

FILE FOLDER

DESCRIPTION ON TAB:

Consent agreement

Hw/Hm

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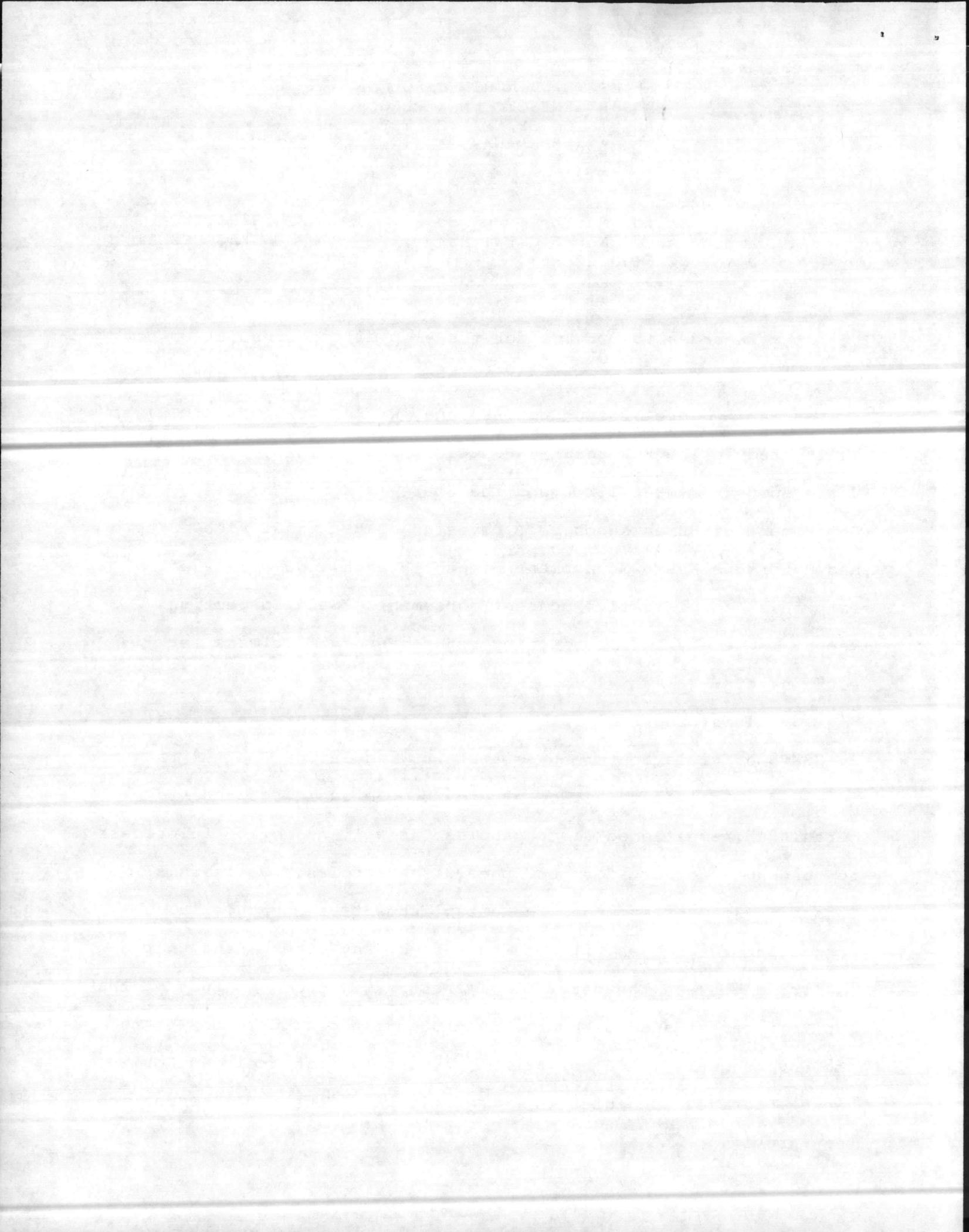
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STATE OF NORTH CAROLINA
DEPARTMENT OF HUMAN RESOURCES
DIVISION OF HEALTH SERVICES
SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH

In Re: United States Marine Corps Base) ADMINISTRATIVE
Camp Lejeune, North Carolina) CONSENT AGREEMENT
ID NO. NC 6170022580) DOCKET NO. _____

In order to provide for the expeditious resolution of discrepancies in the management of Hazardous Waste by United States Marine Corps Base, Camp Lejeune, North Carolina (USMCB) as delineated in the RCRA SITE INSPECTION REPORT (Inspection Report) dated August 4, 1986 USMCB and the State of North Carolina, Department of Human Resources, Division of Health Services, Solid and Hazardous Waste Management Branch (Branch), do hereby enter into this administrative consent agreement. Said Inspection Report is hereby incorporated by reference as if it were set forth herein.

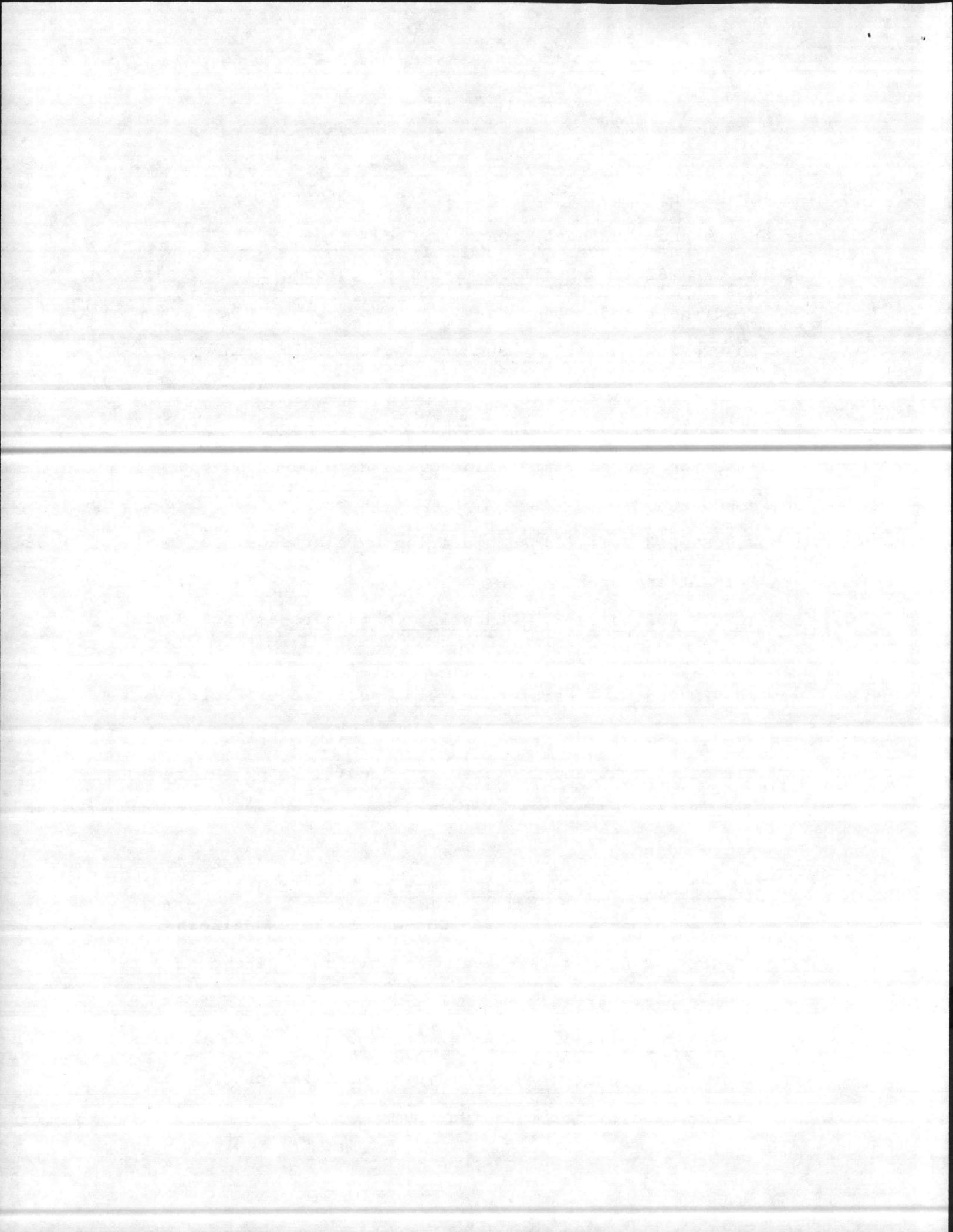
This Consent Agreement does not constitute an admission by USMCB of violation of any statute or regulation; but is rather intended to set forth action already completed in response to certain aforementioned discrepancies, as well as action in process to respond to other aforementioned discrepancies. While this Consent Agreement includes the establishment of schedules for action in process, it does not affect any other issue that may arise between the parties. Therefore, in order to further the public interest and to insure the protection of public health and the environment, USMCB and Branch, by and through their authorized representatives, do enter into the following Consent Agreement and they provide:



ACTION COMPLETED

1. Action has been taken with regard to the following discrepancies and they have been corrected:

- a. 40 CFR 262.21 - Manifest (Required Information) at page 3 of the Inspection Report.
- b. 40 CFR 262.34(a)(1) - Subpart I at page 3 of the Inspection Report. Weekly inspections are being performed at building 909 and inspections of drums of electrolyte solution stored near building 909 have been and are being conducted.
- c. 40 CFR 262.34(a)(2). Accumulation Date at page 3 of the Inspection Report.
- d. 40 CFR 262.34(2)(3) - Labeling Containers at page 3 of the Inspection Report.
- e. 40 CFR 265.31 - Maintenance and Operation of Facility at page 4 of the Inspection Report. The batteries have been turned upright and the discolored soil tested to determine if any hazardous waste has been released. Test results are pending.
- f. 40 CFR 262.42(a) and (b) Exemption Reporting at page 4 of the Inspection Report. Copies of these manifests identified as missing have been obtained. The manifests are properly signed.
- g. Permit Condition - Container Storage at page 4 of the Inspection Report. No containers of hazardous waste are stacked higher than two drums.



2. USMCB agrees to take the following action to prevent the reoccurrence of the discrepancies delineated in paragraph 1 above:

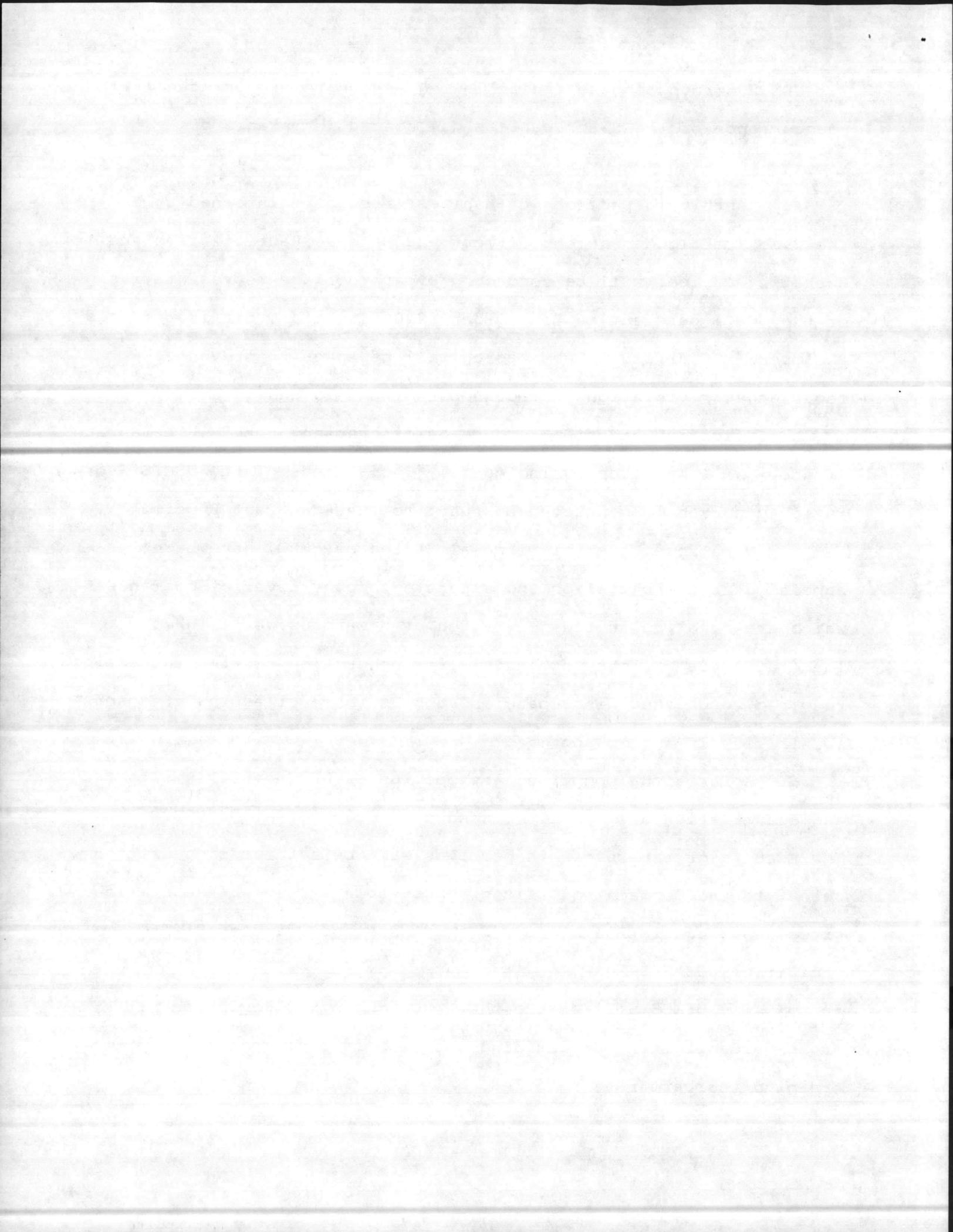
a. Monthly inspections of Manifest records maintained by the Base Traffic Management Officer and Defense Reutilization and Marketing Officer will be conducted by appropriate representatives of the USMCB pursuant to Base Order 6240.5. Said Order is attached as Appendix I hereto. This action will be taken to prevent the recurrence of violations noted in paragraphs 1a and 1f above.

b. Specific attention to type of discrepancy noted in paragraph 1f above will be given during monthly Inspections of the USMCB Storage Facility currently conducted pursuant to the RCRA Part B permit.

c. Hazardous Material Disposal Officers (HMDO) have been appointed at the battalion and separate company level of commands which are involved in the generation of hazardous waste (HW). These officers will be responsible for conducting routine inspections required to prevent discrepancies such as those cited in paragraphs 1b, 1c, 1d, 1e and 1g above.

d. A formal HW compliance inspection of HW generation sites and accumulation areas will be conducted quarterly by USMCB. The results of the formal inspections will be set out in a written report to the Commanding Officer responsible for the HW generation sites and accumulation areas and the Assistant Chief of Staff, Facilities, USMCB.

e. The USMCB will ensure that HMDO and other key personnel are provided initial HW training upon appointment and refresher training thereafter as required.



ACTION IN PROGRESS

3. USMCB agrees to take action with regard to the remaining discrepancies as follows:

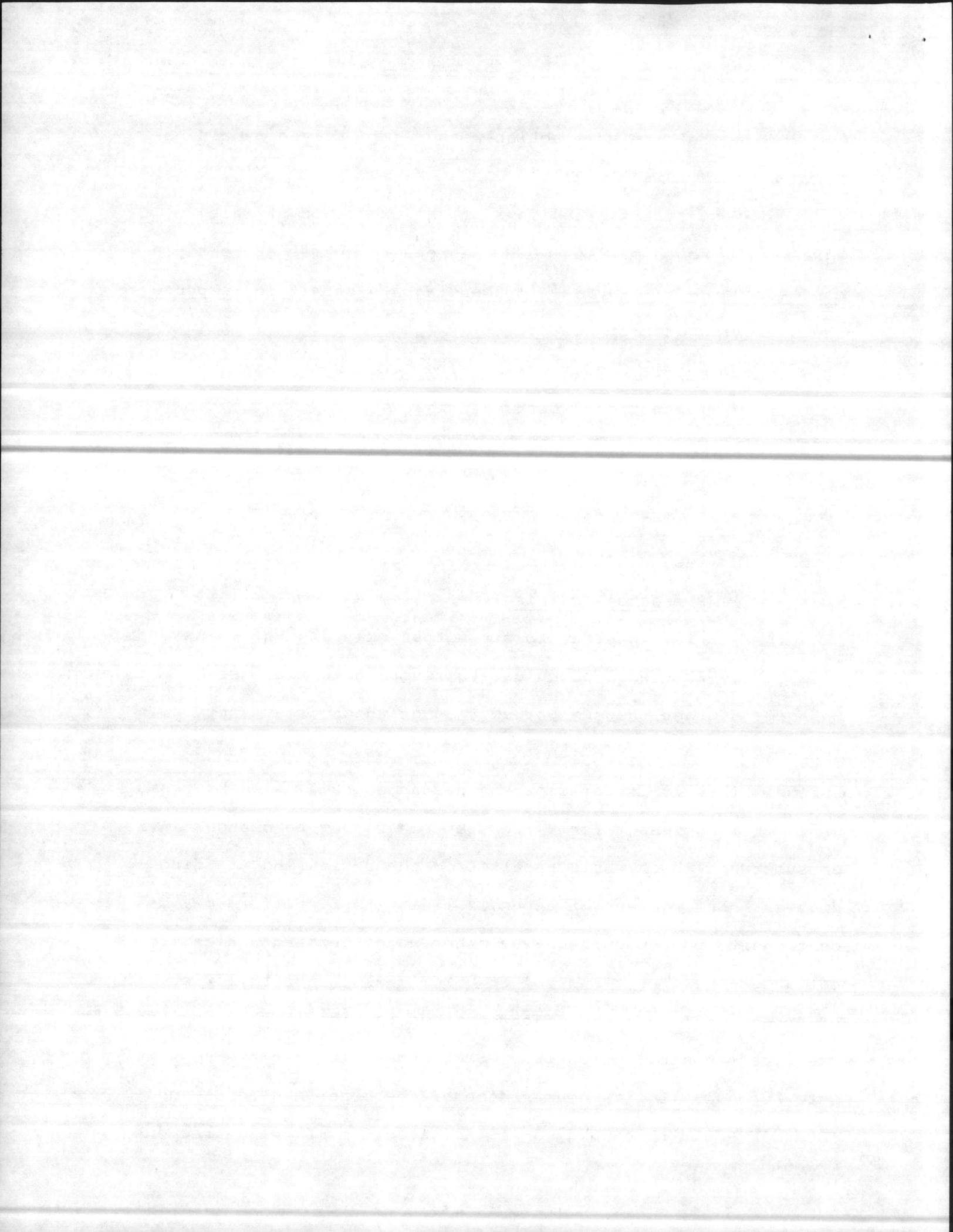
a. Within thirty (30) days of the execution of this agreement by both parties, USMCB agrees to submit appropriate correspondence with a view to amending its permit in response to the following discrepancies:

- (1) Permit Condition - Inspection Log at page 4 of the Inspection Report.
- (2) Permit Condition - Modification at page 5 of the Inspection Report.

b. Within ninety (90) days of the execution of this agreement by both parties, USMCB agrees to take action as follows:

- (1) Personnel Training.

(a) In order to strengthen existing HW training programs, the USMCB will promulgate a revision to the Base HW Management Order the current edition of which is attached as Appendix I. A draft of the proposed revision is attached as Appendix II. It is anticipated that Appendix II will be promulgated in its present form. However, there may be changes in form or substance which would result from the review and staffing process. Enforcement of Appendix II in its final form may be contingent upon concurrence by other major commands which are not under the direct control of USMCB. Also, the review process of Appendix II by other major commands aboard USMCB is not under the direct control of USMCB. USMCB agrees to attempt to promulgate Appendix II with concurrence of the other major commands aboard USMCB within 90 days of the execution of this agreement by both parties.



(b) USMCB will develop a listing of authorized HW generation and accumulation sites. Initial HW orientation training will be scheduled for personnel, to include back-up personnel, at the identified sites pursuant to Appendix II.

(c) Other matters regarding training have been addressed in paragraph 2e above.

(d) The matters addressed in this paragraph are in response to the following discrepancies:

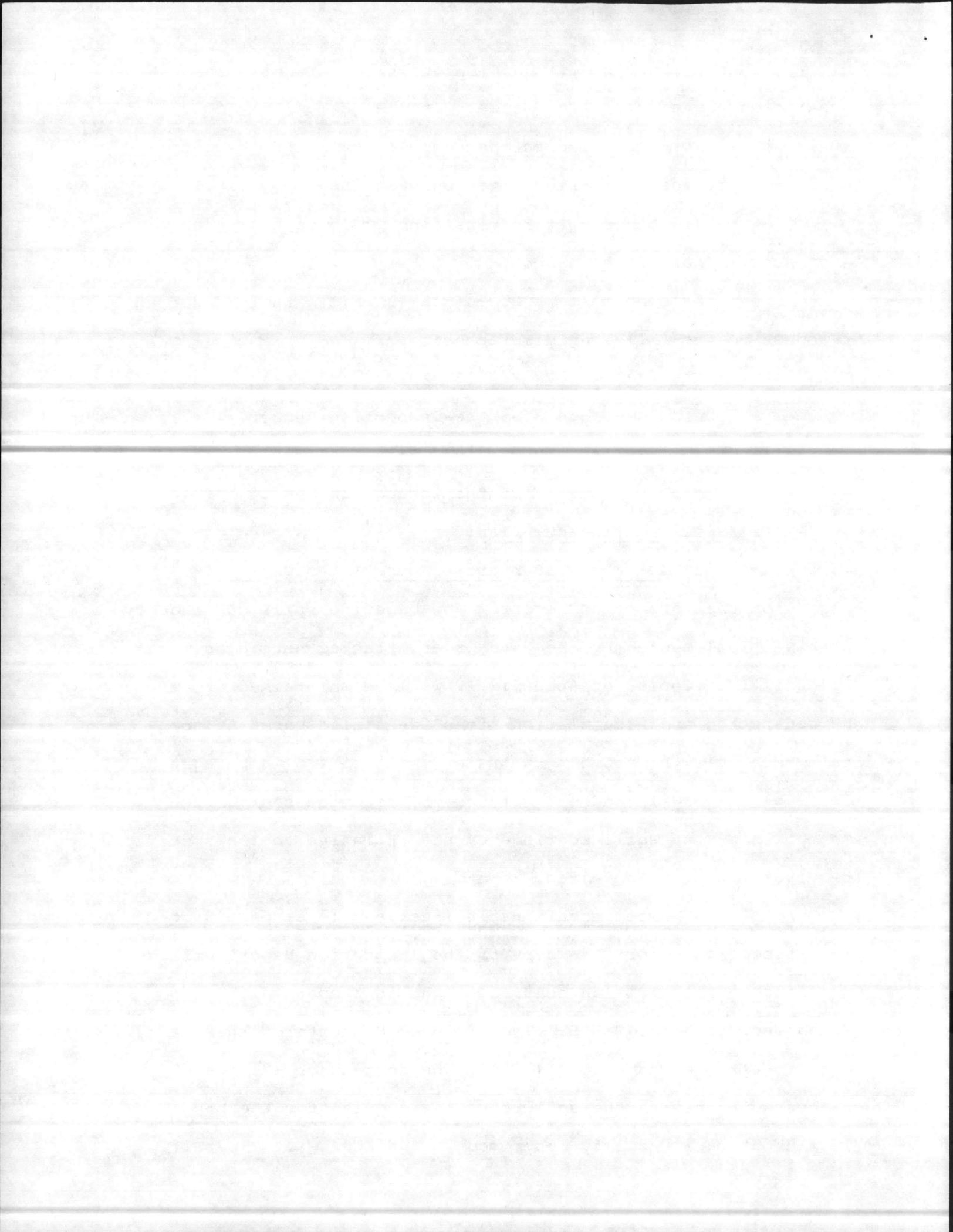
(1) 40 CFR 265.16 - Personnel Training at page 3 of the Inspection Report.

(2) 40 CFR 264.16 - Personnel Training at page 4 of the Inspection Report.

(2) Spill Contingency Plan.

(a) 40 CFR 265 Subpart D - Contingency Plan at page 4 of the Inspection Report. The basewide spill contingency plan was implemented by the Base Order attached hereto as Appendix IV. Copies of Appendix IV will be maintained at all HW generation and accumulation sites identified pursuant to paragraph 3b(1)(b) above. HW training identified in paragraph 3b(1)(b) above will address methods and techniques of implementation of the spill contingency plan relative to the specific requirements of those sites.

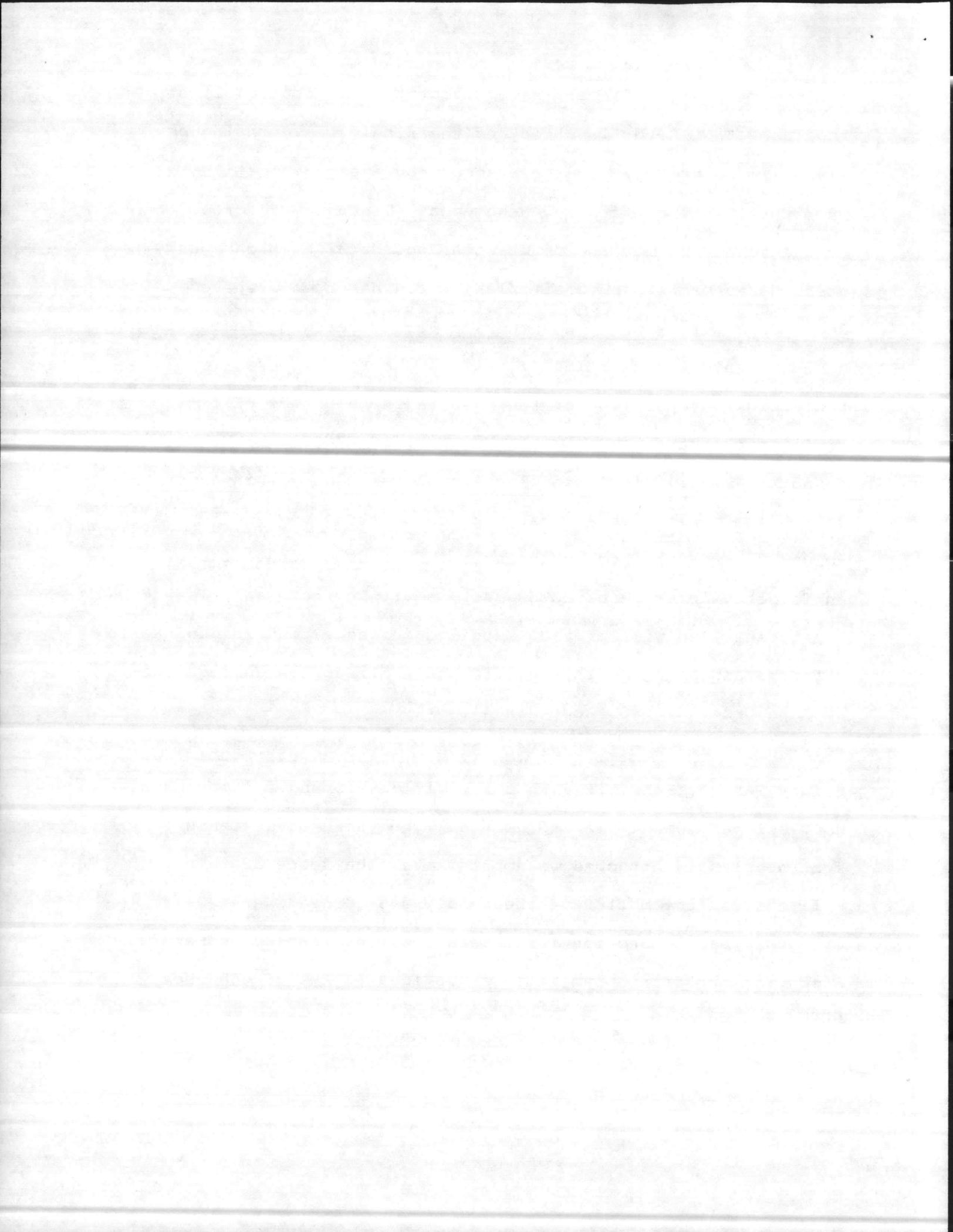
(b) Recommendations in (Section 11) at page 5 of the Inspection Report. A copy of the Inspection Report will be provided to the civilian contractor who is preparing the HW Management Plan for USMCB. The Table of Contents of the draft plan is attached as Appendix III. The contractor will be requested to revise the spill contingency plan for the Long Term HW Storage Facility described in the RCRA Part B permit.



The revision will address issues identified in Section 11 of the Inspection Report. A copy of the final spill contingency plan will be provided to the Branch upon its promulgation.

(c) Draft HM/HW Management Plan. USMCB agrees to expeditiously review the draft Hazardous Material/Hazardous Waste Management Plan (draft plan) which has been prepared under contract by Environmental and Safety Designs, Inc. with a view toward promulgation of the plan as soon as practicable. Since final preparation of the plan is in the hands of a civilian contractor outside the control of USMCB, the USMCB cannot guarantee final promulgation of the plan within ninety days. The cover page and table of contents of the draft plan, volume 2, are attached as Appendix III to demonstrate the anticipated coverage of HM/HW matters within the plan. The HM/HW Management Plan will provide detailed guidance to Hazardous Waste Officers and Managers in execution of their duties as required by Base Order 6240.5 (Appendix I).

(3) Waste Oil Mangement Plan. Environmental and Safety Designs, Inc. is also currently developing a comprehensive used oil management plan for USMCB. The table of contents for the plan is attached as Appendix V. The scope of this plan will address the matter of the handling of contaminated waste oil described in Section 11 at page 5 of the Inspection Report. A copy of the final plan will be provided to the Branch upon promulgation.



OTHER TERMS AND CONDITIONS

4. USMCB will submit monthly written status reports which will briefly summarize all action in progress which is completed during the month covered by said report. The first status report will be submitted within thirty-five (35) days following the execution of this agreement by both parties. The report will be prepared by the Director, Natural Resources and Environmental Affairs Division, USMCB, Mr. Julian I. Wooten at (919) 451-2083.

5. The Branch will perform necessary oversight and review activities which may include inspections of USMCB facilities and records upon reasonable notice to Mr. Julian Wooten at (919) 451-2083.

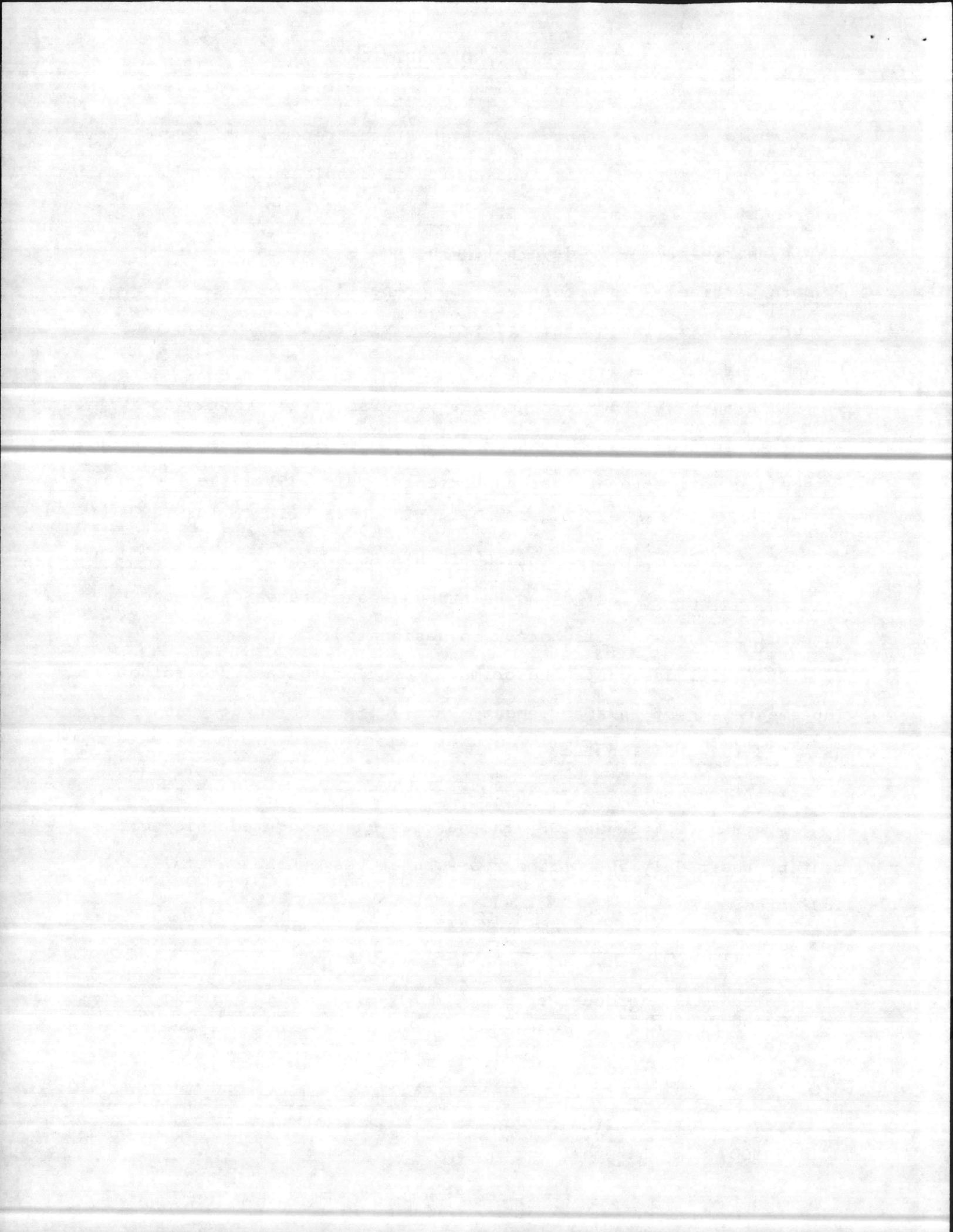
6. The Branch will designate one person as the primary point of contact regarding implementation of this agreement. _____, Solid and Hazardous Waste Branch, at phone number (919) ____-____ is hereby so designated.

7. USMCB will designate one primary point of contact regarding implementation of this agreement. Mr. Julian Wooten at (919) 451-2083 is so designated.

IN WITNESS WHEREOF, the parties have executed this agreement by their duly authorized representatives on the date(s) indicated.

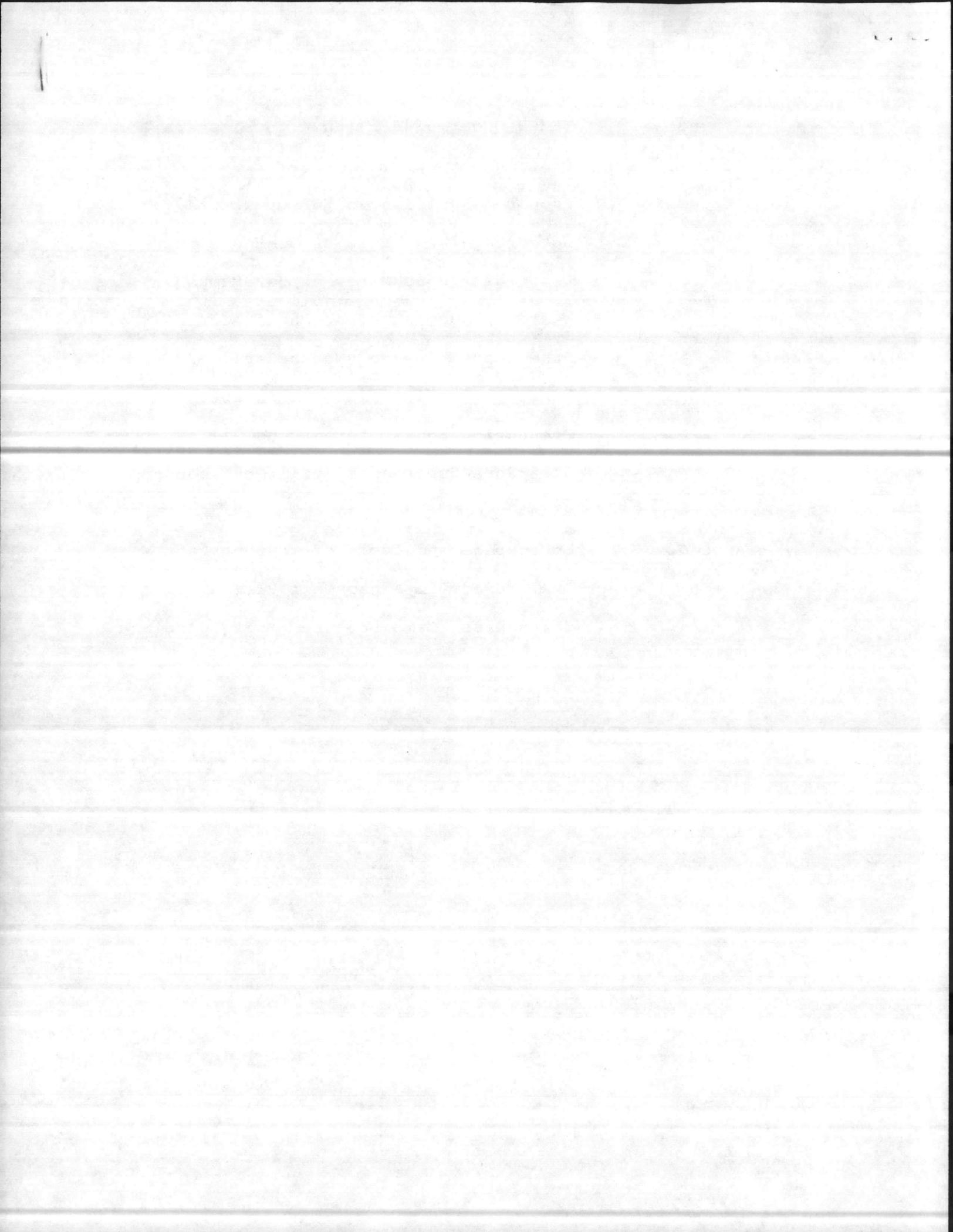
By: _____ date
Solid and Hazardous Waste
Management Branch

By: _____ date
Colonel T. J. Dalzell
Assistant Chief of Staff, Facilities
USMCB, Camp Lejeune, North Carolina



Attachments:

- Appendix I: USMCB Order 6240.5 (Hazardous Material Disposal Program)
- Appendix II: Proposed Revision to MCB Order 6240.5
- Appendix III: Cover page and Table of Contents to Draft Hazardous Material/Hazardous Waste Management Plan, Marine Corps Base, Camp Lejeune, North Carolina, v2.
- Appendix IV: USMCB Order 11090.1B (Oil Pollution Prevention and Abatement and Oil other Hazardous Substances Spill Contingency Plan)
- Appendix V: Cover page and Table of Contents to Draft Used Oil Management Plan, Marine Corps Base, Camp Lejeune, North Carolina



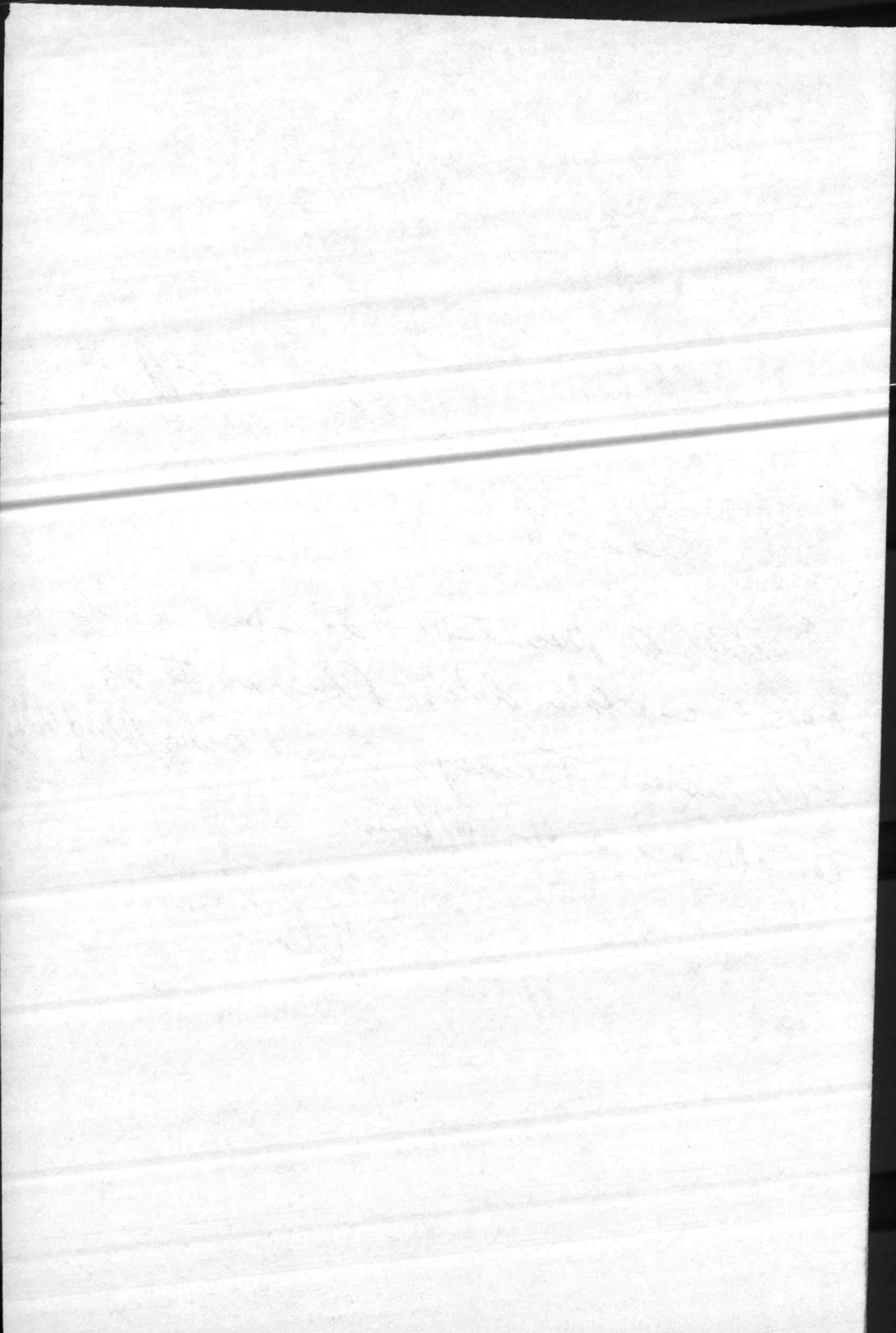
NATURAL RESOURCES AND ENVIRONMENTAL AFFAIRS
Marine Corps Base
Camp Lejeune, North Carolina 28542

25 Aug 82
Date

From: Director
To: *Record*
Subj:

*attached presented to & discussed with
AC/S For this date. Plans are to get
STA review Tuesday. Consent Order, Notice of Violation
Compliance order w/ fines.*

Julian

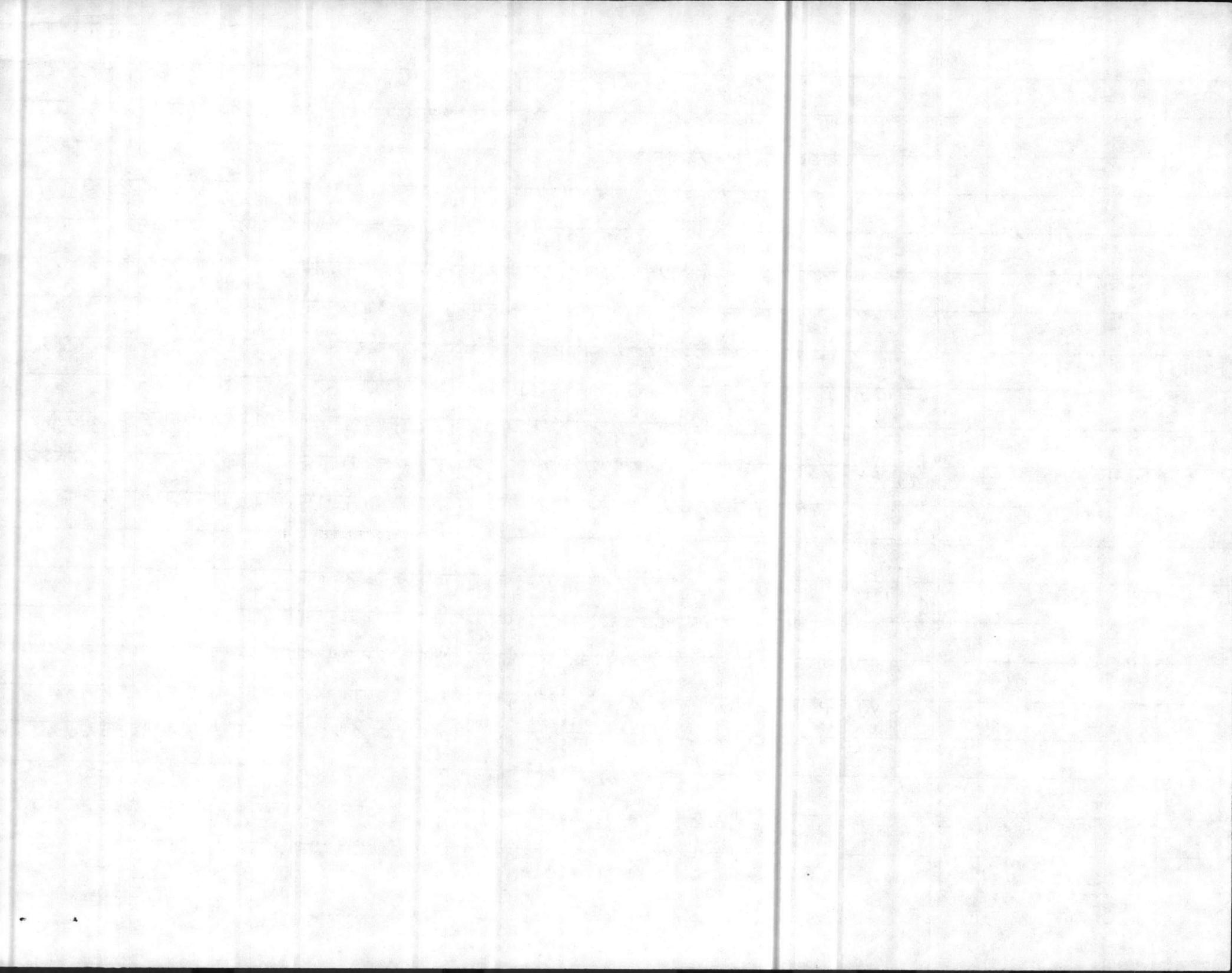


SPECIFIC VIOLATIONS
OF HW REGULATIONS
14AUG86 EPA REPORT

PROPOSED ACTIONS TO BE
TAKEN TO PROVIDE COMPLIANCE
WITH REGULATIONS

BASE PROPOSAL FOR
DATE COMPLIANCE WILL
BE ACHIEVED

SPECIFIC VIOLATIONS OF HW REGULATIONS 14AUG86 EPA REPORT	PROPOSED ACTIONS TO BE TAKEN TO PROVIDE COMPLIANCE WITH REGULATIONS	BASE PROPOSAL FOR DATE COMPLIANCE WILL BE ACHIEVED
<p>1. Hazardous Waste (HW) manifest</p> <p>40CFR 262.21</p> <p>Failure to enter generator ID # on 28F686 manifest</p>	<p>Corrective action has been taken. Two offices have responsibility for HW manifest preparation at Camp Lejeune, the Traffic Management Office (TMO) and the Defense Reutilization and Marketing Office (DRMO). Both TMO and DRMO have been requested to take action to prevent recurrence of the violations. Base environmental personnel will monitor compliance monthly.</p>	<p>1 October 1986</p>
<p>2. Discrepancies at HW Generation Sites</p> <p>40CFR 262.34(A)(1) Subpart I weekly inspections.</p> <p>40CFR 262.34(A)(2) No Accumulation Date</p> <p>40CFR 262.34(A)(3) Improper Container Labeling</p> <p>40CFR 262.34(A)(4) Personnel HW Training</p> <p>40CFR 262.34(A)(4) maintenance and operation of facility</p>	<p>a. A Base message will be published emphasizing proper procedures for handling/disposal of used batteries/electrolyte.</p> <p>b. Special HW Officers will be appointed at the Battalion/Separate Company level (or equivalent) to enforce regulations regarding these discrepancies, specifically HW Training.</p> <p>c. A revised Base instruction will be published which strengthens responsibilities for HW management and formalizes/improves HW Training plan/program.</p> <p>d. Work sites routinely generating HW will be identified and will be inspected once by Base environmental staff. Annual HW inspections by Base environmental staff will be required.</p> <p>e. Weekly inspections of each HW storage area will be conducted by generator per HW regulations of</p>	<p>90 days from date of consent order</p>

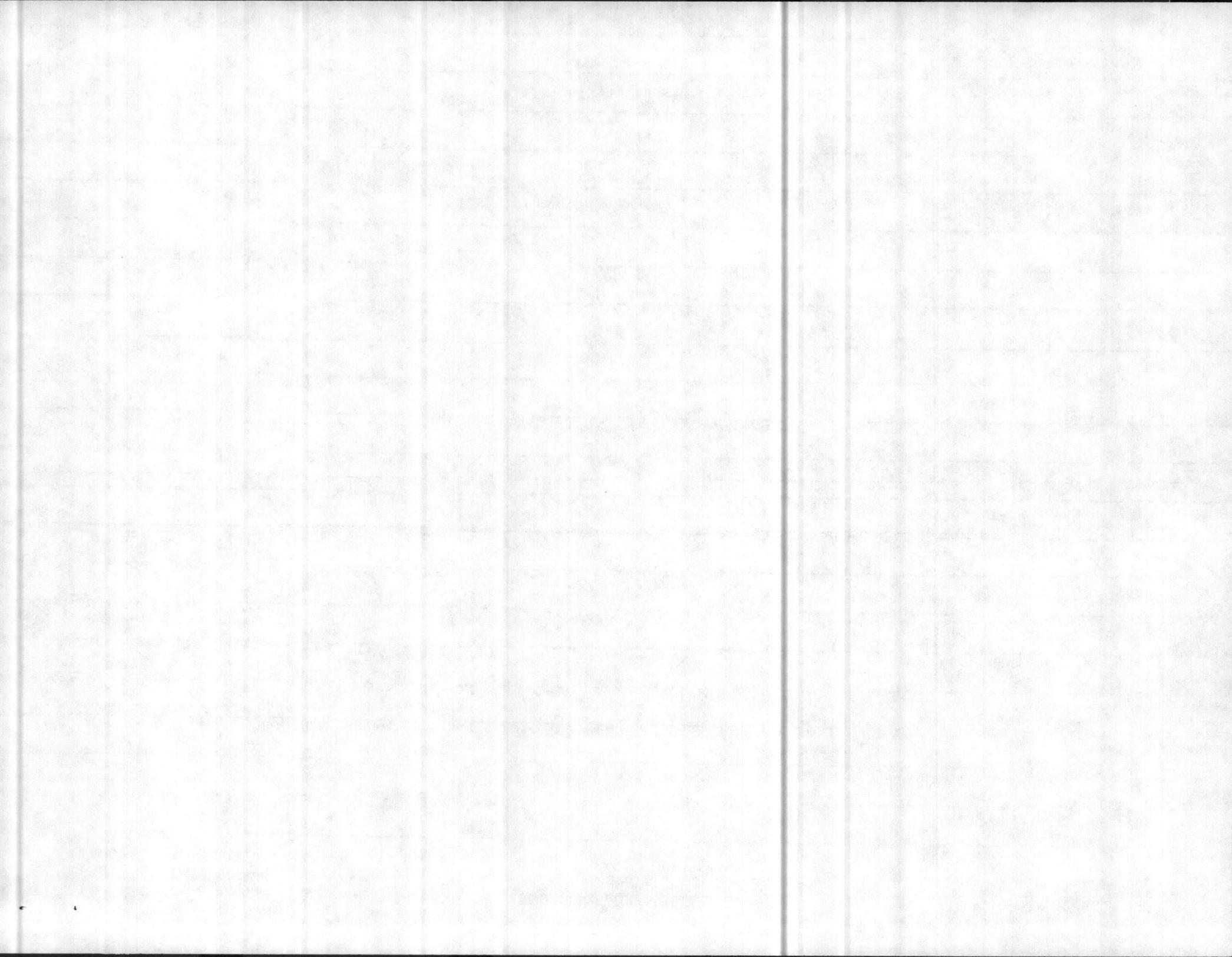


SPECIFIC VIOLATIONS
OF HW REGULATIONS
14AUG86 EPA REPORT

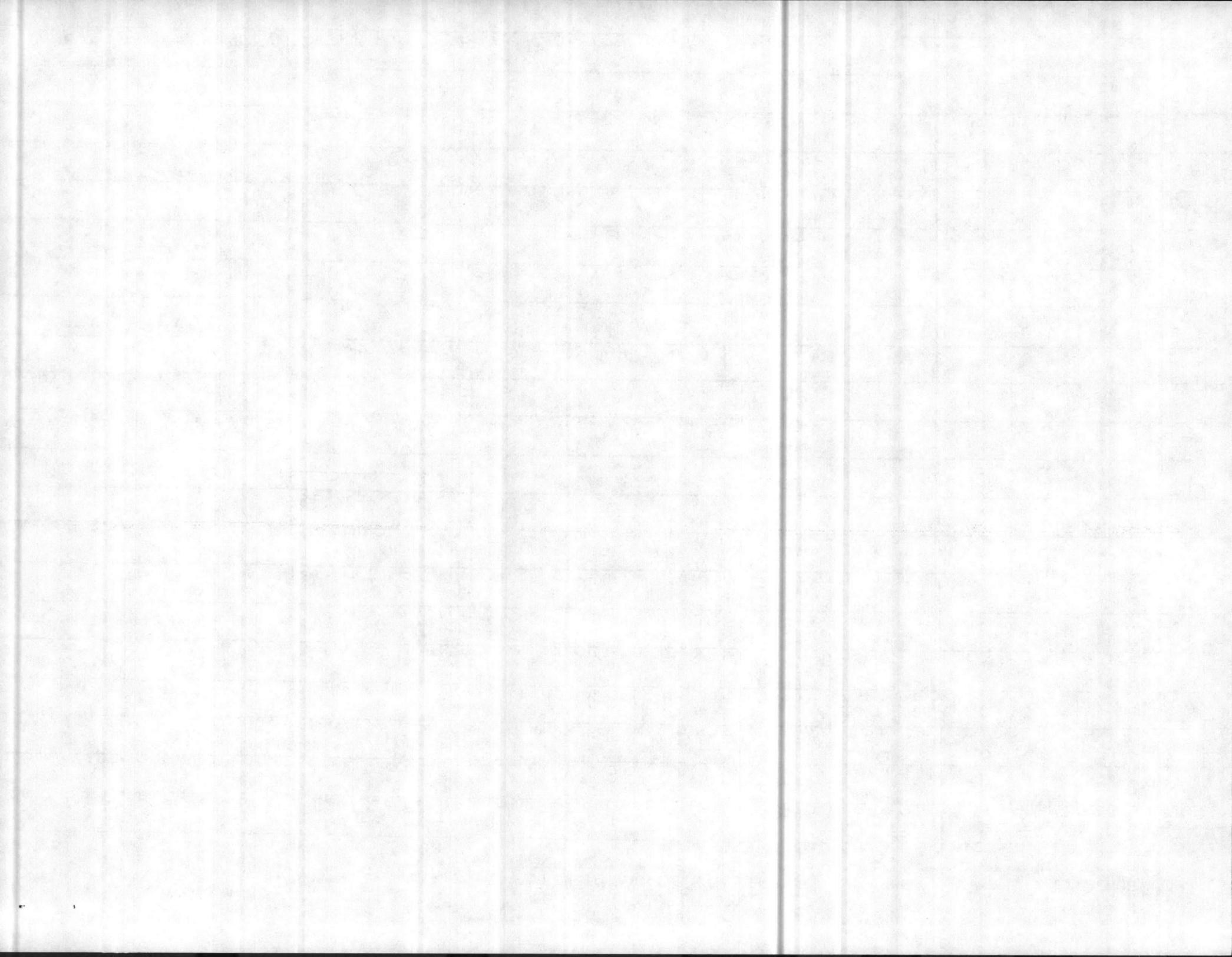
PROPOSED ACTIONS TO BE
TAKEN TO PROVIDE COMPLIANCE
WITH REGULATIONS

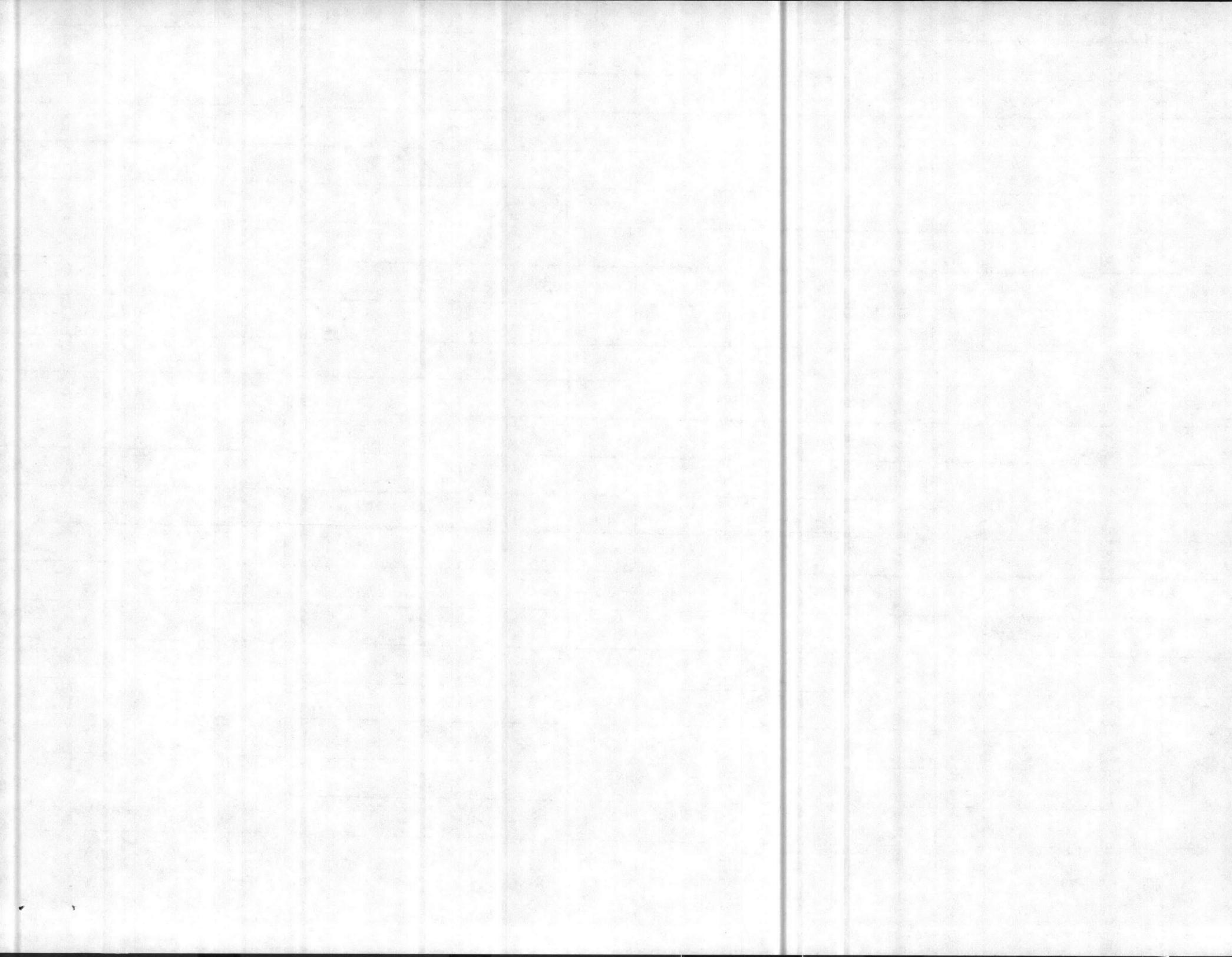
BASE PROPOSAL FOR
DATE COMPLIANCE WILL
BE ACHIEVED

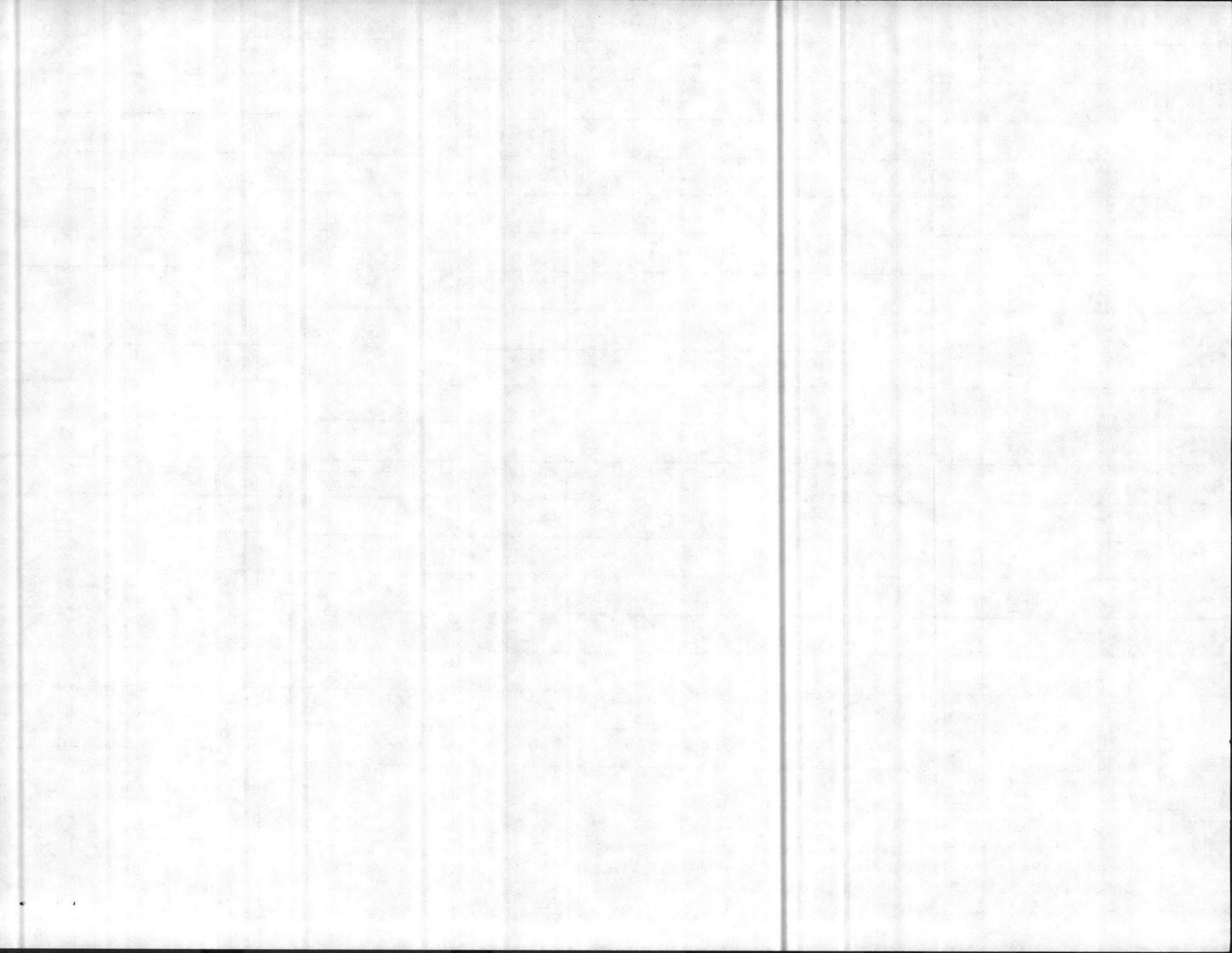
SPECIFIC VIOLATIONS OF HW REGULATIONS 14AUG86 EPA REPORT	PROPOSED ACTIONS TO BE TAKEN TO PROVIDE COMPLIANCE WITH REGULATIONS	BASE PROPOSAL FOR DATE COMPLIANCE WILL BE ACHIEVED
3. CFR 262.34(a)(4)	a. Although Camp Lejeune does not concur with EPA findings that No spill contingency plans were provided provided at HW generation sites, The following action will be taken to improve spill prevention and response at the work sites. (1) Each site will be required to have a written procedure which clarifies personnel's responsibilities for implementation, B011090.1B which is Base Contingency Plan. (2) Base Fire Department Inspectors will place special emphasis on this matter and will check each HW generation site for compliance with this requirement on a routine schedule	90 days from date of Consent order
40CFR 265 Subpart D spill prevention and spill contingency plan at HW generation and accumulation sites.	b. Provide a copy of the 14 August 1986 EPA report to ENSAFE, a private contractor who is presently revising the Base HW Spill Control and Countermeasures Plan. The contractor will be requested to address EPA findings in their project.	

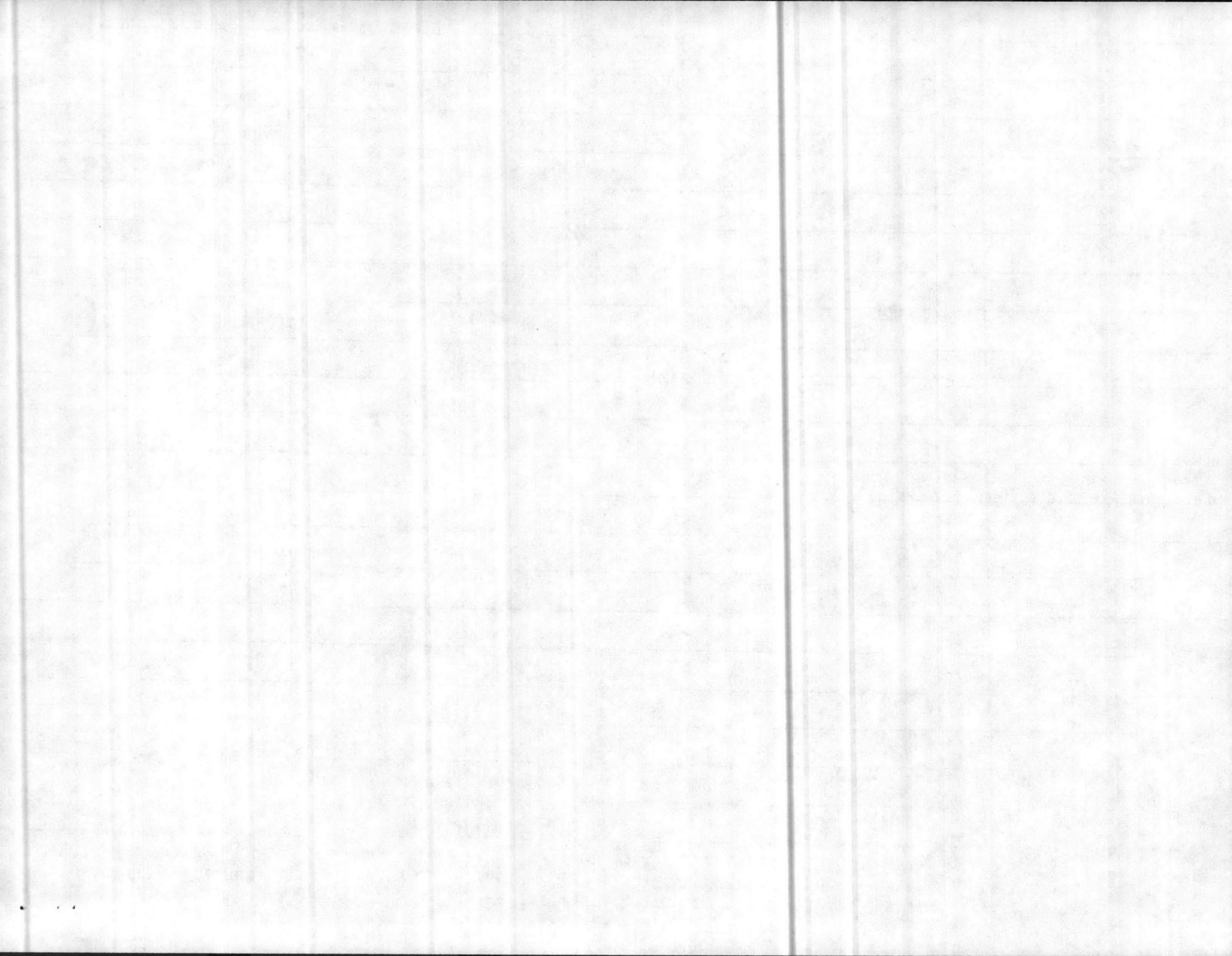


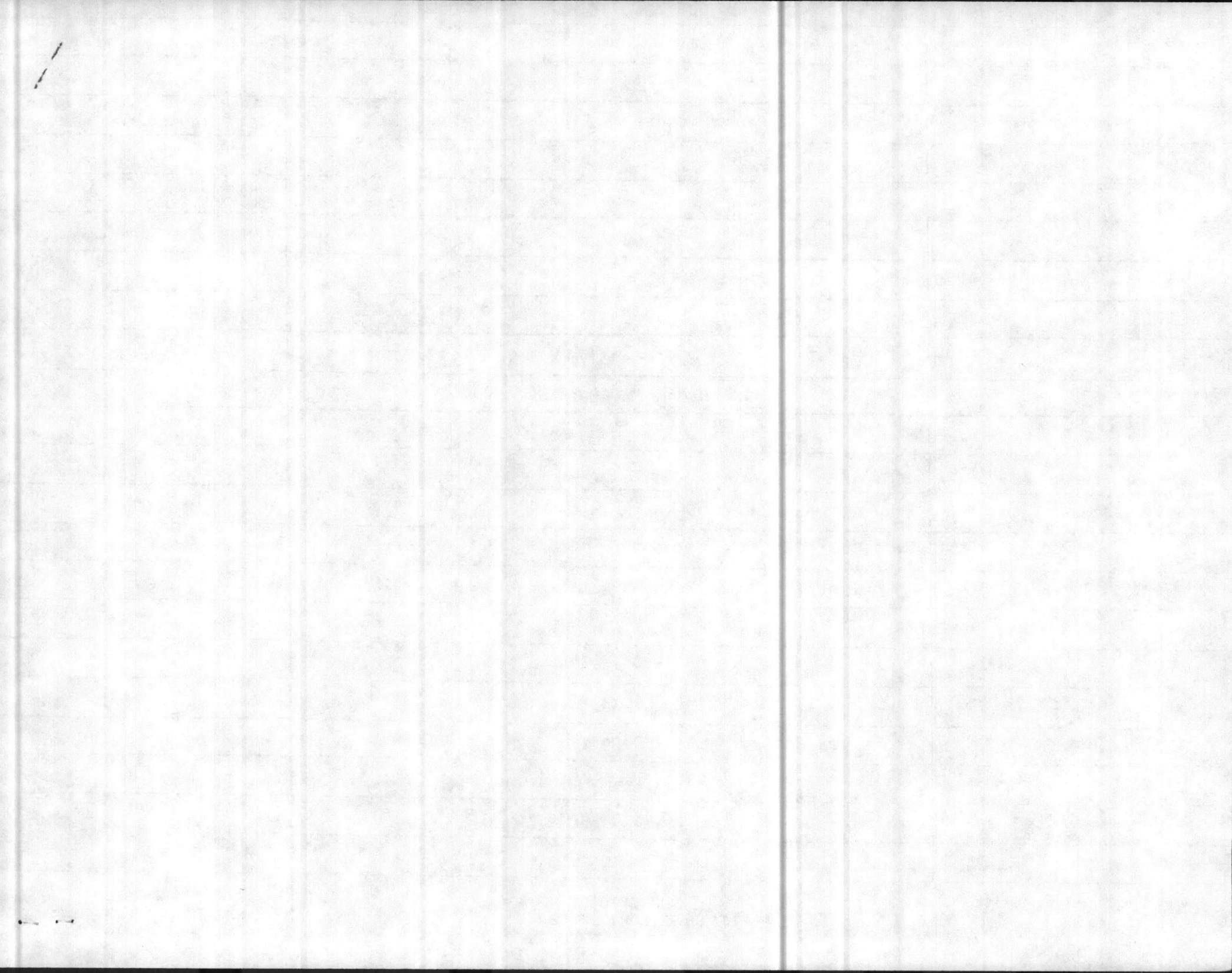
SPECIFIC VIOLATIONS OF HW REGULATIONS 14AUG86 EPA REPORT	PROPOSED ACTIONS TO BE TAKEN TO PROVIDE COMPLIANCE WITH REGULATIONS	BASE PROPOSAL FOR DATE COMPLIANCE WILL BE ACHIEVED
4. 40CFR 262.42(a)+(b) Exception reporting	Defense Reutilization and Marketing Office (DRMO) AND Base Traffic Management Officer (TMO) have been advised to closely monitor all HW shipments to ensure compliance. Natural Resources and Environmental Affairs Director will perform monthly compliance checks of DRMO + TMO records. The six Safety Kleen manifests cited in EPA report were apparently sent to wrong local address. These have been located.	1 October 1986
5. Discrepancies AT Long- Term HW storage facilities	a. North Carolina Solid and Hazardous waste management Branch will be provided written notification of inspection log and name changes	1 October 1986
Permit condition Inspection log	b. DRMO operator has been advised not to stack containers over equivalent to two barrels high. NREAD will inspect compliance monthly	1 October 1986
Permit condition Name changes	c. DRMO has been requested to review HW duty assignments and take action to update position descriptions and training records to reflect current situation.	90 days from date of Consent Order
40CFR 264.52+264.56	d. Containment Plan will be revised (Sec 3 b).	90 days from date
Container Plan		











From: Director, Natural Resources and Environmental Affairs
Division, Marine Corps Base, Camp Lejeune

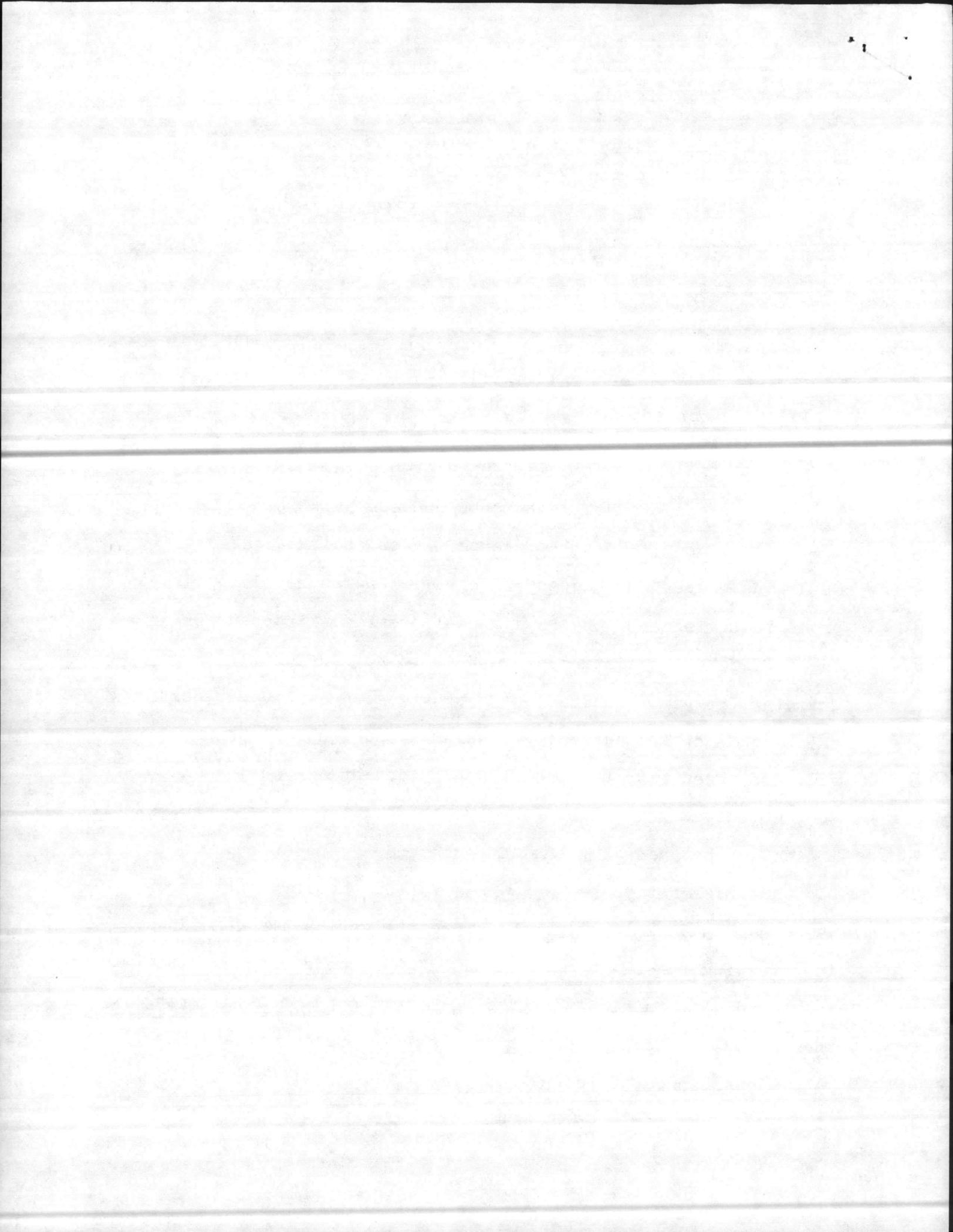
To: Assistant Chief of Staff, Facilities

Subj: ENVIRONMENTAL PROTECTION AGENCY (EPA) ON SITE INSPECTION
OF 26 AND 27 JUNE 1986

Ref: (a) BO 6240.5
(b) FONECON between Mr. Jerry Rhodes, DHS, and Mr. Danny
Sharpe, NREAD of 19 Aug 86

Encl: (1) Proposed BO 6240.5A
(2) AC/S, MCB ltr 6240/NREAD of 25 APR 86
(3) EPA ltr (ALLAN E. ANTLEY) 4WD-RM of 14 Aug 86

1. The purpose of this memo is to provide NREAD comments on the subject inspection. Reference (a) established the activity Hazardous Waste (HW) Disposal Program. Enclosure (1) provides proposed revision of the HW disposal program. Enclosure (2) identified action initiated by NREAD to upgrade existing HW Training Program. Enclosure (3) provides EPA written report on the subject inspection. In NREAD's opinion, enclosure (3) accurately reflects the outbrief provided by EPA during the subject inspection. During reference (b), the State Representative indicated that he was going to recommend a consent order. The State Representative has requested a telephonic notification by 26 Aug 1986 as to proposed corrective action and deadlines. In reviewing the EPA comments and NREAD responses below, it should be kept in mind that the military shops visited during the subject inspection have historically done one of the better jobs of personnel training and record keeping within military organizations within Camp Lejeune.



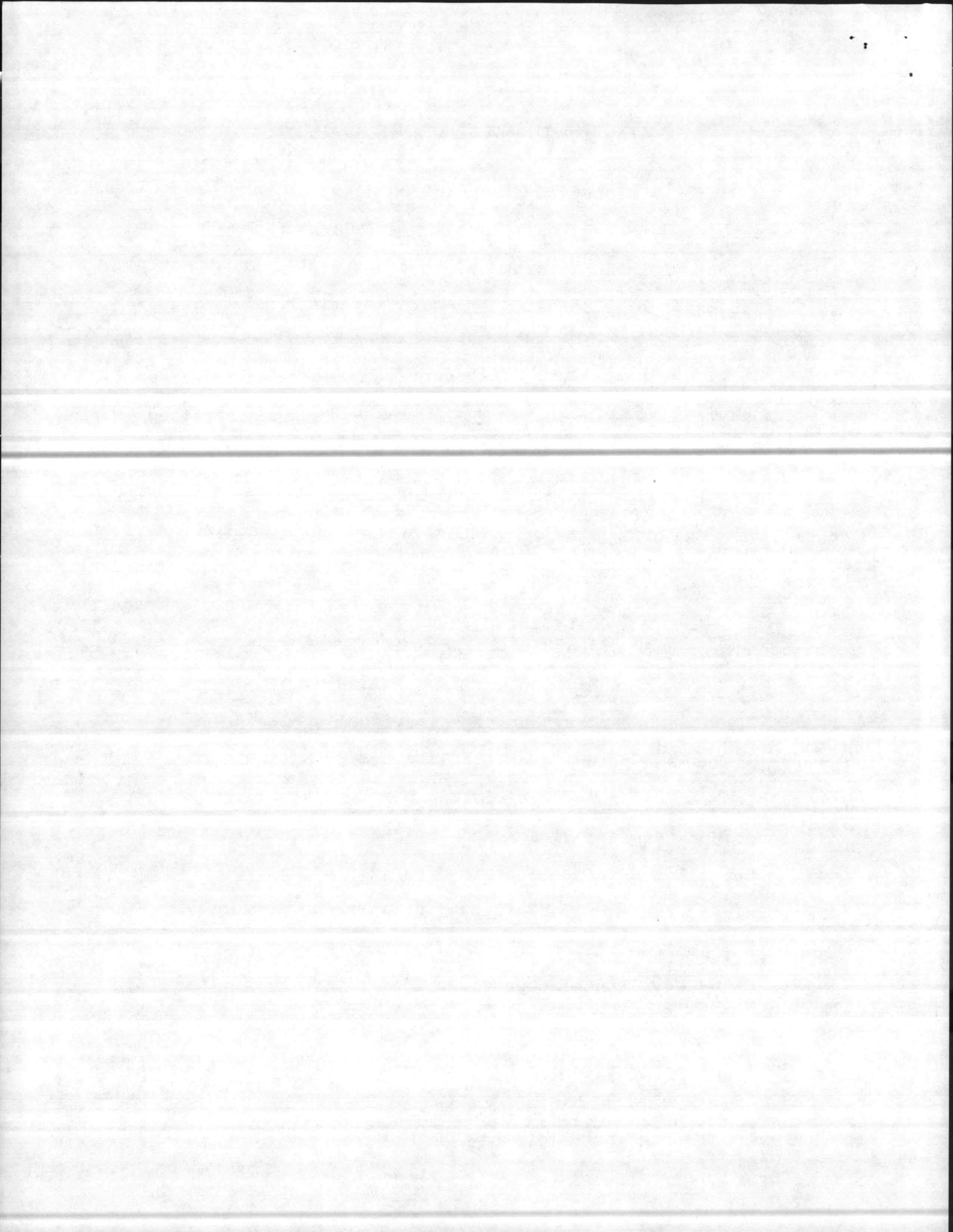
2. EPA Conclusions

" The condition of containers and the handling of hazardous waste at the permitted storage buildings was excellent. The USMC has several minor violations that need to be corrected for the permitted site. The major problems at the generating sites is the constant change of personnel. Due to constant change of personnel, it is difficult to adequately train the Marines. The USMC have been exploring the possibilities of increasing the number of sites where a contractor would be servicing the various locations solvents are used. Some problems may be eliminated if a contract handles the the solvents. Another major problem the USMC has had is that solvents have been detected in the waste oil. If solvents continue to be detected in the waste oil, then the facility would be required to obtain a permit or handle the waste as a generator."

NREAD Response: Concur. The following comments are provided:

(1) The priority that organizational commanders place on proper management of HW is critical to achieving compliance with HW regulations. The proposed revision to reference (a) contained in the enclosure sets up primary and alternate HW management officers at the Battalion, Marine Aircraft Group and separate Company level. When trained, these collateral duty officers should be able to coordinate implementation of the requirements of reference (a). The proposed revision also provides for written HW SOP's and tasks all organizations to develop and implement internal controls including disciplinary action.

(2) The management of waste oil continues to be a serious problem. The ongoing HW management/used oil study being conducted for the base through LANTDIV contract no. N62470-85-B-7979 by Environ-

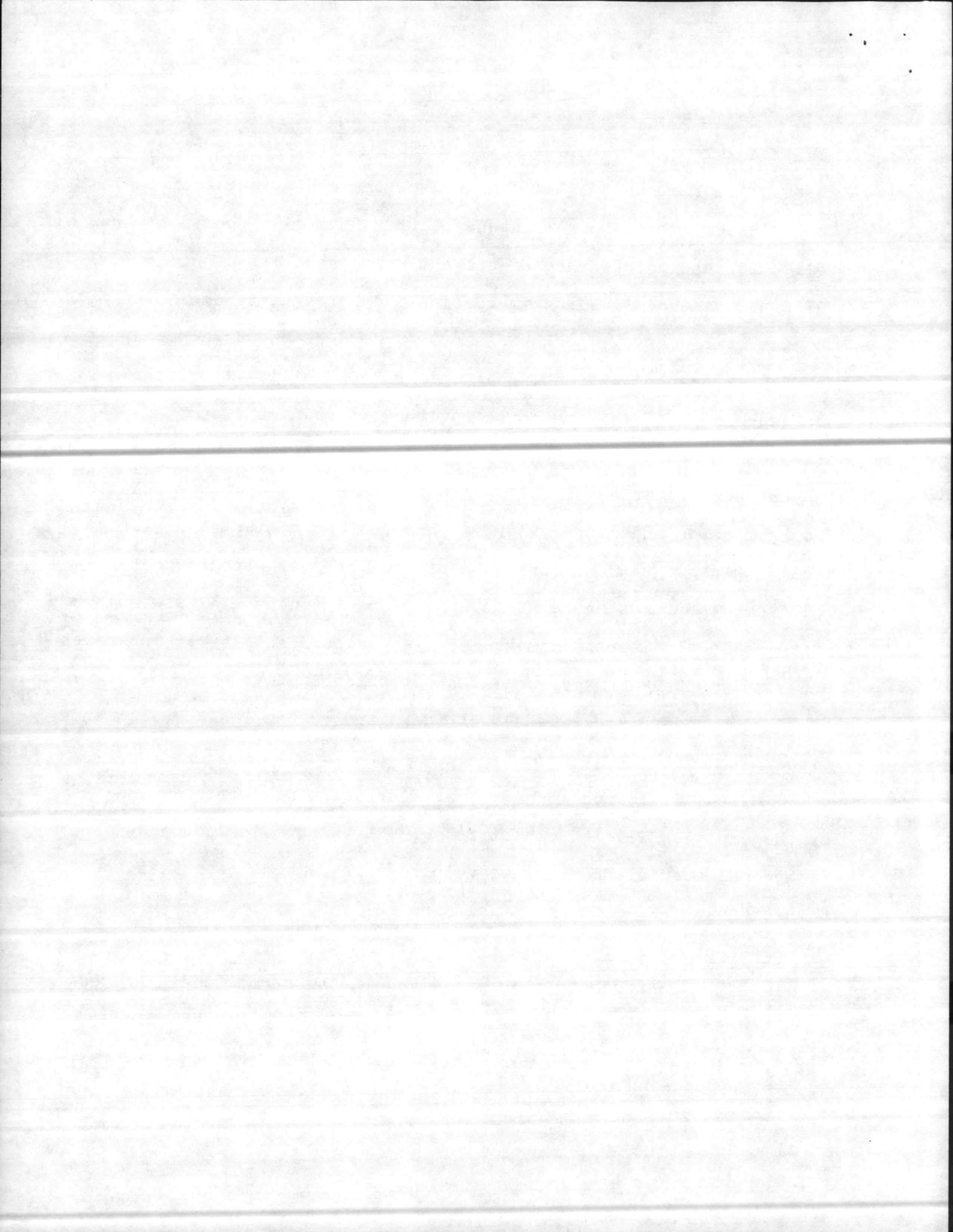


mental and Safety Designs, Inc. (ENSAFE) has produced draft recommendations in this area. The most important recommendation is that a qualified used oil administrator be appointed within the Utilities Branch of Base Maintenance to manage all aspects of used oil collection and maintenance of oil pollution abatement facilities. NREAD has made similar recommendations to Base Maintenance over the past two years. The Roads and Grounds Section of Maintenance and Repair Branch, currently has this responsibility. Despite what appears to be a very conscientious effort on the part of Roads and Grounds to carry out this important function, program management has not been satisfactory. It is NREAD's opinion that the Utilities Branch mission and staff expertise ensures capability to properly manage this program. Supervision of this program appears to be a full time job for a person with experience in industrial wastewater/waste collection, pretreatment and disposal and ability to interpret and comply with the many regulations applicable to the program. NREAD recommends immediate action in regard to the ENSAFE recommendations.

(3) It is recommended that a HW training committee chaired by the Employee Development Director, CPD, with major command Hazardous Material Disposal Coordinators as members be established to coordinate HW Training. Enclosure (2) pertains.

3. EPA Recommendations

"The contingency plan presented in the permit and approved when the permit was issued fails to address adequately all items that should be addressed. It is recommended that the contingency plan be revised to address the following comments:



(1) - Pursuant to 40 CFR 264.52(e), the contingency plan should include a list of emergency equipment at the facility, the location of this equipment and a physical description of each item on the list, and a brief outline of its capabilities.

(2) - Pursuant to 40 CFR 264.52(f), the contingency plan should include an evacuation plan for facility personnel where there is a possibility that evacuation could be possible.

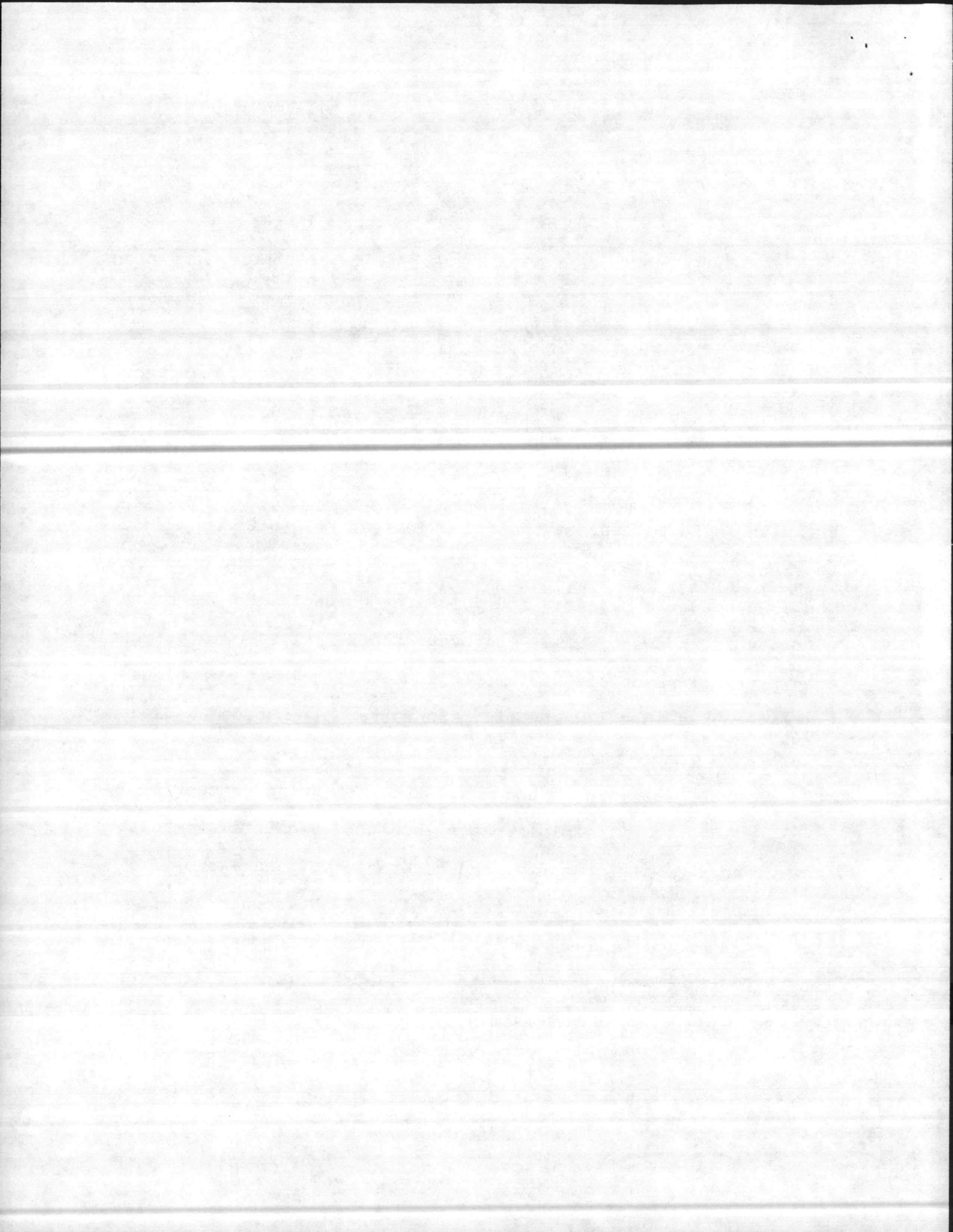
(3) - The contingency plan should outline the emergency procedures that will be followed as required in 40 CFR 264.56. The base contingency plan needs to be revised to outline in more detail the emergency procedures taken for an emergency. Specifically, the plan fails to address the following parts: 40 CFR 264.56(d), (e), (h), (i) and (j).

The USMC needs to research and determine how solvents are being detected in the waste oil. The State and EPA will be investigating the waste oil practices at Camp Lejeune. If solvents continue to be detected in the waste oil, the waste oil must be handled as a hazardous waste."

NREAD Response: Concur with the following comments:

(1) Used oil administrator should be appointed immediately (see 2b above) with authority and resources to manage program. This manager, in close coordination with NREAD, should develop a used oil segregation program to include publishing base order; budgeting/procurement required to provide satisfactory equipment and facilities; and establishment of an enforcement strategy.

(2) Regarding the contingency plan, it is recommended that ENSAFE be provided a copy of EPA letter and requested to ensure that their HM spill SPCC plan addresses spill contingency issues.



4. EPA Comment: 40 CFR 262.21 - Manifest (Required Information)
On the February 28, 1986, manifest, no generator ID number was used as required.

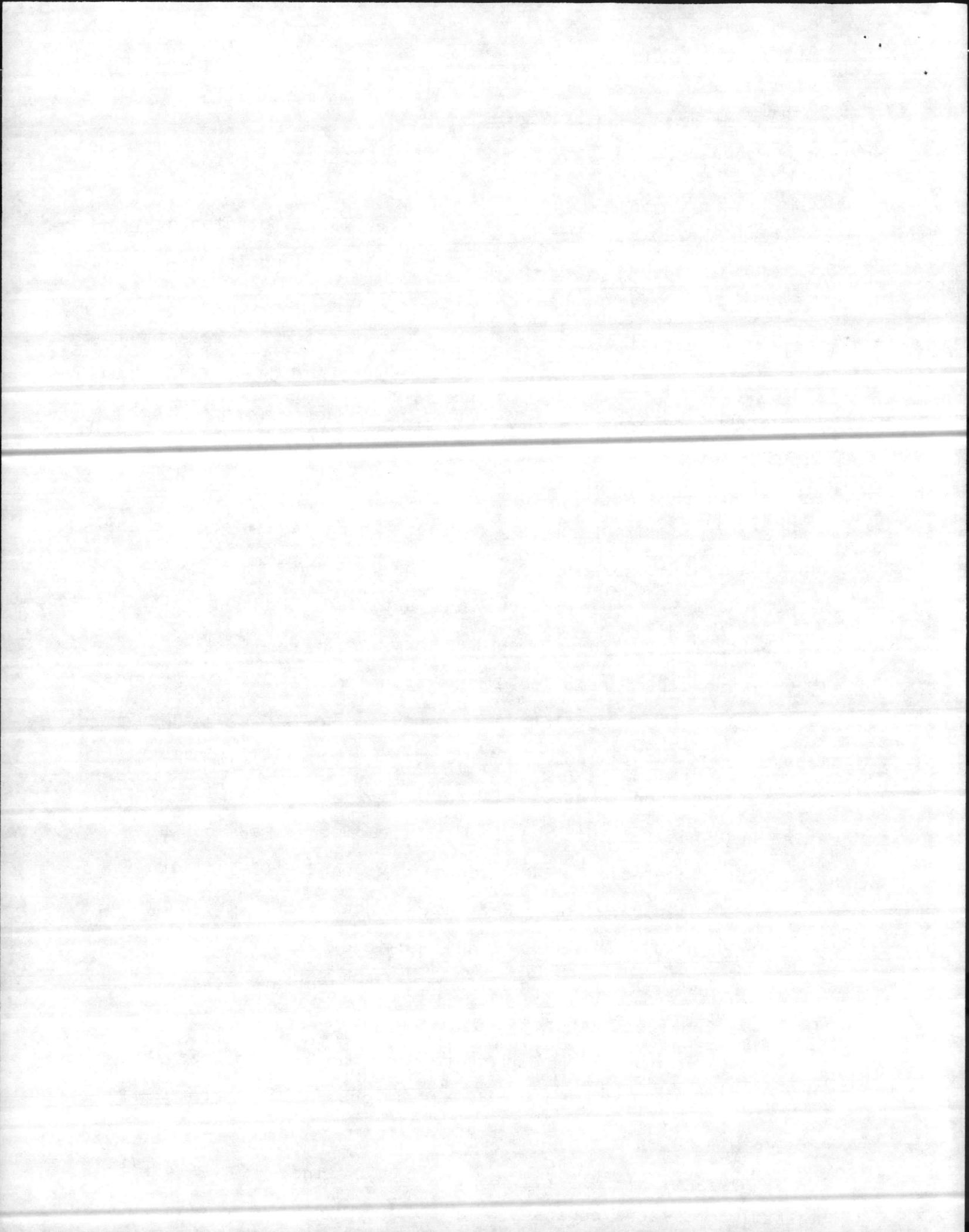
NREAD Response: Concur. DRMO has corrected discrepancy. NREAD monthly inspections will check continued compliance.

5. EPA Comment: 40 CFR 262.34(a)(1) - Subpart I. This Section requires the facility to comply with Subpart I. The facility has failed to comply with Subpart I, specifically 40 CFR 265.174. At building 909, weekly inspections have not been performed. No inspections were performed for drums of electrolyte solution stored near building 909.

NREAD Response: Partially Concur. Inspections were not performed due to the absence of key personnel. ^{There} ~~is~~ is a question whether comments on electrolyte are justified. NREAD's opinion is that EPA interpretation of requirements for handling batteries/electrolyte differ from local understanding of guidance provided previously by State regulatory personnel. However, subsequent study of problem, including consultation with ENSAFE, indicates that EPA interpretation is appropriate. A message will be issued to revise guidance for battery/electrolyte disposal as soon as procedures acceptable to DRMO can be developed. DRMO is in process of consulting their Regional Headquarters. It should be noted that ENSAFE is recommending turn-in of electrolyte to DRMO vice local neutralization and discharge to sanitary sewer. See 6. and 8 below. NREAD would strenuously nonconcur with any subsequent proposal by state to fine the base for past battery acid handling relative to situations discussed above at building 909.

6. EPA Comment:

a. 40 CFR 262.34(a)(3) - Labeling Containers. The facility has failed to label containers of electrolyte solution from batteries



with the words "hazardous waste."

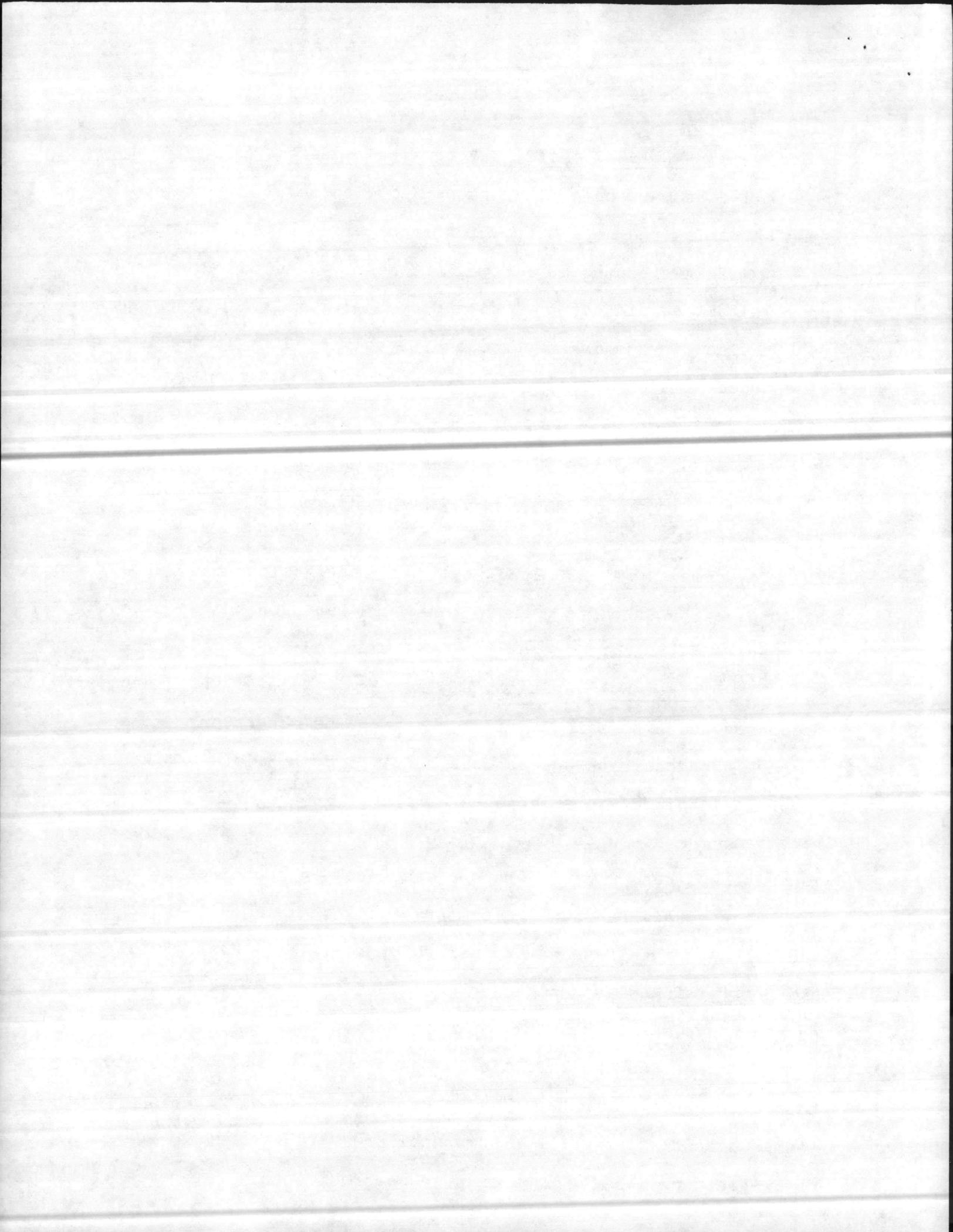
6. 40 CFR 262.34(a)(2) - Accumulation Date. The facility has failed to mark on each container of electrolyte solution from batteries the date upon which each period of accumulation begins.

NREAD Response: Partially Concur. Base had interpreted previous state guidance to indicate that electrolyte did not require labeling/dating since electrolyte was being neutralized and discharged to a permitted waste treatment plant. In that, the military units were in compliance with local guidance, they should not be giggered for these specific discrepancies. Message discussed in 5b above will address this item. See no reason [REDACTED] to rebutt EPA comment.

7. EPA Comment: 40 CFR 262.34(a)(4). The facility has failed to comply with Subparts C and D in 40 CFR Part 265 and with 265.16 as specifically stated below:

40 CFR 265.16 - Personnel Training. None of the generators inspected had a personnel training plan. The generators failed to have the documents and records required by 265.16(d). The only record maintained was a log sheet showing the training an individual received. An adequate number of personnel were not trained at all generating sites. The generators need back-up personnel to manage the hazardous waste when the primary individual is on leave. TMO, who signs the manifest as the generator for safety Kleen Services, had no training plan and had an individual sign the manifest who had no hazardous waste training.

NREAD Response: Partially Concur. Proper wording would have been that "generators inspected had inadequate training plans." Comments on need of back-up personnel are very accurate. Inadequacy of HW training is addressed in proposed revision of reference (a) con-



tained in enclosure (1). TMO is establishing internal controls to ensure that only properly trained personnel are authorized to sign HW manifests.

8. EPA Comments: Regarding Subparts C and D in 40 CFR Part 265 the following discrepancies were noted:

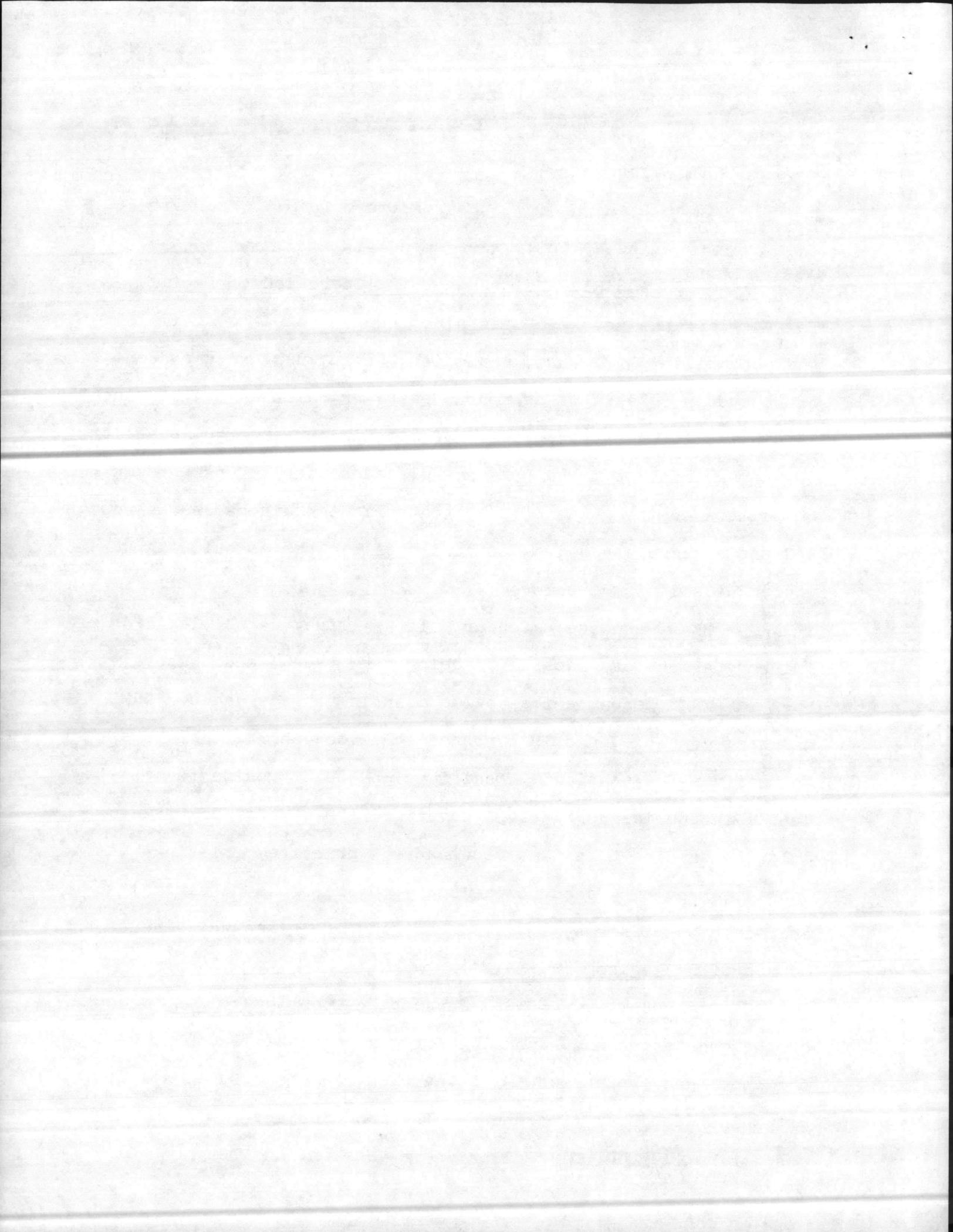
40 CFR 265.31 - Maintenance and Operation of Facility

The facility has not been maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. The USMC has placed batteries upside down on pallets on the ground. These batteries contain hazardous waste and the residue could leak out and possible has at building 909 where the soil is discolored.

NREAD Response: Concur. If we infact agree with EPA interpretations of electrolyte being a HW (see 5 and 6 above), then turning the batteries upside down is not advisable. DRMO has been contacted and is expected to advise shortly relative to modifying regulations. Modification would provide for placing drained batteries upright and covering with a sheet of plywood prior to banding to pallet vice current practice of laying them on side or turning them upside down. Costs would be minimal and would be offset by improved handling of characteristics of this method of packaging.

9. EPA Comments: 40 CFR 265 Subpart D - Contingency Plan. None of the generators had a contingency plan and this includes TMO. The contingency plan must meet the requirements of this section.

NREAD Response: Nonconcur. The lead inspector was shown copy of BO 11090.3, Oil Pollution Prevention and Abatement Oil



and Other Hazardous Substances Spill Contingency Plan. It is NREAD's opinion that during the subject inspection, facility personnel displayed working knowledge of their responsibility to report spills immediately. In NREAD's opinion the actual discrepancy is the lack of a site specific contingency plan to guide steps to be taken by facility personnel until Fire Department arrived on the scene. Also, site specific responsibilities for spill prevention are inadequate. From a management point of view, the ENSAFE Study and the proposed revision of reference (a) contained in enclosure (1) addressed this issued adequately. Enclosure (1) requires a written SOP at each generation/storage site and by strengthening training requirements. Additionally, enclosure (1) requires Commanding Officers to place emphasis on internal controls required to implement the revised Order when published.

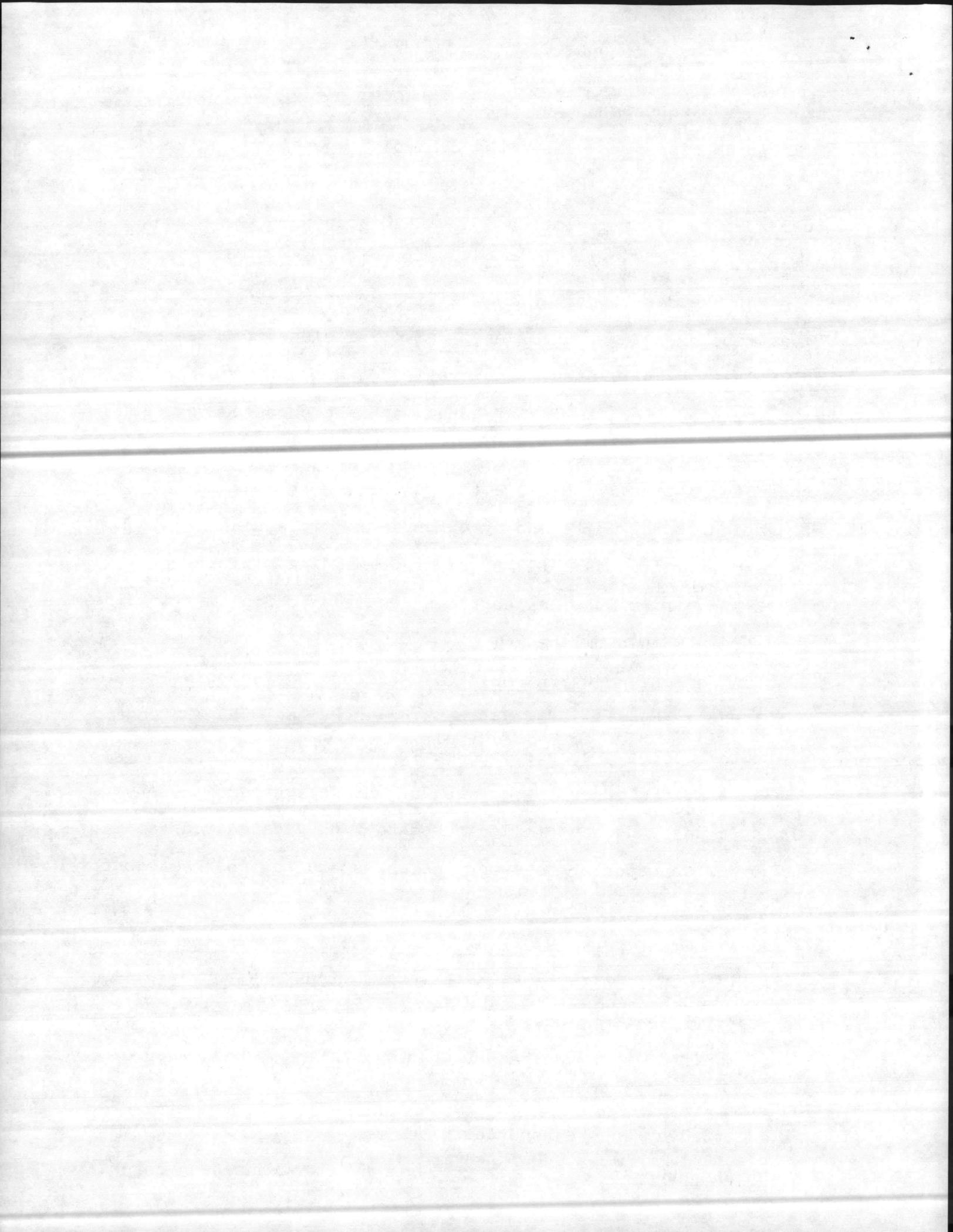
10. EPA Comment: 40 CFR 262.42(a) - Exception Reporting

On all manifests (six) for Safety Kleen Services, the USMC has failed to receive a copy of the manifest with the written signature of the owner or operator of the designated facility within 35 days and have failed to contact the designated facility and/or the transporter to determine the status of the hazardous waste.

EPA Comment: 40 CFR 262.42(b) - Exception Reporting

The facility has failed to submit an Exception Report for all the Safety Kleen Services where the USMC has not received a copy of the manifest with the hadnwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the transporter.

NREAD Response: Concur. Corrective action has been taken.



TMO representative has obtained the above manifests which were apparently mailed to wrong local address. NREAD and TMO are cooperating to develop internal controls to ensure timely exception reporting. It is extremely important that Base Contracting ensure all service contracts require contractor to have each manifest/shipment approved or signed by TMO at the time HW leaves the installation. The Safety Kleen Services concept is placing significant burden on TMO. Proposed revision of reference (a) transfers responsibility for providing Base Hazardous Material Disposal Coordinator from TMO to NREAD. This will allow TMO to concentrate on HW transportation. However, this does increase NREAD workload and must be addressed.

11. The following specifically addresses operation of the base long term HW storage facility and associated DRMO functions:

a. EPA Comments: Permit Condition - Inspection Log

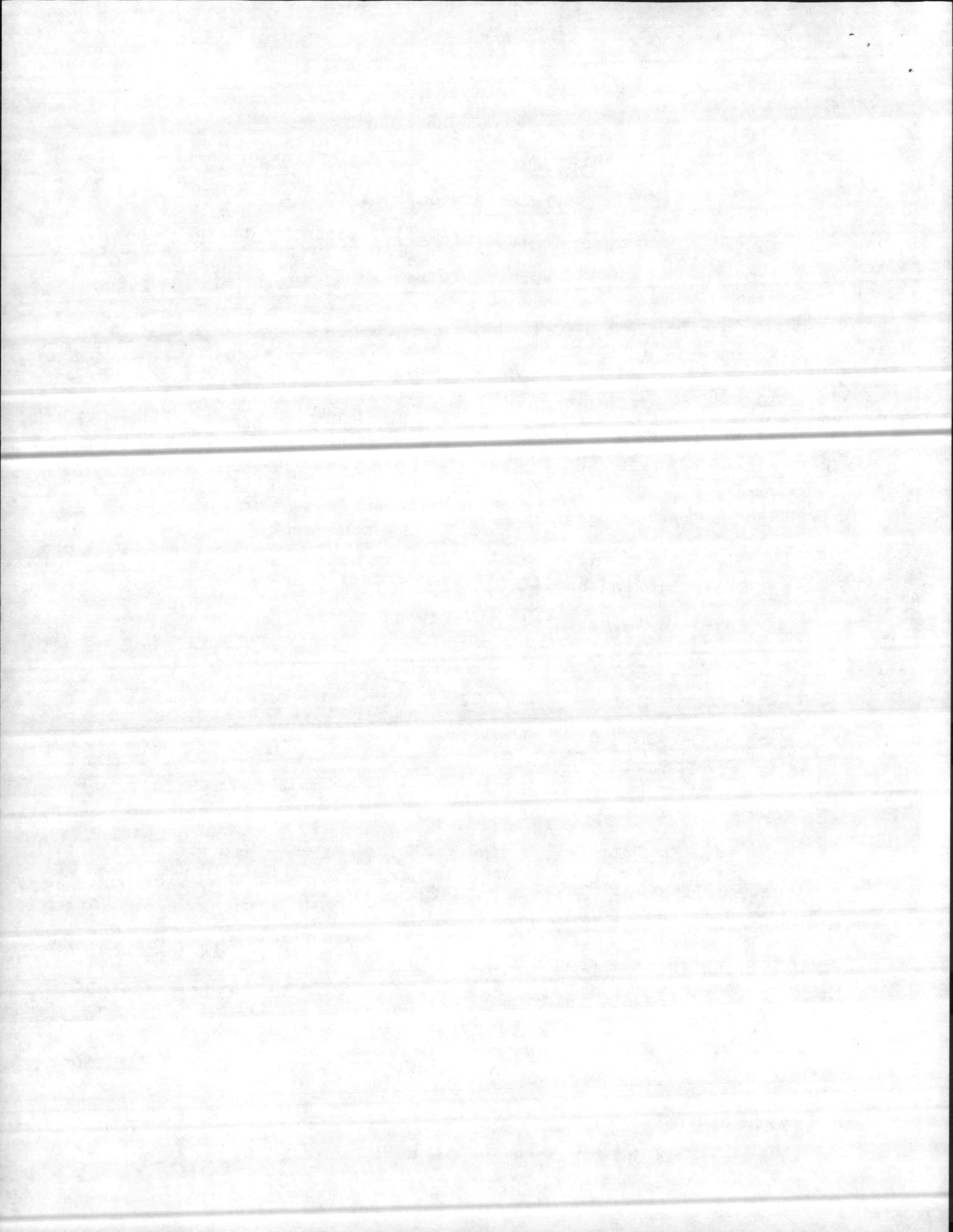
The USMC has changed the inspection log to a better form than what was in the permit. This form should be changed in the permit.

NREAD Response: Concur. Should be done in conjunction with d below.

b. EPA Comments: 40 CFR 264.16 - Personnel Training

The facility has failed to revise the personnel training plan to show all individuals involved in hazardous waste. Several individuals have been added and received training in hazardous waste, but the training plan fails to recognize these positions.

NREA Response: Concur. DRMO needs to involve more of their people in HW management to increase flexibility in dealing with absences of key personnel (i.e., Mr. Eggers) and to ensure that HW minimization goals and objectives are promoted.



c. EPA Comment: Permit Condition - Container Storage

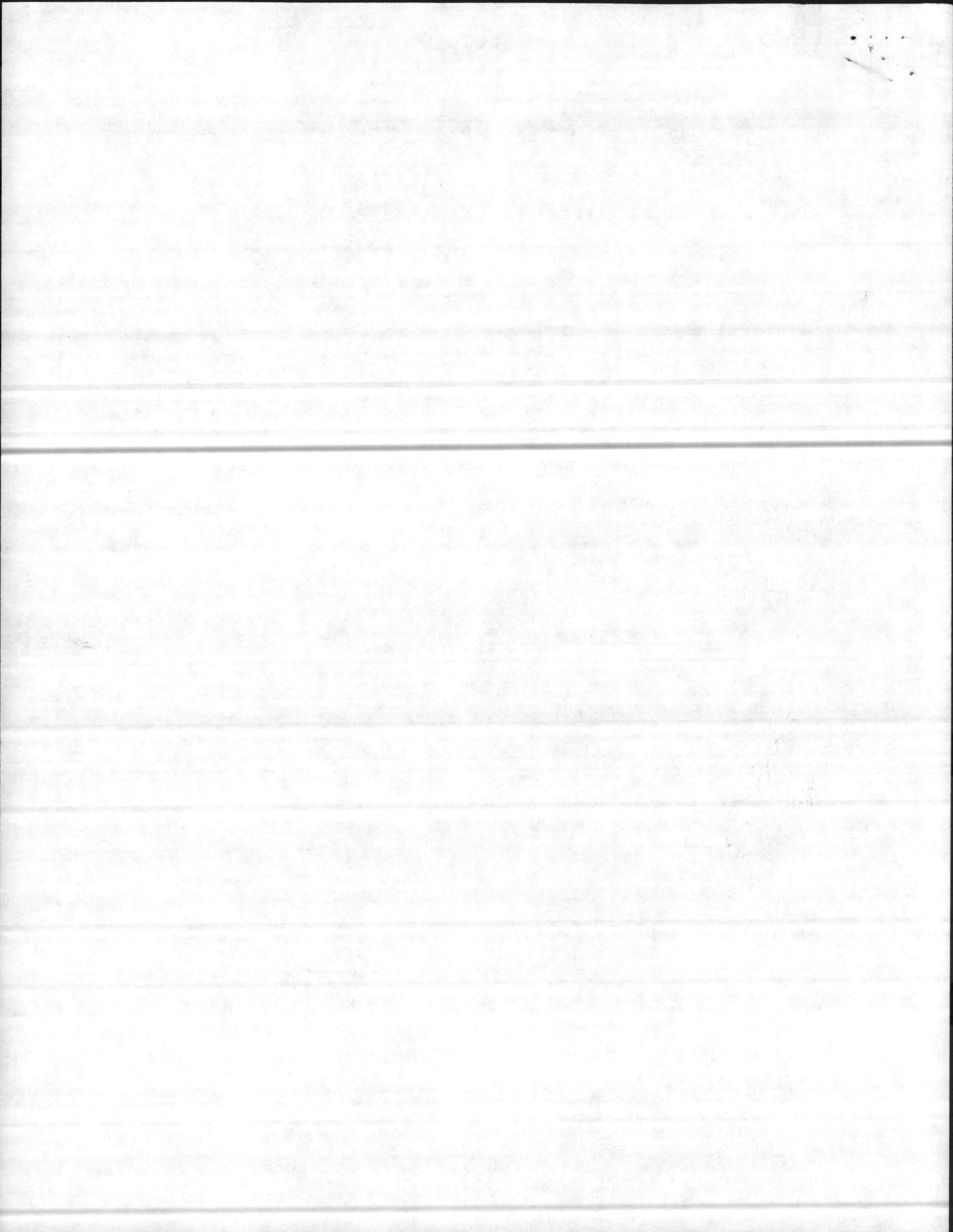
The permit requires drums be stacked no higher than two high. At the permitted storage buildings, boxes (crates) the same size as drums were stacked higher than two drums.

NREAD Response: Concur. Not sure that the above actually violates intent of permit. However, until such time as storage capability in facility becomes a problem, there is no reason to make an issue of this. No trends in volumes have been observed which would indicate a problem in this area.

d. EPA Comment: Permit Condition - Modification

The USMC has failed to notify the State that the operator of the facility has changed names from DPDO (Defense Property Disposal Officer) to DRMO.

NREAD Response. Concur. Should be done in cooperation with a(1) above.



UNITED STATES MARINE CORPS
Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

BO 6240.5A
NREAD/st

BASE ORDER 6240.5A

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Distribution List

Subj: Hazardous Material Disposal Program

Ref: (a) Resource Conservation and Recovery Act (Pub No. 94-580) (42 USC 6901-6987) (NOTAL)
(b) EPA Regulations contained in Code of Federal Regulations, Title: 40 Parts 260-265 (NOTAL)
(c) DOT Regulations contained in Code of Federal Regulations, Title: 49 Parts 100-179 (NOTAL)
(d) BO 11090.1B
(e) BO 11320.1G

Encl: (1) Procedures for collection, storage and turn in of Hazardous Material (HM) and Hazardous Waste (HW) for disposal
(2) Responsibilities for Hazardous Material (HM)/Hazardous Waste Disposal
(3) Hazardous Waste Training Requirements and Guidelines

1. Purpose. To revise responsibilities, procedures and guidance for hazardous material (HM) and hazardous waste (HW) disposal and related environmental protection for the Camp Lejeune and Marine Corps Air Station, New River complex.

2. Cancellation. B) 6240.5

3. Background

A. Congress and the state legislatures have responded to the threats to human life and the environment caused by mismanagement and illegal spilling and dumping of toxic substances by enacting laws which not only attempt to avert future threats but which impose civil and criminal penalties. In enacting many of these environmental laws, Congress waived federal supremacy, requiring federal agencies including the Marine Corps, to comply with federal, state and local environmental laws. The same Congressional action also stripped federal officers and employees of their official immunity for violation of federal, state and local pollution control and environmental laws. Federal officers and employees now face the possibility that they may be personally liable for civil and criminal penalties and fines as well as imprisonment.

B. The Environmental Protection Agency (EPA) has authorized the State of North Carolina to enforce the requirements of references (a) and (b) through a state HW regulatory program. The Solid and Hazardous Waste Management Branch, Division of Health Services (DHS), is the primary enforcing agency within North Carolina. DHS enforcement personnel have authority to investigate HW spills and perform routine inspections of work sites where HW are handled and stored. These investigations and inspections can result in citations being issued to supervisors and/or personnel at the work site for civil and/or criminal violations of HW regulations.

C. Organizational commanders subject to this Order should be aware that four basic management issues must be addressed if HW are to be safely and efficiently handled and legal requirements satisfied. These are: ~~use of proper type containers~~ *see note 1 below* in good condition; clear, accurate marking and labeling of containers; availability of adequate supplies, equipment and storage facilities; and most important, proper HW training for all personnel routinely involved in HW management. Enclosures (1), (2) and (3) provide revised responsibilities, guidelines and procedures for HW management and related personnel training. HW training for military personnel is a major ongoing problem due to personnel turn over rates.

D. Major commands have established two collateral duty positions to coordinate and to assist with the implementation of the subject program. These are titled Hazardous Material Disposal Coordinator (HMDC) and Hazardous Material Disposal Officer (HMDO).

Note 1 delete shaded area and insert: Use of containers which both meet requirements of reference (c) and are in good condition.

HMDC AND HMDO responsibilities are outlined in enclosure (2) The appointment and training of qualified primary and alternate HMDCs and HMDOs essential to implementation of the complex requirements of the subject program. Arc

4. Action.

A. Organizational commanders shall on a continuing basis take action required to implement the following HW management goals and objectives:

(1) HW operations will be supervised by properly trained personnel who have access to equipment and supplies required for handling HW safely and dealing with potential emergencies.

(2) HW training plans will be developed and implemented for all HW managers and handlers, and appropriate records maintained to document that proper training is being provided to personnel.

(3) OIC/NCOIC's will ensure that HW facilities are inspected weekly and timely corrective action is taken and properly documented per this Order and related instructions of HMDO/HMDC.

(4) OIC/NCOIC's will prepare a written HW management SOP in cooperation with HMDO for each facility where HW are routinely handled and stored. SOP will be readily available at facility.

(5) A system of internal controls will be implemented continuously in a manner which ensures that violations of this Order are identified and proper level of disciplinary action is taken to discourage recurring violations.

B. Major commands will take action required to limit HW generation to the fewest locations practical, to identify HW handling and storage equipment and facilities requirements and to develop and implement a system of internal controls which provides satisfactory compliance with the requirements of this Order and related regulatory requirements. As a minimum the following action will be taken:

(1) Appoint a primary and alternate HMDC with authority and resources to implement duties outlined in enclosure (2).

(2) Maintain at all times a listing/directory of facilities where HW are handled and stored *And ensure timely submission of waste identification documents per enclosure (1).*

(3) Require OIC/NCOIC's ~~in charge~~ of HW handling and storage facilities to develop and implement a written HW SOP for each facility. The SOP will be readily available to personnel routinely handling HW or dealing with HW and related emergency response. *Per enclosures (1) and (3)*

(4) Require Commanding Officers of each Marine Air Group, Regiment, Battalion and separate Company (or equivalent) to appoint a HMDO with the authority and resources to carry out the duties outlined in enclosure (2).

(5) Establish and promote HW management goals and objectives for supply and maintenance functions which promote the minimization of the volume and toxicity of HW generation.

5. Concurrence. This Order has been coordinated and concurred in by the Commanding Generals, II Marine Amphibious Force, 2d Marine Division, FMF, 2d Force Service Support Group (Rein), FMF, 6th Marine Amphibious Brigade, FMF, and the Commanding Officers, Marine Corps Air Station, New River, Naval Hospital and the Naval Dental Clinic.

M. C. HARRINGTON
Chief of Staff

DISTRIBUTION: A

... of the ...

PROCEDURES FOR COLLECTION, STORAGE AND TURN-IN OF HAZARDOUS
WASTE (HW) AND HAZARDOUS MATERIAL (HM) FOR RECYCLING OR DISPOSAL

1. Hazardous Waste Management Standard Operating Procedures (HWMSOP). Each organization routinely generating or handling HW or disposing of HM will develop desk top procedures to be followed. As a minimum, the HWMSOP will prove the following:

- a. Name and telephone number of cognizant Hazardous Material Disposal Officer (HMDO) and Hazardous Material Disposal Coordinator (HMDC).
- b. Copy of BO 6240.5_ and 11090.1_.
- c. Name, title, duties and HW training records for each employee per enclosure (3).
- d. Waste Identification Document (WID) for each HW generated or handled completed per attachment (A) of this enclosure.
- e. Procedures and responsibilities for dealing with HW/HM spills and related emergencies.
- f. Copies of weekly inspections of HW storage areas/containers.
- g. Guidance provided by HMDO/HMDC's to implement HW/HM disposal program.
- h. Location sketch for each HW storage area.

2. HM/HW Collection and Storage Procedures/Requirements.

a. Possession of a properly completed and signed WID constitutes authorization to generate, handle or store a HW. Failure to submit a WID to HMDC within 30 days of date HW first generated or handled or 60 days of the date of this Order (whichever is later) will be considered a violation of this Order. HMDC's are responsible for monitoring and enforcement of this requirement.

b. Only Department of Transportation (DOT) approved containers labeled per attachment (B) will be used for storage of HW awaiting disposal. HMDO's are responsible for enforcing this standard.

c. All personnel routinely handling or responsible for HW management must be properly trained per this Order and references (a) and (b). OIC's are responsible for maintaining training records for personnel within their cognizance. HMDC's are responsible for enforcement of this requirement.

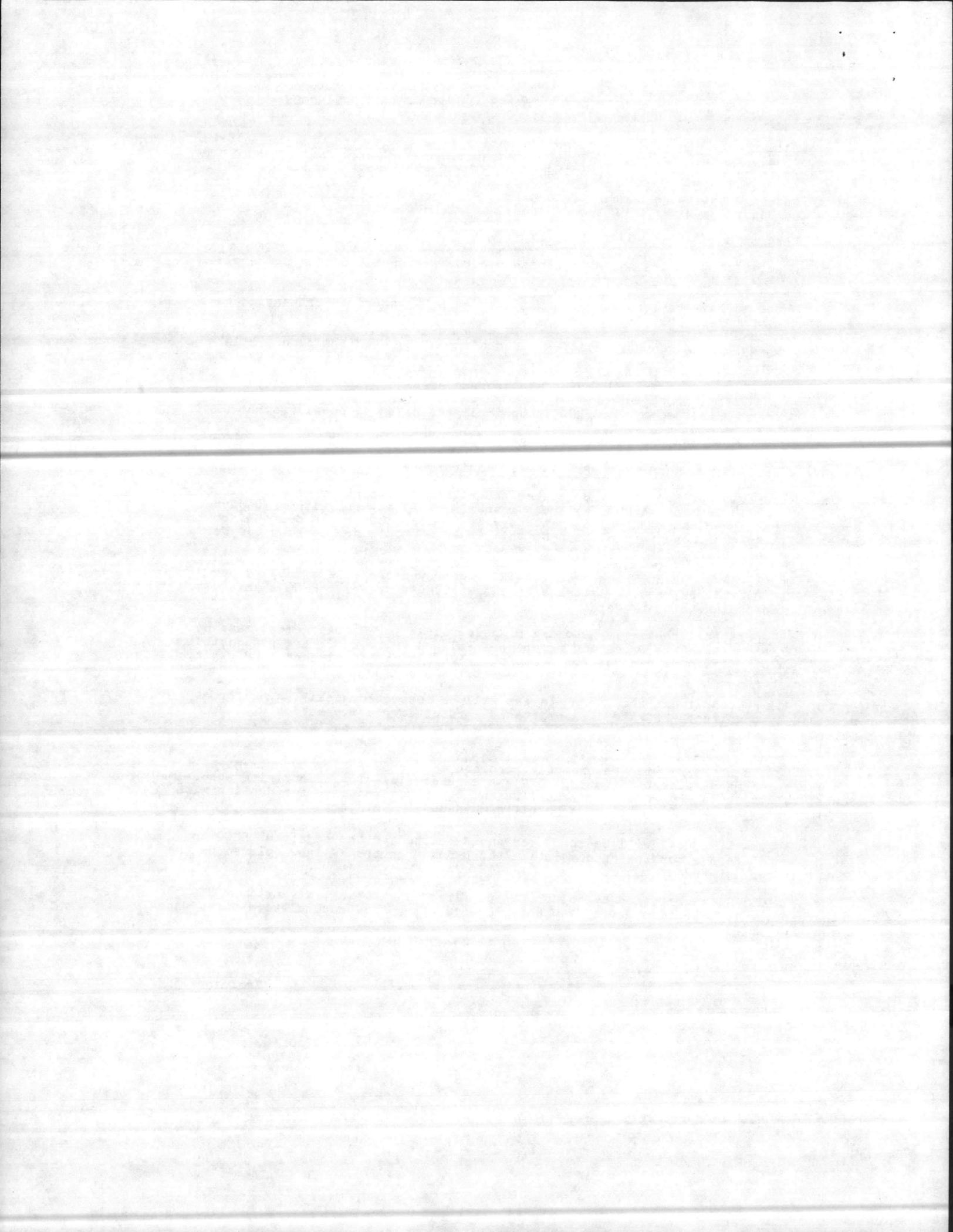
d. All HW containers and storage areas will be inspected weekly using format provided by cognizant HMDC/HMDO. A written record of corrective action will be maintained per HMDO/HMDC guidance. Director, NREAD, MCB will assist HMDC/HMDO develop guidelines.

e. Spills of HW/HM will be promptly reported to the Base Fire Department at the Emergency Telephone Number 451-3333. OIC's are responsible for maintaining absorbents, safety equipment, and other supplies and equipment required for dealing with spills; HWMSOP will give specific guidance in this area.

f. A Form DD 1348-1 will be completed and submitted to the cognizant HMDO not later than 45 days after the "accumulation start date" on the HW label placed on the container per attachment (B).

g. HMDC will be notified by telephone, confirmed in writing, of anytime DRMO has not accepted accountability of a HW within 75 days after the "accumulation start date" on any HW container.

Enclosure (1)



3. Hazardous Material (HM) and Hazardous Waste (HW) Turn-in Procedures. The following steps will be taken to initiate final disposal of HM/HW. At any time that a major problem or controversy arises, the organization attempting to turn-in the item will immediately notify the responsible Hazardous Material Disposal Coordinator (HMDC). The HMDC will be responsible for coordinating efforts to resolve the problem/controversy and will utilize the assistance of the Director, Natural Resources and Environmental Affairs Division (NREAD), Facilities Department, Marine Corps Base, telephone extension 2083, 2195. Unresolved problems/controversies will be referred to the Assistant Chief of Staff, Facilities, Marine Corps Base.

STEP 1. The Officer in Charge (OIC) of the organization having physical custody of HM/HW is responsible for turn-in of HM/HW unless otherwise specified by HMDC. OIC will properly containerize the HM/HW and submit a Form DD 1348-1 to the cognizant Hazardous Material Disposal Officer (HMDO) per instructions in organization's HWSOP. Questions not addressed by HWSOP will be directed to HMDO.

STEP 2. The HMDO will physically inspect the HM/HW and determine if the Form DD 1348-1 is properly completed and the HM/HW is properly packaged. The HMDO will coordinate correction of any problems. Unresolved problems will be referred to cognizant HMDC for resolution. Once problem's resolved, HMDO will forward (preferably hand deliver) the Form DD 1348-1 to the Defense Reutilization and Marketing Office (DRMO) Headquarters, Bldg 906.

STEP 3. The DRMO will inspect the HM/HW if necessary, and will determine if DRMO is accountable (i.e., responsible) for disposal of the HM/HW. If DRMO determines that the local activity, not DRMO, has responsibility for disposal of the HM/HW, the DRMO will so notify the cognizant HMDC in writing with a copy to the NREAD. The HMDC and NREAD will cooperate in developing case specific procedures for disposal of the item. AC/S Logistics, MCB, will provide contracting support.

STEP 4. If DRMO determines that DRMO is accountable for HM/HW, DRMO will determine where the HM/HW will be stored awaiting disposal. HW must be stored at the DRMO facility at TP-451 complex, unless otherwise approved by the AC/S, Facilities, MCB. DRMO will submit a request to the Traffic Management Office (TMO), MCB, to arrange transportation of the HM/HW to DRMO designated facility.

STEP 5. TMO in cooperation with HMDO will determine if generating organization can safely, legally transport the item to DRMO designated facility. TMO must directly supervise transportation of HW. Whenever practical, Command turning in a HM will provide transportation. TMO and HMDO will cooperate in promoting efficient, safe transportation. Spills or other emergencies will be promptly reported to the Base Fire Department at 451-3333. *Drivers will be provided written spill prevention and response guidance.*

STEP 6. When the HM/HW arrives at storage facility, DRMO will inspect prior to unloading. DRMO is authorized to refuse the HM/HW if any significant discrepancies exist. DRMO will immediately notify cognizant HMDC and NREAD of DRMO's refusal to accept the HM/HW. The transporting vehicle will be secured and will not be moved outside the immediate vicinity of DRMO facility except for emergency situations involving risk to public safety or to property. DRMO, HMDC and NREAD will cooperate in making an immediate decision on corrective action. If problems cannot be promptly resolved the HM/HW will be returned to the generating organizations facilities.

STEP 7. When DRMO accepts physical custody of the HM/HW, turn-in is complete.

ENCLOSURE (1)

4. Standards for Hazardous Waste Satellite Accumulation Areas

a. General. Satellite accumulation area (SAA) is a term developed by the Environmental Protection Agency (EPA) to designate a work site which may generate and accumulate hazardous waste (HW) without regard to the 90 day storage limit normally applicable to non-permitted HW storage facilities. The purpose of setting up this special category of HW storage is to assist those generators who generate HW at a very slow rate, example, one container per every 6 months. Previously, these generators were required to dispose of partially filled containers, a very inefficient and often expensive practice. Any work site routinely generating a HW at a rate of less than one full container per 45 day interval may benefit from being designated as a SAA. The decision to designate a work site as a SAA will be made by the cognizant Hazardous Material Disposal Coordinator (HMDC). The HMDC will develop the proposal and submit to the Director, Natural Resources and Environmental Affairs Division (NREAD), MCB, for concurrence and technical review. The HMDC will ensure that SAA requirements are incorporated into the HW SOP for the generating site.

b. SAA Requirements.

(1) SAA must meet applicable fire prevention regulations enforced by the Base Fire Protection Division.

(2) All containers must meet Department of Transportation (DOT) regulations for the specific type of materials stored in them.

(3) All containers will have a hazardous waste label attached per BO 6240.5. The "accumulation start date" will be left blank until the date container is full, at which time the current date will be entered. The container must be physically moved to the designated storage area shown in the HW SOP.

(4) A sign shall be installed at the SAA which provides the following or equivalent:

(a) IN CASE OF EMERGENCY NOTIFY BASE FIRE DISPATCHER AT 451-3333 and HAZARDOUS MATERIAL DISPOSAL OFFICER AT _____.

(b) UNAUTHORIZED PERSONNEL KEEP OUT

(c) NO SMOKING

(d) SPILL CONTINGENCY PLAN IS ATTACHED BELOW:

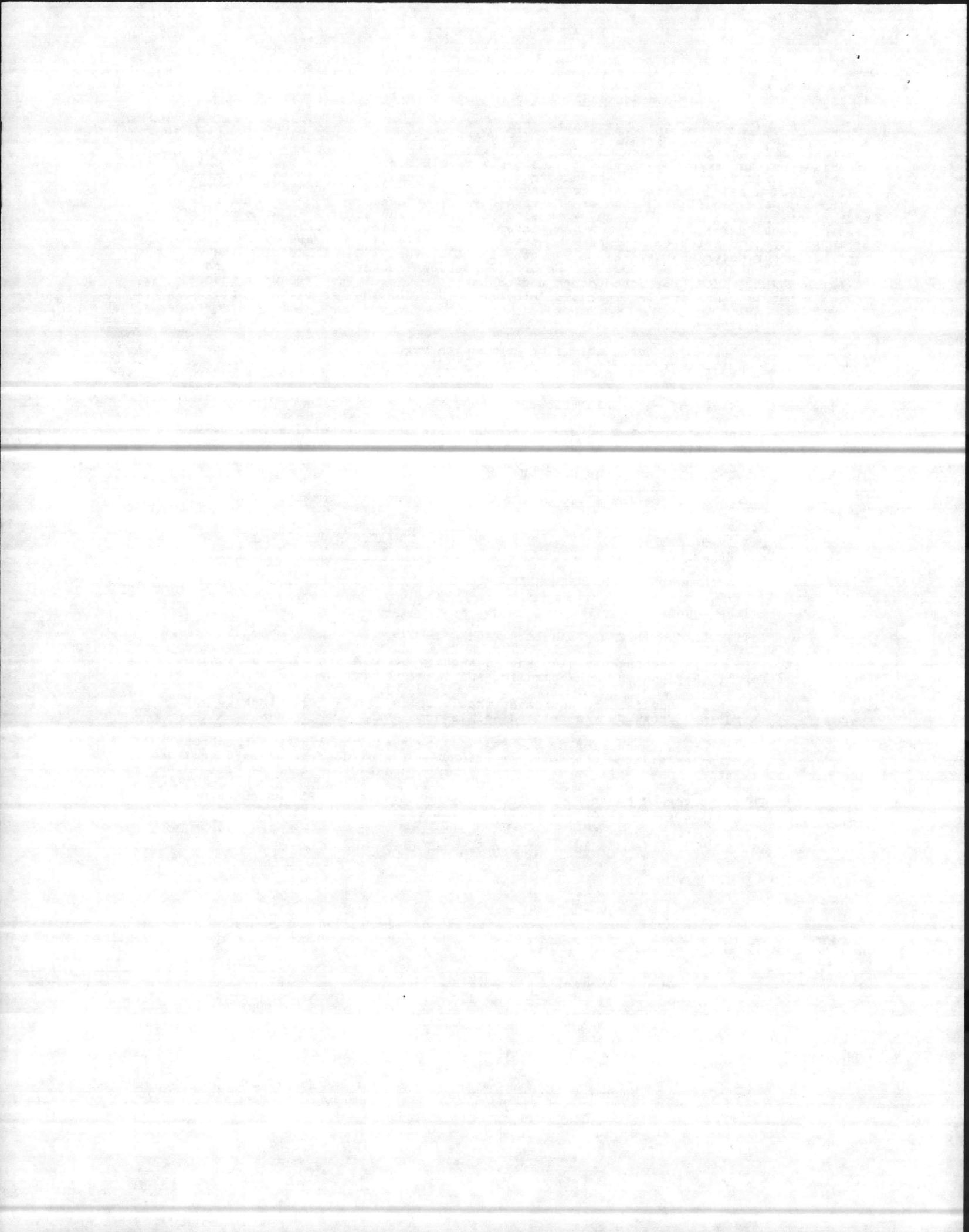
(5) The spill contingency plan should specify by name and title persons responsible for all key phases of HW handling and emergency response.

(6) Adequate supplies and equipment should be on hand at all times to ensure safe, timely handling of the HW and related spills and leaks.

(7) An informal inspection of the SAA will be conducted during each normal work day. Deficiencies will be promptly corrected. A log of discrepancies discovered and corrective action taken will be maintained in any format designated by OIC.

(8) Total volume of HW at SAA may not exceed 55 gallons. Filled containers must, by EPA regulations, be removed from SAA within 3 days of the date filled.

ENCLOSURE (1)



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: _____

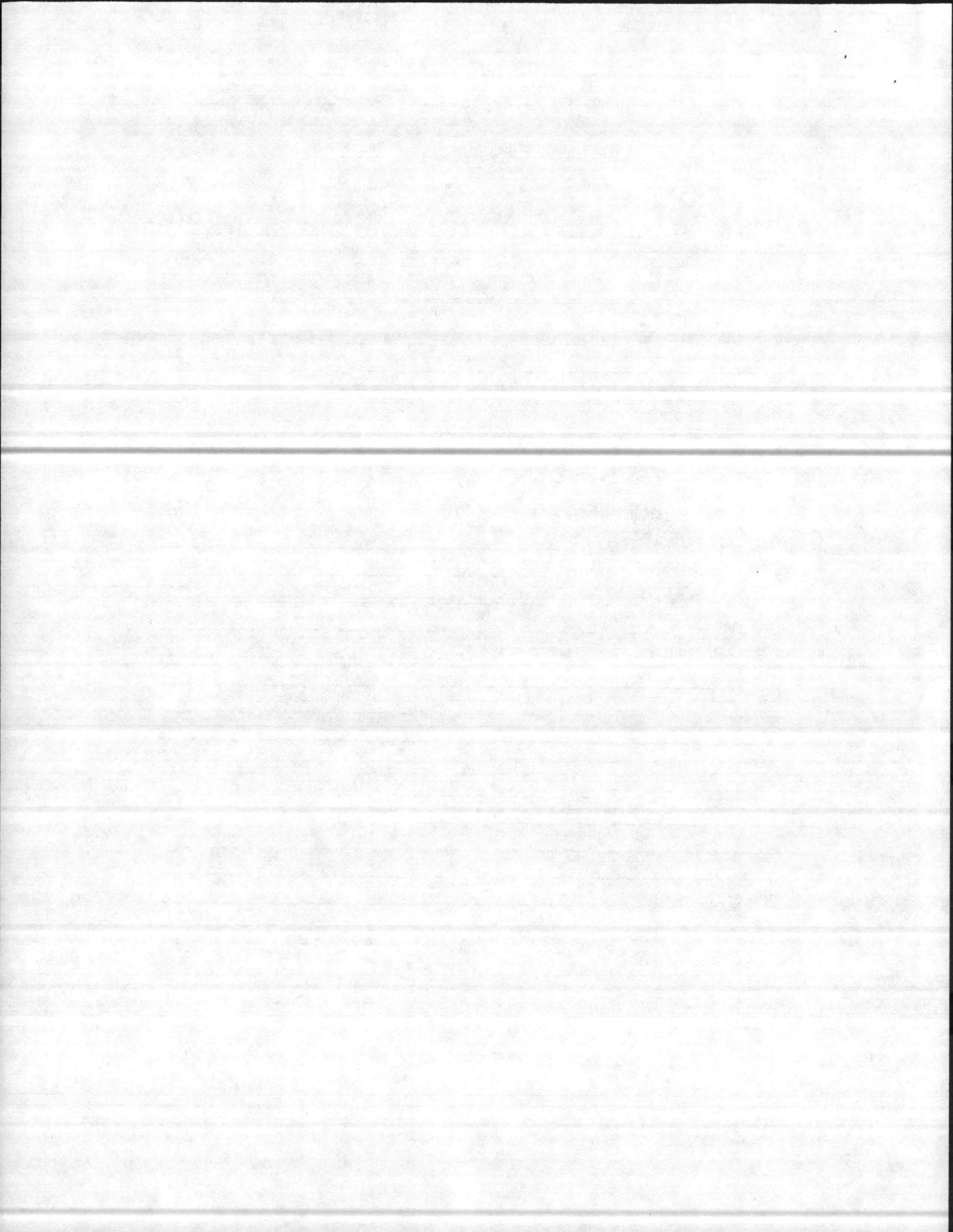
14.

HMDC
Signature

Code

Date

Appendix A to
ENCLOSURE (1)



DATE _____

WID # _____

1. GENERATING WORK CENTER INFORMATION

Shop _____ Contact _____ Command _____ Building _____ Phone Ext. _____

2. WASTE IDENTIFICATION

A. WASTE NAME: Common _____ Chemical(s) _____

B. PHYSICAL FORM: (CHECK) ___ Liquid ___ Solid ___ Sludge ___ Other (Specify) _____

C. MANUFACTURER: _____ D. NATIONAL STOCK NUMBER: _____

E. CONTAINER: (TYPE AND SIZE) _____

F. GENERATION RATE: (e.g., gal/day, lbs/day) _____

G. FREQUENCY OF GENERATION _____

H. EXPECTED ANNUAL GENERATION: (GALS, LBS) _____

I. DESCRIBE WASTE GENERATION PROCESS: _____

J. HAS WASTE BEEN MIXED WITH ANY OTHER MATERIAL? ___ Yes ___ No If yes, specify _____

3. REASON FOR DISPOSAL: (CHECK)

___ Exceeded shelf life ___ Served intended purpose ___ Unused ___ Other
(specify) _____

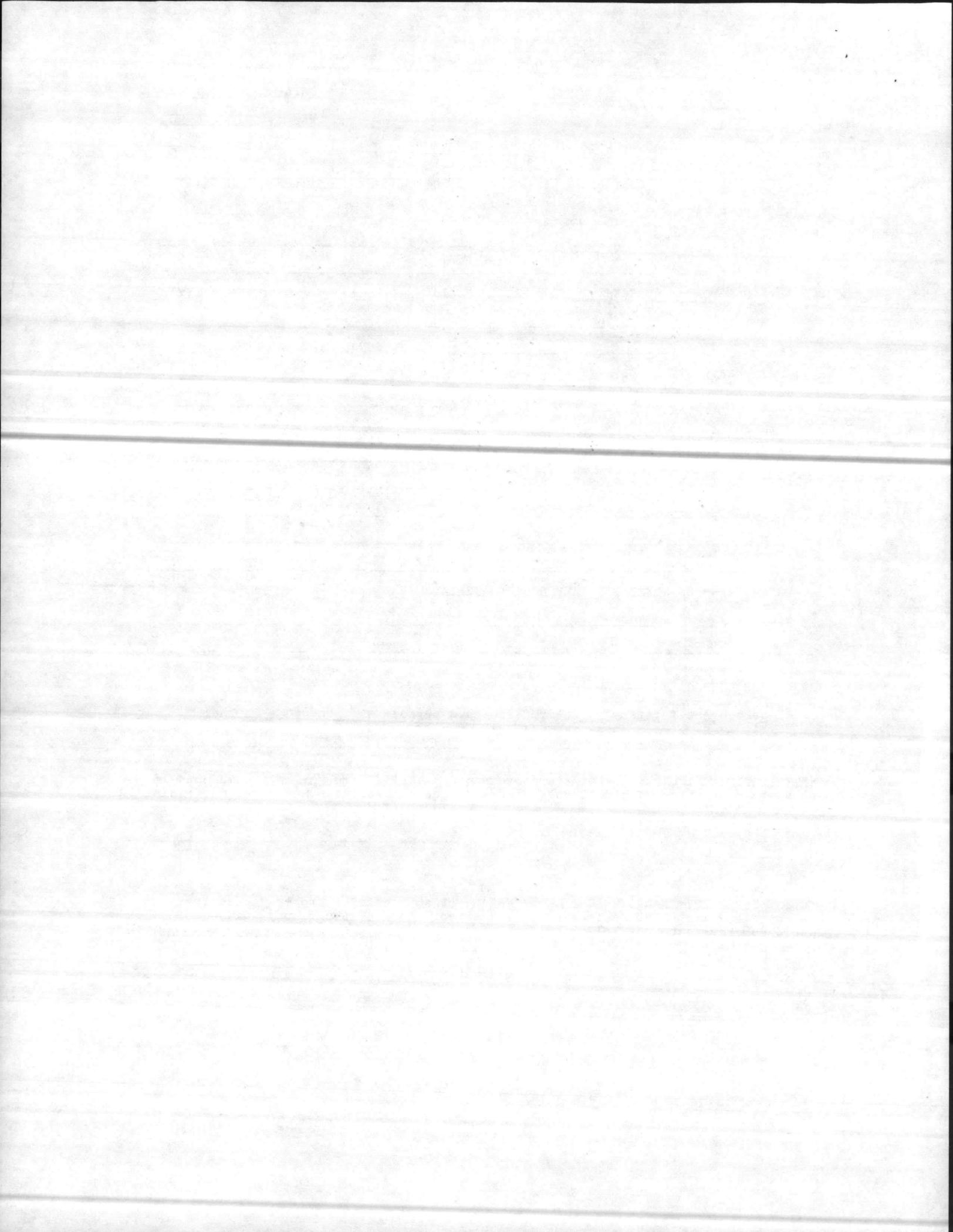
4. CERTIFICATION: I certify that the above named materials are the only compounds in the waste containers listed above and have not been mixed with any other materials

HMDO _____ DATE _____
Signature

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 _____ DATE _____
Signature

Appendix A to
ENCLOSURE (1)



See Note 1

HAZARDOUS WASTE	
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL	
IF FOUND, CONTACT THE NEAREST OFFICE OF PUBLIC SAFETY OR AUTHORITIES FOR THE ENVIRONMENTAL PROTECTION AGENCY	
Shipping Name: _____	
Generation Information: _____	
Date: _____	
Location: _____	
Accumulation Area: _____	
HANDLE WITH CARE!	
CONTAINS HAZARDOUS TOXIC WASTES	

- Note 1: The above label or equivalent will be placed on all hazardous waste (HW) containers prior to use for storage of HW. Damaged labels will be immediately replaced, using same information as on original label. If original label illegible, contact your Hazardous Material Disposal Officer for guidance.
- Note 2: Obtain this information from your HW Standard Operating Procedure. If not available, contact your Hazardous Material Disposal Officer.
- Note 3: Enter the name of the organization having physical custody of the HW at time label placed on the container, unless replacing a damaged label. See Note 1 above.
- Note 4: Enter either "MCAS, New River, Jacksonville" for HW generated aboard or by organizations stationed aboard the Marine Corps Air Station, New River. Enter "Marine Corps Base, Camp Lejeune" for all other HW generated locally.
- Note 5: Enter NC 8170022570 for all waste generated aboard or by organizations stationed aboard MCAS, New River. Enter NC 6170022580 for all other HW generated within the Camp Lejeune complex.
- Note 6: Enter the date that HW first placed in the container unless the facility has written authorization from CG, MCB, Camp Lejeune to operate as a HW satellite accumulation area. In which case, follow instructions provided within the written authorization.
- Note 7: Leave blank, will be completed by the Traffic Management Officer, Camp Lejeune.

Appendix B to
ENCLOSURE (1)

RESPONSIBILITIES FOR HAZARDOUS MATERIAL (HM)/HAZARDOUS WASTE (HW) DISPOSAL

1. Compliance with hazardous waste management and disposal regulations requires the cooperative effort of many functions within the Camp Lejeune complex. The following outlines the responsibilities of various officers and managers relative to hazardous waste management:

a. Hazardous Material Disposal Officer (HMDO) will:

(1) Provide assistance to HW generators and handlers in the preparation and timely submittal of HW turn-in documents per BO 6240.5.

(2) Perform quarterly inspections of HW generation and storage sites and notify OIC's of corrective action required to provide compliance with BO 6240.5.

(3) Keep OIC's and key personnel informed of any changes in regulations affecting HW activities within the HMDO's cognizance and ensure that HW standard operating procedures (SOP) are up to date and readily available for review by personnel involved in HW management.

(4) Develop a roster of personnel involved in HW management at each work site within the HMDO's cognizance.

(5) Develop and provide HW Training requirements to HMDC for personnel within the HMDO's cognizance.

(6) Actively promote the reduction of volume and toxicity of HW produced by organizations within the HMDO's cognizance.

(7) Conduct surveys required to identify HW generation and storage sites within the HMDO's cognizance and provide periodic updates as questioned to the HMDC.

b. Hazardous Material Disposal Coordinator (HMDC) will:

(1) Provide assistance to HMDO's in handling HW management problems. Serve as HMDO for organizations not having sufficient HW activity to justify appointment of a HMDO.

(2) Perform annual inspections of HW generation and storage sites and notify HMDO's of corrective action required to provide compliance with BO 6240.5.

(3) Inform HMDO's of any changes in regulations affecting HW activities under the HMDO's cognizance.

(4) Serve as command point of contact with Marine Corps Base Environmental personnel on matters dealing with worksite HW inspections by State and Federal agencies and implementation of this Order.

(5) Develop listings of HW generation and storage facilities.

(6) Develop and provide to the Base Civilian Personnel Division (CPD) the HW training requirements of the HMDC's command.

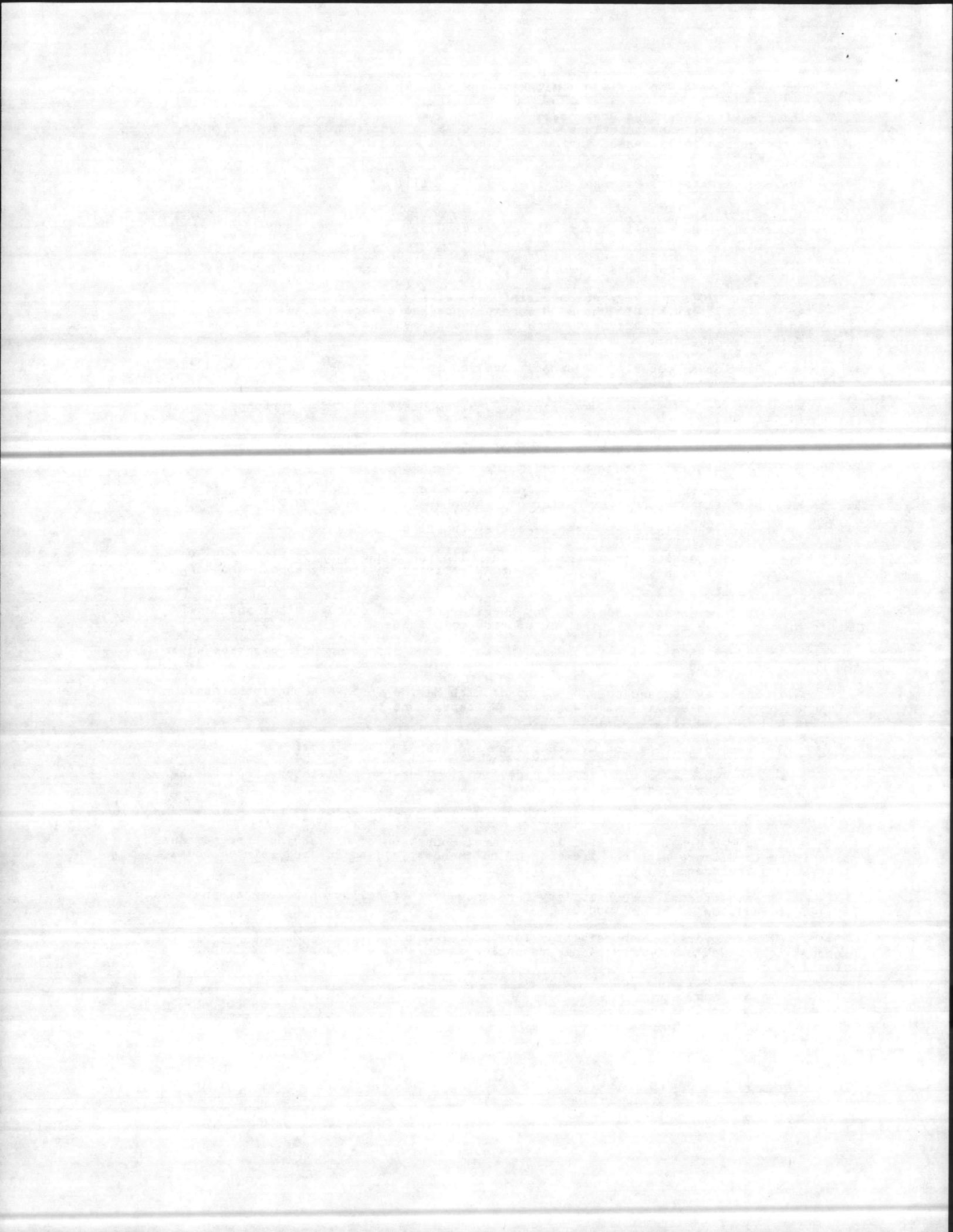
c. Assistant Chief of Staff, Facilities, Marine Corps Base will:

(1) Have overall responsibility for implementation of the subject program and maintaining compliance with requirements of references (a) and (b) and related local, state and federal regulations.

(2) Have overall responsibility for management of pollution abatement projects per latest revision of MCO P11000.8.

(3) Have overall responsibility for local implementation of Marine Corps programs to correct environmental discrepancies associated with past HM/HW disposal sites.

ENCLOSURE (2)



(4) Ensure that plans and specifications for new facilities provide adequate facilities and collateral equipment for the handling and storage of HM/HW.

d. Director, Natural Resources and Environmental Affairs Division will:

(1) Provide a staff specialist to serve as HMDC for Marine Corps Base.

(2) Provide a command point of contact with state and federal agencies on matters pertaining to the subject program.

(3) Monitor ongoing activities as required to identify, evaluate and provide up-channel reporting of environmental deficiencies related to the subject program.

(4) Coordinate day-to-day implementation of this Order and provide the following types of technical assistance:

(a) Laboratory support, if required, for HW identification.

(b) Training to HMDC's and HMDO's on state and federal environmental laws, regulations and procedures.

(c) Guidance on HM/HW SOP preparation.

(d) Guidance on HM/HW spill prevention, control, cleanup and related HW disposal.

(e) Coordination of HM/HW recycling/minimization program.

(f) Preparation and submission of reports to regulatory agencies required by references (a) and (b).

e. Base Maintenance Officer will:

(1) Collect and dispose of used POL's and oily wastes from collection tanks and other oil pollution abatement facilities in a manner consistent with this Order and references (a) and (b).

(2) Unless otherwise provided, operate and maintain industrial waste collection and pretreatment facilities associated with base sewage collection and treatment systems.

(3) Provide HM/HW spill response services in accordance with reference (d).

f. Base Fire Chief will:

(1) Provide HM/HW spill and related emergency services per references (d) and (e).

(2) Provide routine inspections of facilities where HM/HW are stored and handled, and report all discrepancies to cognizant HMDC. Elimination of the following hazards will be stressed:

(a) HM/HW stored in defective containers or containers which are not properly marked with the chemical name, NSN (if appropriate) and hazard label of the contents.

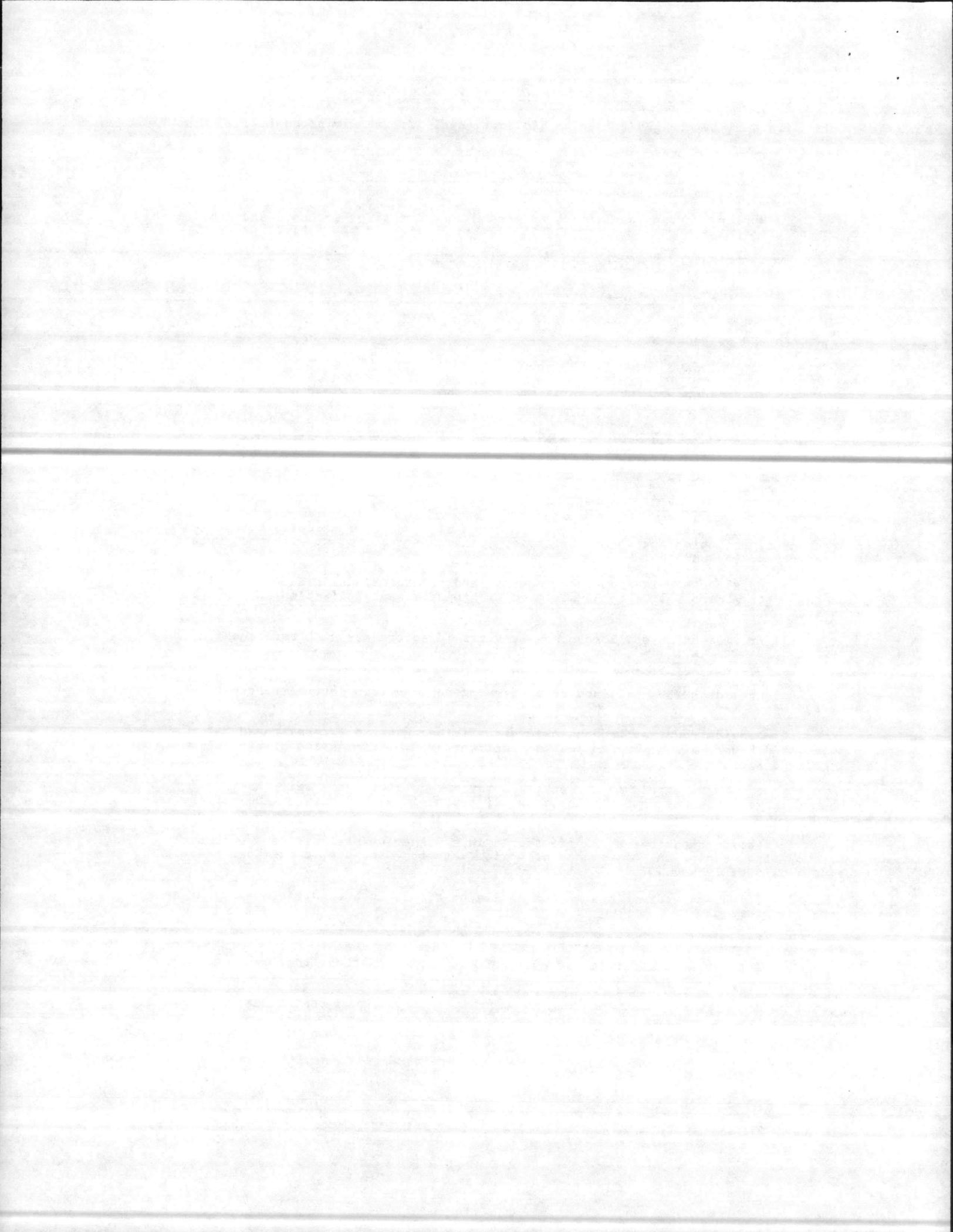
(b) Incompatible HM/HW are stored in a manner with significant potential threat of fire, explosion, or release of toxic fumes or gases due to chemical reaction during spills or leaks.

(c) HM/HW stored in a manner likely to result in a significant discharge to the environment.

g. Assistant Chief of Staff, Logistics will:

(1) Appoint an officer to serve as HMDO for the Logistics Department.

ENCLOSURE (2)



(2) Ensure that suppliers provide hazardous material safety data sheets for all HM procured through open purchase and will provide one copy to unit ordering HM and one copy to the Base Safety Manager.

(3) Develop and implement a program to provide, on a continuing and reimbursable basis, empty containers, labels, labeling equipment, absorbents, and other HM/HW handling supplies required to implement this Order and BO 11090.1B.

(4) Provide contracting services required to dispose of HM or HW for which DRMO is not accountable.

h. Traffic Management Officer, Logistics Department, Marine Corps Base will serve as principal agent for the Commanding General on matters pertaining to HM and HW transportation, and will be responsible for:

(1) Monitoring all HW transportation for compliance with requirements of references (a), (b) and (c) and related state and federal regulations.

(2) Providing transportation services and related record keeping required for implementation of this Order and which are not available from the Defense Reutilization and Marketing Officer (DRMO) or the organization generating the HM/HW.

1. Assistant Chief of Staff, Manpower will:

(1) Develop and implement a comprehensive HW personnel training plan meeting the requirements of reference (b) and related State of North Carolina regulations.

(2) Coordinate local implementation of the Marine Corps Hazardous Material Information System, per MCO 5100.2S and provide safety data and related technical support to HMDC's, HMDO's and other cognizant officials as required to implement this Order.

j. Officer in Charge, Preservation, Packaging and Packing (PP&P) Section, 2dFSSG will provide PP&P support (in accordance with established regulations and procedures) to HMDO's, HMDC's, TMO and DRMO required to accomplish the following:

(1) Identification of type of containers and labeling required for compliance with reference (a) and this Order.

(2) Packaging of HM/HW required for safe storage and transportation during disposal per this Order.

(3) HM transportation certification required for compliance with reference (c).

k. Defense Reutilization and Marketing Officer (DRMO) will:

(1) Operate the base Long-Term Hazardous Waste Storage Facility at the TP-451 complex in accordance with state permit issued under regulations promulgated under references (a) and (b).

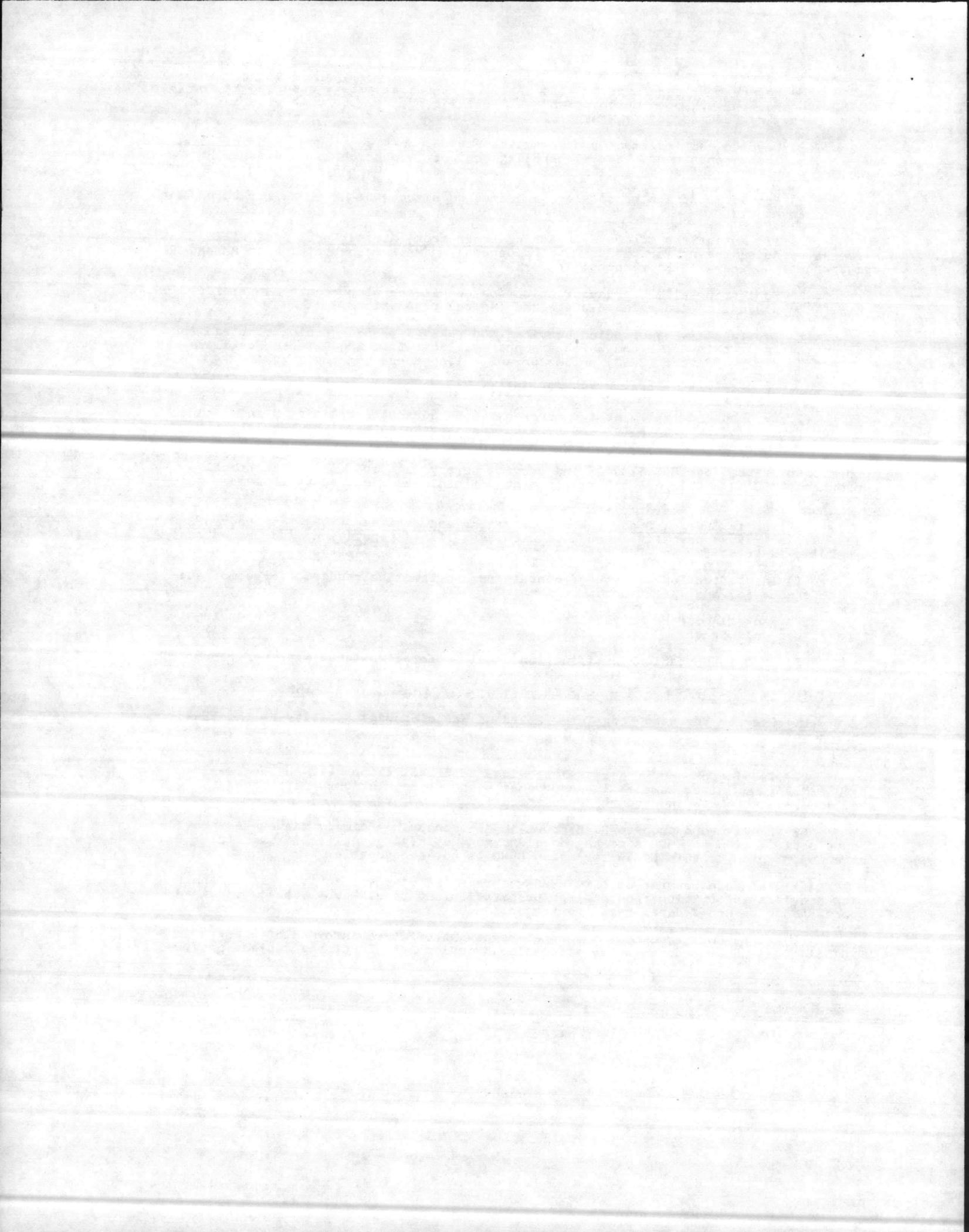
(2) Provide HM and HW disposal services to organizations within the Camp Lejeune/MCAS, New River complex in accordance with DOD regulations, references (a) and (b), and related state and federal regulations.

(3) Receive and process HM/HW turn-in documents in a timely manner and provide prompt notification to HMDO's of any document not satisfying applicable turn in criteria or which contain HM/HW for which DRMO is not accountable.

(4) Maintain records of DRMO HM/HW storage and disposal activity in a manner which provides information required for preparation and timely submittal of required reports to state and federal regulatory agencies.

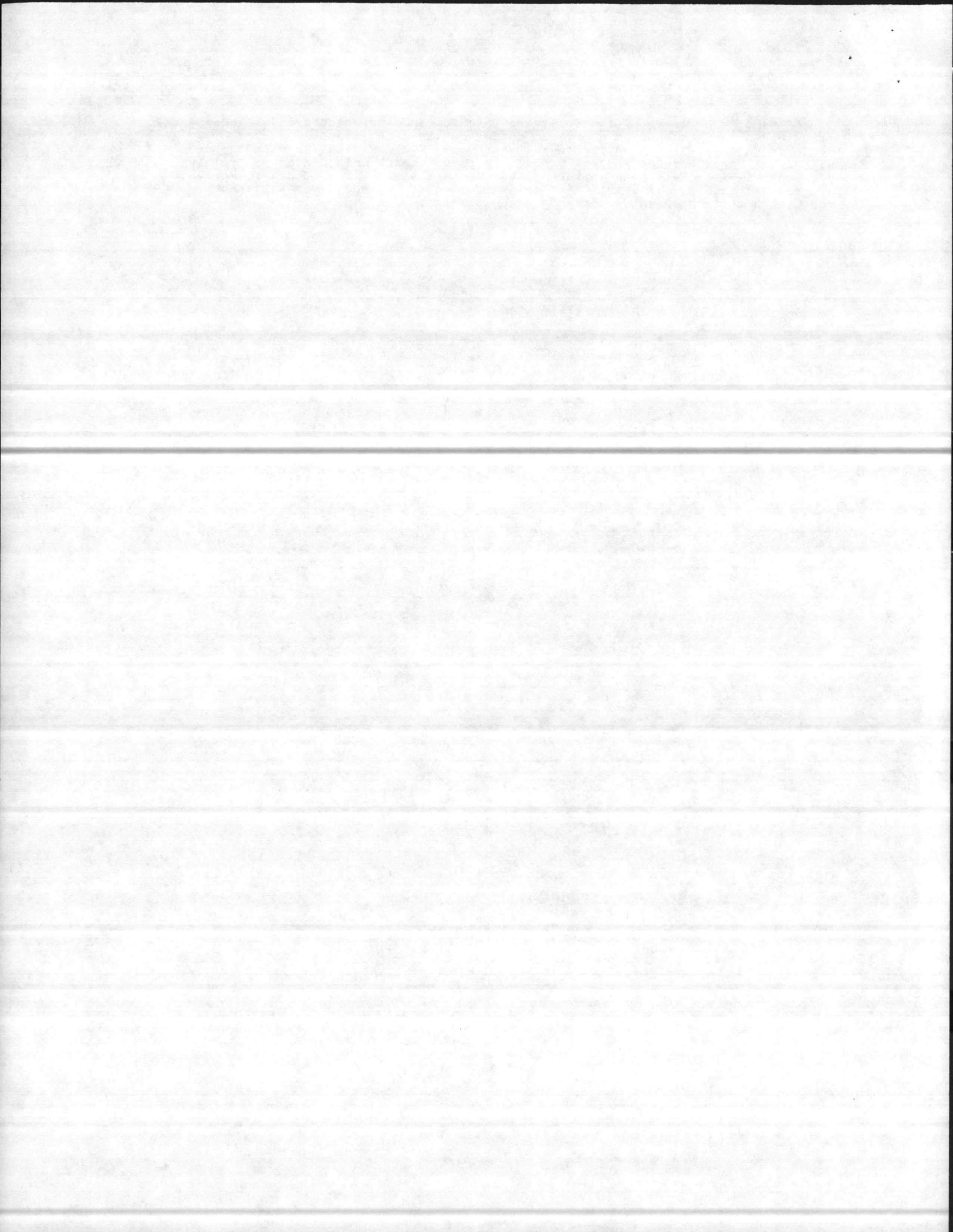
(5) Keeps HMDC's, HMDO's and other cognizant officers informed of changes in DRMO policies and procedures which affect local implementation of the subject program.

ENCLOSURE (2)



1. Commanding Officers of the following Base Commands/Organizations will designate a Primary and Alternate HMDO to carry out duties outlined in 1a and 1b above:
Marine Corps Engineer School; Rifle Range Detachment; Field Medical Service Support School; Marine Corps Service Support School; Reserve Support Unit; Infantry Training School; Support Battalion; Headquarters Battalion; Assistant Chief of Staff, Morale, Welfare and Recreation; Assistant Chief of Staff, Logistics, and Base Maintenance Officer within their respective commands/organizations.

ENCLOSURE (2)



HAZARDOUS WASTE TRAINING REQUIREMENTS AND GUIDELINES

1. Hazardous waste (HW) training is a specific requirement of state and federal regulations promulgated under the Resource Conservation and Recovery Act (RCRA). A review of RCRA requirements and the actual HW activity aboard the Camp Lejeune/Marine Corps Air Station, New River complex indicates that a relatively small percentage of personnel require highly specialized HW training. Generally, the requirements for the remaining personnel involved in HW management are satisfied by routine on-the-job training and related safety and fire-prevention training readily available locally. Providing this training will have minor impact on organizational commanders, in that training required is directly job related. Attachment (A) Part II outlines the minimum HW training required for all categories of employees identified in Section 2 below.

2. For the purpose of these guidelines, only those personnel directly involved in HW handling, storage and disposal will be subject to the HW training documentation requirements of RCRA. A special HW training record, i.e., Attachment (A) Part I or II (or equivalent) will be developed for the following personnel:

a. All Hazardous Material Disposal Officers (HMDO), Hazardous Material Disposal Coordinators (HMDC), and alternate HMDO's and HMDC's.

b. Defense Reutilization and Marketing Officer (DRMO) and subordinate personnel routinely involved in HW handling, storage, turn-in and disposal.

c. Deputy Traffic Management Officer (TMO) and subordinate personnel involved in transportation and related certification of HW for shipment per DOT regulations.

d. Personnel assigned to work places meeting the definition of HW generators, HW accumulation areas, or satellite HW accumulation areas and involved in one or more of the following:

- (1) Collection and storage of HW.
- (2) Inspection, and related follow-up, of HW handling/storage areas.
- (3) Response to HW spills and related emergencies.
- (4) Preparation and submittal of HW turn-in documents.

3. Other activity personnel providing professional and technical support to HW management include the following:

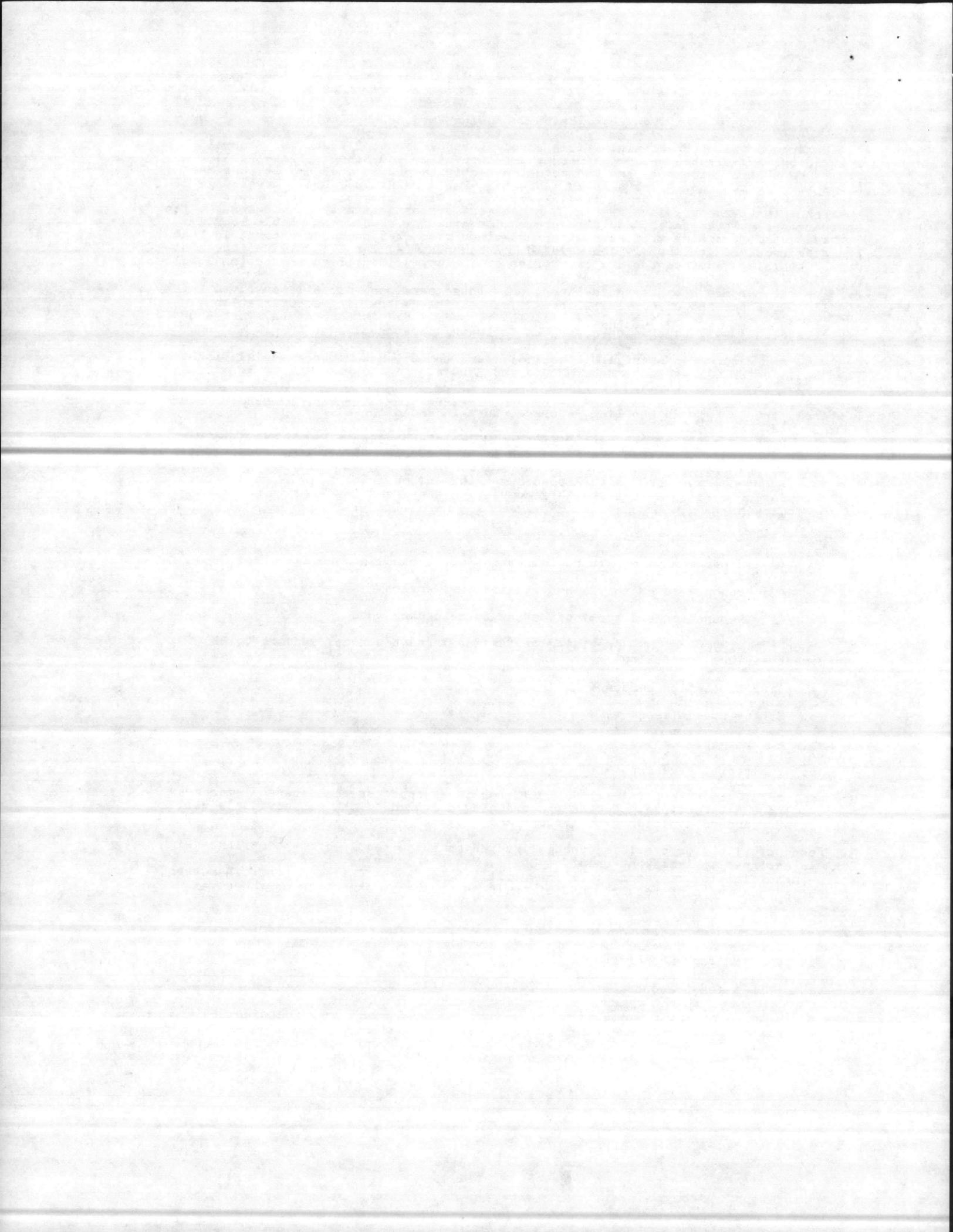
- a. Fire Protection personnel
- b. Safety specialists
- c. Environmental staff
- d. Industrial hygienists

Preparation of Attachment (A) Part I or II for these staff specialists and emergency personnel are not required. Duties and training provided to these individuals will consist of standard position descriptions and civilian personnel records.

4. Responsibility for providing specialized HW training required for compliance with RCRA is assigned to Assistant Chief of Staff, Manpower, Marine Corps Base. The following officials are responsible for notifying Assistant Chief of Staff, Manpower, or specialized training requirements of their subordinates and other personnel as shown.

- a. The DRMO for self and subordinates
- b. The TMO for subordinates
- c. HMDC's for personnel shown in 2d above within HMDC's cognizance

ENCLOSURE (3)



d. Director, Natural Resources and Environmental Affairs Division (NREAD) for subordinates and primary and alternate HMDC's and HMDO's.

Organizational commanders are responsible for developing and implementing training plans and procedures to provide RCRA required training and maintain records outlined in Attachment (A). Organizational commanders will ensure that all new/newly assigned personnel are provided appropriate HW training and close supervision required to comply with RCRA and applicable personnel safety fire prevention and occupational health standards. Organizational commanders will notify HMDC's of HW training requirements. Notification will include names and addresses of persons to be trained and an accurate description of the training required. HMDC and Assistant Chief of Staff, Manpower representative will coordinate the scheduling and funding of specialized HW training.

5. Records of HW training must be maintained for each employee for three years after employee transferred or terminated, except as follows: If an employee is transferred to a HW related position within the Camp Lejeune/Marine Corps Air Station, New River complex, the HW training records will be transferred to the new organization. Responsibility for maintaining official files of HW training records are as follows:

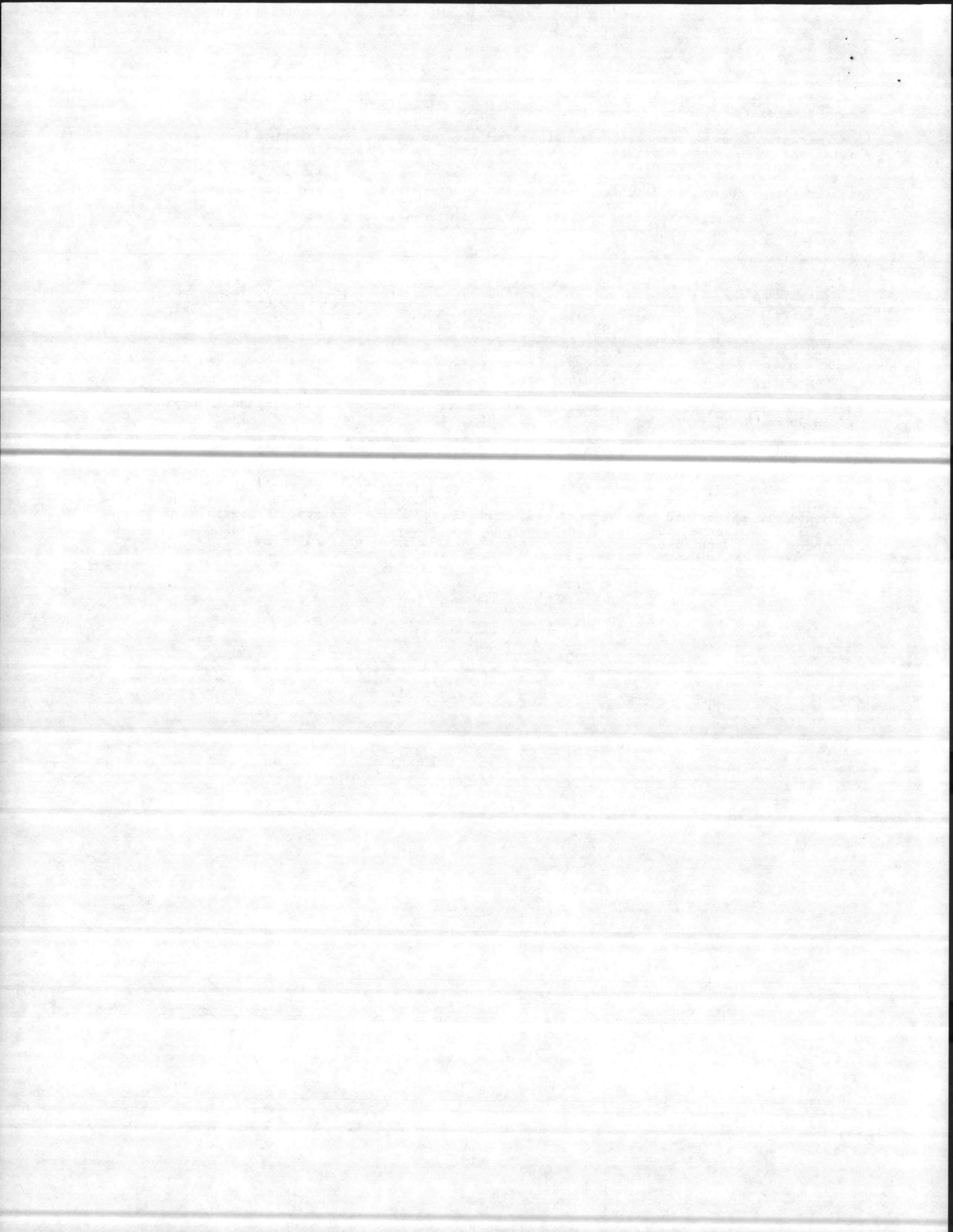
a. HMDC's will maintain records of HW training for HMDC's, HMDO's and alternate HMDC's and HMDO's within their cognizance.

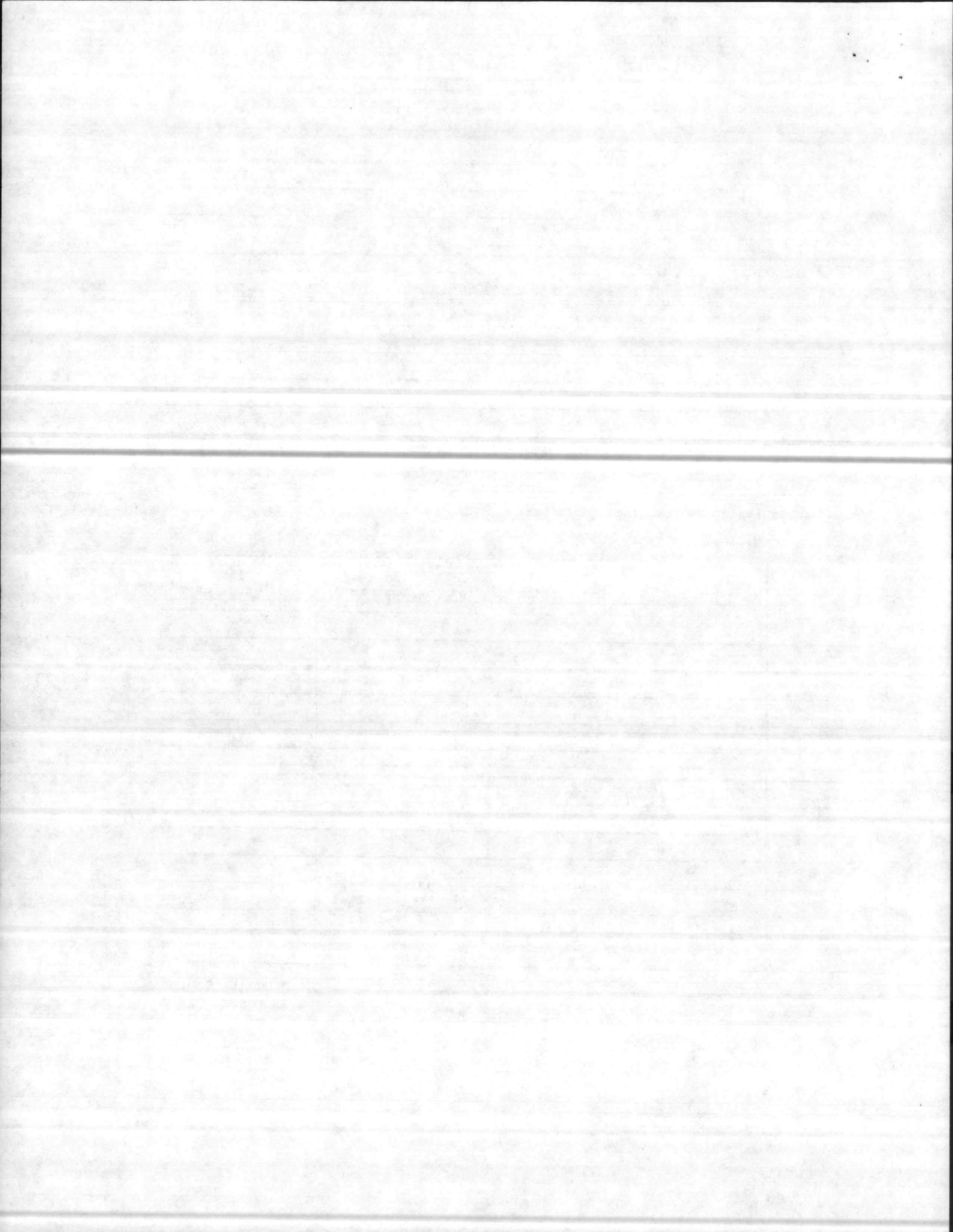
b. DRMO will maintain HW training records for all employees identified in paragraph 2b above.

c. TMO will maintain HW training records for all employees identified in paragraph 2c above.

d. HW training records for all employees identified in paragraphs 5(a)-5(c) will be maintained on Attachment (A) Part I. Records of personnel identified in paragraph 5(d) will be maintained on Attachment (A) Part II. HMDO will maintain HW training records for personnel identified in paragraph 5(d) above. A copy of training records for personnel identified in paragraph 5(d) above will be maintained in HWMSOP.

ENCLOSURE (3)





PART II

MINIMUM LEVELS AND RECORD KEEPING FOR HAZARDOUS WASTE MANAGEMENT ORIENTATION TRAINING

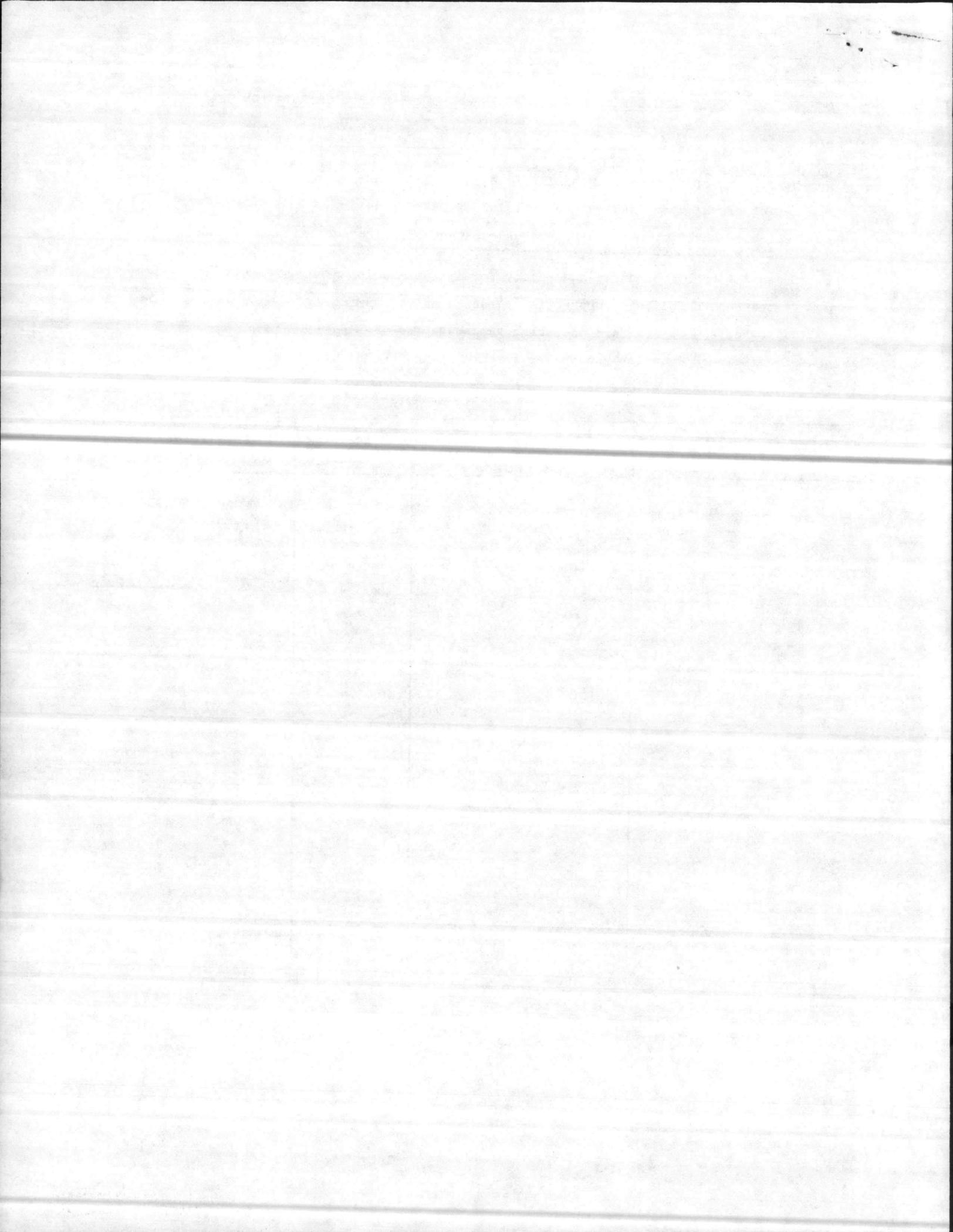
1. Name of Organization: _____
2. Description of Training: The personnel shown below were provided a minimum of one and one-half hours of on-the-job training covering the following:
 - a. Review of the types and characteristics of HM/HW handled.
 - b. Review of activity oil and hazardous substance spill prevention and contingency plan contained in BO 11090.1_.
 - c. Organizational procedures and policy for implementation of BO 6240.5.
 - d. Procedures to follow in protecting personal safety during HM/HW emergencies.
 - e. Review of the HW Standard Operating Procedure for the organization.

The training included question and answer session at the end of training.

3. Personnel Training Provided to:

Name of Trainee	Name of Trainer	Training Date	Trainer/Trainee Signatures

Appendix A to
ENCLOSURE (3)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30355

4WD-RM

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

~~AUG 14 1986~~

AUG 14 1986
General J. E. Cassity
Commanding General
Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

Re: Hazardous Waste Inspection

Dear General Cassity:

On June 26 and 27, 1986, an inspection was conducted to determine whether Camp Lejeune was in compliance with its storage permit for hazardous waste, as well as general transporter and generator requirements for hazardous waste management. The enclosed report and inspection checklist indicates that Camp Lejeune is not in compliance with applicable requirements.

The violations in the enclosed report will be addressed under a separate letter by the State of North Carolina or this Agency.

If you should have any questions, please contact David Ellision at 404/347-7603.

Sincerely yours,

A handwritten signature in cursive script that reads "Allan E. Antley".

Allan E. Antley, Chief
Waste Compliance Section
Residuals Management Branch
Waste Management Division

Enclosure

cc: William Meyer, NCDHS

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RCRA SITE INSPECTION

1. Inspector and Author of Report

David G. Ellison
Environmental Engineer

2. Facility Information

U. S. Marine Corps Camp Lejeune (USMC)
NC Highway 24 & US Highway 16
Camp Lejeune, NC 28542
NC6 170 022 580

3. Responsible Official

Danny Sharpe
Head of Soil, Water and Environmental Branch

4. Inspection Participants

David Ellison, USEPA, Lead inspector
Jerry Rhodes, North Carolina Solid & Hazardous Waste Management
Branch (NCSHWMB)
Bill Morris, NCSHWMB
Danny Becker, USMC
Danny Sharpe, USMC
Julian Wooten, USMC

5. Date and Time of Inspection

June 26-27, 1986 - 9:00 a.m.

6. Applicable Regulations

40 CFR Parts 262, 263, 264, and 265

7. Purpose of Survey

The Hazardous and Solid Waste Amendments of 1984 require an annual inspection of all federal facilities that treat, store, or dispose of hazardous waste.

8. Facility Description

The USMC base is located in Jacksonville, North Carolina. The base is the most complete amphibious training base in the world. The main mission of the base is to provide housing, training, logistic and administrative support for marine units, conduct specialized schools

1. Insecticides and Antidotes

David G. Ellison

Environmental Inspector

2. Facility Inspections

U.S. Marine Corps

10 Highway 14, Box 100

Camp Lejeune, NC 28542

3. Responsible District

Danny Shupe

Lead Soil Inspector

4. Inspector's Organization

David Ellison, USEPA Lead Inspector

Berry Rhodes, North Carolina State University

Ernie (NCSU)

Bill Morris, NCSU

Danny Baskett, NCSU

Henry Evans, NCSU

5. Site and Line of Inspection

6. Facilities Involved

40 Camp Lejeune

Marine Corps

7. The District and State

Inspection of all hazardous waste

8. Facility Description

The USMC base is located on the

is the major military base in the

region of the base is the

and the base is a major

and other training as needed, and receive and process personnel as assigned, and conduct combat training as needed. The facility was issued a hazardous waste Part B permit for storage in containers on September 7, 1984.

9. Findings

On June 26 and 27, 1986, an inspection was conducted at the USMC by EPA and the State of North Carolina. The USMC is a generator of hazardous wastes and stores hazardous waste in containers. The facility was issued a Part B permit for storage in containers on September 7, 1984.

The facility is operated by DRMO, who is responsible for the management of hazardous waste. The USMC is the owner of the facility who oversees the management of hazardous waste under the Natural Resource and Environmental Affairs Division. The Traffic Manager Officer (TMO) is responsible for the transportation of hazardous waste.

Hazardous waste is generated at approximately 60 sites (facility was unsure of the actual number) and then transported by TMO to the permitted storage area. The permitted storage area has two areas for storage of hazardous waste, buildings TP-451 and TC-863. The capacity in 55 gallon drums of the storage areas are: 224 drums in TP-451 and 504 drums in TC-863. The waste stored in the two storage buildings was in excellent condition. Hazardous materials are also stored in these two buildings. The following generating sites were inspected: B901, Ordnance Maintenance; B909, Motor Pool; and Building 915, Packing, Preservation, and Packing.

The USMC stores used batteries that are picked up by a reclaimer. The base drains batteries that are leaking and stores the electrolyte solution drained from the batteries in drums around the facility. The electrolyte solution is treated by the USMC. The electrolyte solution is a hazardous waste because it is corrosive (D002). Batteries drained are stored on pallets upside down on the ground and then are transported off-site by the reclaimer.

Safety Kleen currently services six sites where hazardous waste solvents are generated. The various tanks are serviced monthly by Safety Kleen. TMO is responsible for signing the manifest as the generator at the various sites. The base is currently considering the possibility of Safety Kleen servicing other areas at USMC base.

TMO is responsible for transporting all waste from the generating sites to the permitted storage buildings. The USMC is also a transporter of hazardous waste, and TMO is responsible for transporting the waste. TMO transports hazardous waste from the USMC Air Station - New River Base to the Camp Lejeune permitted storage buildings.

The USMC generates a large quantity of waste oil. The waste oil is stored at each generating site, then transported to one of four areas for storage before transportation to a burner. The waste oil has been sampled and hazardous waste, specifically halogenated solvents, has been detected.

The Assistant Chief of Staff of Facilities, Colonel T. J. Dalzell, was briefed on the violations found during the inspection. Attached is a copy of the inspection checklist. The following is a list of noncompliance items noted during the inspection:

40 CFR 262.21 - Manifest (Required Information)

On the February 28, 1986, manifest, no generator ID number was used as required.

40 CFR 262.34(a)(1) - Subpart I

This Section requires the facility to comply with Subpart I. The facility has failed to comply with Subpart I, specifically 40 CFR 265.174. At building 909, weekly inspections have not been performed. No inspections were performed for drums of electrolyte solution stored near building 909.

40 CFR 262.34(a)(2) - Accumulation Date

The facility has failed to mark on each container of electrolyte solution from batteries the date upon which each period of accumulation begins.

40 CFR 262.34(a)(3) - Labeling Containers

The facility has failed to label containers of electrolyte solution from batteries with the words "Hazardous Waste".

40 CFR 262.34(a)(4)

The facility has failed to comply with Subparts C and D in 40 CFR Part 265 and with 265.16 as specifically stated below:

40 CFR 265.16 - Personnel Training

None of the generators inspected had a personnel training plan. The generators failed to have the documents and records required by 265.16(d). The only record maintained was a log sheet showing the training an individual received. An adequate number of personnel were not trained at all generating sites. The generators need back-up personnel to manage the hazardous waste when the primary individual is on leave. TMO, who signs the manifest as the generator for Safety Kleen services, had no training plan and had an individual sign the manifest who had no hazardous waste training.

The USMC generated large amounts of waste which is stored at the facility. The waste is stored in areas for storage and disposal. The waste has been stored in a number of areas and is being disposed of by the contractor.

The Assistant Chief of Staff of the USMC was briefed on the status of the waste disposal program. The program is being managed by the contractor and is being monitored by the USMC.

40 CFR 261.11 - Manifests and tracking information
On the February 28, 1994, manifest was reviewed.

40 CFR 261.11(a)(2) - Landfills
This section requires the facility to comply with the following:

261.11(a)(2)(i) - The facility must have a permit from the state or local authority having jurisdiction for the disposal of hazardous waste. The permit must include the following conditions:

40 CFR 261.11(a)(2)(i) - The facility must have a permit from the state or local authority having jurisdiction for the disposal of hazardous waste. The permit must include the following conditions:

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40 CFR 261.11(a)(2)(i) - The facility must have a permit from the state or local authority having jurisdiction for the disposal of hazardous waste. The permit must include the following conditions:

The generator of the waste must provide the following information to the transporter:

- The name and address of the generator.
- The name and address of the transporter.
- The name and address of the receiving facility.
- The quantity and description of the waste.
- The hazard class and code of the waste.
- The proper shipping name of the waste.
- The hazard label for the waste.
- The hazard placards for the waste.
- The hazard identification number for the waste.
- The emergency response information for the waste.
- The manifest number.
- The date of shipment.
- The signature of the generator.
- The signature of the transporter.
- The signature of the receiving facility.

40 CFR 265.31 - Maintenance and Operation of Facility

The facility has not been maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment. The USMC has placed batteries upside down on pallets on the ground. These batteries contain hazardous waste and the residue could leak out and possibly has at building 909 where the soil is discolored.

40 CFR 265 Subpart D - Contingency Plan

None of the generators had a contingency plan and this includes TMO. The contingency plan must meet the requirements of this section.

40 CFR 262.42(a) - Exception Reporting

On all manifests (six) for Safety Kleen Services, the USMC has failed to receive a copy of the manifest with the written signature of the owner or operator of the designated facility within 35 days and have failed to contact the designated facility and/or the transporter to determine the status of the hazardous waste.

40 CFR 262.42(b) - Exception Reporting

The facility has failed to submit an Exception Report for all the Safety Kleen Services where the USMC has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the transporter.

Permit Condition - Inspection Log

The USMC has changed the inspection log to a better form than what was in the permit. This form should be changed in the permit.

40 CFR 264.16 - Personnel Training

The facility has failed to revise the personnel training plan to show all individuals involved in hazardous waste. Several individuals have been added and received training in hazardous waste, but the training plan fails to recognize these positions.

Permit Condition - Container Storage

The permit requires drums be stacked no higher than two high. At the permitted storage buildings, boxes (crates) the same size as drums were stacked higher than two drums.

40 CFR 222.11 - Information and Records

The facility has not been required to maintain records of the availability of the information and records of the facility. The facility has not been required to maintain records of the availability of the information and records of the facility. The facility has not been required to maintain records of the availability of the information and records of the facility.

40 CFR 222.12 - Confidentiality

None of the information and records of the facility are confidential. The facility has not been required to maintain records of the availability of the information and records of the facility.

40 CFR 222.13 - Access to Information

All records of the facility are available to the public. The facility has not been required to maintain records of the availability of the information and records of the facility. The facility has not been required to maintain records of the availability of the information and records of the facility.

40 CFR 222.14 - Freedom of Information Act

The facility has not been required to submit an annual report to the public. The facility has not been required to submit an annual report to the public. The facility has not been required to submit an annual report to the public.

40 CFR 222.15 - Inspection

The USMC has granted the public access to the information and records of the facility. The facility has not been required to maintain records of the availability of the information and records of the facility.

40 CFR 222.16 - Enforcement

The facility has not been required to submit an annual report to the public. The facility has not been required to submit an annual report to the public. The facility has not been required to submit an annual report to the public.

40 CFR 222.17 - Penalties

The facility has not been required to submit an annual report to the public. The facility has not been required to submit an annual report to the public. The facility has not been required to submit an annual report to the public.

Permit Condition - Modification

The USMC has failed to notify the State that the operator of the facility has changed names from DPDO (Defense Property Disposal Officer) to DRMO.

10. Conclusions

The condition of containers and the handling of hazardous waste at the permitted storage buildings was excellent. The USMC has several minor violations that need to be corrected for the permitted site. The major problems, violations, were found at the generating sites. One of the major problems at the generating sites is the constant change of personnel. Due to constant change of personnel, it is difficult to adequately train the marines. The USMC have been exploring the possibilities of increasing the number of sites where a contractor would be servicing the various locations solvents are used. Some problems may be eliminated if a contractor handles the solvents. Another major problem the USMC has had is that solvents have been detected in the waste oil. If solvents continue to be detected in the waste oil, then the facility would be required to obtain a permit or handle the waste as a generator.

11. Recommendations

The contingency plan presented in the permit and approved when the permit was issued fails to address adequately all items that should be addressed. It is recommended that the contingency plan be revised to address the following comments:

- ° Pursuant to 40 CFR 264.52(e), the contingency plan should include a list of emergency equipment at the facility, the location of this equipment and a physical description of each item on the list, and a brief outline of its capabilities.
- ° Pursuant to 40 CFR 264.52(f), the contingency plan should include an evacuation plan for facility personnel where there is a possibility that evacuation could be possible.
- ° The contingency plan should outline the emergency procedures that will be followed as required in 40 CFR 264.56. The base contingency plan needs to be revised to outline in more detail the emergency procedures taken for an emergency. Specifically, the plan fails to address the following parts: 40 CFR 264.56 (d), (e), (h), (i), and (j).

The USMC needs to research and determine how solvents are being detected in the waste oil. The State and EPA will be investigating the waste oil practices at Camp Lejeune. If solvents continue to be detected in the waste oil, the waste oil must be handled as a hazardous waste.

Formal Conclusions - Recommendations

The following conclusions were reached by the committee after a thorough review of the information presented to it. It is recommended that the following actions be taken:

Conclusions

The committee has concluded that the current situation is not satisfactory and that immediate action is required. The committee has identified several key areas for improvement and has recommended specific measures to address these issues. It is the committee's belief that these actions will lead to a more efficient and effective organization.

Recommendations

The committee recommends that the following actions be taken: 1. Review the current organizational structure and identify areas for improvement. 2. Implement a new system of communication to improve the flow of information. 3. Provide training and development opportunities for all employees. 4. Establish a system of regular communication between management and employees. 5. Review the current budget and identify areas for cost savings.

It is the committee's belief that these actions will lead to a more efficient and effective organization. The committee is confident that these recommendations will be accepted and implemented.

The committee has reviewed the information presented to it and has concluded that the current situation is not satisfactory. It is recommended that the following actions be taken:

1. Review the current organizational structure and identify areas for improvement. 2. Implement a new system of communication to improve the flow of information. 3. Provide training and development opportunities for all employees. 4. Establish a system of regular communication between management and employees. 5. Review the current budget and identify areas for cost savings.

The committee has concluded that the current situation is not satisfactory and that immediate action is required. The committee has identified several key areas for improvement and has recommended specific measures to address these issues. It is the committee's belief that these actions will lead to a more efficient and effective organization.

Due to the violations found, a follow-up inspection is needed to ensure the items found in noncompliance during the inspection are corrected.

12. Recommended Enforcement Action

The State has the lead responsibility for taking enforcement action for the violations detected. The enforcement action must be taken in accordance with the Enforcement Response Policy.

13. Signed

David G. Ellison
David G. Ellison, Inspector

8/4/86
Date

14. Concurrence

Beverly J. Foster for
John C. Lark, Jr., Chief
East Unit, Waste Compliance
Section
8/4/86

Allan E. Antley
Allan E. Antley, Chief
Waste Compliance Section

Attachments

Due to the violation of the following provisions, the respondent is hereby notified that the respondent is in violation of the following provisions:

12. Respondent is hereby notified that the respondent is in violation of the following provisions:

The State has the right to regulate the respondent's activities in accordance with the following provisions:

13. signed

[Handwritten signature]

Section 14

[Handwritten signature]
John C. [unclear]
East [unclear] [unclear]
Section 14

Attachment

USMC Camp Lejeune NC 6170022-580 Dns/lo
 Name of Site EPA I.D.
Jacksonville 6-26-86
 Location Inspection Date
 Signature of Inspector: David J. Ellis
 Signature of Facility Cont: Julian [unclear]
 Compliance Date

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART B - GENERAL FACILITY STANDARDS

SUBPART C - PREPAREDNESS AND PREVENTION

- 1. Required Notices (264.12)
 - foreign shipments (a)
 - off-site notification (b)
 - new owner/operator (c)
- 2. General Waste Analysis (264.13)
 - chemical/physical lab reports (a)(1)
 - review/repeat of analysis (a)(3)(4)
 - inspect/analyze (a)(4)
 - analysis plan (b)(c)
- 3. Security (264.14)

(The facility may be exempt under (a)(1)(2))

 - 24-hour surveillance system (b)(1)
 - or
 - artificial/natural barrier (b)(2)(i)
 - and
 - entry control (b)(2)(ii)
 - danger sign(s) (c)
- 4. General Inspection Requirements (264.15)
 - inspect for malfunctions, operator errors, discharges, etc. (a)(1)(2)
 - inspect monitoring, safety and emergency equipment, etc. (b)(1)
 - written schedule (b)(2)(3)
 - remedial action (c)
 - inspection log (d) *changed from form in permit*
- 5. Personnel Training (264.16)
 - program completed (a)(1)(b)
 - annual review (c)
 - documents/records (d)(e) *See comments below*
- 6. General Requirements for Ignitable, Reactive or Incompatible Waste (264.17)
 - proper handling/"No Smoking" signs (a)(b)
 - documentation (c)

- 8. Required Equipment (264.32)
 - communication/alarm system (a)
 - telephone or two-way radio (b)
 - fire, spill, and decontamination equipment (c)
 - adequate pressure and volume of water/foam equipment (d)
- 9. Testing and Maintenance of Equipment (264.33)
 - as required
- 10. Access to Communications or Alarm System (264.34)
 - immediate (a)(b)
- 11. Required Aisle Space (264.35)
 - per permit condition *double stacked pallets*
- 12. Arrangement with Local Authorities (264.37) *Base out*
 - of changes with wastes characteristics (a)
 - documentation of refusal (b)

SUBPART D - CONTINGENCY PLAN AND EMERGENCY PROCEDURES

- 13. Amendment of Contingency Plan (264.54)
 - permit revision (a) *No changes*
 - emergency failure (b)
 - facility design change (i.e. construction operation) (c)
 - coordinators change (d)
 - equipment change (e)
- 14. Emergency Coordinator (264.55)
 - on call *Fire chief*
 - authority to commit *on call 24hr/day*

X 264.52 (e) - list of equipment
 X 264.52 (f) - evacuation plan

Comment: not all positions listed with job description, Plan needs revising

U.S. Army
Department of the Army
Washington, D.C. 20315

REPORT OF THE
INSPECTOR GENERAL
ON THE
OPERATIONS OF THE
ARMY

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6. Emergency Procedures (264.56)

- activation of alarm system (a)(1) ✓
- notification to State/Local agencies of discharge (a)(2), (d)(1)(2) ✓
- hazard assessment (c) ✓
- reasonable prevention measures (e) ✓
- monitor for leaks, pressure buildup, etc. (f) ✓
- proper management of recovered waste, contaminated soil or surface water (g) ✓
- compatibility with contaminated areas (h)(1) ✓
- emergency equipment cleaned (h)(2) ✓
- notification of compliance (i) ✓
- written report (15 days)/operating record notation (j) ✓

NEEDS more detail explanations

SUBPART E - MANIFEST SYSTEM, RECORDKEEPING

16. Use of Manifest System (264.71)

- sign, date (a)(1) ✓
- note discrepancies (a)(2) ✓
- copy to transporter (a)(3) ✓
- copy to generator (30 days) (a)(4) ✓
- TSDF copy (a)(5) ✓
- rail or water transporter (b)(1)(2)(3)(4)(5) ✓
- generator compliance (c) ✓

17. Manifest Discrepancies (264.72)

- bulk discrepancies (a)(1) ✓
- batch discrepancies (a)(2) ✓
- written report, if required (b) ✓

18. Operating Record (264.73)

- written (a) ✓
- quantity, handling methods, dates (b)(1) ✓
- location/quantity with cross reference (b)(2) ✓
- waste analysis (b)(3) ✓
- incident reports (b)(4) ✓
- inspection record (b)(5) ✓
- monitoring, testing results (for incinerators) (b)(6) ✓
- notice to generators (b)(7) ✓
- closure/post closure cost (b)(8) NA

19. Availability, Retention, and Disposition of Records (264.74)

- access to records (a) ✓
- retention (b) ✓
- records submitted (c) ✓

20. Annual Report (264.75)

- submit by March 1 (a)(b)(c)(d)(e)(f)(g)(h)

21. Unmanifested Waste Report (264.76)

- within 15 days (a)(b)(c)(d)(e)(f)(g) ✓

22. Additional Reports (264.77)

- Section 264.56(j) report (a) ✓
- facility closure (c) ✓

SUBPART G - CLOSURE AND POST-CLOSURE

23. Closure Plan; Amendment of Plan (264.112)

- written (a) ✓
- inventory modification (a)(2) ✓
- amendment (b) ✓
- 180 day notice (c) ✓

24. Disposal or Decontamination of Equipment (264.113)

- equipment disposal/decontamination

25. Post-Closure Plan; Amendment of Plan (264.118)

- written (a) ✓
- amendment/modification (b)(c) ✓

SUBPART H - FINANCIAL REQUIREMENTS

N/A Federal Facility

26. Cost Estimate for Closure (264.142)

- written (a)
- anniversary adjustment (b)
- change adjustment (c)
- available for inspection (d)

27. Financial Assurance for Closure (264.143)

- yes;
- Specify form _____

28. Estimate for Post-Closure Care (264.144)

- written (a)
- anniversary adjustment (b)
- change adjustment (c)
- available for inspection (d)

29. Financial Assurance for Post-Closure (264.145)

- yes;
- Specify form _____

30. Liability Requirements (264.147)

- sudden occurrences (a)
- non-sudden occurrences (b)

31. Incapacity of Owners or Operators, Guarantors or Financial Institutions (264.148)

- compliance (a)(b)

Submit by March 31st of each year.

50 Annual Report (5010)

Records submitted to:

Department of Health and Human Services

Environmental Health Administration

Office of Environmental Health

Control (EH-111)

Washington, D.C. 20461

Attention: Director

17. Submit this report to:

State or local health department

or other appropriate authority

18. Copy to generator (5010)

19. Copy to generator (5010)

20. Copy to generator (5010)

21. Copy to generator (5010)

22. Copy to generator (5010)

23. Copy to generator (5010)

24. Copy to generator (5010)

25. Copy to generator (5010)

26. Copy to generator (5010)

27. Copy to generator (5010)

Name of Site USMC Camp Lejeune

EPA I.D. NC 6170022580

Inspection Date 6-26-8

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

1. Condition of Containers (264.171)

- leakage ✓
- past leakage (evidence) ✓
- severe rusting ✓
- structural defect ✓

1. General Operating Requirements (264.192)

- incompatible materials (a)(1)(2)
- overfilling prevention (b)(1)(2)

2. Compatibility of Waste with Containers (264.172)

- visual evidence of noncompliance ✓
(leakage, corrosion)

2. Inspections (264.194)

- overfilling control equipment (daily) (a)(1)
- monitoring data (daily) (a)(2)
- uncovered tank level (daily) (a)(3)
- above ground construction materials (weekly surrounding area (weekly) (a)(5)
- assessment of tank condition (b)
- spill response procedures (c)

3. Management of Containers (264.173)

- closed (a)
- improper handling or storage (b) *see below violation of permit condition*

3. Closure (264.197)

- residue removal
- decontamination

4. Inspections (264.174)

- weekly (minimum) ✓

4. Special Requirements for Ignitable or Reactive (264.198)

- improper storage (a)(1)(2)(3)
- buffer (b)

5. Containment (264.175)

"With Free Liquids"

- base (free of cracks or gaps) (b)(1)
- run-on prevention (b)(4) ✓
- removal of spilled or precipitation (b)(5) ✓
- protect (c) ✓

"No Free Liquids"

- contact with accumulated liquids (c)(2) ✓

5. Special Requirements for Incompatible Waste (264.199)

- mixing (a)
- unwashed tank (b)

6. Special Requirements for Ignitable or Reactive Waste (264.176)

- 15m (50 ft)

6. Air Emissions (264.200)

- proper control equipment (a)(b)(c)

7. Special Requirements for Incompatible Waste (264.177)

- mixing (a)
- unwashed container (b) ✓
- separation (c) ✓

REMARKS: Permit condition - drums stacked only 2 high - boxes (crates) approximately same size as drums were stacked three high

WASTE MANAGEMENT PLAN

1.0 PURPOSE AND SCOPE
2.0 REGULATORY REQUIREMENTS
3.0 WASTE CHARACTERIZATION
4.0 WASTE MANAGEMENT STRATEGY
5.0 WASTE HANDLING AND TREATMENT
6.0 WASTE STORAGE AND TRANSFER
7.0 WASTE TRACKING AND RECORDS
8.0 WASTE EMERGENCY RESPONSE
9.0 WASTE AUDITING AND MONITORING
10.0 WASTE MANAGEMENT PLAN REVIEW

11.0 WASTE MANAGEMENT PLAN APPROVAL
12.0 WASTE MANAGEMENT PLAN IMPLEMENTATION
13.0 WASTE MANAGEMENT PLAN MAINTENANCE

14.0 WASTE MANAGEMENT PLAN TRAINING
15.0 WASTE MANAGEMENT PLAN COMMUNICATION
16.0 WASTE MANAGEMENT PLAN RECORDS

17.0 WASTE MANAGEMENT PLAN MONITORING
18.0 WASTE MANAGEMENT PLAN REPORTING
19.0 WASTE MANAGEMENT PLAN CORRECTIVE ACTION
20.0 WASTE MANAGEMENT PLAN REVIEW

21.0 WASTE MANAGEMENT PLAN APPROVAL
22.0 WASTE MANAGEMENT PLAN IMPLEMENTATION

23.0 WASTE MANAGEMENT PLAN MAINTENANCE
24.0 WASTE MANAGEMENT PLAN TRAINING

25.0 WASTE MANAGEMENT PLAN COMMUNICATION
26.0 WASTE MANAGEMENT PLAN RECORDS

27.0 WASTE MANAGEMENT PLAN MONITORING
28.0 WASTE MANAGEMENT PLAN REPORTING

29.0 WASTE MANAGEMENT PLAN CORRECTIVE ACTION
30.0 WASTE MANAGEMENT PLAN REVIEW

USMC Camp Lejeune NC 6170022580
 Name of Site EPA I.D. *On 5*
 Jacksonville 6-26-86
 Location Inspection Date
 Signature of Inspector *David J. Ellis*
 Compliance Date Signature of Facility Cor *Julian Woolen*

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
 - Subpart D waste (b) ✓
 - Subpart C waste (c)(1)(2) ✓
- 2. EPA Identification Numbers
 - EPA generator number (a) ✓
 - EPA transporter/facility (c) ✓

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
 - proper manifest (a) ✓
 - permitted facility (b) ✓
 - see comments*
- 4. Required Information (262.21)
 - document number (a)(1) ✓
 - generator identification (a)(2) *No ID # on 2/28/86 manifest*
 - transporter identification (a)(3) ✓
 - facility identification (a)(4) ✓
 - D.O.T. description (a)(5) ✓
 - total quantity (a)(6) ✓
 - certification (b) ✓
- 5. Number of Copies (262.22)
 - minimum number ✓
- 6. Use of the Manifest (262.23)
 - generator handwritten signature (a)(1) ✓
 - transporter signature/date (a)(2) ✓
 - retain copy (a)(3) ✓
 - copies to transporter (b) ✓

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
 - D.O.T. compliance ✓
- 8. Labeling (262.31)
 - D.O.T. compliance ✓
- 9. Marking (262.32)
 - D.O.T. compliance (a) ✓
 - "HAZARDOUS WASTE" label (b) ✓
- 10. Placarding (262.33)
 - D.O.T. compliance ✓
- 11. Accumulation Time (262.34)
 - Subpart I; J (a)(1) -
 - accumulation date (a)(2) ✓
 - "Hazardous Waste" (a)(3) ✓
 - Subpart C; D (a)(4)* -
 - personnel training (a)(4)* -

*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
 - manifest retention (a) ✓
 - annual/exception report (b) ✓
 - test/waste analysis (c) ✓

U.S. Environmental Protection Agency

Form 100-1 (Rev. 10-1-79)

Name of Firm

Address (Street, City, State, ZIP)

Product Name (EPA Form 100-1)

Product Number (EPA Form 100-1)

Section B - The Manufacturer

General Requirements (EPA Form 100-1)

Product Name (EPA Form 100-1)

Product Number (EPA Form 100-1)

Product Name (EPA Form 100-1)

Product Number (EPA Form 100-1)

Product Name (EPA Form 100-1)

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Product Name (EPA Form 100-1)

Product Number (EPA Form 100-1)

13. Annual Reporting (262.41)

___ submitted (a)(1-6)

___ submitted (b)

14. Exception Reporting (262.42)

transporter contact (a)

exception report (b)(1)(2)

- REMARKS:
- No Hazardous Waste #'s on 6-6-86 manifest at permitted storage list
 - Tmo signs Safety Kleen manifest as generator. personnel have no formal training conducted recent no training plan, no contingency plan, one individual signing the manifest had received no training
 - Building 909 - weekly inspections have not been pers there is no backup inspector (262.34 a(1))
 - No accumulation dates on hazardous waste label on drums of electrolyte solution drained from batteries.
 - Batteries drained are stored inproper, batteries stored upside down on pallets
 - All generating sites - inadequate personnel train no personnel training plan and no contingency pla this violates 262.34 (c)(4)

13. Annual Report (2022-23)
Submitted: _____
Approved: _____

14. Exception Reporting (2022-23)
Transporter Contact:
Exception Report:

GENERAL
The following information is provided for your information.
The information is for your information only and is not to be used for any other purpose.
Personal information is provided for your information only and is not to be used for any other purpose.

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CONTAINER/TANK INSPECTION FORM - PART 265

USMC Camp Lejeune
Name of Site

NC 617002580
EPA I.D.

6-26-8
Inspection Date

FOR GENERATING SITES

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

- 1. Condition Of Containers (265.171)
 - leakage ✓
 - past leakage (evidence) ✓
 - severe rusting ✓
 - structural defect ✓
- 2. Compatibility Of Waste With Containers (265.172)
 - visual evidence of noncompliance ✓
(leakage, corrosion)
- 3. Management of Containers (265.173)
 - closed (a) ✓
 - improper handling or storage (b) ✓
- 4. Inspections (265.174)
 - weekly (minimum)
- 5. Special Requirements For Ignitable or Reactive Waste (265.176)
 - 15m (50 ft) ✓
- 6. Special Requirements For Incompatible Waste (265.177)
 - mixing (a) ✓
 - unwashed container (b)
 - separation (c)

SUBPART J - TANKS

- 1. General Operating Requirements (265.192)
 - compatibility (a)(b)
 - uncovered tank precautions (c)
 - overflow prevention (d)
- 2. Waste Analysis and Trial Tests (265.193)*
 - *Section not applicable to a generator only
 - waste analysis/trial test
- 3. Inspections (265.194)
 - discharge control equipment (a)(1)
 - monitoring equipment (a)(2)
 - waste level (a)(3)
 - construction material (a)(4)
 - surrounding area (a)(5)
 - assessment schedule/procedures (b)
- 4. Closure (265.197)
 - plan on-site
- 5. Special Requirements For Ignitable Or Reactive Waste (265.198)
 - properly stored (a)(1)(2)(3)
 - buffer requirements (b)
- 6. Special Requirements For Incompatible Wastes (265)
 - properly stored (a)
 - tank washed (b)

REMARKS: _____

REMARKS:

UNSATISFACTORY

TESTING

Special Requirements for Inspection

Water (100-170)

Special Requirements for Inspection

Inspection (100-170)

Name of Site USMC Camp Lejeune EPA I.D. NC6170022580 Onslow
 Location Jacksonville Inspection Date 6-26-86 Signature of Inspector(s) [Signature]
Count

Compliance _____ Signature of Facility Contact _____

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. EPA Identification Number (263.11)
 - yes (a)(b) ✓
- 2. Transfer Facility Requirements (263.12)
 - 10 days limit ✓

SUBPART B - MANIFEST SYSTEM/RECORDKEEPING

- 3. The Manifest System (263.20)
 - generator signature (a) ✓
 - transporter signature/date/copy (b) ✓
 - accompanying manifest (c) ✓
 - delivery compliance (d)(1)(2)(3) ✓
 - bulk shipment-water (e)(1)(2)(3)(4)(5) -
 - rail shipment (f)(1)(2)(3)(4) -
 - foreign shipment (g)(1)(2)(3) -
- 4. Compliance With The Manifest (263.21)
 - designated facility delivery (a)(1) ✓
 - alternate facility delivery (a)(2) ✓
 - designated transporter delivery (a)(3) ✓
 - designated foreign facility (a)(4) ✓
 - generator contact (b) ✓
- 5. Recordkeeping (263.22)
 - signed copies (a) ✓
 - bulk shipment-water (b) -
 - rail shipment (c)(i)(ii) -
 - foreign shipment (d) -
 - extended retention (e) -

SUBPART C - HAZARDOUS WASTE DISCHARGES

- 6. Immediate Action (263.30)
 - immediate action (a) NONE
 - notification (c)(1)(2)
 - water transporter notification (d)
- 7. Discharge Clean-Up (263.31)
 - remedial action NONE

REMARKS: _____
The Traffic Manager office
(Tmo) transports waste from
USMC Air Station New River
to Camp Lejeune storage
area.

USMC Camp ...
Jacksonville

An inspection of your facility was conducted on ...
below with a cross (X)

Subject - GENERAL

Inspection Number (201)

Subject - ...

The ... System (201)

generator ...

transmitted ...

accuracy and ...

development ... (2)

... (2)

... (2)

... (2)

Compliance with the ...

designated ...

... (2)

designated ...

generator ...

2. Recordkeeping (201)

signed copies ...

bulk shipment ...

... (2)

... (2)

Use Form ...

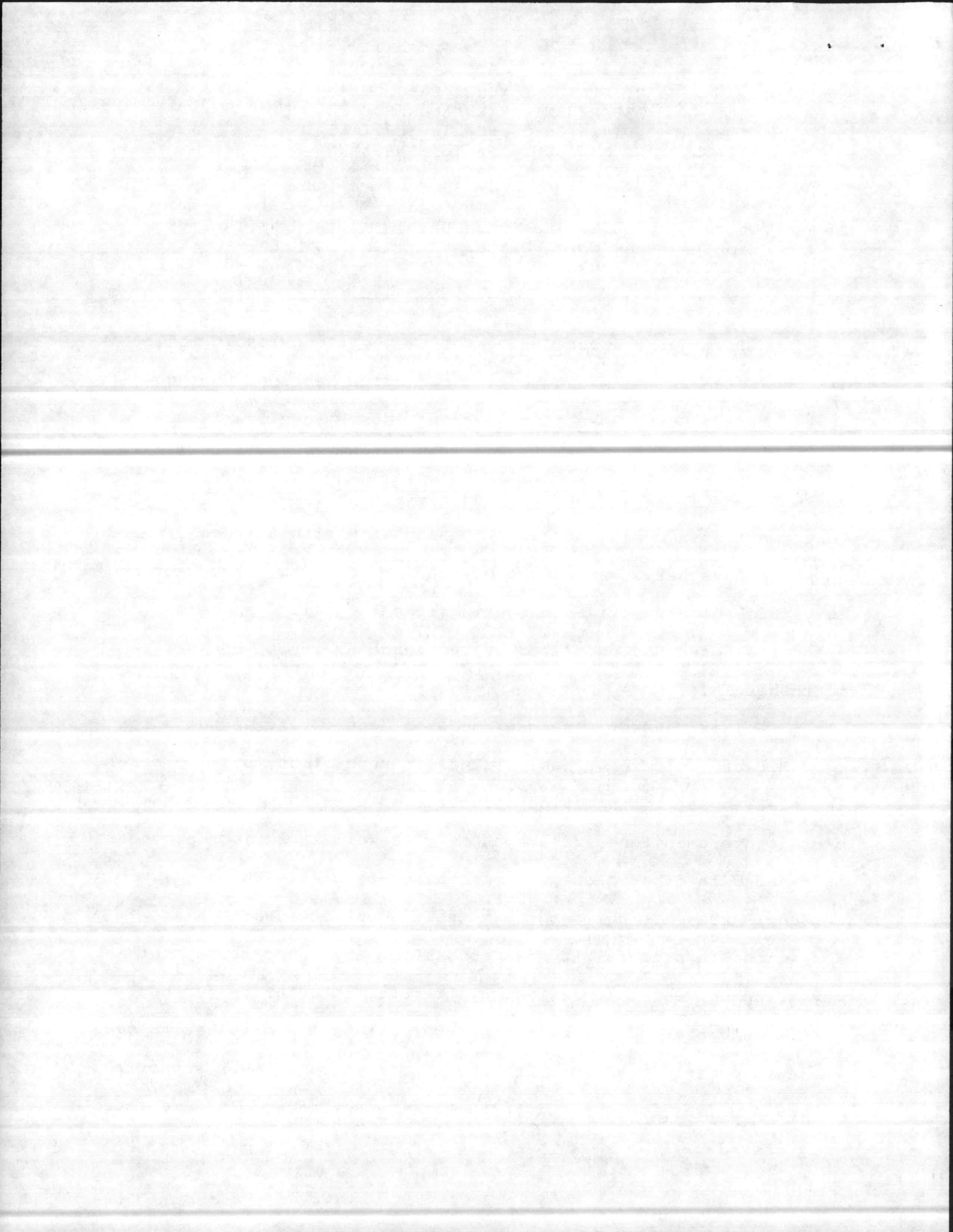
... (2)

STATE OF NORTH CAROLINA
DEPARTMENT OF HUMAN RESOURCES
DIVISION OF HEALTH SERVICES
SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH

In Re: United States Marine Corps Base) ADMINISTRATIVE
Camp Lejeune, North Carolina) CONSENT AGREEMENT
ID NO. NC 6170022580) DOCKET NO. _____

In order to provide for the expeditious resolution of discrepancies in the management of Hazardous Waste by United States Marine Corps Base, Camp Lejeune, North Carolina (USMCB) as delineated in the RCRA SITE INSPECTION REPORT (Inspection Report) dated August 4, 1986 USMCB and the State of North Carolina, Department of Human Resources, Division of Health Services, Solid and Hazardous Waste Management Branch (Branch), do hereby enter into this administrative consent agreement. Said Inspection Report is hereby incorporated by reference as if it were set forth herein.

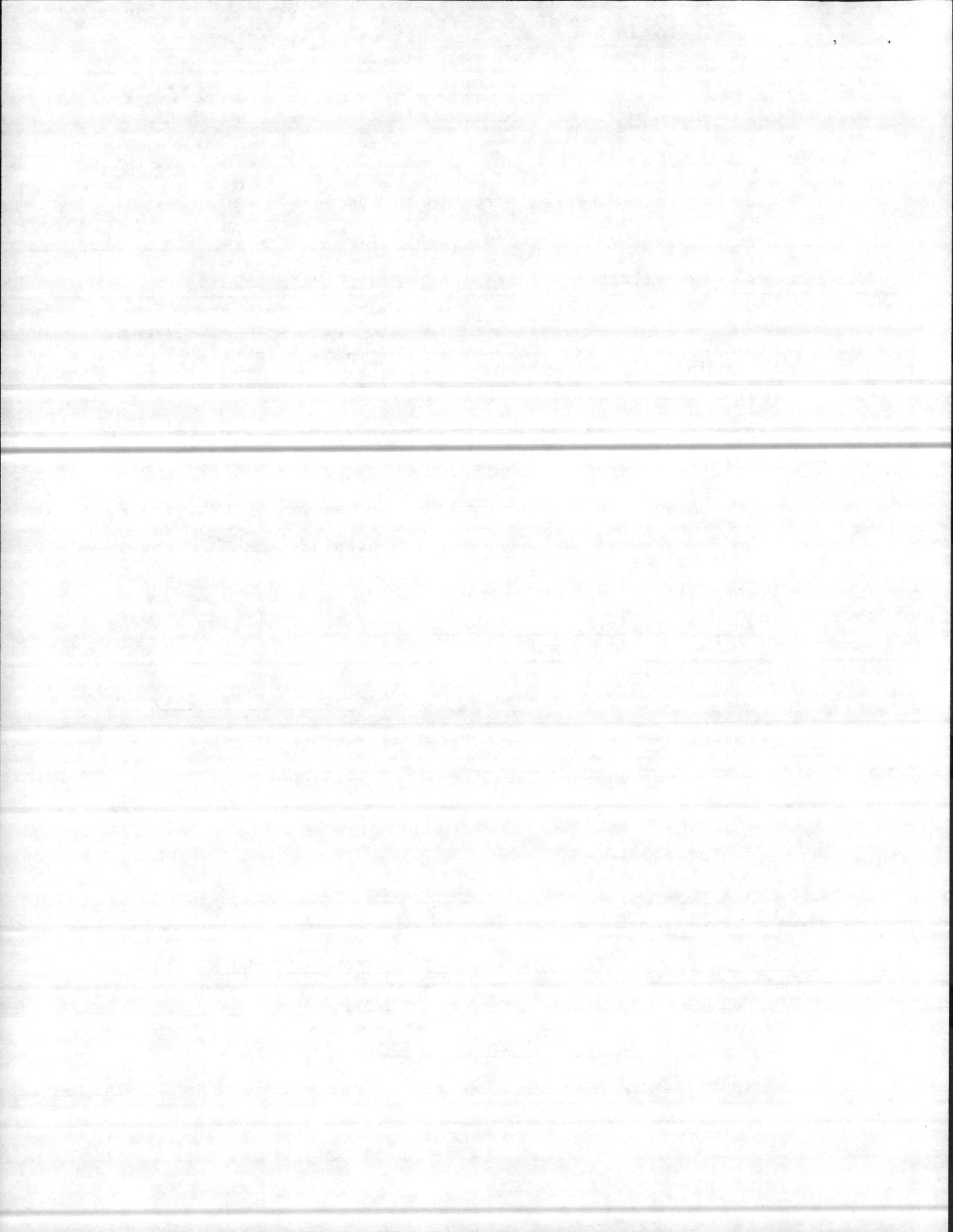
This Consent Agreement does not constitute an admission by USMCB of violation of any statute or regulation; but is rather intended to set forth action already completed in response to certain aforementioned discrepancies, as well as action in process to respond to other aforementioned discrepancies. While this Consent Agreement includes the establishment of schedules for action in process, it does not affect any other issue that may arise between the parties. Therefore, in order to further the public interest and to insure the protection of public health and the environment, USMCB and Branch, by and through their authorized representatives, do enter into the following Consent Agreement and they provide:



ACTION COMPLETED

1. Action has been taken with regard to the following discrepancies and they have been corrected:

- a. 40 CFR 262.21 - Manifest (Required Information) at page 3 of the Inspection Report.
- b. 40 CFR 262.34(a)(1) - Subpart I at page 3 of the Inspection Report. Weekly inspections are being performed at building 909 and inspections of drums of electrolyte solution stored near building 909 have been and are being conducted.
- c. 40 CFR 262.34(a)(2) Accumulation Date at page 3 of the Inspection Report.
- d. 40 CFR 262.34(2)(3) - Labeling Containers at page 3 of the Inspection Report.
- e. 40 CFR 265.31 - Maintenance and Operation of Facility at page 4 of the Inspection Report. The batteries have been turned upright and the discolored soil tested to determine if any hazardous waste has been released. Test results are pending.
- f. 40 CFR 262.42(a) and (b) Exemption Reporting at page 4 of the Inspection Report. Copies of these manifests identified as missing have been obtained. The manifests are properly signed.
- g. Permit Condition - Container Storage at page 4 of the Inspection Report. No containers of hazardous waste are stacked higher than two drums.



2. USMCB agrees to take the following action to prevent the reoccurrence of the discrepancies delineated in paragraph 1 above:

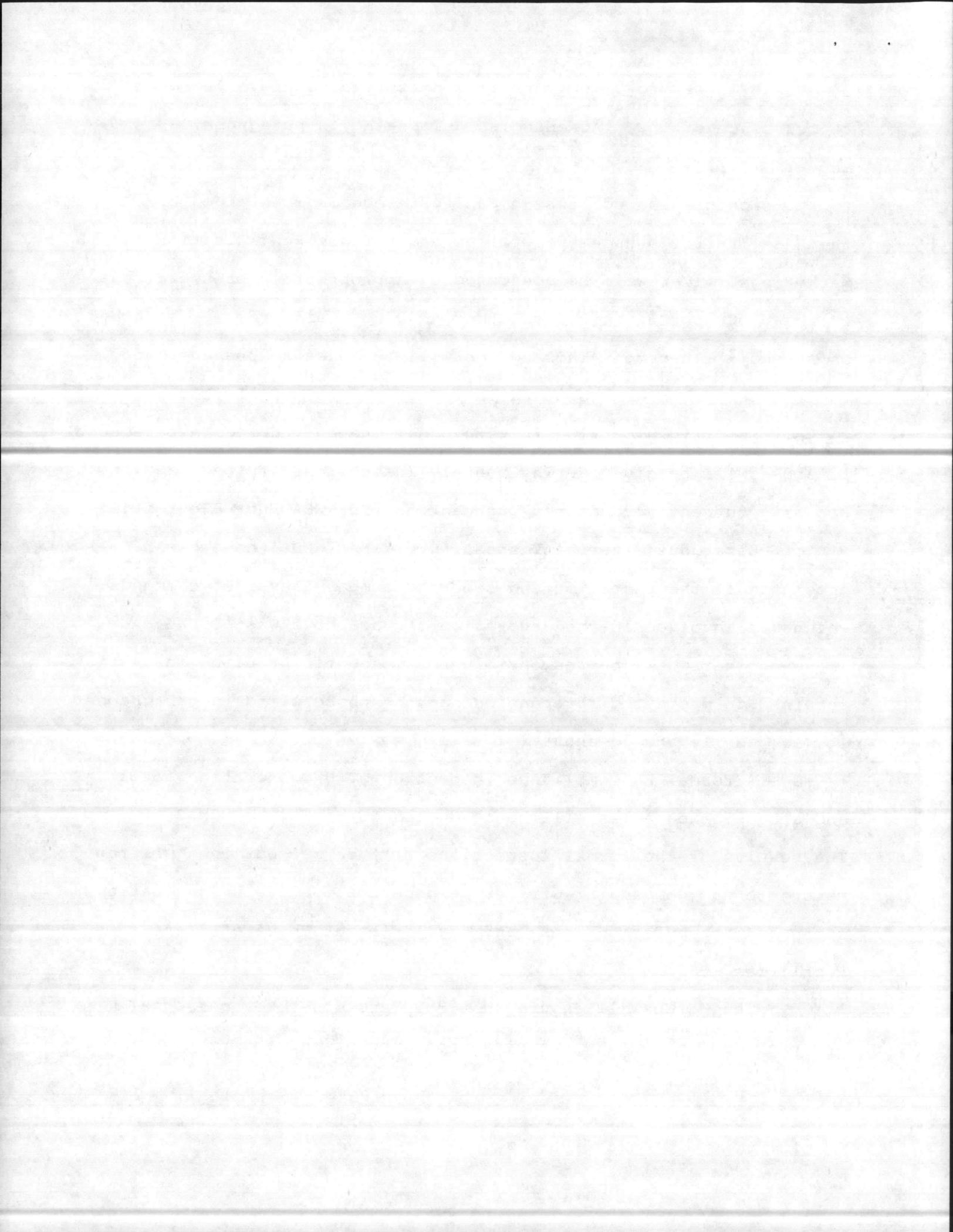
a. Monthly inspections of Manifest records maintained by the Base Traffic Management Officer and Defense Reutilization and Marketing Officer will be conducted by appropriate representatives of the USMCB pursuant to Base Order 6240.5. Said Order is attached as Appendix I hereto. This action will be taken to prevent the recurrence of violations noted in paragraphs 1a and 1f above.

b. Specific attention to type of discrepancy noted in paragraph 1f above will be given during monthly Inspections of the USMCB Storage Facility currently conducted pursuant to the RCRA Part B permit.

c. Hazardous Material Disposal Officers (HMDO) have been appointed at the battalion and separate company level of commands which are involved in the generation of hazardous waste (HW). These officers will be responsible for conducting routine inspections required to prevent discrepancies such as those cited in paragraphs 1b, 1c, 1d, 1e and 1g above.

d. A formal HW compliance inspection of HW generation sites and accumulation areas will be conducted quarterly by USMCB. The results of the formal inspections will be set out in a written report to the Commanding Officer responsible for the HW generation sites and accumulation areas and the Assistant Chief of Staff, Facilities, USMCB.

e. The USMCB will ensure that HMDO and other key personnel are provided initial HW training upon appointment and refresher training thereafter as required.



ACTION IN PROGRESS

3. USMCB agrees to take action with regard to the remaining discrepancies as follows:

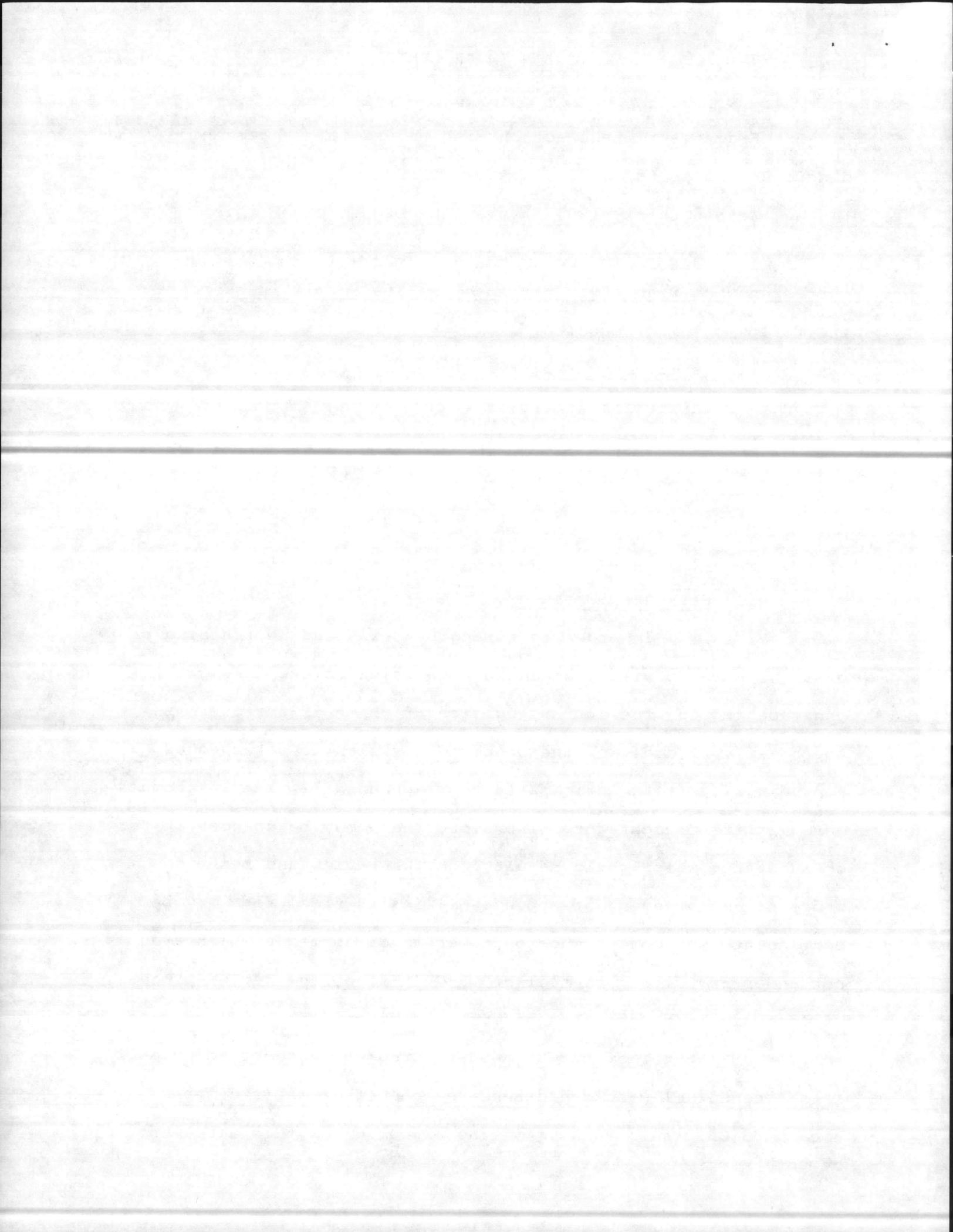
a. Within thirty (30) days of the execution of this agreement by both parties, USMCB agrees to submit appropriate correspondence with a view to amending its permit in response to the following discrepancies:

- (1) Permit Condition - Inspection Log at page 4 of the Inspection Report.
- (2) Permit Condition - Modification at page 5 of the Inspection Report.

b. Within ninety (90) days of the execution of this agreement by both parties, USMCB agrees to take action as follows:

- (1) Personnel Training.

(a) In order to strengthen existing HW training programs, the USMCB will promulgate a revision to the Base HW Management Order the current edition of which is attached as Appendix I. A draft of the proposed revision is attached as Appendix II. It is anticipated that Appendix II will be promulgated in its present form. However, there may be changes in form or substance which would result from the review and staffing process. Enforcement of Appendix II in its final form may be contingent upon concurrence by other major commands which are not under the direct control of USMCB. Also, the review process of Appendix II by other major commands aboard USMCB is not under the direct control of USMCB. USMCB agrees to attempt to promulgate Appendix II with concurrence of the other major commands aboard USMCB within 90 days of the execution of this agreement by both parties.



(b) USMCB will develop a listing of authorized HW generation and accumulation sites. Initial HW orientation training will be scheduled for personnel, to include back-up personnel, at the identified sites pursuant to Appendix II.

(c) Other matters regarding training have been addressed in paragraph 2e above.

(d) The matters addressed in this paragraph are in response to the following discrepancies:

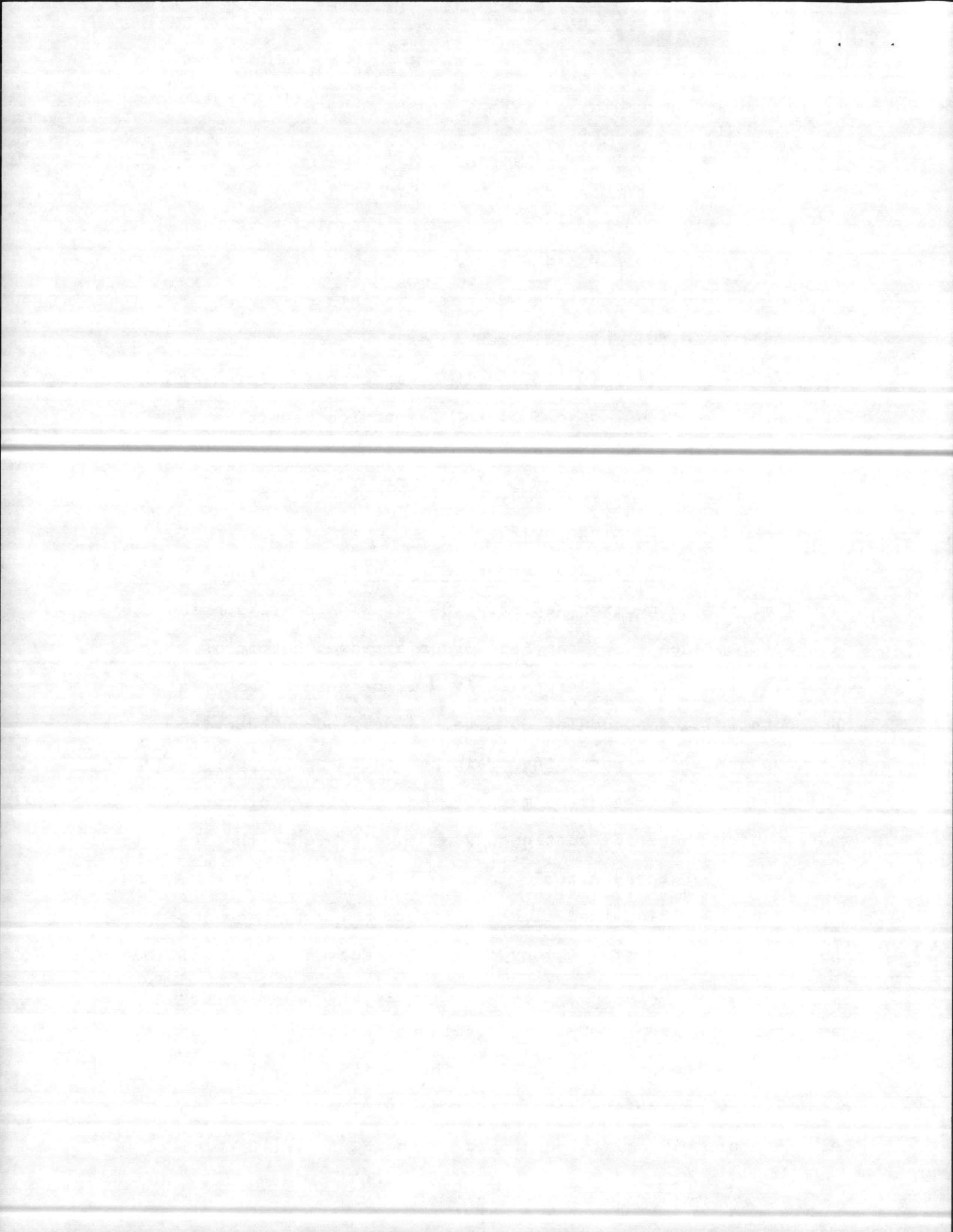
(1) 40 CFR 265.16 - Personnel Training at page 3 of the Inspection Report.

(2) 40 CFR 264.16 - Personnel Training at page 4 of the Inspection Report.

(2) Spill Contingency Plan.

(a) 40 CFR 265 Subpart D - Contingency Plan at page 4 of the Inspection Report. The basewide spill contingency plan was implemented by the Base Order attached hereto as Appendix IV. Copies of Appendix IV will be maintained at all HW generation and accumulation sites identified pursuant to paragraph 3b(1)(b) above. HW training identified in paragraph 3b(1)(b) above will address methods and techniques of implementation of the spill contingency plan relative to the specific requirements of those sites.

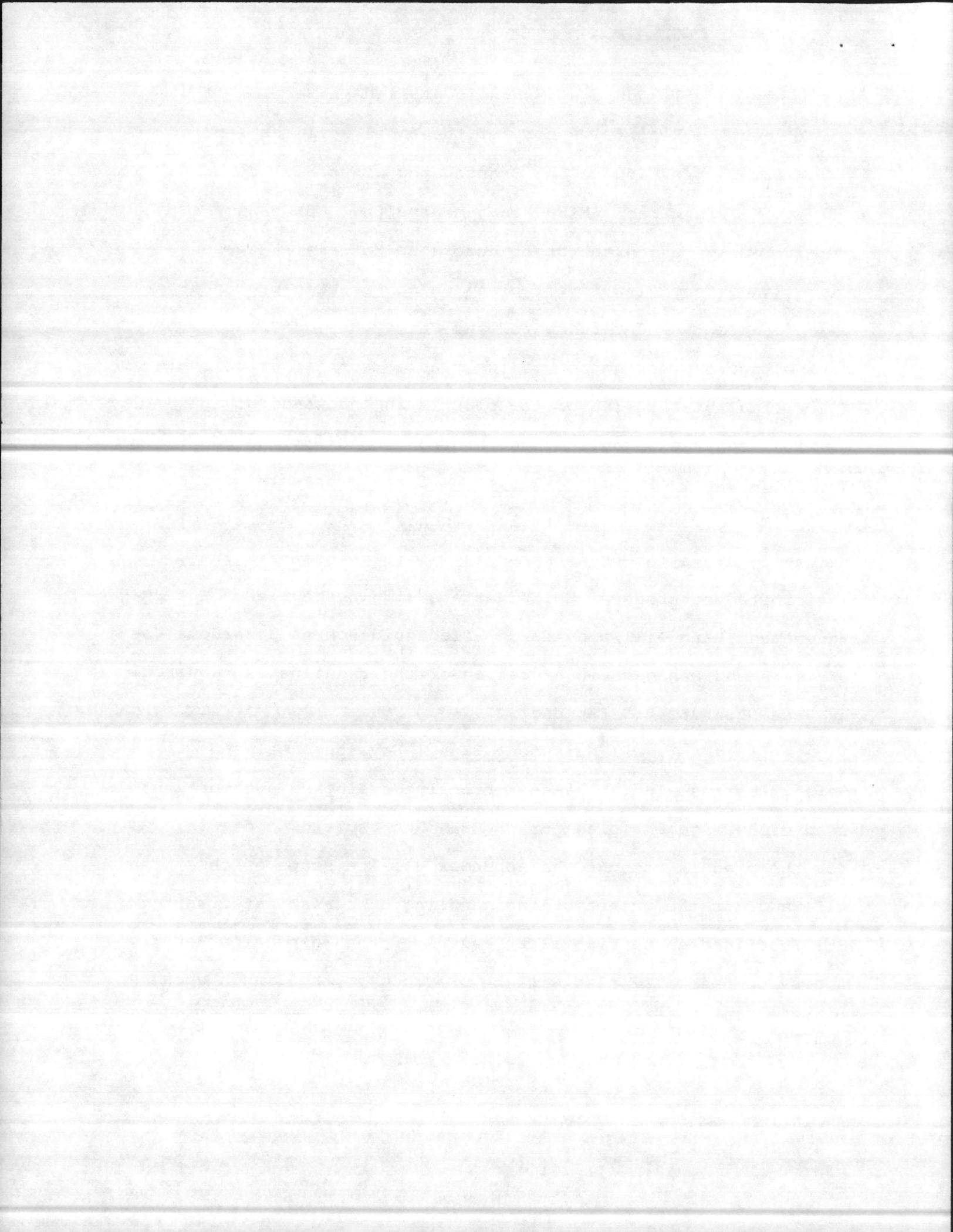
(b) Recommendations in (Section 11) at page 5 of the Inspection Report. A copy of the Inspection Report will be provided to the civilian contractor who is preparing the HW Management Plan for USMCB. The Table of Contents of the draft plan is attached as Appendix III. The contractor will be requested to revise the spill contingency plan for the Long Term HW Storage Facility described in the RCRA Part B permit.



The revision will address issues identified in Section 11 of the Inspection Report. A copy of the final spill contingency plan will be provided to the Branch upon its promulgation.

(c) Draft HM/HW Management Plan. USMCB agrees to expeditiously review the draft Hazardous Material/Hazardous Waste Management Plan (draft plan) which has been prepared under contract by Environmental and Safety Designs, Inc. with a view toward promulgation of the plan as soon as practicable. Since final preparation of the plan is in the hands of a civilian contractor outside the control of USMCB, the USMCB cannot guarantee final promulgation of the plan within ninety days. The cover page and table of contents of the draft plan, volume 2, are attached as Appendix III to demonstrate the anticipated coverage of HM/HW matters within the plan. The HM/HW Management Plan will provide detailed guidance to Hazardous Waste Officers and Managers in execution of their duties as required by Base Order 6240.5 (Appendix I).

(3) Waste Oil Mangement Plan. Environmental and Safety Designs, Inc. is also currently developing a comprehensive used oil management plan for USMCB. The table of contents for the plan is attached as Appendix V. The scope of this plan will address the matter of the handling of contaminated waste oil described in Section 11 at page 5 of the Inspection Report. A copy of the final plan will be provided to the Branch upon promulgation.



OTHER TERMS AND CONDITIONS

4. USMCB will submit monthly written status reports which will briefly summarize all action in progress which is completed during the month covered by said report. The first status report will be submitted within thirty-five (35) days following the execution of this agreement by both parties. The report will be prepared by the Director, Natural Resources and Environmental Affairs Division, USMCB, Mr. Julian I. Wooten at (919) 451-2083.

5. The Branch will perform necessary oversight and review activities which may include inspections of USMCB facilities and records upon reasonable notice to Mr. Julian Wooten at (919) 451-2083.

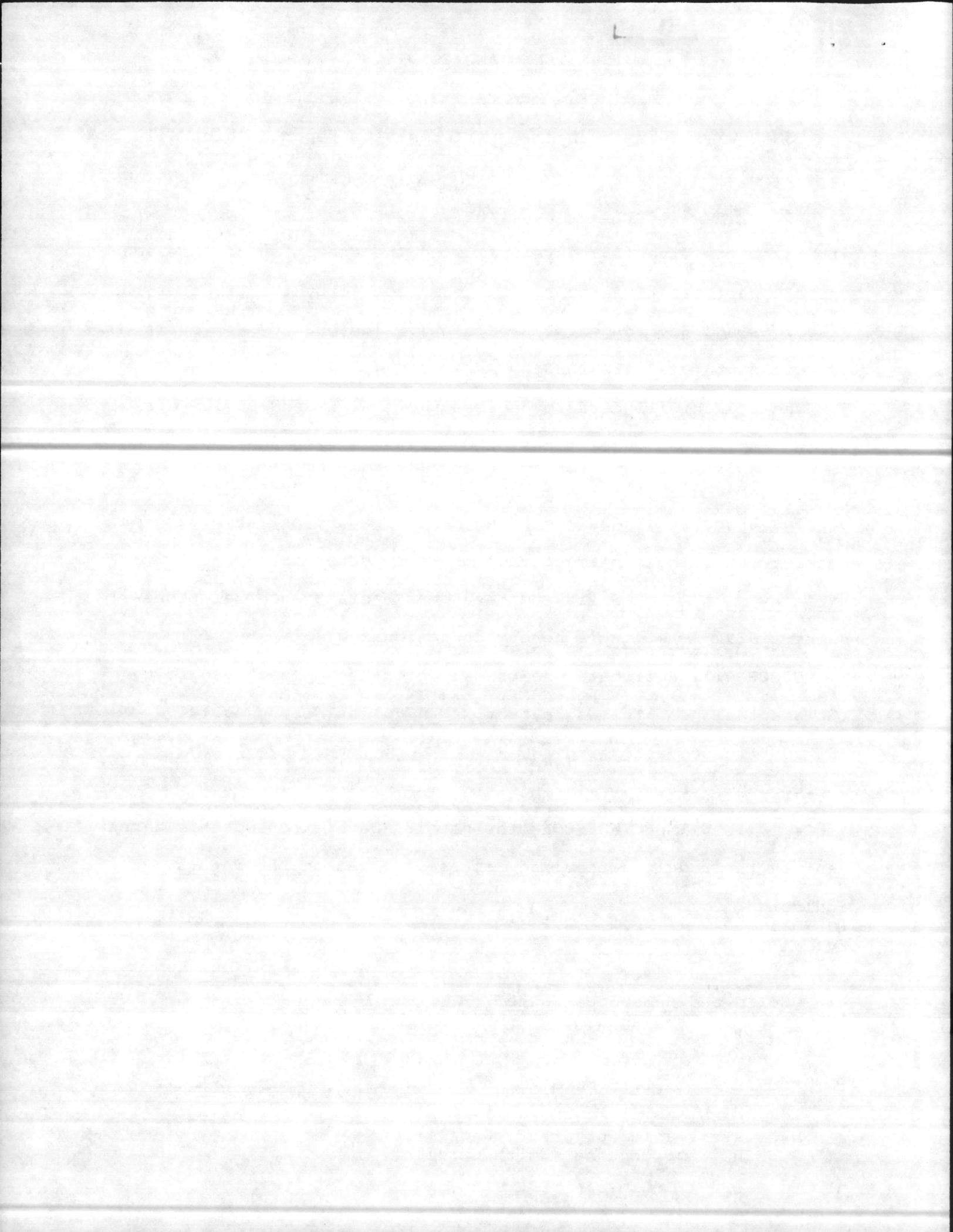
6. The Branch will designate one person as the primary point of contact regarding implementation of this agreement. _____
_____, Solid and Hazardous Waste Branch, at phone number (919) ____-____ is hereby so designated.

7. USMCB will designate one primary point of contact regarding implementation of this agreement. Mr. Julian Wooten at (919) 451-2083 is so designated.

IN WITNESS WHEREOF, the parties have executed this agreement by their duly authorized representatives on the date(s) indicated.

By: _____
Solid and Hazardous Waste Management Branch
date

By: _____
Colonel T. J. Dalzell
Assistant Chief of Staff, Facilities
USMCB, Camp Lejeune, North Carolina
date



Attachments:

Appendix I: USMCB Order 6240.5 (Hazardous Material Disposal Program)

Appendix II: Proposed Revision to MCB Order 6240.5

Appendix III: Cover page and Table of Contents to Draft Hazardous Material/Hazardous Waste Management Plan, Marine Corps Base, Camp Lejeune, North Carolina, v2.

Appendix IV: USMCB Order 11090.1B (Oil Pollution Prevention and Abatement and Oil other Hazardous Substances Spill Contingency Plan)

Appendix V: Cover page and Table of Contents to Draft Used Oil Management Plan, Marine Corps Base, Camp Lejeune, North Carolina

