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Thank
Tide Waste Water*



WE ARE HAVE
RECEIVED OUR
CERTIFICATION
FOR WASTEWATER
(NPDES) ANALYSIS

North Carolina
Resources and Community Development
Environmental Management

• Raleigh, North Carolina 27611
October 22, 1987

R. Paul Wilms
Director

James
S. The

Ms. Elizabeth A. Betz
NREAD, EC & M Lab
Assistant Chief of Staff, Facilities
Camp Lejeune, NC 28542

Dear Ms. Betz:

Re: Initial Wastewater Laboratory Certification

The Department of Natural Resources & Community Development, in accordance with the provisions of N.C. GS 143-215.3(a)(10), 15 NCAC 2H .0800, is pleased to certify your laboratory to perform specified water analysis required by EMC monitoring and reporting regulations 15 NCAC 2B .0500 and 2H .0900.

A certificate acknowledging the certification of your laboratory is enclosed for your use. The certificate describes the requirements and limits of your certification. Please review this certificate to insure that your laboratory is certified for all parameters required to properly meet your certification needs.

Contact us at 919-733-3908 if you have questions or need additional information.

Sincerely,

B. E. Sims, PhD
Chief, Laboratory Section

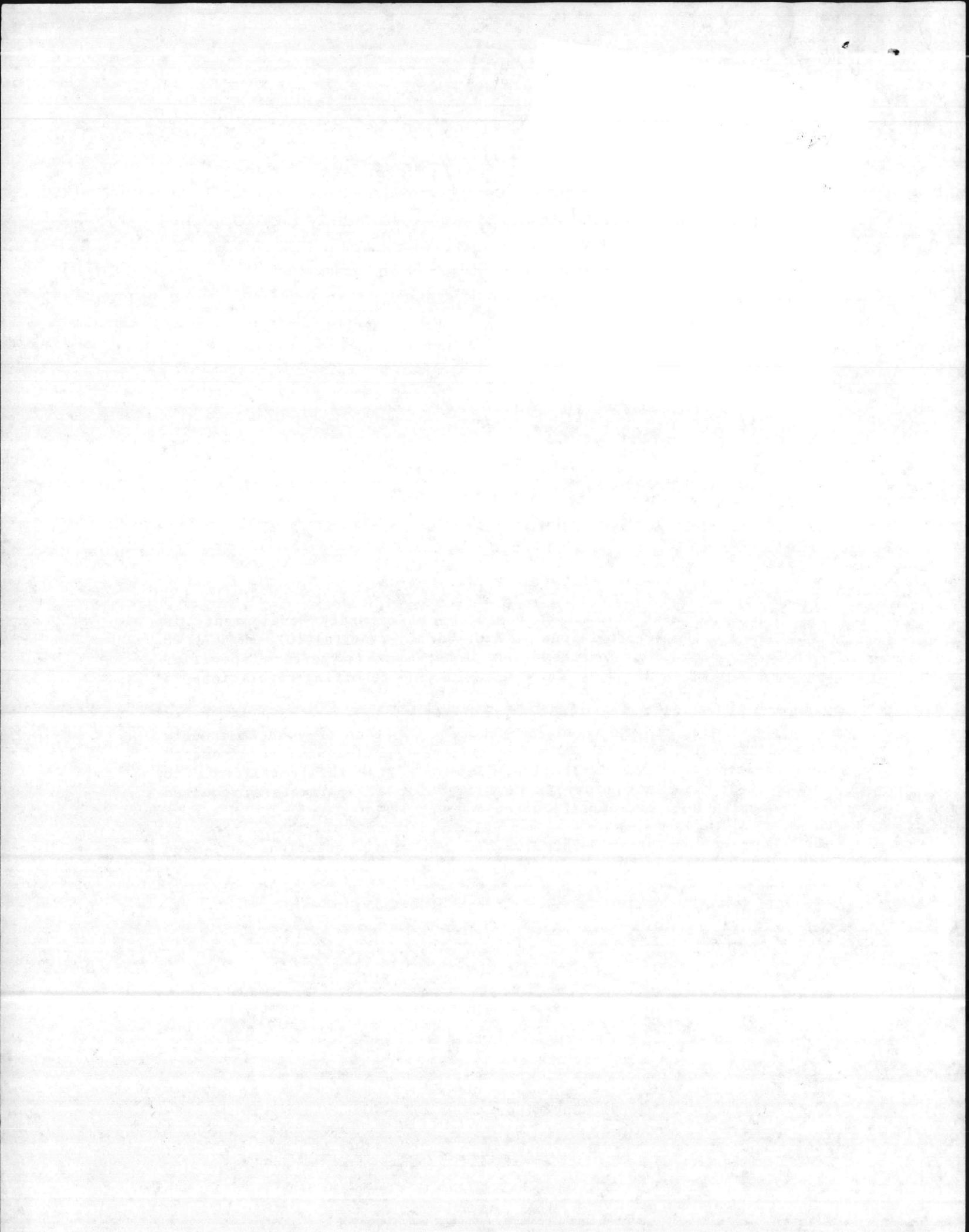
Enclosure

cc: Mr. Billy Byrd
Wilmington Regional Supervisor

Pollution Prevention Pays

P.O. Box 27687, Raleigh, North Carolina 27611-7687 Telephone 919-733-7015

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*9 calls
Thank
Title Waste water*



State of North Carolina
Department of Natural Resources and Community Development
Division of Environmental Management
512 North Salisbury Street • Raleigh, North Carolina 27611

James G. Martin, Governor
S. Thomas Rhodes, Secretary

September 22, 1987

R. Paul Wilms
Director

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Assistant Chief of Staff, Facilities
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ME

STATE OF NORTH CAROLINA DEPARTMENT OF
NATURAL RESOURCES & COMMUNITY DEVELOPMENT

Division of Environmental Management
Laboratory Certification Program

In accordance with the provisions of N.C.G.S. 143-215.3 (a) (1), 143-215.3 (a) (10) and NCAC 2H .0800:



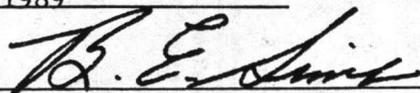
CAMP LEJEUNE ENVIRONMENTAL CHEMISTRY & MICROBIOLOGY LAB

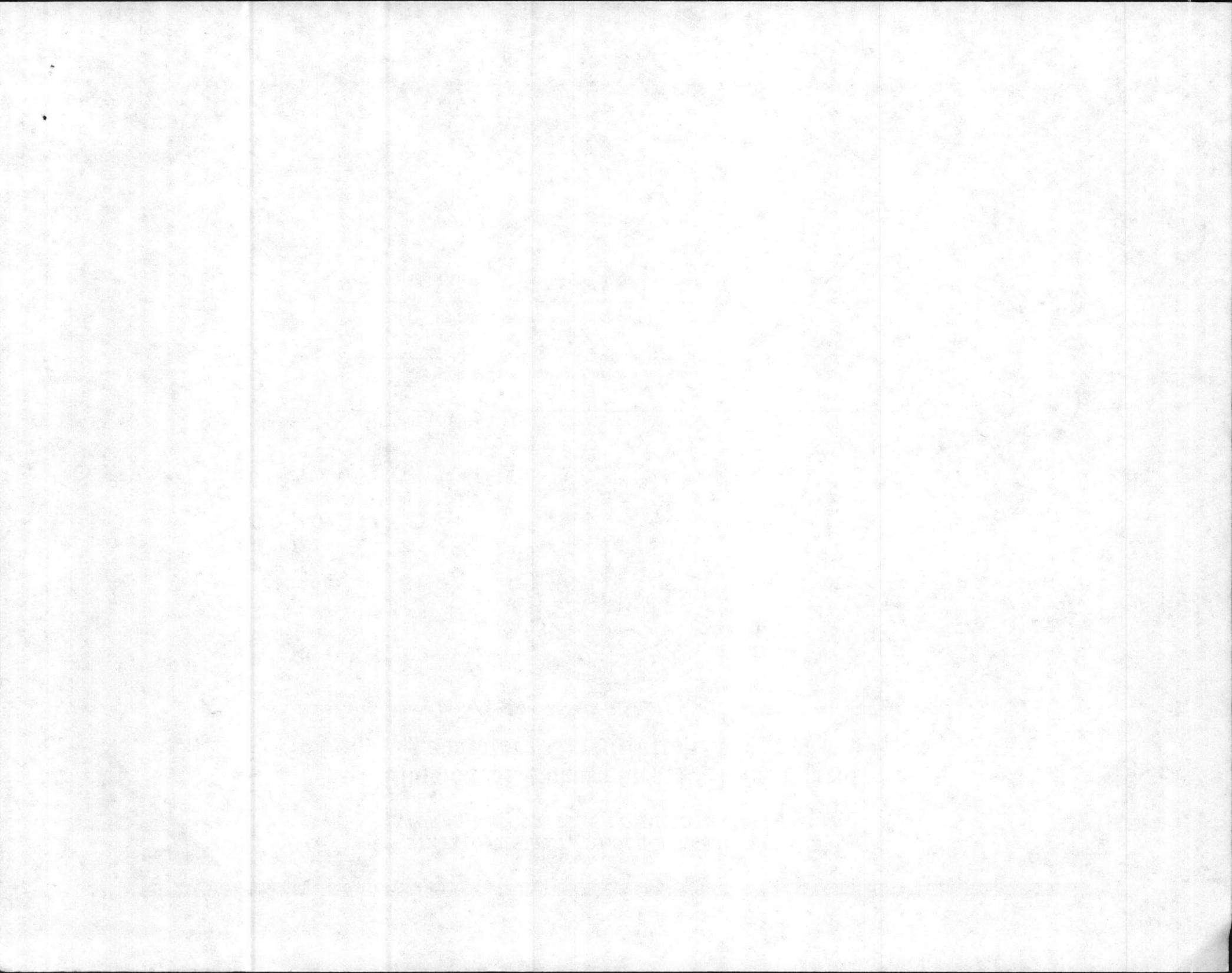
Is hereby certified to perform wastewater analyses (as listed on attachment I) and report monitoring data to DEM for compliance with monitoring and pretreatment regulations.

This certificate does not guarantee validity of data generated, but indicates the methodology, equipment, quality control procedures, records, and proficiency of the laboratory have been examined and found to be acceptable.

This certificate shall be valid until December 31, 1989

Certificate No. 227


B. E. Sims, PhD
Chief, Laboratory Section



**ATTACHMENT I
PARAMETER CERTIFICATION**

The Camp Lejeune Environ. Chemistry & Microbiology laboratory has been evaluated and found acceptable for the measurement of the parameters listed below that are preceded by an (X).

<input checked="" type="checkbox"/> BOD	Metals, Group I	<input type="checkbox"/> Arsenic
<input type="checkbox"/> COD	<input type="checkbox"/> aluminum	<input type="checkbox"/> Barium
<input type="checkbox"/> Chloride	<input type="checkbox"/> beryllium	<input type="checkbox"/> Mercury
<input checked="" type="checkbox"/> Coliform, fecal MF	<input type="checkbox"/> cadmium	<input type="checkbox"/> Selenium
<input checked="" type="checkbox"/> Coliform, total MF	<input type="checkbox"/> chromium, total	<input checked="" type="checkbox"/> Ammonia nitrogen
<input checked="" type="checkbox"/> Coliform, fecal tube	<input type="checkbox"/> cobalt	<input type="checkbox"/> Total Kjeldahl nitrogen
<input checked="" type="checkbox"/> Coliform, total tube	<input type="checkbox"/> copper	<input type="checkbox"/> Nitrate + nitrite nitrogen
<input type="checkbox"/> Cyanide	<input type="checkbox"/> iron	<input checked="" type="checkbox"/> Total phosphorus
<input type="checkbox"/> Fluoride	<input type="checkbox"/> lead	<input type="checkbox"/> Orthophosphate
<input checked="" type="checkbox"/> Grease and oil	<input type="checkbox"/> manganese	<input checked="" type="checkbox"/> pH
<input type="checkbox"/> Hardness, total	<input type="checkbox"/> nickel	<input type="checkbox"/> Phenols
<input type="checkbox"/> MBAS	<input type="checkbox"/> zinc	<input type="checkbox"/> Residue, total
	Metals, Group II	<input checked="" type="checkbox"/> Residue, total suspended
	<input type="checkbox"/> antimony	<input type="checkbox"/> Turbidity
	<input type="checkbox"/> silver	
	<input type="checkbox"/> thallium	

This certification requires maintenance of an acceptable quality assurance program, use of approved methodology and equipment, and satisfactory performance on evaluation samples.

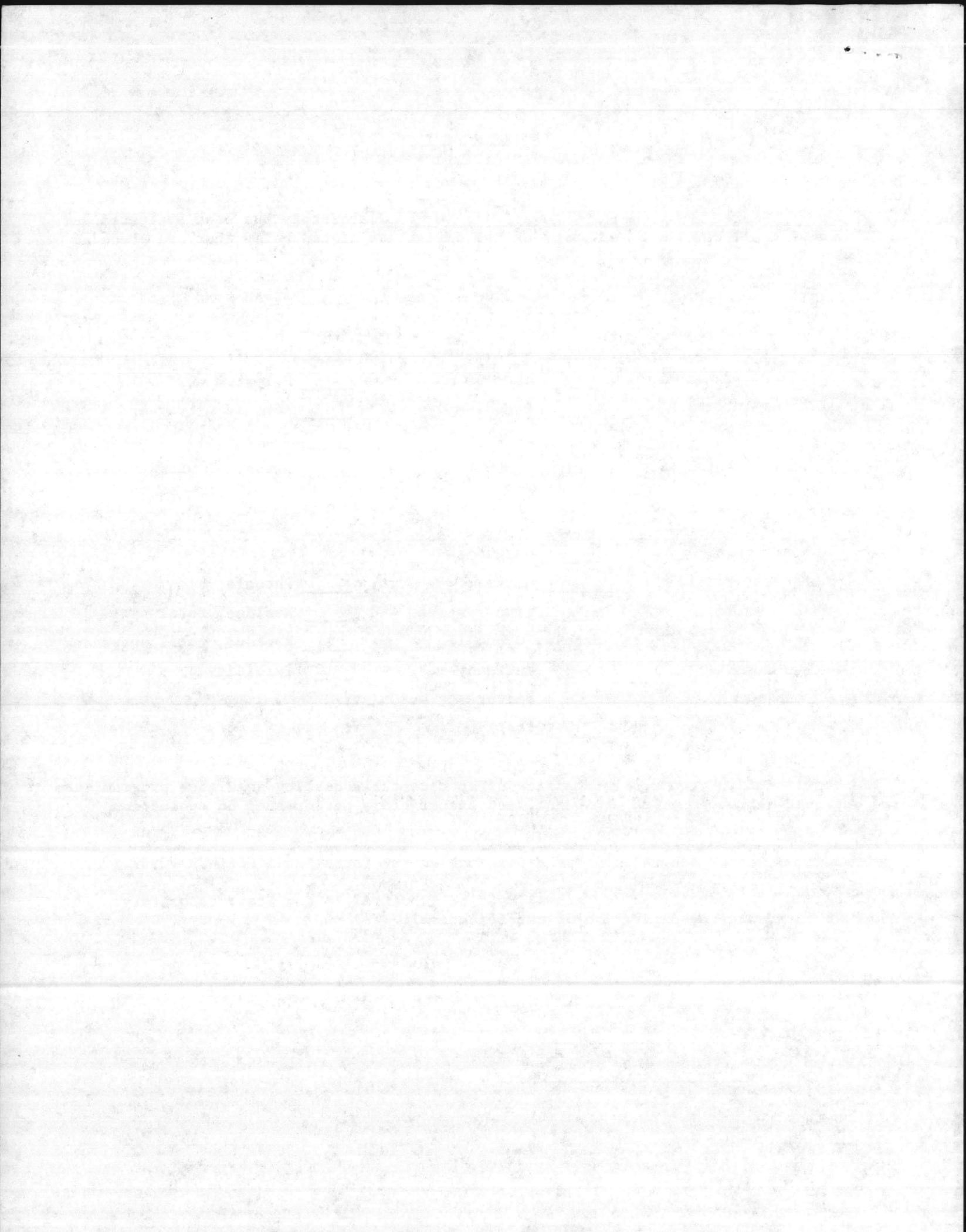
Laboratories may be decertified for violations as set forth in 15 NCAC 2H .0807.

Applications for certification renewal must be submitted to the State Laboratory 30 days in advance of expiration of certification.

Certificate No. 227

Effective Date September 21, 1987

Expiration Date December 31, 1989





NR READ

DEPARTMENT OF THE NAVY

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

C. J. DeBell: 4

BVC

TELEPHONE NO.
(804) 445-2935

IN REPLY REFER TO:

5090
1142SGO

1 SEP 1987

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

Subj: RCRA IMPACTS ON EXISTING DOD WASTEWATER TREATMENT FACILITIES

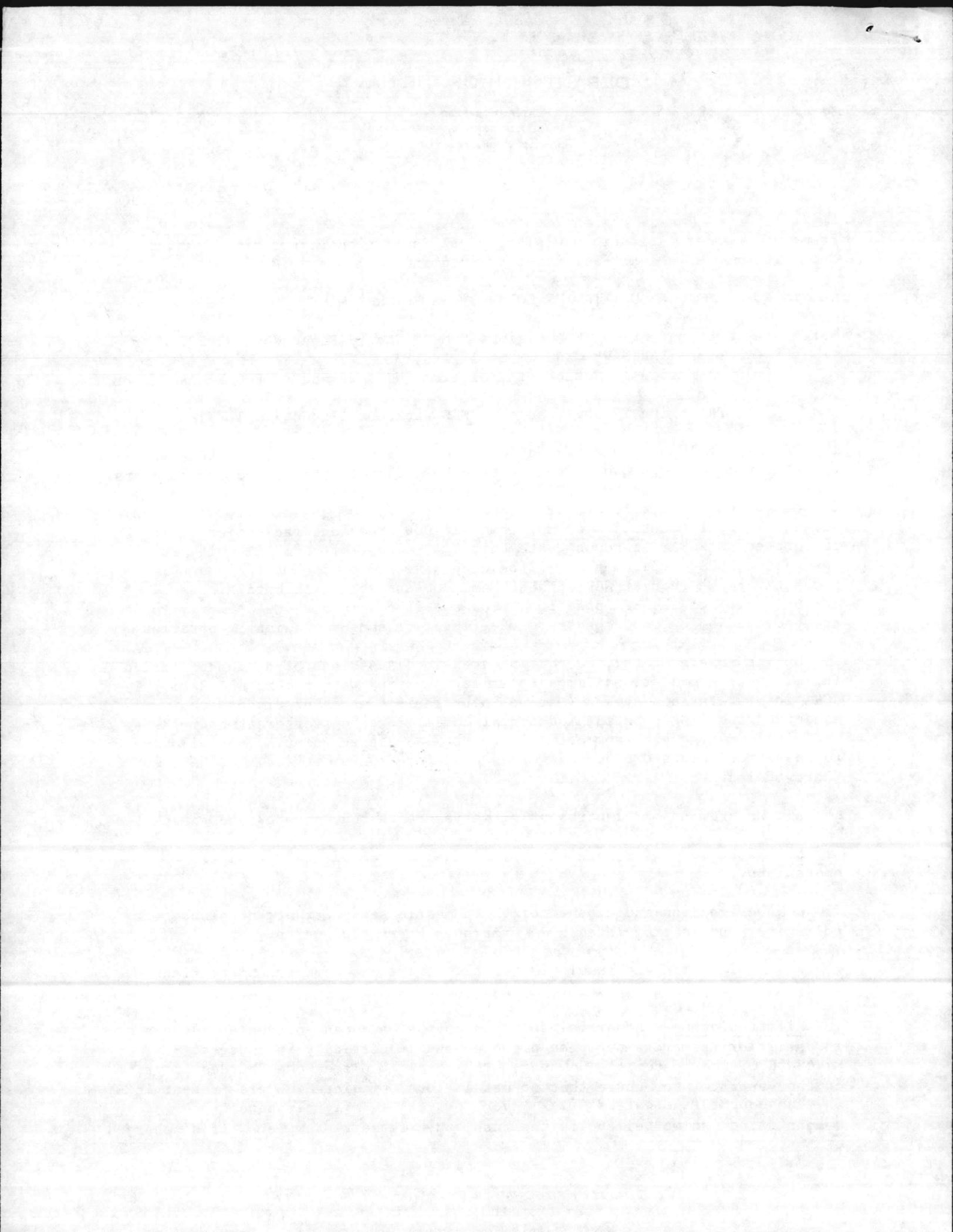
Ref: (a) Meeting between EPA Region IV/MCAS Cherry Point/NAVAVNDEPOT Cherry Point/ LANTNAVFACENCOM of 12 Aug 87
(b) EPA Region IV Notice of Violation (NOV) Issued to PWC Pensacola on 1 May 87
(c) EPA Region IV NOV Issued to NAS Jacksonville on 7 Jul 87

1. EPA Region IV has interpreted RCRA such that allowing any hazardous wastes to enter non Publicly Owned Treatment Works (POTW) treatment facilities makes those facilities regulated RCRA Hazardous Waste Units. Therefore, since all DOD treatment facilities are defined as non-POTWs and practically all contain at least minute quantities of HW, then all DOD treatment facilities could be designated as RCRA Hazardous Waste Units. The cost of complying with the associated RCRA requirements will be excessive and environmentally non productive. We request NAVFACENCOM and DOD assistance in obtaining a re-evaluation of the EPA position. The specific issues at MCAS Cherry Point are provided below to demonstrate the impact of the EPA Region IV position.

2. During reference (a), we participated in discussions of a plan of action for minimizing operational impacts while complying with recent EPA Region IV RCRA interpretations at Navy/Marine Corps facilities. Our discussions concerned the impact on the industrial/domestic wastewater treatment plants and sludge management from both plants at MCAS Cherry Point. The following topics were discussed concerning present/future operations at MCAS/NAVAVNDEPOT Cherry Point.

- a. Management of electroplating wastes, both concentrates and rinsewaters.
- b. Waste solvent management, particularly from aircraft stripping operations.
- c. Designation and closure of the domestic sewage treatment plant polishing ponds as regulated RCRA Hazardous Waste (HW) units.
- d. Designation and regulation of all domestic sewage treatment plant sludges, both past and present, as hazardous wastes.

Electroplating - A partial solution to the management of concentrates and industrial rinsewaters has been proposed and is partially in place at NAVAVNDEPOT Cherry Point. However, EPA Region IV places the "burden of proof" on the generator to ensure that no metal "ions" of listed HW are present in any subsequent rinsewaters (i.e., overflow rinse). If this cannot be demonstrated, as we believe is the case, then these rinsewaters, if discharged



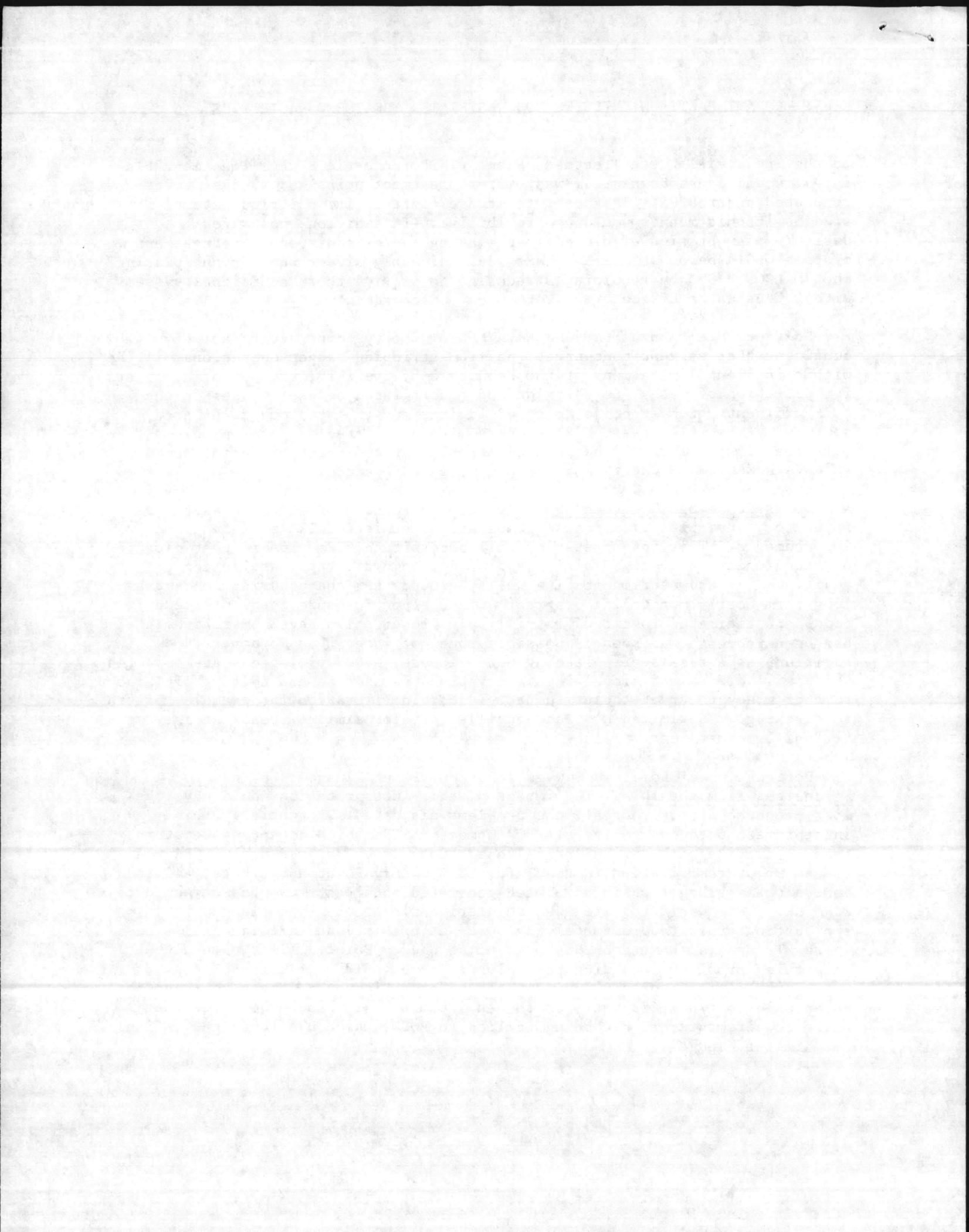
Subj: RCRA IMPACTS ON EXISTING DOD WASTEWATER TREATMENT FACILITIES

to the Industrial Waste Treatment Plant (IWTP)/domestic Sewage Treatment Plant (STP), would cause downstream wastewater treatment units and sludges to be regulated under RCRA. The costs to manage these additional rinsewaters/sludges in this manner would be prohibitive. In addition, costs for design/implementation of closed loop plating and/or additional pretreatment systems would be substantial. This would directly affect the current plating shop MILCON P-913 by requiring a redesign to provide these additional systems with no guarantee of achieving zero "ion" discharge.

Solvents - Although MCAS and NAVAVNDEPOT Cherry Point are relatively confident that solvent concentrations from stripping hanger operations will be within influent limitations at the headworks of the IWTP, the potential exists for detection of methylene chloride and other listed solvent wastes in the IWTP effluent which exceed authorized limitations (25 PPM) due to other sources. This will create RCRA sludges with associated disposal problems for both the STP and IWTP. Other non-electroplating and paint stripping sources at NAVAVNDEPOT/MCAS Cherry Point could also be impacted.

Domestic Sewage Treatment Plant Polishing Ponds - Under the present regulatory interpretation, these ponds are unpermitted RCRA surface impoundments. This interpretation will necessitate RCRA closure/post closure of these units including draining and sludge removal, the installation of additional groundwater monitoring wells, groundwater characterization and a long term costly monitoring program. Closure/post closure costs of these ponds are estimated to exceed \$5 million. Closure plan development/submittal has been requested as soon as possible, but not later than November 1988. In addition, as a result of polishing pond closure, NPDES violations are expected which will create additional regulatory problems and the expenditure of large sums of money to treat the effluent, via carbon filtration for example, prior to discharge. Estimated NAS Jacksonville cost for similar treatment is \$1.9 million per year.

Designation of Domestic Sewage Treatment Plant Sludge as HW due to Discharges from the IWTP. The impact of this interpretation would have the most pronounced effect of all the problems discussed. Potentially this interpretation could require all DOD Domestic STPs which accept wastewaters from activities with any industrial operations to be managed under RCRA. A second major ramification is that, for MCAS Cherry Point and others, all such domestic STP sludges which have been generated both past and present would be RCRA HW. This would require RCRA regulation/closure of land sludge application areas (approximately 35 acres at present) and all landfill sites where STP sludges have been disposed of at Cherry Point. All the resultant permitting problems including post closure care would be required. Costs for regulation of such units DOD-wide would be prohibitive and there would be no acceptable cost/benefit ratio to the environment. It should be noted that these requirements are not being applied to POTWs which use land application for similar sludges.



Subj: RCRA IMPACTS ON EXISTING DOD WASTEWATER TREATMENT FACILITIES

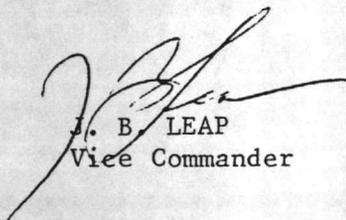
3. The problems addressed above are not unique to MCAS Cherry Point as evidenced by references (b) and (c). We recommend that the Navy/DOD position at a minimum include the following:

a. Legal challenge to the EPA Region IV interpretation especially as it pertains to treatment plant sludges.

b. Insist that all WWTPs be regulated under NPDES, not RCRA, and certainly not both.

c. Should recommendations a, and b. fail then Navy/DOD must be prepared to provide increased support/staffing (Activities and EFDs) to ensure compliance and acceptable resolution of these requirements throughout the Navy/DOD.

4. Your official legal guidance/directive on how to proceed in all of these issues is requested.


J. B. LEAP
Vice Commander

Distribution:

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