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Action Brief

Staff Section: Natural Resources and Environmental Affairs Division

Date:

Problem: Hazardous Waste (HW) compliance issues and pollution abatement needs related to inadequate management of waste petroleum oils and lubricants (POL's).

Background/Discussion:

1. This action brief addresses the Assistant Chief of Staff, Facilities' decision to consolidate the collection and disposal of waste oil under the Director, Natural Resources and Environmental Affairs Division. The decision was discussed with the Supervisory Ecologist during the week ending . The initial scope of the change was limited to the collection of waste oil from generating work sites, storage of oil awaiting disposal, disposal of oil, and related inspections, reports and other administrative tasks required by state and federal environmental regulations. This evaluation addresses the cleaning and maintenance of oil pollution abatement facilities such as oil/water separators, although not within the original AC/S, Facilities scope. Additionally, initial response to the Base Fire Chief requests for equipment and labor to contain and cleanup oil spills is addressed.

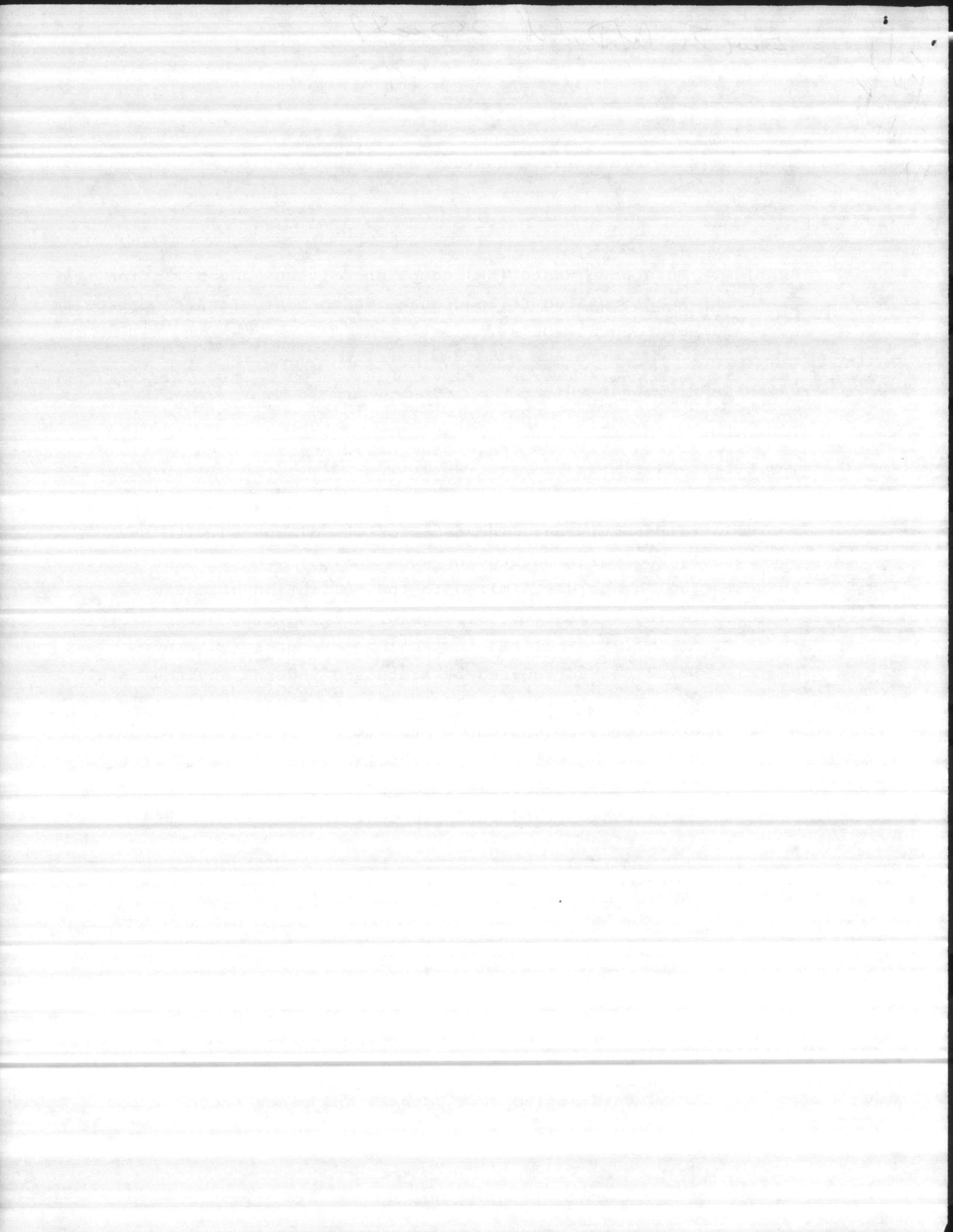
2. Waste POL's generally fall into the following seven categories:

- a. Waste crankcase oil and lubricants
- b. Hydraulic fluids
- c. Water contaminated JP-5, diesel and other fuels

File
Hg Waste

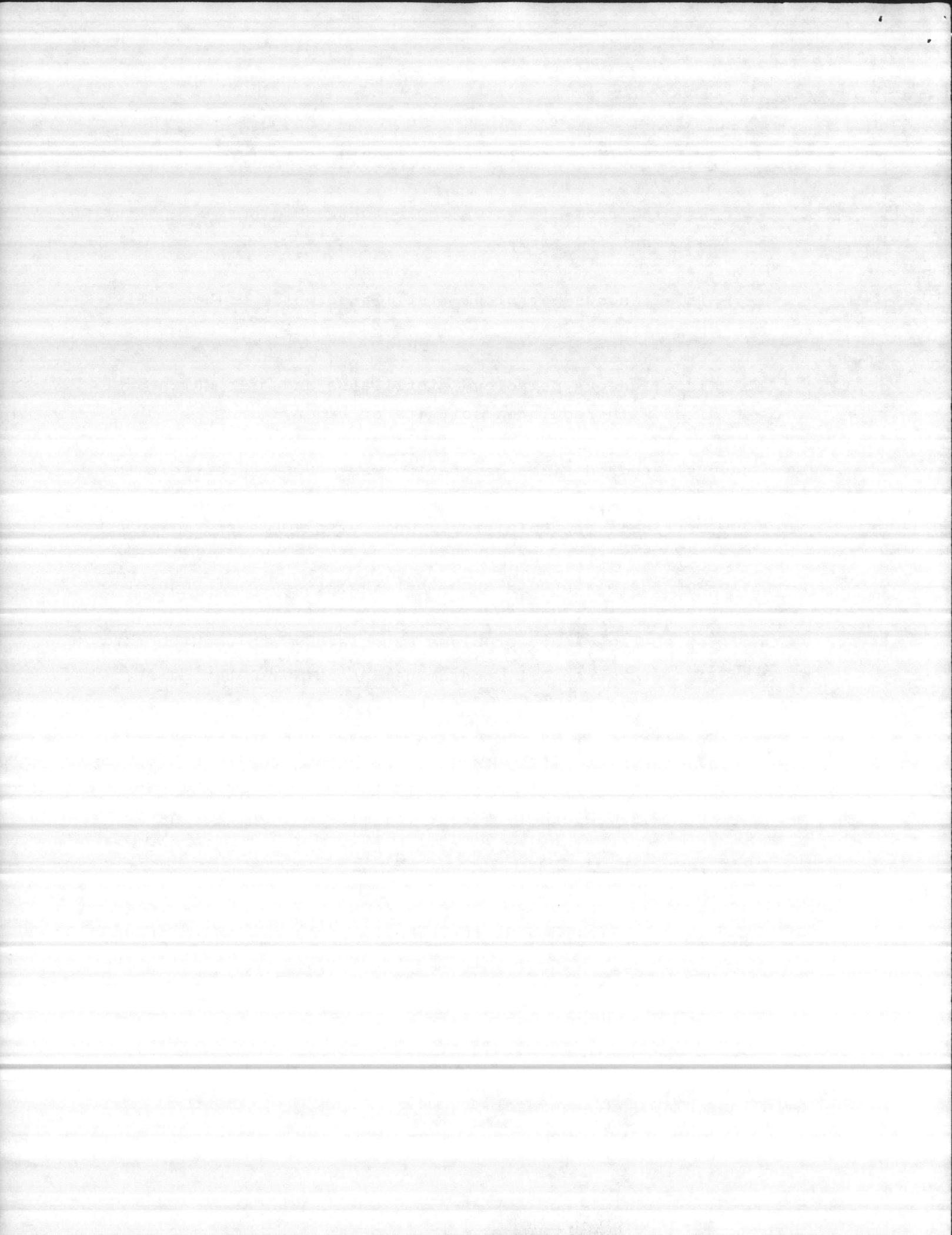
PROOF IN THE COURT

11/11/11



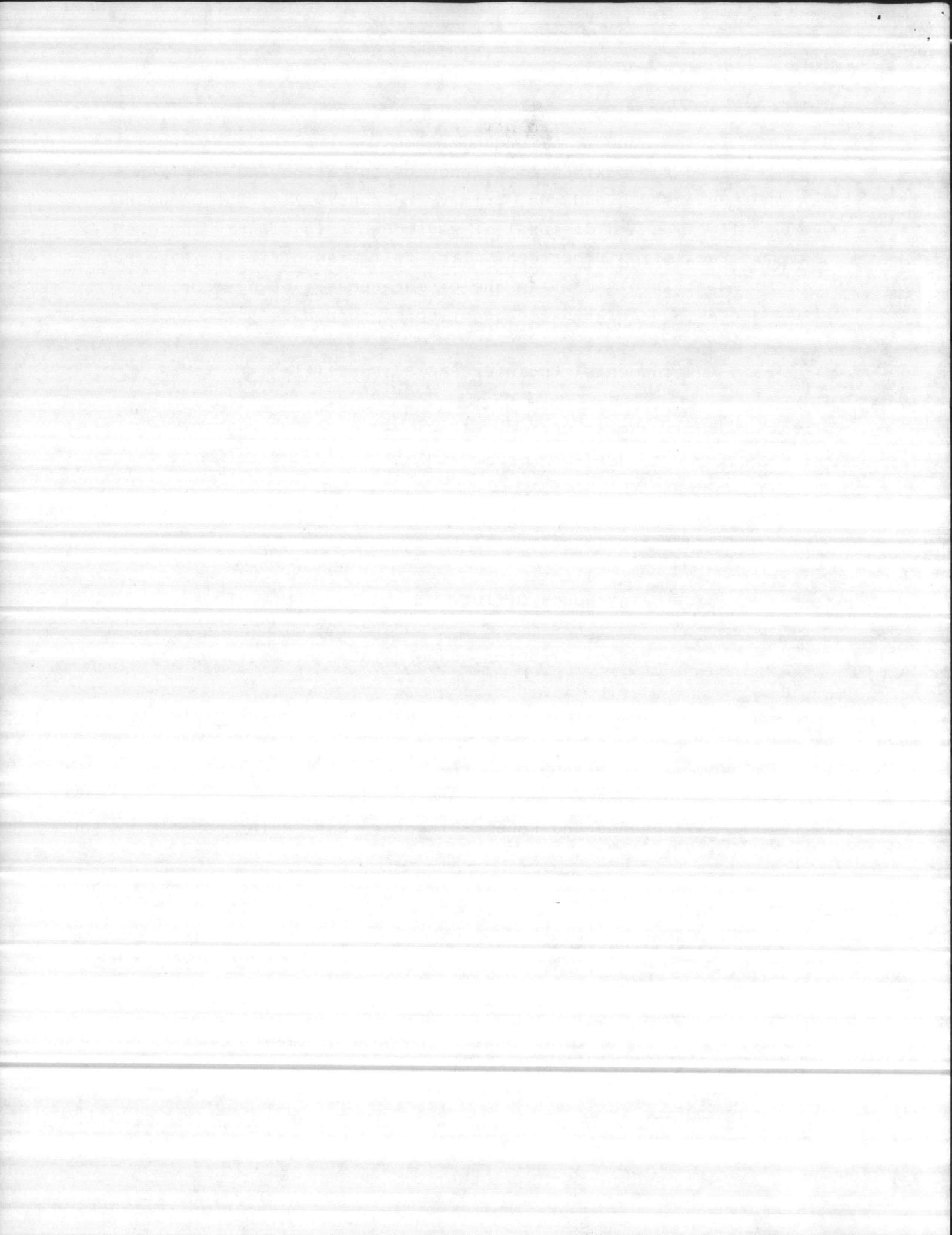
- d. Spill residues collected in liquid form
- e. Skimming from oil water separators and other oil pollution abatement facilities.
- f. Miscellaneous petroleum distillates which do not meet definition of HW.
- g. Miscellaneous petroleum distillates and oils which are mixed with regulated solvents or other HW.

With several hundred sites generating waste POL's, controls to prevent unauthorized dumping of regulated HW into waste POL's are very difficult to administer. Once used POL's are mixed together in drums or tanks, the appearance and physical characteristics of the mixture is such that the presence of regulated levels of HW is often undetectable, except by chemical testing. In addition to regulatory problems associated with unauthorized HW disposal into waste oil, contamination by HW, water, dirt, anti-freeze, detergents and other wastes greatly increase disposal costs. With costs of HW and waste oil disposal increasing and responsibilities for paying these costs being transferred to local activities, failure to minimize costs through better management of waste POL will adversely affect the mission. Historically, POL contaminated soil residues from spills and sloppy house-keeping have been disposed of as a solid waste at the Base Sanitary landfill. Regulations have tightened up in this area and there is a trend towards further restrictions. With groundwater being Camp Lejeune's sole source of drinking water, there is concern on part of several managers within the complex over the need to stringently control types of wastes placed in Camp Lejeune's landfill. It should be noted that the landfill is, to the best of our knowledge, operated in compliance with existing rules and standards.



3. While the support of organizations generating waste POL's is required for maximum efficiency of operation and compliance with regulatory standards, primary responsibility for managing the collection and disposal of waste POL's is clearly assigned to the Facilities Department. The following officials have had significant involvement in one or more phases of waste oil management and related emergency spill response:

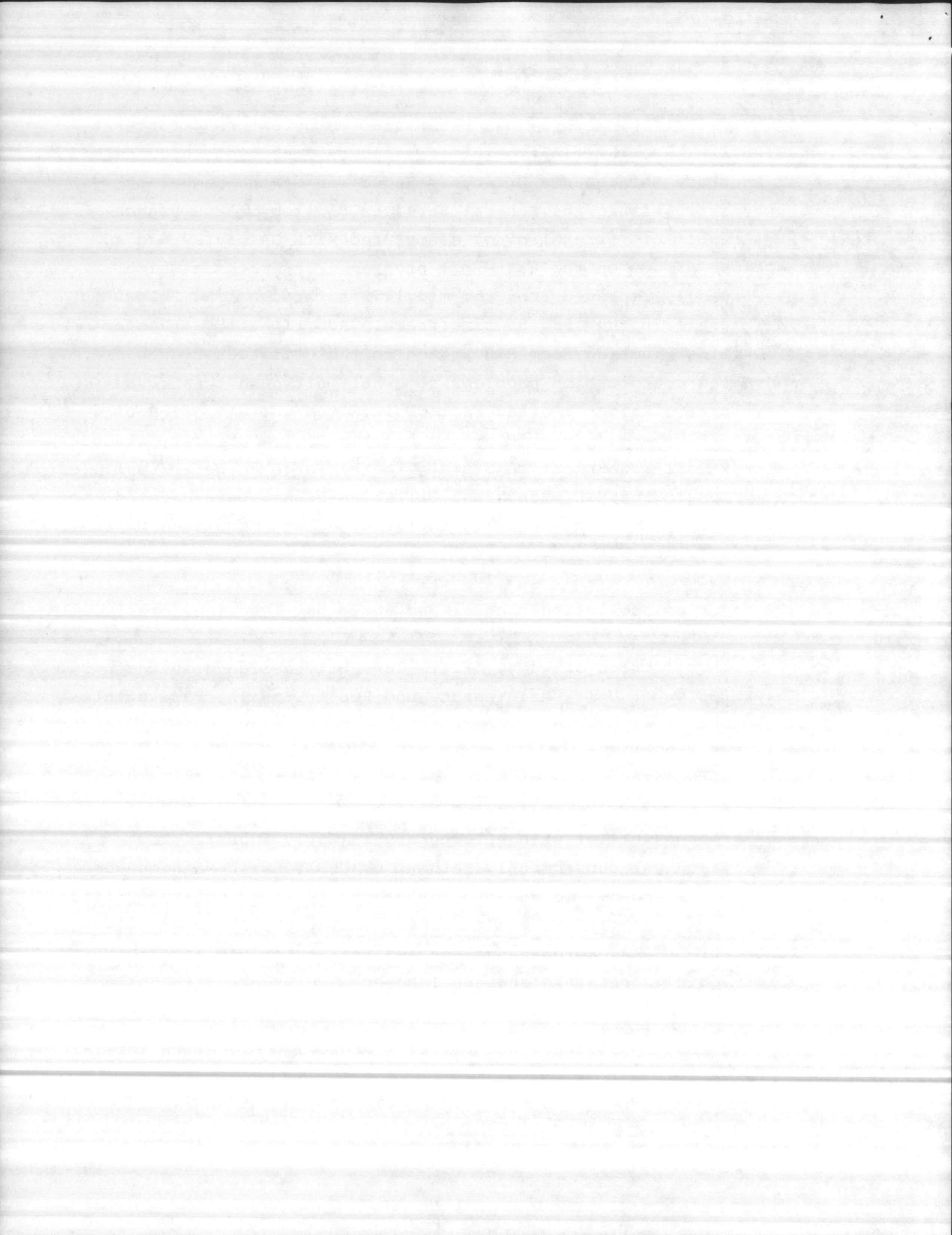
- a. Environmental Engineer, AC/S, Facilities
- b. Public Works Officer
- c. Base Fire Chief
- d. Base Fire Inspector(s)
- e. Base Maintenance Officer
- f. Admin Branch Director, Base Maintenance Division
- g. Utilities Branch Director, Base Maintenance Division
- h. Operation Branch Director, Base Maintenance Division
- i. Maintenance and Repair Director, Base Maintenance Division
- j. Outside Plumbing, Utilities Branch, (formally in M&R Branch)
- k. General Services
- l. Heavy Equipment General Foreman
- m. Director, NREAD



In addition, the program has been affected by external forces establishing priorities for utilization of personnel resources of the Base Maintenance Officer. Reduction of the number of supervisors within the General Services Section of M&R Branch as a result of "streamlining" associated with CA review had a negative effect on the waste oil program. The program which has steadily improved from the mid 1970's through 1983, began to deteriorate in the 1984-85 time frame. Additionally, transfer of Outside Plumbing from M&R Branch to the Utilities Branch increased coordination problems somewhat, although this issue was minor relative to other factors involved in relocation of Outside Plumbing. Currently, the relatively low priority placed on waste oil management combined with the large number of unfilled positions in the M&R Branch and Utilities Branch have created the current perception that an emergency exists requiring major organizational changes.

4. Major oil pollution control and abatement functions are:

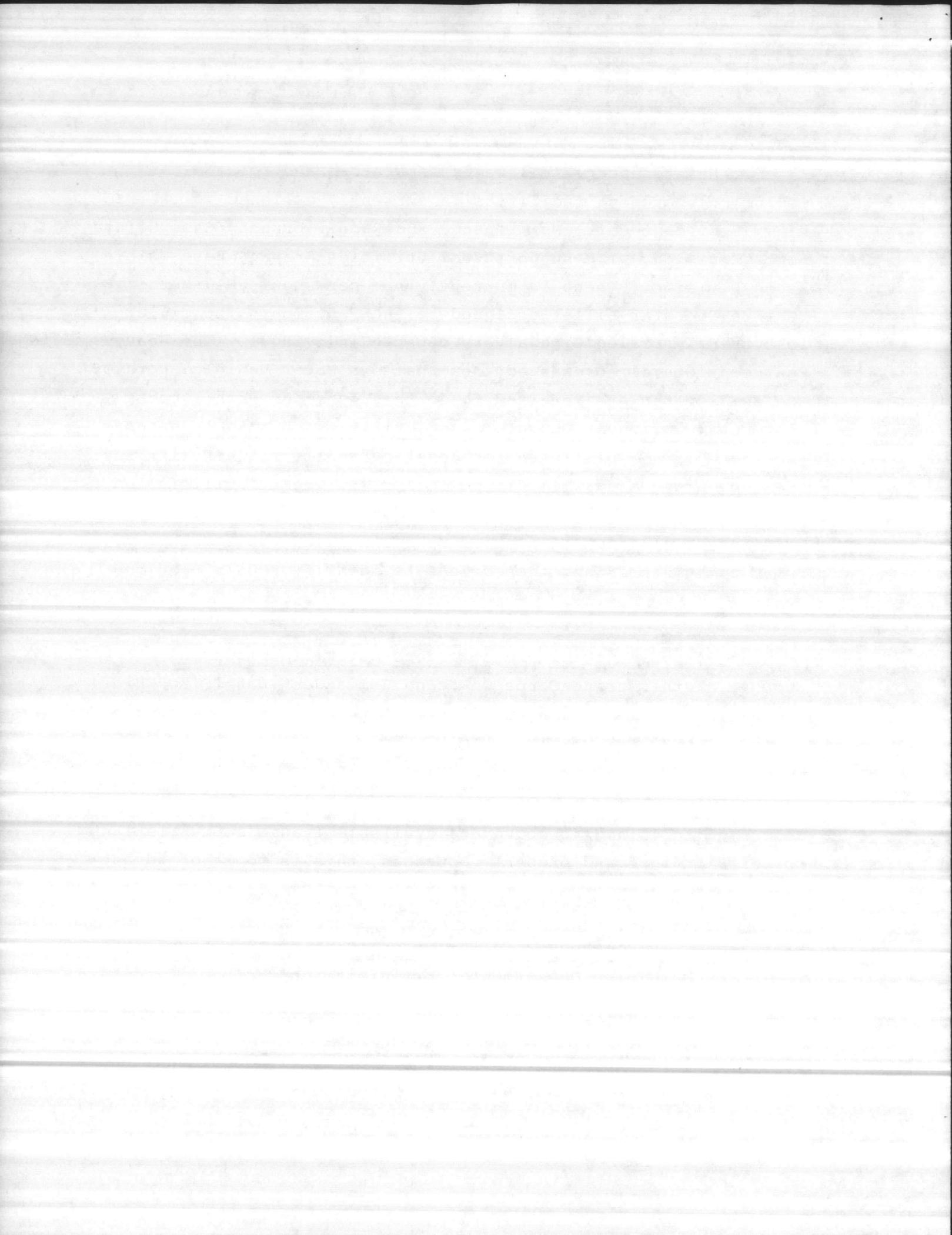
a. Collection of waste oil is currently assigned to the Heavy Equipment Unit, Maintenance and Repair Branch, Base Maintenance Division. There is currently one WG-7 Motor Vehicle Operator assigned to the function. The position became vacant this past summer when the incumbent took another position in Logistics Department. Base Maintenance submitted a requisition to fill the permanent billet with a temporary in early August. The requisition was subsequently returned by CPO to Base Maintenance. Base Maintenance is in the process of resubmitting the requisition to fill the position with a permanent employee. The Heavy Equipment General Foreman has advised that three billets (two motor vehicle operators and one laborer) are required to collect oil from collection points and skim oil from pollution abatement facilities. Addition of one billet (laborer) would allow initial



spill response capability.

b. Maintenance of oil water separators and related pollution abatement facilities is currently assigned to the Heavy Equipment Unit, Maintenance and Repair branch, Base Maintenance Division, with support from Utilities Branch, Base Maintenance Division. There is currently one permanent WG-7 Motor Vehicle Operator billet assigned to the function. The billet is currently filled with a very capable individual. The Heavy Equipment Genral Foreman advises that one Motor Vehicle operator and one laborer are required to do this function with support from Heavy Equipment Operators and Utilities personnel on an as required basis. Utilities personnel currently inspect lift stations associated with oil pollution abatement facilities on a routine schedule. Work involves cleaning grit and debris from facilities, clearing of stopped up drain lines, maintenance of pumps and controls and inspections to identify repair requirements.

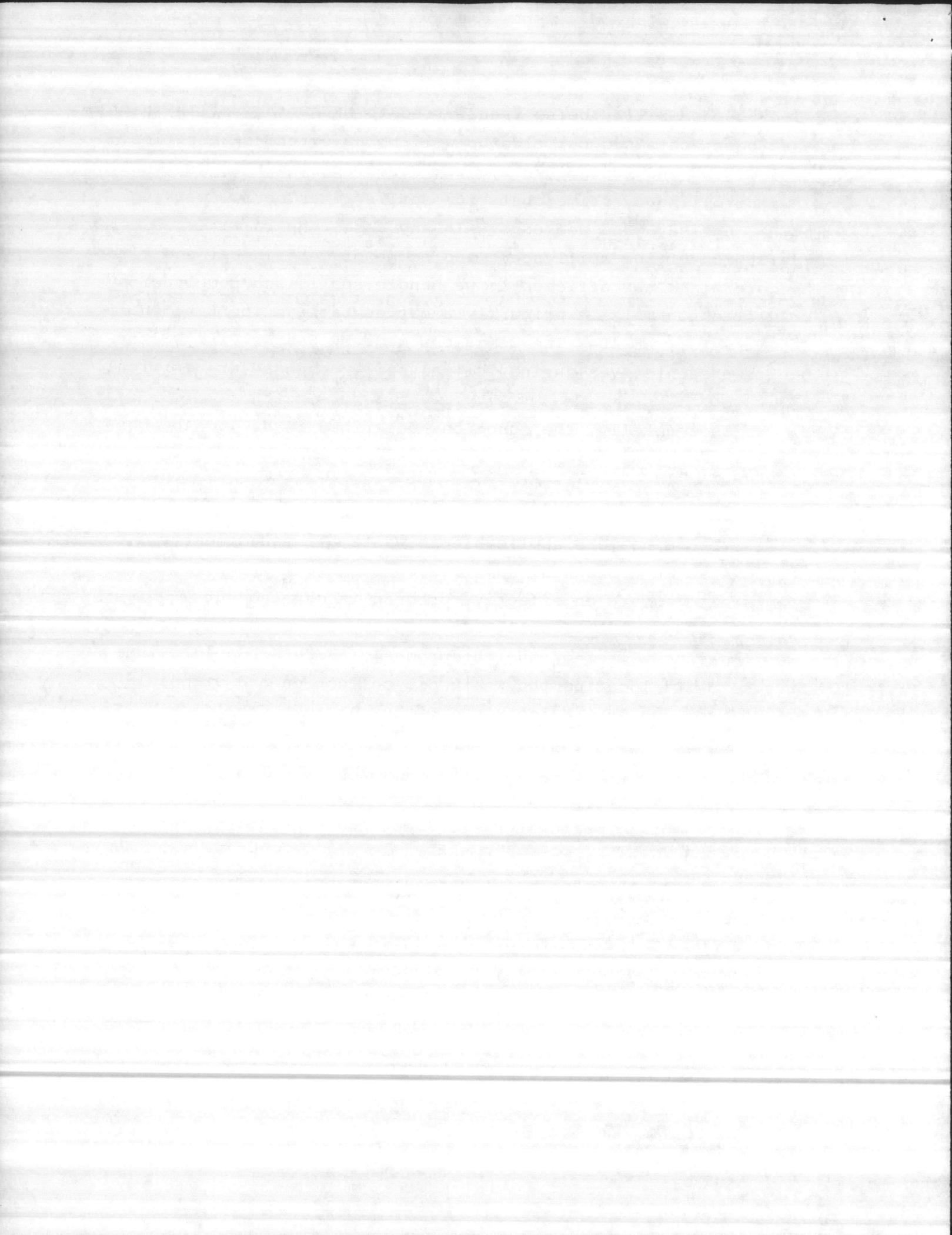
c. Response to oil and hazardous material spills in support of the Marine Corps On-Scene Commander (Base Fire Chief) requests for labor and equipment to contain and cleanup spills is a function affected by the proposed realignment. However, there is some confusion over the relationships between Facilities Department organizations in this area. As long as the personnel discussed in 4a and 4b above are available (radio communications) properly trained and properly equipped, this is no major advantage regarding ^d where they are assigned, i.e., BMO or NREAD. The significant issue is who will supervise them during actual spill containment and cleanup. In the majority of spills, aggressive action by Base Fire Department can minimize cost of spill containment and cleanup. Use of personnel/resources of the organization spilling the material should be utilized as the first source of labor/equipment/supplies. Supervision of spill containment and cleanup should be done by Base Fire Department wherever practical,



with responsibility being transferred to NREAD for spills which have been contained but cleanup will be an extended operation. Supervision and assistance by Base Fire Department is critical in controlling overtime costs for spills after normal working hours, holidays and weekends. In any case, the initial evaluation of the spill scene and scope of containment and clean-up determines how efficiently we handle spills and comply with regulations. This is primarily a matter between the Fire Chief and Director, NREAD. The decisions made by Senior Fire Department representatives during initial spill response are critical.

5. While generally, the functions described in 4a and 4b above have been grouped together for management; the collection, storage and disposal of waste oil is actually a relatively independent, stand alone function. With hazardous waste regulations becoming more applicable to waste oil management, specialized environmental and related technical knowledge are required to ensure an effective program is carried out. Unless burning of waste oil locally for recovery of energy becomes a major issue/aspect of the the program, there are no driving forces toward locating the waste oil collection and disposal function in the Base Maintenance Division except the flexibility offered due to larger work force. Maintenance of oil/water separators is an inherent maintenance function requiring routine support of several maintenance shops, particularly Outside Plumbing, Wastewater Treatment and Heavy Equipment. Specialized maintenance equipment is required which is also routinely used in other maintenance functions. An excellent argument can be made for separating the waste oil collection and ~~separating the waste oil collection~~ and disposal function from the oil/water separator maintenance function.

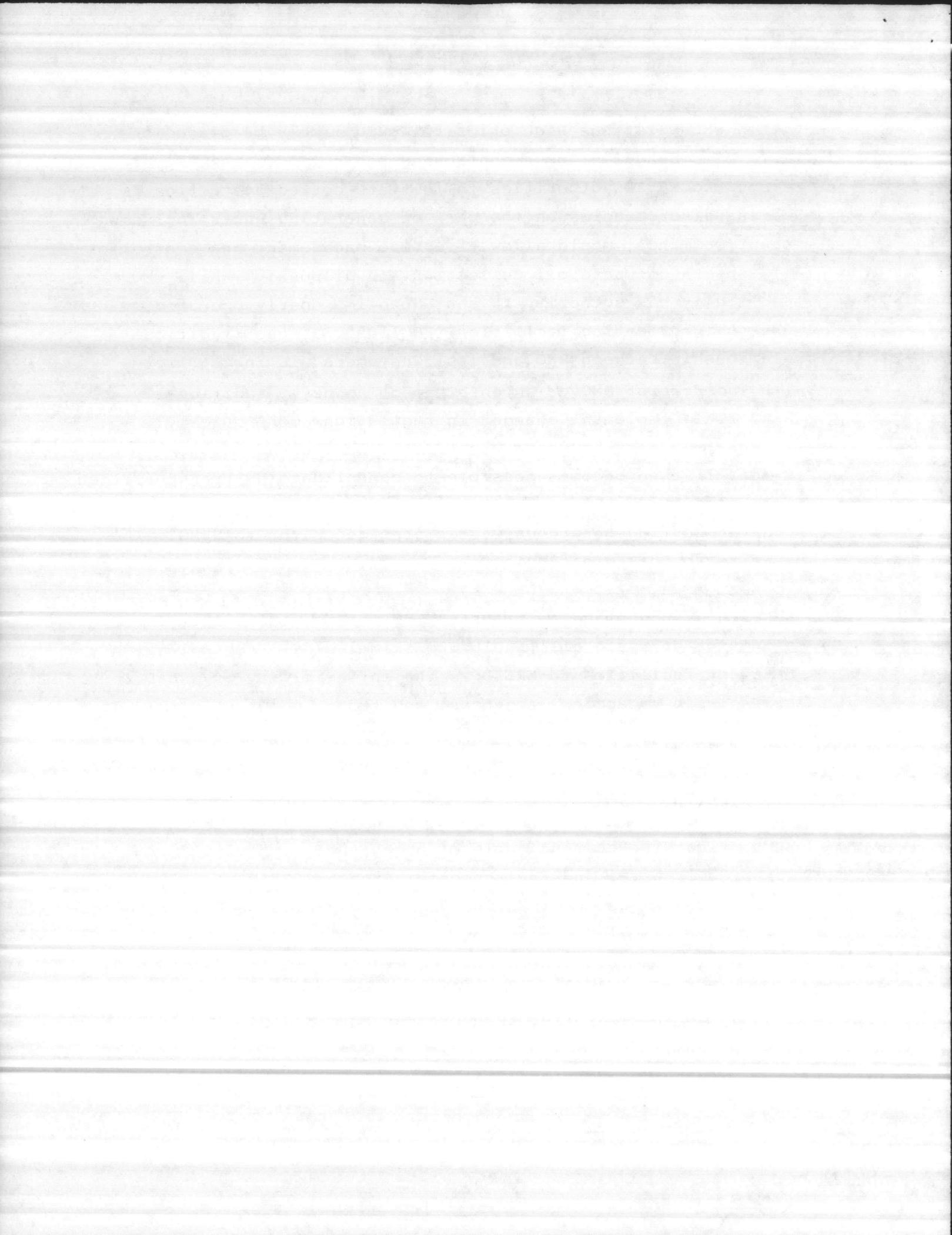
6. The advantages of placing the waste oil management function



within NREAD is that high priority would likely be placed on waste oil management on a continuing basis. Additionally, recognized NREAD authorities to initiate corrective action to address discrepancies on the part of generating units including tenant commands, would allow effective management and control of all aspects of waste oil collection and disposal. While BMO technically has authority to shut down improperly operated waste oil collection facilities (BO 11090.3), the traditional relationship between BMO and its "Customers" is in conflict with the role of BMO as an enforcement agency. Additionally, NREAD could implement changes in regulations more quickly if NREAD manages the above workforce. Another advantage is that it then becomes feasible to consolidate HW transportation (i.e. from AC/S, LOG to NREAD) and have NREAD assume responsibility for transporting hazardous wastes from generator to DRMO. The benefits to this area obvious.

The main disadvantage to transferring the responsibility for collection of waste oil (including skimming oil from pollution abatement facilities to NREAD is the inflexibility of NREAD in dealing with vacancies, absences, and sudden peaks of workload. If the following guidelines (expectations) are accepted by all parties involved, then transfer of the waste oil collection and disposal function should be successful.

- a. That the current table of organization (equivalent) of the Soil, Water and Environmental Branch, NREAD, is maintained plus the additional billets, shown in recommended action #1 below;
- b. That use of overtime by the Branch will frequently be relatively high, if the Branch plays any significant role in cleaning up spills (other than present advisory capacity);
- c. That the additional billets will be skilled positions

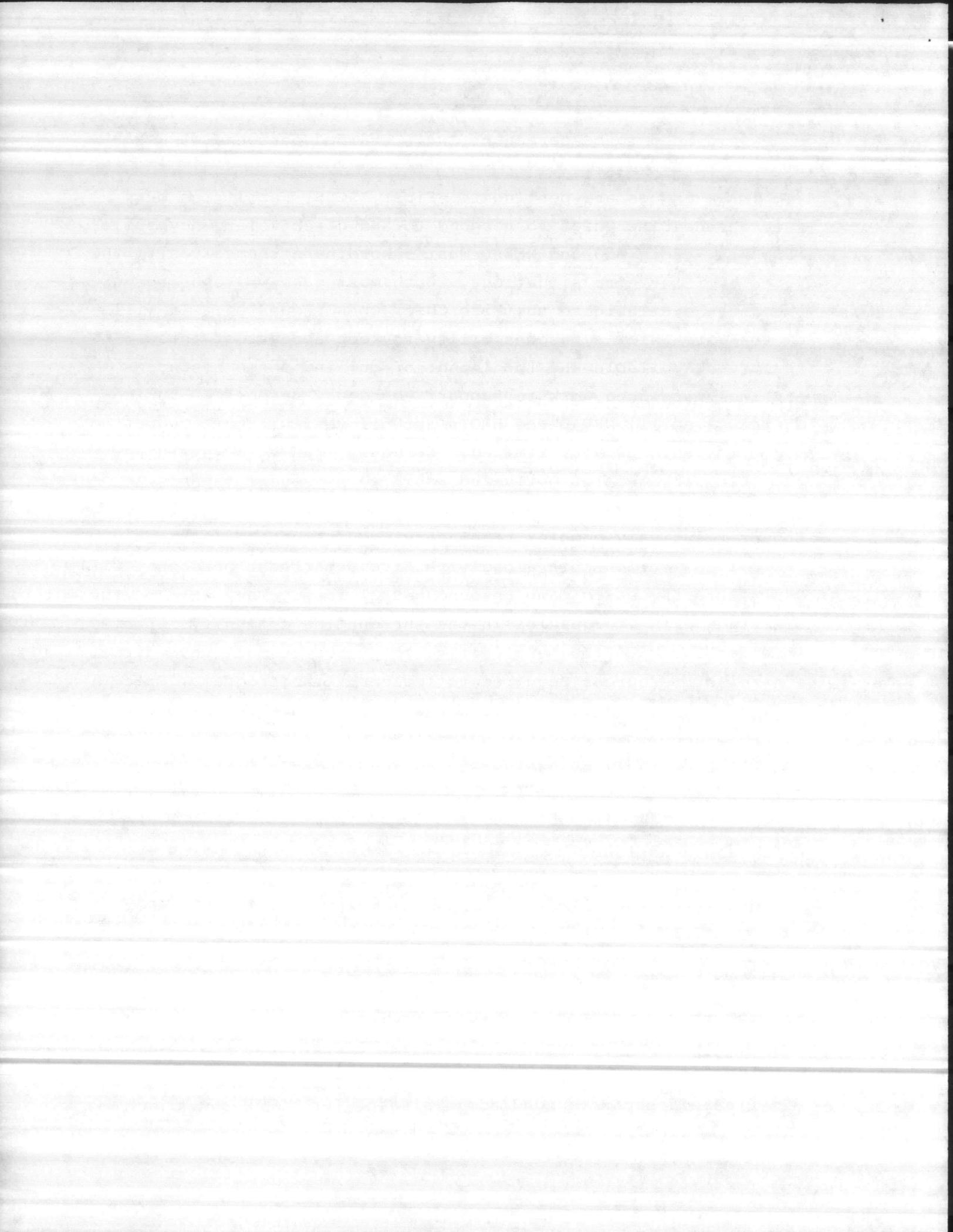


and would need to be permanent, well trained personnel;

7. Three issues are pertinent. First, AC/S, Facilities must rely on the Fire Chief to respond to and direct emergency spill response. Both BMO and NREAD must subordinate themselves to the Fire Chief in these situations. Both must make whatever resources they have available to the Fire Chief when requested. It will be the Fire Chief's responsibility to keep abreast of those resources available and the impact of pulling these resources off their assigned work to support emergency response. During an actual spill, NREAD and BMO's authority to withhold requested support should be very limited. Secondly, can we maintain a stable workforce of motivated, skilled personnel capable of making good, safe judgements under the stress of emergencies and/or relatively complex regulatory requirements? Inevitably, the oil collection crew along with Fire Department personnel will constitute the basic Camp Lejeune HAZMAT Team. They will be subject to assisting with emergencies in the surrounding community. Lastly, in order for NREAD to be effective the Director must have direct control of resources required to implement the program. Specifically, NREAD must control its budget and financial management. It is unacceptable that the Natural Resources Officer must obtain funding from its peer organization, Fund Administrator 23, Base Maintenance.

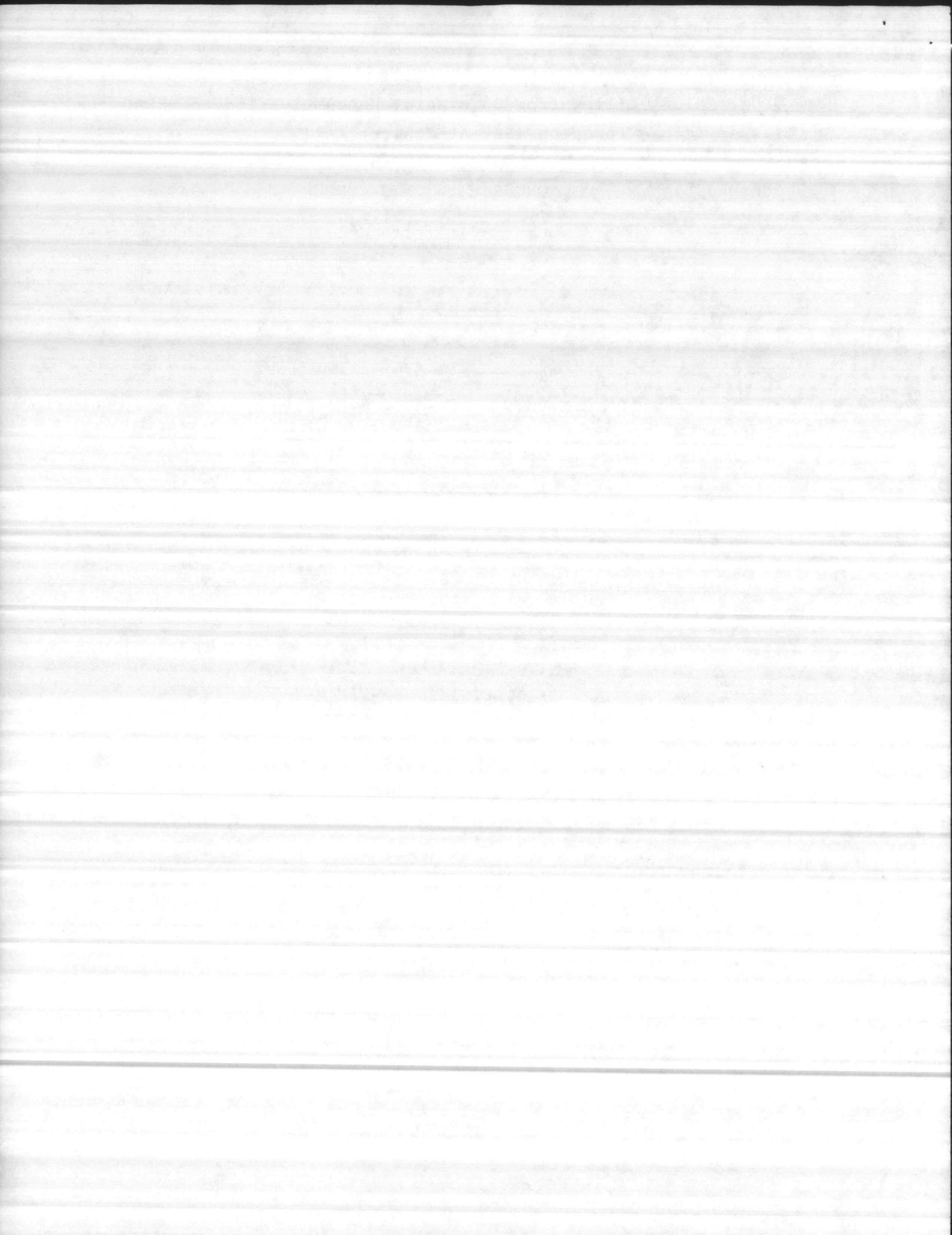
Recommended Action:

1. Transfer waste oil management to NREAD (See Attachment (A) for functions)
2. Consolidate responsibility for maintenance, repair of oil/water separators and related wastewater collection, pretreatment and disposal facilities under the Utilities Branch, Base Maintenance Division (See Attachment (B) for functions).
3. Create a separate fund administrator for NREAD and transfer



a budget clerk billet from Base Maintenance Division to NREAD to support this function (See Attachment (A)).

<u>Recommendation</u>	CONCUR	NON-CONCUR	DATE
BMO	#1	_____	_____
	#2	_____	_____
	#3	_____	_____
NREAD	#1	_____	_____
	#2	_____	_____
	#3	_____	_____
AC/S, Comptroller: Recommendation	#3	_____	_____
	APPROVED	DISAPPROVED	
AC/S, Facilities	#1	_____	_____
	#2	_____	_____
	#3	_____	_____



TRANSFER OF WASTE OIL MANAGEMENT FROM BMO TO NREAD

FUNCTION

RESOURCES

NREAD

MAINTENANCE

Waste oil collection

1-Supervisor
 2-WG-7 Motor Vehicle Operators
 1-Laborer
 2-Oil collection trucks
 1-Oil skimming truck
 Storage Tanks, accessory bldgs and structures:
 S-888
 S-889
 S-890
 S-891
 STT-61
 STT-62
 STT-63
 STT-64
 STT-65
 S-781

1. Assume total management and execution for collection, storage, disposal and administration of waste oil.
 2. Request AC/S, Comptroller to assign NREAD as Program Administrator for Class II Property.
 3. Assign Program Supervisor from in-house assets.

1. Transfer equipment and billets to establish 2 vehicle operators, 1 laborer and 1 clerk position in NREAD.

Accessory bldgs and structures associated with the above storage tanks.

Oil and hazardous material spill response

Maintain inventory of specialized spill response equipment and supplies including but not limited to preloaded trailer loaded with 500 ft of floating boom, matting, pom, hand tools, drums for hazardous material, absorbent etc.

1. Provide first response for containment & cleanup of spills requests from Base Fire Dept.
 2. Request assistance for heavy equipment or labor for spills beyond own capability from Base Maintenance.

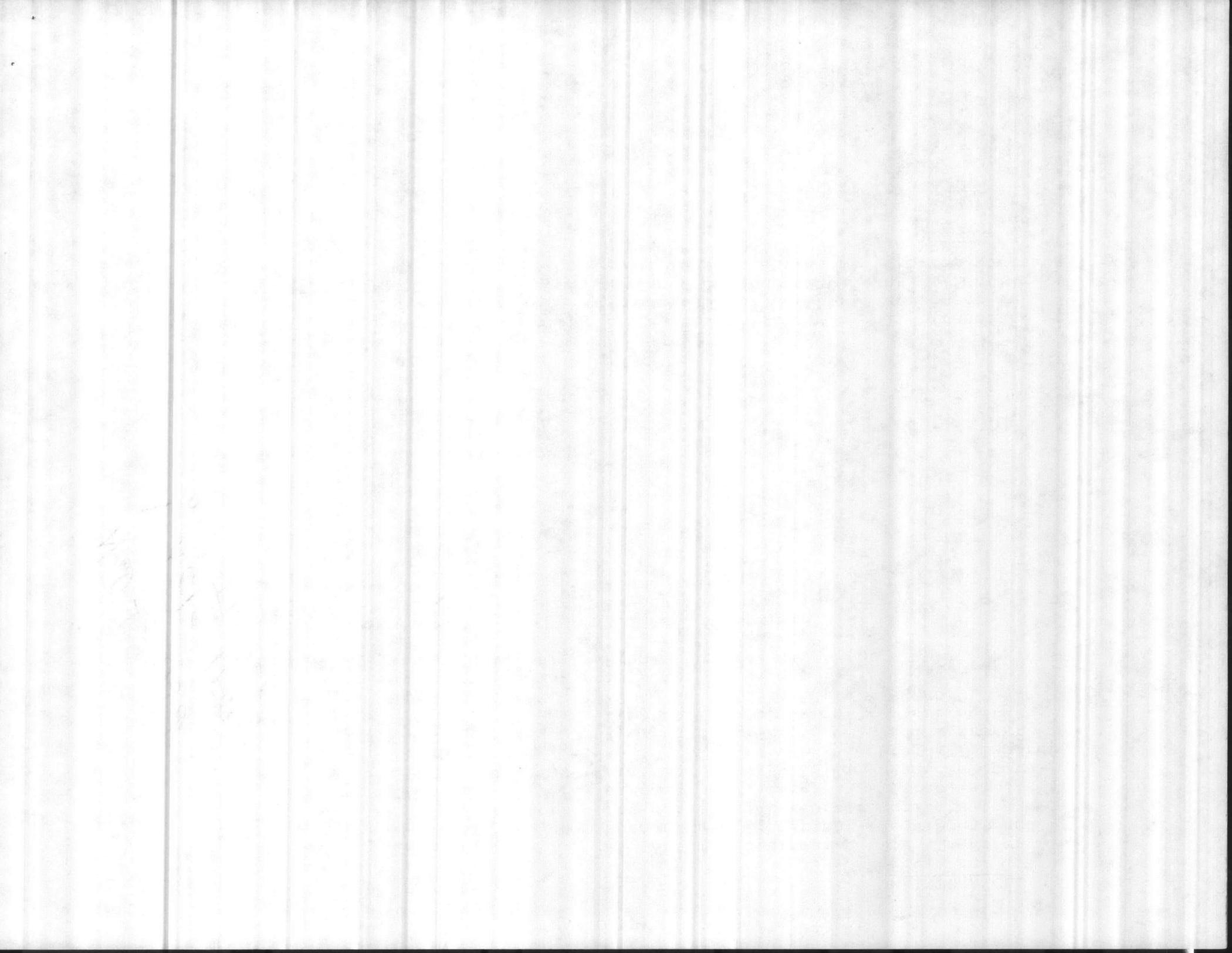
1. Transfer equipment to establish 1 laborer position in NREAD.

Provide assistance as requested.

1-laborer

Need to add Vehicles / Forklift and Trailer

Attachment (A)



FUNCTION

RESOURCES

NREAD

MAINTENANCE

Office Space

All of Bldg 1103 not assigned to Special Services & the Paint Shop Area at South West End of Bldg 1102

1. Assume custody of Bldg 1103 & designated portion of 1102
2. Request AC/S, Comptroller to transfer Bldg 1102 & Bldg 1103 to NREAD.

1. Assist with re-assignment of Bldgs 1102 & 1103.
2. Move Plumbing Shop from Bldg 1103.

Budget/Financial

Budget Clerk

1. Assume total responsibility for budgeting, financial management, and administration of funds assigned to NREAD and Environmental Engineer.

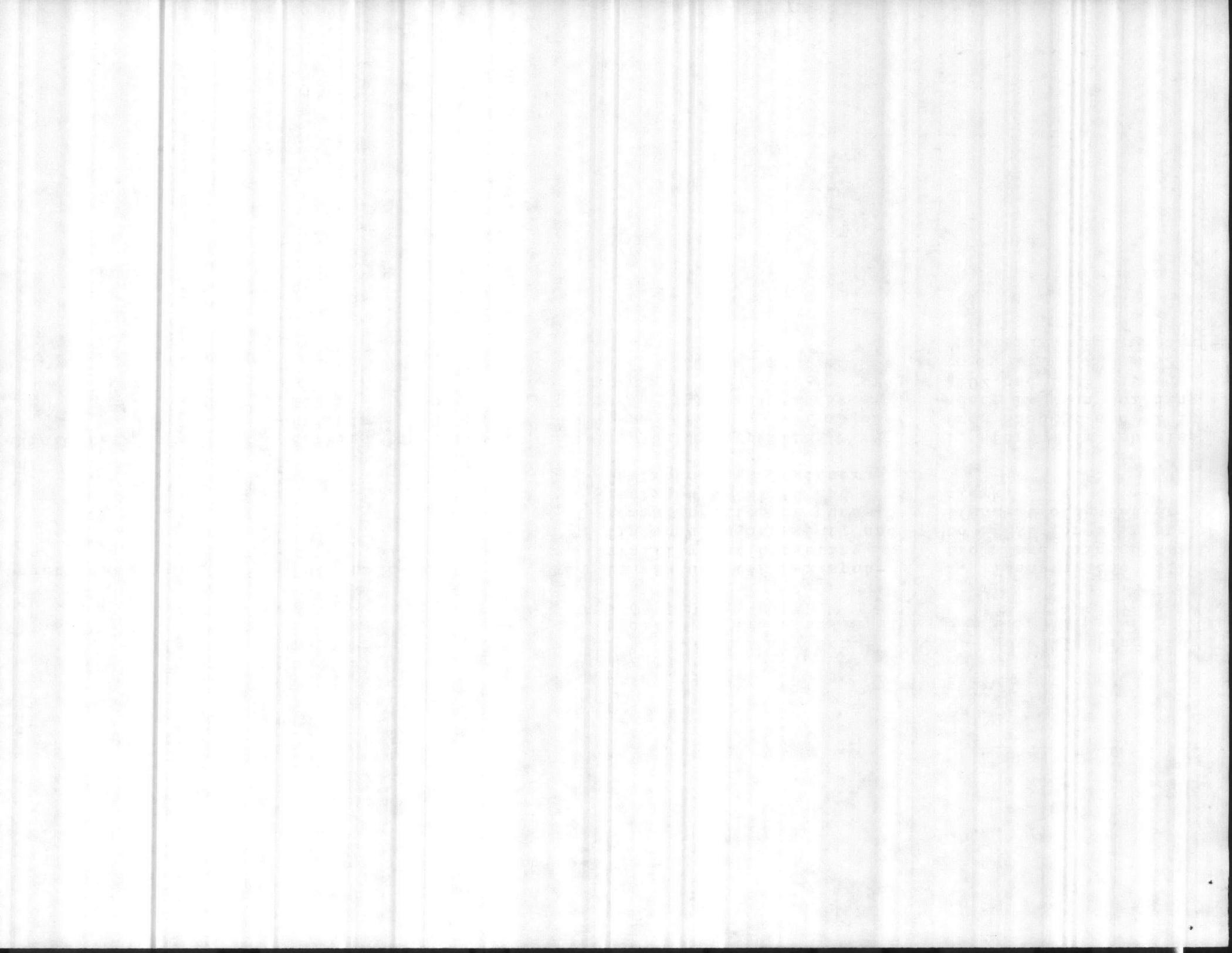
1. Transfer one billet from Base Maintenance to NREAD for the establishment of a budget clerk.

Vehicle Parking

Parking lot between Buildings 1102 and 1103.

1. Utilize parking space adjacent to portions of Bldgs 1102 and 1103 assigned to NREAD.

1. Park only vehicles from Shop 61 and 62 in space between Building 1102 and 1103 adjacent to portions of Bldg 1102 occupied by Base Maintenance.



CONSOLIDATION OF RESPONSIBILITY FOR MAINTENANCE AND REPAIR OF OIL-WATER SEPARATORS AND RELATED WASTEWATER COLLECTION, PRETREATMENT AND DISPOSAL FACILITIES UNDER UTILITIES BRANCH, BASE MAINTENANCE DIVISION

<u>FUNCTIONS</u>	<u>RESOURCES</u>	<u>UTILITIES BRANCH</u>	<u>MAINTENANCE & REPAIR BRANCH</u>
Maintenance of oil-water separators, including cleaning & inspection	1 vac all truck 1 motor vehicle operator 1 laborer	1. Assume operational support of all oil-water separators to include cleaning & inspection. 2. Request assistance from M&R Branch for heavy equipment support on large separators such as Boat Basin & Courthouse Bay.	1. Transfer equipment and two billets. 2. Provide heavy equipment support as requested.
Servicing containment basins at Fire Protection Division burn pits used for fire fighter training.	No additional	1. Assume responsibility.	1. None.
Monitoring & disposing of PCB transformers including inspecting and maintaining records.	Dedicated area in Lot 140	1. Coordination with Base Environmental Staff 2. Maintain inventory of all PCB transformers in use at CLNC. 3. Assume custody of PCB transformers from BMaint or from contractors that are taken out of service. 4. Dispose of PCB transformers that are no longer required at CLNC.	1. Assign dedicated area in Lot 140 to Utilities for temporary storage of PCB transformers awaiting disposal. 2. Assist in spill response

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