPDO for disposal. Be responsible for proper labeling and packaging of hazardous materials and wastes and providing packaging materials. Sample wastes containing unknown contaminates and provide sample to MCB for processing.
4. Be responsible for effecting the disposal of all wastes accepted under paragraph 3 above and funding associated costs.	Provide transportation of hazardous wastes to DPDO and/or to Marine Corps Base storage facilities.
5. Provide guidance to MCAS(H) in EPA report preparation. Provide EPA with required information regarding storage and final disposal of MCAS(H) hazardous wastes received for permanent storage by Marine Corps Base.	Prepare EPA required reports for all transportation of hazardous materials meeting the definitions of hazardous waste to Marine Corps Base, DPDO or other EPA approved site for disposal.
6. Provide technical assistance in environmental protection and the safety aspects of program development for hazardous waste management plans and hazardous materials spill prevention, control and countermeasure plans.	Prepare, implement and enforce a hazardous waste management plan and a hazardous material spill prevention, control and countermeasure plan for MCAS(H).

ENCLOSURE (2)

MARINE CORPS BASE WILL:

7. Include MCAS(H) in a basewide hazardous materials spills contingency plan. Furnish on-scene coordinator to supervise cleanup. Furnish a basic level of personnel and equipment to handle routine spills. Make required reports to regulatory agencies and CMC. Bear the cost of spill cleanup.

8. Furnish MCB Representative to serve as technical advisor to MCAS(H).

(Signature) (Date)

Commanding General
Marine Corps Base
Camp Lejeune, North Carolina 28542

MARINE CORPS AIR STATION (H) WILL:

Make available additional manpower as requested by on-scene coordinator to effect timely cleanup. Provide timely investigation of spills and provide report of findings to MCB. The cost of spills determined to be due to negligence by MCAS(H) will be reimbursable to MCB.

Designate a point of contact to implement a hazardous material environmental management program.

(Signature) (Date)

Commanding Officer
Marine Corps Air Station (H), New River
Jacksonville, North Carolina 28540

THIS AGREEMENT WILL REMAIN IN EFFECT UNTIL INCORPORATED INTO THE MARINE CORPS AIR BASES EAST/ MARINE CORPS BASE, CAMP LEJEUNE LOGISTIC/SUPPORT SERVICES AGREEMENT FOR MARINE CORPS BASE CAMP LEJEUNE/MARINE CORPS AIR STATION (H), NEW RIVER..

ENCLOSURE (2)

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

IN REPLY REFER TO

MAIN/JIW/th
6240

From: Commanding General
To: Commandant of the Marine Corps (Code LFF-2)

Subj: Hazardous Materials Environmental Management Program; requirements of

Ref: (a) Resource Conservation and Recovery Act (RCRA)
(b) MCBul 6280 of 1 May 1980
(c) Marine Corps Air Bases East/Marine Corps Base, Camp Lejeune, Logistic/Support Services Agreement for MCBCLNC/MCAS(H)NR
(d) MCO P11000.8A

Encl: (1) DPDO memo of 8 Aug 1980 w/attachments
(2) Draft of Proposed Agreement btwn CG MCBCL & CO MCAS(H)NR

1. This letter is to request clarification and guidance on implementation of references (a) and (b).

2. Enclosure (1) has been interpreted by this Command as requiring the Commanding General, Marine Corps Base, to be responsible for all hazardous waste activity by the Defense Property Disposal Office after 19 November 1980. Marine Corps Base has been developing the subject program based on the premise that at some point in time Defense Property Disposal Office would furnish substantial manpower and funds for hazardous waste storage and disposal, as a result of new responsibilities assigned to the Defense Logistics Agency. This Command is not aware of any proposals for Defense Property Disposal Office to register with the Environmental Protection Agency as a generator, storer or transporter of hazardous waste. The current arrangement appears to be counterproductive and does not provide installation Commanders adequate authority to control hazardous wastes in the custody of Defense Property Disposal Office.

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STAFFING LADDER
MCBCL 5216 (REV1-74)

MAIN/JIW/th
6240

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INSP	
	CG
	ABC
	C/S
	INSP
	PMO
	SJA
	AC of S Manpower
	AC of S PersServ
	AC of S Training
	AC of S SupServ
	AC of S Facilities
	AC of S Compt
	AC of S MngmntServ
	ADJ
	MAIN

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 11 Sep 1980

TO:

[BASE MAINT O]
PUBLIC WORKS O
COMM-ELECT O
MOTOR TRANSPORT O

DIR, QUARTERS & HOUSING
DIR, BOQ/BSQ
BASE FIRE CHIEF

ATTN: _____

1. (3) Attached is forwarded for info/action.

Concur. Please prepare recommended correspondence to CMC.

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

3. Your file copy

K. P. Mulvey

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

ROUTING SLIP

SEP 1 5 1980

	ACTION	INFO	INITIAL
BMO			
ABMO		✓	BWR
ADMIN		✓	S
ENVIRON AFF	✓		
F&A BRANCH			
MAINT NCO			
M&R			
OPNS			
PROP			
TELE			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

Danny
Please prepare response.
Julian

6280

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

MAIN/DDS/th
6240

SEP 0 9 1980

From: Base Maintenance Officer
To: Assistant Chief of Staff, Facilities

Subj: Hazardous Materials Management Program; requirements of

Ref: (a) Resource Conservation and Recovery Act (RCRA)
(b) MCBul 6280 of 1 May 1980

Encl: (1) DPDO memo of 8 Aug 1980 w/attachments
(2) CMC Washington DC 141512Z June 1980
(3) CMC Washington DC 151515Z June 1980

1. This memorandum outlines the significance of recent DOD decisions regarding the implementation of references (a) and (b). Deputy Assistant Secretary of Defense Marienthal determined that installation commanders would be the responsible official regarding compliance with RCRA notification procedures for DPDO hazardous waste activities. This determination outlined in enclosure (1) may impact adversely on the subject program being developed to implement references (a) and (b) at Camp Lejeune. Enclosures (2) and (3) indicate that the Defense Logistic Agency (DLA) has been assigned primary responsibility for hazardous material disposal with certain excepted categories of hazardous wastes. By not registering DPDO with EPA as a generator, transporter, or storer of hazardous waste, DPDO activities in these areas will have to be carried out under the authority of the Commanding General, Marine Corps Base, in order to comply with reference (a). Consequently, Marine Corps Base will retain legal responsibility for all hazardous waste activity up to the point that wastes are delivered to an EPA approved disposal/storage site.

2. The base program currently being developed anticipated a 12-24 months transition period before the local DPDO could develop the facilities and manpower to assume responsibility for hazardous waste storage and disposal. Consequently, this apparent conflict should not cause any significant problem for the short run. However, previous assumptions that DLA would at some point in time take a leading role in the subject program, thereby relieving base from much of the manpower and disposal costs of the subject program, is now in question. It is therefore recommended that appropriate contact be made with HQMC to request clarification of this issue and guidance regarding manpower and funding for this program. It is also recommended that HQMC be informed of the advantage to base of DPDO/DLA being the lead agency operating independently of base.

B W Elston

B. W. ELSTON
Acting Base Maintenance Officer

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3		NOTE AND RETURN / PER CONVERSATION
4		SEE ME / SIGNATURE

REMARKS

For your information per instruction DPDR-MR 232-80 MSG.

FROM: Mr. King - DPDO-2E Zone

DATE: 8/8/80

PHONE: 5613

DD FORM 1 OCT 60 95
0102-000-6500

REPLACES DD FORM 94, 1 FEB 50 AND DD FORM 95, 1 FEB 50 WHICH WILL BE USED UNTIL EXHAUSTED.

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DETACH

FOR OFFICIAL USE ONLY

COMMENTS

C

INSTALLATION'S EPA I.D. NUMBER | APPROVED | DATE RECEIVED (yr., mo., & day)

F | T/A: C | 1

I. NAME OF INSTALLATION

DEFENSE PROPERTY DISP OFFICE LEJEUNE

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 BLDG 906

CITY OR TOWN | ST. | ZIP CODE

4 CAMP LEJEUNE | NC | 28542

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 BLDG 906

CITY OR TOWN | ST. | ZIP CODE

6 CAMP LEJEUNE | NC | 28542

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)* | PHONE NO. *(area code & no.)*

2 KING MARVIN J PROP DISP OFF | 919-451-5613

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 DEPARTMENT OF DEFENSE

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

F

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1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001) [X] 2. CORROSIVE (D002) [X] 3. REACTIVE (D003) [X] 4. TOXIC (D000)

DETACH

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	M. J. KING, PROPERTY DISPOSAL CHIEF	7/17/80

DETACH

CZCREA390
RTTUZYUW RUCLFTA5683 2182012-UUUU--RUCLBRA. AUG 5 20 29:80
ZNR UUUUU
R 052005Z AUG 80
FM DPDR COMDR MEMPHIS TN
TO AIG 4544 //ACT: DPDO//
BT
UNCLAS DPDR-MR 232-80 PASS TO DEFENSE PROPERTY DISPOSAL OFFICES
SUBJECT: COMPLIANCE WITH RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) NOTIFICATION REQUIREMENTS
1. REFERENCE DPDR-MR LETTER 9 JUL 80, SUBJECT: RESOURCE CONSERVATION AND RECOVERY ACT OF 1976.
2. AT THE MONTHLY ENVIRONMENTAL QUALITY MEETING HELD BY THE DEPUTY ASSISTANT SECRETARY OF DEFENSE (EE&S) O 8 JULY 80, DPDS WAS INFORMED OF A DECISION MADE BY MR. MARIENTHAL THAT THE INSTALLATION COMMANDER IS THE RESPONSIBLE OFFICIAL REGARDING COMPLIACE WITH RCRA NOTIFICATION PROCEDURES. THEREFORE, ALL TENANT (DPDO'S) ACTIVITIES SHOULD REPORT THEIR POTENTIAL GENERATIONS OF HAZARDOUS WASTE TO THE HOST INSTALLATION COMMANDER FOR INCLUSION ON THE HOST NOTIFICATION FORM.
3. IN VIEW OF THE ABOVE, TAKE IMMEDIATE ACTION TO REPORT YOUR POTENTIAL HAZARDOUS WASTE GENERATIONS

PAGE 2 RUCLFTA5683 UNCLAS
TO THE INSTALLATION COMMANDER. YOU MAY WISH TO CONSIDER USING THE SAME NOTIFICATION PACKET YOU ORIGINALLY PREPARED AND FORWARD TO DPDS-LPE AS A VEHICLE FOR INFORMING THE HOST INSTALLATION.
4. IT IS OUR UNDERSTANDING THAT A PROPOSED WRITTEN POLICY IS IN FINAL DRAFT STAGE AT DASD (EE&S). HOWEVER, SINCE TIME IS OF ESSENCE, PROCEED IMMEDIATELY TO INTERFACE WITH THE INSTALLATION COMMANDER.
BT
#5683

TOR: 052029z AUG80/46
DPDO

MWNN

MAINT

ORIGINAL

ACTION

PRIORITY

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* U N C L A S S I F I E D *
****

PT C0096 196/2001Z

PAGE 01

DISTRIBUTION

- HS — BMO
- HS — ASMO
- HS — NREAD
- HS — Admin D.
- Oper D.
- M&R D.
- Tele D.
- Util D.
- F&A O.
- Prop O.
- MME
- Maint NCO
- Secretary

PRIORITY

//COMM NOTE//
MSG DIST. BY
SSIC (6260)

PTTUZYUW RUEACMC8643 1962001-UUUU--RUEBDOA.
ZNR UUUUU
P R 1415127 JUL 80
FM CMC WASHINGTON DC
TO AIG EIGHT ACT: CG MCB
INFO RUENAAA/CNO WASHINGTON DC
RULSAA/COMNAVFACENGCOM WASHINGTON DC
RUEPIAB/HQ DPDS BATTLE CREEK MI
RUWDPAA/NAVENVSUPPO PORT HUENEME CA
BT
UNCLAS //N06280// SECTION 01 OF 02
CNO PASS TO OP45, COMNAVFACENGCOM PASS TO 1122
SUBJ: MCBUL 6280. DATA CALL FOR DLA-ASSIGNED HAZARDOUS MATERIALS
CMC CODE LFF
REPORT REQUIRED: DATA CALL (REPORT SYMBOL DD-6240-01) (EXTERNAL REPORT SYMBOL DLA (OTN) 2267 (S)), PAR 3
1. RECENT DEFENSE ENVIRONMENTAL QUALITY PROG POLICY MEMO (DEQPPM) PROVIDED REVISED POLICY GUIDANCE FOR DISPOSAL OF HAZARDOUS MATERIALS. MCBUL DETAILING THIS POLICY TO FOLLOW. IN SUMMARY, WITH EIGHT EXCEPTIONS DESCRIBED IN PARS 2A THRU H, DLA HAS BEEN DESIGNATED THE RESPONSIBLE AGENCY WITHIN DOD FOR WORLDWIDE DISPOSAL OF ALL HAZARDOUS MATERIALS PROPERLY PACKAGED AND IDENTIFIABLE BY

PAGE 02 RUEACMC8643 UNCLAS
NSN'S, MFR'S PART NOS., OR MILSPEC NOS.; LOCALLY PURCHASED PROPERTY WITH LOCALLY ASSIGNED STOCK NOS.; AND THAT PROPERTY WHICH BY MILITARY REG REQUIRES APPLICATION OF LOCAL STOCK NO. PRIOR TO DISPOSAL DLA HAS BEEN DIRECTED TO IMPLEMENT THE NEW DEQPPM AS RAPIDLY AS POSSIBLE. IN ORDER FOR DLA TO PROCEED WITH IMPLEMENTATION, DEFENSE PROPERTY DISPOSAL SERVICE (DPDS) HAS ORGANIZED AN INTERSERVICE TASK GROUP TO PLAN ACTIONS AND MILESTONES REQUIRED IN THE SHORT RANGE. THE TASK GROUP HAS PROMULGATED A DATA CALL TO IDENTIFY CURRENT AND PROJECTED WORKLOAD, TECHNICAL ASSISTANCE, ENVIRONMENTAL DOCUMENTATION AVAILABLE, AND EXISTING CONTRACTUAL EFFORT. THIS BULLETIN DETAILS PART I OF THE DATA CALL AND PROVIDES DEFINITIVE GUIDANCE FOR DISTINGUISHING DLA-ASSIGNED HAZARDOUS MATERIALS FROM SERVICE-ASSIGNED HAZARDOUS MATERIALS. PART II OF THE DATA CALL WILL PROVIDE INSTRUCTIONS REGARDING TURN-IN OF HAZARDOUS MATERIALS. DD FORM 1348-1 WILL BE UTILIZED, AND DLA WILL EXTRACT ADDITIONAL DATA REQUIREMENTS THROUGH THIS DOCUMENT.
2. MATERIAL IS HAZARDOUS WHEN, BECAUSE OF ITS QUANTITY, CONCENTRATION, OR PHYSICAL, CHEMICAL, OR INFECTIOUS CHARACTERISTICS, IT MAY CAUSE OR CONTRIBUTE TO AN INCREASE IN MORTALITY OR SERIOUS ILLNESS OR POSE SIGNIFICANT THREAT TO HUMAN HEALTH OR THE ENVIRONMENT WHEN

PAGE 03 RUEACMC8643 UNCLAS
IMPROPERLY TREATED, STORED, TRANSPORTED, DISPOSED OF, OR OTHERWISE MANAGED. THIS INCLUDES PERSONAL PROPERTY, CONSISTING OF ITEMS,

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PRIORITY * U N C L A S S I F I E D *
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ENCLOSURE (2)

1415127 Jul 80

SCRAP, AND WASTE. HAZARDOUS MATERIALS DO NOT INCLUDE RADIOACTIVE MATERIALS CONTROLLED BY THE NUCLEAR REGULATORY COMMISSION. ALL HAZARDOUS MATERIALS ARE ASSIGNED TO DLA FOR DISPOSAL EXCEPT THE FOLLOWING, WHICH ARE RETAINED BY THE SERVICES:

A. TOXICOLOGICAL, BIOLOGICAL, RADIOLOGICAL, AND LETHAL CHEMICAL WARFARE MATERIALS WHICH, BY U.S LAW, MUST BE DESTROYED. DISPOSAL OF THE BYPRODUCTS OF SUCH MATERIAL IS THE RESPONSIBILITY OF THE DOD COMPONENT WITH ASSISTANCE FROM DLA.

B. MATERIAL WHICH CANNOT BE DISPOSED OF IN ITS PRESENT FORM DUE TO MILITARY REGULATIONS: E.G., CONSECRATED RELIGIOUS ITEMS AND CRYPTOGRAPHIC EQUIPMENT.

C. MUNICIPAL-TYPE GARBAGE TRASH, AND REFUSE RESULTING FROM RESIDENTIAL, INSTITUTIONAL, COMMERCIAL, AGRICULTURAL, AND COMMUNITY ACTIVITIES WHICH THE FACIL ENGINEER OR PUBLIC WORKS OFFICER ROUTINELY COLLECTS. HAZARDOUS WASTES SHALL NOT BE COMINGLED WITH MUNICIPAL-TYPE GARBAGE AS A SUBTERFUGE FOR AVOIDING HAZARDOUS WASTE REGULATIONS.

D. CONTRACTOR-GENERATED MATERIALS WHICH ARE THE CONTRACTOR'S

PAGE 04 RUEACMC8643 UNCLAS

RESPONSIBILITY FOR DISPOSAL UNDER THE TERMS OF THE CONTRACT.

E. SLUDGES RESULTING FROM MUNICIPAL-TYPE WASTEWATER TREATMENT FACILS. THE TYPE OF SLUDGE GENERATED IN A DOMESTIC SEWAGE TREATMENT PLANT IS DEFINED BY EPA AS A HAZARDOUS WASTE, BUT WILL BE REGULATED IN THE FUTURE BY EPA THROUGH A SPECIAL PROG ENCOMPASSING REGULATORY ELEMENTS OF BOTH THE CLEAN WATER ACT AND RCRA.

F. SLUDGES AND RESIDUES GENERATED AS A RESULT OF INDUSTRIAL PLANT PROCESSES OR OPERATIONS. THIS EXCEPTION REQUIRES CAREFUL EXPLANATION. THE MERE FACT THAT A PARTICULAR MATERIAL WAS INVOLVED IN A GIVEN INDUSTRIAL PLANT PROCESS OR OPERATION DOES NOT AUTOMATICALLY MEAN THAT IT IS A SLUDGE OR RESIDUE. IT MAY BE AN "ITEM" AS DEFINED IN THE NEW DEQPPM. FOR EXAMPLE, CONTAMINATED SOLVENTS USED IN METAL DEGREASING OR USED PLATING SOLUTIONS IN A PLATING SHOP WOULD NOT BE CLASSIFIED AS SLUDGE OR RESIDUE BUT WOULD BE CLASSIFIED AS USED OR CONTAMINATED ITEMS. THE CHEMICAL COMPOSITION OF SLUDGES OR RESIDUES CANNOT BE DETERMINED WITHOUT EXTENSIVE ANALYTICAL CHEMICAL TESTING. SLUDGES AND RESIDUES ARE USUALLY SOLID OR SEMI-SOLID, AND LIQUIDS ARE USUALLY ITEMS. AN ITEM MAY BE USED, MIXED, AND CONTAMINATED AND STILL BE A DLA RESPONSIBILITY, IF IDENTIFIABLE BY NSN'S.

PAGE 05 RUEACMC8643 UNCLAS

G. REFUSE AND OTHER DISCARDED MATERIALS WHICH RESULT FROM MINING, DREDGING, CONSTRUCTION, AND DEMOLITION OPERATIONS.

H. UNIQUE WASTES AND RESIDUES OF NONRECURRING NATURE WHICH RESEARCH AND DEVELOPMENT EXPERIMENTAL PROGS GENERATE.

3. DLA REQ INFO REGARDING PAST AND PRESENT HAZARDOUS MATERIAL DISPOSAL CONTRACTS AND ASSOCIATED ENVIRONMENTAL DOCUMENTATION, ITEM-

PRIORITY

IZED IN PARS 3A THRU E. ADDRESSEES SHALL COLLECT DATA; COORDINATE WITH FMF UNITS, AS APPROPRIATE; AND RPT BY LTR NLT 22 JUL 1980 TO NAVY ENVIRONMENTAL SUPPORT OFFICE, NAVY ENERGY AND ENVIRONMENTAL SUPPORT ACTIVITY (NAVENENVSA) PORT HUENEME, CA 93043. REPORT SYMBOL DD-6240-01 (EXTERNAL REPORT SYMBOL DLA (OTN) 2267 (S)) HAS BEEN ASSIGNED TO THIS REPORT. PROVIDE COPY OF RPT TO CMC (CODE LFF-2). NEG RESPONSES REQUIRED. POINTS OF CONTACT ARE MR. PAUL HUBBELL (HQMC CODE LFF, AUTOVON 224-1425/-3188) AND MR. KARL KNEELING (NAVENENVSA, AUTOVON 360-4062).

A. DISPOSAL CONTRACTS AWARDED DURING FY79 FOR MATERIAL FOR WHICH DLA HAS ACQUIRED RESPONSIBILITY PER NEW DEQPPM.

(1) IDENTIFICATION OF MATERIAL/COMMODITY.

(2) QUANTITY.

B. DISPOSAL CONTRACTS AWARDED OR IN EFFECT DURING FY80 FOR

BT

#8643

NNNN

PTTUZYUW RUEACMC8644 1962001-UUUU--RUEBDOA.
ZNR UUUUU
P R 1415127 JUL 80
FM CMC WASHINGTON DC
TO AIG EIGHT
INFO RUENAAA/CNO WASHINGTON DC
RULSSAA/COMNAVFACENGCOM WASHINGTON DC
RUEBDAB/HQ DPDS BATTLE CREEK MI
RUWDPAA/NAVENVSUPPO PORT HUENEME CA
BT
UNCLAS //N06290// FINAL SECTION OF 02
MATERIAL FOR WHICH DLA HAS ACQUIRED RESPONSIBILITY PER NEW DEOPPM.
(COPIES OF CONTRACTS MAY BE PROVIDED IN LIEU OF INFORMATION IN
PARS 3B(1) THRU (7).)
(1) CONTRACTOR.
(A) LOCATION OF CONTRACTOR'S OFFICE.
(B) LOCATION OF DISPOSAL SITE.
(C) CONTACT POINT.
(D) TELEPHONE NUMBER.
(2) MATERIAL INCLUDED IN CONTRACT TO INCLUDE CONDITION AND
QUANTITY.
(3) COST DATA.

PRIORITY

PAGE 02 RUEACMC8644 UNCLAS
(4) RESTRICTIONS IN CONTRACT.
(5) EXPIRATION DATE.
(6) CONTACT POINT IN MILITARY SERVICE.
(7) TRANSPORTATION REQUIREMENTS.
(8) EPA, STATE OR LOCAL CONTACT POINT, IF A PERMIT IS RE-
QUIRED.
(9) DISPOSAL METHOD.
(10) LIST OF UNSUCCESSFUL BIDDERS.
(11) AVAILABLE ENVIRONMENTAL DOCUMENTATION. (PROVIDE COPY.)
(12) HOW TO ORTAIN COPY.
C. CONTRACTS AWARDED IN LAST TWO YEARS OR PRESENTLY IN EFFECT
FOR TECHNOLOGY OR PREPARATION OF ENVIRONMENTAL ASSESSMENTS (EA'S)
OR ENVIRONMENTAL IMPACT STATEMENTS (EIS'S) ON DISPOSAL OF HAZARDOUS
MATERIAL WHICH IS NOW DLA'S RESPONSIBILITY. (COPIES OF CONTRACTS
MAY BE PROVIDED IN LIEU OF INFORMATION IN PARS 3C(1) THRU (6).)
(1) CONTRACTOR.
(A) LOCATION.
(B) CONTACT POINT.
(C) TELEPHONE NUMBER.
(2) DESCRIPTION OF SERVICES TO BE PROVIDED.

PAGE 03 RUEACMC8644 UNCLAS
(3) COST DATA.
(4) RESTRICTIONS IN CONTRACT.

PRIORITY

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* U N C L A S S I F I E D *
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PRIORITY

(5) MILESTONES INCLUDED IN CONTRACT.
(6) CONTACT POINT IN MILITARY SERVICE.
(7) HOW TO OBTAIN COPY.

D. EIS'S OR EA'S PREPARED IN-HOUSE DURING THE PAST TWO YEARS CONCERNING USE OR DISPOSAL OF HAZARDOUS MATERIALS NOW ASSIGNED TO DLA FOR DISPOSAL (COPIES OF EIS'S/EA'S MAY BE PROVIDED IN LIEU OF INFORMATION IN PARS 3D(1) THRU (7).)

(1) NAME OF RESPONSIBLE FEDERAL AGENCY.
(2) WHO PREPARED
(3) DATE OF APPROVAL.
(4) SUBJ OF ENVIRONMENTAL IMPACT STATEMENT OR ENVIRONMENTAL ASSESSMENT.
(5) LOCATION OF ACTION IF SITE SPECIFIC.
(6) WHERE EIS/EA IS FILED.
(7) CONTACT POINT AND TELEPHONE NUMBER
(8) HOW TO OBTAIN COPY.

E. TRANSFORMERS AND DIELECTRIC FLUIDS WAITING LABORATORY TEST FOR PCB CONTENT IN PREPARATION FOR TURN-IN TO DPDO

PAGE 04 RUEACMC8644 UNCLAS

(1) NSN.
(2) QUANTITY AND UNIT OF ISSUE.
(3) LOCATION AND SERVICING DPDO.
(4) TESTING SCHEDULE, IF ANY.

4. THIS BULLETIN CANCELED 31 DEC 1980.

BT

#8644

NNNN

ACT: FAC
INFO: MANP, TRNG, SAFD, CBC, CPO, PWO
NRMC /47

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PRIORITY * U N C L A S S I F I E D *
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PRIORITY

PRIORITY **********
* U N C L A S S I F I E D *
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PT 00321 197/2057Z

PAGE 01

BUA 657

PTTNZYUW RUEACMC9092 1972040-UUUU--RUCRNAA.
ZNR UUUUU
P R 1515157 JUL 80 1/
FM CMC WASHINGTON DC
TO ALMAR
INFO RUENAAA/CNO WASHINGTON DC
RULSSAA/COMNAVFACENGCOM WASHINGTON DC
RUEBUAB/HQ DPDS BATTLE CREEK MI
RUWDPAA/NAVENVSUPPO PORT HUENEME CA
BT
UNCLAS //04570//
ALMAR120/80
SUBJ: MCBUL 4570. PART II OF DATA CALL FOR DLA-ASSIGNED HAZARDOUS MATERIALS
(CMC CODE LMM-2)
A. MCBUL 6280 OF 14 JUL 1980 (NOTAL)
B. DOD 4160.21-M
C. DOD 4000.25-D
1. RECENT DEFENSE ENVIRONMENTAL QUALITY PROG POLICY MEMO (DEQPPM) GUIDANCE REVISED WORLDWIDE DOD DISPOSAL POLICY FOR HAZARDOUS MATERIALS (HM) ASSIGNING PRIMARY RESP TO DLA. PART I OF THIS DATA CALL WAS DIRECTED TO MARINE CORPS FACILITIES WHICH HAVE BEEN

PAGE 02 RUEACMC9092 UNCLAS
RESPONSIBLE FOR HM DISPOSAL IN THE PAST AND REQ SELECTED INFO ON RECENT DISPOSAL ACTIONS (REF A APPLIES).
2. DLA HAS PART II OF THE DATA CALL ON HM (PROPERLY IDENTIFIABLE AND BEING HELD BY THE MARINE CORPS) AS FOLLOWS. IN ORDER TO DETERMINE THE MAGNITUDE OF THE PROBLEM, ADDEES SHALL PREPARE AND SUBMIT A VALID DISPOSAL TURN-IN DOCUMENT (DTID) (DD FORM 13481) FOR ALL EXCESS HM WHICH DLA IS RESPONSIBLE FOR AND REMAIN ON ADDEES ACCOUNTABLE RECORDS. SERVICING DPDO'S WILL NOW ACCEPT ACCOUNTABILITY FOR THIS MATERIAL. HOWEVER, THE PROPERTY MUST REMAIN IN ADDEES CUSTODY PENDING FINAL DISPOSITION INSTRUCTIONS. PROPER IDENTIFICATION, PACKAGING, AND LABELING (IAW REF B) REMAIN THE RESPONSIBILITY OF THE TURN-IN ACTIVITY. THE BASIC CRITERIA IS THAT THE MATERIAL MUST BE PACKAGED FOR SAFE HANDLING. THE DTID MUST BE IN THE HANDS OF THE SERVICING DPDO NOT LATER THAN 13 AUG 1980. EACH DTID MUST CLEARLY IDENTIFY THE FOLLOWING:
A. IDENTIFICATION OF THE HM. INCLUDES NSN AND IDENTIFICATION OF TYPES OF CONTAMINANTS AND THE AMOUNT OF EACH CONTAMINANT IN THE ITEM.
B. NSN'S MUST INCLUDE COMPLETE DESCRIPTION AS WELL AS IDENTIFICATION OF THE TYPES AND AMOUNTS OF CONTAMINANTS.
C. QUANTITY WHICH IS CURRENTLY EXCESS.

PAGE 03 RUEACMC9092 UNCLAS

PRIORITY **********
* U N C L A S S I F I E D *
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ENCLOSURE (3)

PRIORITY
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* U N C L A S S I F I E D *
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D. CONDITION. THE SUPPLY CONDITION CODE (A THROUGH H) SHOULD BE SUPPLEMENTED WITH ADDITIONAL INFORMATION WHEN NECESSARY.

E. TO PERMIT VALID IDENTIFICATION OF THESE TYPES OF TURN-INS AND TO FURTHER DETERMINE THE WORKLOAD INVOLVED, BY VOLUME AND SPECIFIC TYPES OF GENERATIONS, THE FOLLOWING ACTIONS MUST BE TAKEN ON THE DTID:

(1) THE DOD AAC, AS RECOGNIZED IN REF C, MUST BE ASSIGNED TO THE ACTIVITY WHERE THE PROPERTY IS PHYSICALLY LOCATED.

(2) BLOCK D OF THE DTID SHALL BE MARKED "HZ" TO IDENTIFY THIS AS AN HM TURN-IN.

THESE INSTRUCTIONS SPECIFICALLY INCLUDE DIELECTRIC FLUIDS AND TRANSFORMERS, WHETHER OR NOT THE TRANSFORMERS CONTAIN PCB OR PCB-CONTAMINATED FLUIDS. ALL OF THESE FLUIDS AND TRANSFORMERS MUST BE LABORATORY-TESTED AND TEST RESULTS STATING PCB IN PART PER MILLION ATTACHED TO THE DTID. THOSE FLUIDS AND TRANSFORMERS WITHOUT TEST RESULTS ARE SPECIFICALLY EXCLUDED FROM THIS TURN-IN ACTION.

3. COSTS OF CHEMICAL ANALYTICAL TESTING ASSOCIATED WITH THIS ONE-TIME DATA CALL MAY BE CHARGED TO THE NAVY ENVIRONMENTAL PROTECTION SUPPORT SERVICE (NEPSS) CENTRALLY MANAGED POLLUTION ABATEMENT FUNDS ADMINISTERED BY COMNAVFACENGCOM. MARINE CORPS FIELD ACTIVITIES MAY

PAGE 04 RUEAC#C9092 UNCLAS

ARRANGE FOR TESTING THROUGH THE COGNIZANT EFD OF THE NAVFACENGCOM. IT IS EMPHASIZED THAT THE TERMINATION OF THE DATA CALL IS 13 AUG 1980. ACCORDINGLY, FUNDS FOR TESTING WILL NOT BE AVAILABLE SUBSEQUENT TO THAT DATE.

4. POINTS OF CONTACT REGARDING THIS PHASE OF THE DATA CALL ARE MR. PAUL HUBBELL (CMC CODE LFF), AUTOVON 224-1425/3188, ON TESTING AND FUNDING, AND MR. R. H. MITCHELL (CMC CODE LMM), AUTOVON 224-1600/1795, ON DISPOSAL POLICY AND TURN-IN DOCUMENTATION.

5. THIS BULLETIN IS APPLICABLE TO THE MCR.

6. THIS BULLETIN CANCELED 31 DEC 1980.

BT
#9092

NNNN

ACT: SUPS /26
INFO: DPDO, FSMAO-1 IAW ENCLOSURE (2) OF CURRENT CG MCB LTR (SSIC 2340)

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PRIORITY * U N C L A S S I F I E D *
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RECEIVED
JUL 16 1980
DPDO — LEJEUNE

MAIN/DDS/th
6240

SEP 0 9 1980

From: Base Maintenance Officer
To: Assistant Chief of Staff, Facilities

Subj: Hazardous Materials Management Program; requirements of

Ref: (a) Resource Conservation and Recovery Act (RCRA)
(b) MCBul 6280 of 1 May 1980

Encl: (1) DPDO memo of 8 Aug 1980 w/attachments
(2) CMC Washington DC 141512Z June 1980
(3) CMC Washington DC 151515Z June 1980

1. This memorandum outlines the significance of recent DOD decisions regarding the implementation of references (a) and (b). Deputy Assistant Secretary of Defense Marienthal determined that installation commanders would be the responsible official regarding compliance with RCRA notification procedures for DPDO hazardous waste activities. This determination outlined in enclosure (1) may impact adversely on the subject program being developed to implement references (a) and (b) at Camp Lejeune. Enclosures (2) and (3) indicate that the Defense Logistic Agency (DLA) has been assigned primary responsibility for hazardous material disposal with certain excepted categories of hazardous wastes. By not registering DPDO with EPA as a generator, transporter, or storer of hazardous waste, DPDO activities in these areas will have to be carried out under the authority of the Commanding General, Marine Corps Base, in order to comply with reference (a). Consequently, Marine Corps Base will retain legal responsibility for all hazardous waste activity up to the point that wastes are delivered to an EPA approved disposal/storage site.

2. The base program currently being developed anticipated a 12-24 months transition period before the local DPDO could develop the facilities and manpower to assume responsibility for hazardous waste storage and disposal. Consequently, this apparent conflict should not cause any significant problem for the short run. However, previous assumptions that DLA would at some point in time take a leading role in the subject program, thereby relieving base from much of the manpower and disposal costs of the subject program, is now in question. It is therefore recommended that appropriate contact be made with HQMC to request clarification of this issue and guidance regarding manpower and funding for this program. It is also recommended that HQMC be informed of the advantage to base of DPDO/DLA being the lead agency operating independently of base.

B. W. ELSTON
Acting Base Maintenance Officer

ROUTING SLIP DEC 5 1980

	ACTION	INFO	INITIAL
BMO		✓	
ABMO		✓	
ADMIN		✓	
ENVIRON AFF			
F&A BRANCH			
MAINT NCO			
M&R			
OPNS			
PROP			
TELE			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 12 Dec 80

TO:

BASE MAINT O	DIR, QUARTERS & HOUSING
PUBLIC WORKS O	DIR, BOQ/BSQ
COMM-ELECT O	BASE FIRE CHIEF
MOTOR TRANSPORT O	

ATTN: _____

1. Attached is forwarded for info/~~action.~~

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

3. Your file copy

SSGT Prescott
By dir

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

MCBCL 5216/21

ROUTINE

****
* U N C L A S S I F I E D *
****

PT 00247 346/0839Z

FAC ROUTING

	ACTION	INFO	INT
FACO			
4A			80
4B			
4C			
4D			
4G			
4LC			

FAC

RTTUZYUW RULSSGG7745 3452043-UUUU--RUEBDOA.
ZNR UUUUU
RUCLEDB T WPNSTA CHARLESTON SC
RUCLECB T CG MCAS CHERRY PT NC
RUCLEVA T CG FOURTH MARDIV
RUEAHOF T COMNAVFACENGCOM ALEXANDRIA VA
RUEBHHA T USNA ANNAPOLIS MD
RUHQHOA T CG FMFPAC
RULYLKA T COMCBLANT NORFOLK VA
R 102013Z DEC 80
FM COMNAVSUPSYSCOM WASHINGTON DC
TO ALL CONUS NAVY SHIPPERS INFO: CG MCB
BT
UNCLAS //N04600//
SUBJ: HAZARDOUS MATERIAL SHIPMENT VIOLATIONS
1. RECENT INCIDENTS BY SOME NAVY SHIPPERS CONCERNING VIOLATIONS OF CODE OF FEDERAL REGULATIONS (CFR) 49, PART 176.83(B) HAVE RESULTED IN SUBSTANTIAL MONETARY FINES BEING LEVIED BY THE U.S. COAST GUARD AGAINST DEPARTMENT OF DEFENSE PERSONNEL RESPONSIBLE FOR CERTIFICATION FOR SHIPMENT OF HAZARDOUS MATERIALS. ACCORDINGLY, THE FOLLOWING INFORMATION REGARDING HAZARDOUS CARGO INFORMATION IS PROVIDED:
A. CFR 49 CONTAINS PROCEDURES FOR THE IDENTIFICATION, MARKING, STOWAGE AND DOCUMENTATION OF HAZARDOUS MATERIAL SHIPMENTS MOVING WITHIN CONUS BY ALL MODES OF TRANSPORTATION.
B. THE INTERNATIONAL MARITIME DANGEROUS GOODS CODE (IMCO) PUBLICATION IS DESIGNED TO AID SHIPPERS IN COMPLYING WITH LEGAL REQUIREMENTS OF THE INTERNATIONAL CONVENTION FOR THE SAFETY OF LIFE AT SEA, REGARDING THE CARRIAGE OF DANGEROUS GOODS BY SEA.
2. THESE REGULATIONS CONTAIN GENERAL REQUIREMENTS FOR THE MOVEMENT

PAGE 02 RULSSGG7745 UNCLAS
OF SUCH MATERIALS AND ALSO INCLUDE SPECIFIC GUIDELINES FOR THE SHIPMENT OF EXPLOSIVES, COMPRESSED GASES, FLAMMABLE/COMBUSTIBLE LIQUIDS, FLAMMABLE SOLIDS, POISONS, RADIOACTIVE MATERIALS AND OTHER ITEMS WHICH, BY VIRTUE OF THEIR COMPATIBILITY NATURE, BECOME HAZARDOUS WHEN MOVED VIA SPECIFIC TRANSPORT MODES.
3. REQUEST ADDEES ENSURE COMPLIANCE WITH CFR 49 AND IMCO PUBLICATIONS, AS APPLICABLE, TO PRECLUDE FURTHER INCIDENTS OF THE TYPE MENTIONED IN PARA 1 ABOVE.
4. ADDITIONALLY, THOSE ACTIVITIES REQUIRING BASIC OR REFRESHER TRAINING FOR PERSONNEL ENGAGED IN CERTIFYING HAZARDOUS MATERIALS SHIPMENTS ARE REQUESTED TO MAKE NECESSARY ARRANGEMENTS FOR ATTENDANCE AT APPROVED COURSES AS LISTED IN DOD 5010.16-C (DEFENSE MANAGEMENT AND EDUCATION AND TRAINING).
BT
#7745

NNNN

INFO: LOGS, TRNG, SPTDIV, FSMAO-1, PERS, PO, ADJ, MANP, EOD, DSSC, MCES, (FAC), RRDET, TMO/14

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* U N C L A S S I F I E D *
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102013Z Dec 80

10 20 13Z DEC

POUTING SLIP

ACTION	INFO	INITIAL
	✓	M
	✓	
	✓	

MAIN/DDS/mp
8542 6280

FEB 1 3 1981 /pwh
4510

NOV 04 1980

From: Commanding General
To: Commanding General, 2d Marine Division, FMF, Camp Lejeune, North Carolina 28542

Subj: Disposal of Lithium Organic Batteries

Ref: (a) CG 2dMarDiv ltr 3/KFS/pwh 4510 of 4 Nov 1980
(b) NAVSEA INST 9310.1 of 30 Mar 1979

Encl: (1) CG MCB CamLej msg 192111Z Nov 80
(2) CG 2dFSSG CamLej msg 202110Z Nov 80

1. Enclosures (1) and (2) are provided as requested by reference (a). Enclosure (1) outlines current procedures to be followed for disposal of the subject batteries aboard this installation. Enclosure (2) provides guidance on requesting assistance from 2d Force Service Support Group personnel responsible for implementation of paragraph 8A of enclosure (1).

2. Until such time as subject batteries are disposed of by the Defense Property Disposal Officer, it is recommended thatthe batteries be stored in accordance with references (a) and (b).

3. Point of contact in this matter is Mr. DannySharpe, Natural Resources and Environmental Affairs Division, Base MaintenanceDepartment, extensions 5003/2083.

F. H. MOUE
By direction

Bend "LET'S THINK OF A FEW REASONS
Copy to: WHY IT CAN BE DONE"
Acls Fac

MCBCL 5216/21

fold or discard
Haz waste

MAIN/DS/mp
6240

DEC 9 1980

From: Base Maintenance Officer
To: Base Motor Transport Officer

Subj: State Hazardous Waste Regulations; requirements of

Ref: (a) FONECON btwn Mr. Barto, Base Motor Transport, and Mr. Danny Sharpe BMainDept of 5 Dec 1980
(b) North Carolina Department of Human Resources (O. W. Strickland) ltr of 1 Nov 1980
(c) Resource Conservation and Recovery Act of 1976 (NOTAL)
(d) Marine Corps Base 192111Z Nov 1980

Encl: (1) Environmental Protection Agency Regulations for Hazardous Waste Transporters 40 CFR part 263

1. This letter is to confirm information provided during reference (a) regarding state hazardous waste regulations outlined in reference (b) and related federal regulations outlined in enclosure (1), which were developed by Environmental Protection Agency (EPA) to implement reference (c). Reference (d) also pertains.

2. This office has prepared and submitted the required notifications and permit applications to the Environmental Protection Agency which are discussed in paragraph (2) of reference (b).

3. Point of contact with this matter is Mr. Danny Sharpe, Base Maintenance Department, telephone 5003, 2083, or 2195.

J. I. WOOTEN
By direction

ENVIRONMENTAL PROTECTION AGENCY REGULATIONS FOR HAZARDOUS WASTE TRANSPORTERS

(40 CFR 263; 45 FR 12743, February 26, 1980, Effective August 26, 1980; Revised by 45 FR 33151, May 19, 1980, Effective November 19, 1980)

[*Editor's note:* In a separate notice, EPA February 26, 1980, published a notification form for use by generators, transporters, and operators engaged in hazardous waste activities (45 FR 12746). That form is published with the regulations for generators, page 161:1901.]

New Parts 122, 123, and 124, EPA's consolidated permit program regulations, are published in Environmental Reporter — Federal Regulations — 1, at 101:0701, 101:0751, and 101:0801, respectively.

PART 263—STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE

Subpart A—General

Sec.
263.10 Scope.
263.11 EPA Identification Numbers.

Subpart B—Compliance With the Manifest System and Recordkeeping

263.20 The Manifest System.
263.21 Compliance with the Manifest.
263.22 Recordkeeping.

Subpart C—Hazardous Waste Discharges

263.30 Immediate Action.
263.31 Discharge Clean Up.

Authority: Sec. 2002(a), 3002, 3003, 3004 and 3005 of the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act of 1976 and as amended by the Quiet Communities Act of 1978, (42 U.S.C. 6912, 6922, 6923, 6924, 6925).

Subpart A—General

§ 263.10 Scope.

(a) These regulations establish standards which apply to persons transporting hazardous waste within the United States if the transportation requires a manifest under 40 CFR Part 262.

Note.—The regulations set forth in Parts 262 and 263 establish the responsibilities of generators and transporters of hazardous waste in the handling, transportation, and management of that waste. In these regulations, EPA has expressly adopted certain regulations of the Department of Transportation (DOT) governing the transportation of hazardous materials. These regulations concern, among other things, labeling, marking, placarding, using proper containers, and reporting discharges. EPA has expressly adopted these regulations in order to satisfy its statutory obligation to promulgate regulations which are necessary to protect human health and the environment in the transportation of hazardous waste. EPA's adoption of these DOT regulations ensures consistency with the requirements of DOT and thus avoids the establishment of duplicative or conflicting requirements with respect to these matters. These EPA regulations which apply to both interstate and intrastate transportation of hazardous waste are enforceable by EPA.

DOT has revised its hazardous materials transportation regulations in order to encompass the transportation of hazardous waste and to regulate intrastate, as well as interstate, transportation of hazardous waste. Transporters of hazardous waste are cautioned that DOT's regulations are fully applicable to their activities and enforceable by DOT. These DOT regulations are codified in Title 49, Code of Federal Regulations, Subchapter C.

EPA and DOT worked together to develop standards for transporters of hazardous waste in order to avoid conflicting requirements. Except for transporters of bulk shipments of hazardous waste by water, a transporter who meets all applicable requirements of 49 CFR Parts 171 through 179 and the requirements of 40 CFR sections 263.11 and 263.31 will be deemed in compliance with this Part. Regardless of DOT's action, EPA retains its authority to enforce these regulations.

(b) These regulations do not apply to on-site transportation of hazardous waste by generators or by owners or operators of permitted hazardous waste management facilities.

(c) A transporter of hazardous waste must also comply with 40 CFR Part 262, Standards Applicable to Generators of Hazardous Waste, if he:

(1) Transports hazardous waste into the United States from abroad; or

(2) Mixes hazardous wastes of different DOT shipping descriptions by placing them into a single container.

Note.—Transporters who store hazardous waste are required to comply with the storage standards in 40 CFR Parts 264 and 265 and the permit requirements of 40 CFR Part 122.

§ 263.11 EPA identification number.

(a) A transporter must not transport hazardous wastes without having received an EPA identification number from the Administrator.

(b) A transporter who has not received an EPA identification number may obtain one by applying to the Administrator using EPA Form 8700-12. Upon receiving the request, the Administrator will assign an EPA identification number to the transporter.

Subpart B—Compliance With the Manifest System and Recordkeeping

§ 263.20 The manifest system.

(a) A transporter may not accept hazardous waste from a generator unless it is accompanied by a manifest, signed by the generator in accordance with the provisions of 40 CFR Part 262.

(b) Before transporting the hazardous waste, the transporter must sign and date the manifest acknowledging acceptance of the hazardous waste from the generator. The transporter must return a signed copy to the generator before leaving the generator's property.

(c) The transporter must ensure that the manifest accompanies the hazardous waste.

(d) A transporter who delivers a hazardous waste to another transporter or to the designated facility must:

(1) Obtain the date of delivery and the handwritten signature of that transporter or of the owner or operator of the designated facility on the manifest; and

(2) Retain one copy of the manifest in accordance with § 263.22; and

(3) give the remaining copies of the manifest to the accepting transporter or designated facility.

(e) The requirements of paragraphs (c) and (d) of this section do not apply to rail or water (bulk shipment) transporters if:

(1) The hazardous waste is delivered by rail or water (bulk shipment) to the designated facility; and

(2) A shipping paper containing all the information required on the manifest (excluding the EPA identification numbers, generator certification, and signatures) accompanies the hazardous waste; and

[Sec. 263.20(e)(2)]

Enclosure 1

(3) The delivering transporter obtains the date of delivery and handwritten signature of the owner or operator of the designated facility on either the manifest or the shipping paper; and

(4) The person delivering the hazardous waste to the initial rail or water (bulk shipment) transporter obtains the date of delivery and signature of the rail or water (bulk shipment) transporter on the manifest and forwards it to the designated facility; and

(5) A copy of the shipping paper or manifest is retained by each rail or water (bulk shipment) transporter in accordance with § 263.22.

(f) Transporters who transport hazardous waste out of the United States must:

(1) indicate on the manifest the date the hazardous waste left the United States; and

(2) sign the manifest and retain one copy in accordance with § 263.22(c); and

(3) return a signed copy of the manifest to the generator.

§ 263.21 Compliance with the manifest.

(a) The transporter must deliver the entire quantity of hazardous waste which he has accepted from a generator or a transporter to:

(1) The designated facility listed on the manifest; or

(2) The alternate designated facility, if the hazardous waste cannot be delivered to the designated facility because an emergency prevents delivery; or

(3) The next designated transporter; or

(4) The place outside the United States designated by the generator.

(b) If the hazardous waste cannot be delivered in accordance with paragraph (a) of this section, the transporter must contact the generator for further directions and must revise the manifest according to the generator's instructions.

§ 263.22 Recordkeeping.

(a) A transporter of hazardous waste must keep a copy of the manifest signed by the generator, himself, and the next designated transporter or the owner or operator of the designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter.

(b) For shipments delivered to the designated facility by rail or water (bulk shipment), each rail or water (bulk shipment) transporter must retain a copy of a shipping paper containing all the information required in § 263.20(e)(2) for a period of three years from the date the hazardous waste was accepted by the initial transporter.

(c) A transporter who transports hazardous waste out of the United States must keep a copy of the manifest indicating that the hazardous waste left the United States for a period of three years from the date the hazardous waste was accepted by the initial transporter.

(d) The periods of retention referred to in this Section are extended automatically during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator.

Subpart C—Hazardous Waste Discharges

§ 263.30 Immediate action.

(a) In the event of a discharge of hazardous waste during transportation, the transporter must take appropriate immediate action to protect human health and the environment (e.g., notify local authorities, dike the discharge area).

(b) If a discharge of hazardous waste occurs during transportation and an official (State or local government or a Federal Agency) acting within the scope of his official responsibilities determines that immediate removal of the waste is necessary to protect human health or the environment, that official may authorize the removal of the waste by transporters who do not have EPA identification numbers and without the preparation of a manifest.

(c) An air, rail, highway, or water transporter who has discharged hazardous waste must:

(1) Give notice, if required by 49 CFR 171.15, to the National Response Center (800–424–8802 or 202–426–2675); and

(2) Report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. 20590.

(d) A water (bulk shipment) transporter who has discharged hazardous waste must give the same notice as required by 33 CFR 153.203 for oil and hazardous substances.

§ 263.31 Discharge clean up.

A transporter must clean up any hazardous waste discharge that occurs during transportation or take such action as may be required or approved by Federal, State, or local officials so that the hazardous waste discharge no longer presents a hazard to human health or the environment.

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(2) A shipping paper containing all the information required on the manifest (excluding the EPA identification numbers, generator certification, and signatures) accompanies the hazardous waste; and

[Sec. 263.20(e)(2)]

(Enclosure 1)

(3) The delivering transporter obtains the date of delivery and handwritten signature of the owner or operator of the designated facility on either the manifest or the shipping paper; and

(4) The person delivering the hazardous waste to the initial rail or water (bulk shipment) transporter obtains the date of delivery and signature of the rail or water (bulk shipment) transporter on the manifest and forwards it to the designated facility; and

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(b) For shipments delivered to the designated facility by rail or water (bulk shipment), each rail or water (bulk shipment) transporter must retain a copy of a shipping paper containing all the information required in § 263.20(e)(2) for a period of three years from the date the hazardous waste was accepted by the initial transporter.

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(c) An air, rail, highway, or water transporter who has discharged hazardous waste must:

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(d) A water (bulk shipment) transporter who has discharged hazardous waste must give the same notice as required by 33 CFR 153.203 for oil and hazardous substances.

§ 263.31 Discharge clean up.

A transporter must clean up any hazardous waste discharge that occurs during transportation or take such action as may be required or approved by Federal, State, or local officials so that the hazardous waste discharge no longer presents a hazard to human health or the environment.

PRIORITY * U N C L A S S I F I E D *
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PT 00356 303/2232Z

PAGE 01

PTTUZYUW RUCLFTA8682 3032048-UUUU--RUEBDOA.
ZNR UUUUU
P 291930Z OCT 80
FM DPDR-COMDR MEMPHIS TN
TO ATG 4544 //ACT: DPDO//
BT
UNCLAS DPDR-MR 374-80 SECTION ONE OF TWO. PASS TO DEFENSE PROPERTY DISPOSAL OFFICE. SUBJECT: POLICY GUIDANCE.
1. THE FOLLOWING MESSAGES ARE SUPERSEDED UPON RECEIPT OF THIS POLICY GUIDANCE:
A. DPDS-LPE MESSAGE, DTG 132052Z JUNE 80, SUBJECT: INTERIM GUIDELINES ON EXPANDED MISSION.
B. DPDS-LPE MESSAGE, DTG 161917Z JULY 80, SUBJECT: IMPLEMENTATTON OF DOD HAZARDOUS MATERIAL DISPOSAL POLICY.
C. DPDS-LPE MESSAGE, DTG 101213Z, SEP 80, SUBJECT: CLARIFICATION OF TESTING REQUIREMENTS FOR TURN-IN UNDER DEQPPM NO. 80-5.
D. DPDS-LPE MESSAGE, DTG 191835Z, SEP 80, SUBJECT: HAZARDOUS MATERIALS DISPOSAL PROCEDURES.
E. DPDS-LPE MESSAGE, DTG P292040Z, SEP 80, SUBJECT: HAZARDOUS MATERIALS DISPOSAL POLICY.
2. EFFECTIVE 1 NOVEMBER 1980, THE FOLLOWING ACTION WILL BE

PAGE 02 RUCLFTA8682 UNCLAS
TAKEN WHEN RECEIVING HAZARDOUS PROPERTY AND IS IDENTIFIED AS PHASE I OF A TWO PHASE OPERATION:
A. DPDOS WILL ACCEPT ACCOUNTABILITY FOR ALL HAZARDOUS MATERIALS EXCEPT THOSE CATEGORIES SPECIFICALLY EXCLUDED IN SUB-PARAGRAPH F BELOW.
B. PRIOR TO RECEIPT OF ACCOUNTABILITY THESE MATERIALS, THEY MUST, REPEAT MUST BE PROPERLY IDENTIFIED, PACKAGED, AND LABELED AND MUST BE IN NON-LEAKING CONTAINERS AND SAFE TO HANDLE (DPDOS DETERMINATION).
C. LABORATORY ANALYSIS IS NOT REQUIRED FOR TURN-IN OF ANYTHING OTHER THAN PCBS. HOWEVER, ALL CONTAMINANTS MUST BE IDENTIFIED AND STATED ON THE DTIDS.
D. THE ACCOUNTABILITY WILL BE ACCEPTED REGARDLESS OF THE R/T/D OR SALES POTENTIAL OF THE MATERIAL.
E. ACCEPTING PHYSICAL CUSTODY OF HAZARDOUS MATERIALS WILL BE WITHIN THE FOLLOWING GUIDELINES:
(1) IF THE DPDO POSSESSES CONFORMING STORAGE, THE PDO WILL ACCEPT PHYSICAL CUSTODY AT THE TIME IT ACCEPTS PHYSICAL ACCOUNTABILITY.
(2) IF THE DPDO DOES NOT POSSESS THE CONFORMING

PAGE 03 RUCLFTA8682 UNCLAS
STORAGE AND THE GENERATING ACTIVITY HAS CONFORMING STORAGE IN SUPPORT OF MISSION REQUIREMENTS, THE GENERATING ACTIVITY WILL

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PRIORITY * U N C L A S S I F I E D *
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PRIORITY * U N C L A S S I F I E D *
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RETAIN PHYSICAL CUSTODY AND THE DPDO WILL ACCEPT ACCOUNTABILITY.
(3) IN THOSE INSTANCES WHERE NEITHER THE DPDO NOR THE GENERATING ACTIVITY POSSESSES THE CONFORMING STORAGE, THE ACTIVITY WITH THE "MOST NEARLY" CONFORMING STORAGE WILL ACCEPT OR RETAIN PHYSICAL CUSTODY AND THE DPDO WILL ACCEPT ACCOUNTABILITY.
(4) IF THE DPDO AND THE GENERATING ACTIVITY CANNOT MUTUALLY AGREE ON THE BEST PROCEDURE FOR STORAGE AND HANDLING PENDING FINAL DISPOSAL THE ISSUE SHALL BE REFERRED AT ONCE THROUGH DPDR-MR TO HEADQUARTERS (DPDS) FOR RESOLUTION.
(5) THE DEFENSE LOGISTICS AGENCY (DLA) WILL BE RESPONSIBLE FOR THE LONG TERM PROGRAMMING OF MILITARY CONSTRUCTION FUNDING FOR CONFORMING STORAGE IN SUPPORT OF ITS DISPOSAL MISSION.
(6) ANY REPACKAGING REQUIRED AFTER ACCEPTANCE OF ACCOUNTABILITY FROM THE GENERATING ACTIVITY WILL BE THE RESPONSIBILITY OF THE DPDO.
PRIORITY
F. THE GENERATING ACTIVITIES SHALL BE RESPONSIBLE FOR DISPOSAL OF THE FOLLOWING CATEGORIES OF HAZARDOUS MATERIAL WHICH HAS NOT BEEN

PAGE 04 RUCLFTA8682 UNCLAS
ASSIGNED TO DLA:
(1) TOXICOLOGICAL, BIOLOGICAL, RADIOLOGICAL, AND LETHAL CHEMICAL WAREFARE MATERIALS WHICH, BE U.S. LAW, MUST BE DESTROYED. DISPOSAL OF THE BY-PRODUCT OF SUCH MATERIAL IS THE RESPONSIBILITY OF THE DOD COMPONENT WITH ASSISTANCE FROM DLA.
(2) MATERIAL WHICH CANNOT BE DISPOSED OF IN ITS PRESENT FORM DUE TO MILITARY REGULATIONS, E.G., CONSECRATED RELIGIOUS ITEMS AND CRYPTOGRAPHIC EQUIPMENT.
(3) MINICIPAL TYPE GARBAGE, TRASH, AND REFUSE RESULTING FROM RESIDENTIAL, INSTITUTIONAL, COMMERCIAL, AGRICULTURAL, AND COMMUNITY ACITIVITIES, WHICH THE FACILITY ENGINEER OR PUBLIC WORKS OFFICE ROUTINELY COLLECT.
(4) CONTRACTORY GENERATED MATERIALS WHICH ARE THE CONTRACTORS'S RESPONSIBLITY FOR DISPOSAL UNDER THE TERMS OF THE CONTRACT.
(5) SLUDGE RESULTING FROM MUNICIPAL TYPE WASTEWATER TREATMENT FACILITIES.
(6) SLUDGE AND RESIDUES GENERATED AS A RESULT OF INDUSTRIAL PLANT PROCESSES OR OPERATIONS.
EXAMPLE NR 1: ELECTROPLATING PROCESS. CHEMICALS ARE DRAWN

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FROM THE SUPPLY SYSTEM, PUT IN TANKS AND THE MATERIAL TO BE ELECTROPLATED IS DIPPED IN THE TANKS. WHEN THESE FLUIDS BECOME CONTIMINATED, AND ARE NO LONGER SUITABLE FOR CONTINUED USE, THE GENERATING ACTIVITY WILL DRUM THE SOLVENT, PUT THE NSN, ITEM NAME AND IF APPLICABLE ANY OTHER IDENTIFYING INFORMATION ON THE DRUM AND TURN THE DRUM IN TO THE DPDO ON A PROPERLY PREPARED

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DTID FOR DISPOSITION. RINSE SOLUTION, USED TO RINSE THE ELECTRO-PLATED MATERIAL, GOES TO A DRAIN, THEN TO A HOLDING TANK OR PLANT.. THIS RINSE WATER WILL NOT BE ACCEPTED BY THE DPDO FOR DISPOSAL. THIS MATERIAL IS CONSIDERED RESIDUE FROM AN INDUSTRIAL PLANT PROCESS AND IS THEREFORE, ONE OF THE EIGHT CATEGORIES OF PROPERTY WHICH DPDOS DO NOT HAVE DISPOSAL RESPONSIBILITY.

EXAMPLE NR 2: ~~MAINENANCE OPERATION~~. SOLVENT DRAWN FROM THE ~~GS~~ SUPPLY SYSTEM FOR CLEANING VEHICLE PARTS, HEAVY EQUIPMENT PARTS "ETC." AND PUT IN OPEN DRUMS OR TANKS FOR USE. WHEN PARTS ARE WASHED IN THIS SOLUTION, IT BECOMES CONTAMINATED WITH ALL TYPES OF FOREIGN MATTERS, GREASE, GRAVEL, DIRT, ET., WHICH SETTLES TO THE BOTTOM OF THE CONTAINER. THIS SOLVENT WILL NOT BE ACCEPTED BY THE DPDO UNLESS THE SOLVENT IS DRAINED BY THE GENERATING ACTIVITY AND PROPERLY DRUMMED AS STATED IN EXAMPLE NR 1, ABOVE. AFTER

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Solvent from this process will be accepted by the DPDO for Disposition.

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PRIORITY * U N C L A S S I F I E D *
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PT 00357 303/22337 PAGE 01

PTTUZYUW PUCLFTA8685 3032048-UUUU--RUEBDOA.
ZNR UUUUU
P 291930Z OCT 80
FM DPDR-COMDR MEMPHIS TN
TO AIG 4544
BT
UNCLAS FINAL SECTION OF TWO.
PROPER PACKING. THIS TYPE MATERIAL WILL BE ACCEPTED BY THE DPDO FOR DISPOSAL. SLUDGE SEDIMENT RESULTING FROM THIS PROCESS WILL NOT BE ACCEPTED BY THE DPDO FOR DISPOSAL. THIS MATERIAL WILL BE DISPOSED OF BY THE GENERATING ACTIVITY.
(7) ANY QUESTION REGARDING ACCEPTANCE OF ACCOUNTABILITY FOR MATERIAL WILL BE REFERRED TO THE OPERATIONS DIVISION (DPDR-MR) PRIOR TO ACCEPTANCE.
(8) DPDOS WILL NOT ACCEPT MATERIAL THAT IS PRESENTLY BEING DISPOSED OF BY THE DOD COMPONENTS VIA EXISTING SERVICE CONTRACT. THIS PORTION OF THE DLA/DPDO MISSION WILL BE IMPLEMENTED IN PHASE TWO. INSTRUCTIONS CONCERNING THESE MATERIALS ARE FURNISHED IN PARAGRAPH 4 BELOW.
(9) ~~IN ADDITION TO THE ABOVE EXAMPLES, DPDOS WILL NOT, REPEAT NOT ACCEPT DIRT RESULTING FROM A HAZARDOUS CHEMICAL SPILL, I.E., PCB, DDT, ETC. RESIDUE SUCH AS RAGS, MOPS, ETC.~~

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~~WHEN PROPERLY CONTAINERIZED, WILL BE ACCEPTED FOR DISPOSAL BY THE DPDO.~~
G. THE DPDO CHIEF OR HIS REPRESENTATIVE WILL CONTACT THE GENERATING ACTIVITIES AND DETERMINE THE MAGNITUDE OF FUTURE TURN-INS OF HAZARDOUS MATERIAL ELIGIBLE FOR DPDO DISPOSAL AND DETERMINE WHAT WILL BE TURNED IN WITHIN THE NEXT TWO MONTHS. THIS HAZARDOUS MATERIAL INCLUDES THAT MATERIAL WHICH THE GENERATING ACTIVITY COULD NOT TURN-IN TO THE DPDO PREVIOUSLY BECAUSE OF RESTRICTIONS THAT HAVE SINCE BEEN LIFTED.
H. IF THE VOLUME OF MATERIAL WARRANTS, THE DPDO SHOULD SCHEDULE THE TURN-IN TO ALLOW FOR PROPER PROCESSING. ANY INDICATION OF A LARGE VOLUME OF HAZARDOUS MATERIAL OR MANY HAZARDOUS ITEMS SHOULD BE ELEVATED TO THE OPERATIONS DIVISION (DPDR-MR).
I. INPUT TO IDMS WILL BE BY AN XR1 AND THE MATERIAL WILL BE PROCESSED AS USABLE PROPERTY. DOWNGRADE TO SCRAP VIA XR3 AND RECEIPT OF SCRAP VIA XR2 ARE NOT ALLOWED. THIS APPLIES TO HAZARDOUS MATERIAL ONLY.
4. PHASE TWO:
A. PHASE TWO DEALS WITH THE MATERIAL THAT IS PRESENTLY BEING DISPOSED OF VIA EXISTING SERVICE CONTRACTS ADMINISTERED

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BY THE DOD COMPONENTS AND WILL NOT, REPEAT NOT BE IMPLEMENTED AT THIS TIME.

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PRIORITY * U N C L A S S I F I E D *
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B. DPDOS WILL NOT, REPEAT NOT ACCEPT RESPONSIBILITY FOR THAT PROPERTY THAT IS BEING DISPOSED OF VIA EXISTING SERVICE CONTRACT BECAUSE OF DPDS FUNDING CONSTRAINTS, TIME FACTORS INVOLVED AND BECAUSE THE MAGNITUDE OF THE EXISTING CONTRACTS IS NOT FULLY KNOWN AT THIS TIME.
C. THE DPDO WILL CONTINUE TO NOT ACCEPT ACCOUNTABILITY FOR THIS MATERIAL UNTIL FURTHER NOTICE.
D. THE DPDO CHIEFS OR REPRESENTATIVE WILL CONTACT MAJOR TURN-IN ACTIVITITES AND DETERMINE WHAT TYPES OF PROPERTY ARE PRESENTLY BEING DISPOSED OF BY THE DOD COMPONENTS AND WHICH WILL EVENTUALLY BE TURNED IN TO THE DPDO.
E. THE DPDO CHIEF OR REPRESENTATIVE WILL IDENTIFY AND RECURRING CONTRACTS, THEIR EXPIRATION DATES AND ANNUAL COST.
F. THE ABOVE INFORMATION WILL BE RELAYED TO THE OPERTIONS DIVISION (DPDR-MR) BY 1 DEC 80. THIS INFORMATION IS FOR INFORMATION PURPOSES ONLY AND IS NOT AN INDICATION THAT DPDS WILL AUTOMATICALLY ASSUME THE CONTRACT.
G. ANY INFORMATION REGARDING RECURRING CONTRACTS THAT

ARE SCHEDULED TO EXPIRE BY 31 DEC 80 SHOULD BE FORWARDED TO THE OPERATIONS DIVISION (DPDR-MR) IMMEDIATELY, BY PRIORITY MESSAGE, INFORMATION COPY TO DPDS-LPE.
H. THE DOD COMPONENTS HAVE BEEN ADVISED THAT DPDO/DPDS IS NOT ACCEPTING RESPONSIBILITY FOR THE SERVICE CONTRACT AT THIS TIME. THE DOD COMPONENTS HAVE BEEN REQUESTED TO CONTINUE THE SERVICE CONTRACT CAPABILITY UNTIL RESPONSIBILITY CAN BE ASSUMED BY DPDS/DPDO.
I. UPON REQIPT OF THE DATE REQUESTED ABOVE, THE IMPLEMENTATION OF THE SERVICE CONTRACT PORTION WILL BE FULLY DISCUSSED WITH THE DOD COMPONENTS WITH IMPLEMENTING GUIDANCE TO DPDOS.
BT
#8685

NNNN
DPDO/2CP

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PRIORITY * U N C L A S S I F I E D *
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PT 00031 304/0112Z PAGE 01

PTTUZYUW RUEBUAB9757 3031855-UUUU--RUEBDDA.
ZNR UUUUU
P 281400Z OCT 80
FM HQ DPDS BATTLE CREEK MI
TO ATG 4540
ATG 4541
ATG 4542
ATG 4543
ATG 4544 //ACT: DPDO//
RUEDFMA/DPDM EARLE//DPDM R//
INFO RUEBDSA/DLA CAM STA VA//DLA SM//
RUEBDSA/DLA CAM STA VA//DLA W//
RULSSAA/NAVFACENGCOMHQ WASH DC//CODE 112//
RUEAUSA/HQ AFOCSLOG WASH DC//DALO SMS//
RUVAAAA/AFLC WPAFB OH//LOLP//
RUEACMC/HQ USMC.WASH DC//LMM 2//
BT
UNCLAS DPDS-LPE 5201. SUBJ: IMPLEMENTATION PROCEDURES FOR RCRA HAZARDOUS WASTE MANAGEMENT REGULATIONS. REFERENCES:
A. EPA HAZARDOUS WASTE AND CONSOLIDATED PERMIT REGULATIONS, FEDERAL REGISTER, MAY 19, 1980.
B. DEQPPM 80-8, SUBJECT: RCRA HAZARDOUS WASTE MANAGEMENT

PRIORITY

PAGE 2 RUEBUAB9757 UNCLAS
REGULATIONS, DATED 21 OCT 1980.
1. REFERENCE B ESTABLISHES DOD POLICY FOR COMPLYING WITH REF A REQUIREMENTS. THIS MESSAGE SUMMARIZES KEY POINTS FOR THE MANDATORY PERMIT APPLICATIONS DUE 19 NOV 80 AND OPERATIONAL PROCEDURES THAT MUST BE IMPLEMENTED COMMENCING THAT DATE. THESE POLICIES AND PROCEDURES ARE CONSISTENT WITH THE DISPOSAL RESPONSIBILITIES ESTABLISHED IN DEQPPM 80-5. SOME STATES MAY HAVE ADDITIONAL REQUIREMENTS WHICH ALSO MUST BE MET. THE RESPONSIBILITY CONCEPT OUTLINED IN THIS MESSAGE WILL APPLY TO THESE ADDITIONAL REQUIREMENTS.
2. THE INSTALLATION COMMANDER FOR ANY DOD INSTALLATION WHICH OWNS OR OPERATES AN EXISTING FACILITY THAT TREATS, STORES OR DISPOSES (TSD) OF HAZARDOUS WASTES WILL APPLY FOR ONE PERMIT FROM EPA OR THE STATE BY PREPARING AND SUBMITTING ONE EPA FORM 3510-1, HAZARDOUS WASTE PERMIT APPLICATION." THE EPA FORM 3510-1 WILL BE SUPPORTED BY A PROPERLY PREPARED EPA FORM 3510-3 FOR EACH EXISTING TSD FACILITY ON THAT INSTALLATION. THE INSTALLATION COMMANDER WILL PROVIDE BLANK 3510-3 FORMS TO ALL TSD FACILITIES.
A. THE EPA FORM 3510-1 WILL BE PREPARED IN ACCORDANCE WITH ESTABLISHED INSTRUCTIONS AND SIGNED BY THE INSTALLATION COMMANDER. BLOCK VIII OPERATOR INFORMATION WILL BE FILLED OUT TO STATE "MULTIPLE-

PAGE 3 RUEBUAB9757 UNCLAS
SEE ATTACHED (ENTER TOTAL NUMBER) EPA FORMS 3510-3."
B. EACH EPA FORM 3510-3 WILL BE PREPARED IN ACCORDANCE WITH ESTAB-

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PRIORITY * U N C L A S S I F I E D *
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PRIORITY
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* U N C L A S S I F I E D *
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LISHED INSTRUCTIONS AND SIGNED BY THE INSTALLATION COMMANDER AS "OWNER" AND BY THE OFFICER IN CHARGE OF THE SPECIFIC TSD FACILITY AS "OPERATOR." BLOCK III "NAME OF FACILITY" OF THE EPA FORM 3510-1 WILL BE REPRODUCED, USED TO IDENTIFY THE PERTINENT INFORMATION RELATIVE TO EACH TSD FACILITY, AND ATTACHED TO EACH EPA FORM 3510-3. TENANT ORGANIZATIONS WILL BE RESPONSIBLE FOR COMPLETING THE EPA FORM 3510-3 AND PROVIDING IT TO THE INSTALLATION COMMANDER. IN SOME CASES, A TENANT ORGANIZATION, SUCH AS A DPDO, MAY STORE, TREAT, OR DISPOSE OF HAZARDOUS WASTE FROM OTHER DOD OFF-BASE GENERATORS. THE TENANT ACTIVITY IS RESPONSIBLE FOR CONTACTING EACH OF THE GENERATORS SERVICED TO INSURE THAT PART IV, "DESCRIPTION OF HAZARDOUS WASTE," OF THE EPA FORM 3510-3 IDENTIFIES ALL TYPES OF HAZARDOUS WASTES TREATED, STORED OR DISPOSED. EACH INSTALLATION INCLUDING OFF-BASE GENERATORS WILL INSURE THAT THOSE HAZARDOUS WASTES WHICH WERE IDENTIFIED ON THE INITIAL NOTIFICATION FORM AND THAT WILL ALSO BE TRANSFERRED TO THE DPDO ARE INCLUDED ON THE DPDO PREPARED 3510-3. THE PROPERTY PREPARED EPA FORM 3510-3 MUST BE PROVIDED TO THE INSTALLATION COMMANDER BY THE DATE SPECIFIED BY

PAGE 4 RUEBUA9757 UNCLAS
THE INSTALLATION COMMANDER IN ORDER TO MEET THE EPA REQUIREMENTS FOR APPLICATION BY 19 NOV 80.
3. THE INSTALLATION COMMANDER IS RESPONSIBLE FOR DEVELOPING AND IMPLEMENTING A HAZARDOUS WASTE MANAGEMENT PLAN TO INCLUDE ALL TENANTS ON HIS INSTALLATION. THIS PLAN SHALL IDENTIFY AND IMPLEMENT ALL HAZARDOUS WASTE MANAGEMENT ACTIONS REQUIRED BY RCRA. ALL TENANTS WILL COMPLY WITH APPLICABLE PORTIONS OF THE HAZARDOUS WASTE MANAGEMENT PLAN. INTERNAL OPERATIONAL PROCEDURES WILL BE CONSISTENT WITH THE HAZARDOUS WASTE MANAGEMENT PLAN.
4. ALL TENANTS WILL INSURE REQUIRED INSPECTIONS AND RECORDKEEPING ACTIONS, AS OUTLINED BY THE HAZARDOUS WASTE MANAGEMENT PLAN, ARE ACCOMPLISHED FOR HAZARDOUS WASTES FOR WHICH THE TENANT HAS ACCOUNTABILITY. REQUIRED SUPPORT AS AVAILABLE WILL PROVIDE BY THE HOST ACTIVITY. ARRANGEMENTS FOR REIMBURSEMENT WILL BE REQUESTED THROUGH NORMAL COMMAND CHANNELS.
5. INSTRUCTIONS ON MANIFESTING HAZARDOUS WASTE SHIPMENTS WILL BE FURNISHED AT A LATER DATE.
BT
#9757

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DPDO/2CP

PRIORITY
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ROUTINE * U N C L A S S I F I E D *
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PT 00308 309/2210Z PAGE 01

RTTUZYUW RUCLETA8825 3092123-UUUU--RUEBDOA.
ZNR UUUUU
R 042000Z NOV 80
FM DPDR COMDR MEMPHIS TN
TO ATG 4544//ACT: DPDO//
BT
UNCLAS DPDR-MR 376-80. PASS TO DEFENSE PROPERTY DISPOSAL OFFICE.
SUBJECT: POLICY GUIDANCE
1. REFERENCE DPDR-MR MESSAGE 374-80, DTG 291930Z OCT 80, SUBJECT AS ABOVE.
2. EXAMPLE #2: MAINTENANCE OPERATION, IS DELETED FROM PARA 2.F. OF REFERENCED MESSAGE. SOLVENT FROM THIS PROCESS WILL BE ACCEPTED BY THE DPDO FOR DISPOSITION.
3. DELETE THE FIRST SENTENCE OF PARA 2.F.(9).
BT
#8825

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DPDO //25

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ROUTINE * U N C L A S S I F I E D *
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OPNAV 5216/144 (REV. 6-70)
S/N 0107-LF-778-8099

DEPARTMENT OF THE NAVY

Memorandum

DATE: 18 Aug 1980

FROM Director, Natural Resources and Envirnmental Affairs Division

TO Base Maintenance Officer

Via: Director, M&R Division

SUBJ PCB Transformers, PCB Contaminated Transformers and PCB's stored in Drums; EPA storage, marking and handling requirements

Ref: (a) OPNAVINST 6240.3E of 5 July 1977
(b) Toxic Substances Control Act

Encl: (1) LANTDIV Notice 6280 of 2 July 1980
(2) Summary Sheet of Transformers, Voltage Regulators and Transformer Oils in Storage at Lot 140, MCBCLNC; awaiting disposal

1. Reference (a) implements EPA regulations promulgated under reference (b) regarding the subject equipment and materials. Enclosure (1) provides a summary of current information and guidance on PCB management.

2. Data contained in enclosure (2) and appendices (a) and (b) thereof, provide necessary information for determining actions required to comply with reference (a) and (b) and enclosure (1) in regard to the subject items.

3. Present storage facilities at Lot 140 are inadequate and do not comply with EPA regulations contained in enclosure (1).

4. Transformers listed in Item 4 of Part I and Part 2 of enclosure (2) should be immediately marked with the "Large PCB Mark" as shown in enclosure (1). Transformers and barrels of transformer oil listed in parts 3 and 5 of Part 1 of enclosure (2) should be immediately marked with the following:

CAUTION CONTAINS LIQUIDS CONTAMINATED WITH POLYCHLORINATED BIPHENYLS (PCB's) IN CONCENTRATIONS OF 50-499 PPM

A yellow durable sticker with black letters is recommended.

Julian I. Wooten

JULIAN I. WOOTEN

ROUTING SLIP

DEC 1 5 1980

	ACTION	INFO	INITIAL
BMO		✓	
ABMO		✓	
ADMIN		✓	
ENVIRON AFF	✓	✓	
F&A BRANCH			
MAINT NCO			
M&R			
OPNS		✓	
PROP			
TELE			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

File
Mat
Hq
DDS

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

IN REPLY REFER TO

FAC:JAM:mkc
11100
12 DEC 1980

From: Commanding General
To: Commanding General, 2d Force Service Support Group (Rein), FMF, Atlantic

Subj: Utilization of Hazardous and Flammable Storehouse, Building TP-451

Ref: (a) Resource Conservation and Recovery Act, 1976 (NOTAL)
(b) Environmental Protection Agency Regulations 40CFR 260-265 (NOTAL)
(c) National Environmental Policy Act, 1969 (NOTAL)
(d) MCBul 6280 of 9 Sep 1980
(e) MCO P11000.5E

1. The hazardous materials and flammable storehouse, TP-457, was an exigent minor construction project completed in September 1980 to support the mission of 2d Supply Battalion, 2d Force Service Support Group (Rein). This building replaced Building TP-452, which was destroyed by fire during October 1977. Building TP-451 was selected as an interim facility. Both TP-452 and TP-451 were identified as inadequate facilities for the battalion because issue hazardous and flammable materials had to be stored unprotected and could not be readily moved from receiving areas and unsafe temporary storage locations. Building TP-451 was vacated by Supply Battalion during October 1980 and is now required by Marine Corps Base for storage of hazardous materials and wastes.

2. References (a) through (d) establish the requirements for the Camp Lejeune complex to store specific hazardous materials and wastes prior to their disposal. This requirement became effective on 19 November 1980. These materials can be stored 90 days without an Environmental Protection Agency approved or interim approved structure. After 90 days, they must be transported to a disposal facility. Since there are no DoD disposal facilities for some materials, e.g., transformer coolants with over 500 parts per million of PCB, a storage facility is necessary. Therefore, a proper storage facility must be available for use by 19 February 1981.

3. During September 1980, a survey was made of all buildings capable of meeting the structural and location criteria of Section 265 of reference (b). Building TP-451 was identified as the most suitable because:

a. The building and immediate area are an existing storage site for hazardous materials precluding conflict with references (c) and (d).

b. Reference (b) permitted only interim storage facilities to receive authorization under the "interim status provisions."

c. Site requirements limited alternatives to locations sufficiently remote from surrounding populations to minimize the impact on public health and safety.

d. The site is in proximity to present Defense Property Disposal Facilities.

e. 2d Supply Battalion, 2d FSSG was scheduled to vacate the building and move into the new storehouse building.

f. A minor construction project could render the building capable of meeting the minimum storehouse facility requirement outlined in references (b) through (d).

4. During September 1980, the Facility Officer, 2d FSSG was notified of Marine Corps Base's facility requirements, as well as the probable necessity of the building's use by Marine Corps Base. At that time, the facilities requirements of the 2d FSSG Motor Transport Field Skills Training (FST) School and Central Administrative Vehicle (CAV) units were raised. Specifically, it was noted that 2d FSSG was desirous of using the hazardous and flammable storehouse as a maintenance facility for the MT FST School and the CAV after it was vacated by the 2d Supply Battalion. Minor construction projects to fulfill the facility requirements of the two units were also under consideration for possible inclusion in the 2d FSSG Minor Construction Program. The Facilities Officer, 2d FSSG was advised that a change in the building's use after it was vacated by Supply Battalion would have to be specifically requested; however, temporary use of the building as a maintenance facility was verbally authorized on 19 September 1980 for a period of 60 - 90 days pending a final decision by Marine Corps Base on its hazardous material and waste storage alternatives.

5. Since there is no viable economic alternative at this time, Building TP-451 will have to be upgraded and utilized by MCB as a hazardous materials and waste storage facility. On 31 October 1980, the Commanding General, MCB submitted an application to the Environmental Protection Agency for interim status to enable the Base to store these materials. In order to complete necessary modifications to the building by 19 February 1981, MT FST School and CAV maintenance personnel will have to vacate the storage facility prior to 1 January 1981.

6. The long-range solution for the two 2d FSSG units will be fulfilled by a Headquarters Marine Corps approved and programmed motor transport/organizational maintenance facility for each separate battalion. These are due to be completed by FY 87. There are no HQMC approved requirements for the FST School or the CAV unit, per se, therefore, no Basic Facilities Requirements List exists for their function.

7. Use of minor construction monies to fulfill some of the facility requirements of 2d FSSG has been reviewed. Reference (e) specifically prohibits use of minor construction monies to fulfill those requirements that are approved by HQMC and are planned for funding via an MCON project.

8. As for interim facilities for the MT FST School and CAV units, there are two legitimate alternatives available.

FAC:JAM:mkc
11100

a. That the two units continue to function separately from their battalion motor transport maintenance and operations sections in their existing locale.

b. That accommodations be made within the existing motor transportation facilities of 2d FSSG separate battalions to provide minimal facility requirements for the two units.

9. A mid-range solution to the problem may be the utilization of Buildings 1205 and 1206 in the Industrial Area. Currently utilized by the 2d Marine Regiment as a motor pool and maintenance area, the 42,902 sq. ft. of building space will become available during FY-83. Additionally, it is possible that a II MAF FST MT School may become operational at Camp Lejeune by the end of FY-81, thus obviating the necessity for a 2d FSSG MT FST School.

10. Point of contact for further information is Major J. A. MARAPOTI, office of the Assistant Chief of Staff, Facilities, Marine Corps Base, extensions 3034/2544.

K. P. Millice, Jr.

K. P. MILLICE, Jr.
By direction

Copy to:
BMO
PWO
DPDO

MAIN/DS/mp
6240
DEC 9 19

From: Base Maintenance Officer
To: Base Motor Transport Officer

Subj: State Hazardous Waste Regulations; requirements of

Ref: (a) FONECON btwn Mr. Barto, Base Motor Transport, and Mr. Danny Sharpe BMainDept of 5 Dec 1980
(b) North Carolina Department of Human Resources (O. W. Strickland) ltr of 1 Nov 1980
(c) Resource Conservation and Recovery Act of 1976 (NOTAL)
(d) Marine Corps Base 192111Z Nov 1980

Encl: (1) Environmental Protection Agency Regulations for Hazardous Waste Transporters 40 CFR part 263

1. This letter is to confirm information provided during reference (a) regarding state hazardous waste regulations outlined in reference (b) and related federal regulations outlined in enclosure (1), which were developed by Environmental Protection Agency (EPA) to implement reference (c). Reference (d) also pertains.

2. This office has prepared and submitted the required notifications and permit applications to the Environmental Protection Agency which are discussed in paragrpph (2) of reference (b).

3. Point of contact with this matter is Mr. Danny Sharpe, Base Maintenance Department, telephone 5003, 2083, or 2195.

J. I. WOOTEN
By direction

ENVIRONMENTAL PROTECTION AGENCY REGULATIONS FOR HAZARDOUS WASTE TRANSPORTERS

(40 CFR 263; 45 FR 12743, February 26, 1980, Effective August 26, 1980; Revised by 45 FR 33151, May 19, 1980, Effective November 19, 1980)

[*Editor's note:* In a separate notice, EPA February 26, 1980, published a notification form for use by generators, transporters, and operators engaged in hazardous waste activities (45 FR 12746). That form is published with the regulations for generators, page 161:1901.]

New Parts 122, 123, and 124, EPA's consolidated permit program regulations, are published in Environmental Reporter — Federal Regulations — 1, at 101:0701, 101:0751, and 101:0801, respectively.

PART 263—STANDARDS APPLICABLE TO TRANSPORTERS OF HAZARDOUS WASTE

Subpart A—General

Sec.
263.10 Scope.
263.11 EPA Identification Numbers.

Subpart B—Compliance With the Manifest System and Recordkeeping

263.20 The Manifest System.
263.21 Compliance with the Manifest.
263.22 Recordkeeping.

Subpart C—Hazardous Waste Discharges

263.30 Immediate Action.
263.31 Discharge Clean Up.

Authority: Sec. 2002(a), 3002, 3003, 3004 and 3005 of the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act of 1976 and as amended by the Quiet Communities Act of 1978, (42 U.S.C. 6912, 6922, 6923, 6924, 6925).

Subpart A—General

§ 263.10 Scope.

(a) These regulations establish standards which apply to persons transporting hazardous waste within the United States if the transportation requires a manifest under 40 CFR Part 262.

Note.—The regulations set forth in Parts 262 and 263 establish the responsibilities of generators and transporters of hazardous waste in the handling, transportation, and management of that waste. In these regulations, EPA has expressly adopted certain regulations of the Department of Transportation (DOT) governing the transportation of hazardous materials. These regulations concern, among other things, labeling, marking, placarding, using proper containers, and reporting discharges. EPA has expressly adopted these regulations in order to satisfy its statutory obligation to promulgate regulations which are necessary to protect human health and the environment in the transportation of hazardous waste. EPA's adoption of these DOT regulations ensures consistency with the requirements of DOT and thus avoids the establishment of duplicative or conflicting requirements with respect to these matters. These EPA regulations which apply to both interstate and intrastate transportation of hazardous waste are enforceable by EPA.

DOT has revised its hazardous materials transportation regulations in order to encompass the transportation of hazardous waste and to regulate intrastate, as well as interstate, transportation of hazardous waste. Transporters of hazardous waste are cautioned that DOT's regulations are fully applicable to their activities and enforceable by DOT. These DOT regulations are codified in Title 49, Code of Federal Regulations, Subchapter C.

EPA and DOT worked together to develop standards for transporters of hazardous waste in order to avoid conflicting requirements. Except for transporters of bulk shipments of hazardous waste by water, a transporter who meets all applicable requirements of 49 CFR Parts 171 through 179 and the requirements of 40 CFR sections 263.11 and 263.31 will be deemed in compliance with this Part. Regardless of DOT's action, EPA retains its authority to enforce these regulations.

(b) These regulations do not apply to on-site transportation of hazardous waste by generators or by owners or operators of permitted hazardous waste management facilities.

(c) A transporter of hazardous waste must also comply with 40 CFR Part 262, Standards Applicable to Generators of Hazardous Waste, if he:

(1) Transports hazardous waste into the United States from abroad; or

(2) Mixes hazardous wastes of different DOT shipping descriptions by placing them into a single container.

Note.—Transporters who store hazardous waste are required to comply with the storage standards in 40 CFR Parts 264 and 265 and the permit requirements of 40 CFR Part 122.

§ 263.11 EPA identification number.

(a) A transporter must not transport hazardous wastes without having received an EPA identification number from the Administrator.

(b) A transporter who has not received an EPA identification number may obtain one by applying to the Administrator using EPA Form 8700-12. Upon receiving the request, the Administrator will assign an EPA identification number to the transporter.

Subpart B—Compliance With the Manifest System and Recordkeeping

§ 263.20 The manifest system.

(a) A transporter may not accept hazardous waste from a generator unless it is accompanied by a manifest, signed by the generator in accordance with the provisions of 40 CFR Part 262.

(b) Before transporting the hazardous waste, the transporter must sign and date the manifest acknowledging acceptance of the hazardous waste from the generator. The transporter must return a signed copy to the generator before leaving the generator's property.

(c) The transporter must ensure that the manifest accompanies the hazardous waste.

(d) A transporter who delivers a hazardous waste to another transporter or to the designated facility must:

(1) Obtain the date of delivery and the handwritten signature of that transporter or of the owner or operator of the designated facility on the manifest; and

(2) Retain one copy of the manifest in accordance with § 263.22; and

(3) give the remaining copies of the manifest to the accepting transporter or designated facility.

(e) The requirements of paragraphs (c) and (d) of this section do not apply to rail or water (bulk shipment) transporters if:

(1) The hazardous waste is delivered by rail or water (bulk shipment) to the designated facility; and

(2) A shipping paper containing all the information required on the manifest (excluding the EPA identification numbers, generator certification, and signatures) accompanies the hazardous waste; and

[Sec. 263.20(e)(2)]

Enclosure 1

(3) The delivering transporter obtains the date of delivery and handwritten signature of the owner or operator of the designated facility on either the manifest or the shipping paper; and

(4) The person delivering the hazardous waste to the initial rail or water (bulk shipment) transporter obtains the date of delivery and signature of the rail or water (bulk shipment) transporter on the manifest and forwards it to the designated facility: and

(5) A copy of the shipping paper or manifest is retained by each rail or water (bulk shipment) transporter in accordance with § 263.22.

(f) Transporters who transport hazardous waste out of the United States must:

(1) indicate on the manifest the date the hazardous waste left the United States; and

(2) sign the manifest and retain one copy in accordance with § 263.22(c); and

(3) return a signed copy of the manifest to the generator.

§ 263.21 Compliance with the manifest.

(a) The transporter must deliver the entire quantity of hazardous waste which he has accepted from a generator or a transporter to:

(1) The designated facility listed on the manifest; or

(2) The alternate designated facility, if the hazardous waste cannot be delivered to the designated facility because an emergency prevents delivery; or

(3) The next designated transporter; or

(4) The place outside the United States designated by the generator.

(b) If the hazardous waste cannot be delivered in accordance with paragraph (a) of this section, the transporter must contact the generator for further directions and must revise the manifest according to the generator's instructions.

§ 263.22 Recordkeeping.

(a) A transporter of hazardous waste must keep a copy of the manifest signed by the generator, himself, and the next designated transporter or the owner or operator of the designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter.

(b) For shipments delivered to the designated facility by rail or water (bulk shipment), each rail or water (bulk shipment) transporter must retain a copy of a shipping paper containing all the information required in § 263.20(e)(2) for a period of three years from the date the hazardous waste was accepted by the initial transporter.

(c) A transporter who transports hazardous waste out of the United States must keep a copy of the manifest indicating that the hazardous waste left the United States for a period of three years from the date the hazardous waste was accepted by the initial transporter.

(d) The periods of retention referred to in this Section are extended automatically during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator.

Subpart C—Hazardous Waste Discharges

§ 263.30 Immediate action.

(a) In the event of a discharge of hazardous waste during transportation, the transporter must take appropriate immediate action to protect human health and the environment (e.g., notify local authorities, dike the discharge area).

(b) If a discharge of hazardous waste occurs during transportation and an official (State or local government or a Federal Agency) acting within the scope of his official responsibilities determines that immediate removal of the waste is necessary to protect human health or the environment, that official may authorize the removal of the waste by transporters who do not have EPA identification numbers and without the preparation of a manifest.

(c) An air, rail, highway, or water transporter who has discharged hazardous waste must:

(1) Give notice, if required by 49 CFR 171.15, to the National Response Center (800–424–8802 or 202–426–2675); and

(2) Report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, D.C. 20590.

(d) A water (bulk shipment) transporter who has discharged hazardous waste must give the same notice as required by 33 CFR 153.203 for oil and hazardous substances.

§ 263.31 Discharge clean up.

A transporter must clean up any hazardous waste discharge that occurs during transportation or take such action as may be required or approved by Federal, State, or local officials so that the hazardous waste discharge no longer presents a hazard to human health or the environment.

DISTRIBUTION MAIN
BMO
ABMO
NREAD (File)
Admin D.
Oper D.
M&P D.
Tele D.
Int D.
F&A O.
Prop O.
MME
Maint NCO
Secretary

TOD/ICP
24/1725ZNOV80

DCAH-13

RTTUZYUW RUEBDOA8655 3251150-UUUU--RUEACMC.
ZNR UUUUU
R 241439Z NOV 80
FM CG MCB CAMP LEJEUNE NC
TO CMC WASHINGTON DC
BT
UNCLAS //N06240//
FOR CODE LFF-2
SUBJ: FUNDING OF DEVELOPMENT OF SANITARY LANDFILL OPERATIONAL PLAN; REQUEST FOR
A. NC SOLID WASTE MANAGEMENT RULE
B. BASE CDR MCB CLNC LTR PWO:04:TRA:HFF 11000 OF 29 AUG 1980
C. CMC 231510Z JUN 1980
D. FONECON BTWN MR. B. W. ELSTON (BMAINTDEPT, CAMP LEJEUNE NC) AND MR. R. WHEATON (CMC CODE LFF-2) ON 13 NOV 1980
1. REF A REQUIRES A PERMIT FROM THE NC DIVISION OF HEALTH SERVICES TO OPERATE SANITARY LANDFILLS. SITE APPROVAL AND DEVELOPMENT OF AN APPROVED OPERATIONAL PLAN REQUIRED PRIOR TO ISSUANCE OF PERMIT. SITE APPROVAL HAS BEEN OBTAINED. HOWEVER, PROPOSED OPERATIONAL PLANS SUBMITTED BY THIS COMMAND WERE RETURNED ON 19 NOV 1979 FOR REVISION AND RESUBMISSION. RECOMMENDED REVISION REQUIRED ENGINEERING EXPERTISE BEYOND LOCAL CAPABILITIES. SUBSEQUENTLY

PAGE 02 RUEBDOA8655 UNCLAS
AN FY 81 BUDGET DEFICIENCY, IN AMT $20,000 WAS SUBMITTED FOR CONTRACT PREPARATION OF REVISED PLAN. ADDITIONALLY REF B IDENTIFIED SANITARY LANDFILL OPERATIONAL PLAN AS HIGH INTEREST ENVIRONMENTAL PROJECT FOR HIGH PRIORITY POM 83 INITIATIVE IN RESPONSE TO REF C.
2. RECENT CONVERSATIONS WITH STATE PERSONNEL INDICATED FORMAL INSPECTIONS WOULD BEGIN AS EARLY AS DEC 1980. STATE PERSONNEL WERE CONCERNED WITH THE AMOUNT OF PROGRESS MADE TOWARD REVISION OF SUBJECT PLAN. AS DISCUSSED DURING REF D, REQUEST $20,000 BE MADE AVAILABLE FOR THIS PROJECT AS SOON AS POSSIBLE.
BT
#8655
TOD: 241725Z NOV 80/13
REL: K P MILLICE, JR. FAC
DIST: MAIN, FAC, COMP, PWO

NNNN

File - Hq Mat

JOINT MESSAGEFO

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE	TIME RELEASED/TIME	MONTH	YR	PRECEDENCE ACT	PRECEDENCE INFO	CLASS	SPECAT	LMF	CIC	ORIG/MSG IDENT
01 06				PP	PP	UUUU				3241600

MESSAGE HANDLING INSTRUCTIONS

FROM: CG MCB CAMP LEJEUNE NC

TO: CG SECOND MARDIV
CG SECOND FSSG
MCB CAMP LEJEUNE NC
MCAS H NEW RIVER NC
DPDO CAMP LEJEUNE NC
NAVREGMEDCEN CAMP LEJEUNE NC
NAVREGDENCEN CAMP LEJEUNE NC

UNCLAS //N06280//

SUBJ: RESOURCE CONSERVATION AND RECOVERY ACT IMPLEMENTATION

1. THE FOLLOWING INFORMATION AND IMPLEMENTATION IS PROVIDED AS AN INTERIM MEASURE UNTIL A FORMAL IMPLEMENTING INSTRUCTION CAN BE PROMULGATED.

2. ON 19 NOV 1980, REGULATIONS IMPLEMENTING THE SUBJ ACT GO INTO EFFECT WHICH PLACE STRINGENT LEGAL REQUIREMENTS ON THE TRANSPORTATION LONG TERM STORAGE AND DISPOSAL OF HAZARDOUS WASTES. ADDRESSEES ARE CAUTIONED THAT SEVERE FINES AND PENALTIES MAY RESULT FROM ILLEGAL TRANSPORTATION AND DISPOSAL OF HAZARDOUS WASTES. INDIVIDUALS

MAIN|FAC|LOG

J. WOOTEN, NREA, 5003, 18NOV80

SPECIAL INSTRUCTIONS

AC/S FAC ----- AC/S LOG -----

2D FSSG ----- DPDO -----

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE TIME GROUP

DD 173/2 (OCR) PREVIOUS EDITION IS OBSOLETE

S/N 0102-LF-002-1752 GPO: 1979 — 302-175

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

PRECEDENCE	CLASS	SPECAT	CMP	CIC	ORIG MSG IDENT
02 06 PP PP	UUUU				3241600

MESSAGE HANDLING INSTRUCTIONS

INVOLVED IN THE VIOLATION OF SUBJ LAW MAY BE PERSONALLY LIABLE DEPENDING ON THE SPECIFIC CIRCUMSTANCES OF THE VIOLATION. THE FOLLOWING ACTIVITIES WILL BE PROHIBITED AND SUBJ TO PROSECUTION IN BOTH FEDERAL AND STATE COURTS DEPENDING ON THE NATURE OF THE VIOLATION.

A. TRANSPORTATION OF HAZARDOUS WASTES ON PUBLIC HIGHWAYS WITHOUT PROPER SHIPPING MANIFESTS MEETING ENVIRONMENTAL PROTECTION AGENCY (EPA) REQ.

B. DISPOSAL OR OTHERWISE DISCHARGING HAZARDOUS WASTES AND MATERIALS ON OR INTO THE LAND, WATERS AND ATMOSPHERE WITHOUT PROPER EPA AND STATE PERMITS.

C. STORAGE OF HAZARDOUS WASTES FOR OVER NINETY DAYS WITHOUT PROPER EPA AND STATE PERMITS.

D. MIXING OF REGULATED HAZARDOUS WASTES WITH USED OIL BEING COLLECTED AND RECYCLED AS USED PETROLEUM PRODUCTS. MIXING SUCH WASTES WITH USED OIL WOULD REQUIRE DISPOSAL OF THE ENTIRE MIXTURE AS A HAZARDOUS WASTE AND WOULD TREMENDOUSLY INCREASE COSTS.

E. FAILURE TO MAINTAIN PROPER RECORDS AND SUBMIT REQUIRED REPORTS TO EPA AND STATE REGULATORY AGENCIES.

SPECIAL DISTRIBUTION

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE TIME GROUP

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

PAGE	DTG RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	CIC	ORIG MSG IDENT
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BUOR | MESSAGE HANDLING INSTRUCTIONS

FROM:
TO:

3. ACTIVITIES WHICH GENERATE HAZARDOUS WASTES REGULATED BY THE SUBJ LAW WERE REQ TO SO INFORM EPA BY 17 AUG 1980. THIS COMMAND MADE THE REQUIRED NOTIFICATION AND INCLUDED ALL KNOWN HAZARDOUS WASTE ACTIVITY OF BASE TENANTS.

4. ALL TRANSPORTATION ON PUBLIC HIGHWAYS AND DISPOSAL OF HAZARDOUS WASTE GENERATED ABOARD CAMP LEJEUNE MUST BE DOCUMENTED UNDER AN INDENTIFICATION NUMBER ASSIGNED BY EPA TO THIS COMMAND. VEHICLES ON PUBLIC HIGHWAYS APPEAR TO BE UNDER THE JURISDICTION OF THE STATE LAW.

5. ADDRESSEES ARE ADVISED THAT MARINE CORPS BASE HAS RESPONSIBILITY FOR LONG TERM STORAGE AND DISPOSAL OF HAZARDOUS WASTES THROUGH A PROGRAM BEING DEVELOPED IN COOPERATION WITH DEFENSE PROPERTY DISPOSAL (DPDO). MARINE CORPS BASE HAS SUBMITTED REQUIRED APPLICATIONS TO EPA FOR STORAGE OF HAZARDOUS WASTES ABOARD THE BASE. THESE FACILITIES WILL ALSO BE AVAILABLE FOR STORAGE OF WASTES AWAITING DISPOSAL WHICH ARE GENERATED ABOARD MCAS H NEW RIVER, AND OUTLYING FIELD, OAK GROVE. WASTES WILL BE ACCEPTED ONLY IF GENERATING ACTIVITIES TAKE ACTION REQUIRED TO PROPERLY SOUCE SEPARATE, CONTAINERIZE, IDENTIFY AND LABEL

FOR

SPECIAL INSTRUCTIONS

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE TIME GROUP

DD 173/2 (OCR) PREVIOUS EDITION IS OBSOLETE

GPO: 1979 — 302-176

JOINT MESSAGEFO

SECURITY CLASSIFICATION
UNCLASSIFIED

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DATE TIME	MONTH	TOR	ACT	INFO					
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MESSAGE HANDLING INSTRUCTIONS

WASTES. SOURCE SEPARATION REFERS TO SEGREGATING AND CONTAINERIZING WASTES BY TYPE AND CHARACTERISTICS AS REQUIRED TO FACILITATE RECYCLING AND DISPOSAL. MCO 4570.24, MCO P11000.8A AND MCBUL 6280 OF 1 MAY 1980 PROVIDE MARINE CORPS POLICY APPLICABE TO MANAGEMENT OF HAZARDOUS WASTES AND DEFINES HAZARDOUS MATERIALS/WASTES. ADDRESSEES ARE REQUESTED TO RESTRICT AUTHORITY FOR DISPOSAL OF HAZARDOUS MATERIALS AS REQUIRED TO ENSURE THAT HAZARDOUS MATERIALS ARE NOT IMPROPERLY DISPOSED OF AS HAZARDOUS WASTES THEREBY REDUCING REUSE AND RECYCLING AND INCREASING DISPOSAL COSTS.

6. EACH MAJOR COMMAND IS REQUESTED TO APPOINT A HAZARDOUS MATERIAL DISPOSAL COORDINATOR AS A POINT OF CONTACT TO ASSIST BASE WITH THE IMPLEMENTATION OF THE LOCAL IMPLEMENTING ORDERS AND GUIDELINES.

7. DEPARTMENT OF DEFENSE POLICY AS OUTLINED IN MCO 4570.24 PROHIBITS THE DISPOSAL OF ANY HAZARDOUS MATERIAL AS A HAZARDOUS WASTE UNTIL AVENUES OF REUSE BY THE GENERATING ACTIVITY ARE UTILIZED AND THE DEFENSE PROPERTY DISPOSAL OFFICER (DPDO) HAS PURSUED ALL AVAILABLE MEANS TO SELL, DONATE OR NEGOTIATE DISPOSAL CONTRACT FOR REUSE OR RECYCLING.

SPECIAL INSTRUCTIONS

SECURITY CLASSIFICATION
UNCLASSIFIED

DATE TIME GROUP

DD 1732 (OCR) PREVIOUS EDITION IS OBSOLETE GPO: 1979 — 302-176

JOINT MESSAGEFORM

SECURITY CLASSIFICATION: UNCLASSIFIED

PAGE	DTG RELEASER TIME			PRECEDENCE		CLASS	SPECAT	LMF	CIC	ORIG/MSG IDENT
	DATE TIME	MONTH	YR	ACT	INFO					
05 OF 06				PP	PP	UUUU				3241600

BOOK

MESSAGE HANDLING INSTRUCTIONS

8. THE FOLLOWING PROCEDURES WILL BE FOLLOWED WHEN AN ORGANIZATION WHICH HAS PHYSICAL CUSTODY OF A HAZARDOUS MATERIAL DETERMINES THAT IT NO LONGER REQUIRES THIS MATERIAL.

A. NOTIFY PRESERVATION PACKAGING AND PACKING. REP OF PP&P WILL COME TO THE ORGANIZATION AND ENSURE THAT THE MATERIAL IS PROPERLY IDENTIFIED, LABELED AND CONTAINERIZED (CERTIFICATION). UNITS MUST PROVIDE SAFE CUSTODY OF THESE MATERIALS IN CONTAINERS AT LEAST OF A SIZE IN WHICH THE MATERIAL WAS ORIGINALLY PROCURRED AND USING THE ORIGINAL CONTAINER, IF POSSIBLE.

B. SUBMIT FORM DD-1348-1 TO DPDO. DPDO WILL SEND A REPRESENTATIVE TO THE UNIT FOR VISUAL VERIFICATION.

C. THE HOLDING ORGANIZATION WILL THEN HOLD THE MATERIAL UNTIL NOTIFIED BY DPDO FOR TURN-IN. UPON RECEIPT OF TURN-IN NOTIFICATION, THE HOLDING ORGANIZATION WILL NOTIFY THE BASE TRANSPORTATION MANAGEMENT OFFICER WHO WILL ARRANGE TRANSPORTATION OF THE HAZARDOUS MATERIAL TO A LOCATION SPECIFIED BY THE DPDO.

9. ADDRESSEES ARE REQUESTED TO USE CAUTION IN IMPLEMENTING THIS MSG AND SUBSEQUENT GUIDANCE TO AVOID OVER-REACTION AND UNINTENTION-

DISTR

SPECIAL INSTRUCTIONS

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE TIME GROUP

DD 173/2 (OCR) PREVIOUS EDITION IS OBSOLETE

GPO: 1979 — 302-176

JOINT MESSAGEFORM

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	DATE TIME	MONTH	YR	ACT	INFO					
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MESSAGE HANDLING INSTRUCTIONS

ALLY ENCOURAGING IMPROPER DISPOSAL OF HAZARDOUS MATERIAL.

10. POINT OF CONTACT CONCERNING IMPLEMENTATION OF THESE INSTRUCTIONS IS MR. D. SHARPE, BASE MAINTENANCE DEPARTMENT, MCB, CAMP LEJEUNE, NC, 5003.

11. REQ WIDEST DISSEMINATION OF THIS MESSAGE.

DISTR

SPECIAL INSTRUCTIONS

RELEASER

SECURITY CLASSIFICATION: UNCLASSIFIED

DATE TIME GROUP

DD 173/2 (OCR) PREVIOUS EDITION IS OBSOLETE GPO: 1979

MAIN/JIW/ab
6240
14 November 1980

Director, Natural Resources Environmental Affairs Division

Base Maintenance Officer

Maintenance Program for Oil and Other Pollution Abatement Facilities; requirements for

REF: (a) Meeting btwn Mr. Percy Huffman, Mr. Mack Davis, and Mr. Danny Sharpe, BMaintDept of 7 Oct 80
(b) Clean Water Act and related NPDES Permit

1. The need for the subject program and the impact on base sewage treatment plants was discussed during reference (a). The subject facilities existing and under construction by MilCon P996 and other projects for new maintenance facilities, if not properly maintained will discharge significant quantities of oils, solvents, and other materials into the sanitary system. It is the judgement of utilities personnel that such discharges would seriously damage the biological and physical capacity of the plants to treat wastes and would result in serious violations of reference (b). This office concurs in this determination.

2. Accordingly, it is recommended that action be initiated by Directors of Utilities Division, Maintenance and Repair Division, and Operations Division of Base Maintenance Department, to evaluate the capability of Base Maintenance Department to maintain these facilities. If such a review indicates significant deficiencies, it is recommended that action and upchannel correspondence be initiated for correction of the deficiency. In addition, it is recommended that responsibilities for maintenance of subject facilities be clarified.

J. I. WOOTEN

Julian - Don't see
any changes in our program
at this time. Maybe
later on.
Sharp

25 Nov 80

File
Hq Mat
g/l W

Julian See Col Monday

It appears that these instructions change the forms required for the permit ie additional forms for each facility. Am I reading it correctly?

M.

How are we coming on the implementing order for the base?

14 Nov 80

Danny,
See Col's note (?) and Mr Elston note concerning POM
Let's discuss

Julian

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

12 Nov 80

From: Director
To: BMO

Subj: Haz. Mat. info

1. attached submitted for your info.

Julian

11/14/80

Note requirement to identify funding requirements on page #4. Lets get something in to the POM which is being prepared at present. Lets discuss.

BOR

OPNAV 5216/144 (REV. 6-7[illegible])
S/N 0107-LF-778-8099

DEPARTMENT OF THE NAVY

Memorandum

DATE: 31 Oct 80

FROM Paul Hubbell (LFE-2)

TO Julian Wooten

SUBJ Information Transfer

Encl: (1) DEQPPM 80-8 of 21 Oct 1980
(2) USEPA Air Pollution Training Information
(3) BNA INFORMATION

1. The enclosures are forwarded for your information/use as appropriate. Particular attention is directed to enclosure (1) which is the latest DoD policy guidance on the hazardous waste management regulations. Further interpretation and guidance will be forthcoming from HQMC, but during the interim, there are some key points in this document which may be helpful in implementing your hazardous material program. Specific emphasis should be placed on the concept of not calling a hazardous material a waste until actions have been exhausted for reutilization.
2. I also enclosed the latest BNA info. I highly recommend the Environment Reporter.

OFFICE OF THE ASSISTANT SECRETARY OF DEFENS

WASHINGTON, D C 20301

MANPOWER,
RESERVE AFFAIRS
AND LOGISTICS

21 OCT 1980

DEFENSE ENVIRONMENTAL QUALITY PROGRAM POLICY MEMORANDUM (DEQPPM) 80-8

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: RCRA Hazardous Waste Management Regulations

PURPOSE: This is to provide additional policy guidance to implement within the Department of Defense the hazardous waste management regulations of the Resource Conservation and Recovery Act (RCRA) of 1976.

BACKGROUND: On May 19, 1980, the Environmental Protection Agency (EPA) published implementing instructions to Subtitle C of RCRA which established a federal program to provide comprehensive regulation of hazardous waste. When fully implemented, this program will provide "cradle-to-grave" regulation of hazardous waste.

The Department of Defense is an entity responsible for determining when a material becomes a waste subject to RCRA Regulations. Applying the criteria set forth in Subparts C and D of 40 CFR Part 261 further qualifies the waste as hazardous at which point the RCRA Regulations become effective. Also, RCRA establishes standards for generators and transporters of hazardous waste that will ensure proper record-keeping and reporting, the use of a manifest system to track shipments of hazardous waste, the use of proper labels and containers, and the delivery of the waste to properly permitted treatment, storage, and disposal facilities. To ensure that these facilities are designed, constructed, and operated in a manner which protects human health and the environment, the regulations promulgate technical, administrative, monitoring, and financial standards for them. EPA will use these independently enforceable standards to issue permits to owners and operators of facilities.

Also in May, 1980, Defense Environmental Quality Program Policy Memorandum 80-5 was published to provide DoD policy on the disposal of hazardous materials. That policy designates the Defense Logistics Agency as responsible for the disposal of all hazardous materials except those that specifically remain the other DoD components' responsibilities.

Encl(1)

POLICY: The DoD policy is:

- To limit the generation of hazardous waste through alternative procurement practices and operational procedures that are attractive environmentally yet are fiscally competitive,

- To reutilize, reclaim, or recycle resources where practical and thus conserve on total raw material usage,

- To exhaust all other actions mandated by Federal statutes or regulations prior to identifying the material as discardable,

- To dispose of hazardous waste in an environmentally acceptable manner according to the disposal policy established in DEQPPM 80-5,

- To implement within DoD the hazardous waste management regulations that EPA published under Subtitle C of RCRA or that states enact under EPA authorization,

- To consider all unused hazardous materials as not regulated under RCRA until a decision is made to discard them, and

- To insure that all used hazardous materials are safely handled, accounted for, and controlled by internal DoD documentation. The internal controlling documentation will be applied to all movement among DoD activities and will reflect all data elements prescribed for auditing purposes and for shipping manifests as required by EPA or the states. The DoD component/entity assigned disposal responsibility by DEQPPM 80-5 will advise the using activities as to which "used" hazardous material must be controlled as a hazardous waste.

ACTION REQUIRED: DoD components will:

- Reduce hazardous waste generation to the maximum extent practical,

- Reutilize, reclaim, or recycle resources where practical, and

- Implement EPA hazardous waste management regulations.

As part of that implementation, any DoD installation that generates or transports hazardous waste or owns or operates a facility that treats, stores, or disposes of hazardous waste will notify EPA regional administrators as required. Each installation will obtain one EPA identification number. That identification number will be used for all subsequent reports and permit applications required for the installation.

Also, any installation which owns, operates, or proposes to own or operate a facility that treats, stores, or disposes of hazardous waste will apply for a permit from EPA or the state. That application is in two parts:

- Part A, which defines the process to be used, the design capability, and the hazardous waste to be handled, must be submitted by November 19, 1980.

- Part B, which contains more detailed information intended to establish that the facility can meet the technical standards that RCRA promulgated, must be submitted at a date that the regional administrator sets.

The installation commander will sign the permit application as the facility owner, and the operational manager of the permitted facility will sign the permit application as the operator. DLA or other tenants will sign as operation manager for all functions for which they have been assigned responsibility under DEQPPM 80-5. Each installation that requires a permit will submit one EPA Form 3510-1 for the installation (Form 1 - General Information) and an EPA Form 3510-3 for each permitted facility (Form 3 - Hazardous Waste Permit Application).

Implementation of the comprehensive hazardous waste management program mandated by RCRA requires maximum cooperation of all activities on an installation. The installation commander is responsible to ensure compliance with all RCRA requirements for the installation. The installation commander is responsible to notify, to apply for permits, and to report to EPA or the state, as required, for all installation activities, including tenants. The individual facility operational managers are accountable for conducting their activities in accordance with RCRA. Those facility managers, including supporting property disposal activities and tenant activities, will provide necessary documentation to the installation commander for permit application, will provide to the installation commander reports required by EPA or the state, and will ensure compliance with RCRA regulations and permit requirements at that facility. All reports to EPA or the state will be co-signed by the installation and facility operator or their designated officials.

For facilities that DoD owns but does not operate, the DoD component that owns the facility is responsible as the owner for purposes of the permit. For example, on an Army government-owned, contractor-operated plant, the contractor may be the applicant for the permit, but the local Army commanding officer is still responsible to ensure compliance.

DoD components will use the Disposal Turn In Document (DTID) or a bill of lading, as appropriate, modified to meet the EPA requirements, for the shipping manifest. The shipping activity, either servicing property disposal activity or facility operator, will manifest any shipment of hazardous waste off the installations in accordance with RCRA. The responsibility for tracking the manifest terminates at the permitted facility destination for that shipment; however, the shipper must obtain a copy of the completed manifest to show arrival at that destination. For shipments among DoD components, whether on the same installation or between installations, the turn-in activity's responsibility terminates upon receipt of a signed copy of the Disposal Turn In Document (DTID) or the govern-

ment bill of lading which serves as the internal manifest between the generator, the servicing DPDO, or other permitted receiver.

Each DoD component will take immediate action to identify all resources required to achieve full compliance with EPA and state regulations. Those resources will then be addressed, within program decision memorandum approved overall component resource levels, in future budget submissions.

An installation that requires permits for more than one program (RCRA, Safe Drinking Water Act, Clean Water Act, and Clean Air Act programs) is encouraged to consolidate its application, if possible, under EPA's consolidated permit program.

In special circumstances, and where it is mutually agreed among the installation, tenant, and EPA/State, exceptions to the above policies will be documented by the DoD component concerned and forwarded to DASD(EES) for approval.

The DASD(EES), in coordination with DASD(SM&T) and other OSD offices as necessary, shall monitor policy implementation for RCRA hazardous waste management, and shall decide any unresolved issues which may develop.

This memorandum is effective this date. Progress toward implementation of this memorandum and the RCRA hazardous waste regulations will be included in the environmental management-by-objective (MBO) semi-annual reports.

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

Paul H. Riley
Deputy Assistant Secretary of Defense
(Supply, Maintenance and Transportation)

6240

4 Nov 1980

Director, Natural Resources and Environmental Affairs Division

Base Maintenance Officer

Public Health Consideration Regarding Transformers at Bldg 20

Encl: (1) Supvy Chemist memo of 23 Oct 1980

1. This memo is to advise of the results of recent analysis of oil from the subject transformers which are located on top of drinking water storage tanks. The results contained in enclosure (1) indicate that an emergency situation does not exist, as no measurable amounts of polychlorinated biphynols (PCBs) were found in the transformers. However, NREA Division recommends that present actions to relocate the transformers be continued; suitable labels be attached to the transformers to document the date of analysis and results and every precaution be taken to ensure that no PCBs are added to these transformers.

J. I. WOOTEN

Copy to:
Util Dir

Tuylah, File this
Copy in Potable (drinking)
water after sending
copy to BMO.

DS

3 copies

OPNAV 5216/144 (REV. 6-70)
S/N 0107-LF-778-8099

DEPARTMENT OF THE NAVY

Memorandum

DATE: 23 October 1980

FROM: Ms. Betz, Q. C. Lab

TO: Mr. Sharpe, Ecologist

SUBJ: Transformers at Bldg. 20

ENCL: (1) Results of PCB Analysis of Transformers Oil

1. On tuesday, 30 September 1980, at approximately 1300, Andy Luke and myself went over to Bldg. 20, Hadnot Point Water Treatment Plant, to collect samples of the oil in the two transformers located over the underground water tank, as was requested by you and Lant Div.

2. Andy and one of the men from M&R Division loosened the drain spigots. Andy allowed the oil to drain into an extra test tube for a moment and then collected the sample in a clean test tube. The test tubes were marked with the transformers' manufacturer's name, serial number, and capacity. The two transformers afe:

Westinghouse	#3151358	242 gallon capacity
Standard	#101884	275 gallon capacity

3. The samples were then turned over to Mr. John Parrish from Lant Div, who carried them back to Norfork.

4. Enclosure (1) is the results from Jennings Laboratory of the PCB analysis of oil. Less than one part per million was reported.

EAB

23 October 1980

Ms. Betz, Q. C. Lab

Mr. Sharpe, Ecologist

Transformers at Bldg. 20

ENCL: (1) Results of PCB Analysis of TransformerOil

1. On tuesday, 30 September 1980, at approximately 1300, Andy Lutz and myself went over to Bldg. 20, Radnor Point Water Treatment Plant, to collect samples of the oil in the two transformers located over the underground water tank, as was requested by Yon and Lant Div.

2. Andy and one of the men from M&R Division loosened the drain spigots. Andy allowed the oil to drain into an extra test tube for a moment and then collected the sample in a clean test tube. The test tubes were marked with the transformers' manufacturers name, serial number, and capacity. The two transformers are:

Westinghouse	#3IS1358	242 gallon capacity
Standard	#1D1884	275 gallon capacity

3. The samples were then turned over to Mr. John Parrish from Lant Div, who carried them back to Norfork.

4. Enclosure (1) is the results from Jennings Laboratory of the PCB Analysis of oil. Less than one part per million was reported.

Donny,

ATTACHED are the results of the analysis for the transformers located at the top of the water reservoir bldg 20

pete C

LABORATORY MULTIPLE PARAMETER WATER QUALITY ANALYSIS RECORD

NAVY ENVIRONMENTAL PROTECTION SUPPORT SERV
1IND-CBC-3990/2 (REV. 10-74)
0900-LL-M90-0022

UIC

SAMPLE IDENTIFICATION

SAMPLE COLLECTION DATE			SAMPLE COLLECTION TIME	SAMPLE STATION NUMBER
MONTH	DAY	YEAR	0-2400	
10	03	80		

ACTIVITY NAME
WESTINGHOUSE SAMPLE #116 #3151358 242 gallons

LABORATORY NAME
JENNINGS LABORATORIES, INC.

	PARAMETER DESCRIPTION	UNITS	DATA ELEMENT NUMBER	VALUE
SOLIDS	TOTAL SUSPENDED SOLIDS (NON FILTERABLE RESIDUE)	MG/L	00530	
SOLIDS	TOTAL SOLIDS (TOTAL RESIDUE 103-105°)	MG/L	00500	
SOLIDS	SETTLEABLE SOLIDS (SETTLEABLE RESIDUE)	ML/L/HR	00545	
SOLIDS	TOTAL DISSOLVED SOLIDS (FILTERABLE RESIDUE)	MG/L	70300	
NUTRIENTS	N-AMMONIA (AS N)	MG/L	00610	
NUTRIENTS	N-NITRATE TOTAL (AS N)	MG/L	00620	
NUTRIENTS	N-NITRITE TOTAL (AS N)	MG/L	00615	
NUTRIENTS	TOTAL N (KJELDAHL)	MG/L	00625	
NUTRIENTS	ORTHOPHOSPHATE (AS PO_4)	MG/L	00660	
NUTRIENTS	TOTAL PHOSPHORUS (AS P)	MG/L	00678	
NUTRIENTS	SULFATE	MG/L	00945	
NON-CATEGORIZED PARAMETER	PH LABORATORY		00403	
NON-CATEGORIZED PARAMETER	CHLORIDE	MG/L	00940	
NON-CATEGORIZED PARAMETER	TURBIDITY LAB	JTU/FTU	W0072	
NON-CATEGORIZED PARAMETER	BOD	MG/L	00310	
NON-CATEGORIZED PARAMETER	COD	MG/L	00340	
NON-CATEGORIZED PARAMETER	TOC	MG/L	00680	
NON-CATEGORIZED PARAMETER	OIL AND GREASE	MG/L	70350	
NON-CATEGORIZED PARAMETER	PHENOLS	MG/L	32730	
NON-CATEGORIZED PARAMETER	MBAS	MG/L	38260	
NON-CATEGORIZED PARAMETER	CYANIDE	MG/L	00720	

	PARAMETER DESCRIPTION	UNITS	DATA ELEMENT NUMBER	VALUE
HEAVY METALS	ALUMINUM, TOTAL	MG/L	01105	
HEAVY METALS	ARSENIC, TOTAL	MG/L	01002	
HEAVY METALS	CADMIUM, TOTAL	MG/L	01027	
HEAVY METALS	CHROMIUM, TOTAL	MG/L	01034	
HEAVY METALS	COPPER, TOTAL	MG/L	01042	
HEAVY METALS	IRON, TOTAL	MG/L	01045	
HEAVY METALS	LEAD, TOTAL	MG/L	01051	
HEAVY METALS	MAGNESIUM, TOTAL	MG/L	00927	
HEAVY METALS	MANGANESE, TOTAL	MG/L	01055	
HEAVY METALS	MERCURY, TOTAL	MG/L	71900	
HEAVY METALS	POTASSIUM, TOTAL	MG/L	00937	
HEAVY METALS	SILVER, TOTAL	MG/L	01077	
HEAVY METALS	ZINC, TOTAL	MG/L	01092	
COLIFORM	TOTAL COLIFORM	MFC/100ML	31503	
COLIFORM	FECAL COLIFORM	MFC/100ML	31616	
COLIFORM	TOTAL COLIFORM	MPN/100ML	31506	
COLIFORM	FECAL COLIFORM	MPN/100ML	31620	
ADDITIONAL PARAMETERS	PCB	X	ppm	<1
ADDITIONAL PARAMETERS				
ADDITIONAL PARAMETERS				
ADDITIONAL PARAMETERS				

REMARKS
W9001

SIGNATURE
W. H. Jennings, Jr.

DATE
October 9, 1980

#2515 10/03/80

75 e°

Enclosure (1)

LABORATORY MULTIPLE PARAMETER WATER QUALITY ANALYSIS RECORD

NAVY ENVIRONMENTAL PROTECTION SUPPORT SERVICE
IIND-CBC-3900/2 (REV. 10-74)
0900-LL-M90-0022

UIC

SAMPLE IDENTIFICATION

SAMPLE COLLECTION DATE			SAMPLE COLLECTION TIME	SAMPLE STATION NUMBER
MONTH	DAY	YEAR	0-2400	
9	30	80		

ACTIVITY NAME: STANDARD SAMPLE #118 101884 275 gallons

LABORATORY NAME: JENNINGS LABORATORIES, INC.

	PARAMETER DESCRIPTION	UNITS	DATA ELEMENT NUMBER	VALUE
SOLIDS	TOTAL SUSPENDED SOLIDS (NON FILTERABLE RESIDUE)	MG/L	00530	
SOLIDS	TOTAL SOLIDS (TOTAL RESIDUE 103-105°)	MG/L	00500	
SOLIDS	SETTLEABLE SOLIDS (SETTLEABLE RESIDUE)	ML/L/HR	00545	
SOLIDS	TOTAL DISSOLVED SOLIDS (FILTERABLE RESIDUE)	MG/L	70300	
NUTRIENTS	N-AMMONIA (AS N)	MG/L	00610	
NUTRIENTS	N-NITRATE TOTAL (AS N)	MG/L	00620	
NUTRIENTS	N-NITRITE TOTAL (AS N)	MG/L	00615	
NUTRIENTS	TOTAL N (KJELDAHL)	MG/L	00625	
NUTRIENTS	ORTHOPHOSPHATE (AS PO_4)	MG/L	00660	
NUTRIENTS	TOTAL PHOSPHORUS (AS P)	MG/L	00678	
NUTRIENTS	SULFATE	MG/L	00945	
NON-CATEGORIZED PARAMETER	PH LABORATORY		00403	
NON-CATEGORIZED PARAMETER	CHLORIDE	MG/L	00940	
NON-CATEGORIZED PARAMETER	TURBIDITY LAB	JTU/FTU	W0072	
NON-CATEGORIZED PARAMETER	BOD	MG/L	00310	
NON-CATEGORIZED PARAMETER	COD	MG/L	00340	
NON-CATEGORIZED PARAMETER	TOC	MG/L	00680	
NON-CATEGORIZED PARAMETER	OIL AND GREASE	MG/L	70350	
NON-CATEGORIZED PARAMETER	PHENOLS	MG/L	32730	
NON-CATEGORIZED PARAMETER	MBAS	MG/L	38260	
NON-CATEGORIZED PARAMETER	CYANIDE	MG/L	00720	

	PARAMETER DESCRIPTION	UNITS	DATA ELEMENT NUMBER	VALUE
HEAVY METALS	ALUMINUM, TOTAL	MG/L	01105	
HEAVY METALS	ARSENIC, TOTAL	MG/L	01002	
HEAVY METALS	CADMIUM, TOTAL	MG/L	01027	
HEAVY METALS	CHROMIUM, TOTAL	MG/L	01034	
HEAVY METALS	COPPER, TOTAL	MG/L	01042	
HEAVY METALS	IRON, TOTAL	MG/L	01045	
HEAVY METALS	LEAD, TOTAL	MG/L	01051	
HEAVY METALS	MAGNESIUM, TOTAL	MG/L	00927	
HEAVY METALS	MANGANESE, TOTAL	MG/L	01055	
HEAVY METALS	MERCURY, TOTAL	MG/L	71900	
HEAVY METALS	POTASSIUM, TOTAL	MG/L	00937	
HEAVY METALS	SILVER, TOTAL	MG/L	01077	
HEAVY METALS	ZINC, TOTAL	MG/L	01092	
COLIFORM	TOTAL COLIFORM	MFC/100ML	31503	
COLIFORM	FECAL COLIFORM	MFC/100ML	31616	
COLIFORM	TOTAL COLIFORM	MPN/100ML	31506	
COLIFORM	FECAL COLIFORM	MPN/100ML	31620	
ADDITIONAL PARAMETERS	PCB	X	ppm	<1
ADDITIONAL PARAMETERS				
ADDITIONAL PARAMETERS				

REMARKS
W9001

SIGNATURE: W. H. Jennings Jr.

DATE: October 9, 1980

#2516 10/03/80

75.00

Enclosure (1)

Danny

Sub See Date D Sharpe

Johnson

Hazel Wade

File

ASSISTANT CHIEF OF ST[redacted], FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 10-14-80

TO:

[BASE MAINT O]	DIR, FAMILY HOUSING
PUBLIC WORKS O	DIR, BACHELOR HOUSING
COMM-ELECT O	BASE FIRE CHIEF
MOTOR TRANSPORT O	

ATTN: _____

1. Attached is forwarded for info/action

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

3. Your file copy.

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

P-MCBCL-1757

6240

DISTRIBUTION
BMO
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PAGE 01
Admin D.
Oper D.
M&R D.
Tele D.
Util D.
F&A O.
MMP O.
MME
Maint NCO
Secretary

PRIORITY

****
PRIORITY * U N C L A S S I F I E D *
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PT 00412 283/2303Z

PTTUZYUW PUEACMC4723 2832300-UUUU--PUEBDOA.
ZNR UUUUU
P R 031502Z OCT 80 // COMM NOTE: MSG ROUTED BY
FM CMC WASHINGTON DC SSIC 06260 //
TO AIG EIGHT ACT: CG MCB
INFO RUENAAA/CNO WASHINGTON DC
RULSSAA/COMNAVFACENGCOM ALEXANDRIA VA
BT
UNCLAS //N06280//
CNO PASS TO OP45, COMNAVFACENGCOM PASS TO 1122
SUBJ: MCBUL 6280. HAZARDOUS WASTE (HW) MANAGEMENT PLAN
(CMC CODE LFF-2)
A. MCBUL 6280 OF 1 MAY 1980
1. COMPLETION DATE FOR THE SUBJ PLAN REQUIRED BY ACTIVITIES
HANDLING HAZARDOUS WASTE AND DETAILED IN THE REF IS HEREBY EXTENDED
FROM 1 OCT 1980 TO 3 NOV 1980.
2. THIS BULLETIN CANCELED 31 DEC 1980.
BT
#4723

NNNN

ORIGINAL
ACTION

ACT: FAC,
INFO: TRNG, MANP, ADJ, SAFD, CBC, CPO /43
NRMC

Erowne Natural Res got copy.
M

****
PRIORITY * U N C L A S S I F I E D *
****

031502Z Oct 80

6240

MAIN/DDS/th
6240

OCT 2 2 1980

From: Base Maintenance Officer
To: Base Safety Manager

Subj: Proposed BO P5101, Pentachlorophenol (PCP) Treated Lumber

Ref: (a) Resource Conservation and Recovery Act (RCRA) of 1976
(b) Clean Air Act

Encl: (1) BSafetyMgr ltr SAFD/RJA/jjs 5101 of 2 Oct 1980

1. Enclosure (1) has been reviewed by this office. In addition to suggested changes indicated on enclosure (1), the following comments are provided:

a. Pentachlorophenol chemicals are subject to reference (a). PCP treated wood is not under normal circumstances.

b. Generally, all types of open burning of scrap lumber are regulated by reference (b) except for individual home heating. Consequently, all types of burning of PCP contaminated lumber should be avoided either for health/safety or environmental reasons.

2. For further assistance, please contact Mr. Danny Sharpe, Base Maintenance Department, extensions 5003/2083.

F. H. MOUNT

BASE SAFETY OFFICE
Marine Corps Base
Camp Lejeune, North Carolina 28542

SAFD/RJA/jjs
5101
2 October 1980

From: Base Safety Manager
To: (1) Defense Property Disposal Office, Attn: Mr. King
(2) Natural Resources and Environmental Affairs Division, Attn: Mr. Sharp
(3) Industrial Health Service, NRMC, Attn: Industrial Hygienist

Subj: Proposed Base Order P5101, Pentachlorophenol (PCP) Treated Lumber

1. Please review and comment on subject Base Order prior to circulating for staffing.

R. J. Andrews

R. J. ANDREWS.

BASE ORDER P5101.

From: Commanding General
To: Distribution List

Subj: Pentachlorophenol (PCP) Treated Lumber

Ref: (a) MCB 5101
(b) Defense Disposal Manual DOD 4140.21M
(c) Clean Air Act
(d) Resource Conservation and Recovery Act of 1976.

1. Purpose. To publish information relative to the potential hazards involved and procedures required in handling and working with PCP treated lumber.

2. Background

a. Recently there has been considerable public interest in the use of PCP, particularly within the Army. There have been allegations linking the handling and use of PCP to occupational illness and cancer. While this cause and effect relationship has not been absolutely proven, there is some evidence that it does exist. The National Institute of Health (NIH), National Cancer Institute (NCI), and the National Institute of Occupational Safety and Health (NIOSH) are examining the relationship in detail.

b. The primary use of PCP is as a wood preservative, e.g., ammunition boxes. It may also be used as a wood preservative in general construction lumber such as that used to build sun decks, garden plots, etc. Some manufacturers, however, are supplying items treated with copper napthenate which has a lower toxicity than PCP. There is no way, short of chemical analysis, to determine what lumber is treated with which preservative since the lumber does not generally have markings indicating the treatment agent. It should be noted, however, that lumber treated with copper napthenate is characteristically green in color. Regardless, the same precautions are

adequate for the handling of items treated with either preservative.

c. PCP is of moderate oral toxicity. The dust is irritating to the eyes, nose, and throat. It may cause dermatitis with prolonged or repeated skin contact and may be absorbed easily through the intact skin. The recommended Threshold Limit Value (TLV) for an 8-hour day is 0.5 milligram per cubic meter of air. However, there is no field expedient method of determining the concentration of PCP in the air at a work site. The odor of PCP is distinctive, according to hygiene guides, but is not reliable as a measure of the atmospheric concentration.

3. Information. Because PCP may become a hazard to personnel unless proper precautions are taken when handling/using PCP treated material, the following guidance is provided:

a. Material treated with PCP and dried properly represents a minimal hazard to personnel, but should be handled with caution and skin contact or inhalation avoided. Leather palm gloves are recommended for handling treated items. Gloves, and all clothing which contacts the treated items, should be replaced or laundred frequently to prevent the accumulation of PCP.

b. PCP treated items that show areas of wetness, tackiness or evidence of crystallization on the surface, represent a potential hazard to personnel. Handling such items may allow easy transference of PCP to personnel and their clothing. Under conditions of warm temperatures or enclosed storage, the PCP and its solvents may vaporize causing an inhalation or eye irritation problem.

(1) An obvious odor of PCP, or irritation of the eyes, nose or throat, are indications of potentially harmful airborne

PCP. Ventilation sufficient to reduce the irritation to an unnoticeable level or respiratory protection from organic vapors is required.

(2) Leather palm gloves and aprons of rubber, vinyl or other materials impervious to PCP are necessary to prevent physical contact with treated items.

(3) Personnel shall be required to wash prior to earing, smoking, and after each shift.

c. Personnel shall avoid burning wood ~~for heating in a closed or inadequately ventilated area, e.g., fireplaces~~, because of the toxicity of PCP and its vaporization potential when heated, and ~~For these same reasons and because of the potential for environmental pollution, open burning of treated lumber under field conditions for heating purposes shall not be permitted~~. potential conflict with reference (a),

d. Ammunition boxes and other PCP treated wood products will slowly decompose and bleed PCP from the surface when exposed to sunlight and natural weathering. This lumber is generally safe to handle as is, if the appropriate protective measures, as described previously, are taken. However, caution shall be exercised if working with PCP treated wood surfaces (sanding, sawing, etc.). This is necessary sinch such operations release PCP contaminated wood dust to the work environment which could initiate an allergic reaction requiring medical attention.

e. Since bulk PCP is available commercially, painting it on lumber is a method frequently used to treat wood products locally. When such operations are conducted, there is potential exposure to PCP in both liquid and airborne form; stringent controls for the protection of personnel are required.

(f) Disposal of excess or waste PCP chemicals shall be effected in accordance with reference (d), Contact Base Maintenance officer representative, Building 1103, phone 5003 for further guidance.

(1) There shall be adequate ventilation to maintain the atmospheric concentration below the TLV.

(2) Treated items shall be placed outdoors immediately.

(3) Personnel with a history of pulmonary, skin, liver or kidney disorders shall be evaluated medically before being assigned to PCP treating operations.

(4) Personal protective equipment/measures shall include:

(a) Leather palm gloves and aprons of rubber, vinyl, or other material impervious to PCP.

(b) Eye protection (chemical goggles).

(c) Respiratory ~~xxxxx~~ protection from organic vapors (MESA/NIOSH approved) organic respirator.

(5) Personnel shall wash before eating or smoking, and at the end of each shift.

f. Disposal of PCP treated ~~material~~ lumber should be accomplished as follows:

(1) Report the item to the Defense Property Disposal Office (DPDO), Building 906, (ext. 1634) in accordance with reference (b).

(2) If disposation cannot be effected through the local DPDO for disposal, ~~contact Natural Resources and Environmental Affairs Division, Building 1103, Phone 5003 for further guidance~~ the treated lumber should be disposed of at the Base Sanitary Landfill.

4. Action.

a. Commanders will ensure that PCP and PCP treated materials are not transferred to the public by any means.

b. Commanders will institute appropriate protective measures, based on this order, in those workplaces under their control where treated lumber is used/handled.

c. Supply Services shall request vendors to indicate the treatment agent when treated lumber is procured locally.

d. Commanders will ensure that PCP treated materials are not utilized for open burning under field conditions for heating purposes.

e. Commanders will initiate an informational program to acquaint all personnel, particularly those who may be "do-it-yourselfers," with the appropriate precautions to take when working with treated lumber.

5. Applicability. Having received the concurrence of the Commanding Generals, 2d Marine Division, FMF, and 2d Force Service Support Group, FMF, ATlantic, and the Commanding Officers, Marine Corps Air Station (h), New River, Naval REgional Medical Center, and Naval REgional Dental Center, this Order is applicable to those Commands.

File
H2
WSTE

A coeur,

D Shaye

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

20 Oct 80

From: Director, NREA Division
To: BMO
Subj: Hazardous Material Info

1.

Submitted as requested.

Julian

Please return to Natl Res

Julian,
Thanks
M

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

WASHINGTON, D.C. 20301

13 MAY 1980

13 MAY 1980

MANPOWER,
RESERVE AFFAIRS
AND LOGISTICS

Defense Environmental Quality Program Policy Memorandum
(DEQPPM No. 80-5)

MEMORANDUM FOR DEPUTY FOR ENVIRONMENT, SAFETY AND OCCUPATIONAL HEALTH, OASA (IL&FM)
DEPUTY UNDER SECRETARY OF THE NAVY
DEPUTY FOR ENVIRONMENT AND SAFETY, SAF/MIQ
DIRECTOR, DEFENSE LOGISTICS AGENCY

SUBJECT: Department of Defense Hazardous Material Disposal Policy

PURPOSE: This is to provide Department of Defense (DoD) policy guidance on the disposal of hazardous materials. This memorandum supercedes DEQPPM 79-4, "Department of Defense Hazardous Material Disposal Policy," of December 17, 1979.

BACKGROUND: DoD possesses large quantities of hazardous materials, both new items and waste products, that must be disposed of in an environmentally acceptable manner. The Resource Conservation and Recovery Act of 1976 (RCRA) and the Toxic Substance Control Act of 1976 (TSCA) require that DoD update its disposal policy regarding hazardous materials.

In 1974, DoD designated the Defense Supply Agency, subsequently renamed the Defense Logistics Agency (DLA), to be responsible ". . . for the disposition of items identified as unsalable because the material has no sales value . . . (except) refuse and trash . . . (and) items . . . restricted by law or military regulation." Some of the materials reassigned to DLA were hazardous, but the overall hazardous material disposal responsibility was not specifically addressed in the 1974 policy.

In December of 1979, the Deputy Assistant Secretary of Defense, Energy, Environment and Safety (DASD-EES), in coordination with the Deputy Assistant Secretary of Defense, Supply, Maintenance, and Transportation (DASD-SM&T), issued Defense Environmental Quality Program Policy Memorandum 79-4 (DEQPPM 79-4) which provided urgently needed guidance on hazardous material disposal. After the policy was issued, representatives of the military departments, DLA, and OASD(MRA&L) agreed to refine further DoD policy. This DEQPPM 80-5 includes the refinements which those representatives recommended. For purposes of this memorandum, the term DoD components refers to the military departments and all defense agencies except disposal operating entities of DLA. Other terms used in this policy are defined in Tab A.

POLICY: DoD policy is to dispose of hazardous materials in an environmentally acceptable manner:

ENCLOSURE #1

- DLA is designated the responsible agency within DoD for worldwide disposal of all hazardous materials, except for those categories of materials specifically designated for DoD component disposal (Tab B). Specific DLA responsibilities for disposal of assigned hazardous materials are in Tab C.

- DoD components shall dispose of those categories of hazardous materials listed in Tab B. In addition, the DoD component shall support DLA disposal actions as specified in Tab D.

- The DASD(EES), in coordination with DASD(SM&T) and other OSD offices as necessary, shall formulate, implement, and monitor policy for disposal of hazardous material and shall decide any unresolved issues which may develop, including the reassignment of responsibility for disposal of specific categories of hazardous material when circumstances warrant.

- No other changes are made to the respective disposal mission responsibilities of the DoD components or DLA.

IMPLEMENTATION: This memorandum is effective immediately and should be implemented as rapidly as possible.

- DLA shall make optimum use of existing disposal capabilities and resources.

- DLA shall program for the additional resources required to discharge its responsibilities under this memorandum.

- DLA is directed to organize immediately and chair an inter-service task group to plan actions and milestones for the full implementation of this policy and submit their report to DASD(EES) within 120 days from the date of this memorandum.

- The task group will develop and promulgate a hazardous materials data call to identify current and projected hazardous materials disposal workload, as well as the actions and methodology employed to dispose of those materials. The task group should also identify, in as much detail as possible, the technical support and assistance which can be provided DLA in its efforts to insure expeditious disposal of hazardous materials in an environmentally safe manner. The task group will identify those additional resource requirements which, if made available to DLA, can be effectively applied to expedite hazardous materials disposal during FY 80 and FY 81.

Paul H. Riley
Deputy Assistant Secretary of Defense
(Supply, Maintenance and Transportation)

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

Enclosures:

Tab A - Definitions

Tab B - Materials Assigned to DoD Components for Disposal

Tab C - Responsibilities of DLA for Disposal of Assigned Hazardous Materials

Tab D - Responsibilities of the DoD Components in Support of the DLA Disposal of Hazardous Materials.

DEFINITIONS

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

For the purposes of this memorandum, hazardous materials do not include those radioactive materials that the Nuclear Regulatory Commission controls. Licensees shall be responsible for the disposal of those materials per 10 CFR 20.

Hazardous material may be defined as personal property consisting of items, scrap, and waste:

Items - All unused, used, or contaminated property or combinations of property, (unused, used, mixed or contaminated) which can be identified by a national stock number, manufacturer's part number, military specification number, or locally purchased property with a locally applied stock number. Also, that property which by military regulation requires application of a local stock number prior to disposal.

Scrap - Used or unused property which has no value except for basic material content.

Waste - Used or unused property, residues, by-products, sludges, and other materials, which have no known utility and must, therefore, be discarded.

Conforming storage is a facility or location which conforms to regulations of the Environmental Protection Agency and other regulatory authorities governing the storage of hazardous materials.

The generating activity is an organization or element authorized to turn-in property to the Defense Property Disposal Service.

Materials Assigned to DoD Components for Disposal

DoD components shall be responsible for disposal of the following categories of hazardous materials which have not been assigned to DLA:

1. Toxicological, biological, radiological, and lethal chemical warfare materials which, by U.S. law, must be destroyed. Disposal of the by-products of such material is the responsibility of the DoD component with assistance from DLA.

2. Material which cannot be disposed of in its present form due to military regulations, e.g., consecrated religious items and cryptographic equipment.

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

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

5. Sludges resulting from municipal type wastewater treatment facilities.

6. Sludges and residues generated as a result of industrial plant processes or operations.

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

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

Responsibilities of DLA
for Disposal of
Assigned
Hazardous Materials

Specific DLA responsibilities in this area shall include, but not necessarily be limited to, the following:

1. Accomplish documentation for DLA disposal actions as required under laws and regulations.

2. Initiate contracts or agreements for disposal.

3. Accept accountability for all hazardous materials except those categories specifically excluded in Tab B, which have been properly identified, packaged, labeled, and certified in conformance with established criteria.

4. Accept custody of hazardous materials within the following guidelines:

- If DLA possesses conforming storage at the defense property disposal offices (DPDO), DLA will accept physical custody at the time it accepts accountability.

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

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

- DLA will be responsible for the long term programming of military construction funding for conforming storage in support of its disposal mission.

- If DLA and the component involved cannot mutually agree on the best procedure for storage and handling pending final disposal, the issue shall be referred at once to OASD(MRA&L) for resolution.

5. Provide any required repackaging or handling of hazardous materials subsequent to acceptance of accountability from the generating activity.

6. Establish an inventory control system for the types, quantities, and locations of available hazardous materials for which DLA is responsible in the event that some other activity might be able to use a particular material as a resource.

7. Provide feedback to the military departments and defense agencies on the costs associated with disposal in order that this information might serve as an economic incentive to minimize waste generation.

8. Contract for disposal technology not available in-house or from the DoD components.

9. Minimize environmental risks and costs associated with extended care, handling, and storage of hazardous materials by accomplishing disposal within a significantly compressed disposal cycle. Initiate actions and projects within DoD and in conjunction with federal civil agencies and industry to realize this objective and expedite final disposal.

10. Devise a system by which the time of turn-in will be highly visible on hazardous materials to insure proper application of resources to dispose of these materials. DLA should insure that sufficient disposal capability is programmed to preclude extended delays in the hazardous materials disposal process.

11. Establish and maintain an analysis and information distribution capability to:

- Evaluate the impact and applicability of current technological advances on DoD hazardous material disposal procedures and inform the DoD components of these developments on a continuing basis.

- Assure that the DoD components are apprised, on a continuing basis, of any federal, state, regional, and local regulations being developed to control hazardous material disposal.

12. Become the DoD focal point to recommend to DASD(EES) matters of policy and guidance for hazardous material disposal.

13. Establish procedures relative to assigned responsibility for hazardous material disposal. Unresolved issues will be forwarded to OASD(MRA&L) with appropriate comments.

14. DLA shall program to carry out their responsibilities through normal budgeting channels.

Responsibilities of the DoD Components in Support of the DLA Disposal of Hazardous Materials

1. Where feasible, minimize quantities of hazardous waste through resource recovery, recycling, source separation, and acquisition policies.

2. Provide available technical and analytical assistance, including R&D support, to DLA to accomplish disposal, if requested.

3. Provide all available information to DLA, as required, to complete environmental documentation, e.g., environmental impact statement associated with disposal.

4. Properly identify, package, label, and certify conformance with established criteria prior to transfer of accountability to DLA. Subsequent repackaging or handling is the responsibility of DLA.

5. DoD components will retain custody of hazardous materials within the following guidelines:

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

- In those instances where neither DLA nor the generating activity possesses conforming storage, the activity with the "most nearly" conforming storage will accept/retain custody.

- If DLA and the component involved cannot agree on the best procedure for storage and handling pending final disposal, the issue will be referred at once to OASD(MRA&L) for resolution.

- When a DoD component retains custody of a hazardous material, this hazardous material shall be kept on the accountable records of DLA.

6. When requested, the DoD components will assist DLA by providing information and comments on federal, state, regional, and local regulations being developed to control hazardous material disposal, e.g., ability of particular installations to comply and impact on DoD. The DoD components will alert DLA to any local situation which could impact on hazardous materials disposal.

7. DoD components shall program to carry out their responsibilities through normal budgeting channels.

6240

31 Oct 1980

Base Maintenance Department

Application for Hazardous Waste Permit, Part A; submission of

Resource Conservation and Recovery Act of 1976, as amended
MCBul 6280 of 1 May 1980
(c) LANTNAVFACENGCOM Norfolk Va msg 291346Z Aug 80

The subject application is required by the Environmental Protection Agency (EPA) for the storage of hazardous waste (over 90 days) and the treatment and/or disposal of hazardous waste under regulation promulgated to implement reference (a).

Reference (b) directed activity Commanders to submit required information to EPA and state/local regulatory agencies via the Cognizant EFD of the Naval Facilities Engineering Command. The attached application, if submitted to EPA by 19 November 1980, will provide "interim status" authorizing base to store hazardous waste for over 90 days. Final permits will be issued upon submission of Part B to EPA along with detailed, site specific information. Part B information requirements have not been fully developed by EPA. Part B of the permit application is not required until requested by EPA. At that time, base will have six months to submit Part B. At present, there are no state or local permit requirements. Storage for over 90 days without "interim status" could result in civil or criminal penalty.

It is recommended the attached application be signed and the original and one copy forwarded to Naval Facilities Engineering Command, as requested by reference (c).

Very respectfully,

F. H. MOUNT
Base Maintenance Officer

MAIN/JIW/th
6240
31 Oct 80

From: Commanding General
To: Commander, Atlantic Division, Naval Facilities Engineering Command, Norfolk, Virginia 23511 (Code 114)

Subj: Application for Hazardous Waste Permit; submission of

Ref: (a) Resource Conservation and Recovery Act
(b) LANTNAVFACENGCOM Norfolk Va msg 291346Z Aug 80

Encl: (1) Environmental Protection Agency (EPA) Forms 3510-1 and 3510-2

1. Enclosure (1) has been completed by this Command, as required by reference (a), and is submitted, as requested by reference (b), for your review and transmittal to Region IV, Environmental Protection Agency, Atlanta, Georgia.

2. Point of contact regarding this matter is Mr. Danny Sharpe, Ecologist, Base Maintenance Department, (AUTOVON) 484-5003.

D. B. BARKER

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 10-14-80

TO:

[BASE MAINT O]

PUBLIC WORKS O

COMM-ELECT O

MOTOR TRANSPORT O

DIR, FAMILY HOUSING

DIR, BACHELOR HOUSING

BASE FIRE CHIEF

ATTN: Cy Provided PWD

1. Attached is forwarded for info/~~action~~ (OBE)

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

3. Your file copy.

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

P-MCBCL-1757

Danny

Note + Return for

File

DS

DEPARTMENT OF THE NAVY
COMMANDER NAVAL BASE
NORFOLK, VIRGINIA 23511

IN REPLY REFER TO:
Code A02A/11
6280
8 OCT 1980

From: Commander Naval Base, Norfolk, Virginia 23511
To: Distribution

Subj: Navy Hazardous Materials Environmental Management Workshop II

Ref: (a) LANTNAVFACENGCOM ltr 114:PAR of 19 Sep 1980
(b) OPNAVNOTE 6240 of 20 Feb 1980, Subj: Navy Hazardous Materials Environmental Program
(c) 40 CFR Parts 260-265 of 19 May 1980

Encl: (1) Fleet Training Center, Norfolk, ltr 11000/NTT:faw 531284R3-TUA ser N374/1376 of 10 September 1980
(2) Workshop II Agenda

1. Reference (a) notified all concerned that the Atlantic Division, Naval Facilities Engineering Command (LANTNAVFACENGCOM) will hold a second two-day workshop to provide further technical assistance in implementing reference (b) and to comply with reference (c) hazardous waste and environmental regulations. This workshop will be held in the Fleet Training Center, auditorium, Building N-30, at the Naval Station, Norfolk, Virginia, on 15 and 16 October 1980, from 0800 to 1600 each day. Telephone registration is requested by 10 October 1980. Restrictions on utilizing the Fleet Training Center auditorium and parking information are provided in enclosure (1).

2. The agenda for Workshop II is contained in enclosure (2).

3. It is requested that the designated point of contact for hazardous materials and environmental management at each activity participate. Timely and coordinated efforts are necessary to effectively implement references (a) and (b).

4. For further information, please contact LANTNAVFACENGCOM, Code 114, Mr. Paul Rakowski, (804) 444-4923, AUTOVON 690-4923 or Mr. Steve Olson, (804) 444-4963, AUTOVON 690-4963.

R. A. Lines

R.A. LINES
By direction

Distribution: (See Page 2)

Code A02A/11
6280
8 OCT 1980

Distribution: (COMFIVE/COMNAVBASENORVAINST 5216.2K)
List I (only 5, 6, 7, 10, 15, 18, 19, 25, 28-1, 29, 32, 45, 47, 51, 57, 58, 59, 66, 68, 75, 79, 80, 84, 97, 113)
List II (only 12, 13, 15, 17, 19)
List III (only 1, 21)
List IV (only 6)
List V (only 1)
List VI (only 1, 1a, 3, 4, 25, 31, 33, 35, 46, 55, 57, 58, 59)
List IX

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ABL CUMBERLAND

DEPARTMENT OF THE NAVY
FLEET TRAINING CENTER
NORFOLK, VIRGINIA 23511

11000/NTP:faw
531284R3-TUA
Ser N374/1376
10 SEP 1980

From: Commanding Officer, Fleet Training Center, Norfolk, VA 23511
To: Commander, Atlantic Division, Naval Facilities Engineering Command, Norfolk, VA 23511

Subj: Auditorium Reservation

Ref: (a) COMLANTNAVFACENGCOM ltr 114:SGO 6280 of 2 Sep 1980

Encl: (1) Floor Plan Building N-30

1. The Fleet Training Center, Norfolk auditorium has been reserved for a workshop presentation on 15-16 October 1980 from 0730 to 1600 as requested by reference (a).

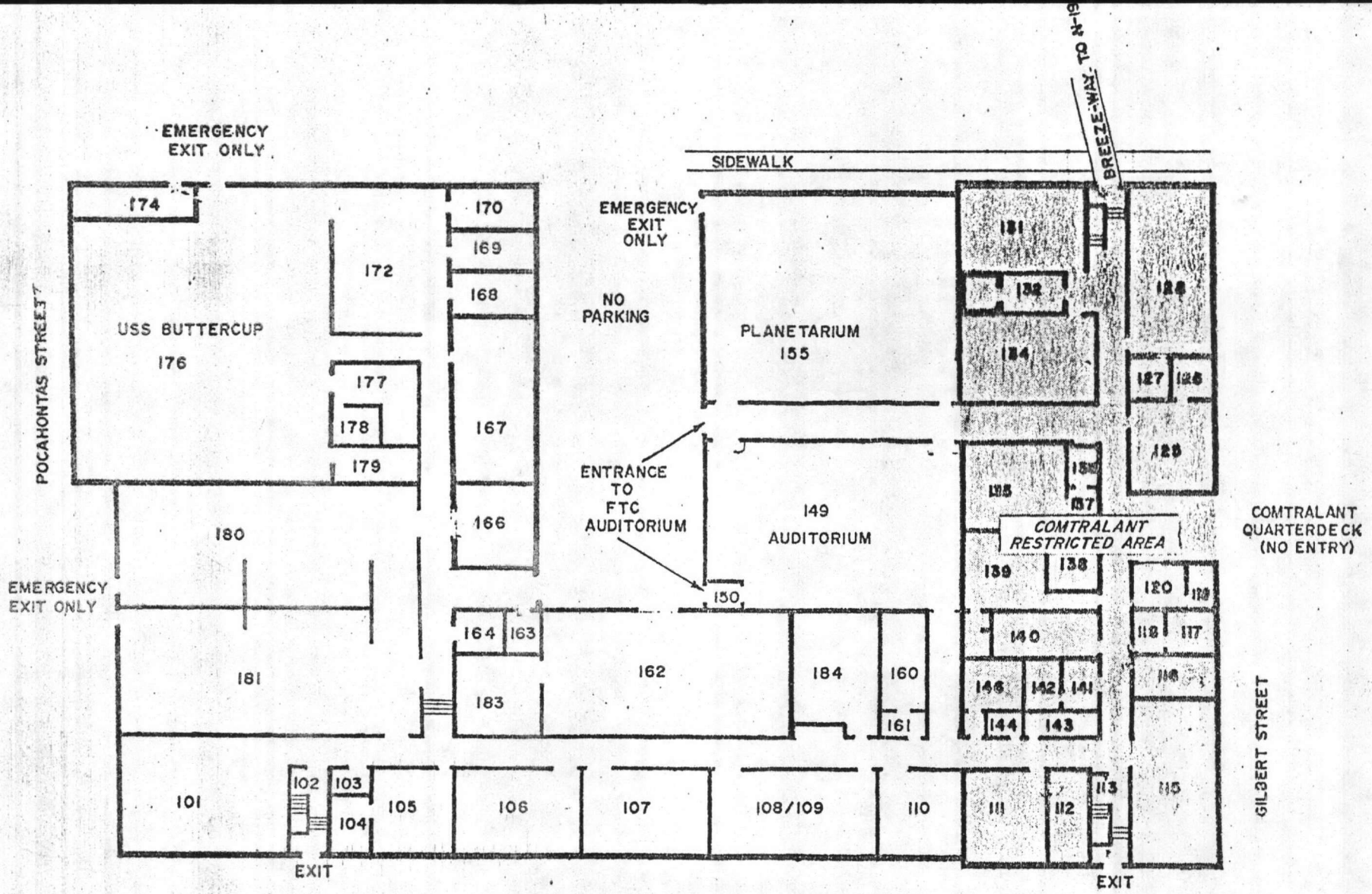
2. Reserved parking spaces are not available at Fleet Training Center, Norfolk, but ample parking is provided near the helo-port and across the street from the Windjammer Club. Please use the rear entrance to the auditorium at Building N30, as shown in enclosure (1). The breezeway entry connecting Building N30 to Building N19A may be used only during inclement weather and after regular working hours. After normal working hours, access to the auditorium is controlled by the Fleet Training Center Quarterdeck OOD inside the main entrance to Building N19A. COMTRALANT Flag office spaces are in close proximity to the auditorium and are not to be utilized for any purpose by auditorium visitors.

3. UNIFORM ATTIRE FOR AUDITORIUM VISITORS WILL BE NAVAL STATION SEASONAL UNIFORM OF THE DAY.

4. Media support will be made available as requested. Point of contact is FLETRACEN Training Support at 444-2478.

T. V. KEENER
By direction

ENCLOSURE (1)



FLEET TRAINING CENTER
BUILDING N-30 FIRST FLOOR
NAVAL STATION NORFOLK, VA.

ENCLOSURE (1) OF ENCLOSURE (1)

WORKSHOP II

HAZARDOUS MATERIALS ENVIRONMENTAL MANAGEMENT

15 OCTOBER 1980

0800-0830	Registration
0830-0835	Opening Remarks
0835-0900	Current Status of Navy Program
0900-1000	RCRA Permits
1000-1015	Break
1015-1200	Permit Workshop and Hazardous Waste Storage Facility Tour (1)
1200-1300	Lunch
1300-1445	Permit Workshop and Hazardous Waste Storage Facility Tour (continued)
1445-1600	Post 19 November 1980, Implementation of 40 CFR 264 and 265; Treatment, Storage and Disposal Facilities

(1) Attendees will divide into groups for tour and the workshop.

ENCLOSURE (2)

16 OCTOBER 1980

0800-0830	Defense Property Disposal Office Role under DEQPPM 80-5
0830-0900	DPDO and PWC/PWD Interface
0900-0915	COMNAVBASE Hazardous Materials Environmental Management Instruction
0915-1015	Post 19 November 1980, Implementation of 40 CFR 262 and 263; Generators and Transporters
1015-1030	Break
1030-1115	Hazardous Materials/Waste: Manifest and Pre-Transport Requirements
1115-1145	Hazardous Waste Management Plans
1145-1230	Lunch
1230-1445	Problem Areas and Activity Open Forum

Fila Haz Mal

J d W

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

WASHINGTON, D.C. 20301

13 MAY 1980

13 MAY 80

MANPOWER,
RESERVE AFFAIRS
AND LOGISTICS

Defense Environmental Quality Program Policy Memorandum
(DEQPPM No. 80-5)

MEMORANDUM FOR DEPUTY FOR ENVIRONMENT, SAFETY AND OCCUPATIONAL HEALTH, OASA (IL&FM)
DEPUTY UNDER SECRETARY OF THE NAVY
DEPUTY FOR ENVIRONMENT AND SAFETY, SAF/MIQ
DIRECTOR, DEFENSE LOGISTICS AGENCY

SUBJECT: Department of Defense Hazardous Material Disposal Policy

PURPOSE: This is to provide Department of Defense (DoD) policy guidance on the disposal of hazardous materials. This memorandum supercedes DEQPPM 79-4, "Department of Defense Hazardous Material Disposal Policy," of December 17, 1979.

BACKGROUND: DoD possesses large quantities of hazardous materials, both new items and waste products, that must be disposed of in an environmentally acceptable manner. The Resource Conservation and Recovery Act of 1976 (RCRA) and the Toxic Substance Control Act of 1976 (TSCA) require that DoD update its disposal policy regarding hazardous materials.

In 1974, DoD designated the Defense Supply Agency, subsequently renamed the Defense Logistics Agency (DLA), to be responsible ". . . for the disposition of items identified as unsalable because the material has no sales value . . . (except) refuse and trash . . . (and) items . . . restricted by law or military regulation." Some of the materials reassigned to DLA were hazardous, but the overall hazardous material disposal responsibility was not specifically addressed in the 1974 policy.

In December of 1979, the Deputy Assistant Secretary of Defense, Energy, Environment and Safety (DASD-EES), in coordination with the Deputy Assistant Secretary of Defense, Supply, Maintenance, and Transportation (DASD-SM&T), issued Defense Environmental Quality Program Policy Memorandum 79-4 (DEQPPM 79-4) which provided urgently needed guidance on hazardous material disposal. After the policy was issued, representatives of the military departments, DLA, and OASD(MRA&L) agreed to refine further DoD policy. This DEQPPM 80-5 includes the refinements which those representatives recommended. For purposes of this memorandum, the term DoD components refers to the military departments and all defense agencies except disposal operating entities of DLA. Other terms used in this policy are defined in Tab A.

POLICY: DoD policy is to dispose of hazardous materials in an environmentally acceptable manner:

ENCLOSURE 4 (1 & 2)

- DLA is designated the responsible agency within DoD for worldwide disposal of all hazardous materials, except for those categories of materials specifically designated for DoD component disposal (Tab B). Specific DLA responsibilities for disposal of assigned hazardous materials are in Tab C.

- DoD components shall dispose of those categories of hazardous materials listed in Tab B. In addition, the DoD component shall support DLA disposal actions as specified in Tab D.

- The DASD(EES), in coordination with DASD(SM&T) and other OSD offices as necessary, shall formulate, implement, and monitor policy for disposal of hazardous material and shall decide any unresolved issues which may develop, including the reassignment of responsibility for disposal of specific categories of hazardous material when circumstances warrant.

- No other changes are made to the respective disposal mission responsibilities of the DoD components or DLA.

IMPLEMENTATION: This memorandum is effective immediately and should be implemented as rapidly as possible.

- DLA shall make optimum use of existing disposal capabilities and resources.

- DLA shall program for the additional resources required to discharge its responsibilities under this memorandum.

- DLA is directed to organize immediately and chair an inter-service task group to plan actions and milestones for the full implementation of this policy and submit their report to DASD(EES) within 120 days from the date of this memorandum.

- The task group will develop and promulgate a hazardous materials data call to identify current and projected hazardous materials disposal workload, as well as the actions and methodology employed to dispose of those materials. The task group should also identify, in as much detail as possible, the technical support and assistance which can be provided DLA in its efforts to insure expeditious disposal of hazardous materials in an environmentally safe manner. The task group will identify those additional resource requirements which, if made available to DLA, can be effectively applied to expedite hazardous materials disposal during FY 80 and FY 81.

Paul H. Riley
Deputy Assistant Secretary of Defense
(Supply, Maintenance and Transportation)

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

Enclosures:

Tab A - Definitions

Tab B - Materials Assigned to DoD Components for Disposal

Tab C - Responsibilities of DLA for Disposal of Assigned Hazardous Materials

Tab D - Responsibilities of the DoD Components in Support of the DLA Disposal of Hazardous Materials.

DEFINITIONS

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

For the purposes of this memorandum, hazardous materials do not include those radioactive materials that the Nuclear Regulatory Commission controls. Licensees shall be responsible for the disposal of those materials per 10 CFR 20.

Hazardous material may be defined as personal property consisting of items, scrap, and waste:

Items - All unused, used, or contaminated property or combinations of property, (unused, used, mixed or contaminated) which can be identified by a national stock number, manufacturer's part number, military specification number, or locally purchased property with a locally applied stock number. Also, that property which by military regulation requires application of a local stock number prior to disposal.

Scrap - Used or unused property which has no value except for basic material content.

Waste - Used or unused property, residues, by-products, sludges, and other materials, which have no known utility and must, therefore, be discarded.

Conforming storage is a facility or location which conforms to regulations of the Environmental Protection Agency and other regulatory authorities governing the storage of hazardous materials.

The generating activity is an organization or element authorized to turn-in property to the Defense Property Disposal Service.

Materials Assigned to DoD Components for Disposal

DoD components shall be responsible for disposal of the following categories of hazardous materials which have not been assigned to DLA:

1. Toxicological, biological, radiological, and lethal chemical warfare materials which, by U.S. law, must be destroyed. Disposal of the by-products of such material is the responsibility of the DoD component with assistance from DLA.

2. Material which cannot be disposed of in its present form due to military regulations, e.g., consecrated religious items and cryptographic equipment.

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

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

5. Sludges resulting from municipal type wastewater treatment facilities.

6. Sludges and residues generated as a result of industrial plant processes or operations.

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

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

Responsibilities of DLA for Disposal of Assigned Hazardous Materials

Specific DLA responsibilities in this area shall include, but not necessarily be limited to, the following:

1. Accomplish documentation for DLA disposal actions as required under laws and regulations.

2. Initiate contracts or agreements for disposal.

3. Accept accountability for all hazardous materials except those categories specifically excluded in Tab B, which have been properly identified, packaged, labeled, and certified in conformance with established criteria.

4. Accept custody of hazardous materials within the following guidelines:

- If DLA possesses conforming storage at the defense property disposal offices (DPDO), DLA will accept physical custody at the time it accepts accountability.

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

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

- DLA will be responsible for the long term programming of military construction funding for conforming storage in support of its disposal mission.

- If DLA and the component involved cannot mutually agree on the best procedure for storage and handling pending final disposal, the issue shall be referred at once to OASD(MRA&L) for resolution.

5. Provide any required repackaging or handling of hazardous materials subsequent to acceptance of accountability from the generating activity.

6. Establish an inventory control system for the types, quantities, and locations of available hazardous materials for which DLA is responsible in the event that some other activity might be able to use a particular material as a resource.

7. Provide feedback to the military departments and defense agencies on the costs associated with disposal in order that this information might serve as an economic incentive to minimize waste generation.

8. Contract for disposal technology not available in-house or from the DoD components.

9. Minimize environmental risks and costs associated with extended care, handling, and storage of hazardous materials by accomplishing disposal within a significantly compressed disposal cycle. Initiate actions and projects within DoD and in conjunction with federal civil agencies and industry to realize this objective and expedite final disposal.

10. Devise a system by which the time of turn-in will be highly visible on hazardous materials to insure proper application of resources to dispose of these materials. DLA should insure that sufficient disposal capability is programmed to preclude extended delays in the hazardous materials disposal process.

11. Establish and maintain an analysis and information distribution capability to:

- Evaluate the impact and applicability of current technological advances on DoD hazardous material disposal procedures and inform the DoD components of these developments on a continuing basis.

- Assure that the DoD components are apprised, on a continuing basis, of any federal, state, regional, and local regulations being developed to control hazardous material disposal.

12. Become the DoD focal point to recommend to DASD(EES) matters of policy and guidance for hazardous material disposal.

13. Establish procedures relative to assigned responsibility for hazardous material disposal. Unresolved issues will be forwarded to OASD(MRA&L) with appropriate comments.

14. DLA shall program to carry out their responsibilities through normal budgeting channels.

Responsibilities of the DoD Components in Support of the DLA Disposal of Hazardous Materials

1. Where feasible, minimize quantities of hazardous waste through resource recovery, recycling, source separation, and acquisition policies.

2. Provide available technical and analytical assistance, including R&D support, to DLA to accomplish disposal, if requested.

3. Provide all available information to DLA, as required, to complete environmental documentation, e.g., environmental impact statement associated with disposal.

4. Properly identify, package, label, and certify conformance with established criteria prior to transfer of accountability to DLA. Subsequent repackaging or handling is the responsibility of DLA.

5. DoD components will retain custody of hazardous materials within the following guidelines:

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

- In those instances where neither DLA nor the generating activity possesses conforming storage, the activity with the "most nearly" conforming storage will accept/retain custody.

- If DLA and the component involved cannot agree on the best procedure for storage and handling pending final disposal, the issue will be referred at once to OASD(MRA&L) for resolution.

- When a DoD component retains custody of a hazardous material, this hazardous material shall be kept on the accountable records of DLA.

6. When requested, the DoD components will assist DLA by providing information and comments on federal, state, regional, and local regulations being developed to control hazardous material disposal, e.g., ability of particular installations to comply and impact on DoD. The DoD components will alert DLA to any local situation which could impact on hazardous materials disposal.

7. DoD components shall program to carry out their responsibilities through normal budgeting channels.

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ORIGINAL

ACTION

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* U N C L A S S I F I E D *
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PT 00096 196/2001Z PAGE 01

DISTRIBUTION
HS BMO
HS ABMO
MS NREAD
HS Admin D.
Oper D.
M&R D.
Tele D.
Util D.
F&A O.
Prop O.
MME
Maint NCO
Secretary

PRIORITY

//COMM NOTE//
MSG DIST. BY
SSIC (6260)

PTTUZYUW RUEACMC8643 1962001-UUUU--RUEBDOA.
ZNR UUUUU
P R 1415127 JUL 80
FM CMC WASHINGTON DC
TO AIG EIGHT ACT: CG MCB
INFO RUENAAA/CNO WASHINGTON DC
RULSSAA/COMNAVFACENGCOM WASHINGTON DC
RUEPDAB/HQ DPDS BATTLE CREEK MI
RUWDPAA/NAVENVSUPPO PORT HUENEME CA
BT
UNCLAS //N06280// SECTION 01 OF 02
CNO PASS TO OP45. COMNAVFACENGCOM PASS TO 1122
SUBJ: MCBUL 6280. DATA CALL FOR DLA-ASSIGNED HAZARDOUS MATERIALS
CMC CODE LFF
REPORT REQUIRED: DATA CALL (REPORT SYMBOL DD-6240-01) (EXTERNAL REPORT SYMBOL DLA (OTN) 2267 (S)), PAR 3
1. RECENT DEFENSE ENVIRONMENTAL QUALITY PROG POLICY MEMO (DEQPPM) PROVIDED REVISED POLICY GUIDANCE FOR DISPOSAL OF HAZARDOUS MATERIALS. MCBUL DETAILING THIS POLICY TO FOLLOW. IN SUMMARY, WITH EIGHT EXCEPTIONS DESCRIBED IN PARS 2A THRU H, DLA HAS BEEN DESIGNATED THE RESPONSIBLE AGENCY WITHIN DOD FOR WORLDWIDE DISPOSAL OF ALL HAZARDOUS MATERIALS PROPERLY PACKAGED AND IDENTIFIABLE BY

PAGE 02 RUEACMC8643 UNCLAS
NSN'S, MFR'S PART NOS., OR MILSPEC NOS.; LOCALLY PURCHASED PROPERTY WITH LOCALLY ASSIGNED STOCK NOS.; AND THAT PROPERTY WHICH BY MILITARY REG REQUIRES APPLICATION OF LOCAL STOCK NO. PRIOR TO DISPOSAL DLA HAS BEEN DIRECTED TO IMPLEMENT THE NEW DEQPPM AS RAPIDLY AS POSSIBLE. IN ORDER FOR DLA TO PROCEED WITH IMPLEMENTATION, DEFENSE PROPERTY DISPOSAL SERVICE (DPDS) HAS ORGANIZED AN INTERSERVICE TASK GROUP TO PLAN ACTIONS AND MILESTONES REQUIRED IN THE SHORT RANGE. THE TASK GROUP HAS PROMULGATED A DATA CALL TO IDENTIFY CURRENT AND PROJECTED WORKLOAD, TECHNICAL ASSISTANCE, ENVIRONMENTAL DOCUMENTATION AVAILABLE, AND EXISTING CONTRACTUAL EFFORT. THIS BULLETIN DETAILS PART I OF THE DATA CALL AND PROVIDES DEFINITIVE GUIDANCE FOR DISTINGUISHING DLA-ASSIGNED HAZARDOUS MATERIALS FROM SERVICE-ASSIGNED HAZARDOUS MATERIALS. PART II OF THE DATA CALL WILL PROVIDE INSTRUCTIONS REGARDING TURN-IN OF HAZARDOUS MATERIALS. DD FORM 1348-1 WILL BE UTILIZED, AND DLA WILL EXTRACT ADDITIONAL DATA REQUIREMENTS THROUGH THIS DOCUMENT.
2. MATERIAL IS HAZARDOUS WHEN, BECAUSE OF ITS QUANTITY, CONCENTRATION, OR PHYSICAL, CHEMICAL, OR INFECTIOUS CHARACTERISTICS, IT MAY CAUSE OR CONTRIBUTE TO AN INCREASE IN MORTALITY OR SERIOUS ILLNESS OR POSE SIGNIFICANT THREAT TO HUMAN HEALTH OR THE ENVIRONMENT WHEN

PAGE 03 RUEACMC8643 UNCLAS
IMPROPERLY TREATED, STORED, TRANSPORTED, DISPOSED OF, OR OTHERWISE MANAGED. THIS INCLUDES PERSONAL PROPERTY, CONSISTING OF ITEMS,

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SCRAP, AND WASTE. HAZARDOUS MATERIALS DO NOT INCLUDE RADIOACTIVE MATERIALS CONTROLLED BY THE NUCLEAR REGULATORY COMMISSION. ALL HAZARDOUS MATERIALS ARE ASSIGNED TO DLA FOR DISPOSAL EXCEPT THE FOLLOWING, WHICH ARE RETAINED BY THE SERVICES:

A. TOXICOLOGICAL, BIOLOGICAL, RADIOLOGICAL, AND LETHAL CHEMICAL WARFARE MATERIALS WHICH, BY U.S LAW, MUST BE DESTROYED. DISPOSAL OF THE BYPRODUCTS OF SUCH MATERIAL IS THE RESPONSIBILITY OF THE DOD COMPONENT WITH ASSISTANCE FROM DLA.

B. MATERIAL WHICH CANNOT BE DISPOSED OF IN ITS PRESENT FORM DUE TO MILITARY REGULATIONS: E.G., CONSECRATED RELIGIOUS ITEMS AND CRYPTOGRAPHIC EQUIPMENT.

C. MUNICIPAL-TYPE GARBAGE TRASH, AND REFUSE RESULTING FROM RESIDENTIAL, INSTITUTIONAL, COMMERCIAL, AGRICULTURAL, AND COMMUNITY ACTIVITIES WHICH THE FACIL ENGINEER OR PUBLIC WORKS OFFICER ROUTINELY COLLECTS. HAZARDOUS WASTES SHALL NOT BE COMINGLED WITH MUNICIPAL-TYPE GARBAGE AS A SUBTERFUGE FOR AVOIDING HAZARDOUS WASTE REGULATIONS.

D. CONTRACTOR-GENERATED MATERIALS WHICH ARE THE CONTRACTOR'S

PAGE 04 RUEACMC8643 UNCLAS

RESPONSIBILITY FOR DISPOSAL UNDER THE TERMS OF THE CONTRACT.

E. SLUDGES RESULTING FROM MUNICIPAL-TYPE WASTEWATER TREATMENT FACILS. THE TYPE OF SLUDGE GENERATED IN A DOMESTIC SEWAGE TREATMENT PLANT IS DEFINED BY EPA AS A HAZARDOUS WASTE, BUT WILL BE REGULATED IN THE FUTURE BY EPA THROUGH A SPECIAL PROG ENCOMPASSING REGULATORY ELEMENTS OF BOTH THE CLEAN WATER ACT AND RCRA.

F. SLUDGES AND RESIDUES GENERATED AS A RESULT OF INDUSTRIAL PLANT PROCESSES OR OPERATIONS. THIS EXCEPTION REQUIRES CAREFUL EXPLANATION. THE MERE FACT THAT A PARTICULAR MATERIAL WAS INVOLVED IN A GIVEN INDUSTRIAL PLANT PROCESS OR OPERATION DOES NOT AUTOMATICALLY MEAN THAT IT IS A SLUDGE OR RESIDUE. IT MAY BE AN "ITEM" AS DEFINED IN THE NEW DEQPPM. FOR EXAMPLE, CONTAMINATED SOLVENTS USED IN METAL DEGREASING OR USED PLATING SOLUTIONS IN A PLATING SHOP WOULD NOT BE CLASSIFIED AS SLUDGE OR RESIDUE BUT WOULD BE CLASSIFIED AS USED OR CONTAMINATED ITEMS. THE CHEMICAL COMPOSITION OF SLUDGES OR RESIDUES CANNOT BE DETERMINED WITHOUT EXTENSIVE ANALYTICAL CHEMICAL TESTING. SLUDGES AND RESIDUES ARE USUALLY SOLID OR SEMI-SOLID, AND LIQUIDS ARE USUALLY ITEMS. AN ITEM MAY BE USED, MIXED, AND CONTAMINATED AND STILL BE A DLA RESPONSIBILITY, IF IDENTIFIABLE BY NSN'S.

PAGE 05 RUEACMC8643 UNCLAS

G. REFUSE AND OTHER DISCARDED MATERIALS WHICH RESULT FROM MINING, DREDGING, CONSTRUCTION, AND DEMOLITION OPERATIONS.

H. UNIQUE WASTES AND RESIDUES OF NONRECURRING NATURE WHICH RESEARCH AND DEVELOPMENT EXPERIMENTAL PROGS GENERATE.

3. DLA REQ INFO REGARDING PAST AND PRESENT HAZARDOUS MATERIAL DISPOSAL CONTRACTS AND ASSOCIATED ENVIRONMENTAL DOCUMENTATION, ITEM-

PRIORITY

IZED IN PARS 3A THRU E. ADDRESSEES SHALL COLLECT DATA; COORDINATE WITH FMF UNITS, AS APPROPRIATE; AND RPT BY LTR NLT 22 JUL 1980 TO NAVY ENVIRONMENTAL SUPPORT OFFICE, NAVY ENERGY AND ENVIRONMENTAL SUPPORT ACTIVITY (NAVENENVSA) PORT HUENEME, CA 93043. REPORT SYMBOL DD-6240-01 (EXTERNAL REPORT SYMBOL DLA (OTN) 2267 (S)) HAS BEEN ASSIGNED TO THIS REPORT. PROVIDE COPY OF RPT TO CMC (CODE LFF-2). NEG RESPONSES REQUIRED. POINTS OF CONTACT ARE MR. PAUL HUBBELL (HQMC CODE LFF, AUTOVON 224-1425/-3188) AND MR. KARL KNEELING (NAVENENVSA, AUTOVON 360-4062).

A. DISPOSAL CONTRACTS AWARDED DURING FY79 FOR MATERIAL FOR WHICH DLA HAS ACQUIRED RESPONSIBILITY PER NEW DEQPPM.

(1) IDENTIFICATION OF MATERIAL/COMMODITY.

(2) QUANTITY.

B. DISPOSAL CONTRACTS AWARDED OR IN EFFECT DURING FY80 FOR

BT

#8643

NNNN

PTTUZYUW RUEACMC8644 1962001-UUUU--RUEBDOA.
ZNR UUUUU
P R 1415127 JUL 80
FM CMC WASHINGTON DC
TO AIG EIGHT
INFO RUENAAA/CNO WASHINGTON DC
RULSSAA/COMNAVFACENGCOM WASHINGTON DC
RUEBUAG/HQ DPDS BATTLE CREEK MI
RUWDPAA/NAVENVSUPPO PORT HUENEME CA
BT
UNCLAS //N06290// FINAL SECTION OF 02
MATERIAL FOR WHICH DLA HAS ACQUIRED RESPONSIBILITY PER NEW DEQPPM.
(COPIES OF CONTRACTS MAY BE PROVIDED IN LIEU OF INFORMATION IN
PARS 3B(1) THRU (7).)
(1) CONTRACTOR.
(A) LOCATION OF CONTRACTOR'S OFFICE.
(B) LOCATION OF DISPOSAL SITE.
(C) CONTACT POINT.
(D) TELEPHONE NUMBER.
(2) MATERIAL INCLUDED IN CONTRACT TO INCLUDE CONDITION AND
QUANTITY.
(3) COST DATA.

PAGE 02 RUEACMC8644 UNCLAS
(4) RESTRICTIONS IN CONTRACT.
(5) EXPIRATION DATE.
(6) CONTACT POINT IN MILITARY SERVICE.
(7) TRANSPORTATION REQUIREMENTS.
(8) EPA, STATE OR LOCAL CONTACT POINT, IF A PERMIT IS RE-
QUIRED.
(9) DISPOSAL METHOD.
(10) LIST OF UNSUCCESSFUL BIDDERS.
(11) AVAILABLE ENVIRONMENTAL DOCUMENTATION. (PROVIDE COPY.)
(12) HOW TO OBTAIN COPY.
C. CONTRACTS AWARDED IN LAST TWO YEARS OR PRESENTLY IN EFFECT
FOR TECHNOLOGY OR PREPARATION OF ENVIRONMENTAL ASSESSMENTS (EA'S)
OR ENVIRONMENTAL IMPACT STATEMENTS (EIS'S) ON DISPOSAL OF HAZARDOUS
MATERIAL WHICH IS NOW DLA'S RESPONSIBILITY. (COPIES OF CONTRACTS
MAY BE PROVIDED IN LIEU OF INFORMATION IN PARS 3C(1) THRU (6).)
(1) CONTRACTOR.
(A) LOCATION.
(B) CONTACT POINT.
(C) TELEPHONE NUMBER.
(2) DESCRIPTION OF SERVICES TO BE PROVIDED.

PAGE 03 RUEACMC8644 UNCLAS
(3) COST DATA.
(4) RESTRICTIONS IN CONTRACT.

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(5) MILESTONES INCLUDED IN CONTRACT.
(6) CONTACT POINT IN MILITARY SERVICE.
(7) HOW TO OBTAIN COPY.

D. EIS'S OR EA'S PREPARED IN-HOUSE DURING THE PAST TWO YEARS CONCERNING USE OR DISPOSAL OF HAZARDOUS MATERIALS NOW ASSIGNED TO DLA FOR DISPOSAL (COPIES OF EIS'S/EA'S MAY BE PROVIDED IN LIEU OF INFORMATION IN PARS 3D(1) THRU (7).)

(1) NAME OF RESPONSIBLE FEDERAL AGENCY.
(2) WHO PREPARED
(3) DATE OF APPROVAL.
(4) SUBJ OF ENVIRONMENTAL IMPACT STATEMENT OR ENVIRONMENTAL ASSESSMENT.
(5) LOCATION OF ACTION IF SITE SPECIFIC.
(6) WHERE EIS/EA IS FILED.
(7) CONTACT POINT AND TELEPHONE NUMBER
(8) HOW TO OBTAIN COPY.

E. TRANSFORMERS AND DIELECTRIC FLUIDS WAITING LABORATORY TEST FOR PCB CONTENT IN PREPARATION FOR TURN-IN TO DPDO

PAGE 04 RUEACMC8644 UNCLAS

(1) NSN.
(2) QUANTITY AND UNIT OF ISSUE.
(3) LOCATION AND SERVICING DPDO.
(4) TESTING SCHEDULE, IF ANY.

4. THIS BULLETIN CANCELED 31 DEC 1980.
BT
#8644

NNNN

ACT: FAC
INFO: MANP, TRNG, SAFD, CBC, CPO, PWO
NRMC /47

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* U N C L A S S I F I E D *
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PRIORITY

File

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

From: Director, NREA Division
To: Danny
Subj:

1. Does this require another inventory?

Not that ?

I can tell. will have to test and treat them as transformers. JS

ROUTING SLIP

SEP 0 3 1980

	ACTION	INFO	INITIAL
BMO			
ABMO		✓	BWR
ADMIN		✓	
ENVIRON AFF		✓	JDW
F&A BRANCH			
MAINT NCO			
M&R			
OPNS			
PROP			
TELE			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

Maint

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

TELEPHONE NO.
444-4972
AUTOVON 690-4972
IN REPLY REFER TO:

114:PPC
6280

28 AUG 1980

From: Commander, Atlantic Division, Naval Facilities Engineering Command
To: Distribution

Subj: List of known PCB items; transmittal of

Ref: (a) LANTDIVNOTE 6280 of 2 Jul 1980

Encl: (1) List of known PCB items

1. Enclosure (1), which contains a list of PCB items obtained from the Defense Electronic Supply Center, is forwarded for information and use. This list should be added to the list of known PCB items provided in reference (a).

E. A. Barco

E. A. BARCO
By direction

Distribution: (5216.10F CH-1)
Part II
List A (only 7, 11, 13, 15, 16, 17)
List B (only 3)
List F (only 1, 2)
List G (only 2)
List I (only 3, 5, 7)
List K (only 6)
List L (only 1)
List M (only 2)
List S (only 3, 6)
Part III
List A (only 3, 5, 11, 14, 16, 17, 18, 24)
List B (only 5, 9, 12, 14, 16)
List G (only 6, 7.a.)
List H (only 1)
AFXTRACTY CAMP PEARY
ABL CUMBERLAND
NAS BERMUDA ANNEX
NAVCOMMU NEA MAKRI GREECE

Copy to:
Part I
List A (only 17, 18)
Part II
List A (only 12)
Part III
List B (only 1)

PCB ITEMS

I. FSC 5910, LARGE HIGH VOLTAGE CAPACITORS identified as containing three lbs. or more of Polychlorinated Biphenyls (PCBs) oils and operating at 2000 volts A.C. or more:

NSN	P/N	NSN	P/N
5910-00-027-0825*	51F221AC	5910-00-614-4421	14F396
5910-00-050-7636*	14F736	5910-00-626-2342	14F1410
5910-00-062-5683	18F75G2/4/2/15C	5910-00-666-7389	TK70040PORM10PC
5910-00-070-4730	TK0107	5910-00-679-2007	TKB168
5910-00-078-6844	14F1342	5910-00-686-8757	P20J227
5910-00-083-8515*	23F1081G202	5910-00-781-3153	17F455
5910-00-112-6808	TK15030	5910-00-814-3157	17F198G3
5910-00-113-9966*	702013/6201	5910-00-834-6211	710601
5910-00-113-9967*	702013/6204	5910-00-837-5188	930/0712/00
5910-00-116-2401	14F1411G102	5910-00-896-4183	18F58
5910-00-116-8691	14F1403G102	5910-00-901-1087	17F841K
5910-00-128-3233	14F68DWGM746772	5910-00-904-8838	TK125W2T
5910-00-161-6869	PC2151/1	5910-00-904-8839	P20J280
5910-00-166-8997	14F1362	5910-00-914-0493	TK150P5R
5910-00-187-4012	14F52	5910-00-922-8374*	19F142XB
5910-00-188-1447	TK20020	5910-00-923-8734	18F613
5910-00-198-9779	P20J/399	5910-00-939-4318	19F405
5910-00-235-8661	TK200200	5910-00-950-9825	TK187
5910-00-254-2566	14F496	5910-00-961-6014	17F366
5910-00-265-2570	P20J296	5910-00-983-5209	14F1055
5910-00-465-2278*	TKM100W15	5910-00-984-6135	14F1011
5910-00-465-2279*	TKM8125W15	5910-00-984-6136	17F375G2
5910-00-465-2282*	TKM200W5	5910-00-999-2414*	14F1056G4
5910-00-466-2246*	TKM250W5P5		
5910-00-472-4476	11227153		
5910-00-476-6656*	TKB187		
5910-00-487-7567	17F470	5910-01-005-1955	14F1467
5910-00-491-2597	14F1359??	5910-01-025-5702	1451515
5910-00-552-8859	P20J299	5910-01-020-3270	TK3210
5910-00-610-2423	14F669G2	5910-01-029-5378	14F151702

ENCLOSURE 1

PCB ITEMS

FSC, 5910 LARGE LOW VOLTAGE CAPACITORS identified as containing three lbs. or more of PCBs oils and operating at less than 2000 volts A.C.:

NSN	P/N	NSN	P/N
5910-00-350-1997	702013/3107	5910-00-552-0336	18F74

*Items not DESC managed

II. FSC 5915, FILTER/NETWORKS identified as containing more than three lbs. of PCBs:

NSN	P/N	NSN	P/N
5915-00-021-8796	GFP6425-4X30B	5915-00-478-0947	GF6425-3X30D
5915-00-036-9053	FSRG25B4	5915-00-831-8967	FSRX100B3N
5915-00-192-2676**	---	5915-00-922-9143	FSRW50B2
5915-00-192-2876**	---	5915-00-922-9144	FSRW50B3
5915-00-473-2104	GF6425-3X50D	5915-00-922-9145	FSRW50B3N
5915-00-473-2106	GF6425-2X200DGN	5915-00-922-9146	FSRW50B4
5915-00-473-2110	GF6425-4X50D	5915-00-922-9148	FSRW100B4
5915-00-473-2111	GF6425-3X100D	5915-00-922-9149	FSWR150B4
5915-00-473-2112	GF6425-4X100D	5915-00-943-8530	FSWR200B3N
5915-00-473-2113	GF6425-3X200DGN	5915-00-944-7670	FSRW25B2
5915-00-473-2116	GF6425-30DGN	5915-00-947-0447	FSRW25B3
5915-00-473-2125	GF6425-2X30D	5915-00-947-0448	FSRW25B4
5915-00-473-2126	GF6425-4X30D	5915-00-034-3494	FSR/W100B3N

**Contents unknown

PCB ITEMS

III. FSC 5950, TRANSFORMERS/REACTORS identified as containing PCBs; quantity unknown:

NSN	P/N
5950-00-073-5094	---
5950-00-080-3037	---
5950-00-138-4937	---
5950-00-188-4159	---
5950-00-243-5470	
5950-00-249-1615	---
5950-00-256-8754	---
5950-00-295-7504	---
5950-00-295-7535	---
5950-00-295-7642	---
5950-00-349-0508	---
5950-00-409-7368	---
5950-00-420-3536	---
5950-00-433-5456	---
5950-00-470-1429	---
5950-00-509-8456	---
5950-00-510-4657	---
5950-00-532-1179	---
5950-00-538-2249	---
5950-00-556-9773	---
5950-00-561-6733	---
5950-00-577-9288	---

NSN	P/N
5950-00-645-4860	---
5950-00-645-5022	---
5950-00-645-5319	---
5950-00-646-2155	---
5950-00-648-3754	---
5950-00-681-1832	---
5950-00-728-0858	---
5950-00-735-9108	---
5950-00-778-7322	---
5950-00-779-0047	---
5950-00-784-6078	---
5950-00-787-0221	---
5950-00-795-2689	---
5950-00-808-4417	---
5950-00-815-6691	---
5950-00-818-3216	---
5950-00-833-8058	---
5950-00-841-4385	---
5950-00-853-0696	---
5950-00-897-9685	---
5950-00-944-1747	---
5950-00-972-5458	---
5950-00-952-1683	---

NOTE: The PCB transformers listed above are hermetically sealed units.

ROUTING SLIP SEP 1 6 1980

	ACTION	INFO	INITIAL
BMO		✓	1-3
ABMO		✓	S
ADMIN			BdW
ENVIRON AFF	✓		
F&A BRANCH			
MAINT NCO			
M&R			
OPNS			
PROP			
TELE			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

Danny,
Does included tenant upkeep
work Station right?

Julie

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 15 Sep 88

TO:

[BASE MAINT O]
PUBLIC WORKS O
COMM-ELECT O
MOTOR TRANSPORT O

DIR, QUARTERS & HOUSING
DIR, BOQ/BSQ
BASE FIRE CHIEF

ATTN: _____

1. Attached is forwarded for ~~info~~/action.

Please advise impact. Did we include them? Does this affect MCAS (H) New River?

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

3. Your file copy

K.P. Millis J

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

6240

****
PRIORITY * U N C L A S S I F I E D *
****
PT 00340 256/1932Z

PRIORITY PAGE 01

PTTUZYUW RUEACMC6336 2561928-UUUU--RUEBDOA.
ZNR UUUUU
P R 121506Z SEP 80
FM CMC WASHINGTON DC
TO AIG EIGHT //ACT: OC NCB//
INFO RUENAAA/CNO WASHINGTON DC
RULSNDA/COMNAVFACENGCOM WASHINGTON DC
RUEBUAB/HQ DPDS BATTLE CREEK MI
RUWDPAA/NAVENENVSUPPO PORT HUENEME CA
BT

ORIGINAL
ACTION

UNCLAS //N06280//
CNO PASS TO OP45. COMNAVFACENGCOM PASS TO 1122
SUBJ: MCBUL 6280. RESOURCE CONSERVATION AND RECOVERY ACT NOTIFICATION TO EPA
(CMC CODE LFF-2)
A. MCBUL 6280 OF 1 MAY 1980
1. QUESTIONS HAVE BEEN RAISED WHETHER MARINE CORPS ACTIVITIES SHOULD HAVE INCLUDED HAZARDOUS WASTE OPERATIONS OF ALL TENANT ACTIVITIES IN THE "NOTIFICATION OF HAZARDOUS WASTE ACTIVITY" PACKAGE REQD BY ENVIRONMENTAL PROTECTION AGENCY (EPA) ON 18 AUG 1980 AND SUBMITTED IAW THE REF. DOD RESOLVED THIS MATTER BY POLICY MEMO OF 14 AUG 1980. TENANT ACTIVITIES, INCLUDING TENANTDEFENSE PROPERTY

PAGE 02 RUEACMC6336 UNCLAS
DISPOSAL OPERATIONS, WERE TO BE PART OF ACTIVITY NOTIFICATION.
2. IF NOTIFICATION TO EPA DID NOT INCLUDE ALL TENANT OPERATIONS, SUCH NOTIFICATION SHALL BE AMENDED IMMEDIATELY BY SUBMITTING A REVISED "NOTIFICATION OF HAZARDOUS WASTE ACTIVITY" FORM WITH BLOCK VIII B (SUBSEQUENT NOTIFICATION) CHECKED. ANY SUBSEQUENT NOTIFICATION SHALL BE SUBMITTED VIA THE COGNIZANT NAVFACENGCOM EFD.
3. THIS BULLETIN IS APPLICABLE TO THE MCR.
4. THIS BULLETIN CANCELED 31 DEC 1980.
BT
#6336

NNNN

ACT:FAC /34
INFO:TRNG,C:C, ADJ
NRMC

****
PRIORITY * U N C L A S S I F I E D *
****
121506Z Sep 80

C/S

PRIORITY

PRIORITY

****
* U N C L A S S I F I E D *
****

PT 00321 255/2052Z

PAGE 01

DISTRIBUTION
BMO
ABMO
UNREAD
3 Admin D.
Oper D.
M&R D.
Tele D.
Util D.
F&A O.
Prop O.
MME
Maint NCO
Secretary

984

PTTUZYUW RULYSGG6398 2552046-UUUU--RUEBDOA.
ZNR UUUUU
P 101746Z SEP 80
FM LANTNAVFACENGCOM NORFOLK VA
INFO ZEN/COMNAVBASE NORFOLK VA
ZEN/PWC NORFOLK VA
RUEBBSA/NSC NORFOLK VA
RUEBNUD/NSC CHEATHAM ANNEX WILLIAMSBURG VA
RUEBLBA/NAVSHIPYD NORFOLK VA
ZEN/NAVCAMS LANT NORFOLK VA
RUEDEOA/NAVORDSTA LOUISVILLE KY
RUEOALA/NAS NORFOLK VA
RUEBNUY/WPNSTA YORKTOWN VA
RUEBEDA/FLECOMBATRACENLANT VIRGINIA BEACH VA
ZEN/NAVPHIBASE LITTLE CREEK VA
RUEBLBA/NAVREGMEDCEN PORTSMOUTH VA
RUSKSDE/NAVSECGRUACT NORTHWEST VA
RUEBDOA/CG MCB CAMP LEJEUNE NC
RUCLFCA/CG MCAS CHERRY PT NC
RUEBNMA/MCAS H NEW RIVER NC
RULGSAA/NAVSTA ROOSEVELT ROADS PR
RUEBNUW/AFXTRACTY CAMP PEARY WILLIAMSBURG VA

PAGE 02 RULYSGG6398 UNCLAS
RULGSDG/RESUPSHIP SAN JUAN PR
RUEBLJA/NAVRESCEN BALTIMORE MD
RUEBPAA/ALLEGHENY BALLISTICS LABORATORY
P.O. BOX 210
CUMBERLAND MD
RUEBEDA/NAS OCEANA VA
RUQISDE/NAVSECGRUACT SABANA SECA PR
RUCLFCG/NAVAIREWORKFAC CHERRY PT NC
RUEOALA/NAVAIREWORKFAC NORFOLK VA
RULGSAA/LANTNAVFACENGCOMBRO ROOSEVELT ROADS PR
P 182032Z AUG 80
FM CNO WASHINGTON DC
TO CNR WASHINGTON DC
CHNAVMAT WASHINGTON DC
CHNAVPERS WASHINGTON DC
CINCPACFLT PEARL HARBOR HI
COMNAVSECGRU WASHINGTON DC
CNAVRES NEW ORLEANS LA
CNET PENSACOLA FL
NAVCOMPT WASHINGTON DC

PAGE 03 RULYSGG6398 UNCLAS
BUMED WASHINGTON DC
CINCLANTFLT NORFOLK VA

101746Z Sep 80

COMNAVOCEANCOM BAY ST LOUIS MS
COMNAVTELCOM WASHINGTON DC
COMNAVINTCOM WASHINGTON DC
INFO CMC WASHINGTON DC
HQS DPDS BATTLE CREEK MI
COMNAVFACENGCOM ALEXANDRIA VA
NORTHNAVFACENGCOM PHILADELPHIA PA
SOUTHNAVFACENGCOM CHARLESTON SC
NAVENENSA PORT HUENEME CA
DLA OW CAMERON STATION VA
CHESNAVFACENGCOM WASHINGTON DC
LANTNAVFACENGCOM NORFOLK VA
PACNAVFACENGCOM PEARL HARBOR HI
WESTNAVFACENGCOM SAN BRUNO CA
BT
UNCLAS //N06240//
SUBJ: RCRA NOTIFICATION TO EPA
A. CNO WASHINGTON DC 231918Z JUN 80

PAGE 04 RULYSG6398 UNCLAS
B. DASD(E,E&S) MEMO OF 14 AUG 80 NOTAL
1. REF A PERTAINS.
2. THERE HAVE BEEN QUESTIONS WHETHER NAVY ACTIVITIES SHOULD INCLUDE HAZARDOUS WASTES OPERATIONS OF TENANT ACTIVITIES IN THE "NOTIFICATION OF HAZARDOUS WASTES ACTIVITY". DEPARTMENT OF DEFENSE HAS RESOLVED THE MATTER IN REF B. TENANT ACTIVITIES SHALL BE INCLUDED. THIS INCLUDES TENANT DEFENSE PROPERTY DISPOSAL OPERATIONS.
3. IF NOTIFICATION TO EPA REGIONS HAS ALREADY BEEN MADE WITHOUT INCLUDING TENANT OPERATIONS, IT SHALL BE AMENDED BY SUBMITTING A REVISED "NOTIFICATION OF HAZARDOUS WASTE ACTIVITY" FORM WITH BLOCK VIII B "SUBSEQUENT NOTIFICATION" CHECKED.
BT
#6398
INFO: TRNG, CBC
NNNN NRMC /16

FAC action

ROUTING SLIP

AUG 13 1980

	ACTION	INFO	INITIAL
BMO			
ABMO		✓	BWR
ADMIN		✓	
ENVIRON AFF		✓	JdW
F&A BRANCH			
MAINT NCO			
M&R			
OPNS			
PROP			
TELE			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

Danny
Note + Return DOS
JdW

Encl (1)

MEMO ROUTING SLIP	NEVER USE FOR APPROVALS, DISAPPROVALS, CONCURRENCES, OR SIMILAR ACTIONS	ACTION
1 TO COMMANDING GENERAL MCB, CLNC	INITIALS / DATE	CIRCULATE / COORDINATION
2 ATTN: BASE MAINTENANCE OFFICER		FILE / INFORMATION
3		NOTE AND RETURN / PER CONVERSATION
4		SEE ME / SIGNATURE

REMARKS

For your information per instructions DPDR-MR 232-80 MSG.

FROM: Mr. King - DPDO-2 Ext 5613

DATE: 8/4/80

PHONE: 5613

DD FORM 1 OCT 60 95
0102-000-6500

REPLACES DD FORM 94, 1 FEB 50 AND DD FORM 95, 1 FEB 58 WHICH WILL BE USED UNTIL EXHAUSTED.

ENCLOSURE (1)

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, place it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F | T/A: 1 | APPROVED | DATE RECEIVED (yr., mo., & day)

I. NAME OF INSTALLATION

DEFENSE PROPERTY DISP OFFICE LEJEUNE

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 BLDG 906

CITY OR TOWN: 4 CAMP LEJEUNE | ST.: NC | ZIP CODE: 28542

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 BLDG 906

CITY OR TOWN: 6 CAMP LEJEUNE | ST.: NC | ZIP CODE: 28542

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 KING MARVIN J PROP DISP OFF

PHONE NO. *(area code & no.)*: 919-451-5613

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 DEPARTMENT OF DEFENSE

DETACH

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

F

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

CONTINUE ON REVERSE

S												T/A	C
W													1
1	2	-								13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001) [X] 2. CORROSIVE (D002) [X] 3. REACTIVE (D003) [X] 4. TOXIC (D000)

DETACH A

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

DETACH A

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	M. J. KING, PROPERTY DISPOSAL CHIEF	7/17/80

CZCREA390
RITUZYUW RUCLFTA5683 2182012-UUUU--RUCLBRA. AUG 5 20 29.80
ZNR UUUUU
R 052035Z AUG 80
FM DPDR COMDR MEMPHIS TN
TO AIG 4544 //ACT: DPDO//
BT
UNCLAS DPDR-MR 232-80 PASS TO DEFENSE PROPERTY DISPOSAL OFFICES
SUBJECT: COMPLIANCE WITH RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) NOTIFICATION REQUIREMENTS
1. REFERENCE DPDR-MR LETTER 9 JUL 80, SUBJECT: RESOURCE CONSERVATION AND RECOVERY ACT OF 1976.
2. AT THE MONTHLY ENVIRONMENTAL QUALITY MEETING HELD BY THE DEPUTY ASSISTANT SECRETARY OF DEFENSE (EE&S) 0 8 JULY 80, DPDS WAS INFORMED OF A DECISION MADE BY MR. MARIENTHAL THAT THE INSTALLATION COMMANDER IS THE RESPONSIBLE OFFICIAL REGARDING COMPLIACE WITH RCRA NOTIFICATION PROCEDURES. THEREFORE, ALL TENANT (DPDO'S) ACTIVITIES SHOULD REPORT THEIR POTENTIAL GENERATIONS OF HAZARDOUS WASTE TO THE HOST INSTALLATION COMMANDER FOR INCLUSION ON THE HOST NOTIFICATION FORM.
3. IN VIEW OF THE ABOVE, TAKE IMMEDIATE ACTION TO REPORT YOUR POTENTIAL HAZARDOUS WASTE GENERATIONS

PAGE 2 RUCLFTA5683 UNCLAS
TO THE INSTALLATION COMMANDER. YOU MAY WISH TO CONSIDER USING THE SAME NOTIFICATION PACKET YOU ORIGINALLY PREPARED AND FORWARD TO DPDS-LPE AS A VEHICLE FOR INFORMING THE HOST INSTALLATION.
4. IT IS OUR UNDERSTANDING THAT A PROPOSED WRITTEN POLICY IS IN FINAL DRAFT STAGE AT DASD (EE&S). HOWEVER, SINCE TIME IS OF ESSENCE, PROCEED IMMEDIATELY TO INTERFACE WITH THE INSTALLATION COMMANDER.
BT
#5683

TOR: 052029z AUG80/46
DPDO

NNNN

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

MAIN/JIW/th
6240
SEP 2 3 1980

From: Base Maintenance Officer
To: Assistant Chief of Staff, Facilities

Subj: Resource Conservation and Recovery Act; required notification to EPA

Ref: (a) AC/S FAC memo of 15 Sep 1980
(b) FONECON btwn Mr. M. King, DPDO, and Mr. D. Sharpe, BMaintDept, on 22 Sep 1980
(c) DPDO memo of 8 Aug 1980

1. This letter is in reply to reference (a). The issues addressed in the CMC message will have minimal impact on the base efforts to implement the subject program. The Marine Corps Air Station (H), New River, EPA notification included all known wastes from Air Station tenant organizations. The Marine Corps Base notification to EPA included all wastes generated by Marine Corps Base, Marine Corps Base tenants, Marine Corps Air Station (H), New River and Marine Corps Air Station (H), New River tenants.

2. In addition, the local Defense Property Disposal Officer advised during reference (b) that information provided in reference (c) indicating that the Defense Property Disposal Office generated no hazardous wastes other than those received from Marine Corps Base and Marine Corps Base tenants. Mr. King advised that, technically, the local Defense Property Disposal Office is subject to receiving property for disposal from any DOD agency. Accordingly, it is recommended that Defense Property Disposal Office be formally advised that hazardous materials or wastes other than those generated by base, base tenants, Marine Corps Air Station (H), New River and Air Station tenants may not be brought aboard base or be disposed of under the Hazardous Waste Activity Identification Number assigned to base by EPA without the express written approval of the Commanding General, Marine Corps Base.

B. W. ELSTON
Acting

MAIN/JIW/th
6240

SEP 2 3 1980

From: Base Maintenance Officer
To: Assistant Chief of Staff, Facilities

Subj: Resource Conservation and Recovery Act; required notification to EPA

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(c) DPDO memo of 8 Aug 1980

1. This letter is in reply to reference (a). The issues addressed in the CMC message will have minimal impact on the base efforts to implement the subject program. The Marine Corps Air Station (H), New River, EPA notification included all known wastes from Air Station tenant organizations. The Marine Corps Base notification to EPA included all wastes generated by Marine Corps Base, Marine Corps Base tenants, Marine Corps Air Station (H), New River and Marine Corps Air Station (H), New River tenants.

2. In addition, the local Defense Property Disposal Officer advised during reference (b) that information provided in reference (c) indicating that the Defense Property Disposal Office generated no hazardous wastes other than those received from Marine Corps Base and Marine Corps Base tenants. Mr. King advised that, technically, the local Defense Property Disposal Office is subject to receiving property for disposal from any DOD agency. Accordingly, it is recommended that Defense Property Disposal Office be formally advised that hazardous materials or wastes other than those generated by base, base tenants, Marine Corps Air Station (H), New River and Air Station tenants may not be brought aboard base or be disposed of under the Hazardous Waste Activity Identification Number assigned to base by EPA without the express written approval of the Commanding General, Marine Corps Base.

B. W. ELSTON
Acting

SEP 2 3 1980

ROUTING SLIP

SEP 0 4 1980

	ACTION	INFO	INITIAL
BMO			
ABMO		✓	BWR
ADMIN		✓	
ENVIRON AFF		✓	JdW
F&A BRANCH			
MAINT NCO			
M&R			
OPNS			
PROP			
TELE			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

Danny
Note & Return

Julian, I suggest action be initialed to get a training session here and use of Maint Div. Carpenters. JdW

DS

ASSISTANT CHIEF OF [redacted]FF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 9-4-80

TO:

[BASE MAINT O] DIR, FAMILY HOUSING

PUBLIC WORKS O DIR, BACHELOR HOUSING

COMM-ELECT O BASE FIRE CHIEF

MOTOR TRANSPORT O

ATTN: NREA DIV

1. Attached is forwarded for info/action

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

3. Your file copy.

V/R

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

P-MCBCL-1757

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

TELEPHONE NO.
444-4903
AUTOVON 690-4903
IN REPLY REFER TO:

114:WLC
6280

25 AUG 1980

From: Commander, Atlantic Division, Naval Facilities Engineering Command
To: Distribution

Subj: Hazardous Materials Training Courses

Ref: (a) OPNAVINST 6240.3E
(b) MCO P11000.8
(c) OPNAV NOTICE 6240 of 20 Feb 1980
(d) Federal Register, Volume 45 FR 33066 of 19 May 1980

Encl: (1) Course brochure/enrollment information

1. Enclosure (1) forwards current information concerning training courses on the latest techniques of hazardous material waste management and control as required per references (a) and (b). This Command strongly recommends that activity personnel take advantage of these courses designed to keep individuals abreast of new developments in regulatory requirements of the Resource Conservation and Recovery Act (RCRA) in accordance with references (c) and (d).

2. Should there be questions regarding registration, please contact Dr. Thomas H. F. Smith, Director, Environmental Resources Group, IMS America, LTD., Ambler, Pennsylvania 19002, telephone (215) 643-0400, Extension 546.

3. Funding for registration fees is available from LANTNAVFACENGCOM. Travel and per diem costs in connection with this training are, however, the responsibility of the activity. Questions regarding status of approval and funding should be directed to Mr. W. Carter, Code 114, by calling AUTOVON 690-4903 or commercial (804) 444-4903.

E. A. Barco

E. A. BARCO
By direction

Distribution:
PWC NORFOLK
NAVAIREWORKFAC NORFOLK
NAVAIREWORKFAC CHERRY POINT
NORFOLKNAVSHIPYD
NAVORDSTA LOUISVILLE
NAVWPNSTA YORKTOWN
NAS OCEANA

Distribution (continued)
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NAVCAMS LANT NORFOLK
NAS NORFOLK
NAVSTA NORFOLK
NAVREGMEDCEN PORTSMOUTH
NAVSECGRUACT NORTHWEST
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MCAS CHERRY POINT
NRL BALTIMORE
NAVSTA ROOSEVELT ROADS
NAVSECGRUACT SABANA SECA
MCAS (H) NEW RIVER
SIMA NORFOLK
SIMA NAVAIRLANT NORFOLK
SIMA LITTLE CREEK
RESUPSHIP SAN JUAN PR

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COMTACWINGSLANT OCEANA
NAVENVIRHLTHCEN NORFOLK
NAVENENVSA PORT HUENEME
ABL CUMBERLAND

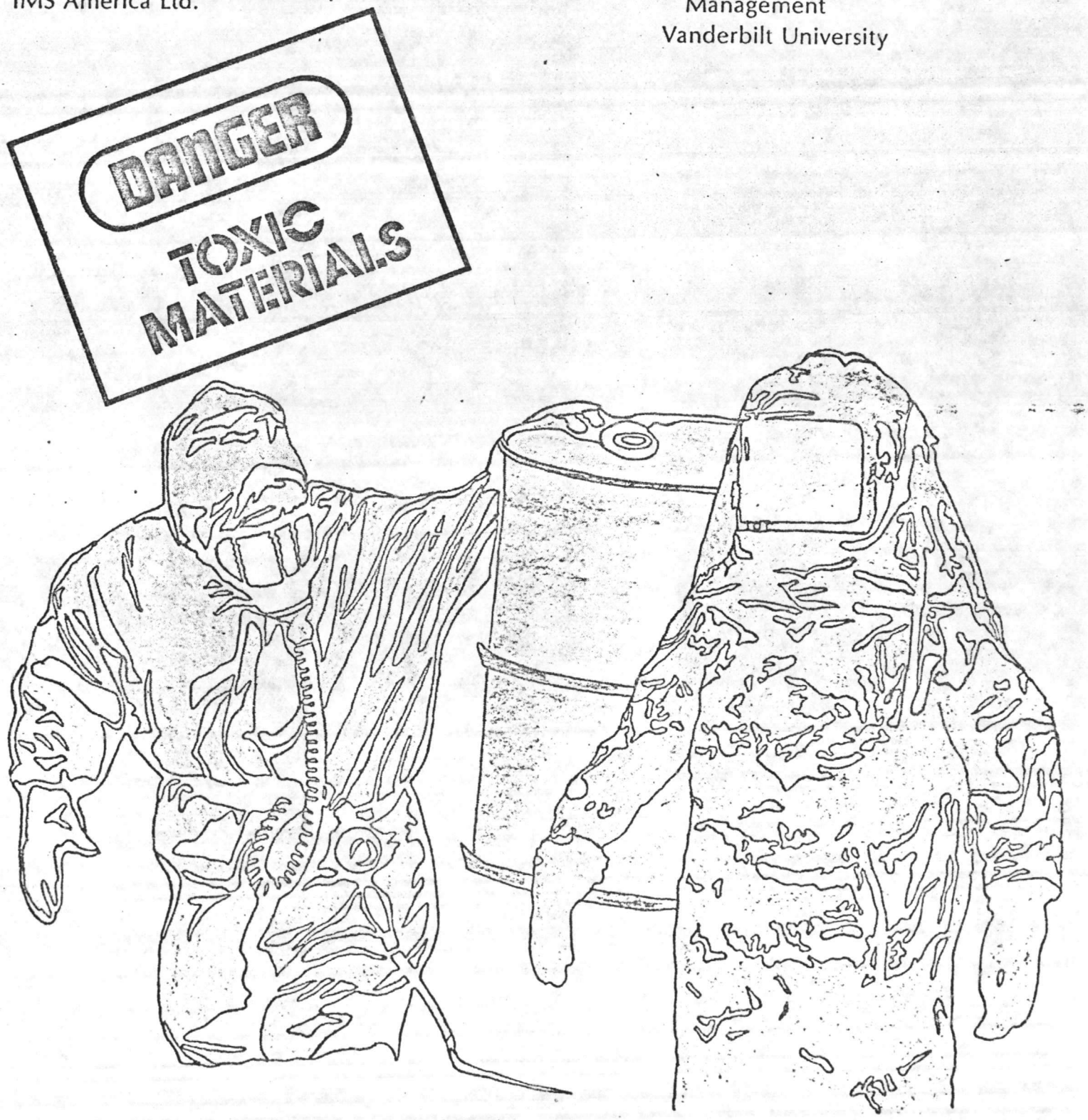
HAZARDOUS MATERIALS TRAINING COURSES

PRESENTED JOINTLY BY

Environmental Resources Group
Health Care Services Division
IMS America Ltd.

and

Toxic Substances Control Laboratory
Center for Environmental Quality Management
Vanderbilt University



Hidden Problems . . . Tough New Regulations . . . Corporate Risks

To provide answers to these and other significant questions . . . to keep you abreast of developments in legislation, regulations, and guidelines . . . to acquaint you with the tough, new requirements of recent TSCA and RCRA legislation . . . to assist you in administering the laws or complying with them . . . to provide you with current information on the latest techniques of hazardous material/toxic substance management and control, four new courses have been designed to meet your needs.

Mounting public awareness of the potentially harmful or dangerous impact of many modern chemical substances has, in recent years, spawned new laws, new regulations, new government agencies, new plans, and new programs . . . all designed to counteract these new-found hazards and to protect our lives and our environment.

These developments are designed to protect mankind and to insure the survival of our environment, but they also present urgent, new considerations and challenges to both industry and government and raise a host of pressing questions for all concerned:

- How can we protect employees from hazardous materials, accidents and exposure?
- Will Federal and State hazardous materials regulations impact our operations?
- Where and how can we get immediate help with a hazardous material emergency?
- What is the best protective clothing?
- What is the extent of corporate responsibility in disposing of hazardous wastes?
- How can my company comply with new Federal laws without going bankrupt?
- Are corporate employees and officers subject to fines or imprisonment?
- How can we untangle new regulations and assess our risk?
- Are we using or producing hazardous or toxic substances without our knowledge?
- How can we minimize the risks of shipping hazardous materials?

THE FOUR NEW COURSES NOW BEING OFFERED

COURSE NO. 1
- HAZARDOUS MATERIALS TRAINING

COURSE NO. 2
- HAZARDOUS WASTE MANAGEMENT

COURSE NO. 3
- INDUSTRIAL TOXICOLOGY

COURSE NO. 4
- NEW ASPECTS OF TOXIC SUBSTANCES CONTROL ACT

A complete schedule of dates and locations is provided on the back cover

COURSE NO. 1. HAZARDOUS MATERIALS TRAINING

This seminar was originally developed in conjunction with the U.S. ENVIRONMENTAL PROTECTION AGENCY. It has been used to train EPA On-Scene Coordinators of Hazardous Materials Spills and U.S. Coast Guard and Navy personnel.

The Seminar will consist of lectures, discussion, and problem solving sessions in the area of the CHEMISTRY, HEALTH HAZARDS, AND CONTROL of hazardous materials, with emphasis on the current state-of-the-art.

COURSE CONTENT

- **INTRODUCTION AND COURSE OVERVIEW**
- **CHEMISTRY OF HAZARDOUS MATERIALS**
  Classification . . . Physical Properties/Reactivity . . . Hazards/Explosions
- **HEALTH HAZARDS**
  Toxicology . . . Toxicity Classification . . . Dose, Time Effect Relationships . . . Signs, Symptoms of Intoxication
- **RESPONSE TO HAZARDOUS MATERIALS SPILLS**
  Federal Regulations . . . Field Chemistry/Engineering Principles
- **INFORMATION SYSTEMS AND NATIONAL RESPONSE ASSISTANCE**
  Chemtrek/NACA . . . Federal Systems (OHM-TADS and CHRIS) . . . Obtaining Information . . . Assistance for Spills
- **PREPARATION OF CONTINGENCY PLANS AND SPCC PLANS**
- **TREATMENT AND CLEAN-UP TECHNIQUES FOR SPILLS**
  Containment . . . Neutralization and Stabilization . . . In Situ Treatment Versus Transportation to Fixed Facilities . . . Control and Organization Procedures . . . Clean-Up Equipment and Techniques . . . Removal . . . Repackaging
- **PROBLEMS AND EXERCISES**
- **PERSONAL SAFETY AND PROTECTIVE EQUIPMENT**
  Protective Clothing . . . Breathing Devices . . . Cost and Availability
- **TRANSPORT OF HAZARDOUS MATERIALS**
  DOT Marking System . . . Shipping Containers and Vehicle Requirements . . . Shipper, Transporter and Consignee Regulations and Responsibilities
- **ENVIRONMENTAL MONITORING AND MODELING DYNAMICS**
  Identification Instrumentation . . . Analytical Procedures . . . Air, Water, and Land Dispersion Modeling . . . Retention and Biodegradation . . . Geology and Ground Water Hydrology . . . Air and Water Standards Compliance . . . Bioassays
- **ULTIMATE DISPOSAL OF HAZARDOUS MATERIALS**
  Methods of Disposal . . . Selection and Operation of Disposal Sites . . . New Developments and Research Techniques
- **FIRST AID FOR HAZARDOUS EMERGENCIES**
- **PROBLEMS AND EXERCISES**
- **FEDERAL AND STATE LAWS**
  Federal Regulations . . . Responsibilities Imposed on States . . . Responsibilities of Producers, Shippers and Disposers . . . Enforcement and Liability
- **SUMMARY AND CONCLUSION**

CERTIFIED BY THE AMERICAN BOARD OF INDUSTRIAL HYGIENE
FOR 3 CREDITS FOR MAINTENANCE OF CERTIFICATION

COURSE NO. 2. HAZARDOUS WASTE MANAGEMENT
The Resource Conservation Recovery Act (RCRA)

This is a new course designed specifically for representatives of industry and government interested in an indepth understanding of the hazardous waste management requirements of the Resource Conservation and Recovery Act (RCRA). This new law proposes "to promote the *Protection of Health and the Environment* and to conserve valuable materials and energy resources by regulating the *Treatment, Storage, Transportation,* and *Disposal of Hazardous Wastes* which have *Adverse Effects* on health and the environment" [Section 1003(4)].

The following goals will be addressed in this course.

- To familiarize participants with RCRA regulatory guidelines regarding hazardous waste management
- To explore state-of-the-art principles, concepts, and techniques for hazardous waste handling and disposal
- To review cost-effective approaches for compliance with RCRA and methods to reduce corporate risk
- To identify solutions to particular corporate waste management and disposal problems testing, designation, transportation, recovery and disposal manifests

COURSE CONTENT

- **INTRODUCTION AND COURSE OVERVIEW**
- **RCRA DEFINITION OF HAZARDOUS WASTES**
  Characteristics/Tests/Waste Lists . . . Determination of Inclusion in List . . . Certification of Determination/Non-Regulated Wastes . . . Human Health and Environmental Standards
- **REQUIREMENTS FOR GENERATORS OF HAZARDOUS WASTES**
  The Manifest: Reporting and Record-Keeping . . . Containers and Labeling . . . Confidential Information
- **STANDARDS FOR TRANSPORTERS OF HAZARDOUS WASTES**
  Compliance with EPA Manifest System . . . Reporting and Record-Keeping: Preparation for . . . Transportation . . . Spills/Container Reuse . . . State Regulatory Program/Standards for Storage
- **STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE MANAGEMENT FACILITIES**
  Proposed Regulations/Operation and Design Manuals . . . Interim Status Standards/Closure and Post-Closure . . . General Facility Standards and Site Selection . . . Security, Contingency Plan and Emergency Procedures . . . Manifest Record-Keeping and Reporting/Financial Responsibility . . . Liability for Generators, Transporters, and Disposers
- **REGULATORY CONTROL**
  Inspections: Groundwater and Leachate Monitoring . . . Financial Requirements: Closure—Post Closure . . . NPDES Permit/RCRA Integration with Other Acts . . . Best Available Technology and Pretreatment Standards . . . Clean Air and Water Act/TOSCA
- **TREATMENT AND DISPOSAL**
  Incineration/Landfills/Landfarming . . . Basin and Surface Impoundments Selection and Operation of Disposal Sites . . . New Developments and Research
- **TREATMENT AND DISPOSAL**
  Chemical—Physical—Biological—Special Wastes . . . Underground Injection and Ocean Disposal
- **NOTIFICATION REQUIREMENTS FOR HAZARDOUS WASTE MANAGEMENT ACTIVITIES**
  Legal Requirements and Permit Applications . . . Active and Inactive Facilities
- **FEDERAL AND STATE AUTHORIZATION AND PERMITS**
  Authorization of State Hazardous Waste Programs . . . Federal Oversight of State Hazardous Waste Programs
- **UNCONTROLLED WASTE SITES**
  Problems encountered when dealing with orphan or abandoned sites, where no information as to contents or origins is available.

Consultation will be available from lecturers throughout the seminar to assist participants with particular problems in the topic areas. The seminar encourages an atmosphere which maximizes interaction between faculty and participants.

WHO SHOULD ATTEND

PERSONNEL RESPONSIBLE FOR:

- waste management
- water treatment
- environmental protection
- public health
- civil defense
- industrial hygiene
- labor and industry
- law enforcement
- industrial environmental management
- environmental science education
- transportation
- planners
- Engineers—working in any of the following areas:
  consulting, research, process, sanitary, project design, environmental, chemical, production, civil and pollution control
- engineering supervisors and managers
- Federal, State, Regional, and Municipal Regulatory Agency Personnel
- Fire Response Personnel

WHY YOU SHOULD ATTEND

COURSE FORMAT AND MATERIALS

All courses will provide participants with the following:

- a technical training manual
- up-to-date handouts and articles
- group exercises and participation
- training certificates and certification
- multi media presentations
- question and answer sessions
- consultation with presenters

COURSE DIRECTORS

Dr. Raymond D. Harbison
Director, Toxic Substances Control Laboratory
Vanderbilt Medical Center

Dr. Thomas H.F. Smith
Director, Environmental Resources Group
IMS America, Ltd.

FACULTY MEMBERS

Mr. Evrett W. Benton, Industrial Toxicologist, OSHA
Mr. Joel Charm, Director of Product Safety, Allied Chemical Company
Dr. James H. Clarke, President, Recra Environmental and Health Sciences, Inc.
Mr. Lory A. Crisorio, Director of Regulations and Standards Safety and Health Affairs, Union Carbide Corp.
Mr. Jeffrey R. Diver, Attorney, Chief Environmental Counsel, Waste Management Corp.
Mr. James J. Geraghty, President, Geraghty and Miller, Inc.
Dr. Robert C. James, Associate Director of The Center for Environmental Quality Management, Toxic Substance Control Laboratory, Vanderbilt University
Mr. George Moein, Chief, Hazardous Materials Spills Section, Region IV, Environmental Protection Agency
Dr. Paul O. Nees, Director of Toxicology and Safety Assessment, Hooker Chemical Company
Dr. Wm. Rinehart, V.P. Safety Evaluation, Biodynamics
Mr. Richard D. Ross, Vice President, Read-Ferry Company
Mr. Al Smith, Chief Environmental Emergency Branch, Environmental Protection Agency
Mr. Robert A. Stadelmaier, Executive Vice President, CECOS International Inc.
Mr. James L. Sutherland, Hazardous Materials Specialist, Recra Environmental and Health Sciences, Inc.
Mr. Michael S. Terpilak, Consultant specializing in Hazard Control Management Programs
Dr. Frederick M. Toca, Manager of Industrial Hygiene and Safety, General Electric Plastics
Mr. James Walker, Vice President, Oil and Hazardous Materials Inc.
Dr. James L. Wood, Director, R&D Resources Recycling Technology, Inc.
Dr. Frederick Ziegler, Director of Resources Management, Associated Water and Air Resources Engineers, Inc.

COURSE NO. 3. INDUSTRIAL TOXICOLOGY

Course Objectives

The application of the principles, concepts, and techniques of hazardous materials control is becoming increasingly important for protection of the environment, health, and welfare of the general public and the industrial work force. This seminar is geared to provide a working knowledge of hazardous materials and to be responsive to your needs for compliance with the Occupational Safety and Health Act (OSHA) regulation of hazardous materials. Consultation will be available throughout the seminar.

COURSE CONTENT

INDUSTRIAL TOXICOLOGY
- Definitions

TOXICOLOGY OF HAZARDOUS INDUSTRIAL MATERIALS - I

TOXICOLOGY OF HAZARDOUS INDUSTRIAL MATERIALS - II
- Hydrocarbons
- Halogenated Hydrocarbons
- Esters
- Aldehydes, Ketones
- Ethers

RADIOACTIVE MATERIALS
- Health Hazards
- Safe Handling
- Industrial Hygiene
- Disposal

OCCUPATIONALLY RELATED DISEASES

INDUSTRIAL HYGIENE - MONITORING AND SAFETY ENGINEERING

CONTROL OF OCCUPATIONAL HAZARDS - CHEMISTRY

OCCUPATIONAL SAFETY AND HEALTH REGULATIONS
- Compliance
- Liability

HAZARDOUS WASTES AND INDUSTRIAL EFFLUENTS
- Air Monitoring
- Water Monitoring
- Hazardous Waste Steam Control
- Hazardous Wastes Designation
- Regulations
- Compliance

COURSE NO. 4. NEW ASPECTS OF THE TOXIC SUBSTANCE CONTROL ACT

The Toxic Substance Control Act became effective January 1, 1977, and is presently being implemented. This course is designed to help industry comply with the new provisions of this legislation. Regulatory compliance requirements are numerous and complex. Requirements include premarket notification, safety, health and environmental effects testing, as well as records development and annual and periodic reports.

This course is designed to provide an understanding and update of the regulatory activities, and to provide a foundation for development of a compliance program. A comprehensive discussion of regulatory activity interpretations and requirements will be included as well as a discussion of toxicology and environmental effects testing.

COURSE CONTENT

TOXIC AND HAZARDOUS SUBSTANCES
- Introduction

TSCA - DEVELOPMENT: CONTENT REQUIREMENTS IMPLEMENTATION

RULES AND REGULATIONS
- Development and Retention of Records
- Supplemental Inventory Reporting Rules
- Phase II and III Inventory Reporting Rules

PREMANUFACTURING NOTIFICATION

SCIENTIFIC AND TECHNICAL ASPECTS
Health Effects Testing
Environmental Effects Testing
Other Effected Areas
- Engineering
- Production
- Safety
- Quality Control
- Labelling
- Inspections Under TSCA
- Estimates & Projections Under Section

SUBSTANTIAL RISK REPORTING

RISK ANALYSIS

BUSINESS EFFECTS
- Functional Effects
- Operational Effects

COMPLIANCE PLANNING

CERTIFIED BY THE AMERICAN BOARD OF INDUSTRIAL HYGIENE FOR 4½ CREDITS FOR MAINTENANCE OF CERTIFICATION

1980 SCHEDULE AND LOCATIONS 1981

SEPTEMBER		1	2		4	5	6
	7	8	9	10	11	12	13
	14	15	16	17	18	19	20
	21	HAZARDOUS MATERIALS TRAINING HAZARDOUS WASTE MANAGEMENT DETROIT, MICHIGAN					27
	28	29	30	1	2	3	4
OCTOBER	5	INDUSTRIAL TOXICOLOGY NASHVILLE, TENNESSEE					11
	12	13	14	15	16	17	18
	19	HAZARDOUS MATERIALS TRAINING HAZARDOUS WASTE MANAGEMENT SAN JUAN, PUERTO RICO					25
	26	HAZARDOUS MATERIALS TRAINING NEW ASPECTS OF TOSCA PHILADELPHIA, PENNSYLVANIA					1
NOVEMBER	2	3	4	5	6	7	8
	9	10	11	12	13	14	15
	16	HAZARDOUS MATERIALS TRAINING HAZARDOUS WASTE MANAGEMENT NEWARK, NEW JERSEY					22
	23	24	25	26	27	28	29
DECEMBER	30	HAZARDOUS MATERIALS TRAINING INDUSTRIAL TOXICOLOGY ATLANTA, GEORGIA					6
	7	8	9	10	11	12	13
	14	15	16	17	18	19	20
	21	22	23	24	25	26	27
	28	29	30	31			

JANUARY					1	2	3
	4	5	6	7	8	9	10
	11	HAZARDOUS MATERIALS TRAINING HAZARDOUS WASTE MANAGEMENT SAN FRANCISCO, CALIFORNIA					17
	18	19	20	21	22	23	24
	25	26	27	28	29	30	31
FEBRUARY	1	2	3	4	5	6	7
	8	HAZARDOUS MATERIALS TRAINING HAZARDOUS WASTE MANAGEMENT DENVER, COLORADO					14
	15	16	17	18	19	20	21
	22	23	24	25	26	27	28
MARCH	1	2	3	4	5	6	7
	8	9	10	11	12	13	14
	15	HAZARDOUS MATERIALS TRAINING HAZARDOUS WASTE MANAGEMENT GALVESTON, TEXAS					21
	22	23	24	25	26	27	28
APRIL	29	30	31	1	2	3	4
	5	6	7	8	9	10	11
	12	13	14	15	16	17	18
	19	HAZARDOUS MATERIALS TRAINING HAZARDOUS WASTE MANAGEMENT BOSTON, MASSACHUSETTS					25
	26	27	28	29	30		

Enrollment Information

IN GENERAL: Early registration is recommended as enrollment is limited. Confirmation letters will be mailed to each registrant. All advance payments are fully refundable if notification received 10 days prior to the start of the seminar.

TAX DEDUCTION: An income tax deduction may be allowed for educational expenses (including registration fees, travel, meals, lodging) undertaken to maintain and improve professional skills (See Treas. Reg. 1.162-5) (Coughlin vs. Commissioner 203F 2D 307).

CERTIFICATES AND CONTINUING EDUCATION UNITS: Certificates and 3 CEU's (Continuing Education Units) will be awarded by Vanderbilt University to all participants at the completion of the seminar. Continuing Education Units (CEUs) are nationally recognized units which you earn for participating in qualified continuing education programs. Similar to credits which allow you to carry degree work from one school to another, CEUs make it possible to document non-credit work completed. Recorded on a permanent transcript which may be transmitted only with your authorization. CEUs may be used as evidence of increased performance capabilities and for job advancement. One CEU is awarded for 10 contact hours of such participation.

FEE: The registration fee of $595 includes attendance at all sessions, a copy of the seminar manual, and a social hour.

GROUP DISCOUNTS: Special group discounts available. Phone for details.

PAYMENT AND REGISTRATION:

The names, titles, address and phone number of each registrant, and the course, date and location desired, plus a check to cover the fee should be mailed directly to:

Dr. Thomas H.F. Smith
Director
Environmental Resources Group
IMS America, Ltd.
Ambler, Pennsylvania 19002

Checks should be made payable to:

IMS America, Ltd.

For additional information call:

Dr. Thomas H.F. Smith
(215) 643-0400, Ext. 546

Hotel Reservation Forms and Information Will Be Sent to You with Your Course Registration Confirmation

MAIN/DDS/th
6240
SEP 0 9 1980

From: Base Maintenance Officer
To: Assistant Chief of Staff, Facilities

Subj: Hazardous Materials Management Program; requirements of

Ref: (a) Resource Conservation and Recovery Act (RCRA)
(b) MCBul 6280 of 1 May 1980

Encl: (1) DPDO memo of 8 Aug 1980 w/attachments
(2) CMC Washington DC 141512Z June 1980
(3) CMC Washington DC 151515Z June 1980

1. This memorandum outlines the significance of recent DOD decisions regarding the implementation of references (a) and (b). Deputy Assistant Secretary of Defense Marienthal determined that installation commanders would be the responsible official regarding compliance with RCRA notification procedures for DPDO hazardous waste activities. This determination outlined in enclosure (1) may impact adversely on the subject program being developed to implement references (a) and (b) at Camp Lejeune. Enclosures (2) and (3) indicate that the Defense Logistic Agency (DLA) has been assigned primary responsibility for hazardous material disposal with certain excepted categories of hazardous wastes. By not registering DPDO with EPA as a generator, transporter, or storer of hazardous waste, DPDO activities in these areas will have to be carried out under the authority of the Commanding General, Marine Corps Base, in order to comply with reference (a). Consequently, Marine Corps Base will retain legal responsibility for all hazardous waste activity up to the point that wastes are delivered to an EPA approved disposal/storage site.

2. The base program currently being developed anticipated a 12-24 months transition period before the local DPDO could develop the facilities and manpower to assume responsibility for hazardous waste storage and disposal. Consequently, this apparent conflict should not cause any significant problem for the short run. However, previous assumptions that DLA would at some point in time take a leading role in the subject program, thereby relieving base from much of the manpower and disposal costs of the subject program, is now in question. It is therefore recommended that appropriate contact be made with HQMC to request clarification of this issue and guidance regarding manpower and funding for this program. It is also recommended that HQMC be informed of the advantage to base of DPDO/DLA being the lead agency operating independently of base.

B. W. ELSTON
Acting Base Maintenance Officer

MEMO ROUTING SLIP	NEVER USE FOR APPROVALS, DISAPPROVALS, CONCURRENCES, OR SIMILAR ACTIONS	ACTION
1 TO: COMMANDING GENERAL MCB, CLNC	INITIALS / DATE	CIRCULATE / COORDINATION
2 ATTN: BASE MAINTENANCE OFFICER		FILE / INFORMATION
3		NOTE AND RETURN / PER CONVERSATION
4		SEE ME / SIGNATURE

REMARKS

For your information per reference DPDR-MR 232-80 msg.

FROM: Mr. King - DPDO-Lejeune

DATE: 8/4/80

PHONE: 5613

DD FORM 1 OCT 60 95
0102-000-6500

REPLACES DD FORM 94, 1 FEB 50 AND DD FORM 95, 1 FEB 50 WHICH WILL BE USED UNTIL EXHAUSTED.

ENCLOSURE (1)

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F | T/A: C | 1 | APPROVED | DATE RECEIVED (yr., mo., & day)

I. NAME OF INSTALLATION

DEFENSE PROPERTY DISP OFFICE LEJEUNE

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 BLDG 906

CITY OR TOWN: 4 CAMP LEJEUNE | ST.: NC | ZIP CODE: 28542

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 BLDG 906

CITY OR TOWN: 6 CAMP LEJEUNE | ST.: NC | ZIP CODE: 28542

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 KING MARVIN J PROP DISP OFF | PHONE NO. *(area code & no.)*: 919-451-5613

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 DEPARTMENT OF DEFENSE

DETACH

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

F (36)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION (57)
- [ ] B. TRANSPORTATION *(complete item VII)* (58)
- [X] C. TREAT/STORE/DISPOSE (59)
- [ ] D. UNDERGROUND INJECTION (60)

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR (61)
- [ ] B. RAIL (62)
- [ ] C. HIGHWAY (63)
- [ ] D. WATER (64)
- [ ] E. OTHER *(specify):* (65)

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

CONTINUE ON REVERSE

S														T/A	C
W															1
1	2											13	14	15	

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001) [X] 2. CORROSIVE (D002) [X] 3. REACTIVE (D003) [X] 4. TOXIC (D000)

DETACH A

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

DETACH A

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	M. J. KING, PROPERTY DISPOSAL CHIEF	7/17/80

CZCREA390
RTTUZYUW RUCLFTA5683 2182012-UUUU--RUCLBRA.
ZNR UUUUU
R 052003Z AUG 80
FM DPDR COMDR MEMPHIS TN
TO AIG 4544 //ACT: DPDO//
BT
UNCLAS DPDR-MR 232-80 PASS TO DEFENSE PROPERTY DISPOSAL OFFICES
SUBJECT: COMPLIANCE WITH RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) NOTIFICATION REQUIREMENTS
1. REFERENCE DPDR-MR LETTER 9 JUL 80, SUBJECT: RESOURCE CONSERVATION AND RECOVERY ACT OF 1976.
2. AT THE MONTHLY ENVIRONMENTAL QUALITY MEETING HELD BY THE DEPUTY ASSISTANT SECRETARY OF DEFENSE (EE&S) 0 8 JULY 80, DPDS WAS INFORMED OF A DECISION MADE BY MR. MARIENTHAL THAT THE INSTALLATION COMMANDER IS THE RESPONSIBLE OFFICIAL REGARDING COMPLIACE WITH RCRA NOTIFICATION PROCEDURES. THEREFORE, ALL TENANT (DPDO'S) ACTIVITIES SHOULD REPORT THEIR POTENTIAL GENERATIONS OF HAZARDOUS WASTE TO THE HOST INSTALLATION COMMANDER FOR INCLUSION ON THE HOST NOTIFICATION FORM.
3. IN VIEW OF THE ABOVE, TAKE IMMEDIATE ACTION TO REPORT YOUR POTENTIAL HAZARDOUS WASTE GENERATIONS

AUG 5 20 29:80

PAGE 2 RUCLFTA5683 UNCLAS
TO THE INSTALLATION COMMANDER. YOU MAY WISH TO CONSIDER USING THE SAME NOTIFICATION PACKET YOU ORIGINALLY PREPARED AND FORWARD TO DPDS-LPE AS A VEHICLE FOR INFORMING THE HOST INSTALLATION.
4. IT IS OUR UNDERSTANDING THAT A PROPOSED WRITTEN POLICY IS IN FINAL DRAFT STAGE AT DASD (EE&S). HOWEVER, SINCE TIME IS OF ESSENCE, PROCEED IMMEDIATELY TO INTERFACE WITH THE INSTALLATION COMMANDER.
BT
#5683

TOR: 052029z AUG80/46
DPDO

MYNN

PRIORITY

****
* U N C L A S S I F I E D *
****

PT C0096 196/2001Z

PAGE 01

ACTION

PRIORITY

DISTRIBUTION
HS CNO
HS ADMO
HS NREAD
HS Admin D.
HS Oper D.
M&R D.
Tele D.
Util D.
FSA O.
Prop O.
NAME
Maint NCO
Secretary

PTTUZYUW RUEACMC8643 1962001-UUUU--RUEBDOA.
ZNR UUUUU
P R 1415127 JUL 80
FM CMC WASHINGTON DC
TO AIG EIGHT ACT: CG MCB
INFO RUENAAA/CNO WASHINGTON DC
RULSSAA/COMNAVFACENGCOM WASHINGTON DC
RUEPIAB/HQ DPDS BATTLE CREEK MI
RUWDPAA/NAVENVSUPPO PORT HUENEME CA
BT

//COMM NOTE//
MSG DIST. BY
SSIC (6260)

UNCLAS //N06290// SECTION 01 OF 02
CNO PASS TO OP45. COMNAVFACENGCOM PASS TO 1122
SUBJ: MCBUL 6280. DATA CALL FOR DLA-ASSIGNED HAZARDOUS MATERIALS
CMC CODE LFF
REPORT REQUIRED: DATA CALL (REPORT SYMBOL DD-6240-01) (EXTERNAL REPORT SYMBOL DLA (OTN) 2267 (S)), PAR 3
1. RECENT DEFENSE ENVIRONMENTAL QUALITY PROG POLICY MEMO (DEQPPM) PROVIDED REVISED POLICY GUIDANCE FOR DISPOSAL OF HAZARDOUS MATERIALS. MCBUL DETAILING THIS POLICY TO FOLLOW. IN SUMMARY, WITH EIGHT EXCEPTIONS DESCRIBED IN PARS 2A THRU H, DLA HAS BEEN DESIGNATED THE RESPONSIBLE AGENCY WITHIN DOD FOR WORLDWIDE DISPOSAL OF ALL HAZARDOUS MATERIALS PROPERLY PACKAGED AND IDENTIFIABLE BY

PAGE 02 RUEACMC8643 UNCLAS
NSN'S, MFR'S PART NOS., OR MILSPEC NOS.; LOCALLY PURCHASED PROPERTY WITH LOCALLY ASSIGNED STOCK NOS.; AND THAT PROPERTY WHICH BY MILITARY REG REQUIRES APPLICATION OF LOCAL STOCK NO. PRIOR TO DISPOSAL DLA HAS BEEN DIRECTED TO IMPLEMENT THE NEW DEQPPM AS RAPIDLY AS POSSIBLE. IN ORDER FOR DLA TO PROCEED WITH IMPLEMENTATION, DEFENSE PROPERTY DISPOSAL SERVICE (DPDS) HAS ORGANIZED AN INTERSERVICE TASK GROUP TO PLAN ACTIONS AND MILESTONES REQUIRED IN THE SHORT RANGE. THE TASK GROUP HAS PROMULGATED A DATA CALL TO IDENTIFY CURRENT AND PROJECTED WORKLOAD, TECHNICAL ASSISTANCE, ENVIRONMENTAL DOCUMENTATION AVAILABLE, AND EXISTING CONTRACTUAL EFFORT. THIS BULLETIN DETAILS PART I OF THE DATA CALL AND PROVIDES DEFINITIVE GUIDANCE FOR DISTINGUISHING DLA-ASSIGNED HAZARDOUS MATERIALS FROM SERVICE-ASSIGNED HAZARDOUS MATERIALS. PART II OF THE DATA CALL WILL PROVIDE INSTRUCTIONS REGARDING TURN-IN OF HAZARDOUS MATERIALS. DD FORM 1348-1 WILL BE UTILIZED, AND DLA WILL EXTRACT ADDITIONAL DATA REQUIREMENTS THROUGH THIS DOCUMENT.
2. MATERIAL IS HAZARDOUS WHEN, BECAUSE OF ITS QUANTITY, CONCENTRATION, OR PHYSICAL, CHEMICAL, OR INFECTIOUS CHARACTERISTICS, IT MAY CAUSE OR CONTRIBUTE TO AN INCREASE IN MORTALITY OR SERIOUS ILLNESS OR POSE SIGNIFICANT THREAT TO HUMAN HEALTH OR THE ENVIRONMENT WHEN

PAGE 03 RUEACMC8643 UNCLAS
IMPROPERLY TREATED, STORED, TRANSPORTED, DISPOSED OF, OR OTHERWISE MANAGED. THIS INCLUDES PERSONAL PROPERTY, CONSISTING OF ITEMS,

****
PRIORITY * U N C L A S S I F I E D *
****

ENCLOSURE (2)

141512Z Jul 80

PRIORITY

SCRAP, AND WASTE. HAZARDOUS MATERIALS DO NOT INCLUDE RADIOACTIVE MATERIALS CONTROLLED BY THE NUCLEAR REGULATORY COMMISSION. ALL HAZARDOUS MATERIALS ARE ASSIGNED TO DLA FOR DISPOSAL EXCEPT THE FOLLOWING, WHICH ARE RETAINED BY THE SERVICES:

A. TOXICOLOGICAL, BIOLOGICAL, RADIOLOGICAL, AND LETHAL CHEMICAL WARFARE MATERIALS WHICH, BY U.S LAW, MUST BE DESTROYED. DISPOSAL OF THE BYPRODUCTS OF SUCH MATERIAL IS THE RESPONSIBILITY OF THE DOD COMPONENT WITH ASSISTANCE FROM DLA.

B. MATERIAL WHICH CANNOT BE DISPOSED OF IN ITS PRESENT FORM DUE TO MILITARY REGULATIONS: E.G., CONSECRATED RELIGIOUS ITEMS AND CRYPTOGRAPHIC EQUIPMENT.

C. MUNICIPAL-TYPE GARBAGE TRASH, AND REFUSE RESULTING FROM RESIDENTIAL, INSTITUTIONAL, COMMERCIAL, AGRICULTURAL, AND COMMUNITY ACTIVITIES WHICH THE FACIL ENGINEER OR PUBLIC WORKS OFFICER ROUTINELY COLLECTS. HAZARDOUS WASTES SHALL NOT BE COMINGLED WITH MUNICIPAL-TYPE GARBAGE AS A SUBTERFUGE FOR AVOIDING HAZARDOUS WASTE REGULATIONS.

D. CONTRACTOR-GENERATED MATERIALS WHICH ARE THE CONTRACTOR'S

PAGE 04 RUEACMC8643 UNCLAS

RESPONSIBILITY FOR DISPOSAL UNDER THE TERMS OF THE CONTRACT.

E. SLUDGES RESULTING FROM MUNICIPAL-TYPE WASTEWATER TREATMENT FACILS. THE TYPE OF SLUDGE GENERATED IN A DOMESTIC SEWAGE TREATMENT PLANT IS DEFINED BY EPA AS A HAZARDOUS WASTE, BUT WILL BE REGULATED IN THE FUTURE BY EPA THROUGH A SPECIAL PROG ENCOMPASSING REGULATORY ELEMENTS OF BOTH THE CLEAN WATER ACT AND RCRA.

F. SLUDGES AND RESIDUES GENERATED AS A RESULT OF INDUSTRIAL PLANT PROCESSES OR OPERATIONS. THIS EXCEPTION REQUIRES CAREFUL EXPLANATION. THE MERE FACT THAT A PARTICULAR MATERIAL WAS INVOLVED IN A GIVEN INDUSTRIAL PLANT PROCESS OR OPERATION DOES NOT AUTOMATICALLY MEAN THAT IT IS A SLUDGE OR RESIDUE. IT MAY BE AN "ITEM" AS DEFINED IN THE NEW DEQPPM. FOR EXAMPLE, CONTAMINATED SOLVENTS USED IN METAL DEGREASING OR USED PLATING SOLUTIONS IN A PLATING SHOP WOULD NOT BE CLASSIFIED AS SLUDGE OR RESIDUE BUT WOULD BE CLASSIFIED AS USED OR CONTAMINATED ITEMS. THE CHEMICAL COMPOSITION OF SLUDGES OR RESIDUES CANNOT BE DETERMINED WITHOUT EXTENSIVE ANALYTICAL CHEMICAL TESTING. SLUDGES AND RESIDUES ARE USUALLY SOLID OR SEMI-SOLID, AND LIQUIDS ARE USUALLY ITEMS. AN ITEM MAY BE USED, MIXED, AND CONTAMINATED AND STILL BE A DLA RESPONSIBILITY, IF IDENTIFIABLE BY NSN'S.

PAGE 05 RUEACMC8643 UNCLAS

G. REFUSE AND OTHER DISCARDED MATERIALS WHICH RESULT FROM MINING, DREDGING, CONSTRUCTION, AND DEMOLITION OPERATIONS.

H. UNIQUE WASTES AND RESIDUES OF NONRECURRING NATURE WHICH RESEARCH AND DEVELOPMENT EXPERIMENTAL PROGS GENERATE.

3. DLA REQ INFO REGARDING PAST AND PRESENT HAZARDOUS MATERIAL DISPOSAL CONTRACTS AND ASSOCIATED ENVIRONMENTAL DOCUMENTATION, ITEM-

PRIORITY

IZED IN PARS 3A THRU E. ADDRESSEES SHALL COLLECT DATA; COORDINATE WITH FMF UNITS, AS APPROPRIATE; AND RPT BY LTR NLT 22 JUL 1980 TO NAVY ENVIRONMENTAL SUPPORT OFFICE, NAVY ENERGY AND ENVIRONMENTAL SUPPORT ACTIVITY (NAVENENVSA) PORT HUENEME, CA 93043. REPORT SYMBOL DD-6240-01 (EXTERNAL REPORT SYMBOL DLA (OTN) 2267 (S)) HAS BEEN ASSIGNED TO THIS REPORT. PROVIDE COPY OF RPT TO CMC (CODE LFF-2). NEG RESPONSES REQUIRED. POINTS OF CONTACT ARE MR. PAUL HUBBELL (HQMC CODE LFF, AUTOVON 224-1425/-3188) AND MR. KARL KNEELING (NAVENENVSA, AUTOVON 360-4062).

A. DISPOSAL CONTRACTS AWARDED DURING FY79 FOR MATERIAL FOR WHICH DLA HAS ACQUIRED RESPONSIBILITY PER NEW DEQPPM.

(1) IDENTIFICATION OF MATERIAL/COMMODITY.

(2) QUANTITY.

B. DISPOSAL CONTRACTS AWARDED OR IN EFFECT DURING FY80 FOR

BT

#8643

NNNN

PTTUZYUW RUEACMC8644 1962001-UUUU--RUEBDOA.
ZNR UUUUU
P R 1415127 JUL 80
FM CMC WASHINGTON DC
TO AIG EIGHT
INFO RUENAAA/CNO WASHINGTON DC
RULSSAA/COMNAVFACENGCOM WASHINGTON DC
RUEBDAB/HQ DPDS BATTLE CREEK MI
RUWDPAA/NAVENVSUPPO PORT HUENEME CA
BT
UNCLAS //N06290// FINAL SECTION OF 02
MATERIAL FOR WHICH DLA HAS ACQUIRED RESPONSIBILITY PER NEW DEOPPM.
(COPIES OF CONTRACTS MAY BE PROVIDED IN LIEU OF INFORMATION IN
PARS 3B(1) THRU (7).)
(1) CONTRACTOR.
(A) LOCATION OF CONTRACTOR'S OFFICE.
(B) LOCATION OF DISPOSAL SITE.
(C) CONTACT POINT.
(D) TELEPHONE NUMBER.
(2) MATERIAL INCLUDED IN CONTRACT TO INCLUDE CONDITION AND
QUANTITY.
(3) COST DATA.

PAGE 02 RUEACMC8644 UNCLAS
(4) RESTRICTIONS IN CONTRACT.
(5) EXPIRATION DATE.
(6) CONTACT POINT IN MILITARY SERVICE.
(7) TRANSPORTATION REQUIREMENTS.
(8) EPA, STATE OR LOCAL CONTACT POINT, IF A PERMIT IS RE-
QUIRED.
(9) DISPOSAL METHOD.
(10) LIST OF UNSUCCESSFUL BIDDERS.
(11) AVAILABLE ENVIRONMENTAL DOCUMENTATION. (PROVIDE COPY.)
(12) HOW TO OBTAIN COPY.
C. CONTRACTS AWARDED IN LAST TWO YEARS OR PRESENTLY IN EFFECT
FOR TECHNOLOGY OR PREPARATION OF ENVIRONMENTAL ASSESSMENTS (EA'S)
OR ENVIRONMENTAL IMPACT STATEMENTS (EIS'S) ON DISPOSAL OF HAZARDOUS
MATERIAL WHICH IS NOW DLA'S RESPONSIBILITY. (COPIES OF CONTRACTS
MAY BE PROVIDED IN LIEU OF INFORMATION IN PARS 3C(1) THRU (6).)
(1) CONTRACTOR.
(A) LOCATION.
(B) CONTACT POINT.
(C) TELEPHONE NUMBER.
(2) DESCRIPTION OF SERVICES TO BE PROVIDED.

PAGE 03 RUEACMC8644 UNCLAS
(3) COST DATA.
(4) RESTRICTIONS IN CONTRACT.

PRIORITY

(5) MILESTONES INCLUDED IN CONTRACT.
(6) CONTACT POINT IN MILITARY SERVICE.
(7) HOW TO OBTAIN COPY.

D. EIS'S OR EA'S PREPARED IN-HOUSE DURING THE PAST TWO YEARS CONCERNING USE OR DISPOSAL OF HAZARDOUS MATERIALS NOW ASSIGNED TO DLA FOR DISPOSAL (COPIES OF EIS'S/EA'S MAY BE PROVIDED IN LIEU OF INFORMATION IN PARS 3D(1) THRU (7).)

(1) NAME OF RESPONSIBLE FEDERAL AGENCY.
(2) WHO PREPARED
(3) DATE OF APPROVAL.
(4) SUBJ OF ENVIRONMENTAL IMPACT STATEMENT OR ENVIRONMENTAL ASSESSMENT.
(5) LOCATION OF ACTION IF SITE SPECIFIC.
(6) WHERE EIS/EA IS FILED.
(7) CONTACT POINT AND TELEPHONE NUMBER
(8) HOW TO OBTAIN COPY.

E. TRANSFORMERS AND DIELECTRIC FLUIDS WAITING LABORATORY TEST FOR PCB CONTENT IN PREPARATION FOR TURN-IN TO DPDO

PAGE 04 RUEACMC8644 UNCLAS

(1) NSN.
(2) QUANTITY AND UNIT OF ISSUE.
(3) LOCATION AND SERVICING DPDO.
(4) TESTING SCHEDULE, IF ANY.

4. THIS BULLETIN CANCELED 31 DEC 1980.
BT
#8644

NNNN

ACT: FAC
INFO: MANP, TRNG, SAFD, CBC, CPO, PWO
NRMC /47

PRIORITY

PRIORITY ********** * U N C L A S S I F I E D * **********

PT 00321 197/2057Z

(004 657)

PTTNZYUW RUEACMC9092 1972040-UUUU--RUCRNAA.
ZNR UUUUU
P R 1515157 JUL 80 1/
FM CMC WASHINGTON DC
TO ALMAR
INFO RUENAAA/CNO WASHINGTON DC
RULSSAA/COMMAVFACENGCOM WASHINGTON DC
RUEBUAB/HQ DPDS BATTLE CREEK MI
RUWDPAA/NAVENVSUPPO PORT HUENEME CA
BT
UNCLAS //04570//
ALMAR120/80
SUBJ: MCBUL 4570. PART II OF DATA CALL FOR DLA-ASSIGNED HAZARDOUS MATERIALS
(CMC CODE LMM-2)
A. MCBUL 6280 OF 14 JUL 1980 (NOTAL)
B. DOD 4160.21-M
C. DOD 4000.25-D
1. RECENT DEFENSE ENVIRONMENTAL QUALITY PROG POLICY MEMO (DEQPPM) GUIDANCE REVISED WORLDWIDE DOD DISPOSAL POLICY FOR HAZARDOUS MATERIALS (HM) ASSIGNING PRIMARY RESP TO DLA. PART I OF THIS DATA CALL WAS DIRECTED TO MARINE CORPS FACILITIES WHICH HAVE BEEN

PAGE 02 RUEACMC9092 UNCLAS
RESPONSIBLE FOR HM DISPOSAL IN THE PAST AND REQ SELECTED INFO ON RECENT DISPOSAL ACTIONS (REF A APPLIES).
2. DLA HAS PART II OF THE DATA CALL ON HM (PROPERTY IDENTIFIABLE AND BEING HELD BY THE MARINE CORPS) AS FOLLOWS. IN ORDER TO DETERMINE THE MAGNITUDE OF THE PROBLEM, ADDEES SHALL PREPARE AND SUBMIT A VALID DISPOSAL TURN-IN DOCUMENT (DTID) (DD FORM 13481) FOR ALL EXCESS HM WHICH DLA IS RESPONSIBLE FOR AND REMAIN ON ADDEES ACCOUNTABLE RECORDS. SERVICING DPDO'S WILL NOW ACCEPT ACCOUNTABILITY FOR THIS MATERIAL. HOWEVER, THE PROPERTY MUST REMAIN IN ADDEES CUSTODY PENDING FINAL DISPOSITION INSTRUCTIONS. PROPER IDENTIFICATION, PACKAGING, AND LABELING (IAW REF B) REMAIN THE RESPONSIBILITY OF THE TURN-IN ACTIVITY. THE BASIC CRITERIA IS THAT THE MATERIAL MUST BE PACKAGED FOR SAFE HANDLING. THE DTID MUST BE IN THE HANDS OF THE SERVICING DPDO NOT LATER THAN 13 AUG 1980. EACH DTID MUST CLEARLY IDENTIFY THE FOLLOWING:
A. IDENTIFICATION OF THE HM. INCLUDES NSN AND IDENTIFICATION OF TYPES OF CONTAMINANTS AND THE AMOUNT OF EACH CONTAMINANT IN THE ITEM.
B. NSN'S MUST INCLUDE COMPLETE DESCRIPTION AS WELL AS IDENTIFICATION OF THE TYPES AND AMOUNTS OF CONTAMINANTS.
C. QUANTITY WHICH IS CURRENTLY EXCESS.

PAGE 03 RUEACMC9092 UNCLAS

PRIORITY ********** * U N C L A S S I F I E D * **********

ENCLOSURE (3)

D. CONDITION. THE SUPPLY CONDITION CODE (A THROUGH H) SHOULD BE SUPPLEMENTED WITH ADDITIONAL INFORMATION WHEN NECESSARY.

E. TO PERMIT VALID IDENTIFICATION OF THESE TYPES OF TURN-INS AND TO FURTHER DETERMINE THE WORKLOAD INVOLVED, BY VOLUME AND SPECIFIC TYPES OF GENERATIONS, THE FOLLOWING ACTIONS MUST BE TAKEN ON THE DTID:

(1) THE DOD AAC, AS RECOGNIZED IN REF C, MUST BE ASSIGNED TO THE ACTIVITY WHERE THE PROPERTY IS PHYSICALLY LOCATED.

(2) BLOCK D OF THE DTID SHALL BE MARKED "HZ" TO IDENTIFY THIS AS AN HM TURN-IN.

THESE INSTRUCTIONS SPECIFICALLY INCLUDE DIELECTRIC FLUIDS AND TRANSFORMERS, WHETHER OR NOT THE TRANSFORMERS CONTAIN PCB OR PCB-CONTAMINATED FLUIDS. ALL OF THESE FLUIDS AND TRANSFORMERS MUST BE LABORATORY-TESTED AND TEST RESULTS STATING PCB IN PART PER MILLION ATTACHED TO THE DTID. THOSE FLUIDS AND TRANSFORMERS WITHOUT TEST RESULTS ARE SPECIFICALLY EXCLUDED FROM THIS TURN-IN ACTION.

3. COSTS OF CHEMICAL ANALYTICAL TESTING ASSOCIATED WITH THIS ONE-TIME DATA CALL MAY BE CHARGED TO THE NAVY ENVIRONMENTAL PROTECTION SUPPORT SERVICE (NEPSS) CENTRALLY MANAGED POLLUTION ABATEMENT FUNDS ADMINISTERED BY COMNAVFACENGCOM. MARINE CORPS FIELD ACTIVITIES MAY

ARRANGE FOR TESTING THROUGH THE COGNIZANT EFD OF THE NAVFACENGCOM. IT IS EMPHASIZED THAT THE TERMINATION OF THE DATA CALL IS 13 AUG 1980. ACCORDINGLY, FUNDS FOR TESTING WILL NOT BE AVAILABLE SUBSEQUENT TO THAT DATE.

4. POINTS OF CONTACT REGARDING THIS PHASE OF THE DATA CALL ARE MR. PAUL HUBBELL (CMC CODE LFF), AUTOVON 224-1425/3188, ON TESTING AND FUNDING, AND MR. R. H. MITCHELL (CMC CODE LMM), AUTOVON 224-1600/1795, ON DISPOSAL POLICY AND TURN-IN DOCUMENTATION.

5. THIS BULLETIN IS APPLICABLE TO THE MCR.

6. THIS BULLETIN CANCELED 31 DEC 1980.

BT
#9092

NNNN

ACT: SUPS /26
INFO: DPDO, FSMAO-1 IAW ENCLOSURE (2) OF CURRENT CG MCB LTR (SSIC 2340)

OPNAV 5216/144 (REV. 6-70)
S/N 0107-LF-778-8099

DEPARTMENT OF THE NAVY

Memorandum

DATE: 18 Aug 1980

FROM Director, Natural Resources and Envirnmental Affairs Division

TO Base Maintenance Officer

Via: Director, M&R Division

SUBJ PCB Transformers, PCB Contaminated Transformers and PCB's stored in Drums; EPA storage, marking and handling requirements

Ref: (a) OPNAVINST 6240.3E of 5 July 1977
(b) Toxic Substances Control Act

Encl: (1) LANTDIV Notice 6280 of 2 July 1980
(2) Summary Sheet of Transformers, Voltage Regulators and Transformer Oils in Storage at Lot 140, MCBCLNC; awaiting disposal

1. Reference (a) implements EPA regulations promulgated under reference (b) regarding the subject equipment and materials. Enclosure (1) provides a summary of current information and guidance on PCB management.

2. Data contained in enclosure (2) and appendices (a) and (b) thereof, provide necessary information for determining actions required to comply with reference (a) and (b) and enclosure (1) in regard to the subject items.

3. Present storage facilities at Lot 140 are inadequate and do not comply with EPA regulations contained in enclosure (1).

4. Transformers listed in Item 4 of Part I and Part 2 of enclosure (2) should be immediately marked with the "Large PCB Mark" as shown in enclosure (1). Transformers and barrels of transformer oil listed in parts 3 and 5 of Part 1 of enclosure (2) should be immediately marked with the following:

CAUTION CONTAINS LIQUIDS CONTAMINATED WITH POLYCHLORINATED BIPHENYLS (PCB's) IN CONCENTRATIONS OF 50-499 PPM

A yellow durable sticker with black letters is recommended.

Julian I. Wooten

JULIAN I. WOOTEN

14 Aug 80

Dan

File Haz Mat

gww

ROUTING SLIP JUL 25 1980

	ACTION	INFO	INITIAL
BMO		✓	
ABMO		✓	
ADMIN			
ENVIRON AFF		✓	
F&A BRANCH			
MAINT NCO			
M&R			
OPNS		✓	
PROP			
TELE			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

OPNAV 5216/145 (Rev. 3-71)
SN-0107-778-8110

Naval Speedletter

USE FOR URGENT LETTERS ONLY

DO NOT CLEAR THROUGH COMMUNICATIONS OFFICE

CHECK TYPE OF MAIL
[X] REGULAR [ ] REGISTERED
[ ] AIR [ ] CERTIFIED
[ ] SPECIAL DELIVERY

CLASSIFICATION
UNCLASSIFIED

DATE
24 JULY 1980

IN REPLY REFER TO
FAC:JAM:BGW

INSTRUCTIONS

1. Message type phraseology is permissible.

2. Both addresses must be appropriate for window envelope or bulk mailing, as intended. Include attention codes, when known. Use dots and brackets as guides for window envelope addresses.

3. Give priority to processing, routing, and action required. Avoid time-consuming controls.

4. In order to speed processing, a readily identifiable, special window envelope, OPNAV 5216/145A, Speedletter Envelope, is provided for unclassified speedletters where bulk mailing is not used. Other window envelopes also may be used. In bulk mail, speedletters should be placed on top of regular correspondence.

To:
NAVY ENVIRONMENTAL SUPPORT OFFICE
NAVY ENERGY AND ENVIRON SUPPORT ACTIVITY
(NAVENENVA)
PORT HUENEME CA 93043

Fold STANDARD REFERENCES AND ENCLOSURES, IF ANY; TEXT AND SIGNATURE BLOCK

INFO CMC CODE LFF-2

SUBJ: HAZARDOUS MATERIALS

A. CMC MSG 1415122 JUL 80

UNCLAS //N06280//

1. IAW THE REF BELOW INFO PROVIDED:

A. DISPOSAL CONTRACTS AWARDED FY 79: NONE

B. DISPOSAL CONTRACTS AWARDED FY 80: NONE

C. CONTRACTS AWARDED W/IN 2 YRS FOR PREP OF EA'S: NONE

D. EIS'S OR EA'S PRES IN-HOUSE W/IN 2 YRS: NONE

E. TRANSFORMERS AND DIELEC FLUIDS AWAITING LAB AVAL

Fold (1) NSN'S NOT KNOWN, SER NOS AND BRAND NAMES CORRELATED WITH SAMPLES AND USED FOR ID

(2) TWO HUNDRED FORTY TWO (242) AWAIT DISPOSAL. AVG 35 GAL EA.

COPY TO
CMC (LFF-2)

Blind copy to: AC/S, SupSvcs; BMaintO; PWO; DPDO

From:
COMMANDING GENERAL
MARINE CORPS BASE
CAMP LEJEUNE, NC 28542

← ADDRESS REPLY AS SHOWN AT LEFT; OR, REPLY HEREON AND RETURN

CLASSIFICATION
UNCLASSIFIED

B-17088

OPNAV 5216/145 (Rev. 3-71)
SN-0107-778-8110

USE FOR URGENT LETTERS, ONLY

Naval Speedletter

DO NOT CLEAR THROUGH COMMUNICATIONS OFFICE

CHECK TYPE OF MAIL
- ☐ REGULAR
- ☐ REGISTERED
- ☐ AIR
- ☐ CERTIFIED
- ☐ SPECIAL DELIVERY

CLASSIFICATION: UNCLASSIFIED

DATE

IN REPLY REFER TO

INSTRUCTIONS

1. Message type phraseology is permissible.

2. Both addresses must be appropriate for window envelope or bulk mailing, as intended. Include attention codes, when known. Use dots and brackets as guides for window envelope addresses.

3. Give priority to processing, routing, and action required. Avoid time-consuming controls.

4. In order to speed processing, a readily identifiable, special window envelope, OPNAV 5216/145A, Speedletter Envelope, is provided for unclassified speedletters where bulk mailing is not used. Other window envelopes also may be used. In bulk mail, speedletters should be placed on top of regular correspondence.

To:

Fold STANDARD REFERENCES AND ENCLOSURES, IF ANY; TEXT AND SIGNATURE BLOCK

{3} DPDO, CAMLEJ, NC

{4} ALL TRANS HAVE BEEN SAMPLED. TESTING OF SAMPLES WILL BE COMPLETED BY 8 AUG 80

K. P. Millice

K. P. MILLICE, Jr.
By direction

Fold

COPY TO

From:

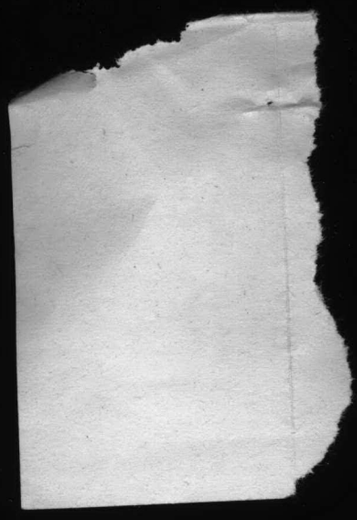
← ADDRESS REPLY AS SHOWN AT LEFT; OR, REPLY HEREON AND RETURN

CLASSIFICATION: UNCLASSIFIED

8-17088

MR. SHAR[illegible]

HERE IS A
COPY OF
THE LETTER
TO MAT.
MARAPOTI



Base Maintenance Department
Marine Corps Base
Camp Lejeune, North Carolina 28542

29 July 1980

From: Supervisory Chemist Quatity Control Laboratory, NREAD, BMaintDept

To: Major MARAPOTI

1. Please deliver the shipment of Transformer Oil samples to Mr. Dave GOODWIN (A/V 690-4915 on Base phone 4-4915), or in his absence Mr. John PARRISS (A/V 690-1320 on Base phone 4-1320). Their office is in Building N-23, Gilbert Street Naval Station, Norfolk.

2. Were advised by Mr. Pete CUNANAN, of the same office, that delivery should be made during normal working hours. Please have person receiving shipment acknowledge receipt by signing below:

_____

Signature Date

Recieved one container of Transformer Oil samples from Marine Corps Base Camp Lejeune:

_____

Signature Date

Elizabeth A. BETZ

11 August 1980

Rear Admiral C. C. Heid, CEC, USN Ret
Regional Vice President
Society of American Military Engineers
c/o Atlantic Division
Naval Facilities Engineering Command
Norfolk, Virginia 23511

Dear Charlie,

Thank you for your letter of 4 August 1980 inviting personnel from Camp Lejeune to attend the Society of American Military Engineers Mid-Atlantic Regional Conference, 29-31 October. We at Camp Lejeune are very interested in the issues and challenges posed by toxic and chemical waste disposal and are enthused by the conference program.

We anticipate sending representatives from our Facilities office as well as our Natural Resources and Environmental activity. Coincidently, Major Marapoti is the local Chapter president of the SAME as well as the Assistant Facilities Officer. He will attend along with Colonel Ken Millice, my Facilities Officer.

I am sorry that I could not attend your retirement ceremony. We were on leave in the Boston area at that time. Prisc joins me in

sending best wishes to you and Marguerite with your retirement plans.

Sincerely,

D. B. BARKER
Major General, U. S. Marine Corps
Commanding General, Marine Corps Base
Camp Lejeune, North Carolina 28542

Copy to (Blind)
AC/S Facil
→ BMaintO

14 Aug 1980

Director, Natural Resources and Environmental Affairs Division

Base Maintenance Officer

DLA Data Call Regarding PCB Contaminated Transformers and Oil

Ref: (a) FONECON btwn Mr. King, DPDO, and Mr. Sharpe, BMaintDept, on 13 Aug 1980

Encl: (1) Analysis Report of Samples from Base Maintenance MCBCL Transformer Oil Sample Lot #1 (1-232)
(2) CMC msg 151515Z July 1980

1. Enclosures (1) and (2) contain information and instruction for preparing DD Form 1348-1 to turn the subject item in to DPDO, Camp Lejeune. The deadline for turn in of the transformer information is 13 August 1980; however, during reference (a), Mr. King agreed to accept the subject property information no later than 15 August 1980.

JULIAN I. WOOTEN

6240

ROUTING SLIP

[redacted] 1 2 1980

	ACTION	INFO	INITIAL
BMO			
ABMO		✓	BWR
ADMIN		✓	
ENVIRON AFF		✓	JDW
F&A BRANCH			
MAINT NCO			
M&R			
OPNS			
PROP			
TELE			
UMACS			
UTIL			
SECRETARY			

COMMENTS:

Danny.
Note & Return
Julia

DDS

JENNINGS LABORATORIES, INC. RECEIVED 7/29/80

JENNINGS LABORATORIES, INC.

SAMPLES FROM: Base Maintenance, MCB CAMP LEJEUNE
Transformer Oil Samples LOT #1 (1-232)

Samples markings: MCBCLNC

Lab. #	Sample Location	PCB CONTENT
1816	#1	409 ppm
1817	#2	193 ppm
1818	#3	172 ppm
1819	#4	168 ppm
1820	#5	202 ppm
1821	#6	181 ppm
1822	#7	254 ppm
1823	#8	551 ppm ✓
1824	#9	418 ppm
1825	#10	418 ppm
1826	#11	206 ppm
1827	#12	
1828	#13	
1829	#14	
1830	#15	
1831	#16	297 ppm
1832	#17	163 ppm
1833	#18	207 ppm
1834	#19	211 ppm
1835	#20	189 ppm
1836	#21	193 ppm
1837	#22	185 ppm
1838	#23	168 ppm
1839	#24	181 ppm
1840	#25	155 ppm
1841	#26	159 ppm
1842	#27	159 ppm
1843	#28	103 ppm
1844	#29	146 ppm
1845	#30	107 ppm
1846	#31	113 ppm
1847	#32	762 ppm
1848	#33	288 ppm
1849	#34	706 ppm
1850	#35	478 ppm

DATE JULY 31, 1980 BY W. H. Johnson, Jr.

SAMPLES FROM: Base Maintenance, MCB Camp Lejeune
Transformer Oil Samples Lot #1 (1-232)

Sample markings: MCBCLNC

Lab #	Sample Location	PCB CONTENT
1851	#36	336 ppm
1852	#37	422 ppm
1853	#38	245 ppm
1854	#39	478 ppm
1855	#40	448 ppm
1856	#41	194 ppm
1857	#42	224 ppm
1858	#43	284 ppm
1859	#44	250 ppm
1860	#45	254 ppm
1861	#46	280 ppm
1862	#47	246 ppm
1863	#48	237 ppm
1864	#49	332 ppm
1865	#50	362 ppm
1866	#51	280 ppm
1867	#52	345 ppm
1868	#53	276 ppm
1869	#54	237 ppm
1870	#55	211 ppm
1871	#56	254 ppm
1872	#57	190 ppm
1873	#58	280 ppm
1874	#59	233 ppm
1875	#60	190 ppm
1876	#61	159 ppm
1877	#62	155 ppm
1878	#63	95 ppm
1879	#64	116 ppm
1880	#65	91 ppm
1881	#66	186 ppm
1882	#67	155 ppm
1883	#68	159 ppm
1884	#69	211 ppm
1885	#70	258 ppm

DATE JULY 31, 1980 PAGE -2- BY W. H. Jennings, Jr.

JENNINGS LABORATORIES, INC. RECEIVED 7/29/80

SAMPLES FROM: Base Maintenance, MCB Camp Lejeune
Transformer Oil Samples Lot #1 (1-232)

Sample markings: MCBCLNC

LAB #	Sample Location	PCB Content
1886	#71	199 ppm
1887	#72	
1888	#73	
1889	#74	
1890	#75	
1891	#76	207 ppm
1892	#77	349 ppm
1893	#78	289 ppm
1894	#79	254 ppm
1895	#80	250 ppm
1896	#81	262 ppm
1897	#82	258 ppm
1898	#83	219 ppm
1899	#84	121 ppm
1900	#85	241 ppm
1901	#86	202 ppm
1902	#87	198 ppm
1903	#88	185 ppm
1904	#89	340 ppm
1905	#90	215 ppm
1906	#91	207 ppm
1907	#92	199 ppm
1908	#93	237 ppm
1909	#94	383 ppm
1910	#95	219 ppm
1911	#96	301 ppm
1912	#97	309 ppm
1913	#98	331 ppm
1914	#101	
1915	#103	195 ppm
1916	#104	179 ppm
1917	#106	120 ppm
1918	#107	440 ppm
1919	#108	150 ppm
1920	#109	140 ppm

DATE: JULY 31,1980 PAGE -3- BY W. N. Jennings, Jr.

SAMPLES FROM: Base Maintenance, MCB Camp Lejeune
Transformer Oil Samples Lot #1(1-232)

Sample markings:
MCBCLNC

LAB #	Sample Location	PCB CONTENT
1921	#112	177 ppm
1922	#113	163 ppm
1923	#119	169 ppm
1924	#120	173 ppm
1925	#125	157 ppm
1926	#126	200 ppm
1927	#128	193 ppm
1928	#129	386 ppm
1929	#131	130 ppm
1930	#132	175 ppm
1931	#133	207 ppm
1932	#135	179 ppm
1933	#136	152 ppm
1934	#137	203 ppm
1935	#138	211 ppm
1936	#139	363 ppm
1937	#140	183 ppm
1938	#141	258 ppm
1939	#142	221 ppm
1940	#143	164 ppm
1941	#144	136 ppm
1942	#145	144 ppm
1943	#146	171 ppm
1944	#147	203 ppm
1945	#148	461 ppm
1946	#149	707 ppm
1947	#150	453 ppm
1948	#151	531 ppm
1949	#152	574 ppm
1950	#153	238 ppm
1951	#154	164 ppm
1952	#155	574 ppm
1953	#156	218 ppm
1954	#157	187 ppm
1955	#158	238 ppm
1956	#159	

DATE: July 31, 1980

BY W. H. Jennings, Jr.

JENNINGS LABORATORIES, INC. RECEIVED 7/29/80

SAMPLES FROM: Base Maintenance, MCB Camp Lejeune
Transformer Oil Samples Lot #1 (1-232)

Sample markings: MCBCLNC

LAB #	Sample Location	PCB CONTENT
1957	#160	161 ppm
1958	#161	379 ppm
1959	#163	382 ppm
1960	#164	283 ppm
1961	#165	217 ppm
1962	#167	306 ppm
1963	#168	283 ppm
1964	#170	430 ppm
1965	#171	180 ppm
1966	#172	220 ppm
1967	#173	143 ppm
1968	#174	257 ppm
1969	#175	473 ppm
1970	#176	257 ppm
1971	#177	230 ppm
1972	#178	163 ppm
1973	#179	443 ppm
1974	#180	190 ppm
1975	#181	150 ppm
1976	#182	262 ppm
1977	#183	301 ppm
1978	#185	589 ppm ✓
1979	#187	168 ppm
1980	#188	238 ppm
1981	#189	601 ppm
1982	#190	191 ppm
1983	#191	246 ppm
1984	#192	211 ppm
1985	#193	219 ppm
1986	#194	246 ppm
1987	#195	285 ppm

DATE: July 31, 1980 PAGE -5- BY W.H. Jennings, Jr.

SERIAL NO.	BRAND	GALLON CAPACITY	TYPE OIL	SAMPLE NO.
6713864	General Electric (GE)	37	10 c	1
1392613	Line Material (LM)	Est 40	- -	2
3097591	Westinghouse (W)	Est 5	- -	3
1392615	Line Material	Est 40	- -	4
1859296	Allis Chalmers (AC)	35	- -	5
6075257	W	30	- -	6
3179263	W	20	- -	7
6819130	GE	32	- -	8
3786786	GE	25	- -	9
6608373	GE	32	- -	10
E961450	Wagner	25	- -	11
60AC6397	W	Est 30	- -	12
K161724Y1A	GE	10	- -	13
0150491	AC	14	- -	14
102847	Standard	18	- -	15
1811026	AC	17	- -	16
1797627	AC	17	- -	17
1797623	AC	17	- -	18
SU78672	Wagner	25	- -	19
E7212N57CC3	W	25	- -	20
SCK2823	Standard	8	- -	21
M57639	Delta-Star	15	- -	22*
SCK2917	Standard	8	- -	23
SU78674	Wagner	24	- -	24
J450395Y7D	GE	8	- -	25
A7212A25AA1	W	10	- -	26
3178936	W	31	- -	27
3156316	W	20	- -	28
108588	Standard	10	- -	29
3156567	W	10	- -	30
108589	Standard	10	- -	31
6607423	GE	58	- -	32
6607480	GE	58	- -	33
6607422	GE	58	- -	34*
6607424	GE	54	- -	35
6607465	GE	60	- -	36
6607428	GE	58	- -	37
3156322	W	15	- -	38
6607436	GE	54	- -	39
6607478	GE	54	- -	40
3178586	W	74	- -	41
8918403	Esco	30	- -	42
74AM2998	W	50	- -	43
6607447	GE	46	- -	44
1798479	AC	36	- -	45
66349	Line Material	18	- -	46
663439	Line Material	18	- -	47
1811664	AC	20	- -	48
155830	Standard	35	- -	49
6607466	GE	58	- -	50

SERIAL NO.	BRAND	GALLON CAPACITY	TYPE OIL	SAMPLE NO.
61J13603	W	25	10 c	51
1832666	AC	36	- -	52
4324537	AC	30	- -	53
102783	Standard	35	- -	54
8918417	Esco	30	- -	55
14RS348	W	35	- -	56
66AB8273	W	15	- -	57
72AM11390	W	10	- -	58
1813812	AC	20	- -	59
1813817	AC	20	- -	60
1823675	AC	20	- -	61
12920603	Esco	18	- -	62
3156315	W	20	- -	63
6424539	W	15	- -	64
14UW152	PA#	20	- -	65
14UW152	PA#	20	- -	66
C545553	GE	15	- -	67
C545551	GE	15	- -	68
C545550	GE	15	- -	69
55526372	W	30	- -	70
3102136	W	20	- -	71
E7212N37003	W	25	- -	72
1823676	AC	20	- -	73
3168316	W	20	- -	74
3004012	W	20	- -	75
4474228	AC	20	- -	76
1225548	LM	10	- -	77
1013648H	W	45	- -	78
1299233	LM	15	- -	79
3174518	W	22	- -	80
3689706	AC	10	- -	81
1730750	AC	15	- -	82
1816868	AC	15	- -	83
8918426	Esco	40	- -	84
B388030	GE	22	- -	85
73AF20095	W	20	- -	86
B54399	Kuhlman	15	- -	87
B54401	Kuhlman	15	- -	88
9363571	GE	20	- -	89
2832300	W	18	- -	90
12920608	Esco	18	- -	91
12920601	Esco	18	- -	92
9363592	GE	20	- -	93
8486157	GE	35	- -	94
8486152	GE	35	- -	95
8486158	GE	35	- -	96
8486145	GE	35	- -	97
8486146	GE	35	- -	98
73506	Uptegraph	Empty		99
6403247	W	Empty		100

SERIAL NO.	BRAND	GALLON CAPACITY	TYPE OIL	SAMPLE NO.
72AD11318	W	40	10 c	101
3132691	W	Empty	- -	102
694167867Y	GE	30	- -	103
62665	Unknown	35	- -	104
3102135	W	Empty	- -	105
1797685	AC	36	- -	106
6607452	GE	46	- -	107
3059286	W	30	- -	108
3001916	W	26	- -	109
3001046	W	Empty		110
2837966	W	Empty		111
2837961	W	26	- -	112
L365080Y74AA	GE	50	- -	113
3132676	W	Empty		114
6819129	GE	Empty		115
3102149	W	Empty		116
3058265	W	Empty		117
3102148	W	Empty		118
3101979	W	20	- -	119
30582685	W	20	- -	120
3102166	W	Empty		121
3102655	W	Empty		122
3132688	W	Empty		123
6075262	W	Empty		124
62577	Unknown	30	- -	125
4127014	W	18	- -	126
1839724	AC	Empty		127
1839726	AC	20	- -	128
3105732	W	40	- -	129
3163942	W	Empty		130
6713577	GE	37	- -	131
913885	Standard	10	- -	132
D1242-B	Eisler	12	- -	133
C870291-56Y	GE	Empty		134
63AJ3877	W	10	- -	135
K79954Y72A	GE	12	- -	136
K727940Y72A	GE	12	- -	137
S17869	Standard	15	- -	138
K796276972AA	GE	12	- -	139
57G6665	W	40	- -	140

SERIAL NO.	BRAND	GALLON CAPACITY	TYPE OIL	SAMPLE NO.
102782	Standard	35	A (?)	141
102784	Standard	35	A (?)	142
102778	Standard	35	A (?)	143
3156987	W	Est 40		144
67AM11640	W	Est 10		145
3156966	W	Est 40		146
L987505YHMA	GE	Est 20		147
77A571605	W	Est 30		148
6950693	GE	56	10-c	149
6950680	GE	56	10-c	150 —
6950689	GE	56	10-c	151
6607441	GE	54	10-c	152
6607435	GE	54	10-c	153
5407102	W	Est 45		154
1808808	AC	150	CBS	155
6950681	GE	56	10-c	156 574
3156985	W	Est 35		157
A60738	Kuhlman	30		158
S5145(?)	Standard	Est 30		159
353320	W	Est 10		160
3148361	W	Est 15		161
3533205	W	Empty		162
1788980	AC	83	CBS	163
1789917	AC	83	CBS	164
3533211	W	Est 10		165
155795	Standard	Empty		166
6607470	GE	57 1/2	10-c	167
3102155	W	Est 20		168
3058277	W	Empty		169
6607463	GE	57 1/2	10-c	170
55-gallon oil drum containing about 45 gallons				171
55-gallon oil drum containing about 10 gallons				172
10919544	Esco	Est 45	OISC CSP	173
4324538	AC	25.5	DBPC	174
6939761	GE	6	10-c	175
4921267	AC	19	DBPC	176
M83837YFRB	GE	Est 10		177
F3850902	Line Material	Est 35		178
6950694	GE	56	10-c (1/2 full)	179
6075266	W	Est 30		180
1800061	AC	24		181
1833620	AC	40		182
B905786	GE Voltage Regulator	60	10-CA	183
Oil leaked out - oil switch. No S/N plate found				184
B905790	GE Voltage Regulator	60	10-CA	185 589
6607445	GE	Empty		186
1825243	AC	83		187
8486177	GE	Est 5		188
6819193	GE	11	10-c	189
1788986	AC	83		190
113328	Delta-Star	Est 20		191
62688	Re Uptigraff	29		192
62682	Scottdale Pa.	29		193
62704		29		194
3090625	W	16		195

SERIAL NO.	BRAND	GALLON CAPACITY	TYPE OIL	SAMPLE NO.
6607469	GE	57 1/2	10-c	196
77A510598	W	Est 30		197
1817115	AC	83		198
F36365	Line Material	Est 30		199
9345730	GE	Est 50 (Empty)		200
6155401	W	Est 40		201
6958374	GE	19		202
8486149	GE	35		203
1839713	AC	17		204
76AY70493	W	Est 12		205
1152044	Line Material	Est 12		206
3407811	W	Est 12		207
5037641	W	Est 40		208
103906	Standard	26		209
103904	Standard	26		210
5037638	W	Est 30		211
5037639	W	Est 30		212
1151933	LM	Est 15		213
71233	Uptegraph	40		214
F3636506	LM	Est 30		215
1097441	W	33		216
1087441	W	33		217
1-19Y625	W	33		218
11-1014340	W	20		219
11-1014340	W	20		220
11-1014340	W	20		221
11-1014340	W	20		222
11-1014340	W	100		223
2A6145-2	AC	587		224
122176	Standard	162		225
13-1014340	W	20		226
13-1014340	W	20		227
13-1014340	W	20		228
Barrel of PCB Oil 50 gallons				229
69PK8308	W	21		230
69PK8309	W	21		231
3 Transformers with approximately 21 gallons PCB Oil				
1 with 100 gallons PCB Oil				
6 with 35 gallons PCB Oil				
Barrel of new oil w/o PCB (?)				232

DEPARTMENT OF THE NAVY

COMMANDER, ATLANTIC DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
NORFOLK, VIRGINIA 23511

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, $300

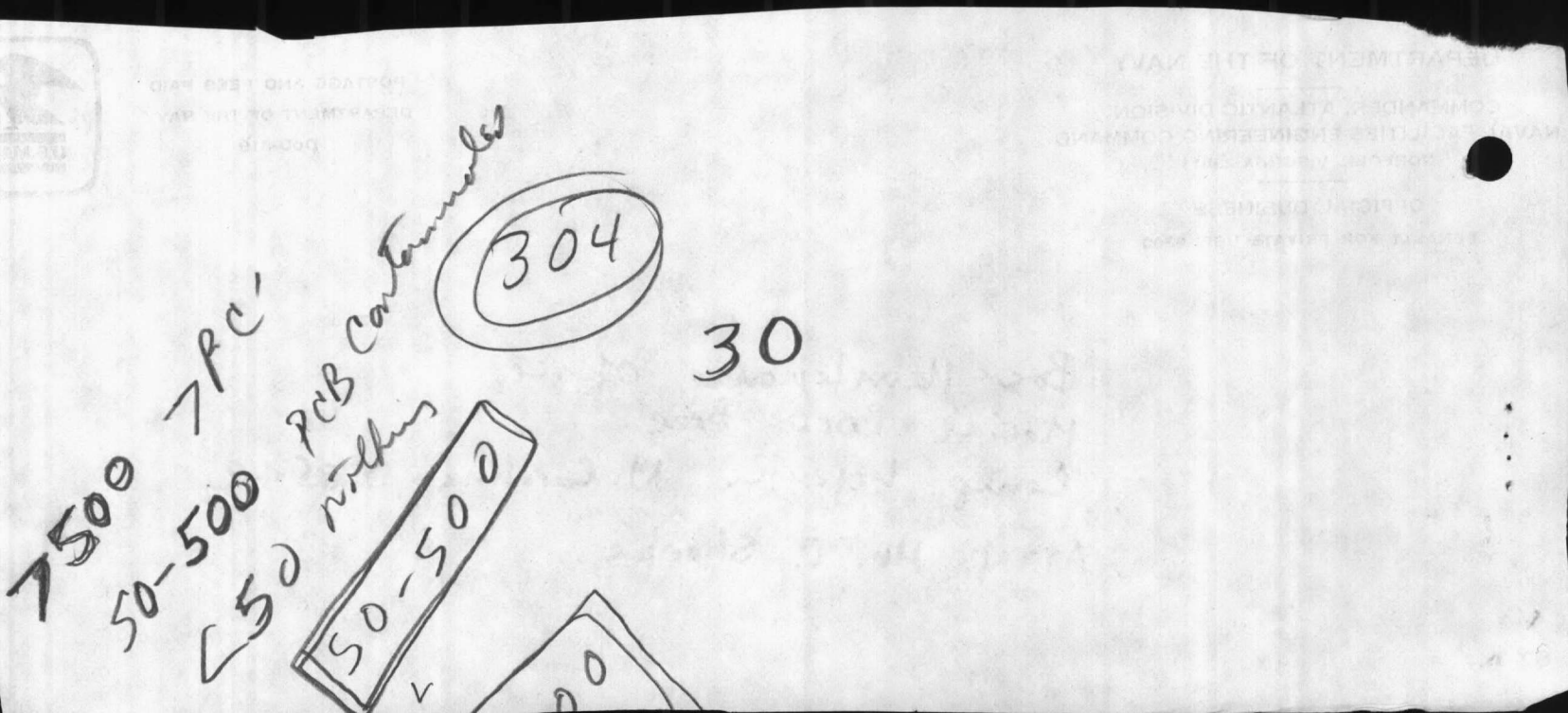
POSTAGE AND FEES PAID
DEPARTMENT OF THE NAVY
DoD-316

U.S.MAIL

Base Maintenance Office
Marine Corps Base
Camp Lejeune N. Carolina 28542

ATTN: Mr. D. Sharpe

87


7500 ppb
50-500 PCB contaminated
<50 ppb
304
30
50-500

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

pink copy

204:GGB:cbm
6240
14 JUL 1980

From: Commanding Officer
To: Commanding General, Marine Corps Base, Camp Lejeune, N. C. 28542

Subj: Hazardous Materials Environmental Management Support to MCAS(H), New River

Ref: (a) CNO Washington DC 231918Z Jun 1980
(b) COMCABEAST ltr MAO-eef/GPS 11010 dtd 29 Apr 1977 (Logistics Support Agreement)

1. Reference (a) lists various initial reporting/action deadlines which integrate the requirements and responsibilities within the overall Navy program for management of hazardous materials.

2. Under the provisions of reference (b), Marine Corps Air Station (Helicopter) (MCAS(H)), New River is incorporated in the Marine Corps Base (MCB), Camp Lejeune Natural Resources Management and Environmental Program which also includes the management of hazardous materials.

3. Accordingly, MCAS(H), New River should be included in MCB, Camp Lejeune's response to reference (a). It is requested that these, and future reports, be annotated so that higher headquarters will understand that the response is a consolidated report from both MCB, Camp Lejeune and MCAS(H), New River. It is further requested that a copy of all future correspondence concerning this subject be provided for our command files.

J. W. Marvel

J. W. MARVEL

6240

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

MAIN/FEC/klp
11000
30 July 1980

From: Base Maintenance Officer
To: Defense Property Disposal Office

Subj: PCB Contaminated Transformers

Ref: (a) Conversation between Mr. Dave Millice (DPDO) and Mr. F. E. Cone BMO of 29 July 1980

1. As discussed during reference (a), inspection of the approximately three hundred transformers presently located at DPDO indicates that some of the transformers are suspected of containing PCB contaminants. Samples from these transformers have been forwarded to Norfolk for analysis.

2. Further, as agreed to during reference (a), the transformers should not be turned over to a private contractor until final analysis is received (expected in mid-August).

F. E. CONE
By direction

bcc:
Natural Resources

Attn: DPDO

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

MAIN/FEC/klp
11000
30 July 1980

From: Base Maintenance Officer
To: Defense Property Disposal Office

Subj: PCB Contaminated Transformers

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F. E. CONE
By direction

bcc.
NREAD

MAIN/JIW/th
6240
30 July 1980

Director, Natural Resources and Environmental Affairs Division

Base Maintenance Officer

Transformers

1. During recent sampling operations of transformers generated by Base Maintenance and sold by DPDO, Camp Lejeune, but still in possession of DPDO, it was discovered that four transformers (Serial Nos. 1814265, 69PK8316, 69PK8317 & 69PK8315) are labeled as containing PCB.

2. It is recommended DPDO be officially notified of the PCB discovery and request the transformers not be released until laboratory tests are completed by LANTDIV which is estimated to be about 11 August 1980.

3. The transformers should not be released.

JULIAN I. WOOTEN

MAIN/DDS/th
6240

JUL 2 9 1980

From: Commanding General
To: Distribution List

Subj: Hazardous Material Management Program at Camp Lejeune

Ref: (a) Resource Conservation and Recovery Act (RCRA) (Pub. L. No. 94-580) (42 USC 6901-6987) (NOTAL)
(b) MCBul 6280 of 1 May 1980

Encl: (1) Hazardous Material Management Program, Part I
(2) Hazardous Material Management Program, Part II
(3) Hazardous Material Management Program, Part III
(4) Hazardous Material Management Program, Part IV

1. Hazardous waste and hazardous material management is a controversial national issue. Regulations recently developed by regulatory agencies of federal and state level will impact on several functions at Camp Lejeune. All Commands are requested to designate a point of contact with authority to represent the Command during program development to ensure compliance with requirements of references (a) and (b).

2. Enclosures (1), (2), (3) and (4) are forwarded for action. Information requested is required to implement the subject program and to meet deadlines established by references (a) and (b).

3. Addressees are requested to initiate action required to provide complete and accurate data as outlined on enclosures. Enclosure (1) should be forwarded directly to the Base Maintenance Officer no later than 11 August 1980. Enclosures (2), (3) and (4) should be submitted through the chain of command to the Base Maintenance Officer by 1 October 1980.

4. Technical assistance with conducting surveys and inventories needed to gather data is available from Natural Resources and Environmental Affairs Division, Base Maintenance Department. Point of contact is Mr. Danny Sharpe, extensions 5003 or 2083.

T. R. BAISLEY
By direction

DISTRIBUTION:

CG, 2dMARDIV
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JUL 2 9 1980

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART I
LISTING OF HAZARDOUS WASTES[1] GENERATED LOCALLY

Activity _____ Contact _____ Phone No. _____

(A) Hazardous Wastes Currently Identified	(B)[2] (✓)	(C)[3] Waste Lubricants & Hydraulic Fluids Item/National Stock No. (NSN)	(D)[3] All Other Wastes Item/National Stock No. (NSN)
Acetic Acid			
Acetone			
Ammonia			
Asbestos			
Calcium Hydroxide			
Calcium Hypochlorite			
[redacted]			
Ferric Chloride			
Formaldehyde			
Hydrochloric Acid			
Lead Based Paints			
Lithium Sulfur Dioxide Batteries			
Mercury			
Methyl Ethyl Ketone (MEK)			
PCB			
Pentachlorophenol			
Perchloroethylene			
Sulfuric Acid			
Toluene			
Trichloroethane			
Trichloroethylene			
[redacted]ene			

Note 1: Wastes also include materials unusable because shelflife has expired & which cannot be used for other purposes.

Note 2: Enter a check beside wastes shown in column A which your Command generates.

Note 3: List Names (or descriptions) & National Stock No.'s of hazardous wastes your Command generates which are not listed in Column A.

- ATTACH ADDITIONAL SHEETS

ENCLOSURE (1)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART II
EXISTING AND PLANNED HAZARDOUS WASTE AND
DISCARDED HAZARDOUS MATERIAL STORAGE AREAS

Activity _____ Contact _____ Phone No. _____

Storage Site Location & UIC[1]	Waste Name or Description[2]	National Stock Number (NSN)	Amount to be Stored[3]	Describe Facility Construction; Type of Containers Used; Adequacy of Facility; Safety & Spill Control Measures (Existing and Needed); comments

1. Give Building, Lot, or Structure No. and the Name of Unit in Charge (UIC) of Facility.

2. Show all Items Presently Stored at the Site.

3. Note that this should not exceed largest amount normally expected to be stored for any given 90-day period. Give pounds or gallons of each waste shown.

ENCLOSURE (2)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART III
GENERATORS OF HAZARDOUS WASTES[1]

Activity _____ Contact _____ Phone No. _____

Facility[2] _____

A Wastes Generated[3]	B Volume Generated (Average)[4]	C Volume Generated (Maximum)[5]	D Location of Interim Storage[6]	E Building No.	F Type Container Used[7]	G Describe Method Used For Final Disposal[8]

*See reverse side for instructions.

ENCLOSURE (3)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART III

Instructions: Complete form shown on reverse side of this sheet as follows:

*1. Fill out separate form(s) for each site or facility.

2. Building numbers and the units involved should be shown. Example: Building 1601; Motor Transport Maintenance Company and Component Rebuild Platoon, General Support Maintenance Company; 2d Maintenance Battalion; 2dFSSG. Do not group units not in same Command.

3. List each significant waste separately and complete columns C through G for each.

4. Give best estimate of the average volume or weight of waste produced during a fiscal year.

5. Give best estimate of the maximum volume or weight producted during a fiscal year quarter (90-day period).

6. Complete columns D and E only if wastes are stored at location other than on the site indicated by footnote 2.

7. Examples: 55 gallon barrel, 550 gallon steel tank, cardboard boxes, gallon glass jugs, etc.

8. Examples: Delivered to DPDO; placed in waste oil drums (550 gal); stored at Lot #140; picked up by private contractor.

*Refers to footnotes depicted on form.

ENCLOSURE (3)

HAZARDOUS MATERIALS MANAGEMENT PROGRAM - PART IV
INVENTORY OF HAZARDOUS MATERIALS STORAGE AREAS[1]

Activity _____ Contact _____ Phone No. _____

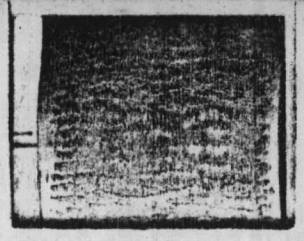
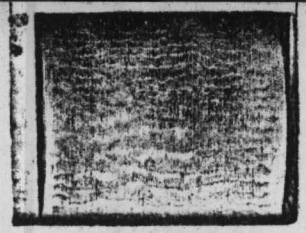
Building or Lot No. _____ Location _____ Unit in Charge _____

Materials Stored (List Hazardous Materials)	National Stock Number (NSN)[2]	Volume/Weight Normally on Hand[3]	Volume/Weight Handled Annually[3]	Type Container	Describe the following: Type of construction; measures taken to prevent & cleanup spill; adequacy of facility.

Note:

1. List each site or facility on separate sheet
2. Some materials have several NSN's. List each NSN applicable.
3. Give best estimate available.

ENCLOSURE (4)

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

7/31/80

From: Assistant Maintenance Officer
To: NREA

Subj: Have we had such a request from EPA?

BR

Danny,

NO — This was discussed in Norfolk

This program is part of Hazardous Waste Program.

Tuyka
File

Maint 6240

PRIORITY

****
UNCLASSIFIED
****

PT 00271 212/1806Z

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PAGE 01

PRIORITY
ORIGINAL
ACTION

PTTUZYUW RUEACMC3359 2121806-UUUU--RUEBDOA.
ZNR UUUUU
P R 291509Z JUL 80
FM CMC WASHINGTON DC
TO AIG EIGHT ACT: CG MCB
INFO RUENAAA/CNO WASHINGTON DC
RULSSAA/COMNAVFACENGCOM ALEXANDRIA VA
RULYSHH/LANTNAVFACENGCOM NORFOLK VA
RUEOHUA/NORTHNAVFACENGCOM PHILADELPHIA PA
RULSNDA/CHESNAVFACENGCOM WASHINGTON DC
RUCITNJ/SOUTHNAVFACENGCOM CHARLESTON SC
RUWNSDR/WESTNAVFACENGCOM SAN BRUNO CA
RUWDSAA/WESTNAVFACENGCOMBRO SAN DIEGO CA
RUWMHHA/WESTNAVFACENGCOMBRO SEATTLE WA
RHHMBRA/PACNAVFACENGCOM PEARL HARBOR HI
BT
UNCLAS
UNCLAS //N06280//
SUBJ: MCBUL 6280. PAST HAZARDOUS WASTE (HW) DISPOSAL PRACTICES (CMC CODE LFF-2)
1. THE U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA), THROUGH CERTAIN OF ITS REGIONAL OFFICES, HAS SENT LTR QUESTIONNAIRES TO FED FACS REQ

PAGE 02 RUEACMC3359 UNCLAS
INFO RE SUBJ PRACTICES. THE QUESTIONNAIRES, MANY SENT BY CERT MAIL, REQUEST REPLY WITHIN 30 DAYS. DOD CURRENTLY WORKING WITH EPA TO DEMONSTRATE ONGOING INTERNAL PROGRAM TO IDENTIFY ENVIRONMENTAL CONTAMINANT MIGRATION FROM SUCH SITES, DETERMINE IF HAZARD POTENTIAL FOR ADVERSE IMPACT ON HUMAN HEALTH EXISTS, AND CONTROL/RESTORE THOSE AREAS REQUIRING APPLICATION OF MITIGATION MEASURES. MUCH OF THE EPA REQUIRED INFO NOT CURRENTLY AVAIL, AND CONTINUANCE OF ONGOING DOD PROGRAMS WILL ALLOW MOST SYSTEMATIC APPROACH TO DEVELOPMENT OF CREDITABLE DATA IN A TIMELY AND ORDERLY MANNER.
2. MARINE CORPS POSITION REGARDING CURRENT/FUTURE DISPOSAL PRACTICES IS TO COMPLY WITH THE RECENTLY PROMULGATED RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) HW MGT REGULATIONS AND REPORT REQUIREMENTS ESTABLISHED THEREIN.
3. ADDRESSEES IN RECEIPT OF SUCH INQUIRIES SHOULD ACKNOWLEDGE REQUESTS BY REFLECTING POSITION STATED ABOVE, BUT NOT RESPOND TO SPECIFIC QUESTIONS. REPLIES SHOULD INDICATE CONCERN FOR PROPER RESOLUTION OF HW DISPOSAL PROBLEMS, RECOGNIZE DOD COORDINATION WITH EPA TO DEVELOP WORKABLE APPROACH, AND SUGGEST THAT INFO DEVELOPED DURING THIS PROGRAM WILL BE FORWARDED WHEN AVAIL. ALSO, REPLIES SHOULD INDICATE MARCORPS WILLINGNESS TO INVESTIGATE SPECIFIC HW

PAGE 03 RUEACMC3359 UNCLAS
DISPOSAL PROBLEMS OF WHICH EPA HAS KNOWLEDGE, AND SUGGEST THAT RESULTS OF THESE STUDIES WOULD BE FORWARDED WHEN COMPLETED.

4. CMC POINT OF CONTACT IS MR. P.C. HUBBELL (CODE LFF), ON AUTOVON 224-2171/3188.
5. THIS BULLETIN IS CANCELED 30 JUL 81.
BT
#3359

NNNN
291509Z Quest
ACT: FAC
INFO: ADJ, TRNG, MANP, SAFD, CBC, CPO /13

8 dlw

MAIN

ROUTINE

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* U N C L A S S I F I E D *
****
PT 00186 203/2337Z

PAGE 01 DISTRIBUTION

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- Tele D.
- I.T.O.
- F&A O.
- Prop O.
- MMF
- Maint NCO
- Secretary

RTTUZYUW RUILSGG9035 2031844-UUUU--RUEBDOA.
ZNR UUUUU
R 2118427 JUL 80
FM MCAS H NEW RIVER NC
TO RUWDPAA/NAVENVSUPPO PORT HUENEME CA
INFO RUEACMC/CMC WASHINGTON DC
RUEBDOA/CG MCB CAMP LEJEUNE NC
BT
UNCLAS//N06280//
CMC FOR LFF-2
CAMLEJ FOR BASEMAINTOFF
SUBJ: DATA CALL FOR DLA-ASSIGNED HAZARDOUS MATERIALS RPT SYMBOL
DD 6240-01
A. CMC 141512Z JUL80
1. IAW REF A NEG RPT SUB.
BT
#9035

INFO: MAIN, TRNG, MANP, SAFD, CBC, CPO
NRMC /13
NNNN

MSG ROUTED BY SSIC 06260

803

This is not the right one to the question!

NREA

Is a negative report correct?

BCE

This means Base does not need to include MCAS(H) in the Response To Part I of the message re: DLA.

The negative response was accurate

****
* U N C L A S S I F I E D *
****
ROUTINE

211842Z jul 80

T-file # 6240

MAIN/DDS/th
6240

JUN 1 2 1980

From: Commanding General
To: Commanding Officer, Marine Corps Air Station (Helicopter), New River, Jacksonville, North Carolina 28545

Subj: Disposal of Hazardous Material and Hazardous Waste

Ref: (a) FONECON btwn Mr. Cervenak, DPDO, and Mr. Sharpe, BMaintDept, on 5 Jun 1980
(b) DOD Inst 4160.21M

Encl: (1) CO MCAS(H) NR ltr 204:PFA:cbm 11000 of 30 May 1979

1. Marine Corps Base was advised during reference (a) that generally unused hazardous materials such as those listed in enclosure (1) could be received, stored and disposed of by Defense Property Disposal Office (DPDO). Reference (b) gives further information regarding what materials are acceptable. Please contact DPDO at 451-5613 for specific instructions.

2. The mixture of ammonia-based stripper, lacquer paint, lacquer thinner, enamel paint and enamel thinner is a hazardous waste. This material should be stored properly until further instructions can be provided.

3. If additional information is required, please contact Mr. Danny Sharpe, Base Maintenance Department, extension 5003.

T. R. BAISLEY
By direction

Safety

UNITED STATES MARINE CORPS
Marine Corps Air Station
(Helicopter)
New River, Jacksonville
North Carolina 28545

204:MEM:cbm
11000
28 May 1980

From: Commanding Officer
To: Commanding General, Marine Corps Base, Camp Lejeune, N. C. 28542
(Base Maintenance Officer)

Subj: Disposal of Environmentally Hazardous Waste Material

Ref: (a) CO, MCAS(H), NR ltr 204:PFA:cbm 11000 of 30 May 1979

1. The reference identified hazardous material being stored at this installation and listed approximate annual requirements. The following is an updated listing of our materials on hand requiring disposal instructions.

NOMEN	NIIN	QTY ON HAND
Cleaning Compound	00-753-4998	(7) 55 gl dr
Lube Oil	00-189-6729	(10) 55 gl dr
Lube Oil	00-181-8097	(9) 55 gl dr
Lube Oil	00-191-2772	(22) 55 gl dr
Toulene Tech	00-290-0046	(2) 55 gl dr
Methyl Ketone	Not Available	(2) 55 gl dr
Paint Remover	00-926-1489	(2) 55 gl dr
Ammonium Hydrox	00-817-9929	(26) 1 gl (32) 2 gl
Corr Control	00-526-1605	(74) 5 gl dr
Battery Acid	00-823-8007	(1) 5 gl cn
Trichlorethane	00-664-0388	(20) 5 gl cn
Corr Control	00-281-2031	(2) 5 gl cn
Trichlorethane	00-551-1487	(1) 55 gl dr
Mixture of Ammonia-based stripper, lacquer paint, lacquer thinner, enamel paint & enamel thinner		(9) 55 gl dr

2. It is requested that disposition instructions for these materials be provided as soon as possible. Point of contact at this command is Mrs. Mary MILLIS, Station Safety Specialist, 455-6506/6518.

CARL H. YUNG
By direction

RJ BH

COMMANDANT FIFTH NAVAL DISTRICT
COMMANDER NAVAL BASE
NORFOLK, VIRGINIA 23511

A02a
6240
23 MAY 1980

From: Commandant Fifth Naval District/Commander Naval Base, Norfolk, Virginia
To: Distribution

Subj: Navy Hazardous Materials Environmental Management Workshop

Ref: (a) COMFIVE/COMNAVBASE NORVA ltr ser A02a 6240 of 25 April 1980
(b) OPNAVNOTE 6240 ser 45/730791 of 20 Feb 1980

Encl: (1) Workshop Agenda

1. Reference (a) notified all concerned that the Atlantic Division, Naval Facilities Engineering Command (LANTNAVFACENGCOM) will host a two day workshop to provide technical assistance in implementing reference (b) and complying with applicable hazardous materials regulations. This workshop will be held at the Fleet Training Center (Building N-30) auditorium on 08 and 09 July from 0800 to 1600 each day. Registration is required and attendees will be assessed a $5.00 fee.

2. The agenda for the workshop is contained in enclosure (1).

3. It is requested that the designated point of contact for hazardous material management at each activity participate. Timely and coordinated efforts are necessary to effectively implement reference (b).

4. For further information, please contact Mr. J.R. Lancaster (LANTNAVFACENGCOM (Code 114)), Autovon 690-7313, Commercial (804) 444-7313.

W. J. LAUFERSWEILER
BY DIRECTION

Distribution (COMFIVE/COMNAVBASENORVAINST 5216.2K)
List I (only 4,6,7,10,15,18,19,25,29,32,47,55,57,59,66,75,79,80,84,97,113)
List II (only 13,15,17,19)
List III (only 21)
List IV (only 6)
List V
List VI (only 1,4,46,57,58)
List IX

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Copy to:
COMNAVFACENGCOM (112)

AGENDA

"HAZARDOUS MATERIALS/HAZARDOUS WASTE MANAGEMENT PROGRAM
(COMFIVE)

TWO DAY WORKSHOP 08 - 09 JULY 1980

WORKSHOP OBJECTIVES

1. Compliance with Federal/State Regulations
2. Highlight OPNAVNOTE 6240 of 20 Feb 1980
3. Initiate Hazardous Materials Management Program
   a. Hazardous Waste Management Plan
   b. Hazardous Materials Spill Prevention Control and Countermeasure
   c. Hazardous Materials Spill Contingency Plan

Enclosure (1)

08 July 1980

0800 - 0900	Registration (Coffee & Donuts)
0900 - 0905	Welcome (COMFIVE)
0905 - 0930	Keynote - "Overview of Navy Program" (NAVFAC HQ)
0930 - 1000	Applicable Hazardous Materials/Waste Laws and Regulations (LANTDIV 114)
1000 - 1030	Overview of COMFIVE Hazardous Waste Management Plan (Including Contingency Planning) (COMFIVE)
1030 - 1045	BREAK
1045 - 1200	PWC Role (PWC)
1200 - 1300	LUNCH
1300 - 1430	RCRA Regulations & Permits (LANTDIV 114)
1430 - 1500	PCB's - TSCA (LANTDIV 114)
1500 - 1530	Asbestos Demolition & Disposal (Air & Solid Waste Aspects) (LANTDIV 114)

09 July 1980

0730 - 0800 Coffee & Donuts

0800 - 0815 Pesticide Program Impact (LANTDIV 10A)

0815 - 0845 OSHA & Impact on Projects (EHC)

0845 - 0915 Safety & Impact on Program (Safety Center)

0915 - 1000 Implementing OPNAVNOTE 6240 - HM/HW Surveys (LANTDIV 114)

1000 - 1015 BREAK

1015 - 1045 Hazardous Materials/Wastes Management Plans (LANTDIV 114)

1045 - 1115 Hazardous Materials SPCC (LANTDIV 114)

1115 - 1145 Hazardous Materials Contingency Plans (LANTDIV 114)

1145 - 1245 LUNCH

1245 - 1315 Programming & Funding of Projects (NAVFAC HQ.)

1315 - 1345 Design Guidance (LANTDIV 114)

1345 - 1430 Discussion & Wrap-up

1430 - 1530 Identification of Action Items & Milestones

T-6240

MAIN

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ROUTINE * U N C L A S S I F I E D *
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PT 00054 151/0204Z

PAGE 01

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- ___ Trng O.
- ___ [illegible]
- ___ Sup O.
- ___ Prop O.
- ___ MME
- ___ Maint NCO
- ___ Secretary

RTTUZYUW RULYSGG5021 1510156-UUUU--RUEBDOA.
ZNR UUUUU
R 291440Z MAY 80
FM LANTNAVFACENGCOM NORFOLK VA
TO RUEBNUY/WPNSTA YORKTOWN VA
RUCLFCA/CG MCAS CHERRY PT NC
RUERLBA/NAVSHIPYD NORFOLK VA
ZEN/PWC NORFOLK VA
RUEDFOA/NAVORDSTA LOUISVILLE KY
RUEBEOA/FLECOMBATRACENLANT VIRGINIA BEACH VA
RUCRNAG/NAVFAC CAPE HATTERAS NC
RUEPBSA/NSC NORFOLK VA
RUEPNUD/NSC CHEATHAM ANNEX WILLIAMSBURG VA
ZEN/NAVPHIBASE LITTLE CREEK VA
RUEBNUW/ARMED FORCES EXPERIMENTAL TRAINING ACTIVITY
WILLIAMSBURG VA
RUCLAKK/HARVEY POINT DEFENSE TESTING ACTIVITY HERTFORD NC
RUSKSDE/NAVSECGRUACT NORTHWEST VA
RUERDOA/CG MCB CAMP LEJEUNE NC
RUERDOA/NAVREGMEDCEN CAMP LEJEUNE NC
RULYDBA/NAVRADSTA R SUGAR GROVE WV
RUCLDHA/NAVSTA ROOSEVELT ROADS PR

PAGE 02 RULYSGG5021 UNCLAS
RULGSAA/NAVCOMMSTA PUERTO RICO PONCE PR
RUCRNAJ/NAVFAC ANTIGUA
RUQISDE/NAVSECGRUACT SABANA SECA PR
RULPSAA/NAVSTA PANAMA CANAL RODMAN PN
RUCRNAD/NAVFAC ARGENTIA CA
RUEBAHA/NAVSTA GUANTANAMO BAY CUBA
RUEBBRA/NAS BERMUDA
RUDISHH/NAVSTA KEFLAVIK IC
RUFLSKA/NAVSUPPACT NAPLES IT
RUTKSHH/NAVSTA ROTA SP
RUFLFHA/NAF SIGONELLA IT
RUQKSAA/NAVCOMMSTA NEA MAKRI GR
RUFLBFA/NAVSUPPO LA MADDALENA IT
R 231906Z MAY 80
FM COMNAVFACENGCOM ALEXANDRIA VA
TO PACNAVFACENGCOM PEARL HARBOR HI
LANTNAVFACENGCOM NORFOLK VA
WESTNAVFACENGCOM SAN BRUNO CA
NORTHNAVFACENGCOM PHILADELPHIA PA
SOUTHNAVFACENGCOM CHARLESTON SC

PAGE 03 RULYSGG5021 UNCLAS
CHESNAVFACENGCOM WASHINGTON DC
INFO BUMED WASHINGTON DC

****
ROUTINE * U N C L A S S I F I E D *
****

291440Z May 80

ROUTINE

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* U N C L A S S I F I E D *
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CMC WASHINGTON DC
COMNAVSUPSYSCOM WASHINGTON DC
DLA CAMERON STATION VA
NAVREGMEDCEN PORTSMOUTH VA
NAVREGMEDCEN CAMP LEJEUNE NC
NAVREGMEDCEN PHILADELPHIA PA
NAVDISVECTECOLCONCEN JACKSONVILLE FL
NAVDISVECTECOLCONCEN ALAMEDA CA
NAVENPVNTMEDU TWO NORFOLK VA
NAVENPVNTMEDU FIVE SAN DIEGO CA
NAVENPVNTMEDU SIX PEARL HARBOR HI
NAVENPVNTMEDU SEVEN NAPLES IT
NAVREGMEDCEN OKINAWA JA
BT
UNCLAS //N06250//
CMC PASS TO CODE LFF
SUBJ: STATUS OF EIS FOR DOD DDT DISPOSAL
A. HQ DPDS BATTLE CREEK MI 062002Z MAY 80 (NOTAL)

PAGE 04 RULYSGG5021 UNCLAS
1. THE DEFENSE PROPERTY DISPOSAL SERVICE (DPDS), DLA IS TASKED WITH THE DISPOSAL OF DDT NOW UNUSABLE DOD-WIDE EXCEPT FOR PUBLIC HEALTH EMERGENCIES. THIS INCLUDES ALL DDT STOCKS EXCEPT PREPOSITIONED WAR RESERVES. DPDS IS ALSO PREPARING THE ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR THE DISPOSAL OF ALL DOD EXCESS DDT PRODUCTS.
2. INFORMATION ON THE AMOUNT, NSN, AND GEOGRAPHIC LOCATION IS REQUIRED ON CURRENT STOCKS NOT PREVIOUSLY REPORTED TO DLA OR FOR WHICH ACCOUNTABILITY HAS NOT BEEN TRANSFERRED TO THE DLA (DPDS).
3. IT IS VITAL THAT THIS DATA BE REPORTED TO THE NEAREST DEFENSE PROPERTY DISPOSAL OFFICE ASAP. REPLIES LATER THAN 1 JUNE 80 WILL DELAY FINAL DEVELOPMENT OF THE EIS.
4. REF A PERTAINS. DIRECT REPORTING TO HQ DPDS-R BATTLE CREEK, MI IS DESIRED. NEGATIVE REPORTS NOT REQUIRED.
5. REQUEST YOU NOTIFY INSTALLATIONS UNDER YOUR COGNIZANCE OF THIS ACTION AND REQUEST THAT A SEARCH FOR EXCESS DDT STOCKS BE CONDUCTED.
BT
#5021

NNNN

ACT: FAC
INFO: MAIN, CBC
NRMC/35

****
* U N C L A S S I F I E D *
****

ROUTINE

OPNAV 5216/144 (REV. 6-70)
S/N 0107-LF-778-8099

DEPARTMENT OF THE NAVY

Memorandum

DATE 3 June 1980

FROM Ground Structures General Foreman

TO Director, Maintenance and Repair Division

SUBJ Status of EIS for DOD DDT Disposal

1. At the present time, there is no DDT being used or stored by this Branch for use of the Base.

Lewis D. Shepard

LEWIS D. SHEPARD

	ACTION	INFO	INITIAL
BMO		✓	2 MAY 1980
ABMO		✓	
MAINT NCO			
SAFETY CHMN			
PROP			
M&R			
OPNS			
ADMIN			
TELE			
UTIL	✓		74 Ops
ENVIRON AFF	✓		
SECRETARY			
F&A BRANCH			
UMACS			

I have a copy of this and a furnished safety one also. - D Hargis

Been postponed - File

JDW

12 May 80

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 5-1-80

TO:

[BASE MAINT O]	DIR, FAMILY HOUSING
PUBLIC WORKS O	DIR, BACHELOR HOUSING
COMM-ELECT O	BASE FIRE CHIEF
MOTOR TRANSPORT O	

ATTN: _____

1. Attached is forwarded for info/action

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

3. Your file copy.

V/R
JSM

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

P-MCBC L-1757

COMMANDANT FIFTH NAVAL DISTRICT
COMMANDER NAVAL BASE
NORFOLK, VIRGINIA 23511

A02a
6240
25 APR 1980

From: Commandant Fifth Naval District/Commander Naval Base, Norfolk Virginia
To: Distribution

Subj: Navy Hazardous Materials Environmental Management Program

Ref: (a) OPNAVNOTE 6240 ser 45/730791 of 20 Feb 1980
(b) Resources Conservation and Recovery Act (PL 94-580)
(c) Clean Water Act (PL 92-500)
(d) Federal Register, Vol. 45, No. 39 of 26 Feb 1980, pgs. 12722-12754, Hazardous Waste Management; Overview and Definitions (Title 40, Code of Federal Regulations, Part 260-40 CFR 260); Generator Regulations (40 CFR 262); Transporter Regulations (40 CFR 263)
(e) 40 CFR 116-Designation of Hazardous Substances, and 40 CFR 117-Determination of Reportable Quantities for Hazardous Substances
(f) 40 CFR 1510-National Oil and Hazardous Substances Pollution Contingency Plan, Final Revision 19 Mar 1980

1. The Chief of Naval Operations (CNO) has initiated the Navy Hazardous Materials Environmental Management Program by reference (a). This program implements the regulations under reference (b) and reference (c) relative to the control of hazardous waste (HW) and hazardous materials (HM). To meet the objective of compliance with the applicable laws and regulations, responsibilities and action items are specifically assigned to appropriate levels of command by reference (a). Accordingly, Commanders and Commanding Officers of Navy shore activities are responsible for complying with applicable HW and HM regulations and allocating the necessary resources to accomplish specific inventory, planning, equipment and reporting requirements.

2. HW and HM regulations have been promulgated or proposed by both Federal and State agencies. The current status of these Federal regulations is as follows:

a. HW regulations promulgated by the U.S. Environmental Protection Agency (EPA), under reference (b), are comprehensive and detailed. Parts have been published in final form, reference (d). However, one key part (40 CFR 261), which will define, identify characteristics of HW, list specific HW and set a mandatory timetable for compliance, is expected to be promulgated this month (April 1980).

b. Similarly, by reference (e), EPA promulgated HM regulations under the authority of reference (c). These regulations identify hazardous substances and the reportable quantities. Reference (f) promulgates reporting and cleanup requirements for HM spills. However, the requirements

for HM Spill Prevention Control and Countermeasures (SPCC) are not yet final (proposed rules-40 CFR 151).

3. The Atlantic Division, Naval Facilities Engineering Command (LANTNAVFACENGCOM) will host a two-day workshop to provide technical assistance in implementing reference (a) and complying with applicable HW and HM regulations. Workshop dates and agenda will be disseminated after promulgation of 40 CFR 261.

4. Reference (a) requires Commanders and Commanding Officers to designate an activity focal point to coordinate activity HM management programs. Addressees are requested to advise COMFIVE/COMNAVBASE of this point of contact by 1 May 1980. The point of contact for COMFIVE/COMNAVGASE is Mr. J. R. Lancaster, (LANTNAVFACENG COM), Environmental Quality Branch, Code 114, AUTOVON 690-7313, commercial (804) 444-7313.

W. J. LAUFERSWEILER
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COMMANDANT FIFTH NAVAL DISTRICT
COMMANDER NAVAL BASE
NORFOLK, VIRGINIA 23511

A02a
6240
25 APR 1980

From: Commandant Fifth Naval District/Commander Naval Base, Norfolk Virginia
To: Distribution

Subj: Navy Hazardous Materials Environmental Management Program

Ref: (a) OPNAVNOTE 6240 ser 45/730791 of 20 Feb 1980
(b) Resources Conservation and Recovery Act (PL 94-580)
(c) Clean Water Act (PL 92-500)
(d) Federal Register, Vol. 45, No. 39 of 26 Feb 1980, pgs. 12722-12754, Hazardous Waste Management; Overview and Definitions (Title 40, Code of Federal Regulations, Part 260-40 CFR 260); Generator Regulations (40 CFR 262); Transporter Regulations (40 CFR 263)
(e) 40 CFR 116-Designation of Hazardous Substances, and 40 CFR 117-Determination of Reportable Quantities for Hazardous Substances
(f) 40 CFR 1510-National Oil and Hazardous Substances Pollution Contingency Plan, Final Revision 19 Mar 1980

1. The Chief of Naval Operations (CNO) has initiated the Navy Hazardous Materials Environmental Management Program by reference (a). This program implements the regulations under reference (b) and reference (c) relative to the control of hazardous waste (HW) and hazardous materials (HM). To meet the objective of compliance with the applicable laws and regulations, responsibilities and action items are specifically assigned to appropriate levels of command by reference (a). Accordingly, Commanders and Commanding Officers of Navy shore activities are responsible for complying with applicable HW and HM regulations and allocating the necessary resources to accomplish specific inventory, planning, equipment and reporting requirements.

2. HW and HM regulations have been promulgated or proposed by both Federal and State agencies. The current status of these Federal regulations is as follows:

a. HW regulations promulgated by the U.S. Environmental Protection Agency (EPA), under reference (b), are comprehensive and detailed. Parts have been published in final form, reference (d). However, one key part (40 CFR 261), which will define, identify characteristics of HW, list specific HW and set a mandatory timetable for compliance, is expected to be promulgated this month (April 1980).

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for HM Spill Prevention Control and Countermeasures (SPCC) are not yet final (proposed rules-40 CFR 151).

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List II (only 8-1,12,13,15,17,18,19)
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List IX

File

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

LEE-bp/PGF
6240
15 JAN 1980

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

Subj: Chemical Waste; disposal of

Ref: (a) CG Camp Lejeune ltr MAIN/JIW/th over 6240 dtd 25 Oct 1979

Encl: (1) List of Hazardous Materials to be disposed of at the Cherry Point Industrial Waste Treatment Plant for MAG-26 and MAG-29, MCAS(H); New River, Jacksonville, NC

1. Reference (a) requested that chemicals listed on enclosure (1) be disposed of at the Cherry Point Industrial Waste Treatment Plant (CPIWTP) and that a program be established for disposal of chemical waste generated by Marine Corps Base, Camp Lejeune and Marine Corps Air Station (H), New River.

2. Enclosure (1) notes those chemicals which can be accepted for treatment at the CPIWTP and those which cannot be accepted. Acceptable chemicals should be delivered to the CPIWTP at any time, Monday through Friday, 0730 to 1600. Note that most chemicals listed on enclosure (1) require chemical analysis before a determination can be made as to acceptability.

3. Information concerning acceptance of chemical waste at the CPIWTP is provided in the following paragraphs:

a. Chemicals vary so greatly that many require special treatment. The CPIWTP was designed to treat chemicals such as the phenol group, amonia base strippers, plating compounds containing heavy metals and weak acids and bases, limited quantities of oil and grease, and certain aircraft cleaning detergents. Batch treatment is available for concentrated acids and bases and for chemicals containing chromium and cyanide. Solvents are not acceptable at the CPIWTP.

b. Total loads which can be sent to the CPIWTP are restricted two ways; hydraulics and total chemical load. A directly proportional relation exists between hydraulic and chemical load limitations, i.e., as the hydraulic load (total wastewater flow) increases, the chemical load increases. The sanitary and mechanical engineering design of the CPIWTP limits the total hydraulic capacity. In general, Environmental

Protection Agency (EPA) effluent limitations imposed on Cherry Point by regulatory permit limit the chemical loading. The chemical limitations directly affect the ability to load the CPIWTP with certain chemical groups, compounds and elements. For example, phenols loading to the CPIWTP cannot exceed 4 gallons per day and oil loading to the CPIWTP cannot exceed 5 gallons per day in order to satisfy EPA permit requirements.

c. Some chemical waste will require analysis to determine chemical content and strength. The analysis will be used to determine acceptability for treatment at the CPIWTP. Submitting activities will be required to submit chemical analysis upon request.

d. Chemical waste can be disposed of by private contractor. In some cases, contractors will pay for waste chemicals (especially oils) which have been segregated from other chemicals and which have not exceeded their shelf life. The address of a few of these contractors' can be provided upon request. The Defense Property Disposal Office also accepts certain hazardous waste, but only on a case by case basis and only if the waste has utilization or sales value.

e. Atlantic Division, Naval Facilities Engineering Command (LANTDIV) is the technical expert for obtaining contracting services for chemical analysis and disposal of chemical waste. Activities requiring these services can turn to LANTDIV for help in obtaining the service.

4. In accordance with the above information, the following policy concerning acceptance of chemical waste at the CPIWTP is established:

a. MCAS, Cherry Point will accept certain chemicals from Marine Corps Base, Camp Lejeune and from MCAS(H), New River on a case by case basis. Contact should be made with Mr. John Floyd, Autovon 582-4261 when chemical waste requires disposal. Mr. Floyd will make the determination as to acceptability at the CPIWTP based on considerations noted in paragraphs 3a, 3b and 3c above.

b. Oil and grease will not be accepted for disposal at CPIWTP.

c. Chemical waste not accepted at MCAS, Cherry Point should be handled in accordance with paragraphs 3d and 3e above.

H. A. ZANDER
By Direction

LIST OF HAZARDOUS MATERIALS TO BE DISPOSED OF AT THE CHERRY POINT INDUSTRIAL WASTE TREATMENT PLANT FOR MAG-26 AND MAG-29
MCAS(H), NEW RIVER, JACKSONVILLE, NORTH CAROLINA

NOMENCLATURE	QTY	CATEGORY	NOT ACCEPTABLE	LACK OF INFO MAY REQUIRE CHEMICAL ANALYSIS	ACCEPTABLE	COMMENTS
10. Cleaning Compound Solvent	55 gal	Detergent		X		Heavy Metals Phenols Limitation
11. Ammonium Hydroxide Technical	58 gal	Base			X	No Limit
12. Corrosion Preventative Compound (Petroleum Base)	80 gal	N/A		X		Lack of Info to catagorize
13. Sulfuric Acid Electrolyte	65 gal	Acid			X	No Limit
14. Trichlorethane	10 gal	Solvent	X			
15. Corrosion Preventative (Aircraft Engine)	5 gal	N/A		X		Lack of Info to catagorize
16. Unknown Substance	80 gal	N/A		X		Lack of Info to catagorize
17. Ammonia based paint stripper	100 gal	Ammonia base stripper		X		Heavy Metals Limitation
18. Mixture of: ammonia base stripper lacquer paint lacquer thinner enamel paint enamel thinner	320 gal	N/A	X			Paints and Thinners unacceptable

LIST OF HAZARDOUS MATERIALS TO BE DISPOSED OF AT THE CHERRY POINT INDUSTRIAL WASTE TREATMENT PLANT FOR MAG-26 AND MAG-29
MCAS(H), NEW RIVER, JACKSONVILLE, NORTH CAROLINA

NOMENCLATURE	QTY	CATEGORY	NOT ACCEPTABLE	LACK OF INFO MAY REQUIRE CHEMICAL ANALYSIS	ACCEPTABLE	COMMENTS
1. Cleaning Compound	220 gal	Detergent		X		Heavy Metals Phenols Limitation
2. Dry Cleaning Solvent (Petroleum Naphtha)	25 gal	Solvent	X			
3. Cleaning Compound Aircraft Service	16 gal	Detergent		X		Heavy Metals Phenols Limitation
4. Engine Lube Oil	55 gal	Oil	X			Oil Limitation of 5 gal/day
5. " " "	220 gal	Oil	X			Oil Limitation of 5 gal/day
6. " " "	55 gal	Oil	X			Oil Limitation of 5 gal/day
7. Toulene Technical	110 gal	Solvent	X			
8. Methyl Ketone	55 gal	Solvent	X			
9. Paint Remover	55 gal	Possible Phenol		X		Unacceptable if solvent base; acceptable if chromium non-phenol base

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

MEMORANDUM

From: Director, Operations Divsion,

To: Director, NREA Division

Subj: PCB Transformer Mgmt. Plan

1. Julian –

See Col. B's note. Please brief me on this at your convenience.

thx

Rich

LANT DIV NOT COMING

Send to Operations they should be involved on this! Dailey

For info only BMO — ABMO OER T-file # 6240

17 Jan 80

Director, Natural Resources and Environmental Affairs Division

Director, Maintenance and Repair Division

PCB Transformer Management Plan and related PCB Concerns

Ref: (a) FoneCon btwn Mr. Cunanan, LantDiv, and Mr. J. Wooten, BMaintDept, on 4 Dec 79
(b) Engineering Service Request U9009 of Oct 78

Encl: (1) Cmdr NavFacEngCom ltr 114:PPC 6280 of 7 Dec 79
(2) Guide for the Management of Askarel (PCB) Transformers prepared by Versar Inc.

1. As a result of references (a) and (b), Lant/NavFacEngCom has forwarded enclosures (1) and (2) for use by Marine Corps Base, Camp Lejeune in dealing with PCB related transformer problems.

2. A review of enclosure (2) raises the following questions and potential concerns:

a. Are record-keeping requirements on page 93 applicable to MCB?

b. Has MCB identified those transformers containing PCB (Askarel)? See pages 1-4

c. Are MCB safety procedures addressing potential health hazards as discussed on pages 5 and 6 being followed?

3. Reference (a) indicates that a visit to MCB will be made by Lant/NavFacEngCom personnel during January to initiate preparation of a PCB Transformer Management Plan for Marine Corps Base.

4. Point of contact is Mr. P. Cunanan (AUTOVON) 690-7313.

JULIAN I. WOOTEN

Copy to:
BMO (w/o encl)

Director, Natural Resources and Environmental Affairs Division

Director, Fisheries and Wildlife Division

Director, Parks and Recreation Division

Director, Historic Preservation Division

Director, Planning Division

Director, Water Resources Division

Director, Air Quality Division

Director, Solid Waste Division

Director, Water Quality Division

Director, Environmental Health Division

Director, Pesticides Division

Director, Underground Storage Tank Division

Director, Environmental Review Division

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Director, Environmental Protection and Safety Division

Director, Environmental Protection and Health

T-file #6240

MAIN/DDS/th
6240
MAR 1 2 1980

From: Commanding General
To: Commanding General, 2d Force Service Support Group (Rein)
Fleet Marine Force, Atlantic, Camp Lejeune, North Carolina 28542
(Attn: Safety Officer)

Subj: Lithium Battery Disposal; information regarding

Ref: (a) CG 2dFSSG ltr OPS8/PWM/kty 8000 of 25 Jan 1980

Encl: (1) COMNAVELEXSYSCOM Wash DC 271555Z Jan 79
(2) NAVSEA Instruction 9310.1 of 30 Mar 1979

1. As per reference (a), enclosures (1) and (2) provide the latest guidance obtainable for the handling of the subject batteries. While there are no approved sites aboard base or within North Carolina for final disposal, facilities are available elsewhere.

2. Before specific disposal instructions can be provided by this command, the following information is needed:

a. National Stock Number(s) of Batteries

b. Name of Manufacturer/Other Identification

c. Volumes Presently on Hand for Disposal

d. If this material is generated on a constant basis, indicate amount.

Please forward requested information to the Commanding General, Marine Corps Base, (Attention: Base Maintenance Officer).

3. Until otherwise advised, it is recommended that the subject batteries be stored in strict adherence to the instructions contained in enclosures (1) and (2). It is recommended that the Base Safety Officer be contacted for assistance with labeling and other safety requirements associated with transporting and storage of this hazardous material aboard base.

4. If additional information is desired, please contact Mr. Danny Sharpe, Natural Resources and Environmental Affairs Division, Base Maintenance Department, extension 2083.

T. R. BAISLEY
By direction

Copy to:
BSafetyO

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU
U UNCLASSIFIED U
UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

ROUTINE

R 122333Z DEC 79

FM COMNAVELEXSYSCOM WASHINGTON DC

TO PWC NORFOLK VA
COMNAVFACENGCOM ALEXANDRIA VA
PWC SAN DIEGO CA

R 271855Z JUN 79

FM COMNAVELEXSYSCOM WASHINGTON DC

TO COMNAVSUPSYSCOM WASHINGTON DC

INFO NAVELEXSYSENGACT ST INIGOES MD
COMNAVSEASYSCOM WASHINGTON DC
NAVSAFECEN NORFOLK VA
NAVSWC SILVER SPRING MD

UNCLAS //N05100//

DISPOSAL OF LITHIUM BATTERIES

A. NAVSEAINST 9310.1 OF 30 MAR 79

1. LITHIUM SULFUR DIOXIDE BATTERIES ARE USED IN EQUIPMENT THROUGHOUT THE NAVY. THESE BATTERIES CONTAIN POTENTIALLY TOXIC, FLAMMABLE MATERIALS UNDER HIGH PRESSURE AND MUST BE DISPOSED AS HAZARDOUS WASTE.

2. NAVELEX HAS INSTITUTED A LITHIUM BATTERY REPLACEMENT FOR THE AN/PRC-94 WHEREIN A NEWER LITHIUM BATTERY REPLACES THOSE PRESENTLY IN THE FLEET. IT IS EXPECTED THAT THIS WILL REQUIRE THE IMMEDIATE DISPOSAL OF APPROXIMATELY 4,000 LITHIUM CELLS WORLDWIDE. WITHIN THE NEXT FEW YEARS OTHER SYSTEMS IN THE NAVY WILL REQUIRE THE DISPOSAL OF THOUSANDS OF LITHIUM BATTERIES.

3. INITIAL INQUIRIES BY NAVSAFECEN INDICATE THAT THE NAVAL SUPPLY CENTERS ARE NOT PREPARED TO ACCEPT THESE LITHIUM BATTERIES FOR DISPOSAL.

4. FOR INSTANCES WHEREIN LITHIUM BATTERIES HAVE NOT BEEN DISPOSED AT SEA IN ACCORDANCE WITH REFERENCE (A), IT IS REQUESTED THAT NAVSUP PROVIDE GUIDANCE BY MESSAGE THAT WILL ALLOW IMMEDIATE WORLDWIDE

DLVR:PWC NORFOLK VA(4)...ACT

RTD:000-000/COPIES:0004

UUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUUU

ENCLOSURE (1)

PHYSICAL TURN IN OF LITHIUM BATTERIES AS HAZARDOUS WASTE. THEY SHOULD BE EITHER DISPOSED IN A HAZARDOUS WASTE LANDFILL OR RENDERED HARMLESS BY AN APPROVED CHEMICAL MEANS UNDER THE SUPERVISION OF KNOWLEDGEABLE CHEMISTS AND THEN DISPOSED IN A SANITARY LANDFILL. DETAILS SUFFICIENT FOR RENDERING A JUDGMENT AS TO THE SAFETY OF THE CHEMICAL INERTING PROCESS MUST BE FORWARDED TO NAVSEA (SEA 04H) FOR APPROVAL.

5. WHILE AWAITING DISPOSAL, LITHIUM BATTERIES OR CELLS MUST BE INDIVIDUALLY SEALED IN A PLASTIC BAG OR INDIVIDUALLY WRAPPED IN ELECTRICAL INSULATING MATERIAL AND BE STORED IN DOT APPROVED SHIPPING CONTAINERS.

6. DOT APPROVED SHIPPING CONTAINERS ARE AS DESCRIBED BELOW. PACK THE WRAPPED CELLS IN STRONG INNER FIBERBOARD CONTAINERS. PACK NO MORE THAN ONE BATTERY PER INNER BOX. BATTERIES MUST BE IN A HEAT SEALED OR ZIP-LOC PLASTIC BAG BEFORE BEING PACKED IN THE INNER FIBERBOARD BOX. PACK THE INNER CONTAINERS IN ONE OF THE FOLLOWING TYPE OUTSIDE CONTAINERS (1) STRONG WOODEN BOX (2) DOT SPECIFICATION 12B FIBERBOARD BOX (OR EQUIVALENT), (3) DOT SPECIFICATION 21C FIBER DRUM OR EQUIVALENT OR (4) REMOVABLE HEAD DRUM OF THE DOT SPECIFICATION 17H OR 17C SERIES (OR EQUIVALENT), AND BE EQUIPPED WITH A GAS TIGHT GASKET.

WHEN METAL DRUMS ARE USED, THE INNER CONTAINERS MUST BE SEPARATED FROM EACH OTHER AND ALL INNER SURFACES OF THE DRUM BY AT LEAST ONE INCH THICKNESS OF VERMICULITE OR OTHER EQUIVALENT NON-COMBUSTIBLE CUSHIONING MATERIALS FOR THE CELLS AND TWO INCH THICKNESS FOR THE BATTERIES.

CELLS CONTAINING LESS THAN 5 GRAMS OF METALLIC LITHIUM (D SIZE AND SMALLER) ARE LIMITED TO 500 GRAMS PER CONTAINER. CELLS CONTAINING MORE THAN 5 GRAMS OF LITHIUM (LARGER THAN D SIZE) ARE LIMITED TO A MAXIMUM OF 25 IN ONE CONTAINER. SHIPMENT BY AIR CARGO-ONLY IS ALLOWED ONLY FOR THE METAL DRUM WITH GAS TIGHT SEAL DESCRIBED ABOVE. ALL SHIPMENT USING THE OTHER CONTAINERS DESCRIBED ABOVE SHALL BE BY WATER, MOTOR VEHICLE OR RAIL FREIGHT. FOR TRANSPORT, OUTER PACKAGES MUST BE MARKED AND LABELLED AS PRESCRIBED IN SUBPART "D" AND "E" OF 49CFR. FOR EXAMPLE, DOT "FLAMMABLE SOLID" MARKING AND THE WORDS "CONTAINS LITHIUM METAL."

7. IN ACCORDANCE WITH REFERENCE (A), USED LITHIUM BATTERIES ARE NOT TO BE ALLOWED TO ACCUMULATE AND DISPOSAL SHOULD BE EFFECTED PROMPTLY. A COLLECTION POINT AND STORAGE AREA SEPARATE FROM OTHER COMBUSTIBLE MATERIAL SHALL BE ESTABLISHED FOR BATTERIES AWAITING DISPOSAL. LITHIUM BATTERIES ARE NOT TO BE DISPOSED OF NOR TRANSPORTED WITH NORMALLY GENERATED REFUSE.

WHETHER FRESH OR DISCHARGED, LITHIUM BATTERIES SHALL NOT BE PIERCED, CRUSHED, BURNED, INTENTIONALLY DROPPED, CANNIBALIZED, DISMANTLED, MODIFIED, OR OTHERWISE CARELESSLY HANDLED, NOR SHALL THEY BE SHORT CIRCUITED, CHARGED OR USED IN ANY WAY OTHER THAN THEIR INTENDED USE.

8. STORAGE REQUIREMENTS FOR BOTH NEW AND USED LITHIUM BATTERIES ARE AS FOLLOWS:

ALTHOUGH LITHIUM BATTERIES HAVE BEEN CLASSIFIED AS FLAMMABLE SOLIDS BY THE DEPARTMENT OF TRANSPORTATION, THE POTENTIAL FOR A FIRE TO START IN THE PACKAGED ITEM IS CONSIDERED THE SAME AS FOR ORDINARY COMUSTIBLE MATERIALS. HOWEVER, IF INVOLVED IN A FIRE, THE CLASSIFICATION FOR EXTINGUISHMENT PURPOSES WOULD BE "EXTRA HAZARD." GUIDELINES FOR STORAGE OF THE LITHIUM BATTERIES INSIDE OF BUILDINGS ARE AS FOLLOWS:

A. SPECIAL CARE SHOULD BE EXERCISED IN HANDLING AND MOVING CONTAINERS TO PREVENT CRUSHING OR PUNCTURING OF THE STEEL SHELL.

B. THE STORAGE AREA SHOULD HAVE ADEQUATE VENTILATION TO PREVENT BUILD-UP OF FUMES FROM ANY LEAKING BATTERIES. STORAGE TEMPERATURES ABOVE 130 DEGREES FAHRENHEIT SHOULD BE AVOIDED.

C. STORAGE SHALL BE IN A SPRINKLER-PROTECTED FACILITY, IF AVAILABLE. A NONCOMBUSTIBLE BUILDING OR STRUCTURE WITHOUT SPRINKLERS WILL BE THE SECOND CHOICE. A COMBUSTIBLE STORAGE FACILITY MAY BE USED TEMPORARILY IF NEITHER OF THE ABOVE TYPES ARE AVAILABLE AT THE TIME STORAGE IS REQUIRED. HOWEVER, OTHER MORE HAZARDOUS COMMODITIES SHALL NOT BE STORED IN THE SAME FIRE AREA AS THE BATTERIES WHEN THE AREA IS NOT SPRINKLER PROTECTED.

D. IN ANY FACILITY, PILES OR STACKS SHALL BE LIMITED TO 2,000 SQ. FT. IN AREA WITH THE WIDTH OF THE STORAGE UNIT NOT MORE THAN 25 FT. AISLES BETWEEN STACKS SHALL BE 8 FT. OR ONE-HALF THE STACK HEIGHT, WHICHEVER IS GREATER. A MINIMUM OF 2-FT. CLEARANCE SHALL BE MAINTAINED BETWEEN STACKS AND ANY WALL. A 3-FT. CLEARANCE SHALL BE MAINTAINED BETWEEN A STACK AND ANY FIRE DOOR OPENING. A VERTICAL CLEARANCE OF 3 FT. SHALL BE MAINTAINED BETWEEN THE TOP OF STACKS AND SPRINKLER HEADS. IN UNSPRINKLERED FACILITIES, 3 FT. OF CLEARANCE SHALL BE MAINTAINED BETWEEN TOPS OF STACKS AND CEILING OR ROOF CONSTRUCTION.

E. NO OTHER MATERIAL OR COMMODITY WILL BE STORED IN THE SAME STACK WITH THE BATTERIES.

F. SMOKING SHALL BE STRICTLY PROHIBITED IN BATTERY STORAGE AREAS EXCEPT IN LOCATIONS PROMINENTLY DESIGNATED AS SMOKING AREAS. "NO SMOKING" SIGNS SHALL BE POSTED IN PROHIBITED AREAS. THE USE OF OPEN FLAME DEVICES SHALL BE RESTRICTED TO OPERATIONS UNDER PROPER SUPERVISION AND WITH ADEQUATE FIRE PREVENTIVE SAFEGUARDS.

9. NAVSEA (04H) CONCURS.

BT

ENCLOSURE ( )

DEPARTMENT OF THE NAVY
NAVAL SEA SYSTEMS COMMAND
WASHINGTON, D.C. 20362

IN REPLY REFER TO

NAVSEAINST 9310.1
SEA 04H3/EAD
Ser 109
30 March 1979

NAVSEA INSTRUCTION 9310.1

From: Commander, Naval Sea Systems Command
To: All Offices Reporting Directly to COMNAVSEA
Commander, Naval Ship Engineering Center
Distribution List

Subj: Lithium Batteries; responsibilities, policies and guidelines for

Encl: (1) Guidelines for Design, Acquisition, Packaging, Use, Transport, and Disposal of Lithium Batteries

1. Purpose. To promulgate policies and guidelines for the design, acquisition, use, packaging, transportation and disposal of lithium batteries.

2. Scope. This instruction is applicable to all Navy activities and to Marine Corps activities to the extent specified by the Commandant.

3. Background

a. During the past decade battery manufacturers in the United States and certain foreign nations have developed electrochemical cells using lithium metal anodes coupled with either thionyl chloride, sulfur dioxide, carbon monofluoride or other cathode materials. These cells present a major breakthrough as a primary power source and provide certain unique advantages over conventional cells. Some of these advantages are: a) a substantial improvement in gravimetric energy density (200 watt-hours per pound have been demonstrated), b) high operating voltage (2.9 to 3.6 volts per cell), c) low temperature operation (40-60% of the capacity at 70°F is still deliverable at -40°F), d) long shelf life (useful performance after 5-10 years of normal storage).

b. The different electrochemistries and hardware designs used in the various cells result in different performance and safety characteristics. Lithium cells have a high internal resistance which may limit use to low rate applications. Potential hazards may exist due to misuse of cells or the use of cells of poor design

ENCLOSURE (2)

and quality. In this vein, there have been accidents resulting in venting of toxic gases, explosions and fires. Some of these accidents have damaged equipment and inflicted injuries to personnel, one of which was fatal. To date no accidents have occurred in systems with two or less cells. Each Systems Command or Project Manager is responsible for assuring safety in design and obtaining safety approval for lithium batteries under its development or acquisition cognizance, in accordance with the procedure stipulated in enclosure (1).

c. Lithium battery systems are relatively new, and experience in design, use, and disposal is quite limited as compared to other primary battery systems. The highly energetic nature of lithium batteries requires that safeguards be employed in design, procurement, use, storage, packaging, transportation, and disposal. In general, manufacturers are aware that under certain conditions the lithium anode cells may be unsafe and most have incorporated safety devices into units such as: a) pressure relief mechanisms, b) fuses to protect against overload in units containing multiple cells, some of which are connected in parallel and, c) diodes to prevent cell reversal. The efficiency of these safety devices in many cases is dependent on the environment in which the battery is used, as well as the mode of operation.

4. Policy. The number of safety incidents dictates that caution be exercised in all areas concerned with the handling of lithium batteries. Due to the hazard potential in use and the technological and ecological aspects in disposal, lithium batteries shall only be used when it is established that no other battery will provide adequate performance in the item of use. Only lithium batteries which have been approved as safe for a specific application shall be procured for use and then solely for that application.

5. Responsibilities

a. The Commander, Naval Sea Systems Command, as the designated technical authority for lithium battery safety within the Naval Material Command, per CHNAVMAT Ltr 04F4/HAM of 12 Sept. 1977, will serve as the single point of contact and act authoritatively for the Naval Material Command regarding such matters. Questions related to redesign, use, packaging, storage, transportation and disposal of these batteries are to be addressed to the Commander, Naval Sea Systems Command (SEA 04H), Washington, D.C. 20362.

b. Each Systems Command or Project Manager is responsible for assuring the safety and the granting of safety approval for lithium batteries, for which it has development or acquisition cognizance, in accordance with the procedure stipulated in enclosure (1).

S. G. CATOLA
Deputy Commander for
Fleet Support

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A4A	CHNAVMAT (MAT 0415, 042, 046)
A5	BUMED (8)
A6	CMC (10)
B2A	DDESB
B5	COMDT COGARD
B2D	DCASR
C4J	FMAG PEARL DET
FF5	NAVSAFECEN
FF8	PRESINSURV
FKM22	NAVPUBFORMCEN (500)
FKM27	NPPSMO (SUP 10/CL)
FKP3A	NAVPRO
FKP7	NAVSHIPYD (Phila Code 1100)
FT63	CNET SUPPORT
FT64	NAVTRAEQUIPCEN
FT88	EDOSCOL

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FMAG SFRAN DET
NAVSEC FIELD DIVISION

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NAVSEAINST 9310.1
30 March 1979

GUIDELINES FOR DESIGN, ACQUISITION
USE, PACKAGING, TRANSPORT AND DISPOSAL OF LITHIUM BATTERIES

1. Only lithium batteries which have been approved as safe shall be acquired for use. The Systems Command having cognizance of the development or acquisition is responsible for issuing such approval. A technical evaluation of the battery and its intended use shall be the basis for approval decisions. The Naval Surface Weapons Center, White Oak, Maryland (Electrochemistry Branch WR-33) should be utilized for this technical evaluation. Programs anticipating the use of lithium batteries shall submit to the NAVSURFWPNCEN via the Commander, Naval Sea Systems (SEA 04H) Washington, D.C. 20362 a data package validating the selection of the lithium battery by describing: (a) the proposed battery, e.g. design, geometry and electrochemical system, (b) the equipment design, current drain, types of safety features, fuses (include valves), battery use, venting and strength, (c) the logistic and operational use sequency of the item in which the battery is to be used. Upon completion of the technical review, a recommendation concerning the safety of the proposed battery will be presented to the cognizant command by COMNAVSEASYSCOM. In cases warranting such action, the Weapon System Explosives Safety Review Board shall be convened to review the technical evaluation and make recommendations concerning the safety of the item in which the battery is to be used.

2. All lithium batteries shall be marked to indicate the information required by Figure 1. In addition to this information, the unit packages shall be marked with the Hazardous Material Marking Symbol of NAVSUP Publications 4500 (Consolidated Hazardous Item List).

3. Manufacturers shall be required to provide Material Safety Data Sheets in accordance with ASPR. 7-104.98.

4. All unit cells shall be constructed so that the cell case to cover seal is a continuous weld, free from holes and other imperfections. The seal between the positive electrode and the cover shall be of the glass or ceramic to metal type and free from imperfections. Each cell, battery and battery enclosure must incorporate a safety venting device or be designed and manufactured in such a manner that will preclude a violent rupture condition, such as dead short or involvement in a fire, incident to transportation, use, storage or disposal. Nothing shall be done in the design and construction of the battery that will degrade the vent.

Enclosure (1)

5. Each cell used as the power source, or each group of cells connected in series, shall contain a fuse or other suitable over-current device that will open if that group of cells is discharged at an excessive rate. When possible, heat and pressure sensing devices shall be employed which activate an electrical bypass of a defective cell.

6. To prevent shorts, internally and externally, all metal parts shall be secured to prevent any movement at any time during a battery lifetime. Electrode separators shall be compatible with the other materials of construction.

7. Whenever possible, lithium batteries shall be constructed with cells of a size that are not interchangeable with commercial flashlight and radio batteries.

8. Whenever possible in development programs, completely assembled batteries should be procured from a battery manufacturer. Assembly of batteries by inexperienced personnel should be avoided.

9. Basic packaging, marking and shipping requirements imposed by the Department of Transportation are contained in Attachment A. In addition to the minimum requirements of Attachment A, Navy activities desiring to use lithium batteries shall:

a. Ensure that a complete design disclosure is obtained on the packaging of the specific battery, preferably prior to any shipment, but in any case, no later than release for limited production or full scale production whichever occurs first.

b. Ensure that the design disclosure is incorporated in the appropriate acquisition specification, contract and manuals. Descriptive specification language shall be supplemented by DOD-D-1000 Drawings or figures in the specification as appropriate.

c. Ensure that the efficiency of the packaging is demonstrated by tests and obtain a test report. The minimum package performance level is contained in MIL-STD-648. Other tests required by Attachment A shall also be performed.

d. Ensure that where batteries are entered in the supply system for organizational or intermediate maintenance level replacement, batteries so acquired are packaged so as to be capable of shipment by "cargo only" aircraft.

e. Advise potential suppliers not listed in the latest issue of Attachment A that they must become a party thereto prior to shipping batteries by any mode.

10. Activities procuring batteries for limited or full scale production shall ensure that configuration management is imposed on the battery and its packaging by use of MIL-STD-480. In addition to the usual definition, a Class 1 change shall be defined as any change affecting safety characteristics of the battery as described herein. Class 1 battery changes shall be coordinated with NSWC. Class 1 packaging changes shall be reviewed by personnel formally qualified in hazardous material packaging.

11. Storage of Lithium batteries shall be as follows:

a. Lithium cells and batteries shall be stored in their original shipping containers in a cool, ventilated shelter.

b. The storage area shall be isolated from other hazardous and combustible material and used only for the storage of unused lithium batteries.

c. Since the effect of mass storage on the hazard degree is not known, the quantity stored in an area shall be kept to the minimum consistent with requirements.

d. Batteries in storage shall be retained in unit packages, preferably shipping containers, to prevent heat transfer between batteries.

12. Rough handling of lithium batteries may increase the hazards in use. Therefore, qualification testing for a specific application should include environmental testing representative of the actual environments to be encountered in the logistic cycle for that application.

13. In the event of an accident, incident or malfunction, either with or without visible damage to the battery, notify the appropriate authorities in accordance with the reporting procedures of Chapter 7 of OPNAVINST 5102.1, "Accident Investigation and Reporting". Report Symbol OPNAV 5102-2 is assigned the Material (property) Damage Report.

14. Since most of the documented safety incidents have occurred with a partially or fully discharged lithium battery, such should be removed from its associated equipment upon completion of its useful life. The exposed terminal should be insulated to prevent short circuits, and the battery is to be turned into an appropriate disposal agency. When possible, agencies licensed to dispose of hazardous material should be utilized. If this is not possible then dispose as follows:

a. At sea, discharge overboard in deep water (in excess of 500 feet) outside the prohibited zone (50 mile limit). Do not store for shore disposal.

b. Ashore batteries should be buried in a controlled hazardous waste landfill. Disposal directions may be obtained from the Navy Environmental Support Office, (NESO 20.2-011 Hazardous Waste Disposal Guide), and the DOD Disposal Manual DOD 4160.21M.

15. Used lithium batteries are not to be allowed to accumulate and disposal should be effected promptly. A collection point and storage area separate from other combustible material shall be established for batteries awaiting disposal. Lithium batteries are not to be disposed of nor transported with normally generated refuse.

16. Whether fresh or discharged, lithium batteries shall not be pierced, crushed, burned, intentionally dropped, cannibalized, dismantled, modified, or otherwise carelessly handled, nor shall they be short circuited, charged or used in any way other than their intended use.

17. An extinguisher suitable for metal fires (class D fires), e.g. MET-L-X or LITH-X, should be used to extinguish burning lithium. When such a dry powder type fire extinguisher is used, some of the extinguishing agent may spread throughout a wide area around the point of use. Therefore, if at all possible, remove items such as electronic instruments which could be contaminated by the powder particles (sodium chloride base with MET-L-X and graphite base with LITH-X) from any area where a dry powder type extinguisher might be used. This guidance is primarily for battery assembly facilities, since the design and size of currently contemplated lithium batteries for fleet use will preclude the occurrence of lithium metal fires.

18. When entering a storage space in which lithium batteries have vented gases, supplied air respirators or self-contained breathing apparatus approved by the National Institute for Operational Safety and Health (NIOSH) shall be worn.

Enclosure (1)

DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
WASHINGTON, D.C. 20590

DOT-E 7052
(Fourth Revision)

1. Power Conversion, Incorporated, Mount Vernon, New York, is hereby granted an exemption from those provisions of this Department's Hazardous Materials Regulations specified in paragraph 5 below to offer packages prescribed herein of a certain flammable solid for transportation in commerce subject to the limitations and special requirements specified herein. This exemption authorizes the shipment of batteries containing lithium and other material and provides no relief from any regulation other than as specifically stated. Each of the following is hereby granted the status of a party to this exemption:

Honeywell Incorporated, Horsham, Pennsylvania - PTE-1
Mallory Battery Company, Tarrytown, New York - PTE-2
Eagle-Picher Industries, Inc., Joplin, Missouri - PTE-3
Electrochimica Corporation, Mountain View, California - PTE-4
Tadiran-Israel Electronics Industries LTD., Tel Aviv, Israel - PTE-5
GTE Sylvania, Incorporated, Seneca Falls, New York - PTE-6
National Semiconductor Corporation, Santa Clara, California - PTE-7.
GTE Laboratories, Waltham, Massachusetts - PTE-8.
U.S. Department of Defense, Washington, D.C. - PTE-9.
Ray-O-Vac Division, ESB Inc., Madison, Wisconsin - PTE-10.
Department of Energy, Washington, D.C. (including its contractor Sandia Laboratories, Albuquerque, New Mexico) - PTE-11.
Beech Aircraft Corporation, Wichita, Kansas - PTE-12.
Altus Corporation, Palo Alto, California - PTE-13.

2. BASIS. This exemption is based on Power Conversion's application dated November 10, 1977, submitted in accordance with 49 CFR 107.103 and Department of the Army's application dated January 10, 1978, submitted in accordance with 49 CFR 107.103. The granting of party status is based on the following applications submitted in accordance with 49 CFR 107.111 and the public proceeding thereon:

Honeywell Inc.'s application dated September 30, 1976.
Mallory Battery Company's application dated July 23, 1976.
Eagle-Picher Industries, Inc.'s application dated September 28, November 4, and November 12, 1976.
Electrochimica Corporation's application dated October 14, 1976.
Tadiran-Israel Electronics Industries LTD.'s application dated November 22, 1976.
GTE Sylvania, Incorporated, application dated December 12, 1977.
National Semiconductor Corporation's, application dated November 29, 1977.
GTE Laboratories' application dated January 3, 1977.
Ray-O-Vac Division's application dated March 23, 1978.
Department of Energy's application dated March 14, 1978.
Beech Aircraft Corporation's application dated March 31, 1978.
Altus Corporation's application dated February 6, 1978.

3. HAZARDOUS MATERIALS (Descriptor and class). Lithium batteries containing metallic lithium, vanadium pentoxide, monofluorographite, sulfur dioxide, lithium bromide salts, acetonitrile, or mixtures of acetonitrile and propylene carbonate; also lithium batteries containing lithium metal, a depolarizer such as thionyl chloride or sulphuryl chloride and a lithium salt such as lithium tetrachloroaluminate or lithium perchlorate - classed as flammable solid.

4. PROPER SHIPPING NAME (49 CFR 172.101). Lithium metal, in cartridges.

5. REGULATION AFFECTED. 49 CFR 173.206(e)(1), 175.3.

6. MODES OF TRANSPORTATION AUTHORIZED. Motor vehicle, rail freight, cargo vessel and cargo-only aircraft.

7. SAFETY CONTROL MEASURES. Packaging prescribed is as follows:

a. Cells and batteries must be packed in strong inner fiberboard containers. Cells containing not more than 5 grams of metallic lithium are limited to a maximum of 500 grams of lithium in one inner container. Cells containing more than 5 grams of metallic lithium are limited to a maximum of 25 in one inner container.

b. Batteries must be enclosed in a heatsealed plastic bag before being packed in the inner fiberboard box. Only one battery is authorized in each inner box.

c. When drums are used, the inner containers must be separated from each other and all inner surfaces of the drum by at least one inch thickness of vermiculite or other equivalent noncombustible cushioning materials for the cells and two inch thickness for the batteries.

d. Inside boxes must be further overpacked as specified in paragraphs (8c) or (8d).

e. Maximum gross weight of one outside box must not exceed 75 pounds.

f. Packages must be marked and labeled as prescribed in subpart "D" and "E" of 49 CFR.

g. Each cell and battery must be equipped with an effective means of preventing external short circuits.

h. Each cell and battery must incorporate a safety venting device or be designed in such a manner that will preclude a violent rupture under any condition incident to transportation such as a "dead short" or involvment in a fire. The design of cells and batteries not equipped with a safety venting device must be specifically identified to this office prior to the first shipment of package.

i. Three representative cells must be taken from each week's production of each cell type and be subjected to the test prescribed in section 3.2.1(1) of Appendix B, Report ECOM730242F on file with the Office of Hazardous Materials Regulation (OHMR).

j. One representative battery must be taken from each week's production of each battery type and must be subject to the test prescribed in Section 3.3.2(1) of the above referenced report.

k. At least 10 cells and one battery of each type of each week's production must be subjected to a thermal stability test at 75°C., for 48 hours and show no evidence of distortion, leakage or internal heating.

8. SPECIAL PROVISIONS.

a. Persons who receive packages covered by this exemption may reship them pursuant to the provisions of 49 CFR 173.22a.

b. A copy of this exemption must be carried aboard each vessel and aircraft used to transport packages covered by this exemption.

c. For shipment by cargo-only aircraft, the outside container must be a removable head drum of the DOT Specification 17H or 17C series (or equivalent) and be equipped with a gastight gasket.

d. For shipment by water, motor vehicle, rail freight, the outside container must be either (1) strong wooden box, (2) DOT Specification 12B fiberboard box (or equivalent), (3) DOT Specification 21C fiber drum, or equivalent, or (4) metal drum as authorized in paragraph (c) above.

e. Cells not exceeding 2.4" in length and 1.35" in diameter composed essentially of lithium metal, acetonitrile and sulfur dioxide, and which are hermetically sealed, and batteries constructed of such cells, are excepted from the requirements of 7.i., 7.j., 7.k. and 8.c., of this exemption when in compliance with the following:

Prior to the first shipment, 10 cells or 4 batteries of each type to be offered for transportation must be tested as follows, without showing any evidence of out-gassing, leakage, loss of weight, or distortion:

1. The cells or batteries shall be stored for 6 hours at a pressure corresponding to an altitude of 50,000 feet at 24°C $\pm$ 4°C.

ii. The cells or batteries shall then be subjected to the thermal stability test at 75°C for 48 hours as required in paragraph 7.k.

iii. Finally, the cells or batteries shall be rigidly clamped to the platform of a vibration machine. A simple harmonic motion having an amplitude of 0.03 inch (0.06 inch maximum total excursion) shall be applied. The frequency shall be varied at the rate of 1 cycle per second per minute between the limits of 10 and 55 cycles per second. The entire range of frequencies and return shall be traversed in 95 ±5 minutes for each of three mutually perpendicular mounting positions of the battery and two perpendicular positions of the cells. One of the directions of vibration shall be perpendicular to the terminal face of the battery or cell. Open circuit voltage shall be observed for 30 seconds during the last quarter of each vibration period. Periodic retesting is not required. Cells and batteries meeting the requirements of the paragraph must be packaged in accordance with 7.a., 7.b., and 8.d. of this exemption.

9. REPORTING REQUIREMENTS.

a. Any incident involving loss of contents of the package must be reported to the OHMR as soon as practicable.

b. Application for renewal of this exemption must include test data obtained under 7.i. j., and 8.e. This data must also be made available upon request by the OHMR.

10. EXPIRATION DATE. May 15, 1980, for Power Conversion Incorporated, and PTE-1, PTE-2, PTE-3, PTE-6, PTE-9, PTE-10, PTE-11, PTE-12, and PTE-13; June 30, 1978, for PTE-4, PTE-5, PTE-7, and PTE-8.

Issued at Washington, D. C.

MAY 2 5 1978

Alan I. Roberts
Associate Director for
Office of Hazardous Materials Regulation

[DATE]

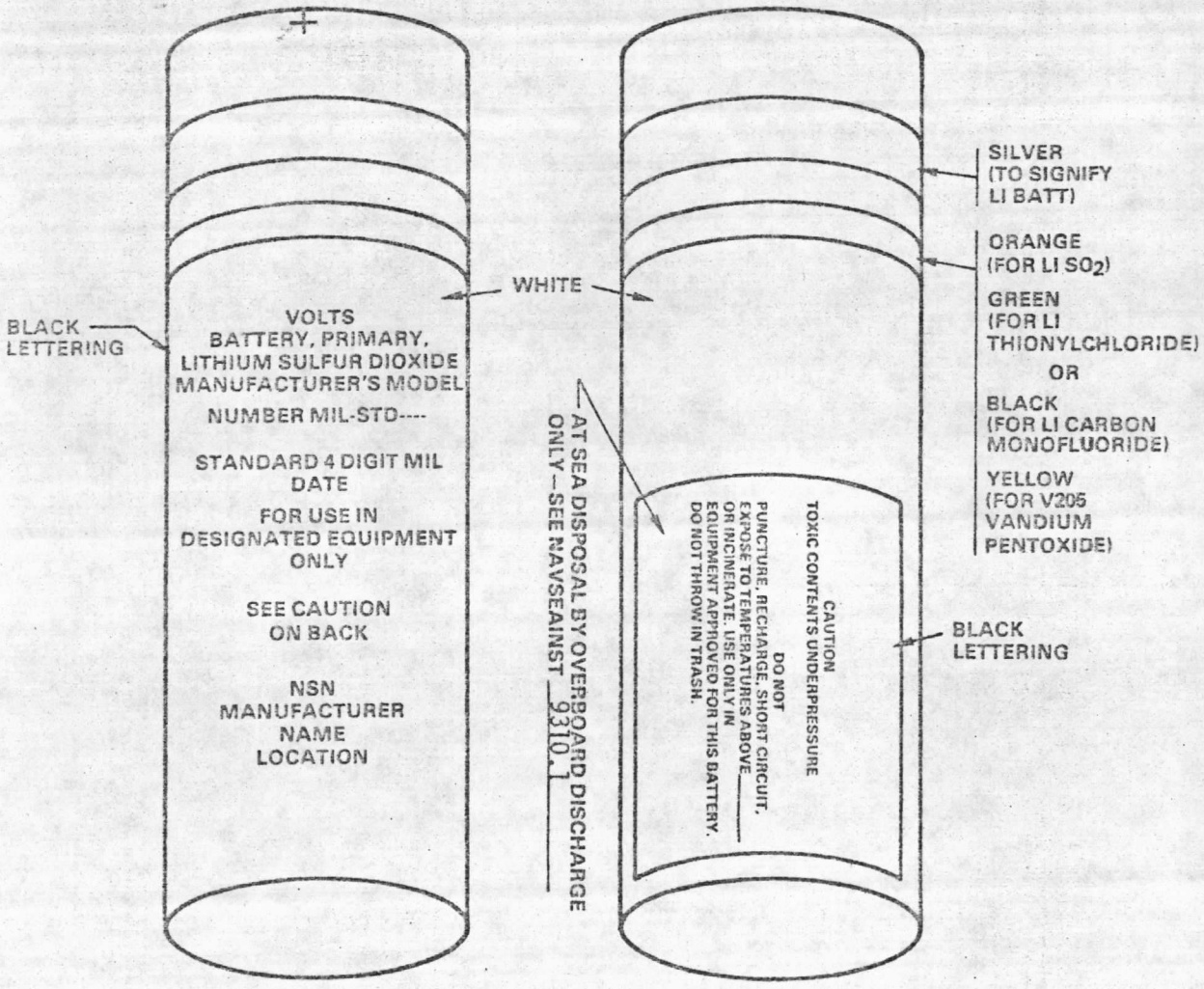


Fig. 1 BATTERY LABELING

	ACTION	INFO	INITIAL
	JAN 3 0 1980		
BMO		✓	
ABMO		✓	BJR
MAINT NCO			
SAFETY CHMN			
PROP			
M&R			
OPNS			
ADMIN		✓	S
TELE			
UTIL			
ENVIRON AFF	✓		
SECRETARY			
F&A BRANCH			
UMACS			

This may be for Supply Services

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 1-29-80

TO:

[BASE MAINT O] DIR, QUARTERS & HOUSING

PUBLIC WORKS O DIR, BOQ/BSQ

COMM-ELECT O BASE FIRE CHIEF

MOTOR TRANSPORT O

ATTN: _____

(1) Attached is forwarded for ~~info~~/action.

Please prepare a reply.

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

3. Your file copy.

K. P. Mullen J

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

T-file # 6240

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

IN REPLY REFER TO

OPSB/PWM/kty
8000
25 Jan 1980

From: Commanding General
To: Commanding General, Marine Corps Base (Environmental Div)

Subj: Lithium Batteries Disposal Procedure; request for information concerning

Ref: (a) NAVEODFAC, Indian Head MD msg 091932Z Jan 80

1. It is requested that identification of disposal procedures for lithium batteries be provided to this headquarters, (Attn: Safety Officer, Ext. 3456). Reference (a) pertains.

P. W. Miller

P. W. MILLER
By direction

Ens Sgt ... use Lithium Batteries ... R/F

RTTUZYUW RUEBHNA0683 0091932-UUUU--RUEBDOB RUEBDOA.
ZNR UUUUU
R 291932Z JAN 80
FM NAVEODFAC INDIAN HEAD MD
TO AIG FOUR THREE FIVE
AIG NINE ZERO ZERO SEVEN
AIG NINE FOUR TWO SIX
BT
UNCLAS //N23027//
NAVY ADDRESSEES DELIVER DURING WORKING HOURS ONLY
PRECAUTIONS AND PROCEDURES FOR SAFE HANDLING,
STORAGE AND DISPOSAL OF LITHIUM BATTERIES.
1. THIS MSG HAS JOINT SERVICE CONCURRENCE.
2. RECENT INQUIRIES CONCERNING SPECIFIC PRECAUTIONS AND PROCEDURES NECESSARY FOR THE SAFE HANDLING, STORAGE, AND DISPOSAL OF LITHIUM BATTERIES HAS RESULTED IN THE NAVAL SURFACE WEAPONS CENTER, WHITE OAK, BEING TASKED BY NAVSEA TO DEVELOP A TECHNOLOGY BASE THAT WILL PERMIT SAFE USAGE OF LITHIUM BATTERIES BY THE NAVY. THE TASK HAS NOT YET BEEN COMPLETED; HOWEVER, THE FOLLOWING TENTATIVE SAFETY RECOMMENDATIONS FOR STORAGE, HANDLING AND DISPOSAL OF LITHIUM BATTERIES IS FORWARDED. THESERECOMMENDATIONS APPLY TO THE KIND OF LITHIUM

PAGE 02 RUEBHNA0683 UNCLAS
BATTERY CONTAINING SULFUR DIOXIDE CATHODES WHICH IS THE ONLY KIND PRESENTLY IN USE BY THE FLEET.
A. STORAGE RECOMMENDATIONS
(1) LITHIUM CELLS AND BATTERIES SHOULD BE STORED IN THEIR ORIGINAL SHIPPING CONTAINERS IN A COOL, WELL-VENTILATED SHELTER.
(2) THE STORAGE AREA SHOULD BE ISOLATED FROM OTHER HAZARDOUS AND COMBUSTIBLE MATERIAL. IT SHOULD BE USED ONLY FOR THE STORAGE OF UNUSED LITHIUM BATTERIES.
(3) ADEQUATE FIRE PROTECTION SHOULD BE PROVIDED, INCLUDING A LITH-X FIRE EXTINGUISHER.
(4) THE MAXIMUM NUMBER OF BATTERIES THAT CAN BE STORED SAFELY IS NOT KNOWN. THEREFORE, IT IS RECOMMENDED THAT THE QUANTITY BE KEPT TO A PRACTICAL MINIMUM.
(5) IN THE EVENT OF A MALFUNCTION WITHOUT VISIBLE DAMAGE TO THE BATTERY, IMMEDIATELY NOTIFY THE APPROPRIATE AUTHORITIES SO THAT A DECISION CAN BE MADE AS TO WHETHER A POST MORTEM EXAMINATION SHOULD BE PERFORMED.
3. DISPOSAL RECOMMENDATIONS
A. MOST OF THE DOCUMENTED SAFETY INCIDENTS HAVE OCCURED

09 19 32

PAGE 03 RUEBHNA2683 UNCLAS
WITH EITHER PARTIALLY OR COMPLETELY DISCHARGED LITHIUM BATTERIES. THEREFORE, A LITHIUM BATTERY SHOULD BE REMOVED FROM THE ASSOCIATED EQUIPMENT UPON COMPLETION OF ITS USEFUL LIFE, AND TURNED IN TO AN APPROPRIATE PLACE FOR PROMPT DISPOSAL. IF POSSIBLE, LITHIUM BATTERIES SHOULD BE DISPOSED OF BY AN AGENCY LICENSED TO DISPOSE OF HAZARDOUS MATERIALS. IF THIS IS NOT POSSIBLE, THEN DISPOSE OF EXPENDED BATTERIES BY EITHER B OR C BELOW.
B. ON LAND, BATTERIES SHOULD BE BURIED IN A CONTROLLED LANDFILL WHERE THE GROUND WILL NOT BE DISTURBED FOR SEVERAL YEARS.
C. AT SEA, THE BATTERIES SHOULD BE SUNK IN AN AREA AT LEAST 500 FEET DEEP WHERE ANY CHANCE OF RECOVERY IS REMOTE.
D. USED LITHIUM BATTERIES SHOULD NOT BE ALLOWED TO ACCUMULATE; THEY SHOULD BE DISPOSED OF PROMPTLY.
E. A COLLECTION POINT AND CONTROLLED TEMPORARY STORAGE AREA SHOULD BE PROVIDED FOR BATTERIES AWAITING DISPOSAL.
F. DO NOT DISPOSE OF LITHIUM BATTERIES BY THROWING THEM IN THE COMMON TRASH WHERE THERE IS A CHANCE OF THE BATTERIES BEING CRUSHED.
BT
#2683

WATCH: 2
CCN: 1143
CWO: 2AB
ACT
DIST

C/S	MANPWR	INTEL	PLANS	HUMAFR	READO	TRNG	COMPT	OPS	SJA	DISMO	ADJ	CED	PERSO	JPAO	ISMO	CHAP	POSTO	PUBCLK	CMF	A.O.U.	COMSUBN	ENGREN	MTEN	ANGLICO	RECONCO	EOD EN	MAINTBN	SUPBN	DENBN	FASC	NSDEN	CFAO	CIT	LFOSPTBN	MSSG-32	MSSG-24	MSSG-26	MSSG-36	MSSG-46	RSSG-4	RADBN

ASBESTOS

1. Definition. Asbestos is a general term used to describe several fibrous mineral silicates. "Asbestos Fibers" means asbestos fibers longer than 5 micrometers.

2. Types. There are many asbestos minerals. Of this number only six types are of commercial importance which are:

Chrysotile

Amosite

Crocidolite

Tremolite

Anthophyllite

Actinolite

3. Uses. Although asbestos is used in miscellaneous products, its major uses are:

Asbestos cement products

Floor tiles

Fireproofing

High temperature insulation

Asbestos cloth

Friction material (brake linings, clutch facings)

Various gasket materials.

4. Permissible Exposure Concentration

a. "Time Weighted Average" - The 8-hour airborne concentration of asbestos fibers to which military personnel or civilian employees may be exposed shall not exceed two (2) fibers, longer than 5 micrometers (5 millionths of a meter), per cubic centimeter of air.

b. "Ceiling Limit" - Military personnel and civilian employees shall not be exposed at any time to airborne concentrations of asbestos in excess of 10 fibers, longer than 5 micrometers, per cubic centimeters of air.

5. Tasks. Some examples of tasks which can generate concentrations of airborne asbestos which exceed permissible limits are:

Fabrication

Installation

Repair or removal ("rip-out") of asbestos insulation materials

Power sawing of asbestos-containing fire retardant building materials

Brake relining and repair work

6. Hazards. Inhalation of asbestos fibers can produce severe lung damage in the form of disabling or fatal fibrosis of the lungs, commonly referred to as Asbestosis. Asbestos has also been found to be a casual factor in the development of carcinoma of the lung and malignant mesothelioma (tumor) as well as cancer of the gastro-intestinal tract.

7. Engineering and Work Practice Control Measures

a. Engineering Methods

(1) Engineering controls such as, but not limited to, isolation enclosure, exhaust ventilation, collection shall be used to meet the exposure limits set forth in paragraph 4.

(2) Local exhaust ventilation control measures and dust collection systems shall be designed, constructed, installed and maintained in accordance with the American Conference of Governmental Industrial Hygienists (ACGIH) Ventilation Manual or the American National Standard, Fundamentals Governing the Design and Operation of Local Exhaust Systems - ANSI Z9.2 of 1971.

(3) All hand-operated and power-operated tools which may produce or release asbestos fibers in excess of the exposure limits such as, but not limited to, saws, scorers, abrasive wheels and drills shall be provided with local exhaust ventilation system. It is important to note that ventilation systems used to control asbestos emissions or exposure cannot be directly exhausted to the workroom or atmosphere. The use of High Efficiency Particulate Air (HEPA) filters with pre-filters or other collection systems approved by the cognizant Industrial Hygienist is required to prevent the inadvertent production of an exposure hazard.

b. Work Practices

(1) Insofar as practicable, asbestos shall be handled, mixed, applied, removed, cut, scored or otherwise worked in a wet state sufficient to prevent the emission of airborne filters in excess of the permissible exposure concentrations.

(2) No asbestos cement, mortar, coating, grout, plaster, or similar material containing asbestos shall be removed from bags, cartons, or other containers in which they are shipped, without either being wetted or enclosed, or ventilated so as to prevent effectively the release of airborne asbestos fibers in excess of the permissible limits.

(3) Asbestos free substitute material shall be tested under the technical management of cognizant headquarters activity and, if acceptable, shall be used in place of asbestos containing materials.

(4) Personnel engaged in the spraying of asbestos, the removal or demolition of pipes, structures, or equipment covered or insulated with asbestos shall be provided with respiratory protection, the wearing of which shall be rigidly enforced.

8. Personal Protective Equipment

a. Respiratory Protection

(1) Engineering control measures shall be employed to control and contain airborne asbestos fibers to the lowest feasible level. Compliance with permissible exposure limits shall not be achieved by the use of respirators except under the following conditions:

(a) during the time period necessary to commence engineering control measures,

(b) in work situations in which the control methods prescribed are not technically feasible, or feasible to an extent insufficient to reduce the airborne concentration of asbestos fibers below the maximum permissible limit, and

(c) during emergencies.

(2) A respirator program shall be established as described in the requirements of the American National Standards, Practices for Respiratory Protection, ANSI Z88.2-1969 (available from the American National Standards Institute, 1430 Broadway, New York, New York 10018), as embodied in 29 CFR 1910.134.

(3) Where a repsirator is required, it shall be selected from those approved for protection against exposure to asbestos by the Mining Enforcement and Safety Administration (MESA), or Mine Safety and Health Administration (MSHA), or the National Institute for Occupational Safety and Health (NIOSH).

(4) Reusable or disposable single-use air purifying respirators should be NIOSH/MESA/MSHA approved for protection against pneumoconiosis

and fibrosis producing dusts, including asbestos. They shall be used to reduce the concentrations of airborne asbestos fibers in the respirator below the permissible exposure concentrations, when the ceiling or the 8-hour time-weighted average concentration of asbestos fibers is reasonably expected to exceed no more than 10 times the limit, based on data obtained as a result of concentrations measurement.

(5) A full facepiece powered air purifying respirator, or a powered air purifying respirator shall be used to reduce the concentration of airborne asbestos fibers in the respirator below the permissible exposure concentration when the ceiling or the 8-hour time-weighted average concentration of asbestos fibers is reasonably expected to exceed 10 times, but not 100 times, the limit, based on data obtained as a result of concentrations measurement.

(6) A type "C" continuous flow of pressure-demand, supplied-air respirator shall be used to reduce the concentration of airborne asbestos fibers in the respirator below the permissible exposure limit when the ceiling or 8-hour time-weighted average airborne concentration of asbestos fibers is reasonably expected to exceed 100 times those limits, based on data obtained as a result of concentrations measurement.

(7) Breathing air and/or sources of breathing air for self-contained breathing apparatus and supplied-air respirators must conform to the requirements found in the following documents: 29 CFR 1910.134(d); Federal Specification BB-A-1034a of 21 June 1968, with Amendment 1 of 15 December 1970; and NAVFACINST 11300.24B of 2 August 1972.

(8) A person shall not be assigned to tasks requiring the use of respirators if, based upon his most recent medical examination, an

examining physician determines that the person will be unable to function normally wearing a respirator, or that the safety or health of the person or other personnel will be impaired by his use of a respirator.

T-file # 6240

17 Jan 80

Director, Natural Resources and Environmental Affairs Division

Director, Maintenance and Repair Division

PCB Transformer Management Plan and related PCB Concerns

Ref: (a) FoneCon btwn Mr. Cunanan, LantDiv, and Mr. J. Wooten, BMaintDept, on 4 Dec 79
(b) Engineering Service Request U9009 of Oct 78

Encl: (1) Cmdr NavFacEngCom ltr 114:PPC 6280 of 7 Dec 79
(2) Guide for the Management of Askarel (PCB) Transformers prepared by Versar Inc.

1. As a result of references (a) and (b), Lant/NavFacEngCom has forwarded enclosures (1) and (2) for use by Marine Corps Base, Camp Lejeune in dealing with PCB related transformer problems.

2. A review of enclosure (2) raises the following questions and potential concerns:

a. Are record keeping requirements on page 93 applicable to MCB?

b. Has MCB identified those transformers containing PCB (Askarel)? See page 1-4

c. Are MCB safety procedures addressing potential health hazards as discussed on pages 5 and 6 being followed?

3. Reference (a) indicates that a visit to MCB will be made by Lant/NavFacEngCom personnel during January to initiate preparation of a PCB Transformer Management Plan for Marine Corps Base.

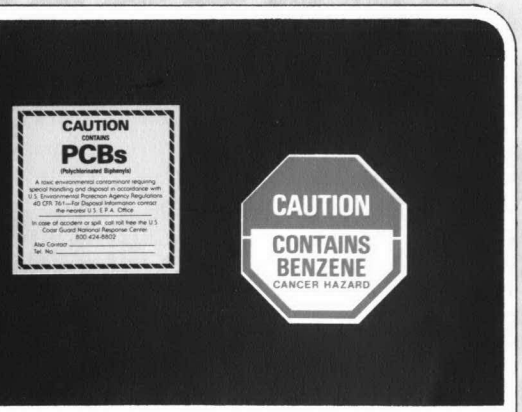
4. Point of contact is Mr. P. Cunanan (AUTOVON) 690-7313.

JULIAN I. WOOTEN

Copy to:
BMO (w/o encl)

1978 CATALOG

SUPPLEMENT



EPA • OSHA

labels for

PCBs • BENZENE
RESTRICTED PESTICIDES

LABELMASTER

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LABELMASTER
division of MODULAR PRODUCTS CORPORATION

6001 NORTH CLARK STREET
CHICAGO, ILLINOIS 60660
PHONE 312/973-5100 • TELEX 25-4519

Dear Friend and Valued Customer

This supplement is the first of a regular series to be issued between printings of our annual, full size catalog. Their intent is to inform you of marking and labeling requirements contained in new Regulations which appear to us to be of major and immediate interest to you, our customer. They are also by way of assuring you that any forthcoming requirements shall always be found in our inventory.

It should first be noted the Regulation for Benzene has been stayed by the courts until April 17, 1978. However, major companies have asked us to proceed with the labels and signs due to the relatively short compliance date. We are pleased to do so.

It should also be noted the final EPA rule defines a "PCB mixture" to mean any mixture with 500 parts per million of PCB. The Agency plans to shortly propose ". . . a lower concentration, possibly in the range of 50 ppm . . ." This criteria may have a further effect on your activities.

Also included are the new EPA Regulations for restricted pesticides. These will be found on pages 9 and 10.

A full reprint of the PCB Regulation is available by calling 800-424-9065. The OSHA Benzene reprint is available by calling 202-523-8034. Your comments and interest, as always, will be greatly appreciated.

Most cordially,

Harry Fund

Harry Fund
President

P.S. A space on the order card is provided to be certain you receive all future supplements.

Labeling for PCBs Excerpts from the Regulations

CHAPTER I—ENVIRONMENTAL PROTECTION AGENCY

SUBCHAPTER R—TOXIC SUBSTANCES CONTROL ACT

PART 761—POLYCHLORINATED BIPHENYLS (PCB's)

AGENCY: Environmental Protection Agency.

ACTION: Final rule.

SUMMARY: These regulations prescribe disposal and marking requirements for polychlorinated biphenyls (PCB's), and are promulgated pursuant to section 6(e)(1) of the Toxic Substances Control Act (Pub. L. 94-469). The intent of these regulations is to protect the environment from further contamination by PCB's resulting from improper handling and disposal of PCB's.

EFFECTIVE DATE: April 18, 1978

"PCB article" includes any manufactured item, other than PCB containers, whose surfaces have been in direct contact with PCB chemical substances or PCB mixtures. The definition includes commercial products, such as electrical capacitors and transformers, that have liquid PCB chemical substances and PCB mixtures contained within their internal mechanisms as a functioning part of the electrical device. Other examples of PCB articles are piping, pumps, radiators, and other components of heat transfer systems, as well as electric motors, that use PCB chemical substances and PCB mixtures as an internal coolant.

DISPOSAL AND MARKING REQUIREMENTS

The regulation applies to all persons who manufacture, process, distribute in commerce, use, or dispose of PCBs, including local, State, and Federal governments.

EFFECTIVE DATES

All containers of PCB liquids, not-in-service PCB transformers, and not-in-service large high voltage capacitors are required to be labeled by July 1, 1978. All transport vehicles carrying PCBs are required to be labeled beginning October 1, 1978. All in-service transformers, in-service large high voltage capacitors, and new equipment with small PCB capacitors are required to be labeled by January 1, 1979.

Subpart C—Marking of PCB's

(a) The following marking requirements shall apply:

(1) Each of the following items in existence on or after July 1, 1978 shall be marked as illustrated in Figure 1 in Annex V—Section 761.44(a): The mark illustrated in Figure 1 is referred to as ML throughout this subpart.

(i) PCB containers:

(ii) PCB transformers at the time of manufacture, at the time of distribution in commerce if not already labeled, and at the time of removal from use if not already labeled;

(iii) PCB large high voltage capacitors at the time of manufacture, at the time of distribution in commerce if not already labeled, and at the time of removal from use if not already labeled;

(iv) Equipment containing a PCB transformer or a PCB large high voltage capacitor at the time of manufacture, at the time of distribution in commerce if not already labeled, and at the time of removal of the equipment from use if not already labeled.

(v) PCB large low voltage capacitors at the time of removal from use.

(vi) Electric motors using PCB coolants.

(vii) Hydraulic machinery using PCB hydraulic fluid.

(viii) Heat transfer systems (other than transformers) using PCB's.

(ix) PCB article containers containing articles or equipment that must be marked under provisions (i) through (viii) above.

(x) Each storage area used to store PCB's for disposal.

(2) As of October 1, 1978, each transport vehicle loaded with PCB containers with more than 45 kg. (99.4 lbs.) of PCB chemical substances or PCB mixtures in the liquid phase or with one or more PCB transformers shall be marked with ML as described in Annex V—section 761.44(a).

(3) As of January 1, 1979, the following PCB's shall be marked with mark ML as described in Annex V—section 761.44(a):

(i) All transformers not marked under paragraph (1) of this section;

(ii) All large high voltage capacitors not marked under paragraph (1) of this section in accordance with one of the following methods;

(A) each individual capacitor is to be marked with mark ML, or

(B) if one or more PCB large high voltage capacitors are installed in a protected location as on a power pole, or structure, or fence is to be marked with mark ML and a record or procedure identifying the PCB capacitors is to be maintained by the owner or operator at the protected location.

(4) As of January 1, 1979, all PCB equipment containing a small PCB capacitor at the time of manufacture shall be marked with the statement "This equipment contains PCB capacitor(s)". The mark shall be one of the same size as the mark ML.

(5) Where mark ML is specified but the PCB article or PCB equipment is too small to accommodate the smallest permissible size of mark ML, mark Ms as described in Annex V —Sec. 761.44(b), may be used instead of Mark ML.

(6) Each large low voltage capacitor, each small capacitor normally used in alternating current circuits, and each fluorescent light ballast manufactured between July 1, 1978 and July 1, 1998 that does not contain PCB's shall be marked by the manufacturer at the time of manufacture with the statement, "No PCB's". The mark shall be of similar durability and readability as other markings that indicate electrical information, part numbers, or manufacturer's name.

CONTINUED

761.44 MARKING FORMATS

(b) Small PCB Mark—Ms—Mark Ms shall be as shown in Figure 2, letters and striping on a white or yellow background, and shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the equipment or container. The mark shall be a rectangle 2.5 by 5 cm (1 inch by 2 inches). If the PCB equipment is too small to accommodate this size, the mark may be reduced in size proportionately down to a minimum of 1 by 2 cm (.4 by .8 inches).

"NO PCB's" 761.20(a)(6)

(6) Each large low voltage capacitor, each small capacitor normally used in alternating current circuits, and each fluorescent light ballast manufactured between July 1, 1978 and July 1, 1998 that does not contain PCB's shall be marked by the manufacturer at the time of manufacture with the statement, "No PCB's". The mark shall be of similar durability and readability as other markings that indicate electrical information, part numbers, or manufacturer's name.

NO PCBs

Style PCNL
1" x 2"

Style PCNS
½" x 1"

Other Sizes Available Upon Request

SMALL PCB MARK Ms

Style PC-.5
½" x 1"

Style PC-1
1" x 2"

Convenient Rolls of 500

Pressure Sensitive

CAUTION CONTAINS **PCBs**
(Polychlorinated Biphenyls)
FOR PROPER DISPOSAL INFORMATION
CONTACT U.S. ENVIRONMENTAL
PROTECTION AGENCY

Both the small PCB mark and the "No PCB's" label are provided in a special Labelmaster construction. Base of the construction is a printed vinyl which is then over-laminated with a 1 mil DuPont Tedlar® film to provide maximum performance as required by the Regulations. The pressure sensitive acrylic adhesive is particularly aggressive to assure excellent adhesion at application. Special sizes of the "No PCB's" label may be ordered under special quotation. Labels on this page may be cumulatively grouped for best quantity price.

PRICES: Prices shown are per 1000 (M) labels except 500 which is lot price.

Style	500	1000	3000	6000	12000	24000	48000
PC-.5	$15.75	$19.75	$15.75	$14.50	$12.75	$11.25	$10.50
PC-1	$22.00	$30.00	$27.00	$24.75	$22.75	$21.00	$19.00
PCNL	$22.00	$30.00	$27.00	$24.75	$22.75	$21.00	$19.00
PCNS	$15.75	$19.75	$15.75	$14.50	$12.75	$11.25	$10.50

Immediate Shipment of Phone Orders—312/973-5100

LARGE PCB MARK ML

Standard

Style PC-2
2" x 2"

Style PC-4
4" x 4"

Style PC-6
6" x 6"

CAUTION
CONTAINS
PCBs
(Polychlorinated Biphenyls)
A toxic environmental contaminant requiring special handling and disposal in accordance with U.S. Environmental Protection Agency Regulations 40 CFR 761—For Disposal Information contact the nearest U.S. E.P.A. Office.
In case of accident or spill, call toll free the U.S. Coast Guard National Response Center: 800.424-8802
Also Contact _____
Tel. No. _____

Personalized

Style PC-4P
4" x 4"

Style PC-6P
6" x 6"

Removable Vehicle Decals

Style PSR-80
8½" x 8½"

The PC Series of pressure sensitive labels are produced under the most advanced procedures available. A highly durable 2 mil vinyl is silk screened with acrylic paints. A special clear coat cured by ultra-violet reactor is then applied. This protective coating provides exceptional resistance to most solvents and to concentrated acids and caustics. The removable vinyl truck decals will remain applied as long as required, yet remove easily without residue.

PRICES: All prices shown are per each label. Cumulative quantity may be applied.

Style	100	500	1000	2500	5000	10,000	25,000
PC-2 PC-2N	.06¢	.055¢	.05¢	.047¢	.044¢	.041¢	.038¢
PC-4 PC-4N	20¢	17¢	.155¢	14¢	13¢	12¢	11¢
PC-6 PC-6N	33¢	30¢	.275¢	26¢	.245¢	23¢	22¢
PC-4P	X	X	X	20¢	17¢	15¢	13¢
PC-6P	X	X	X	38¢	34¢	30¢	27¢
PSR-80	28¢	25¢	23¢	22¢	21¢	20¢	19¢

IMPORTANT NOTE: Personalization is an option—*not* a requirement.

MARKING FORMAT—761.44

The following formats shall be used for marking:

(a) Large PCB Mark—ML—Mark ML shall be as shown in Figure 1, letters and striping on a white or yellow background and shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the equipment or container. The size of the mark shall be at least 15.25 cm (6 inches) on each side. If the PCB equipment is too small to accommodate this size, the mark may be reduced in size proportionately down to a minimum of 5 cm (2 inches) on each side.

"This Equipment Contains..." 761.20(2)(4)

(4) As of January 1, 1979, all PCB equipment containing a small PCB capacitor at the time of manufacture shall be marked with the statement "This equipment contains PCB capacitor(s)". The mark shall be one of the same size as the mark ML.

THIS
EQUIPMENT
CONTAINS
PCB
(Polychlorinated Biphenyls)
CAPACITOR(S)

PC-2N
2" x 2"

PC-4N
4" x 4"

PC-6N
6" x 6"

§ 1910.1028 Benzene

(a) *Scope and application.* (1) This section applies to each place of employment where benzene is produced, reacted, released, packaged, repackaged, stored, transported, handled, or used.

(2) This section does not apply to:

(i) The storage, transportation, distribution, dispensing, sale or use as fuel of gasoline, motor fuels, or other fuels subsequent to discharge from bulk terminals; or

(ii) The storage, transportation, distribution or sale of benzene in intact containers sealed in such a manner as to contain benzene vapors of liquid, except for the requirements of paragraph (k) (2), (3), (4), and (5), and paragraph (j) of this section. (See Opposite Page).

* * * * * *

OSHA List of Industries Affected

Petroleum refineries, coke plants, petrochemicals, bulk terminals, oil and gas producers, tank car and tank truck facilities, barges and marine tankers, laboratories, rubber products, adhesives, paint, strippers, printing ink, gravure printing, motors and generators, paper mills, wood furniture.

OSHA SIGN FOR BENZENE

Style SB-10 14" x 10"
Style SB-20 20" x 14"

Both SB-10 and SB-20 are provided in .040", mill-coated acrylic white aluminum to provide maximum durability. Copy is silk-screened and high baked. Each sign is radius cornered with mounting holes pre-drilled.

PRICES: Sizes may be grouped for best quantity price.

Style	1-4	5-11	12-49	50-99	100-499	500-999	1000 up
SB-10	5.75	4.35	3.90	3.65	3.35	3.10	2.85
SB-20	6.85	6.25	5.75	5.35	4.95	4.60	4.25

Immediate Shipment on Phone Orders—312/973-5100

OSHA LABELS FOR BENZENE

STANDARD ROLL LABELS

BR-2	2" x 2"
BR-4	4" x 4"

SUPER VINYL LABELS

BV-2	2" x 2"
BV-4	4" x 4"

REMOVABLE VINYL PLACARD

PSR-85	8½" x 8½"

7 YEAR PERMANENT DECALS FOR STORAGE TANKS OR VEHICLES

ST-8	8½" x 8½"
ST-15	15" x 15"

Size of label should be chosen so as to be "readily visible", or proportionate to container. Standard rolls of printed paper pressure sensitive labels are for packings not subject to extended exposure. 2" x 2" Super Stick Vinyl is for laboratory samples which are reused, or wherever long exposure is required. 4" Super Vinyl is for drums and other containers. Removable vinyl placard will adhere as long as required. Storage tank/vehicle permanent decals are for exceptional long life.

PRICES: Styles may be grouped for best quantity price.

Style	100	500	1000	3000	6000	12000	24000
BR-2	X	9.75 lot	12.75M	8.95M	7.75M	6.50M	5.75M
BR-4	X	16.00 lot	21.00M	16.00M	14.50M	13.50M	12.75M
BV-2	12.75 lot	21.00 lot	27.50M	24.00M	22.50M	19.50M	17.00M
BV-4	19.75 lot	32.00 lot	50.00M	42.00M	39.00M	38.00M	37.00M
PSR-85	.30 ea.	.27 ea.	.24 ea.	.22 ea.	.20 ea.	.19 ea.	.18 ea.
ST-8	.95 ea.	.80 ea.	.70 ea.	.67 ea.	.65 ea.	.62 ea.	.60 ea.
ST-15	2.25	2.10	1.90	1.75	1.60	1.60	1.60

Telex Orders Toll-Free—See Next Page

(k) *Signs and labels.* (1) The Employer shall post signs in regulated areas bearing the following legend:

DANGER
BENZENE
CANCER HAZARD
FLAMMABLE—NO SMOKING
AUTHORIZED PERSONNEL ONLY
RESPIRATOR REQUIRED

(2) The employer shall assure that caution labels are affixed to all containers of benzene and of products containing any amount of benzene, except:

(i) Pipelines, and

(ii) Transport vessels or vehicles carrying benzene or benzene products in sealed intact containers.

(3) The employer shall assure that the caution labels remain affixed when the benzene or products containing benzene are sold, distributed or otherwise leave the employer's workplace.

(4) The caution labels required by paragraph (k)(2) of this section shall be readily visible and legible. The labels shall bear the following legend:

CAUTION
CONTAINS BENZENE
CANCER HAZARD

(5) The employer shall assure that no statement which contradicts or detracts from the information required by paragraphs (k)(1) and (k)(4) of this section appears on or near any required sign or label.

Title 40—Protection of Environment

CHAPTER I—ENVIRONMENTAL PROTECTION AGENCY

(FRL 840-3; OPP-30016B)

SUBCHAPTER E—PESTICIDE PROGRAMS

PART 162—REGULATIONS FOR THE ENFORCEMENT OF THE FEDERAL INSECTICIDE, FUNGICIDE, AND RODENTICIDE ACT

Optional Procedures for Classification of Pesticide Uses by Regulation

AGENCY: Environmental Protection Agency, Office of Pesticide Programs.

ACTION: Final rule.

SUMMARY: This rule establishes the procedures to be followed by registrants when a use of a pesticide product is classified for restricted use by regulation. This rule sets forth deadlines for submittal of appropriate applications for amended registration, label and labeling requirements for products with uses classified for restricted use by regulation, and deadlines for compliance with the label and labeling requirements. This notice also amends regulations concerning labeling requirements by deleting the requirement for applicator categories on the label and by revising the restricted use classification label statement.

EFFECTIVE DATE: February 9, 1978.

FOR FURTHER INFORMATION CONTACT:

James H. White, Project Leader (WH-570), Office of Pesticide Programs, Environmental Protection Agency, Room E509A, 401 M Street SW., Washington, D.C. 20460, 202-755-8297.

EPA—RESTRICTED PESTICIDES LABEL

RESTRICTED USE PESTICIDE

FOR RETAIL SALE TO AND USE ONLY BY CERTIFIED APPLICATORS OR PERSONS UNDER THEIR DIRECT SUPERVISION AND ONLY FOR THOSE USES COVERED BY THE CERTIFIED APPLICATOR'S CERTIFICATION.

RP-4 LABELMASTER, CHICAGO, IL 60660

Style RP-4
2" x 4"

Style VP-6
3" x 6"

The Restricted Pesticide label is available in two styles. RP-4 is our standard pressure sensitive paper, rolls of 500. RP-4 is recommended for 5 gallon pails. VP-6 is our super vinyl label. It is recommended for drums which may be subjected to possible extended exposure.

PRICES: Styles may be grouped for best quantity price.

Style	500	1,000	3,000	6,000	12,000	24,000
RP-4	12.75 lot	17.50M	12.00M	10.75M	9.45M	8.95M
VP-6	30.00 lot	45.00M	42.00M	40.00M	39.00M	38.00M

Customized Labels Available Upon Request.

EXCERPTS FROM THE REGULATION

§ 162.10 Labeling requirements.

(j) ***

(2) *Restricted Use Classification.* Pesticide products bearing direction for use(s) classified restricted shall bear statements of restricted use classification on the front panel as described below:

(i) *Front panel statement of restricted use classification.* (A) At the top of the front panel of the label, set in type of the same minimum sizes as required for human hazard signal words (see table in § 162.10(h)(l)(iv)), and appearing with sufficient prominence relative to other text and graphic material on the front panel to make it unlikely to be overlooked under customary conditions of purchase and use, the statement "Restricted Use Pesticide" shall appear.

(B) Directly below this statement on the front panel, a summary statement of the terms of restriction imposed as a precondition to registration shall appear. If use is restricted to certified applicators, the following statement is required: "For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification." If, however, other regulatory restrictions are imposed, the Administrator will define the appropriate wording for the terms of restriction by regulation.

40 CFR Part 162 is herewith amended by adding the new paragraphs (d) through (i) to § 162.30, reading as follows:

(g) *Label and labeling.* (1) A pesticide product which has a use classified for restricted use shall bear a label, or to the extent permitted by paragraph (i) be accompanied by supplemental labeling or have supplemental labeling affixed, which contains the statements of restricted use classification required by § 162.10(j)(2) or, if applicable, the language specified in the final rule under paragraph (c)(4) of this section. If any use of a pesticide product has been classified for restricted use, any labeling (other than supplemental labeling) accompanying the product shall contain directions for use which are consistent with the terms of the restriction.

(2) Pesticide products intended solely for manufacturing use in the formulation of other registered pesticide products are not subject to the classification label and labeling requirements of this section.

(i) *Enforcement.* (1) No product with a use classified under this section for restricted use may be released for shipment by the registrant or producer after the 120th day after the effective date of the final rule unless the product bears an approved amended label which complies with paragraph (g), has the supplemental labeling affixed, or is accompanied by supplemental labeling.

(2) No product with a use classified under this section for restricted use may be distributed or sold by a retailer or other person after the 270th day after the effective date of the final rule unless the product bears an approved amended label which complies with paragraph (g), has the supplemental labeling affixed, or is accompanied by supplemental labeling.

(3) No product with a use classified under this section for restricted use may be released for shipment by the registrant or producer after the 270th day after the conditional acceptance of the draft amended label (or after approval of the final amended label, if the registrant does not submit a draft amended label), unless the product bears the final approved amended label.

(4) In cases where a registrant submits an application for amended registration in accordance with paragraph (d)(2)(ii) of this section to delete the restricted uses of a pesticide product, no such product may be released for shipment by the registrant or producer after the 180th day after the conditional acceptance of the draft amended label (or after approval of the final amended label, if the registrant does not submit a draft amended label), unless the product bears the final approved amended label.

(5) No product with a use classified under this section for restricted use may be advertised without including the classification assigned to it after the 120th day after the effective date of the final rule. However, brochures, technical pamphlets and similar material which are in final printed form on the effective date of the final rule may be distributed until the 270th day after the effective date of the final rule.

ABOUT *Labelmaster*

Labelmaster is presently the single largest manufacturer of Department of Transportation labels, placards, signs, and shipping forms. We serve the nation's leading producers and shippers of chemicals, paints, etc. as well as the air, water, highway and rail transportation community. 1978 marks our 10th anniversary . . . and we look forward to serving those of you with whom we have not yet had the pleasure of doing business. A copy of our full hazardous materials catalog is available at no charge.

* * * * * *

HOW TO ORDER

Orders may be placed directly by phone, by toll-free Telex, through your own company purchase order, or by the Order Form on the adjoining page. Please be sure to show full shipping information on reverse side of the latter. We will be happy to assist in any technical questions having to do with this program.

TERMS & CONDITIONS

- All prices shown are f.o.b. Chicago
- Minimum order $15.00 unless otherwise authorized
- Terms are net 30 days
- Open account to all rated companies. Others are required to send check with order.

All orders are subject to acceptance by our corporate headquarters in Chicago. Due to the requirements of proofing and inspection, as regards customized materials, acceptance of a 10% overrun or underrun is understood. Proofs will not be submitted for such orders unless specifically made a part of your purchase order. Custom orders are not subject to cancellation unless payment is made for such artwork, plates, and other such preparation expenses which may have been incurred. Labelmaster products are warranted as to materials and workmanship at the time shipped. It is the responsibility of the purchaser to ascertain for himself the values of these products through his own use testing. Labelmaster's obligation shall be limited to replacement of defective materials. Under no circumstances shall Labelmaster or its agents be held liable for losses, damages, or any other expenses which may be incurred by use of our product. Products may not be returned without prior written notice from our office. Specifications, prices and delivery are subject to change without notice. Intermediate quantities are available and appear in our computer. Prices will naturally fall between those shown to either side of the quantity ordered.

24 HR. TOLL FREE ordering

You can place your order by phone, at any hour, and completely toll-free!

1. Phone 800-325-6000 at any time. In Missouri 800-342-6700. In some exchanges you must dial 1 first.
2. Tell Operator: "This is a Labelmaster Order — I.D. Number 3147.
3. Give operator phone number and city you are calling from.
4. Dictate your order: Ship to, Invoice to (if different), Style No. (i.e. PC-6 etc.), Description (i.e. 6" PCB label), Quantity, Purchase Order No. and your name. We'll receive your order within minutes.

ORDER FORM

ROUTING
ENGINEERING
PLANT MANAGER
PURCHASING
SAFETY DEPT.

LABELMASTER 6001 N. CLARK ST., CHICAGO, ILLINOIS 60660
Please enter our order for the following PCB labels:

STYLE	DESCRIPTION	QUANTITY	UNIT	PRICE	TOTAL
PC-.5	½" x 1" SMALL PCB MARK Ms				
PC-1	1" x 2" SMALL PCB MARK Ms				
PCNL	1" x 2" "NO PCB's"				
PCNS	½" x 1" "NO PCB's"				
PC-2	2" x 2" LARGE PCB MARK ML				
PC-4	4" x 4" LARGE PCB MARK ML				
PC-6	6" x 6" LARGE PCB MARK ML				
	PERSONALIZED LABELS				
PC-4P	4" x 4" LARGE PCB MARK PERSONALIZED				
PC-6P	6" x 6" LARGE PCB MARK PERSONALIZED				
	TRANSPORT VEHICLE LABELS				
PSR-80	8½" x 8½" REMOVABLE VINYL TRUCK LABEL				
	NEW EQUIPMENT REQUIREMENT 1-1-79				
PC-2N	2" x 2" "THIS EQUIPMENT CONTAINS"				
PC-4N	4" x 4" "THIS EQUIPMENT CONTAINS"				
PC-6N	6" x 6" "THIS EQUIPMENT CONTAINS"				

ORDER FORM CONTINUES NEXT PAGE

ORDER FORM CONTINUED

STYLE	DESCRIPTION	QUANTITY	UNIT	PRICE	TOTAL
BR-2	2" x 2" STANDARD BENZENE ROLLS				
BR-4	4" x 4" STANDARD BENZENE ROLLS				
BV-2	2" x 2" BENZENE SUPER LABELS				
BV-4	4" x 4" BENZENE SUPER LABELS				
BS-10	14" x 10" BENZENE ALUMINUM SIGN				
BS-20	20" x 14" BENZENE ALUMINUM SIGN				
PSR-85	8½" x 8½" REMOVABLE VINYL PLACARD				
ST-8	8½" x 8½" PERMANENT TANKS/VEHICLES				
ST-15	15" x 15" PERMANENT FOR STORAGE TANKS				
RP-4	2" x 4" RESTRICTED PESTICIDES, STD.				
VP-6	3" x 6" RESTRICTED PESTICIDES, VINYL				

COMPANY NAME _____ ORDER NO. _____ DATE _____

BILLING ADDRESS _____ SHIPPING ADDRESS (IF DIFFERENT) _____

CITY _____ STATE _____ ZIP _____ CITY _____ STATE _____ ZIP _____

ORDERED BY _____ SIGNED _____ PHONE: CODE _____

- ☐ Check Enclosed
- ☐ We are rated. Ship Open Account.
- ☐ Please send us _____ additional copies of this supplement for interplant distribution.
- ☐ Please place our name on mailing list for:
  - ☐ Acrylonitrile ☐ D.O.T. ☐ All supplements

Personalization for Style PC-4P - PC-6P option only.

Also Contact: _____

Tel. No. _____

LABELMASTER SPECIFICATIONS FOR PCB MARKINGS

GENERAL

EPA Label longevity requirements for PCB markings, are extremely demanding. Paragraph 761.44(b) states in part "... shall be sufficiently durable to equal or exceed the life (including storage for disposal) of the equipment or container."

The specific exposures, namely, ultra-violet from the sun, other weathering, and underground environment rule out most standard label materials. Clear films such as Mylar®, acetates or vinyls do comparatively little to shunt the sun's ultra violet. Longevity is therefore limited to the life of the paint or ink medium.

We are fortunate to have recently installed an Ultra-Violet Reactor in our facility. This equipment makes it possible for us to produce in the most advanced silk-screening process available. Both the printing and clear film are extremely impervious to most solvents, acids and caustics; and they provide excellent resistance to ultra-violet.

In the case of the small markings, we are using a Tedlar® laminate, long respected as an outstanding film for protecting against ultra-violet. Both of these processes are to avoid your having to replace these markings every few years.

Specifications For Large PCB Mark (Styles PC-2, PC-4, PC-6 and N Series)

Material shall be 2 mil, cast vinyl with a seven year rating. Copy shall be silk screened with special polyurethane-based paints. A polyurethane-based clear-coat shall then be silk screened over the entire surface. Both color and clear shall be cured by an Ultra Violet Reactor. Labels are to be provided in shrink-wrapped packages of 100.

Specification For Small PCB Mark (Styles PC-1, PC-5, PCNL, PCNS)

Labels shall be a printed vinyl, overlaminated with a one mil Tedlar film. Labels to be provided in rolls of 500. An aggressive acrylic pressure sensitive adhesive shall be used throughout.

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