

ASSISTANT CHIEF OF STAFF, FACILITIES  
HEADQUARTERS, MARINE CORPS BASE

DATE 12-4-87

TO:

BASE MAINT O  
PUBLIC WORKS O  
COMM-ELECT O

DIR, FAMILY HOUSING  
DIR, BACHELOR HOUSING  
BASE FIRE CHIEF

DIR., NAT. RESOURCES & ENV. AFFAIRS

ATTN: McShay

1. Attached is forwarded for info/action.

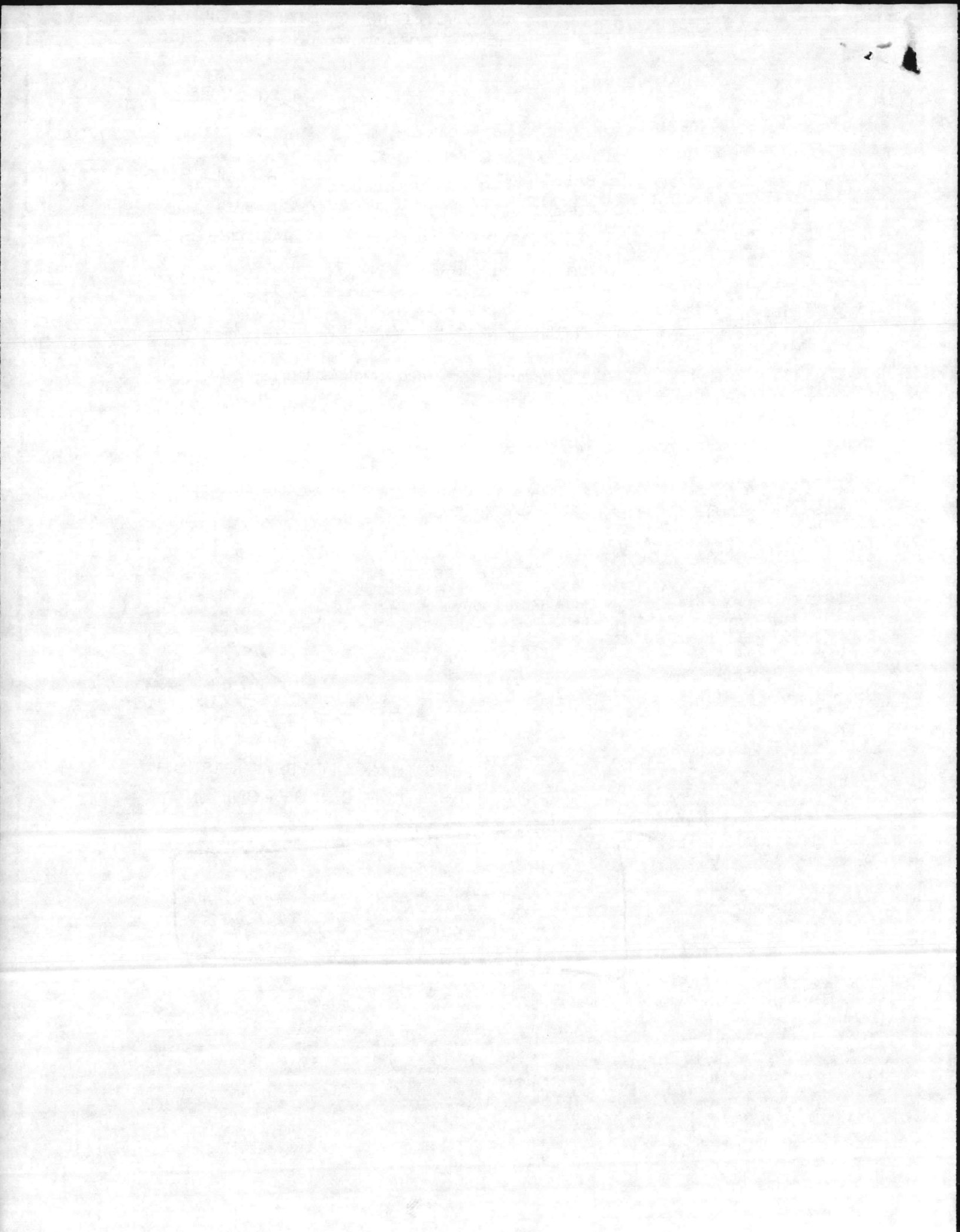
2. Please initial, or comment, and return all papers to this office.

3. Your file copy.

*B. W. B. Sr.*  
*B. W. B. Jr.*

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

*See,  
Make copy to NREA*





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

Col Waddell. 4

*BWR*

IN REPLY REFER TO:

6280

GSO

2 DEC 1987

From: Commanding Officer, Marine Corps Air Station, New River  
To: Commanding General, Marine Corps Base, Camp Lejeune,  
North Carolina 28542 (Attn: Assistant Chief of Staff,  
Facilities)

Subj: UNAUTHORIZED DISPOSAL OF HAZARDOUS WASTE INTO WASTE OIL

Ref: (a) CG MCB CL msg 182022Z Nov 87

1. Reference (a) requested status of actions taken to preclude the disposal of hazardous waste (HW) into waste oil tanks. The following has been completed or is in progress:

a. The contents of waste oil tanks previously identified as containing freon will be pumped into 55-gallon drums and treated as HW. Field test kits have been ordered and upon receipt, waste oil tanks will be tested every other week for contamination. Quality assurance tests will be made by Group/Station personnel on a routine basis.

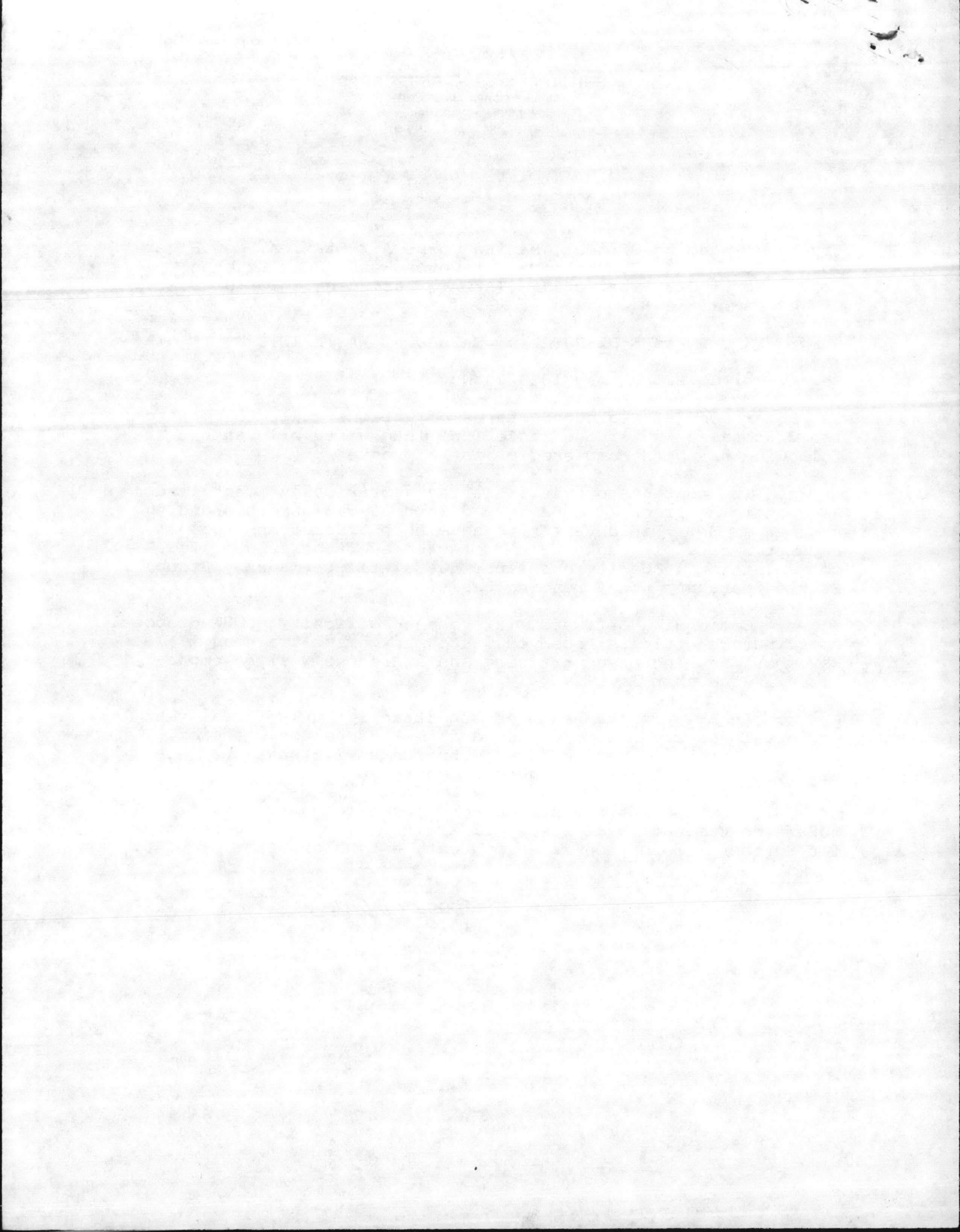
b. Commanding officers, maintenance officers and HW disposal coordinators/officers received waste management training 17-19 November, and increased training and awareness will be emphasized at the shop levels.

c. An R-1 project has been submitted for this fiscal year to install concrete bermed pads and new 550-gallon waste oil tanks for each generating area. The tanks will have the capability of being locked and access controlled.

2. This Command shares your concern and efforts to prevent future contamination of waste oil are on-going. Point-of-contact for further information is Mary Wheat, extensions 6518 or 6686.

*B. D. Waddell*  
B. D. WADDELL







6 Oct 1987

DRMO-ZWH

PAGE 2

1st Incl

SUBJECT: Disposal Of Waste Oil

TO: DRMR-MOH  
Attn: Ms. Jewell Dempsey

1. This letter is hereby forwarded for your action. Delivery orders have been submitted on the waste oil.
2. Due to lack of storage and the short time frame the State of North Carolina has given for storage of this waste oil, request emergency funding be provided for all waste oil stored on the Camp Lejeune Complex.

Nadine Hipp  
Chief, Defense Reutilization  
and Marketing Office

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

IN REPLY REFER TO:

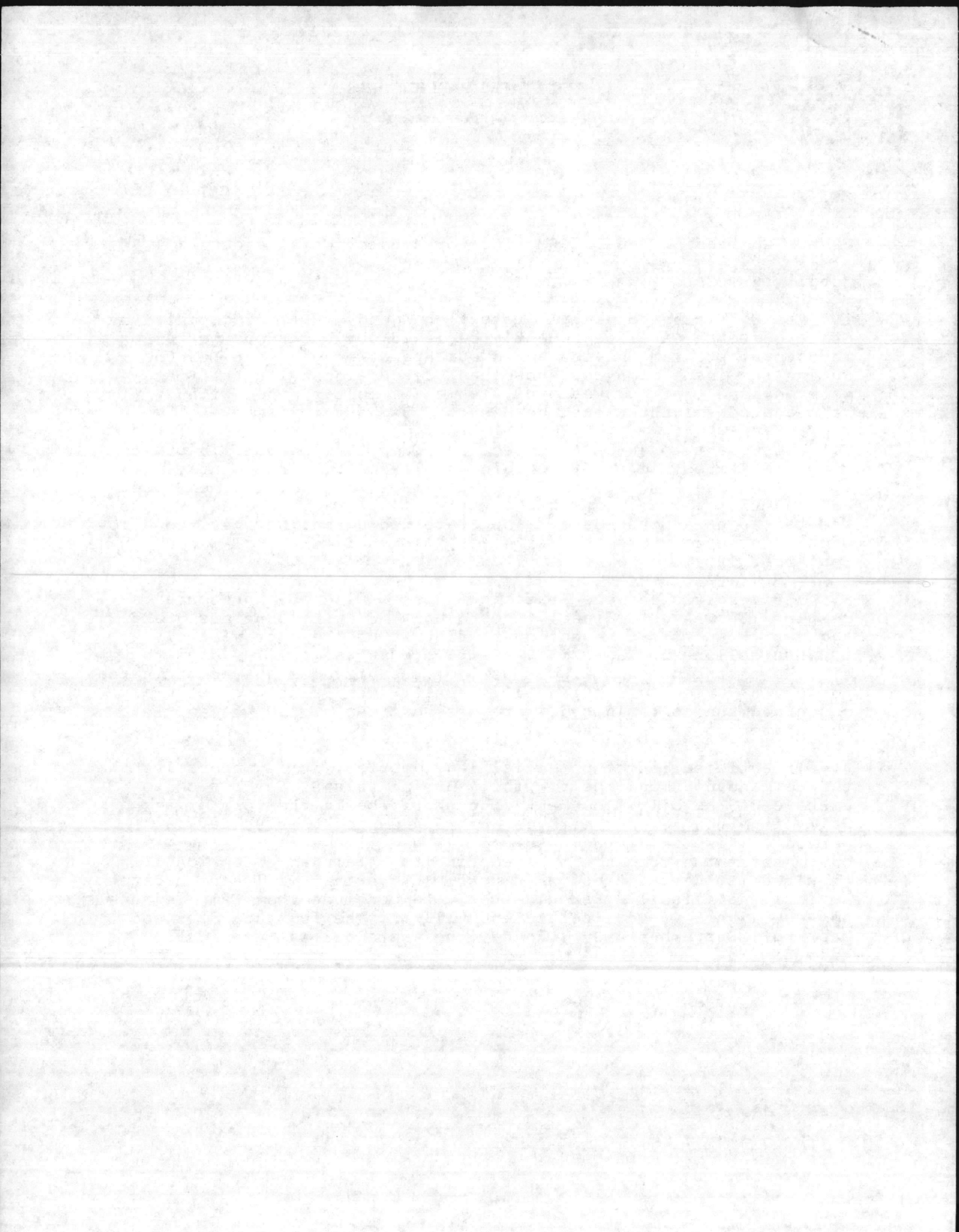
6280/2  
FAC  
OCT 02 1987

From: Commanding General, Marine Corps Base, Camp Lejeune

Subj: DISPOSAL OF WASTE OIL

1. The U. S. Environmental Protection Agency (EPA) accompanied by State of North Carolina recently reviewed our hazardous waste management program and inspected our operations at Camp Lejeune. During the inspection and subsequent discussions with the State, we were advised that our waste oil, which is contaminated with halogenated solvents, must be disposed as hazardous waste.
2. Subsequent to the EPA inspection, Camp Lejeune officials met with the State to clarify certain requirements, particularly, procedures and time limits for disposal of waste oil. The State advised that all seven tanks of waste oil at Camp Lejeune must be treated as hazardous waste. The State did agree, however, to allow Camp Lejeune to store the waste for 90 days from actual discovery (1 September 1987).
3. It is very clear the State is under considerable pressure to comply with EPA guidelines. Accordingly, Camp Lejeune must take aggressive and positive action to dispose of the approximately 400,000 gallons of waste oil. Camp Lejeune has only 90 days to dispose of the oil and if disposal of the oil does not occur in that period, a serious violation will result. The State was extremely concerned the contaminated waste oil has been stored at Camp Lejeune for up to two years already.
4. In anticipation of potential legal action, it is imperative that the Command document their efforts during this 90 day period to dispose of the oil. Documentation should be in the form of a daily log that records efforts each day during this 90 day period to dispose of the waste oil. This documentation/log will not only assist the Command in attempting to attain an extension if required (30 days extension is possible), but it will also negate any criminal liability should the State conclude that Camp Lejeune's non-compliance was deliberate and willful. The log should extend back to 1 September 1987 (the day the waste oil was deemed to be hazardous).







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

IN REPLY REFER TO:

6280/2  
FAC  
OCT 02 1987

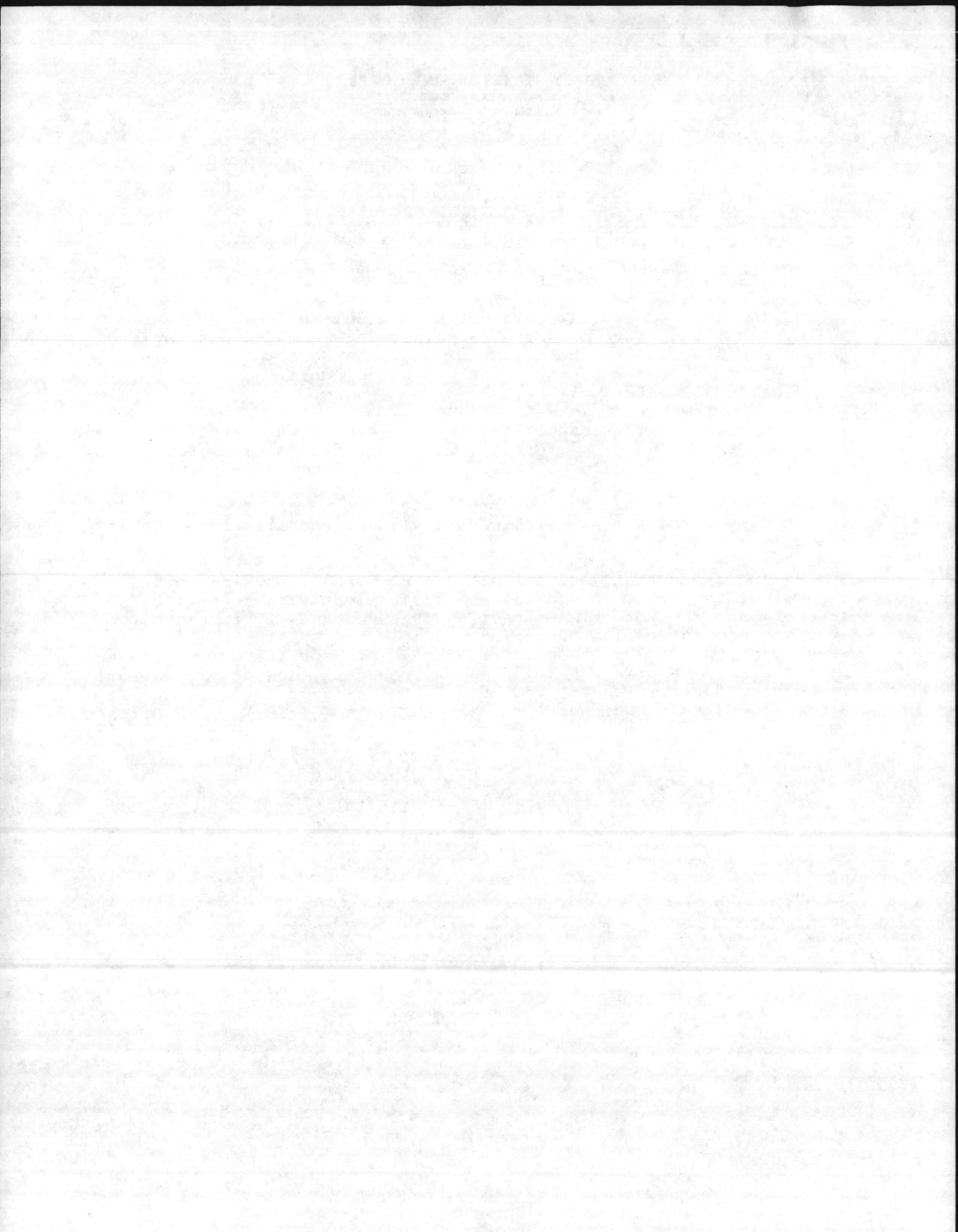
From: Commanding General, Marine Corps Base, Camp Lejeune  
To: Chief, Defense Reutilization and Marketing Office

Subj: DISPOSAL OF WASTE OIL

1. During the recent inspection by U. S. Environmental Protection Agency (EPA) and State of North Carolina, this Command was advised that our waste oil must be disposed as a hazardous waste. This requirement is caused by the waste oil being contaminated with halogenated solvents.
2. Subsequent to the inspection, the State of North Carolina agreed to allow Camp Lejeune to store the waste oil for 90 days from actual discovery that the waste oil contained the halogen (1 September 1987). Accordingly, the waste oil must be removed by 1 December 1987. There is a possibility of a 30 day extension if Camp Lejeune cannot dispose of the oil within 90 days; however, it is desirable the oil be removed without having to request an extension.
3. We are aware that your office is and has been working toward removal of the oil. In view of the discussions with the State, however, and the potential impact on this Command, it is requested that you provide a plan of action and milestones which will ensure removal of the oil by the required date. By separate correspondence we are also requesting that you maintain a daily log of your effort in this endeavor. Request you provide the plan of action and milestones to Commanding General (Attn: AC/S, Facilities) by 12 October 1987.

  
T. J. DALZELL  
By direction

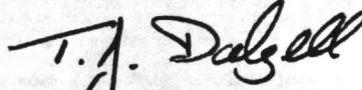
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NREAD  
SJA



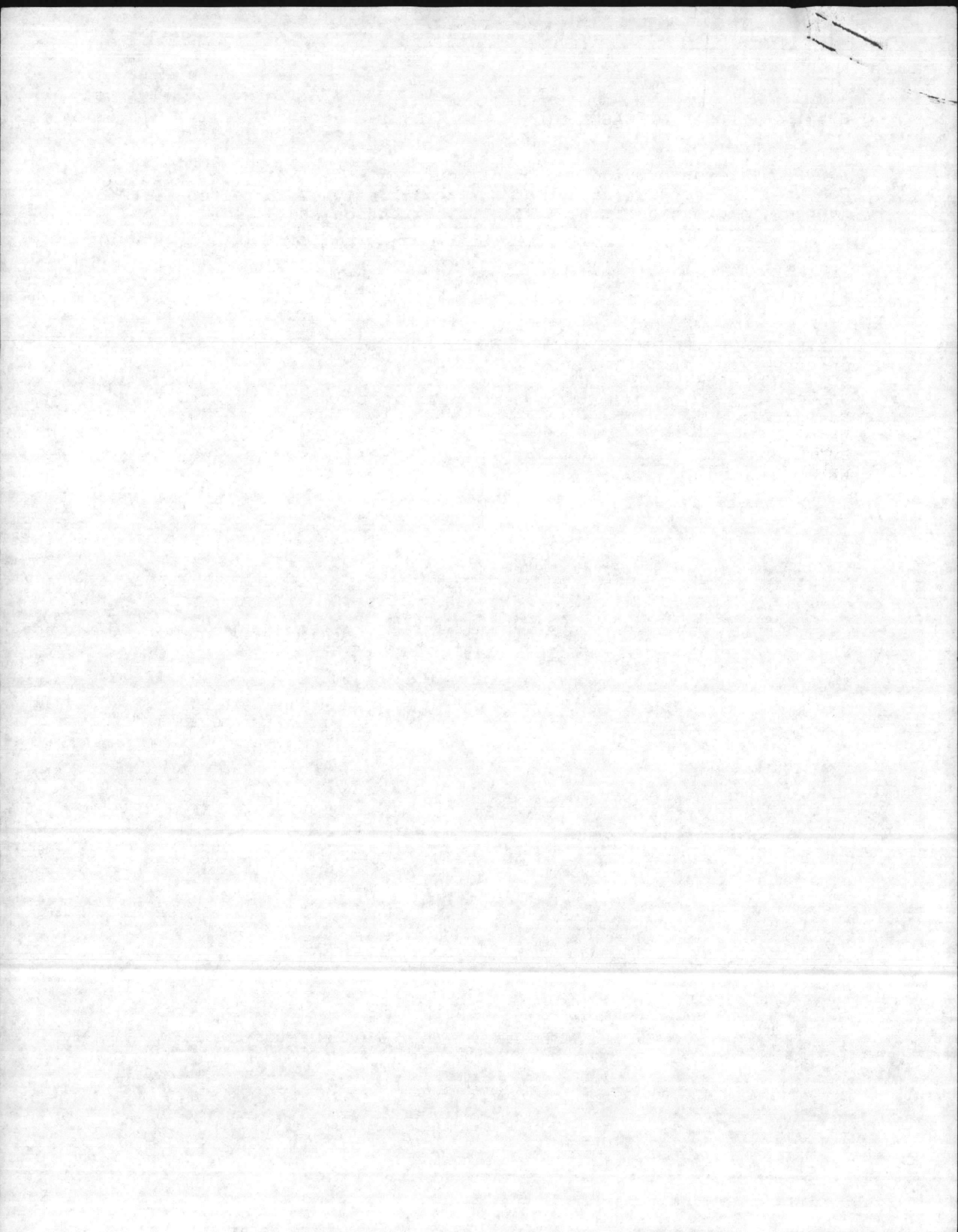


Subj: DISPOSAL OF WASTE OIL

5. Request you provide a copy of your log on a weekly basis to the Commanding General, (Attn: AC/S, Facilities). Point of contact for further information is B. W. Elston, extension 3034.

  
T. J. DALZELL  
By direction

Distribution:  
AC/S COMPT  
AC/S LOG  
SJA  
FacMgmtO  
DRMO  
BMO  
NREAD



ASSISTANT CHIEF OF STAFF, FACILITIES  
HEADQUARTERS, MARINE CORPS BASE

DATE 12-4-87

TO:

BASE MAINT O

DIR, FAMILY HOUSING

PUBLIC WORKS O

DIR, BACHELOR HOUSING

COMM-ELECT O

BASE FIRE CHIEF

DIR., NAT. RESOURCES & ENV. AFFAIRS

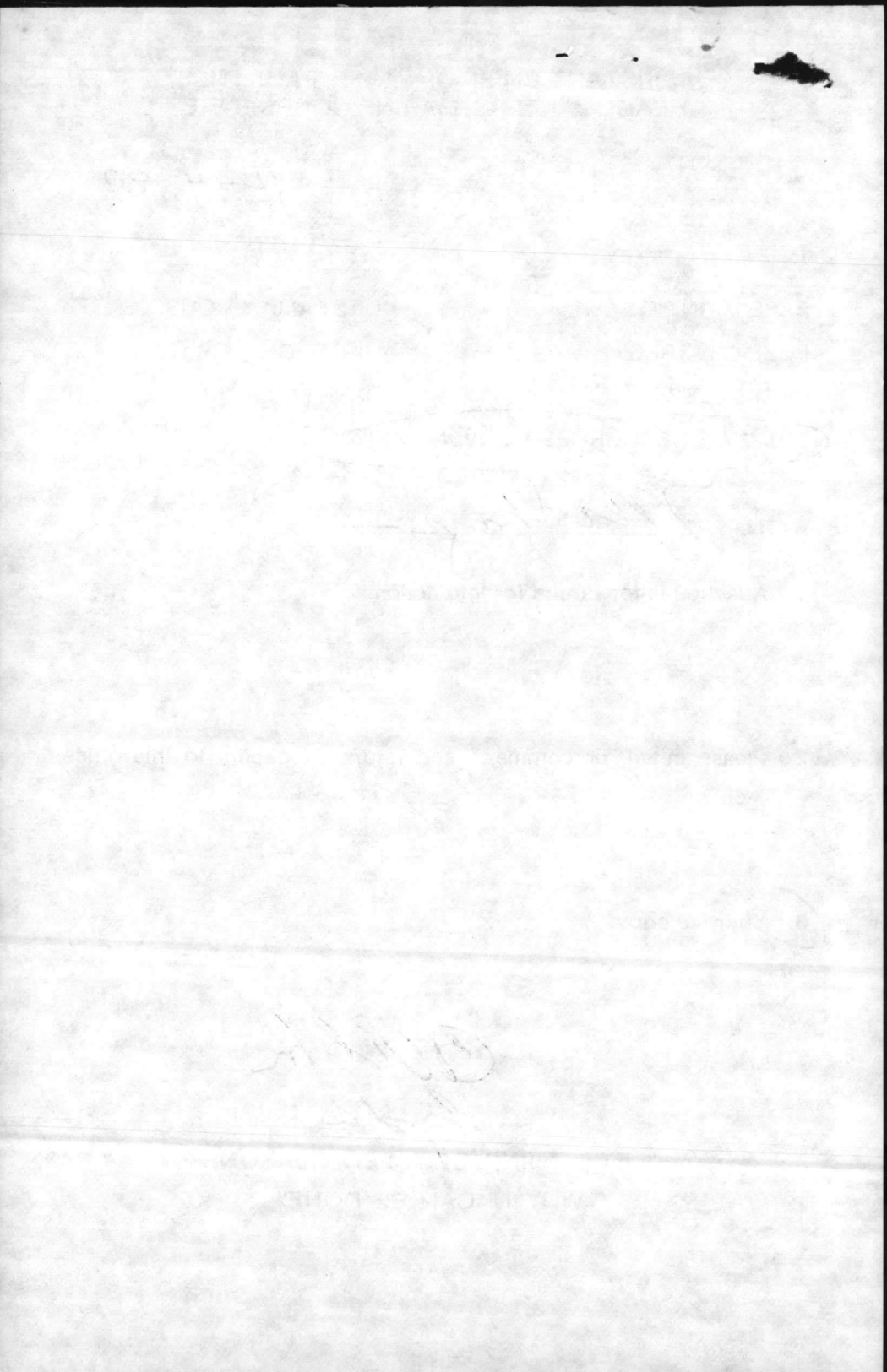
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2. Please initial, or comment, and return all papers to this office.
3. Your file copy.

*B. W. Sh...  
By dir*

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







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

Col Datzell. 4

*BUR*

IN REPLY REFER TO:  
6280  
GSO  
2 DEC 1987

From: Commanding Officer, Marine Corps Air Station, New River  
To: Commanding General, Marine Corps Base, Camp Lejeune,  
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b. Commanding officers, maintenance officers and HW disposal coordinators/officers received waste management training 17-19 November, and increased training and awareness will be emphasized at the shop levels.

c. An R-1 project has been submitted for this fiscal year to install concrete bermed pads and new 550-gallon waste oil tanks for each generating area. The tanks will have the capability of being locked and access controlled.

2. This Command shares your concern and efforts to prevent future contamination of waste oil are on-going. Point-of-contact for further information is Mary Wheat, extensions 6518 or 6686.

*B. D. Waddell*  
B. D. WADDELL



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DEC 1987

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*Jules* *Dan*  
ASSISTANT CHIEF OF STAFF, FACILITIES  
HEADQUARTERS, MARINE CORPS BASE

DATE 11-13-87

TO:

BASE MAINT O

DIR, FAMILY HOUSING

PUBLIC WORKS O

DIR, BACHELOR HOUSING

COMM-ELECT O

BASE FIRE CHIEF

DIR., NAT. RESOURCES & ENV. AFFAIRS

ATTN: *Mr. Shaper*

1. Attached is forwarded for info/action.

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

3. Your file copy.

*W. Elston*  
*By dir*

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

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

IN REPLY REFER TO:  
6280  
SJA41

12 NOV 1987

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

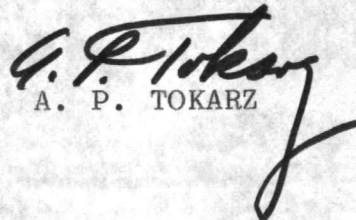
Subj: HAZARDOUS WASTE FUEL REPORT

Ref: (a) CG, MCB ltr 6280/2 Fac of 20Oct87

1. In accordance with the reference, this reports the action taken by this Office since 30 October 1987, the date of my last report:

a. 2 November 1987: In view of the approaching expiration date for the 90 day grace period (1 Dec 1987), called DRMO, Mrs. Nadine Hipp, to ascertain how much hazardous waste fuel had been removed thus far and how much remained. Mrs. Hipp reported that 188,269 gallons of hazardous waste fuel had been removed, and estimated that only 100,000 to 150,000 gallons remained. She reported that Waste Conversion, Inc., was scheduled to remove approximately 60,000 gallons from MCAS, New River during the week of 2-7 November. Additionally, Special Waste, Inc. had been contracted to remove the remainder of the waste fuel.

2. The progress in removing the hazardous waste fuel encourages me to believe the hazardous waste fuel will be removed before 1 December 1987. Nevertheless, I request that you keep this Office closely advised of the status of the hazardous waste fuel removal during the next three weeks in the event that the removal timetable slips and it becomes necessary to approach the State with an extension request.

  
A. P. TOKARZ



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WASTE INFORMATION DOCUMENT (WID)

Date: 18 May 1987

WID # \_\_\_\_\_

1. Generating Work Center Information

Metal Shop      SSgt Morrison      HMH 461      Hanger 504      6743  
Shop                      Contact                      Command                      Building                      Phone Ext.

2. Waste Identification

- a. Waste name: Common Methyl ethyl ketone  
Chemical(s) Methyl ethyl ketone 99.8%
- b. Physical form: (Check one)  Liquid     Solid     Sludge     Other (specify) \_\_\_\_\_
- c. Manufacturer: Forechem Co.                      NSN: 6810-00-~~281~~-~~2785~~
- d. Container: (type and size) 1 gal can
- e. Generation rate: (e.g., gal/day, lbs/day) 1/2 gal / month
- f. Frequency of generation: once a week
- g. Expected annual generation: (gals, lbs) 6 gal / yr
- h. Describe waste generation process: stripping a/c components of paint
- i. Has waste been mixed with any other material?     Yes     No    If yes, specify \_\_\_\_\_

3. Reason for disposal: (Check one)     Exceeded shelf life     Served intended purpose     Unused     Other (specify) \_\_\_\_\_

4. CERTIFICATION: I certify that the above named materials are the only compounds in the waste containers listed above and have not been mixed with any other materials.

M. Curcio  
HMDO Signature

18 May 87  
DATE

Appendix A to  
ENCLOSURE (1)

ASO 6280.1A  
18 MAR 1987

5. REQUEST FOR WASTE CHARACTERIZATION BY NREAD: I am unable to properly classify the above waste. NREAD assistance is requested. Cost of Laboratory Analysis should be charged to the following Cost Account Code: \_\_\_\_\_

\_\_\_\_\_  
HMDC Signature

\_\_\_\_\_  
DATE

TO BE COMPLETED BY THE HMDC AND COPIES SENT TO THE HMDO, DRMO, AND DIRECTOR, NREAD

6. Waste characterization: Date completed \_\_\_\_\_ Lab report # \_\_\_\_\_

7. Waste classification: \_\_\_\_\_ Hazardous \_\_\_\_\_ Nonhazardous

8. EPA Waste Number(s): \_\_\_\_\_

9. Reason for hazard classification: \_\_\_\_\_

10. Handling Instructions: \_\_\_\_\_

11. DTID 1348-1 required: \_\_\_ Yes \_\_\_ No

12. Container and labeling requirements

a. DOT/DOD container type: \_\_\_\_\_

b. DOT proper shipping name: \_\_\_\_\_

c. DOT hazard class: \_\_\_\_\_

d. UN/NA number: \_\_\_\_\_

e. Additional requirements: (for DRMO) \_\_\_\_\_

13. Special precautions and/or instructions: \_\_\_\_\_

\_\_\_\_\_  
HMDC Signature

\_\_\_\_\_  
Code

Appendix A to  
ENCLOSURE (1)

WASTE INFORMATION DOCUMENT (WID)

Date: 13 APRIL 87

WID # \_\_\_\_\_

1. Generating Work Center Information

METAL SHOP      GYSGT RIPOLIO      HMLA-269      AS4108      6915  
"Shop"                      Contact                      Command                      Building                      Phone Ext.

2. Waste Identification

a. Waste name: Common METHYL ETHYL KETONE  
Chemical(s) 2-BUTANONE; MEK; ETHYL METHYL KETONE  
METHYL ACETONE; BUTANONE-2

b. Physical form: (Check one)  Liquid     Solid     Sludge     Other (specify)

c. Manufacturer: PHIPPS PRODUCTS CORP      NSN: 6810002812762

d. Container: (type and size) METAL 5GAL CAN

e. Generation rate: (e.g., gal/day, lbs/day) LGT/DAY

f. Frequency of generation: DAILY

g. Expected annual generation: (gals, lbs) 60 GALS

h. Describe waste generation process: CLEANING PARTS, STRIPPING PAINT

i. Has waste been mixed with any other material?  Yes     No    If yes, specify PAINT AND GREASE

3. Reason for disposal: (Check one)  Exceeded shelf life     Served intended purpose     Unused     Other (specify) \_\_\_\_\_

4. CERTIFICATION: I certify that the above named materials are the only compounds in the waste containers listed above and have not been mixed with any other materials.

[Signature]      13 April 87  
HMDO Signature      DATE

Appendix A to  
ENCLOSURE (1)



ASO 6280.1A  
18 MAR 1987

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HMDC Signature

DATE

TO BE COMPLETED BY THE HMDC AND COPIES SENT TO THE HMDO, DRMO, AND DIRECTOR, NREAD

6. Waste characterization: Date completed \_\_\_\_\_ Lab report # \_\_\_\_\_

7. Waste classification: \_\_\_\_\_ Hazardous \_\_\_\_\_ Nonhazardous

8. EPA Waste Number(s): \_\_\_\_\_

9. Reason for hazard classification: \_\_\_\_\_

10. Handling Instructions: \_\_\_\_\_

11. DTID 1348-1 required: \_\_\_ Yes \_\_\_ No

12. Container and labeling requirements

a. DOT/DOD container type: \_\_\_\_\_

b. DOT proper shipping name: \_\_\_\_\_

c. DOT hazard class: \_\_\_\_\_

d. UN/NA number: \_\_\_\_\_

e. Additional requirements: (for DRMO) \_\_\_\_\_

13. Special precautions and/or instructions: \_\_\_\_\_

HMDC Signature

Code

Appendix A to  
ENCLOSURE (1)



EOB

# Memorandum

READ FILE

6240  
NREAD

DATE: 29 Dec 87

FROM: Supervisory Ecologist, NREAD

TO: All Soil, Water, and Environmental Branch Employees

SUBJECT: INTERIM GUIDANCE ON DEALING WITH HAZARDOUS WASTE AND WASTE OIL  
MANAGEMENT CRISIS

REFERENCE: (a) SWEB staff mtg involving D. Sharpe, E. Betz, S. Gwynn, J. Riggs,  
T. Barbee, K. Warren, and M. Martin of 28 Dec 87  
(b) BO 6240.5A

1. This memorandum, in follow up of reference (a), is directed at improving work planning and programming within the Soil, Water and Environmental Branch (SWEB). Without immediate action, the SWEB will soon be overwhelmed by the deluge of assignments and requests for assistance in the areas of hazardous waste (HW) management and the related collection and disposal of Waste Oil. I cannot overstate SWEB employees efforts during the past eighteen months to tackle these program deficiencies headon. It is unfortunate that other organizations such as AC/S, Logistics, Base Maintenance Division, Defense Reutilization and Marketing Officer, etc., have failed to make the major improvements in manpower and funding required to bring Camp Lejeune into compliance with state and federal regulations outlined in reference (b).

2. At this time, it appears that we have entered a period of non-compliance with HW regulations which will extend for several years unless there is a major change in attitudes of organizations generating HW and providing support for HW disposal. It is important that each SWEB employee learn how to deal with the mounting workload and associated stressful conditions. We must learn how to set proper priorities for all tasks.

3. Based on your comments during reference (a), I have modified my proposed assignments of responsibilities. Until further notice, the following guidance shall apply to the SWEB.

4. Mr. Tom Barbee shall continue to work under my direction and shall have day-to-day responsibility for:

a. Providing technical assistance to and handling routine problems associated with HW and used oil management (excluding emergency spill response) for MCAS, New River).

b. Directing day-to-day used oil management activities of the SWEB, particularly daily inspections of HW oil tanks and collection of waste oil;

c. Coordinating sampling and testing of waste oil by Supervisory Chemist;

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d. Maintaining used oil management records including, but not limited to, waste oil log, waste oil turn in documents, inspection records;

e. Coordination of contracts required to dispose of waste oil and cleaning of tanks;

f. Maintenance of waste oil storage facilities and handling equipment.

Mr. Barbee shall serve as point of contact with DRMO and Base Maintenance on used oil management. All SWEB employees will keep Mr. Barbee informed of significant events relative to used oil management. Mr. Barbee shall keep me informed, (Director, NREAD in my absence), of any major problems or issues which arise. Use of hand written memos is preferred.

5. Mr. Sam Gwynn shall have primary responsibility for oil and hazardous material spill response and for HW management by Base and Base tenant HW generators. Until further notice, the following employees shall work under Mr. Gwynn's direction:

- a. John Riggs
- b. Ken Warren
- c. Manuel Martin
- d. LCpl Alexis

Mr. Gwynn shall assign work and ensure proper scheduling and utilization of time by each employee. Assignments shall be consistent with each employees position description and the following:

a. Mr. Riggs shall be responsible for handling routine problems and providing technical assistance to 2D Marine Division, II MAF, 6th MAB, Naval Dental Clinic, and the Naval Hospital on HW management and used oil disposal and preparing annual reports required by HW regulations contained in reference (b) and Navy/ Marine Corps Regulations;

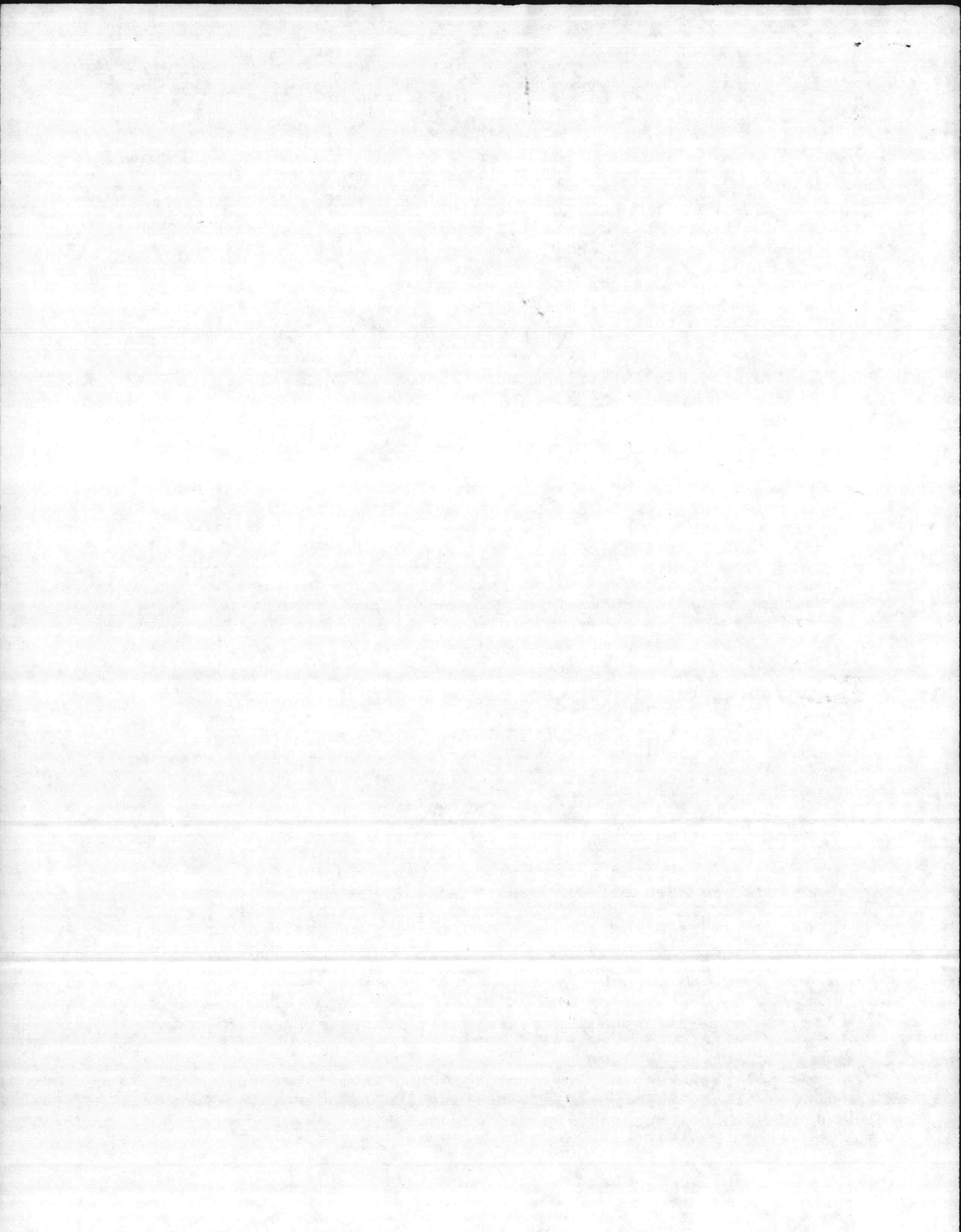
b. Mr. Warren shall handle routine oil and hazardous material spills as assigned and shall be responsible for handling routine problems and providing technical assistance to 2D FSSG on HW management and used oil disposal;

c. Mr. Martin shall handle routine oil and hazardous material spills as assigned and shall assist with day-to-day administrative tasks required to support HW and used oil generation and handling operations, and;

d. LCpl Alexis shall perform daily inspections of HW oil tanks.

Mr. Gwynn shall keep me, (Director, NREAD in my absence), informed of any major problems or issues arising related to HW disposal and emergency spill response. Mr. Gwynn shall endeavor to minimize involvement of myself or Mr. Barbee in







routine problems. Mr. Gwynn shall keep me informed of the status of work assignments. Hand written memos are preferred.

6. Ms. Elizabeth Betz shall have responsibility for assisting with the administrative, budget, finance, supply and other functions required to ensure that the SWEB runs efficiently and that support is available in a timely manner. The following areas of special emphasis shall be addressed:

a. Coordinate preparation and submittal of routine environmental reports to higher headquarters and state and federal regulatory agencies. Shall gather information and compile reports. Initiate action to computerize all routine reports;

b. Serve as SWEB point of contact on implementation of the Land Use Management System (LUMS) and ensure that the LUMS provides maximum support to the day-to-day operation of the SWEB;

c. Shall establish and maintain service contracts required to support the operation of the SWEB. Serve as liasion with Public Works, Purchasing and Contracting and LANTDIV on these contracts. Particular emphasis shall be placed in the near term to reducing the turn around time for analysis of HW, water and other media;

d. Shall ensure that the hazardous waste analysis plan is up to date and that all sampling, pretreatment and analysis are done in accordance with applicable criteria and standards, and;

e. Shall establish a computerized Hazardous Material Information System and supporting technical files and operational procedures to ensure maximum capability within applicable constraints to support the Base Fire Department on emergency spills and to support the day-to-day operation of the Hazardous Material/ Waste disposal program.

Ms. Betz shall maximize use of physical science technicians in the traditional water and waste water monitoring functions of the ECMS. Ms. Betz shall attempt to minimize the involvement of myself and Mr. Tom Barbee in the implementation of the Safe Drinking Water Act, NPDES permit, and public health protection related programs. Ms. Betz shall ensure that the Director, NREAD, is kept informed of the status of compliance and any significant events or issues related to these specific programs. Written memos, via Supervisory Ecologist, are preferred.

7. While the organization is certainly faced with some huge challenges, in reality, the actual effect is that each of you are being provided an opportunity for personal growth in a field which becomes more important each year. How you manage your time and how effectively you evaluate and solve the work or problems you are assigned are what I am interested in. You are encouraged to innovate. Become familiar with the MIP program and the Beneficial Suggestion Program.

*D.D. Sharpe*

D. D. SHARPE  
SUPERVISORY ECOLOGIST





*Betz complete copy discard other copies T-6*

DEPARTMENT OF THE NAVY

ATLANTIC DIVISION  
NAVAL FACILITIES ENGINEERING COMMAND  
NORFOLK, VIRGINIA 23511-6287

TELEPHONE NO.  
(804) 445-2932

IN REPLY REFER TO:  
5090  
1142DPC

09 NOV 1987

From: Commander, Atlantic Division, Naval Facilities Engineering Command

Subj: FUNDING FOR HAZARDOUS WASTE DISPOSAL IN FY-88

Encl: (1) NAVFACENGCOCOM 1tr 1121A of 7 Oct 87

1. Enclosure (1) which contains a Memorandum of Understanding between the Military Services and the Defense Logistics Agency for the subject funding, is forwarded for your information. FY-88 disposal funding will be similar to FY-87 with one notable exception. The costs for disposal of hazardous materials (HM) which survive the Reutilization, Transfer, Donation and Sales (RTD&S) cycle in FY-88 and beyond will be funded by the Defense Logistics Agency (DLA) once the items are accepted as HM by DLA. It is imperative, therefore, that turn-in documents accurately reflect whether an item is HM or HW.
2. Please note that the Navy's FY-88 disposal budget has been reduced approximately one-third from FY-87 funding levels. Therefore, you must continue to aggressively pursue your hazardous waste minimization efforts.
3. DLA plans to directly bill generators starting in FY-89 as outlined in enclosure (1). At large HM/HW generating activities, additional resources will be required to arrange and administer the billing procedures. Be advised of this change as it will directly impact disposal funding practices.
4. Our point of contact is Mr. Steve Olson, (804) 445-2935 or AUTOVON 565-2935.

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

Distribution:

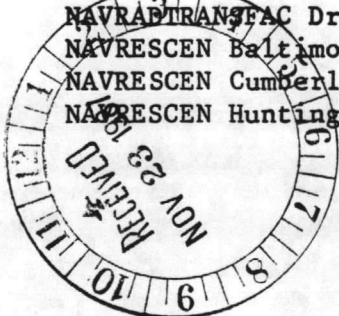
ABL Cumberland  
ADMINSUPU Bahrain  
AFXTRACTY Camp Peary  
FCTCLANT Dam Neck  
HPDTA Hertford  
INACTSHIPFAC Portsmouth  
LANTCOMOPSUPPFAC Norfolk  
MARCORB Camp Lejeune  
MARCORCRUITSTA Louisville  
MARCORCRUITSTA Richmond  
MARCORCRUITSTA South Charleston



Subj: FUNDING FOR HAZARDOUS WASTE DISPOSAL IN FY-88

Distribution Con't...

- MARCORESTRACEN Baltimore
- MARCORESTRACEN Lynchburg
- MARCORESTRACEN Richmond
- MARCORESTRACEN Roanoke
- MARCORESTRACEN South Charleston
- MCAS Cherry Point
- MCAS New River
- NAF Lajes
- NAF Mildenhall
- NAVAVNDEPOT Cherry Point
- NAVAVNDEPOT Norfolk
- NAS Bermuda
- NAS Guantanamo
- NAS Keflavik
- NAS Norfolk (2 cys)
- NAS Oceana
- NAS Sigonella
- NAVCAMS MED Naples
- NAVCOMMDDET Souda Bay
- NAVCOMMSTA Balboa
- NAVCOMMSTA Keflavik
- NAVCOMMSTA Nea Makri
- NAVCOMMSTA Roosevelt Roads
- NAVCOMMSTA Rota
- NAVCOMMSTA UK Thurso
- NAVCOMMU London
- NAVSUPPFAC Antigua
- NAVFAC Argentia
- NAVFAC Bermuda
- NAVFAC Brawdy
- NAVFAC Keflavik
- NAVHOSP Camp Lejeune
- NAVHOSP Portsmouth
- NAVMARCORESCEN Little Creek
- NAVMARCORESCEN Louisville
- NAVMARCORESCEN Newport News
- NAVMARCORESCEN Richmond
- NAVMARCORESCEN Roanoke
- NAVMARCORESCEN Wheeling
- NAVMEDRSCHU 3 Cairo
- NAVORDSTA Louisville
- NAVPHIBASE Little Creek
- NAVRADSTA R Sugar Grove
- NAVRADTRANSFAC Driver
- NAVRESCEN Baltimore
- NAVRESCEN Cumberland
- NAVRESCEN Huntington



Subj: FUNDING FOR HAZARDOUS WASTE DISPOSAL IN FY-88

NAVRESCEN Lexington  
NAVRESCEN Parkersburg  
NAVRESCEN South Charleston  
NAVRESCEN Staunton  
NAVSECGRUACT Athens  
NAVSECGRUACT Augsburg  
NAVSECGRUACT Edzell  
NAVSECGRUACT Galeta  
NAVSECGRUACT Guantanamo

NAVSECGRUACT Keflavik  
NAVSECGRUACT London  
NAVSECGRUACT Naples  
NAVSECGRUACT Northwest  
NAVSECGRUACT Sabana Seca  
NAVSECGRUACT San Vito Del  
NAVSECGRUACT Terceira Island  
NAVSHIPYD Norfolk  
NAVSTA Guantanamo  
NAVSTA Norfolk  
NAVSTA Panama Canal  
NAVSTA Roosevelt Roads  
NAVSTA Rota  
NAVSUPPACT Holy Loch  
NAVSUPPACT Naples  
NAVSUPPACT Souda Bay  
NAVSUPPO La Maddalena  
NAVWPNSFAC DET Machrihanish  
NAVWPNSFAC St. Mawgan  
WPNSTA Yorktown  
NSC Norfolk Cheatham Annex  
NSC Norfolk  
OICC MED RESCEN Louisville  
PWC Norfolk  
SUPSHIP Newport News  
SUPSHIP Portsmouth

Copy to:  
CNO (OP-45)  
CINCLANTFLT  
CINCUSNAVEUR  
CMC  
CNET  
CHNAVPERS  
COMFAIRCARIB  
COMFAIRMED Naples  
COMICEDEFOR  
COMNAVACTUK London

Subj: FUNDING FOR HAZARDOUS WASTE DISPOSAL IN FY-88

COMNAVAILANT  
COMNAVAISSYSCOM  
COMNAVBASE Guantanamo  
COMNAVBASE Norfolk  
COMNAVFACECOM  
COMNAVFORCARIB Puerto Rico  
COMNAVOCEANSYSLANT  
COMNAVSEASYSYSCOM  
COMNAVSECGRUCOM  
COMSUBLANT  
COMNAVSUPSYSCOM  
COMNAVSURFLANT  
COMNAVTELCOM  
COMTRALANT  
LANTNAVFACENGCOMBRO Naples  
NAVCAMS LANT Norfolk  
NAVMEDCOM  
NAVMEDCOMMIDLANTREG  
NAVSAFCEN Norfolk  
NEESA  
NAVENVIRHLTHCEN Norfolk  
NSC Norfolk (Craney Island Fuel Terminal)





DEPARTMENT OF THE NAVY

NAVAL FACILITIES ENGINEERING COMMAND

200 STOVALL STREET

ALEXANDRIA, VA 22332

1142  
5090

1121A

07 OCT 1987

From: Commander, Naval Facilities Engineering Command

Subj: FUNDING FOR HAZARDOUS WASTE DISPOSAL IN FY88

Encl: (1) Memorandum of Understanding between the Military Services and the Defense Logistics Agency for Fiscal Year (FY) 1988

1. In FY88, disposal funding will be similar to FY87. Navy will send funds to the Defense Reutilization and Marketing Service (DRMS). These funds will be used to pay for disposal of Navy/Marine Corps hazardous wastes (HW) just like FY87 with one notable exception. The Defense Logistics Agency (DLA) will fund the disposal cost of any hazardous materials (HM) accepted by DLA from the Services which survive the RTD&S cycle. Therefore, we should ensure that the turn-in document accurately reflects whether an item is a HM or HW.
2. Funding will be tight in FY88. The Navy's total FY87 hazardous waste disposal bill was \$30.95M. In addition, there was a \$2.8M backlog on DLA's books as we started FY88. The FY88 budget has \$22.261M for hazardous waste disposal. We are working to resolve this apparent shortfall. In the meantime, we need to continue to stress hazardous waste minimization.
3. Enclosure (1) contains a Memorandum of Understanding that the Services have signed, outlining responsibilities for both parties. DLA has indicated that they will be able to directly bill generators starting in FY89. When this occurs a direct incentive for hazardous waste minimization will exist. The days of free disposal are over. You should start informing your activities of this pending change.
4. We will be working with DLA/DRMS to ensure the transition from central funding to activity funding occurs as smoothly as possible. We are also discussing the budget base transfer of the hazardous waste disposal funds into the individual activity budgets for FY89. If you have any questions on this subject, please contact Mr. Ted Zagrobely, NAVFACENGCOM 1121A, at Autovon 221-8176.

*David L. Olson*

D. L. OLSON

By direction

Distribution:

COMPACNAVFACENGCOM

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CO CHESNAVFACENGCOM

5090  
1121A

07 OCT 1987

Subj: FUNDING FOR HAZARDOUS WASTE DISPOSAL IN FY88

Copy to:

CNO (OP-45)

CINCPACFLT

CINCLANTFLT

CINCUSNAVEUR

CNR ARLINGTON

CNAVRES NEW ORLEANS

CNET PENSACOLA

NAVCOMPT

COMNAVMECOM

COMNAVHILPERSCOM

COMNAVOCEANCOM

COMNAVSECGRU

COMNAVTELCOM

COMNAVINTCOM

COMNAVSEASYSKOM

COMNAVAIRSYSKOM

COMNAVSUPSYSKOM

COMNAVSPAWARYSKOM

CO NEESA (112H)

DLA

DRMS Battle Creek

MEMORANDUM OF UNDERSTANDING  
BETWEEN THE MILITARY SERVICES  
AND  
THE DEFENSE LOGISTICS AGENCY

This agreement provides for the funding for disposal of hazardous material/hazardous waste (HM/HW) between the Military Services and the Defense Logistics Agency (DLA) for FY 88.

I. References:

a. Office of the Assistant Secretary of Defense (Acquisition and Logistics) memorandum of 29 May 1986, subject: Policy for Funding Hazardous Waste (HW) Disposal Operations in FY 88 and Out Years (Enclosure 1).

b. Defense Utilization and Disposal Manual, DoD 4160.2i-M, Chapter XXI, Hazardous Property Management (Enclosure 2).

II. Background: The Federal Resource Conservation and Recovery Act (RCRA) requires the total management of hazardous waste to include a tracking system from its point of generation to ultimate disposal. In accordance with reference 1 a, the Military Services will fund for hazardous waste disposal, and DLA will continue to provide disposal services for Department of Defense generated hazardous waste.

Hazardous property will be managed as outlined in reference 1 b.

III. Definitions:

Hazardous property, HM, and HW are defined in reference 1 b.

IV. Purpose: To identify procedures for the Military Services to provide funding for HW disposal actions by DLA in accordance with reference 1 a.

V. The Military Services will:

a. Turn in hazardous property in accordance with reference 1 b.

b. Provide DLA reimbursable Military Interdepartmental Purchase Requests (MIPRs) at the Service departmental level (Category I) for FY 88 HW disposal requirements subject to apportionment funding limitation by 25 September 1987.



The MIPR is to be sent to the following address:

Defense Reutilization and Marketing Service  
Office of the Comptroller (DRMS-C)  
Federal Center  
74 North Washington Street  
Battle Creek, Michigan 49017-3092

c. Provide funds for OCONUS retrograde expenses to include packaging, crating, and handling when they are required to be performed by commercial sources or an industrial funded activity and transportation to DLA-designated site. If a Service does not provide a separate transportation fund cite, the charges will be billed against the MIPR. The decision to retrograde or dispose in country will be a joint DLA/Services decision.

d. Ensure that generating activities provide servicing Defense Reutilization and Marketing Offices (DRMOs) with generations data for hazardous material/waste and any other appropriate information to allow for hazardous waste disposal contract development. Servicing DRMOs will periodically request such information from generating activities. Generating activities will advise the servicing DRMO of significant changes in quantities and compositions of hazardous material/waste generations as soon as such changes are known.

VI. DLA will:

a. Contract for the disposal of hazardous waste for the Military Services. The Department of Defense Activity Address Code (DoDAAC)/Unit Identification Code (UIC), as provided by the generating activity on the DD1348-1, Disposal Turn-in Document (DTID), will be used to bill the parent military service for the disposal cost of the hazardous waste identified in the DTID.

b. Establish an automated accounting system to provide accounting and billing of disposal costs by type and quantity according to DoDAAC/UIC during FY 88 for implementation in FY 89.

c. Provide for the disposal of HM/HW designated as the responsibility of the Military Services for disposal (reference 1 b) in those specific cases where DLA and the Services concur. In those cases, specific funding for such disposal will be confirmed by official correspondence (message/letter).

d. Provide to installation commanders copies of RCRA hazardous waste manifests for the transportation of HW. Signed copies of RCRA HW manifests from the designated TSD facilities receiving the wastes shall also be provided to installation commanders.



DEFENSE LOGISTICS AGENCY

HEADQUARTERS  
CAMERON STATION  
ALEXANDRIA, VIRGINIA 22304-6100

IN REPLY  
REFER TO

3PDSO

29 SEP 1987

MEMORANDUM FOR DEPUTY FOR ENVIRONMENT, SAFETY AND OCCUPATIONAL HEALTH,  
OASA (I&L)  
DEPUTY DIRECTOR FOR ENVIRONMENT, OASN (S&L)  
DEPUTY FOR ENVIRONMENT, SAFETY AND OCCUPATIONAL HEALTH  
(SAF/MIQ)

SUBJECT: Memorandum of Understanding (MOU) between the Military  
Services and Defense Logistics Agency (DLA) for Funding of  
the Disposal of Hazardous Materials/Hazardous Waste (HM/HW)  
in Fiscal Year (FY) 1988

By memorandum of 29 May 1986, the Director, Environmental Policy, Office  
of the Assistant Secretary of Defense (Acquisition and Logistics),  
provided policy for financing the disposal of HM/HW in FY 1988 and out  
years. A copy of the signed MOU, which was jointly developed and  
identifies respective responsibilities relative to this policy, is  
enclosed.

The MOU provides that DLA will establish an automated system to account  
and bill for disposal costs for implementation in FY 1989. Towards this  
end, DLA will host meeting for the joint DLA/Military Services'  
development of accounting and fiscal system procedures. We solicit the  
participation of your representatives. The DLA point of contact is  
Walker Beddoes (202) 274-7503.

FOR THE DIRECTOR:

1 Encl

cc:  
DASD (E)  
DLA-C  
DLA-WS (DEPO)  
DLA-LS  
DRMS-D/C/H/P  
NAVSUP-0322  
NAVFAC-1121 ←  
AF/LEEV  
AFLC-MMLII  
USMC (LMM-2)  
DALO-SMP-U  
DAEN-ZCE

RICHARD G. BRUNER  
Executive Director  
Technical & Logistics Services





e. Fund for the sampling, analysis, and spill cleanup (including CONUS and OCONUS spills en route) of HM/HW for which DLA is responsible.

f. Maintain records as needed to ensure that contract awards do not exceed funds available on individual MIPRs.

g. Disburse the Military Departments funds on a quarterly basis, SF 1080 billings, for hazardous waste disposal costs. An advanced copy of the processed disbursement voucher will be provided to the Military Departments.

h. Provide each Service with monthly summary disposal costs.

i. Provide the Services within 30 days of the end of the fiscal year funds available for withdrawal.

j. Provide the Services with FY 88 annual funding requirements. Provide the Services advance notification for additional funds, when required.

k. Fund for the cost of administering the HM/HW disposal program except as specified in paragraph V above.

l. Fund for the disposal costs of HM accepted by DLA from the Services.

m. Return 100 percent of the proceeds from recyclable material that is sold through DRMS to DoD components with qualifying recycling programs in accordance with DLA's implementation of the Department of Defense Sale of Recyclable Materials Program dated 10 Nov 1983.

VII. Existing agreements between DLA and the Military Services for the disposal of HM/HW generated overseas will continue in effect.

2 Encl

1. OASD(A&L) memo  
29 May 1986
2. CHAPTER XXI  
DoD 4160.21-M

ARMY Lewis D. Walker D/R 204  
OASD(A&L), 9/128/87

DLA Richard G. Bruner

RICHARD G. BRUNER  
Executive Director  
Technical & Logistics Services

23 SEP 1987

NAVY Carl R. Welch Room 8000 9/24/87

AIR FORCE Gary S. Flora

GARY S. FLORA  
Associate Director  
Directorate of Engineering & Services  
24 SEP 1987





THE OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

WASHINGTON DC 20301 8300

ACQUISITION AND  
LOGISTICS

MAY 29 1985

I/EP

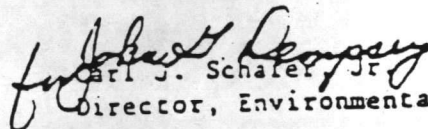
MEMORANDUM FOR DEPUTY FOR ENVIRONMENT, SAFETY AND OCCUPATIONAL  
HEALTH, OASA (I&L)  
DEPUTY DIRECTOR FOR ENVIRONMENT, OASN (S&L)  
DEPUTY FOR ENVIRONMENT, SAFETY AND OCCUPATIONAL  
HEALTH (SAF/MIQ)  
DIRECTOR, DEFENSE LOGISTICS AGENCY

SUBJECT: Policy For Funding Hazardous Waste (HW) Disposal Operations in FY88  
and Out years

Components will budget for HW disposal operations in O&M accounts. DLA will provide disposal services. The Military Services and DLA should plan on a mutually acceptable method of financing. Components will fund for retrogrades necessary for the disposal of hazardous waste.

DLA is requested to implement a system for direct accounting of disposal costs. DLA will provide Components with quarterly reports of funds obligated within 45 days after end of the quarter.

DLA will budget for cost of disposal of excess hazardous materials which survive RDT&S accepted by DLA from Components.

  
Carl J. Schafel, Jr.  
Director, Environmental Policy





## CHAPTER XXI

## HAZARDOUS PROPERTY MANAGEMENT

## A. GENERAL

1. The purpose of this chapter is to provide DoD installations and DLA personnel with guidance for handling, processing, and disposing of hazardous property, in accordance with applicable environmental and other pertinent laws and regulations.

2. The DoD policy is to store and dispose of all hazardous property in an environmentally acceptable manner in accordance with applicable environmental and other pertinent laws and regulations.

3. For definitions see Attachment 1 and Chapter III, this manual.

## B. RESPONSIBILITIES

1. DoD installation responsibilities are as follows:

a. Where feasible, minimize quantities of hazardous property through resource recovery, recycling, source separation, and acquisition policies.

b. Provide available technical and analytical assistance, including research and development support, to DLA to accomplish disposal, if requested.

c. Provide all available information to DLA, as required, to complete environmental documentation; e.g., environmental impact statements associated with disposal.

d. Properly identify, package, label and certify conformance with established environmental and transportation criteria prior to transfer of accountability for hazardous property to DLA.

e. When requested, assist DLA by providing information and comments on federal, state, regional, and local regulations being developed to control hazardous property disposal; e.g., ability of particular installation to comply and impact on DoD. Alert DLA to any local situation which could impact hazardous property disposal.

f. Retain physical custody of hazardous property within the guideline provided in paragraph C, this chapter.

g. Provide for disposal of the following categories of hazardous property:

(1) Toxicological, biological, radiological, and lethal chemical warfare materials which, by U.S. law, must be destroyed. Disposal of the by-products of such

material is the responsibility of the DoD installation with assistance from DLA.

(2) Material which cannot be disposed of in its present form due to military regulations; e.g., Ammunition, Explosives and Dangerous Articles (AEDA), controlled medical items. This category would include those instances where military regulations require the obliteration of all markings that could relate an excess material to its operational program. Once the appropriate actions are taken to meet the military regulation, the resulting material could then be turned in to the servicing DPDO.

(3) Municipal-type garbage, trash, and refuse resulting from residential, institutional, commercial, agricultural, and community activities, which can be disposed of in a state or locally permitted sanitary landfill.

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

(5) Sludges resulting from municipal-type waste-water treatment facilities.

(6) Sludges and residues generated as a result of industrial plant processes or operations. Properly identified industrial process sludges and residues which are not commingled or a product of an industrial waste treatment facility are the responsibility of DLA. DLA does not take sludges and residues from waste water treatment facilities. DLA does take sludges and residues from industrial processes that have not been commingled. For example, sludges and residues from industrial process "A" must be collected and stored separately from sludges and residues resulting from industrial process "B". Each process may result in sludges and residues that contain a mixture of ingredients and contaminants but the sludges and residues from each process must be collected and stored separately and not commingled.

(7) Refuse and other discarded material which result from mining, dredging, construction, and demolition operations.

(8) Unique wastes and residues of a nonrecurring nature which research and development experimental programs generate.

2. The DLA responsibilities are as follows:

a. Accomplish documentation (including records) for DLA disposal actions as required under applicable

environmental and other pertinent laws and regulations.

b. Initiate contracts or agreements for DLA disposal actions.

c. Accept accountability for all hazardous property, except those categories under responsibility of DoD installations (paragraph B1 above) which have been properly identified, packaged, labeled, and certified in accordance with environmental and transportation laws and regulations.

d. Accept sludges and residues from industrial processes that have not been commingled, e.g., sludges and residues from industrial process "A" must be collected and stored separately from sludges and residue resulting from industrial process "B".

e. Accept custody of hazardous property within the guidelines provided in paragraph C, this chapter.

f. Program for construction of storage facilities in support of the DLA disposal mission.

g. Provide any required repackaging or handling of hazardous property subsequent to acceptance of accountability from the turn-in activity.

h. Establish an inventory control system for the types, quantities, and locations of available hazardous property for which DLA is responsible in the event that some other activity might be able to use particular property as a resource.

i. Provide an economic incentive for DoD installations to segregate and minimize waste generation by:

(1) Providing feedback to military departments and defense agencies on the costs associated with destruction of HW.

(2) Providing 100 percent reimbursement to DoD installations with qualified recycling programs for hazardous wastes sold by DLA for recycling in accordance with DoD policy.

j. Contract for disposal technology not available within the DoD.

k. Minimize environmental risks and costs associated with the extended care, handling, and storage of hazardous property by accomplishing disposal within a significantly compressed disposal cycle. Initiate actions and projects within DoD and in conjunction with federal, state and local agencies and industry to realize this objective and expedite final disposal.

l. Operate a system to ensure that sufficient disposal capability is programmed to preclude extended delays in the hazardous property disposal process.

m. Maintain an analysis and information distribution capability of current technological advances on DoD hazardous property disposal procedures and advise DoD installations of such developments on a continuing basis. Additionally, ensure that DoD installations are apprised of any federal, state, regional, and local regulations being developed to control hazardous property disposal.

n. Serve as the DoD focal point to recommend to OASD matters of policy and guidance for hazardous property disposal.

o. Establish procedures relative to assigned responsibility for hazardous property disposal. Unresolved issues will be forwarded to OASD with appropriate comments.

### C. RESERVED

### D. TURN-IN PROCEDURES (GENERAL)

DoD installations and DLA are responsible for compliance with environmental and other pertinent laws and regulations. In order to ensure environmental compliance turn-in activities and DPDOs will:

1. Preplan, schedule, and coordinate hazardous property turn-ins.

2. Process turn-ins of hazardous property as follows:

#### a. Identification

(1) NSN-identified hazardous property.

(a) The turn-in activity will provide the following upon turn-in of NSN-identified hazardous property to the DPDO:

1. Valid NSN.

2. Noun name as cataloged in the supply system.

3. Chemical name of hazardous contaminants and noun name of nonhazardous contaminants.

4. Amount of hazardous and nonhazardous contaminants based on user's knowledge or testing of the item expressed in a range of content by percentage or parts per million as applicable.

(b) When necessary, the DPDO will:

1. Search HMIS and/or other data sources for chemical names of hazardous components.

2. Search HMIS for transportation and other data as required.

3. Contact manufacturer for data as required.



## (2) LSN/FSC-identified property.

(a) The turn-in activity will provide the following for turn-in of hazardous property to the DPDO:

1. Chemical name of hazardous components.
2. Chemical name of hazardous contaminants and noun name of nonhazardous contaminants.
3. Amounts of hazardous and nonhazardous contaminants based on user's knowledge or testing of the item expressed in a range of content by percentage or parts per million as applicable.

## (b) The DPDO will:

1. Accept accountability of property identified in the above manner.
2. Accept physical custody in accordance with paragraph C, this chapter.
3. Assign proper DoT shipping description to item received from on-site or for property that is received in-place and is not transported over public highways.
4. Assist turn-in activity in determining proper identification as capabilities permit.
5. Reject turn-in when proper identification in accordance with the above is not provided.

(3) PCBs. An analysis of PCB concentration as determined by a scientifically acceptable analytical method will accompany the DTID unless the property has a manufacturer's label or nameplate that indicates the presence of PCBs; e.g., generic or commercial name. The analysis will indicate the amount of PCB in parts per million (ppm) or in the following ranges:

- a. Less than 50 ppm
- b. 50-499 ppm
- c. 500 ppm or more

Individual analysis is required for each item. Items such as capacitors which do not have sampling or servicing parts and are sealed by the manufacturer and are suspected to contain PCBs will be turned in as PCB items (500 ppm and over) without analysis. DPDS may accept batch testing results of mineral oil dielectric on a case-by-case basis. However, approval for batch testing will be obtained from DPDS prior to turn-in.

## b. Packaging.

(1) Property turned in to the DPDO must be in containers that are non-leaking and safe to handle.

The containers must be able to withstand normal handling or the turn-in will be rejected.

(2) DoT specified containers are required for storage and movement of hazardous wastes. These wastes may also be accumulated in bulk in RCRA permitted facilities.

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

(4) When hazardous property turned in for disposal is packaged in the original military containers, the turn-in activity will provide the DPDO with a certification as to the true condition/reliability of the containers. The certification will be placed in Block Y of the DTID by the turn-in activity and will contain one of the following statements:

(a) Packaged in accordance with DoT 49 CFR 170-189.

(b) Packaging equals/exceeds DoT 49 CFR 170-189.

(c) Packaging is substandard to DoT 49 CFR 170-189 (this is not acceptable for hazardous waste "HW" or off-site hazardous property turn-ins).

(5) DoD property in foreign countries or territories shall be packaged in accordance with the host country's environmental laws and/or status of forces agreements.

## c. Labeling.

(1) Hazardous property will be labeled in conformance with established environmental and transportation laws and regulations.

(2) PCB marking requirements are as prescribed by the EPA in 40 CFR 761.45. Items containing 50 ppm or more PCB must be marked, with the exception of transformers. Only PCB transformers, i.e., 500 ppm or more PCB, must be marked.

## d. Disposal Turn-In Document (DTID).

(1) All property turned in to the DPDO will be done so with a properly prepared DTID. Standard procedures for preparation of a DTID are found in DoD 4140.17-M MILSTRIP. In addition, insert "HM" in block C if turn-in is hazardous material or "HW" if hazardous waste.

(2) The DTID will be modified to satisfy internal DoD auditing requirements. Where they exist, State/EPA required shipping manifests will be used in addition to the modified DTID for transporting haz-

ardous wastes. Information required on the State/EPA manifest must be completed by the turn-in activity when transporting hazardous wastes off-site and over public highways to a servicing DPDO.

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

(b) Block B—"Ship To": add telephone number and EPA identification number.

(c) Block U—"Freight Classification Nomenclature": add Hazard Class (maximum 18 alpha characters) and six character (2 alpha, 4 numeric) identification number as shown in DoT 49 CFR 172.

(d) Blocks W-X.

1. For non-NSN hazardous waste items enter the word 'waste' and the item's proper shipping name as shown in DoT 49 CFR 172 and as much descriptive information as possible in Blocks W and X, and/or attach additional documentation with this data.

2. For NSN hazardous waste items Block W will be used for internal purposes and Block X must contain the word "waste" followed by the item's proper shipping name as shown in DoT 49 CFR 172.

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

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

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

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

(i) Block-2. Enter DoT container classification.

(j) Block-3. Enter total quantity of hazardous waste by units of weight or volume (includes packaging).

(3) Block 8 of the DTID will be signed and dated by the DPDO and returned to the turn-in activity within 5 working days from receipt. The signed copy of the DTID will serve as valid receipt of accountability for the hazardous property by the DPDO.

#### E. TURN-IN PROCEDURES (SPECIFIC).

Detailed guidance governing turn-in as well as handling and processing of specific hazardous property is contained in Chapter VI, this manual.

#### F. IMPLEMENTATION OF RCRA.

##### 1. Permits.

a. The installation commander is responsible to ensure compliance with all RCRA requirements for the installation. The installation commander is also responsible to notify, to apply for permits, and to report to EPA or the state, as required, for all installation activities, including tenants. Tenants are responsible for conducting their activities in accordance with RCRA and permit requirements at the facility. Tenants will provide necessary documentation, signed and completed, to the host for permit applications and for reports as required by EPA or the state. Submittals will be in the format required by the regulatory agencies.

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

c. The installation commander will sign as the owner and the Defense Property Disposal Region Commander will sign as the operator.

##### 2. Hazardous Waste Management Plan.

Implementation of the comprehensive hazardous waste management program, mandated by RCRA, requires maximum cooperation of all activities on an installation. The following guidance applies to development and implementation of a Hazardous Waste Management Plan:

a. The installation commander is responsible for developing and implementing a Hazardous Waste Management Plan to include all tenants on the in-



stallation. This plan shall identify and implement hazardous waste management actions required by RCRA. Tenants are responsible for providing input to the installation commander for their portion of the plan.

b. All tenants will comply with applicable portions of the Hazardous Waste Management Plan and ensure that internal operational procedures are consistent.

c. Reserved.

d. Reserved.

e. Reserved.

### 3. Manifesting.

When required by EPA and/or State RCRA derived regulations, a manifest will be prepared in addition to the modified DTID in accordance with paragraph D2d(2) above. The permit holder (installation commander) has primary responsibility for signing manifests, but may delegate signature authority. However, the DPDO will co-sign all manifests for shipments of hazardous property on DLA accountable records. In those instances where the permit holder delegates signature authority to the DPDO, only one signature will appear.

### 4. Record Keeping and Reporting.

Installations shall comply with federal and state hazardous waste record keeping and reporting requirements. Tenants shall submit reports required by the installation's Hazardous Waste Management Plan within time frames established by the installation commander. All reports to EPA or the state will be prepared in proper format by the operators and co-signed and submitted by the installation commander.

## G. HAZARDOUS MATERIALS INFORMATION SYSTEM (HMIS)/HAZARDOUS MATERIALS TECHNICAL CENTER (HMTC)

1. DoD Instruction 6050.5, Hazardous Material Information System, assigns responsibilities for the establishment and use of a DoD hazardous material information system.

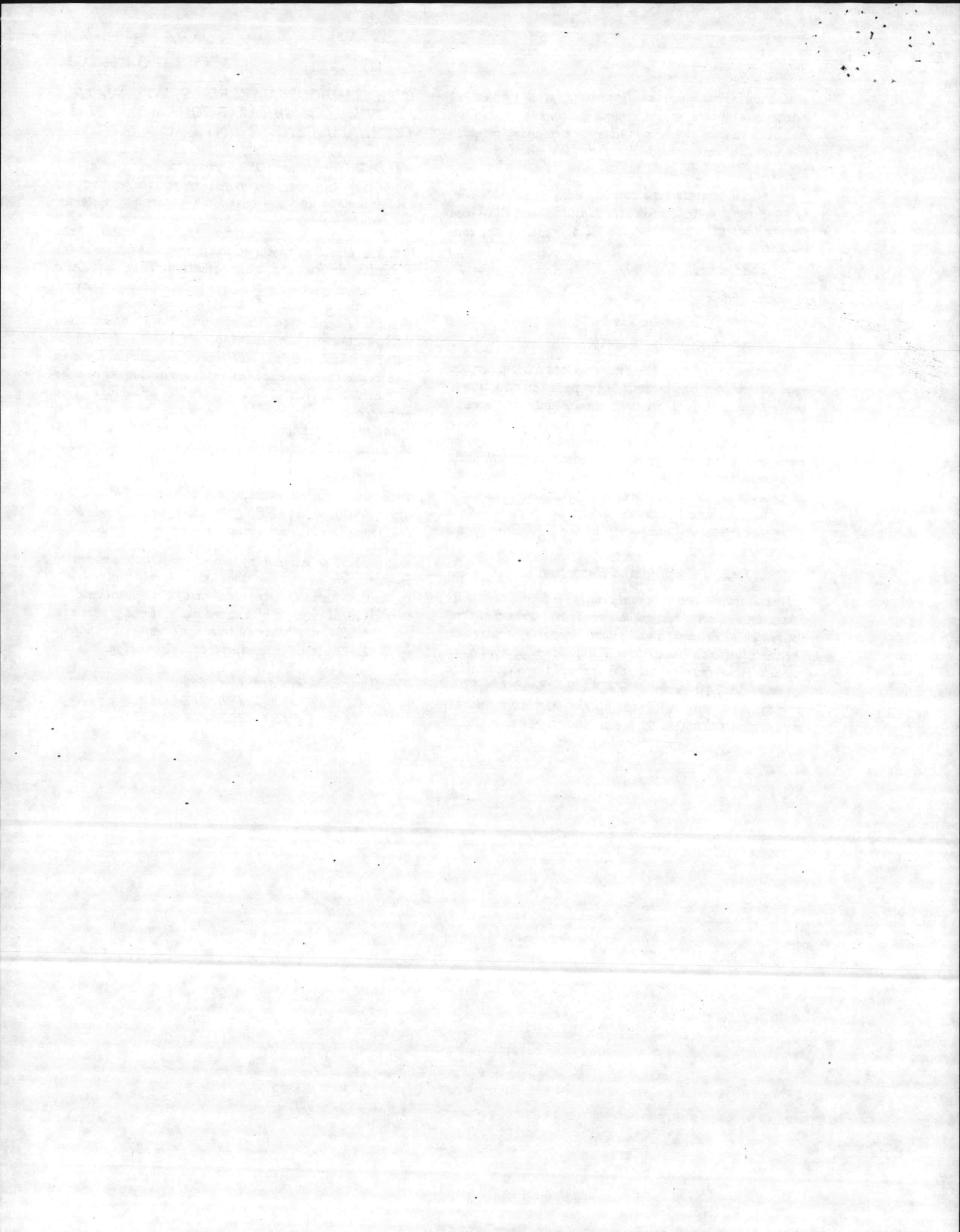
2. The HMIS is designed to support the major areas of health, safety, and transportation. This includes a wide range of data related to safety, health, transportation, and disposal of hazardous materials. Caution should be exercised in applying this information without the proper training and knowledge of procedures which are related to specific hazards. Data in this system is reference information and must be used in conjunction with, not in lieu of, procedures and regulatory documents. If there is any doubt about use of the safety and health information in the microfiche, the local health and safety staff should be contacted.

3. HMIS data are published on microfiche annually with quarterly cumulative updates. Items on the list are identified by NSN, Manufacturer, and Part Number (Trade Name) and are sequenced by NIIN.

4. HMTC is a DLA managed, contractor operated information source for technical information on safety, health, handling, transportation, disposal and environmental aspects of hazardous materials management. HMTC maintains a telephone response capability for DoD use in accessing this information.

Telephone numbers are: (800) 638-8958  
(301) 468-8858  
FTS (202) 468-8858





## CHAPTER XXI

## ATTACHMENT 1

## DEFINITIONS

1. *Hazardous Property*. Includes material and waste having one or more of the following characteristics:

a. has a flashpoint below 200° F (93° C) closed cup, or is subject to spontaneous heating or is subject to polymerization with release of large amounts of energy when handled, stored, and shipped without adequate control;

b. has a Threshold Limit Value<sup>k</sup> equal to or below 1,000 ppm for gases and vapors, below 500 mg/m<sup>3</sup> for fumes, and equal to or less than 30 mppcf or 10 mg/m<sup>3</sup> for dusts (less than or equal to 2.0 fibers/cc greater than 5 micrometers in length for fibrous materials);

c. a single oral dose that will cause 50 percent fatalities to test animals when administered in doses of less than 500 mg per kilogram of test animal weight;

d. is a flammable solid as defined in DoT 49 CFR 173.150, or is an oxidizer as defined in DoT 49 CFR 173.151, or is a strong oxidizing or reducing agent with a half cell potential in acid solution of greater than ± 1.0 volt as specified in Latimer's table on the oxidation-reduction potential;

e. causes first-degree burns to skin in short-time exposure, or is systemically toxic by skin contact;

f. in the course of normal operations, may produce

dust, gases, fumes, vapors, mists, or smoke with one or more of the above characteristics;

g. produces sensitizing or irritating effects;

h. is radioactive;

i. the item has special characteristics which in the opinion of the manufacturer could cause harm to personnel if used or stored improperly;

j. the item is hazardous in accordance with OSHA 29 CFR 1910;

k. the item is hazardous in accordance with DoT 49 CFR 171-179 or the International Maritime Dangerous Goods Code of the International Maritime Organization (IMO) or the Dangerous Goods Regulations of the International Air Transport Association (IATA); or

1. is regulated by the Environmental Protection Agency under 40 CFR.

2. *Hazardous Wastes*. Property which is regulated as a hazardous waste under the Resource Conservation and Recovery Act and subsequent legislation, including state and local regulatory authorities.

3. *Hazardous Material*. Any hazardous property which is not a hazardous waste.



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