

# Memorandum

5200  
NREAD

DATE: 24 July 1987

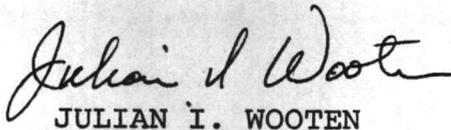
FROM: Director, Natural Resources and Environmental Affairs Division,  
Marine Corps Base, Camp Lejeune  
TO: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune

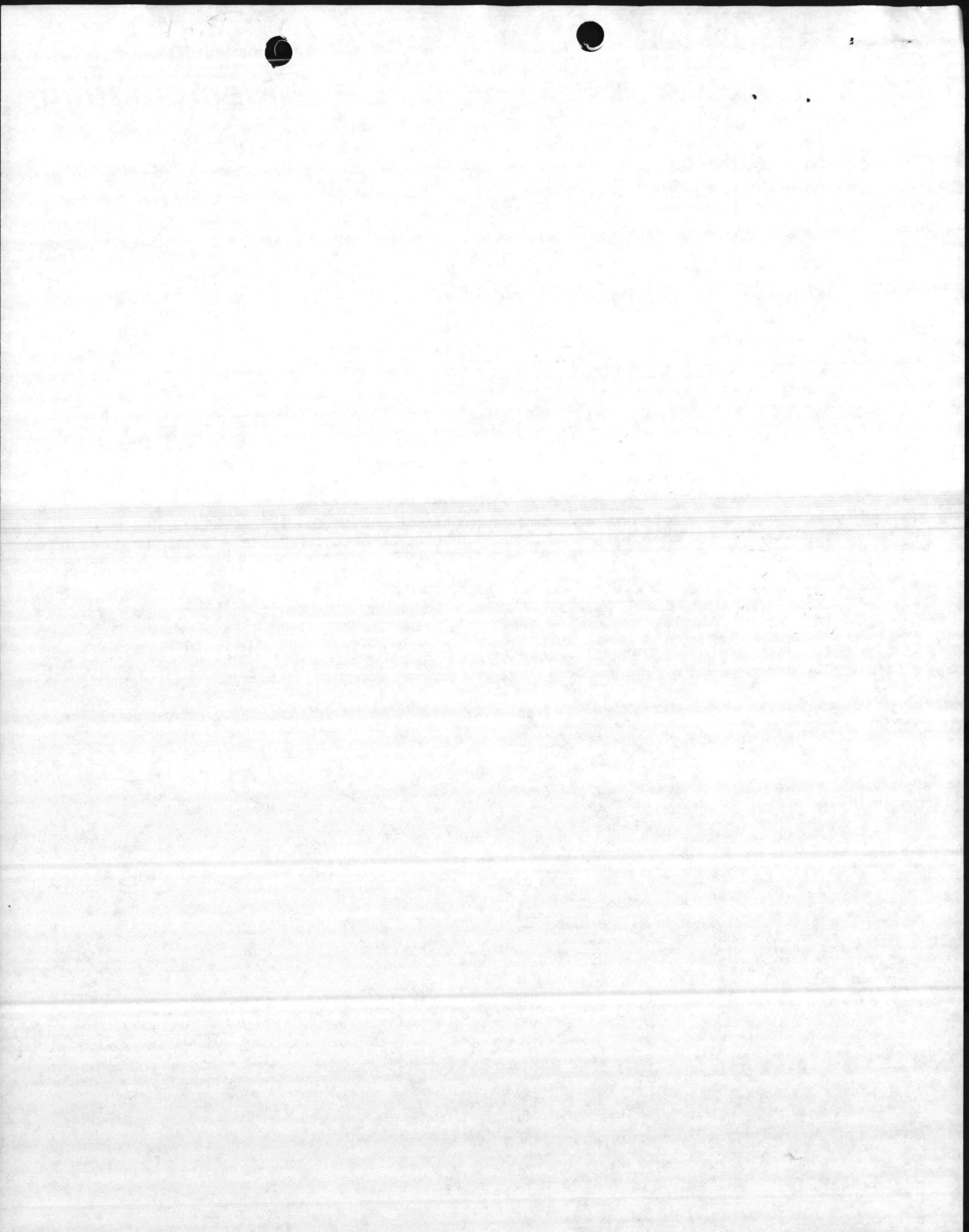
SUBJ: CHIEFS OF STAFF LUNCHEON

Ref: (a) Yr memo 5050 FAC of 17 July 1987

Encl: (1) Hazardous Waste Management  
(2) Unauthorized Vehicle Traffic on Onslow Beach

1. In accordance with the reference, enclosures (1) and (2) are submitted.

  
JULIAN I. WOOTEN



HEADQUARTERS, MARINE CORPS BASE, CAMP LEJEUNE

ACTION BRIEF

Date:

Staff Section: Assistant Chief of Staff, Facilities,  
Marine Corps Base

Subj: HAZARDOUS WASTE MANAGEMENT

Ref: (a) BO 6240.5A  
(b) Resource Conservation and Recovery Act

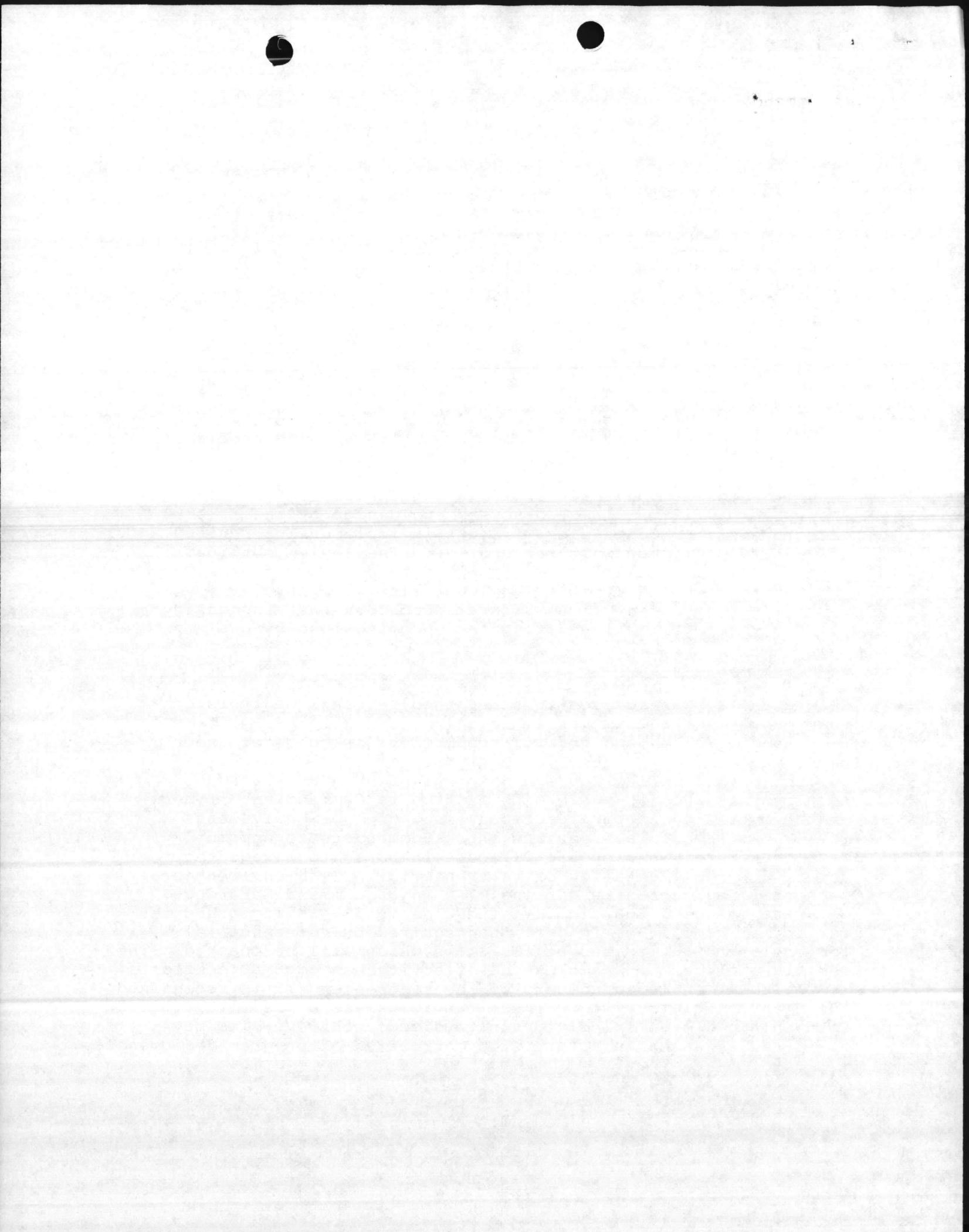
Encl: (1) Hazardous Waste Inspection Form

Problem:

Violations of references (a) and (b) are an ongoing problem. Base environmental personnel will begin a round of formal compliance inspections within each major command not later than 1 Septmeber 1987. As shown in the enclosure, the inspections will be directed toward evaluation of the effectiveness of Commanding Officers in implementing revised procedures published in reference (a). The review outlined in the enclosure will certainly appear threatening to the organizations being inspected. The review will involve a significant amount of time. There is concern that unnecessary controversies will arise during the upcoming inspections.

Background/Discussion:

Reference (a) was revised to strengthen internal controls on (HW) management activities of organizations generating items regulated by state and federal regulations promulgated under reference (b). Reference (a) assigns primary responsibility for the proper collection and disposal of HW and related requirements such as waste minimization to Commanding Officers at the battalion, separate company, squadron or equivalent level. Reference (a) requires these Commanders to appoint Hazardous Material Disposal Officers (HMDO's) to manage the day-to-day implementation of reference (a). Base environmental personnel are currently working with major command Hazardous Material Disposal Coordinators (HMDC's) in developing schedules for formal compliance inspections required by reference (a). The enclosure outlines specific items which will be checked. The enclosure places emphasis on the effectiveness of HMDO's efforts to implement the requirements of the reference. It is recognized that many problems will be identified. Unless a positive attitude is maintained by all individuals involved, controversies may easily arise which interfere with correction of program deficiencies.

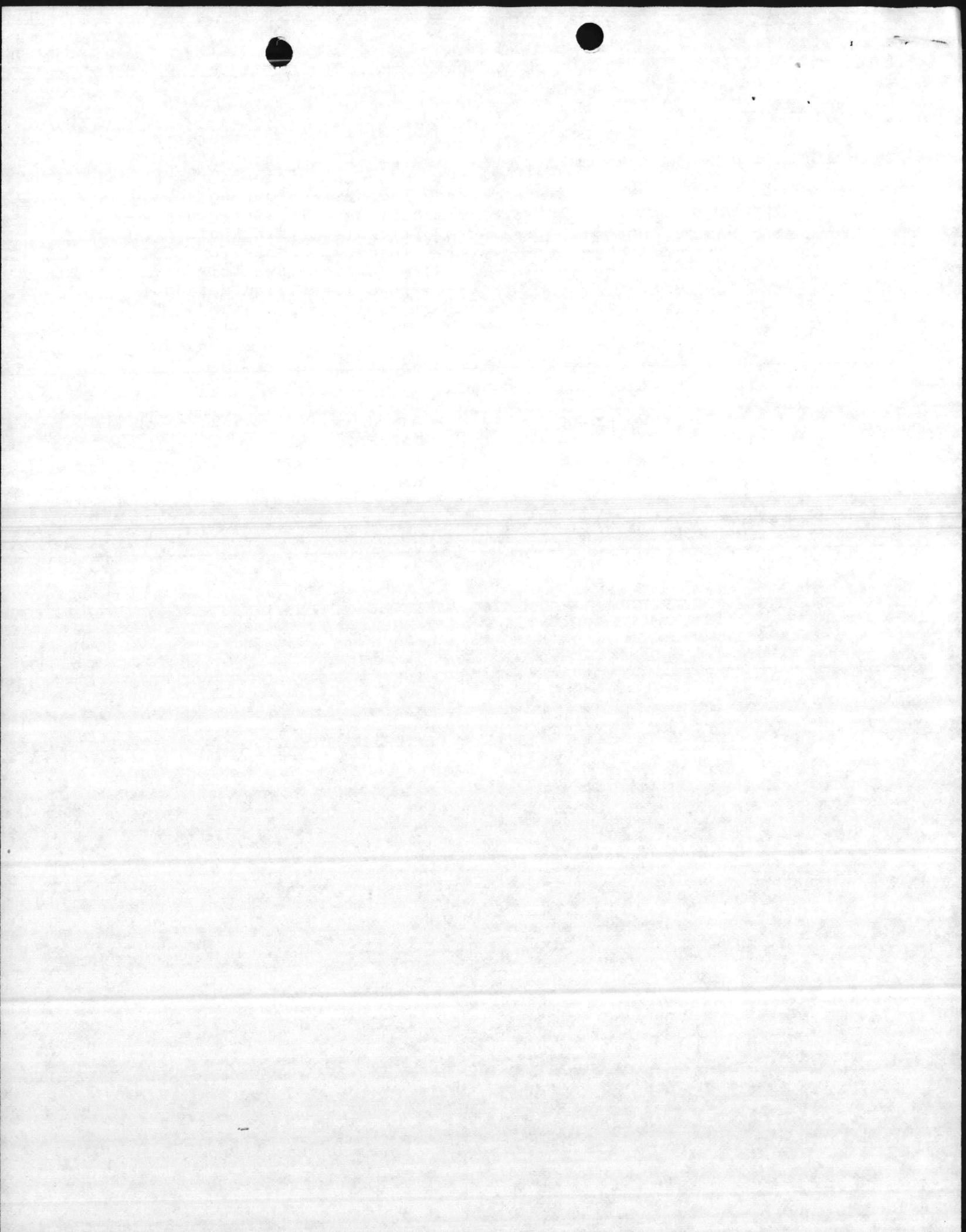


Recommended Action:

It is requested that the cognizant HMDC for each major command work closely with base environmental personnel in negotiating reasonable compliance schedules with commanding officers for correcting violations of the reference indentified during future hazardous waste compliance inspections. It is further requested that each command reassure officials within their cognizance, that the objectives of the inspections are to identify and correct deficiencies. Also, officials involved should be aware that response to violations identified during the inspections will be the responsibility of their chain of command.

Very respectfully,

T. J. DALZELL  
AC/S, Facilities



HAZARDOUS WASTE MANAGEMENT INSPECTION REPORT

DATE: \_\_\_\_\_

Organization being inspected: \_\_\_\_\_

Organization Point of Contact: \_\_\_\_\_

\_\_\_\_\_ Phone Number: \_\_\_\_\_

Name of inspector/other inspection participants/phone#: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

1. Evaluation of the organizations Hazardous Waste Management Program:

a. Has the Commanding Officer published written hazardous waste management objectives, goals, policies and procedures?

\_\_\_\_\_ YES \_\_\_\_\_ NO

b. Has the Commanding Officer appointed a primary and at least one alternate Hazardous Material Disposal Officer (HMDO)?

\_\_\_\_\_ YES \_\_\_\_\_ NO

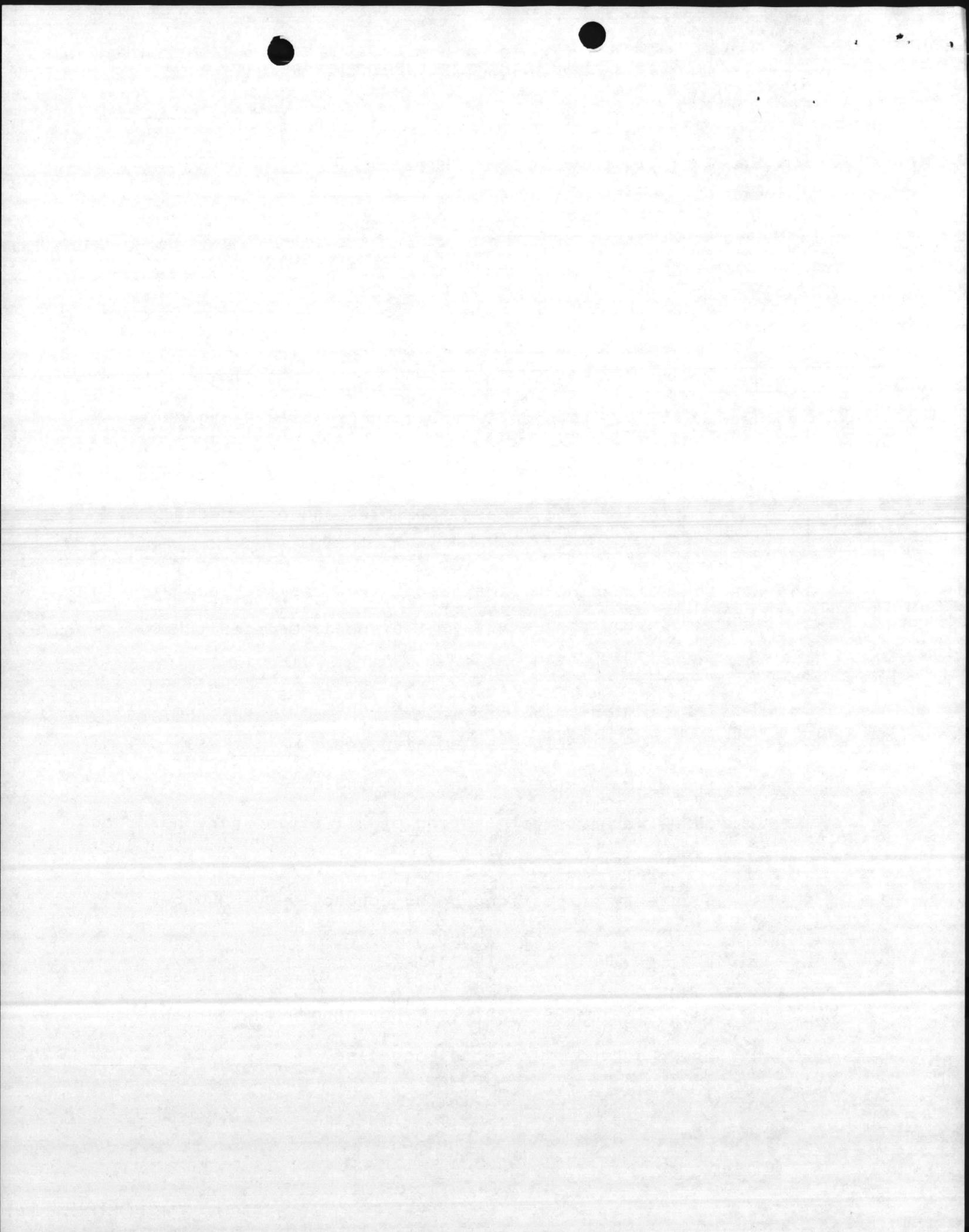
c. Has the Commanding Officer established internal controls to ensure ongoing compliance with BO 6240.5A? \_\_\_\_\_ YES

\_\_\_\_\_ NO (Describe how violations are handled)

d. Does HMDO have current listing of all sites where hazardous wastes are handled? \_\_\_\_\_ YES \_\_\_\_\_ NO

e. Are quarterly inspections being conducted by HMDO per BO 6240.5A? \_\_\_\_\_ YES \_\_\_\_\_ NO

f. Do records indicate that HMDO is providing follow up to correct discrepancies identified by either HMDO's inspections, or inspections conducted by external agencies? \_\_\_\_\_ YES \_\_\_\_\_ NO



g. Regarding Hazardous Waste Training:

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

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

(3) Are current up-to-date training records available in HMDO's files for each hazardous waste handler and manager? \_\_\_\_\_ YES \_\_\_\_\_ NO

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

(5) Are all personnel provided adequate hazardous waste training within six months of date assigned to hazardous waste duties? \_\_\_\_\_ YES \_\_\_\_\_ NO

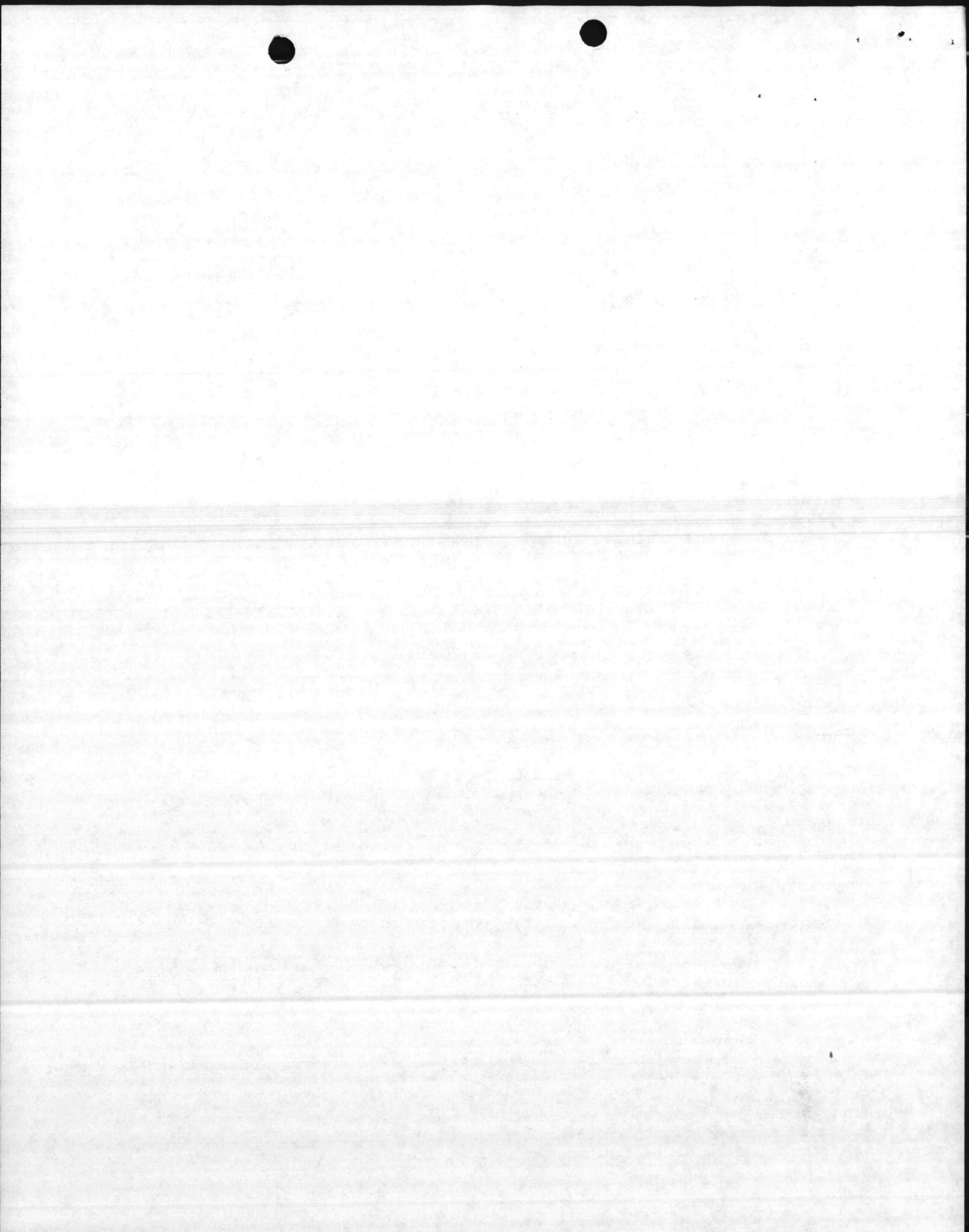
(6) Has HMDO notified cognizant Hazardous Material Disposal Coordinator (HMDC), in a timely manner of the training requirements for each newly assigned hazardous waste handler or manager? \_\_\_\_\_ YES \_\_\_\_\_ NO

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

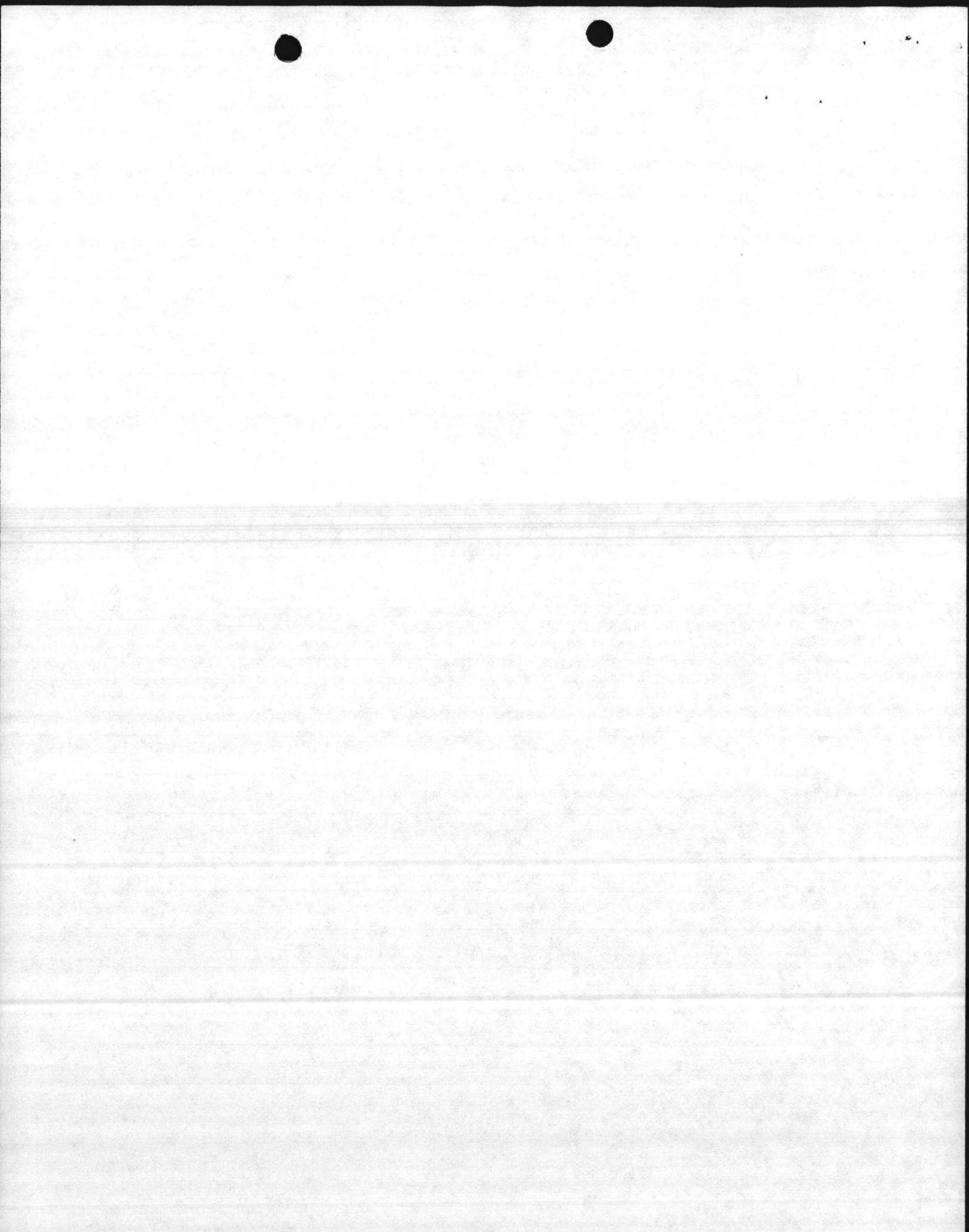
h. Regarding notification of hazardous waste activity:

(1) Have Waste Identification Documents (WID's) been properly submitted to HMDC on all hazardous waste? (Ref. 6240.5A) \_\_\_\_\_ YES \_\_\_\_\_ NO

(2) Are properly completed WID's on hand? \_\_\_\_\_ YES \_\_\_\_\_ NO







Evaluation of Individual Hazardous Waste Generation, Handling and Storage/Accumulation Sites

1. Administrative:

a. Name of Site: \_\_\_\_\_

Organization in charge: \_\_\_\_\_

Responsible Official: \_\_\_\_\_

b. Adequacy of hazardous waste management standard operating procedures (SOP):

(1) Is a written SOP available? \_\_\_\_\_ YES \_\_\_\_\_ NO

(2) Does SOP provide names and phone numbers of current HMDO's and HMDC's? \_\_\_\_\_ YES \_\_\_\_\_ NO

(3) Does SOP contain the following?

(a) BO 6240.5A \_\_\_\_\_ YES \_\_\_\_\_ NO

(b) BO 11090.1B \_\_\_\_\_ YES \_\_\_\_\_ NO

(c) BO 11090.3 \_\_\_\_\_ YES \_\_\_\_\_ NO

(d) WID for each HW handled \_\_\_\_\_ YES \_\_\_\_\_ NO

(e) HM/HW Spill/Emergency Procedures \_\_\_\_\_ YES \_\_\_\_\_ NO

(f) Copies of weekly inspections \_\_\_\_\_ YES \_\_\_\_\_ NO

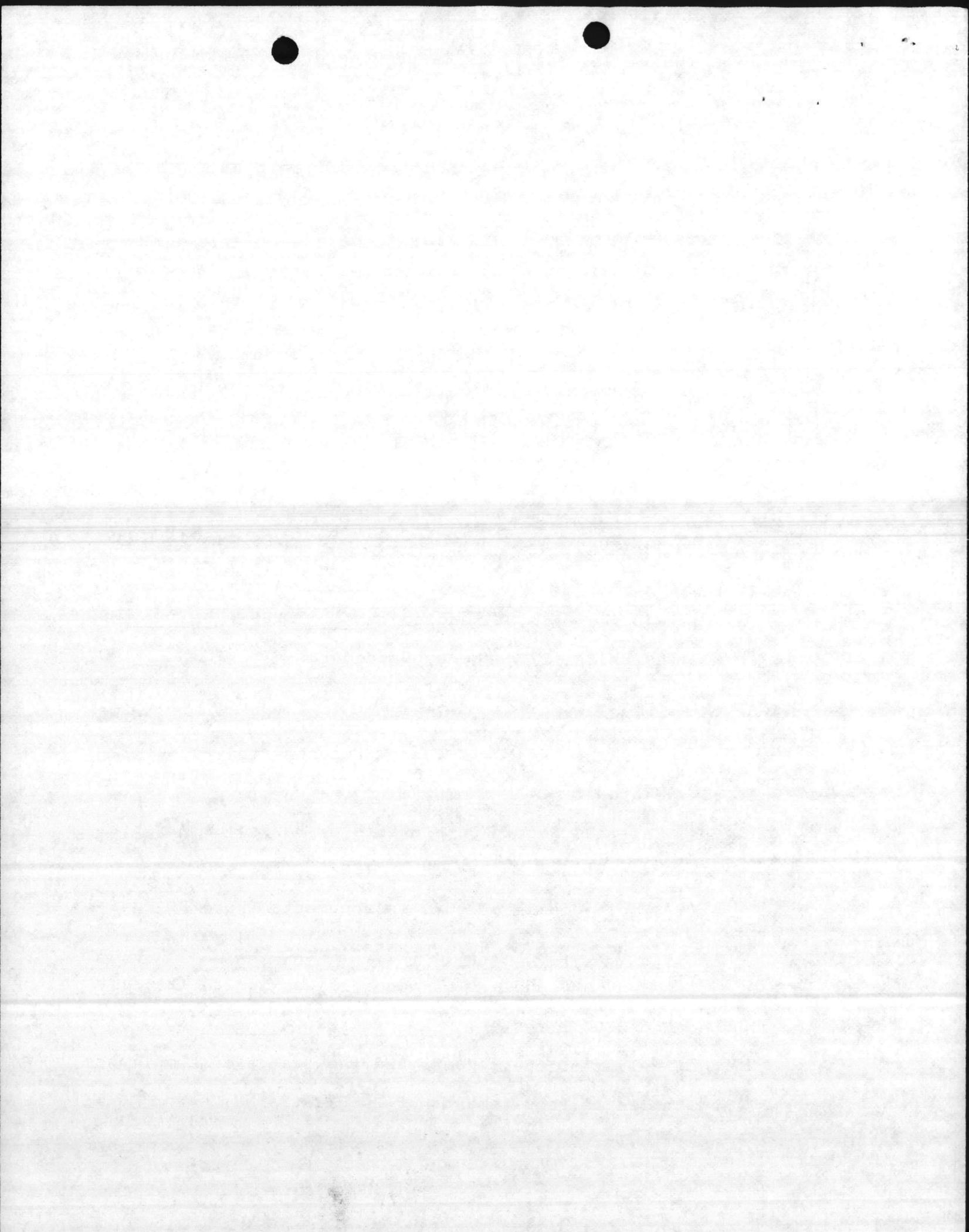
(g) Location sketch for each HW generation, accumulation, and storage areas? \_\_\_\_\_ YES \_\_\_\_\_ NO

(h) Material Safety Data Sheets or Hazardous Material Information System for each HW? \_\_\_\_\_ YES \_\_\_\_\_ NO

(i) Sample copies of turn-in documents (Form DD-1348-1) and HW labels for each type of HW generated? \_\_\_\_\_ YES \_\_\_\_\_ NO

c. Are there any HW handlers or managers working at the site who are not on the HMDO's roster? \_\_\_\_\_ YES \_\_\_\_\_ NO

(If yes, attach a list of their names and the status of compliance with personnel training requirements of BO 6240.5A)



DATE: \_\_\_\_\_

2. Condition of HW containers and related storage area

a. Do all HW containers have the words "Hazardous Waste" clearly spelled out? \_\_\_\_\_ YES \_\_\_\_\_ NO

b. Are contents of all containers clearly labeled? \_\_\_\_\_ YES  
\_\_\_\_\_ NO

c. Is the accumulation date clearly marked on each HW container? \_\_\_\_\_ YES \_\_\_\_\_ NO

d. Is HW being removed from the site in less than 90 days?  
\_\_\_\_\_ YES \_\_\_\_\_ NO

e. Condition of containers:

(1) Leaking drums \_\_\_\_\_ YES \_\_\_\_\_ NO

(2) Rusted drums \_\_\_\_\_ YES \_\_\_\_\_ NO

(3) Dented or bulging drums \_\_\_\_\_ YES \_\_\_\_\_ NO

(4) Are all container bungs or caps in place \_\_\_\_\_ YES \_\_\_\_\_ NO

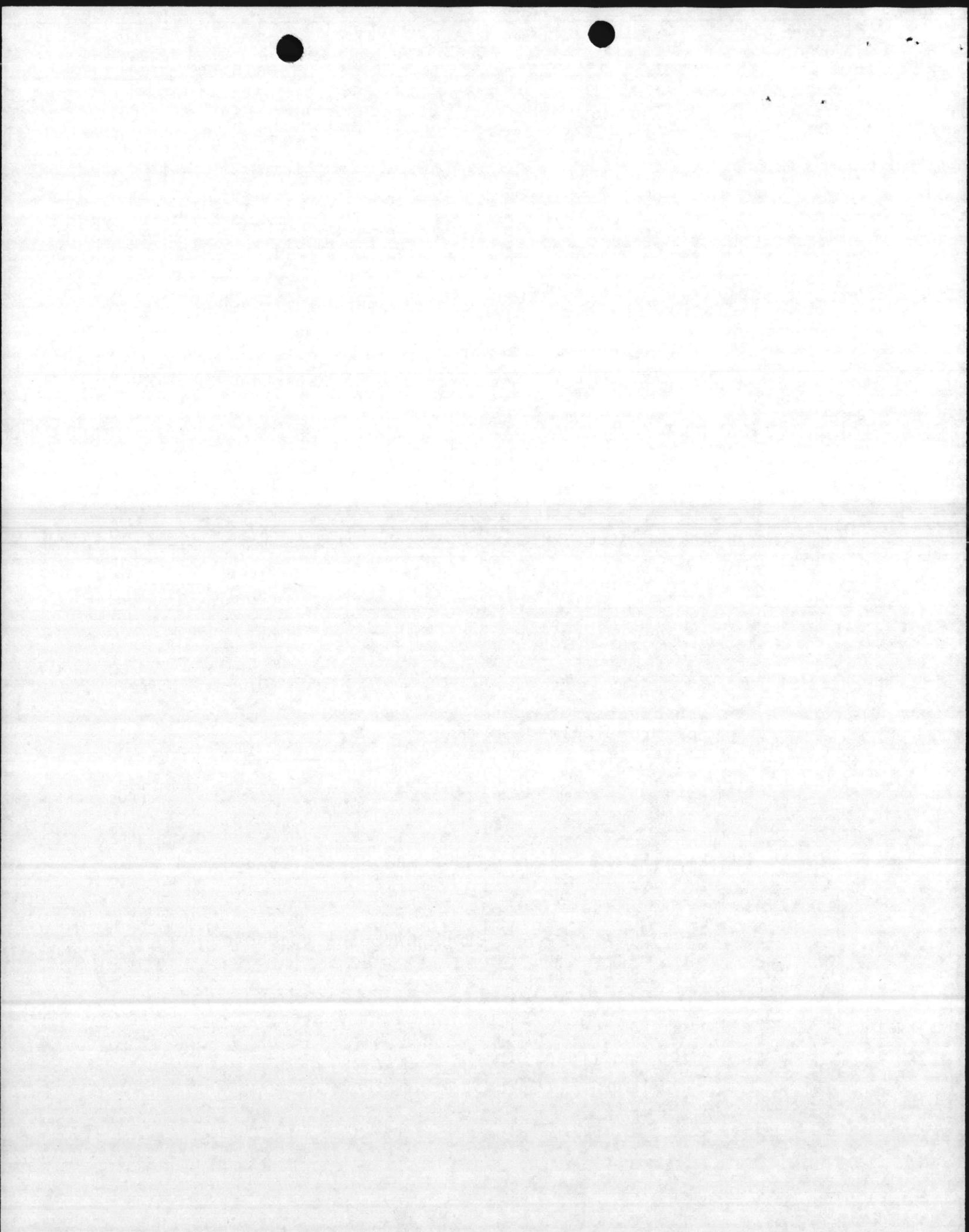
(5) Are covers for open top drums bolted in place \_\_\_\_\_ YES \_\_\_\_\_ NO

f. Is there any evidence of spills or leaks on the ground?  
\_\_\_\_\_ YES \_\_\_\_\_ NO

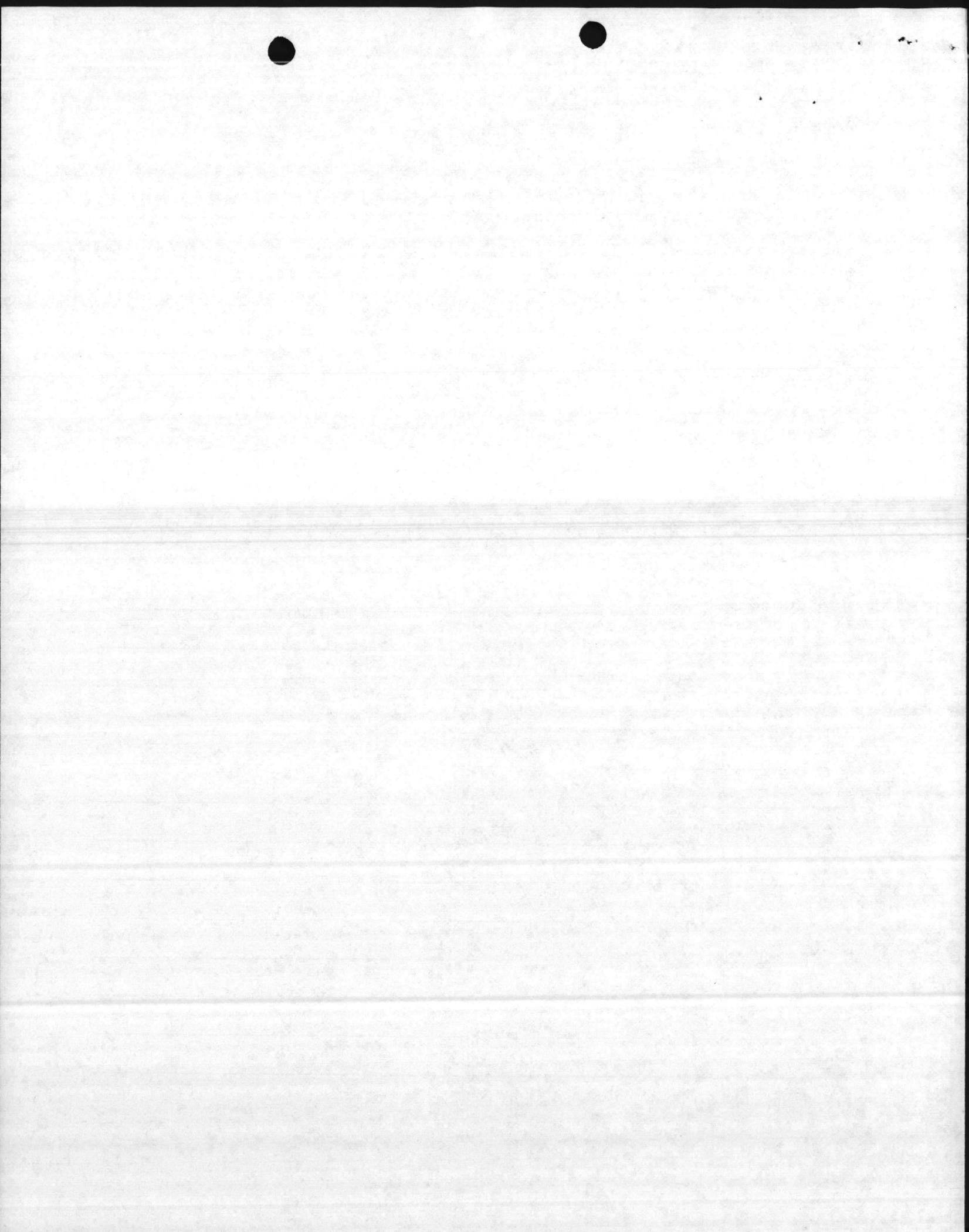
g. Are contingency plans posted and currently updated at all sites? \_\_\_\_\_ YES \_\_\_\_\_ NO

h. Are weekly inspections of HM/HW being conducted and corrective action noted properly? \_\_\_\_\_ YES \_\_\_\_\_ NO

i. Are Spill Emergency Response signs posted? \_\_\_\_\_ YES  
\_\_\_\_\_ NO (Ref. BO 11090.1B)







HEADQUARTERS MARINE CORPS BASE, CAMP LEJEUNE

ACTION BRIEF

Date:

Staff Section: Assistant Chief of Staff, Facilities,  
Marine Corps Base, Camp Lejeune

Subj: UNAUTHORIZED VEHICLE TRAFFIC ON ONSLOW BEACH

Ref: (a) BO 11017.1A  
(b) USFWS Biological Opinion

Encl: (1) NREAD Log Book Entry by Mr. Gerald Monahan of 23 Jul 87

Problem:

Vehicle traffic both POV and government owned, on Onslow Beach continues to be a problem between sunset and sunrise when threatened sea turtle nesting occurs. This is in direct conflict with references (a) and (b), which provides guidance for use of the beach during the sea turtle nesting season. There is a possibility that vehicle traffic on the beach is responsible for a significant reduction in the total number of turtle nests during the 1987 nesting season. To date there are only a total of 6 nests on the beach, as compared to 26 in 1986, and 27 in 1985.

Background/Discussion:

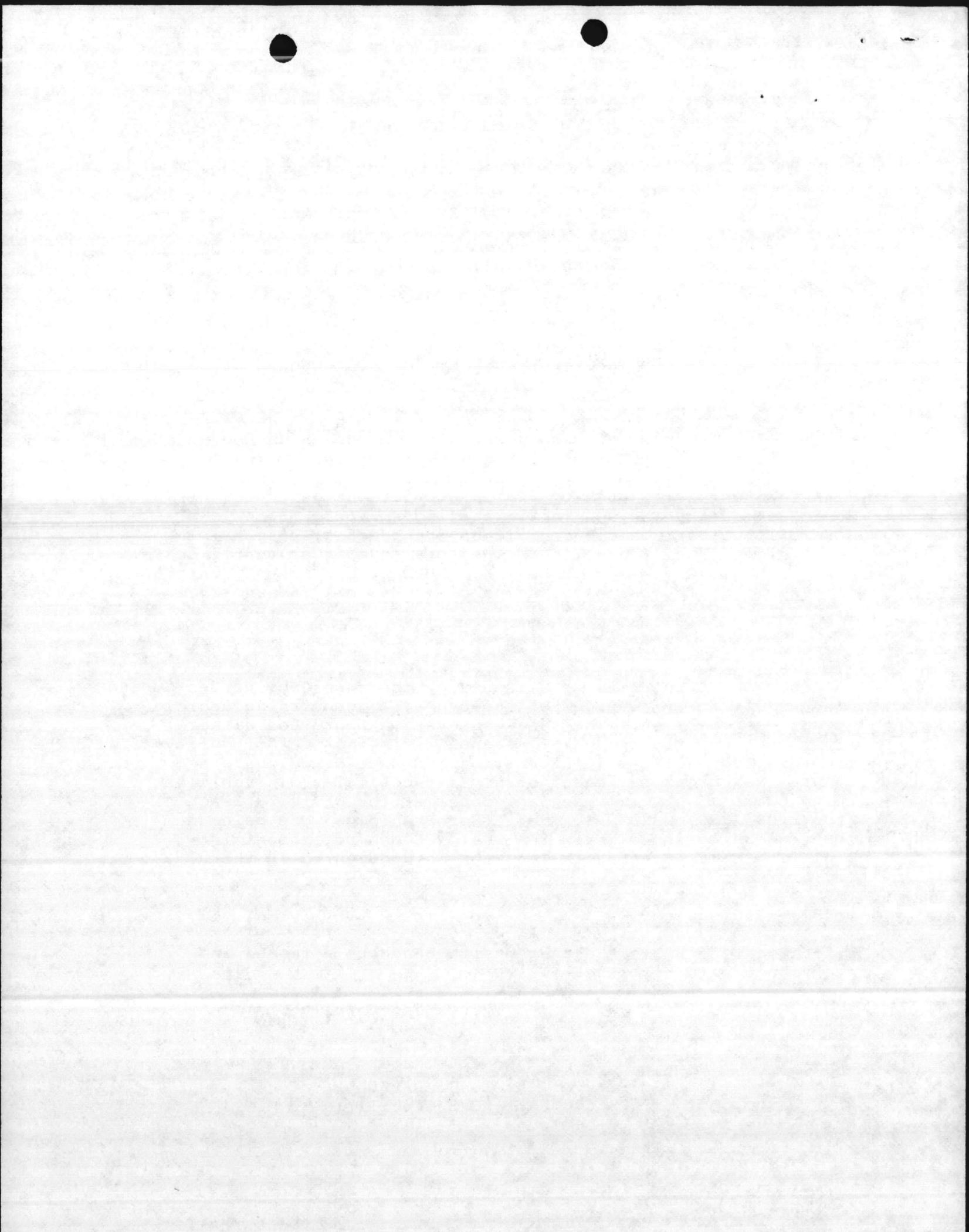
Numerous citations have been issued by the Base Game Warden during June - July for violations of reference (a) concerning vehicle use at Onslow Beach. The Base Conservation Board has either refused to hear the cases or reached a finding of "not guilty", according to unofficial information NREAD personnel have received. Natural Resources personnel observed two All Terrain vehicles being operated on the beach and dunes at the Officers Beach from 2200-2230 on 23 July 1987. Both vehicles were being operated by personnel from the Onslow Beach Detachment in violation of references (a) and (b) as documented in the enclosure.

Recommended Action:

Enforcement of vehicle use at Onslow Beach be effected in accordance with reference (a).

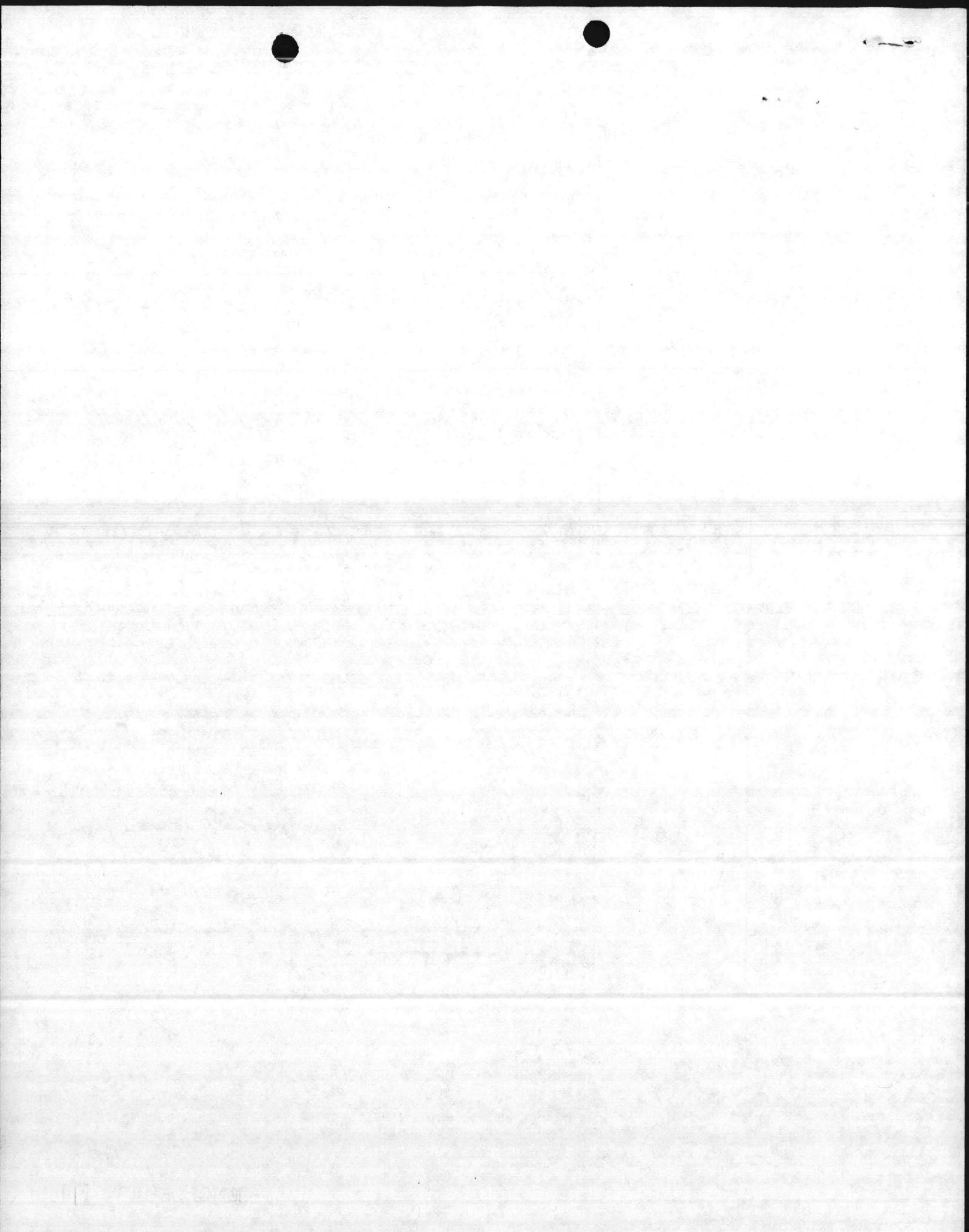
Very respectfully,

T. J. DALZELL  
AC/S, Facilities



NREAD LOG BOOK ENTRY

7-23-87	0730	NO ACTIVITY AT IMPACT AREA DRP
	2045	Monahan Jones on night watch
	2115	TO Beach
	0440	from beach - NO Turtle Activity - lots of military movement south of Pier.
		<p>Note: Beach detachment personnel "playing" on patrol from 2200-2230 with ATV. Then a change of personnel and real playing on the beach began. I talked to two of the detachment including the one really abusing the vehicle and told them I was turning them in. If anyone could have seen the tracks before the tide came in it would be obvious how they are misusing their equipment. Really not helpful for nesting turtles (M)</p>
	0500	Secure



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

22 July 87  
Date

From: Director

To: Danny

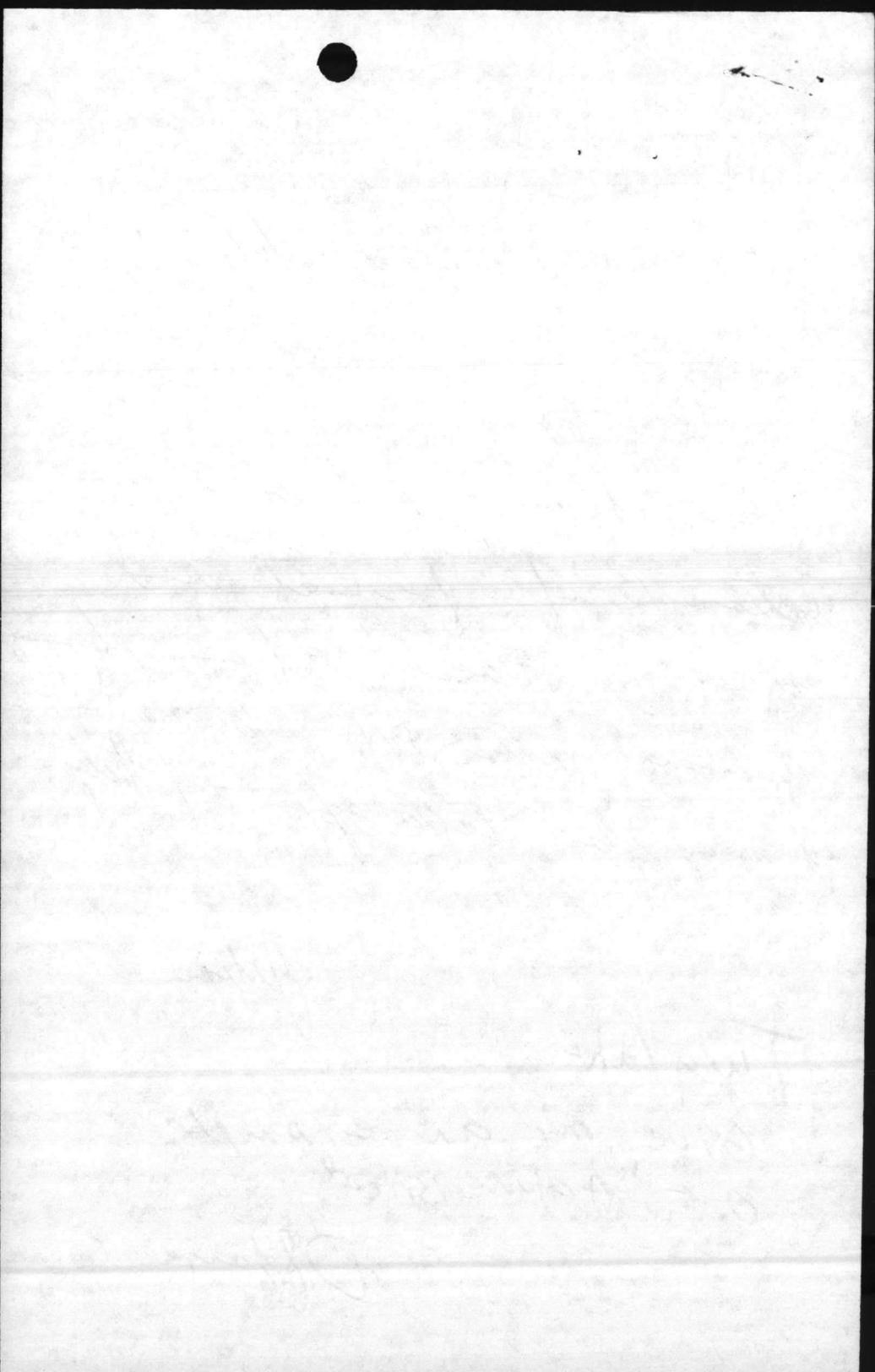
Subj:

Go ahead & put this in  
"Action Brief" format and  
send to Foe as I am planning  
A. leave this PM and 23<sup>rd</sup>  
it may also take off 24 July.

Twyla-

Give me an example  
of "Action Brief".

D. Stover



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

20 July 87  
Date

From: Director

To:

Peter <sup>141</sup> <sup>NO</sup>

Subj:

Charles

Danggs YES

See attached - Do you  
have anything for the  
Chief of Staff Luchon?

Dml 24 July 87

Julian

Advise that New round  
of HW Compliance inspections  
are starting. That will focus  
on management/internal controls.  
Could/will be embarrassing to  
OIC/CO not implementing BOB40.5



I have not had time to  
 do this yet. I will try  
 to do it as soon as I  
 can. I will try to do  
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# Memorandum

5050  
FAC

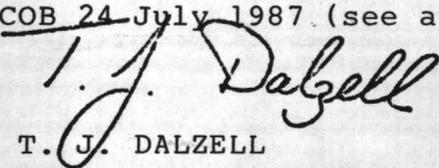
DATE: 17 July 1987

FROM: Assistant Chief of Staff, Facilities, Marine Corps Base, Camp Lejeune

TO: Distribution

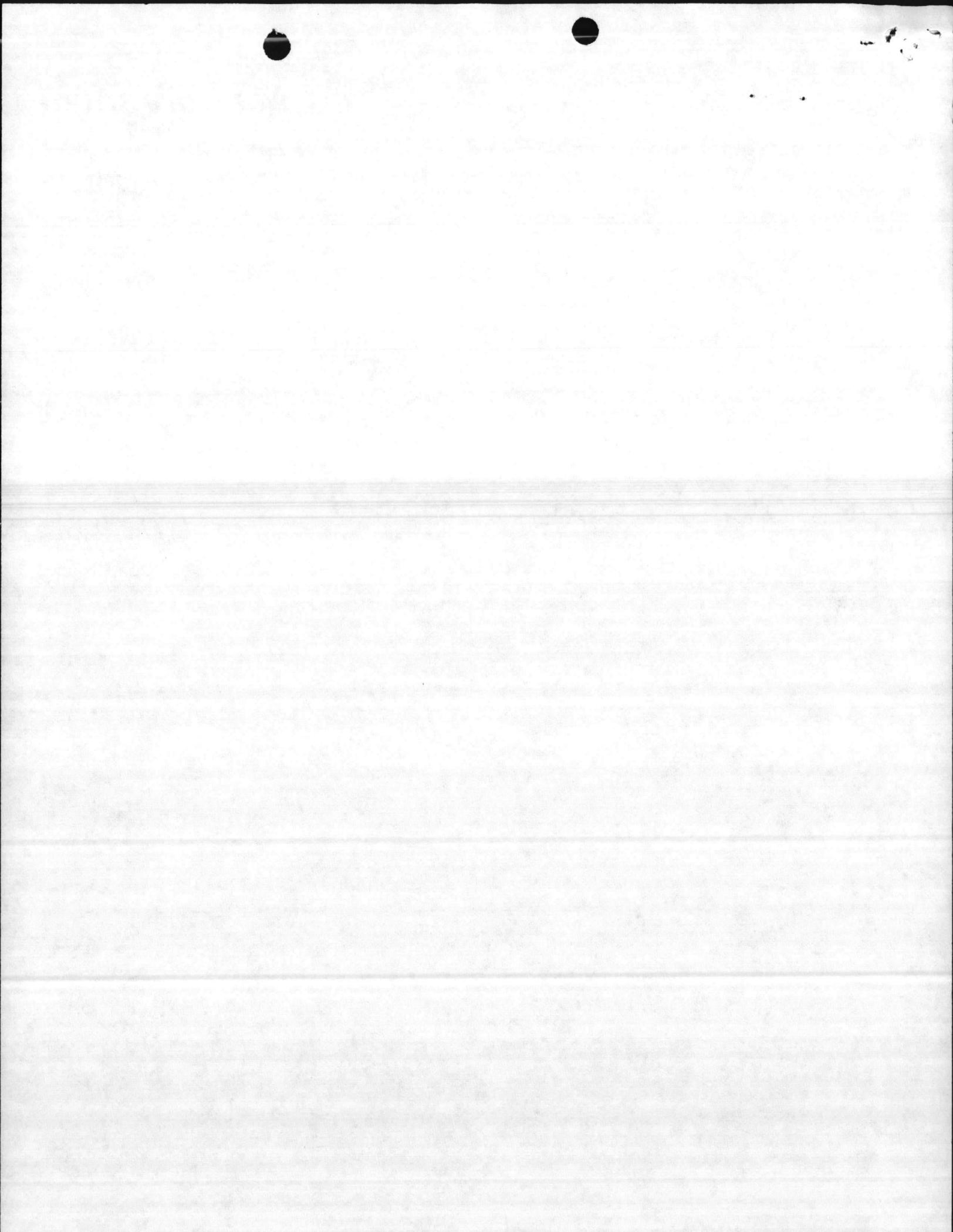
SUBJ: CHIEFS OF STAFF LUNCHEON

1. Request recommended agenda items in "Action Brief" format be provided to this office by COB 24 July 1987. (see attached).

  
T. J. DALZELL

Distribution:

CEO  
MAIN  
DFH  
DBH  
PWO  
FIRE  
NREAD  
FACMGMT0





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

IN REPLY REFER TO:

5050

CS

15 JUL 1987

MEMORANDUM FROM THE CHIEF OF STAFF

Subj: CHIEFS OF STAFF LUNCHEON

1. The Chiefs of Staff from all commands aboard the Base will meet on 30 July 1987 at a working luncheon. The purpose of this luncheon is to discuss matters of mutual interest. Accordingly, each section is requested to submit agenda items that may be discussed during this luncheon. Agenda items should be in "Action Brief" format, no more than one page.
2. Please provide your agenda items to this office not later than 27 July 1987. Negative response required in writing.

*M. C. Harrington*  
M. C. HARRINGTON

Distribution: GenStaff  
OrgCmdrs

