Dave

ASSISTANT CHIEF OF STAFF, FACILITIES
HEADQUARTERS, MARINE CORPS BASE

DATE 2 Nov 87

TO:

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

ATTN: _____

1. Attached is forwarded for info/action.

Retain for Files

T. J. D

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"

MCBCL 5216/21 (REV. 6-83)

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

IN REPLY REFER TO:
6240
NREAD
14 Oct 87

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

Subj: DISPOSAL OF WASTE OIL

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

Encl: (1) Log of NREAD Waste Oil Management Activity

1. The enclosure is provided per the reference.

J. I. Wooten
J. I. WOOTEN

WASTE OIL MANAGEMENT ACTIVITY LOG

4 Sep 87

1. NREAD officials participated in a meeting at Raleigh regarding the Used Oil in tank S-781 at Building 45. The Hazardous Waste Compliance Order was discussed during which NREAD officials were advised that the Used Oil was a hazardous waste. The state agreed to allow Camp Lejeune to store the HW oil for 90 days from actual discovery (1 Sep 87). This date was based upon the receipt of laboratory data from JTC Environmental Consultants, Inc., to the Supervisory Chemist showing the content of freon in the used oil.

2. Glenée Smith, NREAD consulted with Steve Olson, Atlantic Division Naval Facilities Engineering Command, about inspection requirements for hazardous waste stored in tanks. Mr. Olson advised Ms. Smith to refer to the provision for tanks in 40 CFR, Subpart J.

8 Sep 87

Auburn University pumped a total of 13,000 gallons of used oil consisting of: 2,000 gallons from Holcomb Boulevard tank S-888 and 11,000 gallons from Tarawa Terrace Tank STT-63.

10 Sep 87

Danny Sharpe, Supervisory Ecologist met with L. D. Shepard, Grounds Structural General Foreman and Don Gurganus, Transportation General Foreman. General Inspection guidelines were discussed and copies of provisions for "Tanks" 40 CFR, Subpart J and EPA Inspection form for tanks were provided.

11 Sep 87

Ken Warren, Biological Technician assisted Don Gurganus and L. D. Shepard on a survey of Hazardous Waste Oil Tanks. Mr. Warren inspected tanks for physical structural defects, and made recommendations for posting required signs and removing contaminated soil.

15 Sep 87

The Environmental Chemistry and Microbiology Section sampled waste oil tank S-781, at Building 45, tanks STT-64, STT-65, STT-66 at Tarawa Terrace, and tank AS-419 at Marine Corps Air Station. The samples were sent to JTC Environmental Consultants, Inc., to be analyzed for EP Toxicity and VOC.

21 Sep 87

Waste Conversion, Inc. pumped 10,128 gallons from tank S-781 at Building 45.

25 Sep 87

Sam Gwynn, Biological Technician, NREAD, inspected the above ground tank locate at Building M-625 at Camp Johnson. A letter was submitted to Base Maintenance with inspection results and recommendations. The tank contained a hazardous waste fuel oil and had been sited in a previous letter dated 11 June 1987.

28 Sep 87

Waste Conversion, Inc., pumped 8,879 gallons from tank S-781 at Building 45.

1 Oct 87

1. Richard Gay, Waste Management Specialist, NC Division of Health Services met with Danny Sharpe and Glenée Smith of NREAD, to review the provision for tanks regarding inspection requirements.

2. Waste Conversion, Inc., pumped 9,875 gallons from tank S-781 at Building 45.

2 Oct 87

1. Glenée Smith and Sam Gwynn, NREAD assisted Don Gurganus and Robert Huffman, Base Maintenane with the first inspection of hazardous waste fuel/oil tanks. Those tanks inspected were: S-889, STT-61, STT-62, S-781, AS-420 and AS-421. NREAD gave guidance on inspection procedures and proper signs to be posted.

2. Danny Sharpe, NREAD, L. D. Shepard, Base Maintenance, and Mary Wheat, MCAS, New River participated in a meeting at NREAD during which Mr. Shepard was advised of the results of the used oil sampled at the MCAS, during 8 July and 9 July 1987.

5 Oct 87

1. Tom Barbee, Environmental Control Specialist, NREAD, experimented with the test kit for the determination of Chlorine in Used Oil.

2. Waste Conversion, Inc. pumped 9,000 gallons from tank S-781 at Building 45.

3. Danny Sharpe and Glenée Smith, NREAD met with Col Lilley, Cliff Powell, and Don Gurganus, Base Maintenance to discuss the hazardous waste oil problem and a plan of action for when storage capacity for used oil runs out at Marine Corps Air Station, New River.

6 Oct 87

1. Waste Conversion, Inc. pumped 5,000 gallons from tanks S-781 at Buildling 45.

2. Col Lilley, Base Maintenance Officer, called Julian Wooten, Director of Natural Resources regarding BMO's proposal that the responsibility of Waste Oil Management be shifted to NREAD. Col Lilley advised Mr. Wooten, effective 12 October, 1987, that Base Maintenance intended to discontinue daily inspections of HW fuel/oil tanks on 16 October 1987.

3. Danny Sharpe, and Ken Warren, NREAD provided both classroom and field training to ten Base Maintenance employees at the request of L. D. Shepard, Roads and Grounds. HW regulations applicable to Collection and Transportation of HW oil were discussed. Guidance was provided on performing daily inspections, dealing with leaks and spills, maintaining records of inspections, and follow up corrective action. All employees present participated actively in the session and displayed an appreciation of the significance of the legal management consequences which require them to perform these duties well.

7 Oct 87

Waste Conversion, Inc. pumped 18,000 gallons from tank S-781 at Building 45.

8 Oct 87

Glenée Smith, NREAD was informed by Mary Wheat MCAS, that the Commanding Officers of MAG 26 and MAG 29 have not been properly appraised of the nature and seriousness of the waste oil management problem at MCAS, New River.

9 Oct 87

1. Waste Conversion, Inc. pumped 10,000 gallons from tank S-781 at Building 45.

2. John Riggs and Manuel Martin, NREAD met with Don Gurganus of Heavy Equipment to determine the dates that the used oil tanks at MCAS, NR were pumped prior to and after the sampling of these tanks on 8 and 9 July 1987. Mr. Gurganus was unable to provide the requested information stating the Log Book had been lost or misplaced. Mr. Gurganus further commented that the previous truck operator had maintained this log within the vehicle, however, upon inspection of the vehicle, the book was not found.

3. Danny Sharpe met with Mary Wheat, MCAS, New River, Hazardous Waste Manager, to discuss actions required to ensure that Commanding Officers of MAG 26 and MAG 29 were properly informed of the nature and importance of prompt resolution of the Freon contamination of the waste oil problem.

6240
NREAD
14 Oct 87

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

Subj: DISPOSAL OF WASTE OIL

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

Encl: (1) Log of NREAD Waste Oil Management Activity

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J. I. WOOTEN

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

IN REPLY REFER TO:
6240
NREAD
19 Oct 87

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

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Peter E. Black
PETER E. BLACK
Acting

WASTE OIL MANAGEMENT ACTIVITY LOG

13 Oct 87

1. Auburn Univeristy pumped 6,500 gallons of used oil from tank STT-63.

2. Waste Conversion, Incorporated pumped 15,100 gallons of hazardous waste oil from tank S-781 at Building 45.

3. The Environmental Chemistry and Microbiology Section procured test kits for analyzing TOX in used oil.

4. Colonel Waddell, Commanding Officer, Marine Corps Air Station, New River, met with the Commanding Officers of MAG 26 and MAG 29 to inform them of the freon contamination problem of waste oil and the importance of the legal implications of improper mixing of waste oil.

14 Oct 87

1. Waste Conversion, Incorporated, pumped 25,200 gallons of hazardous waste oil from tank S-781 at Building 45.

2. The Environmental Chemistry and Microbiology Section received VOC and freon analyses on tank S-781 at Building 45 and on tank AS-419 at Marine Corps Air Station, New River.

3. Danny Sharpe and Glenée Smith, NREAD, Mary Wheat, MCAS, participated in a meeting at MCAS, New River, with the S-4 of MAG 26, the HMDC's of MAG 26 and MAG 29 and other key officials. The purpose of the meeting was to properly address the nature and importance of prompt resolution of the freon contamination problem of waste oil.

15 Oct 87

1. Waste Conversion, Incorporated, pumped 20,000 gallons of hazardous waste oil from tank S-781 at Building 45.

2. Danny Sharpe, Elizabeth Betz, Glenée Smith and Tom Barbee, NREAD, met to discuss the problem involving freon contamination of waste oil at MCAS, New River, a plan of action for collecting samples and the costs involved with various turn-around times.

3. The Environmental Chemistry and Microbiology Section contacted Velma Duff, Purchasing and Contracting, to expedite the requisition on TOX test kits.

4. The Environmental Chemistry and Microbiology Section received an analysis for TOX on tank AS-419 at MCAS and the following analyses on tanks STT-64, STT-65, and STT-66 at Tarawa Terrace: PCB, Flashpoint, TOX, BTU, Bottom Sediment and Water, Percent Water and Viscosity.

16 Oct 87

1. The Environmental Chemistry and Microbiology Section collected samples of used oil at AS-431, AS-504, and AS-516. For each tank sampled, the following were noted:

a. Location sketch

b. Tank size

c. Level of tank

d. Presence of sediment

e. Unit responsible for tank

ENCLOSURE (1)

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

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e. Unit responsible for tank

ENCLOSURE (1)

LOG OF ACTIONS ON DISPOSITION OF OIL DRMO

6 Oct 87	*0900 Phonecon J. Dempsey/Hipp - Requested emergency funding for disposal of 60,000 gallons of waste oil at the New River Air Station.*
6 Oct 87	*Indorsed Base Logistics letter to Region for action. Requested emergency funding for all oil stored at the Camp Lejeune Complex.*
7 Oct 87	*Phonecon J. Dempsey/Hipp - Battle Creek to fax funding approval on 30,000 gallons at New River Air Station oil today to Memphis. She is also requesting emergency funding for remaining 192,000 gallons at tank 45. The entire tank was funded (272,000 gal) until contractor had sample done and found too many ppm's of halogen in the oil. They negotiated with Battle Creek on price. Was .82¢ per gallon to remove - now $2.69 to remove, thus reducing the gallons funded from 272,000 to 80,000 from tank 45. The current contract expires tomorrow but they will extend. The new contract will let shortly and remaining oil will be included in it. She doesn't feel there will be any problem in removing all oil by 1 Dec 87.*
Thru 7 Oct 87	*Thru this day Waste Conversion has removed 41,382 gallons from tank 45.*
8 Oct 87	*Phonecon Hipp/Dempsey - Funding approved for additional 192,000 gallons waste oil from tank 45. Order will go to waste conversion in writing today for confirmation. It is OK for them to remove 30,000 from air station if we forgo removal of 30,000 from tank 45 if the contractor agrees. She is working for the funding on the additional 30,000 gal.*
8 Oct 87	*Phonecon Jim Brennon, Waste Conversion/Hipp - He understood it was 30,000 in addition to the 192,000 if so - no problem to remove first. If not, he needs to talk to his people as there may be problems with the analysis. He will let me know for sure tomorrow or Tuesday.*
9 Oct	*Waste Conversion picked up 10,000 gallons of oil, Tank 45. Total 51,382.*
9 Oct 87	*Phonecon J. Brennon, Waste Conversion/Hipp - Received funding approval doc from Memphis for 60,000 gallons at Air Station and also remaining oil at tank 45. - Will start at Air Station within next couple of weeks.*
13 Oct 87	*Total removed to date 70,882, gallons removed by Waste Conversion 0844 AM. Will have truckers in today.*

13 Oct 87	Waste Conversion removed 15,100 gallons - Total 85,982.
14 Oct 87	Waste Conversion removed 25,200 gallons - Total 111,182.
15 Oct 87	Waste Conversion removed 20,000 gallons - Total 131,182.

6 Oct 1987

DRMO-ZWM 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

Nadine Hipp
Chief, Defense Reutilization
and Marketing Office

Copy to:
EMO
NREAD
SJA
FAC

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

IN REPLY REFER TO:

6280/2
FAC
OCT 0 2 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

T. J. DALZELL
By direction

Copy to:
BMO
NREAD
SJA

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

IN REPLY REFER TO:

6280/2
FAC
OCT 0 2 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).

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

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 11-12-87

TO:

BASE MAINT O

PUBLIC WORKS O

COMM-ELECT O

DIR., NAT. RESOURCES & ENV. AFFAIRS

DIR, FAMILY HOUSING

DIR, BACHELOR HOUSING

BASE FIRE CHIEF

ATTN: Mr Shaya

1. Attached is forwarded for info/action.

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

3. Your file copy.

BWEston
by dir

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

MCBCL 5216/21 (REV. 04-85)

13 OCT 87 Waste Conversion removed 15,100 gallons - Total 85,982.

14 OCT 87 Waste Conversion removed 25,200 gallons - Total 111,182

15 OCT 87 Waste Conversion removed 20,000 gallons - Total 131,182

19 OCT 87 Waste Conversion removed 5,000 gallons - Total 136,182

20 Oct 87 Waste Conversion removed 5,300 gallons - Total 141,482

21 OCT 87 Waste Conversion removed 15,450 gallons - Total 156,932

22 OCT 87 Waste Conversion removed 8,187 gallons - Total 165,119

23 OCT 87 Waste Conversion removed 10,200 gallons from tank 45 and 8,950 from the Air Station- Total 184,269.

27 OCT 87 Waste Conversion removed 4,000 gallons from the Air Station Total 188,269.

28 OCT 87 Phonecon Eggers/Toomy with Waste Conversion - They will start back next week on removal of oil at the Air Station.

3 NOV 87 Waste Conversion removed 11,000 gallons from tank 421 Air Station.- Tank 421 is now empty. Total 199,269

3 NOV 87 New contractor, Special Waste Inc., will take samples of oil tomorrow - Also Waste Conversion will be back in to start removing oil from tank 420 at Air Station. Tank 419 at Air Station has not been turned in to us yet. Gurganus said it's full and capped off- but said contractor couldn't take a sample. I told him it would rush progress on removal if they could.

4 NOV 87 Waste Conversion removed 5,800 from tank 420 at Air Station. Total 205,069

5 NOV 87 Waste Conversion removed 11,600 gallons - Total 216,669

6 NOV 87 Waste Conversion removed 2,200 from tanks 420 and 421. Tank 420 was reported to be empty on 3 NOV 87; However, it had some sludge in the bottom. Now, both tanks 420 and 421 are empty.

Pick up at DRMO 18 Dec 87
JLW

12 NOV 87 New contractor should start oil removal per phonecon Eggers/ Dempsey. However, they are questioning solvents found in the analysis they had run. They may decide to renegotiate price of removal with region. Their bid was only .25¢ per gallon.

17 NOV 87 At 3:25 received TID's on tank 419 at air station, Tank STT-64 and STT 65 along with analysis.

18 NOV 87 George Eggers prepared and mailed a delivery order requesting removal of waste oil from the above tanks today. Request submitted to Memphis. New contractor is here taking samples from tanks 419, 61,62, 889 and 891 (for water). They have already sampled for Tox, flashpoint and metals. They will also take samples of tanks M625, 64 and 65. This info. was given Danny Sharp on this date. I recommended that a request for extension be submitted to the State for removal since it's so close to 1 Dec. Further told him I'd try to find out an approximate removal start date and completion date when the contractor comes back this afternoon. Danny would like this info. prior to writing for an extension.

18 NOV 87 Phonecon Eggers/Dan Fisher, Special Waste Inc. Will have two to four tankers in to start removal on Friday, Monday and Tuesday.

3 DEC 87 Special Waste removed Holcomb 891 tank 11,000 gallons.

Total: 229,869

4 DEC 87 Special Waste emptied 891 on Holcomb Blvd. 3,500 gallons.

Total: 233,369

4 DEC 87 Special Waste emptied tank 889 Holcomb 1,300 gallons.

Total: 234,669

4 DEC 87 Special Waste Inc, proposed schedule as follows:

Monday Dec 7 - 5 tankers at 0800
Tuesday Dec 8 - 3 tankers at 0800
Wednesday Dec 9 - 5 tankers at 0800

7 DEC 87	Special Waste removed 11,500 gallons from tank TT 61; 8,000 gallons from tank TT 62; 8,600 gallons from tank 889 on Holcomb.	
		Total: 262,769
8 DEC 87	Special Waste removed 6,000 gallons from tank TT 61: 7,500 from tank TT 62; 4,500 gallons from tank TT 64.	
		Total: 280,769
9 DEC 87	Special Waste removed 10,100 gallons from 419 at air station.	
		Total: 290,869
16 DEC 87	Special Waste removed 2,500 gallons from TT 62; 3,000 gallons from tank on Holcomb; 100 gallons from tank M625; 4,900 gallons from air station. Tanks 889 and 891 on Holcomb are now empty.	
		Total: 301,369
17 DEC 87	Special Waste removed 2,200 gallons from TT 61 and 2,600 gallons from TT 64. Tanks TT 61 and TT 64 are now empty.	
		Total: 306,169