



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

IN REPLY REFER TO:

6240  
NREAD  
9 Mar 89

From: Director, Natural Resources and Environmental Affairs  
Division

To: Assistant Chief of Staff, Facilities

Subj: CENTRALIZATION OF MANAGEMENT OF HAZARDOUS WASTE TURN-IN  
AND RELATED TRANSPORTATION BY GENERATORS OPERATING UNDER  
THE BASE EPA HW IDENTIFICATION NUMBER NC6170022580

Ref: (a) Mtg btwn AC/S, FAC, SJA, and Dir, NREAD of 6 Mar 89  
(b) NC Division of Health Services Compliance Order,  
Docket #89-029

Encl: (1) Proposed organizational changes to accommodate the  
Director, NREAD assuming responsibility for the  
processing of hazardous waste (HW) turn-ins to DRMO by  
Marine Corps Base and Base Tenants  
(2) Dir, NREAD memo 6240 NREAD dtd 23 Dec 87 w/encl  
(3) AC/S, FAC memo 6280 FAC dtd 27 Jan 89

1. Enclosures (1), (2) and (3) are provided in response to reference (a) and recent instructions of the Chief of Staff, Marine Corps Base, Camp Lejeune. Enclosure (1) provides a minor restructuring of responsibilities between NREAD and Base Maintenance Division to enable NREAD to assume the subject responsibilities. Implementation of enclosure (1) will require the following additional personnel:

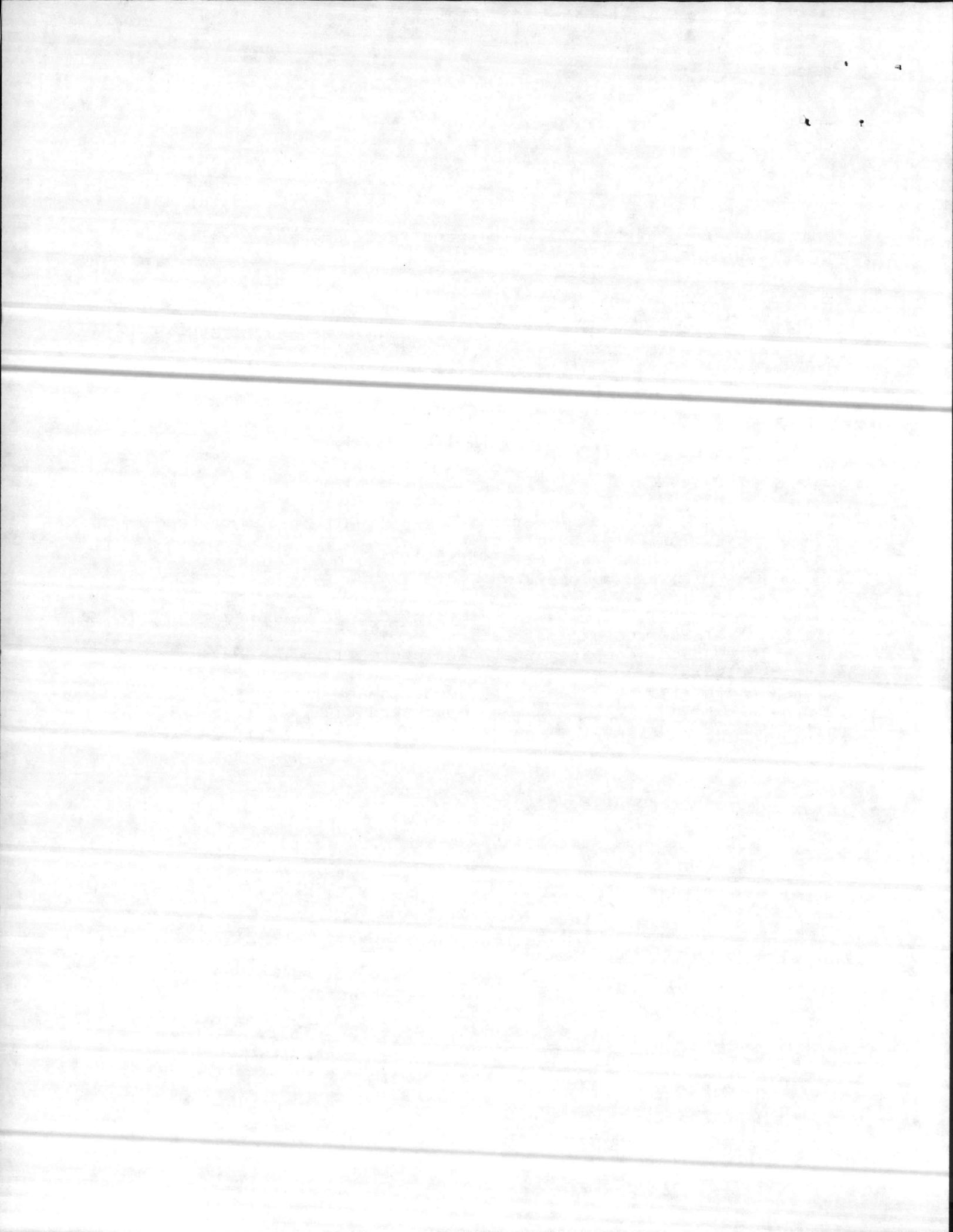
a. NREAD

- (1) Clerk/Typist, GS-5
- (2) Hazardous Waste Disposal and Minimization Specialist, GS-9

b. Utilities Branch, Base Maintenance Division

- (1) Two Motor Vehicle Operators, WG-8

Enclosures (2) and (3) provide background required to understand enclosure (1). You will immediately recognize enclosure (1) to be an update of the proposal I provided to you in enclosure (2) which you reviewed prior to publishing enclosure (3). Please note that enclosure (1) does not address actions directed by enclosure (3) which have been implemented and are not affected by enclosure (1).



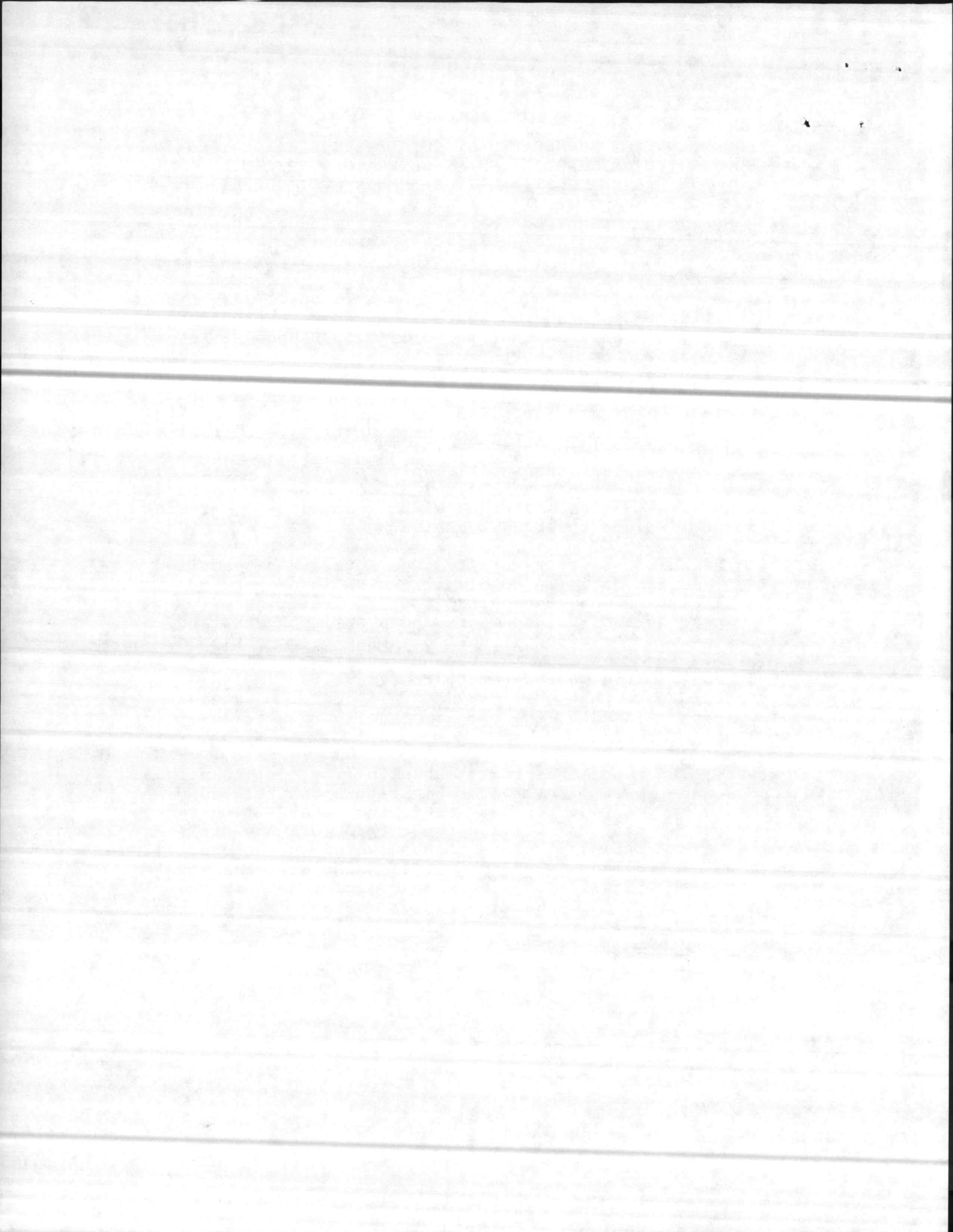
Subj: CENTRALIZATION OF MANAGEMENT OF HAZARDOUS WASTE TURN-IN  
AND RELATED TRANSPORTATION BY GENERATORS OPERATING UNDER  
THE BASE EPA HW IDENTIFICATION NUMBER NC6170022580

2. NREAD has long recognized that waste oil management problems must be corrected to achieve satisfactory compliance with HW regulations. In enclosure (2), I advised you that NREAD could both satisfactorily manage waste oil and assume increased responsibility for oil and hazardous substance spill response and for transporting base hazardous waste if NREAD were provided six billets. I further advised that the Utilities Branch, Base Maintenance Division could satisfactorily manage, operate and perform maintenance of oil water separators and related pollution abatement facilities if provided two billets and the VACALL truck. Enclosure (2) also provided the recommendations of the former Base Maintenance Officer, Col M. G. Lilley. Col Lilley recommended that you assign NREAD only five billets. Col Lilley's proposal did not address transportation of hazardous waste. You subsequently assigned NREAD all of the above three functions and six billets (at least two less than NREAD recommended). These figures do not include the budget analyst.

3. During reference (a), the Staff Judge Advocate was advised that NREAD made the decision to divert two HW inspectors to manage waste oil. Please be advised that the shifting of personnel involved two HW inspectors and a soil conservation technician and was the direct result of NREAD being assigned responsibility for cleaning, maintenance and repair of oil water separators and related wastewater pretreatment facilities. It is important to note that this oil/water separator management function is not related to the compliance with regulations addressed by reference (b).

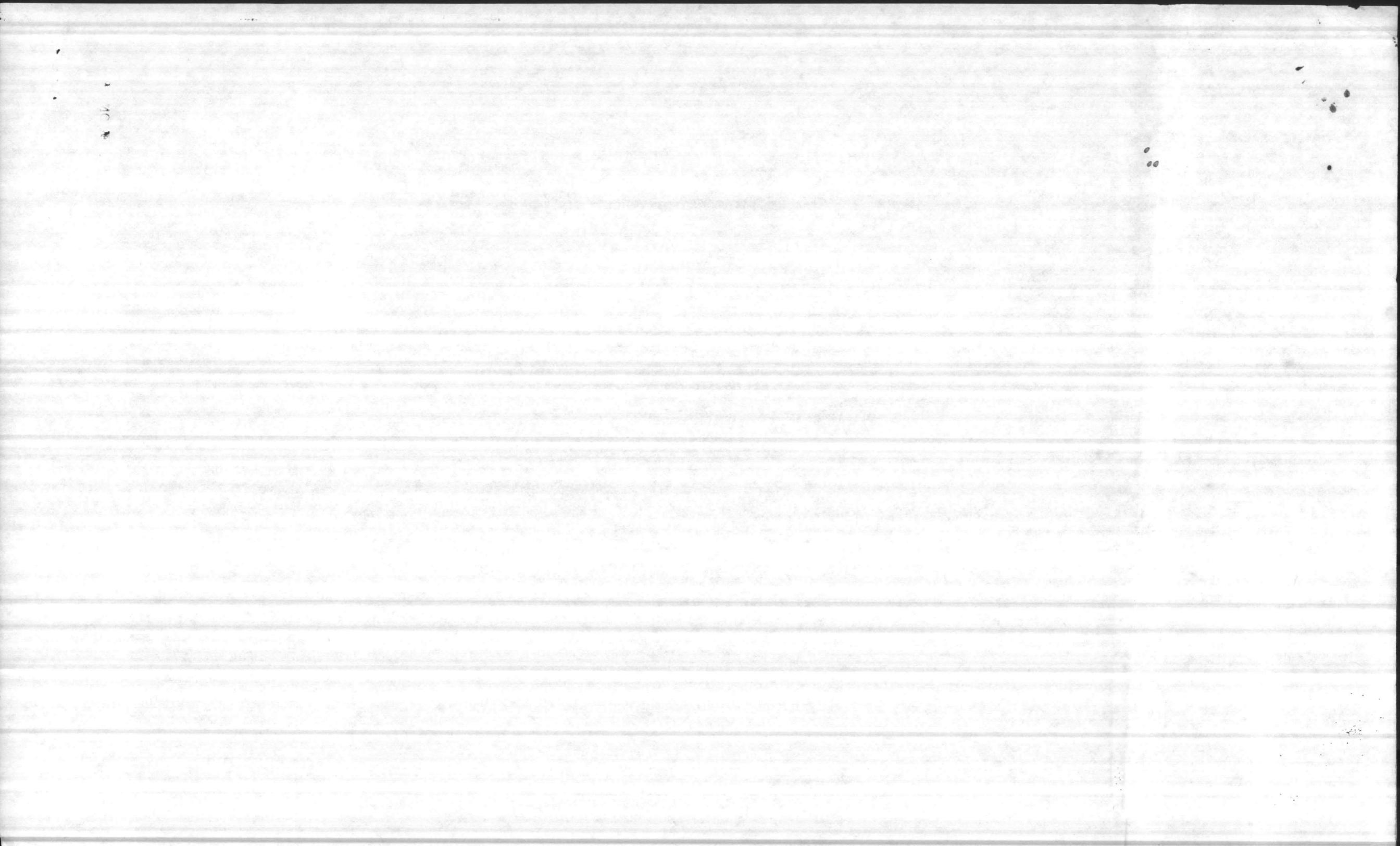
4. Enclosure (1) recommends that responsibility for cleaning, maintenance and repair of oil water separators and related facilities to be returned to Base Maintenance where it belongs. NREAD must assume that the billets to do this work are still located in Base Maintenance since as documented in enclosure (2) they were never provided to NREAD. It is NREAD's professional opinion based on years of practical experience that only the Utilities Branch currently has the capability and willingness within Base Maintenance to manage the oil water separator maintenance and repair program.

  
J. I. WOOTEN



PROPOSED ORGANIZATIONAL CHANGES TO ACCOMMODATE  
THE DIRECTOR, NREAD ASSUMING RESPONSIBILITY FOR THE PROCESSING OF  
HAZARDOUS WASTE (HW) TURN-INS TO DRMO BY MARINE CORPS BASE AND TENANT COMMANDS

<u>FUNCTION</u>	<u>RESOURCES</u>	<u>NREAD</u>	<u>BASE MAINTENANCE</u>
Collection, transportation and disposal of HW and waste oil from base generation sites (see note 1). Assist Base Fire Department with oil and hazardous material (HM) spill response.	<ul style="list-style-type: none"> <li>1-Supervisor</li> <li>1-HW Minimization and Disposal Specialist, GS-9</li> <li>1-Clerk Typist, GS-5</li> <li>1-Biological Tech, GS-9</li> <li>1-Biological Tech, GS-7</li> <li>1-Motor Vehicle Operator Foreman, WS-6</li> <li>3-Motor Vehicle Operators, WG-8 (see note 2)</li> <li>1-Heavy Laborer, WG-3</li> <li>2-Oil Collection/skimmer trucks</li> <li>1-Large stake body truck (see note 3)</li> <li>1-Industrial fork lift</li> <li>1-Trailer compatible with truck and fork lift</li> <li>1-Building with SPOC and security</li> </ul>	<ol style="list-style-type: none"> <li>1. Assume overall responsibility for the management and execution for collection, transportation, storage, disposal and administration of waste oil disposal for entire Camp Lejeune Complex.</li> <li>2. Develop procedures in conjunction with AC/S, Logistics (TMO) for TMO to provide HW transport on the public highway which will require HW manifest per RCRA.</li> <li>3. Assume total management and execution of HW pickup and transportation to EPA approved TSD facility (principally DRMO) except as provided by TMO per item 2 above.</li> <li>4. Provide all personnel resources shown except: 1-Clerk Typist, GS-5; 1-HW Minimization and Disposal Specialist, GS-9 (see note 4).</li> <li>5. Provide specialized spill response equipment, supplies and technical assistance required for managing typical spills events. Coordinate the obtaining and funding of spill cleanup contract services for spill events exceeding local capability. Operate specialized spill response equipment which NREAD provides as requested by Base Fire Chief as On-Scene-Commander (OSCMDR). Collect and dispose of spill residues which the generator cannot safely handle.</li> <li>6. Coordinate the training of BMO personnel involved in spill response.</li> <li>7. Transfer Vac All truck to BMO.</li> </ol>	<ol style="list-style-type: none"> <li>1. Assume operation and maintenance of all oil-water separators to include cleaning. Does not include routine skimming of waste oil for disposal. Will coordinate with NREAD for oil skimming support services required for the routine servicing of the structures and associated pumps and piping by BMO. Implementation will be in accordance with attachment (a).</li> <li>2. Provide heavy equipment and other spill response support as requested by the OSCMDR.</li> </ol>
Maintenance of oil-water separators, including cleaning and inspection. Servicing containment basins at Fire Protection Division burn pits used for fire fighter training.	See attachment (a) for required resources.		



NOTE 1: This action does not affect the manner in which Marine Corps Air Station, New River currently processes their HW turn ins. TMO would continue to pick up Air Station wastes after DRMO has inspected. This change would result in the bulk of Base and Base tenant HW being transported to DRMO prior to DRMO inspecting the waste. Any waste which DRMO would turn down would be returned to the generator for corrective action unless the problem is caused by NREAD handling during transportation. It is estimated that NREAD will be hauling wastes approximately three days a week. Approximately two days a week would be required for inspections of HW and assisting in proper containerization and packaging.

NOTE 2: Each Motor Vehicle Operator would be periodically operating a tractor trailer (see note 3). This would require an upgrade of each existing motor vehicle operator. Motor Vehicle Operators would be available to operate motor vehicle under TMO direction to transport MCAS, New River HW to DRMO. The potential for use of a commercial hauler for public highway transportation is an excellent option.

NOTE 3: It is assumed that the tractor trailer recently provided to AC/S, Logistics for the transportation of HW would be made available to NREAD. It is likely that efficient operation of the waste oil collection program will result in the internal use of a tractor trailer type tanker.

NOTE 4: This proposal requires the addition of two billets (HW Minimization and Disposal Specialist, GS-9 and Clerk Typist, GS-5) to NREAD staff and at least two billets (Motor Vehicle Operators, WG-8) to the Utilities Director, Base Maintenance Division staff (see attachment (a)). Duties of the two additional NREAD billets are:

a. Clerk/Typist - GS-5:

(1) Initially receive HW turn-in documents from tenant commands.

(2) Check documents for compliance with applicable turn-in requirements and conformance with administrative requirements of outside regulatory agencies.

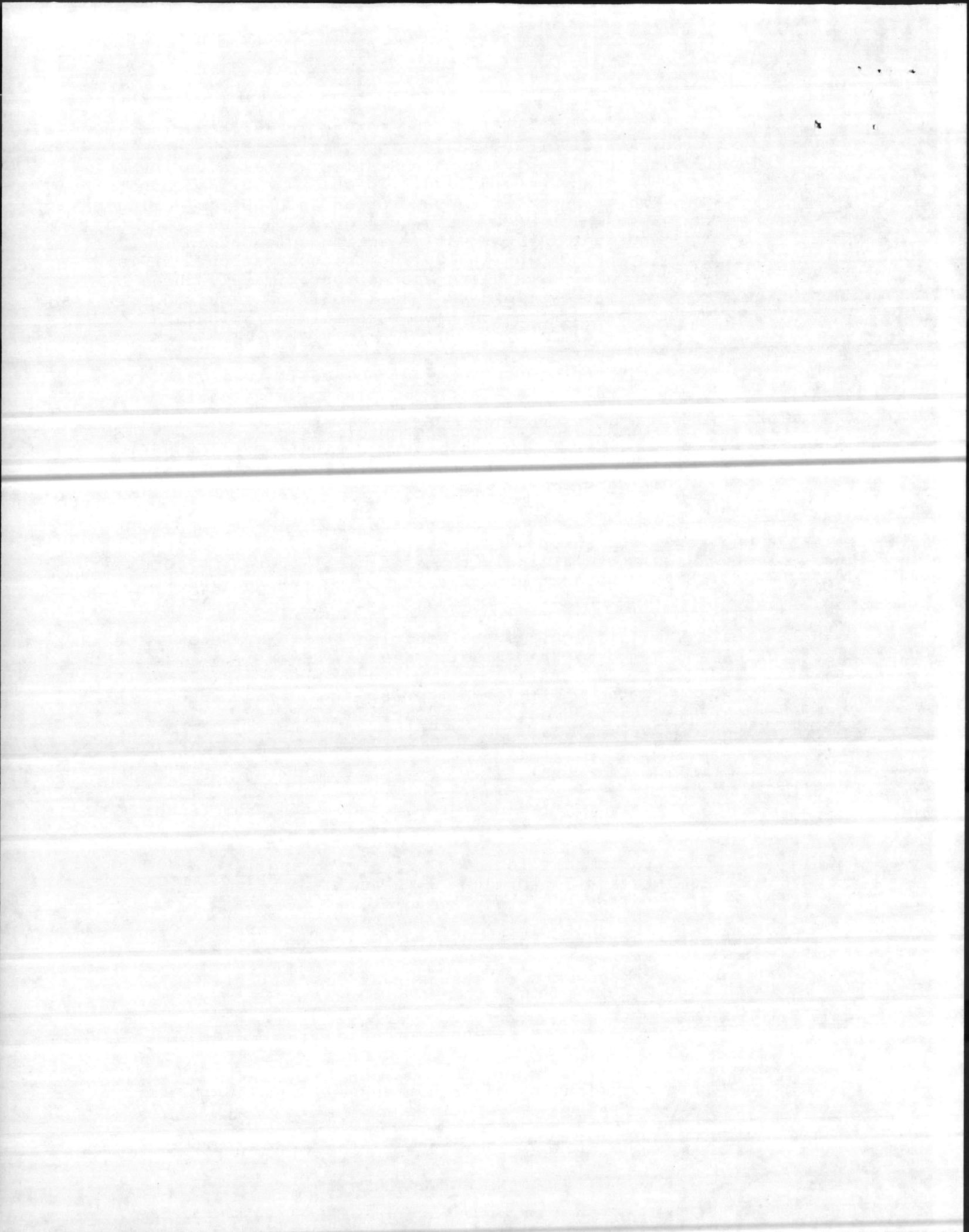
(3) Enter document into computerized tracking system.

(4) Screen documents to ensure that only authorized personnel have signed.

(5) Screen documents to ensure that none are approaching deadlines for pickup.

(6) Sort documents by major command and location of storage site.

(7) Prepare a pickup order and provide to transportation supervisor.



(8) Provide a list of discrepancies to supervisor after attempting to resolve with the cognizant HMDO by telephone.

(9) After transportation supervisor has inspected waste and confirmed the quantities/volumes and appropriate waste identification number(s), the clerk will in cooperation with Budget Analyst for NREAD, enter the appropriate funding codes on the document. Will assist budget analyst keep up with obligations and expenditures of disposal funds.

(10) Monitor pick up and delivery of hazardous wastes to TSD facility so as to ensure compliance with mandated deadlines.

b. Hazardous Waste Minimization and Disposal Specialist, GS-9:

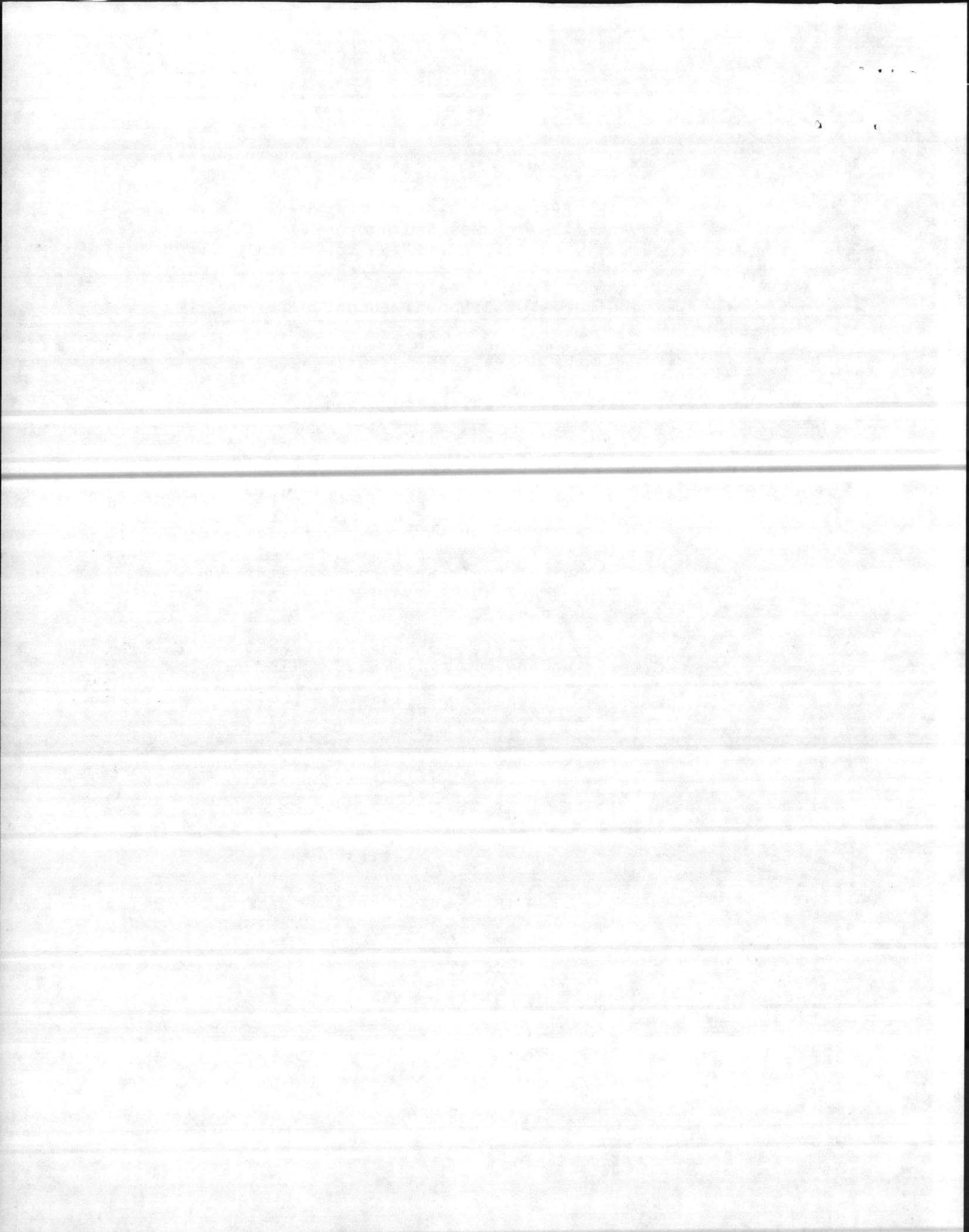
(1) Monitors all DRMO hazardous waste disposal transactions to ensure that the disposal is both cost effective and in compliance with applicable EPA and State waste treatment standards. Determination will be based on the written audit trail of DRMO and contacts with regional DRMO specialists.

(2) Provide technical assistance to generators on techniques for waste management which minimizes volumes, toxicity and disposal costs for wastes generated.

(3) Keep abreast of various industrial processes aboard the Camp Lejeune complex and develop alternatives for process changes and hazardous material substitutions which minimize volumes of hazardous wastes generated without adversely affecting mission requirements.

(4) Review proposed new industrial facilities and equipment and make recommendations for changes and improvements required to promote efficient management of hazardous wastes and to facilities disposal.

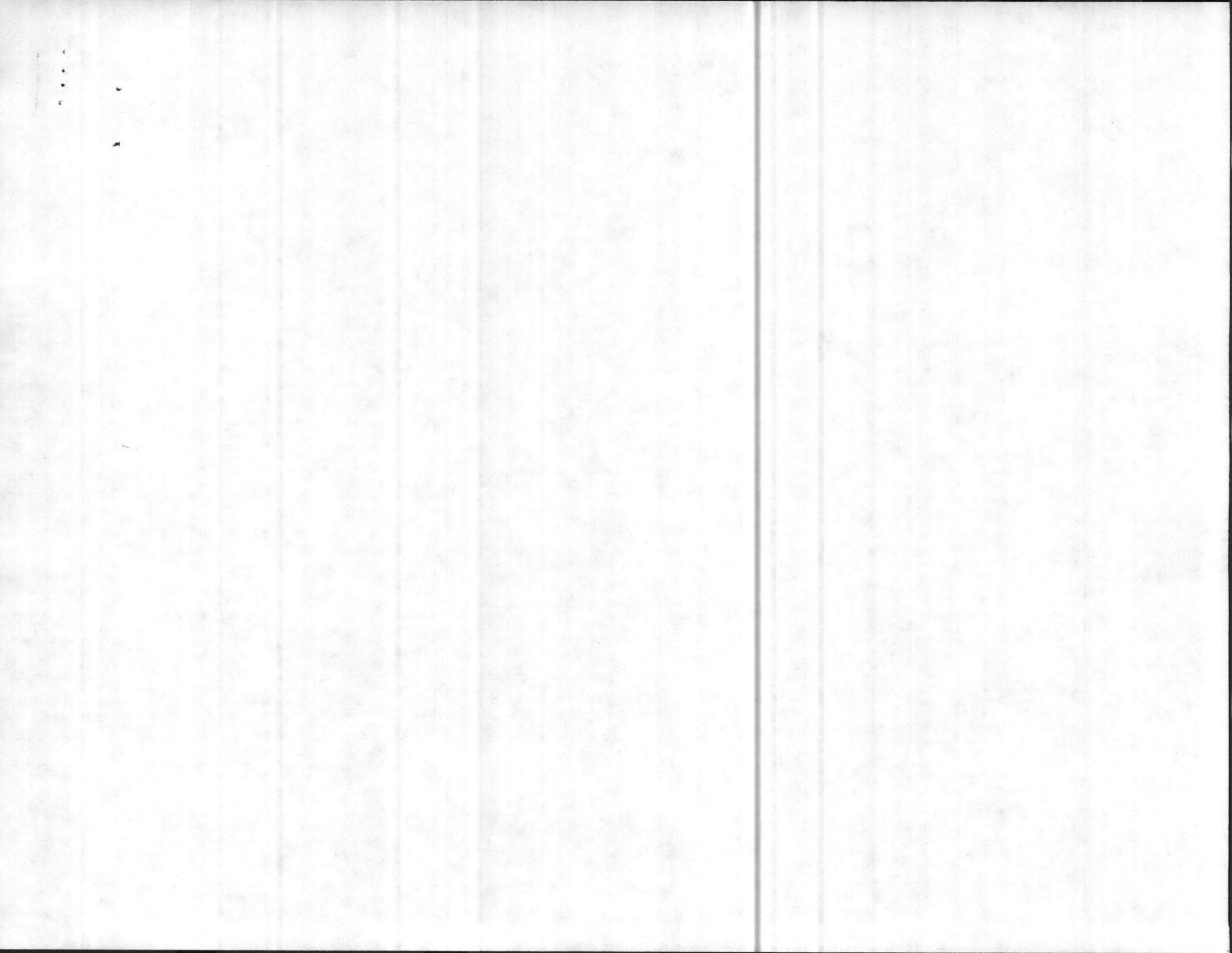
(5) Serves as a specialist on hazardous waste containerization and packaging; hazardous waste transportation regulations; and storage/warehousing of hazardous material/wastes.



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 &amp; REPAIR BRANCH</u>
Maintenance of oil-water separators, including cleaning and inspection.	1-Oil Collection/skimmer truck 2-Vac All trucks 2-Motor Vehicle Operators, WG-8 See note 1.	1. Assure 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 and 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. Assure responsibility.	1. None

Note 1: Requires purchase of an additional Vac All Truck.



6240  
NREAD  
23 Dec 87

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

Subj: WASTE OIL MANAGEMENT AND EQUIPMENT SUPPORT FOR FORESTRY/  
WILDLIFE

Encl: (1) Deputy AC/S, FAC memo of 7 Dec 87  
(2) Revised Action Brief

1. Enclosure (1) has been reviewed relative to both the Deputy, AC/S, Facilities, Action Brief and related Base Maintenance Officer, (BMO) comments. I concur with BMO comments that transfer of one billet will not support the actual needs of forestry and wildlife operations. Several man years are required for these operations and related soil conservation and wetlands protection. I recommend that heavy equipment functions remain within Base Maintenance Division.

2. Both the original action brief and related BMO comments, are much greater in scope than the AC/S, Facilities proposal. Changes involving maintenance of oil pollution abatement facilities and PCB transformer management are clearly Maintenance functions, requiring major support from almost all shops within Base Maintenance. There is some benefit from improving NREAD capabilities to respond to small spills, thereby eliminating coordination with and disruption of, Base Maintenance operations.

3. I non-concur with enclosure (1), and submit enclosure (2) for consideration.

J. I. WOOTEN

ENCLOSURE (2)



HEADQUARTERS, MARINE CORPS BASE  
CAMP LEJEUNE, NORTH CAROLINA

DATE 12-7-87

Deputy  
From: Assistant Chief of Staff, Facilities  
To: Natural Resources

Subj: Waste Oil Mgmt

Denny,

Attached is AC/Staff proposal  
to transfer subj. function. Bas.  
Maintenance counter proposal  
is also attached. Request  
review, comments/concurrence

Regards  
J. W. [Signature]

Enclosure (1)



# Memorandum

04 DEC 1987

6280  
MAIN

Base Maintenance Officer

Assistant Chief of Staff, Facilities

## WASTE OIL MANAGEMENT AND EQUIPMENT SUPPORT FOR FORESTRY/ WILDLIFE

- (1) Draft Action Brief
- (2) Proposed Enclosure to Draft Action Brief

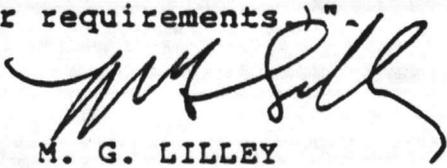
1. After discussing forestry and wildlife support with members of Base Maintenance, the following is offered:

a. Rarely does equipment support involve a single operator. Most support roles require more than one person.

b. Much of the support provided by Base Maintenance is seasonal. Accordingly, a single operator would be incapable of providing for NREAD's needs during periods of intense requirements. During the off season, the operator may be used in jobs requiring less than the WG-10 operator skill connotes. Accordingly, it is recommended that the transfer of one equipment operator and equipment for forestry and wildlife be held in abeyance. If you wish to pursue the transfer, however, Base Maintenance will support it.

2. The action brief can be changed to delete forestry and wildlife with minor surgery.

3. It is recommended that the enclosure to enclosure (1), proposed action brief, be replaced with enclosure (2), attached hereto. It is believed that everyone involved will be well-served by more definitive guidelines. The bracketed portion of the first recommendation should read "(see attached functions, assignments, and transfer requirements)".



M. G. LILLEY



HEADQUARTERS, MARINE CORPS BASE, CAMP LEJEUNE

ACTION BRIEF

Staff Section:

Date: NOV 20 1987

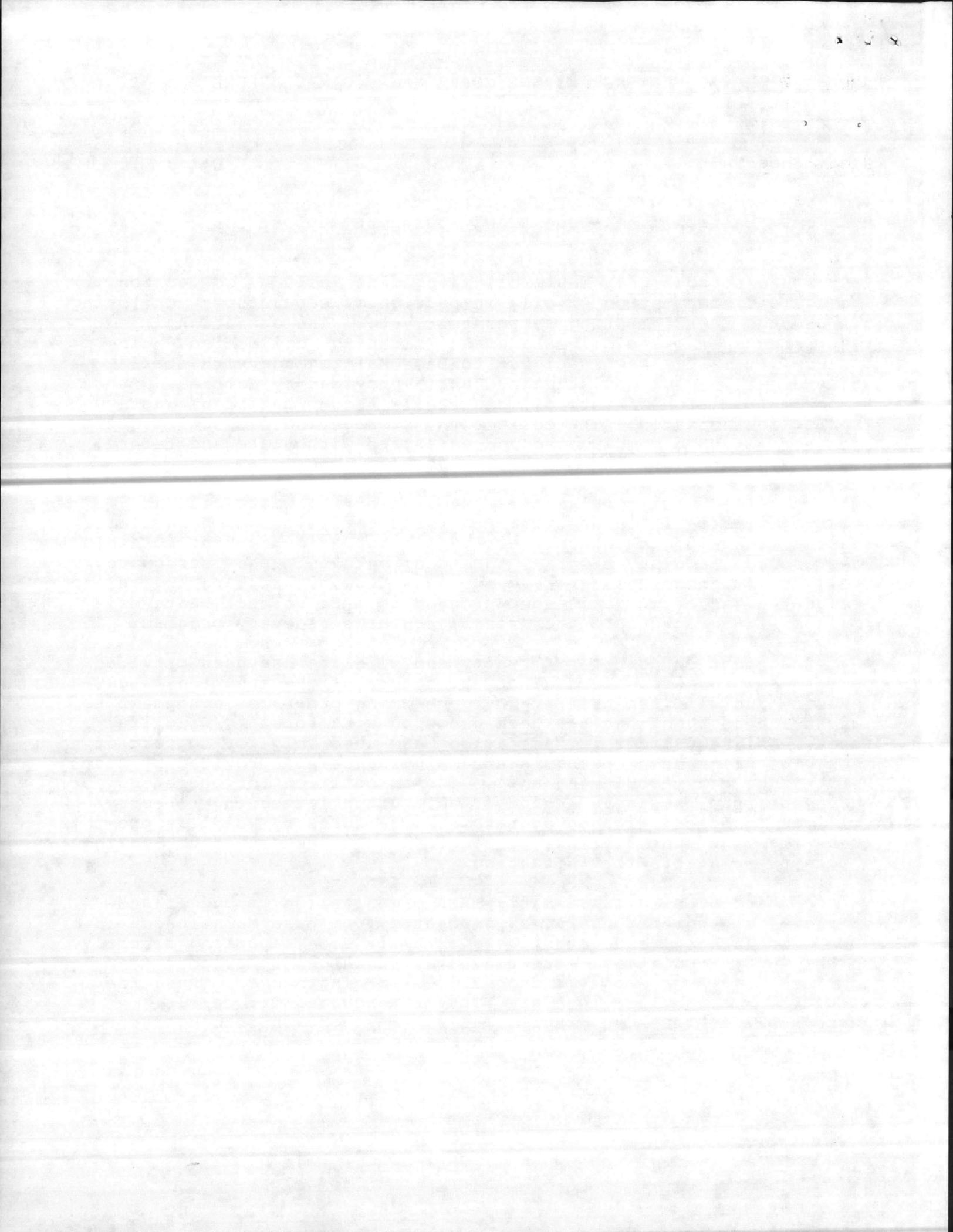
Problem: Waste oil management and equipment support for forestry/  
wildlife

Background/Discussion: Waste oil management includes collection, storage and disposition of oil; inspection of separators; monitoring oil storage tanks; testing for content; etc. The operational requirements of waste oil management (cleaning, collection, maintenance, etc.) has been assigned to Base Maintenance with staff assistance (inspections, testing, etc.) provided by Natural Resources Division. Waste oil can easily become hazardous waste when/if contaminated. The collection, storage and disposal process then becomes more complicated and entangled with state and federal regulations and laws.

Because of the complexities associated with waste oil and hazardous waste, it is desirable that the entire function be placed under a single organizational entity to the maximum extent possible. The resource recovery program, including metals, paper, cardboard, etc., is assigned to Natural Resources. Thus, it appears logical to assign the waste oil management program to NREA so that waste oil could be integrated into the overall resource recovery program.

Equipment support for forestry and wildlife has been provided by Base Maintenance. Because of the nature of the function; e.g., forestry and wildlife are revenue generating programs, equipment to support these functions has been procured with forestry/wildlife funds. This equipment is "set aside" and used only for support of these two programs. Operators and maintenance are provided by Base Maintenance heavy equipment unit. The competition for operators for equipment from the heavy equipment unit often leaves the forestry/wildlife equipment without operators. The forestry/wildlife programs are time sensitive due to seasonal requirements, thus, making a less than satisfactory situation.

A third problem area in the NREA organization is budget and financial management. NREA was separated from Base Maintenance in approximately 1981 and established as a division reporting directly to the AC/S, Facilities. The financial resources to support NREA remained with Fund Administrator 23, Base Maintenance. Thus, the situation was (and is) that the Natural Resources Officer is responsible to the AC/S, Facilities but must obtain funding through a peer organization.



Subj: WASTE OIL MANAGEMENT AND FORESTRY/WILDLIFE HEAVY EQUIPMENT SUPPORT

Recommended Action:

1. Transfer waste oil management to Natural Resources (see attached for functions included).
2. Transfer forestry/wildlife equipment operators to Natural Resources (see attached for functions included).
3. Create a separate fund administrator for Natural Resources with total financial management responsibilities.

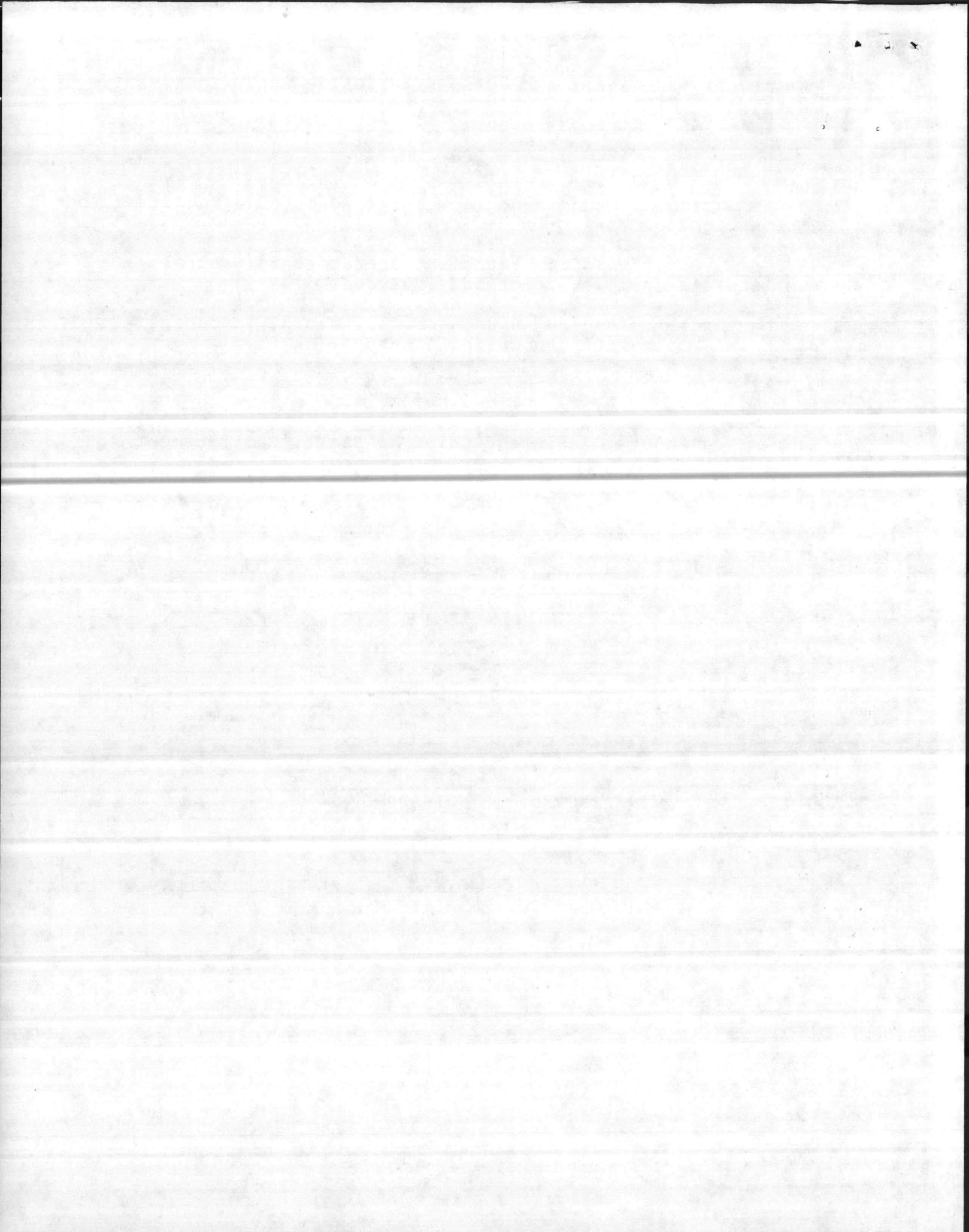


B. W. ELSTON

Deputy, Assistant Chief of Staff, Facilities

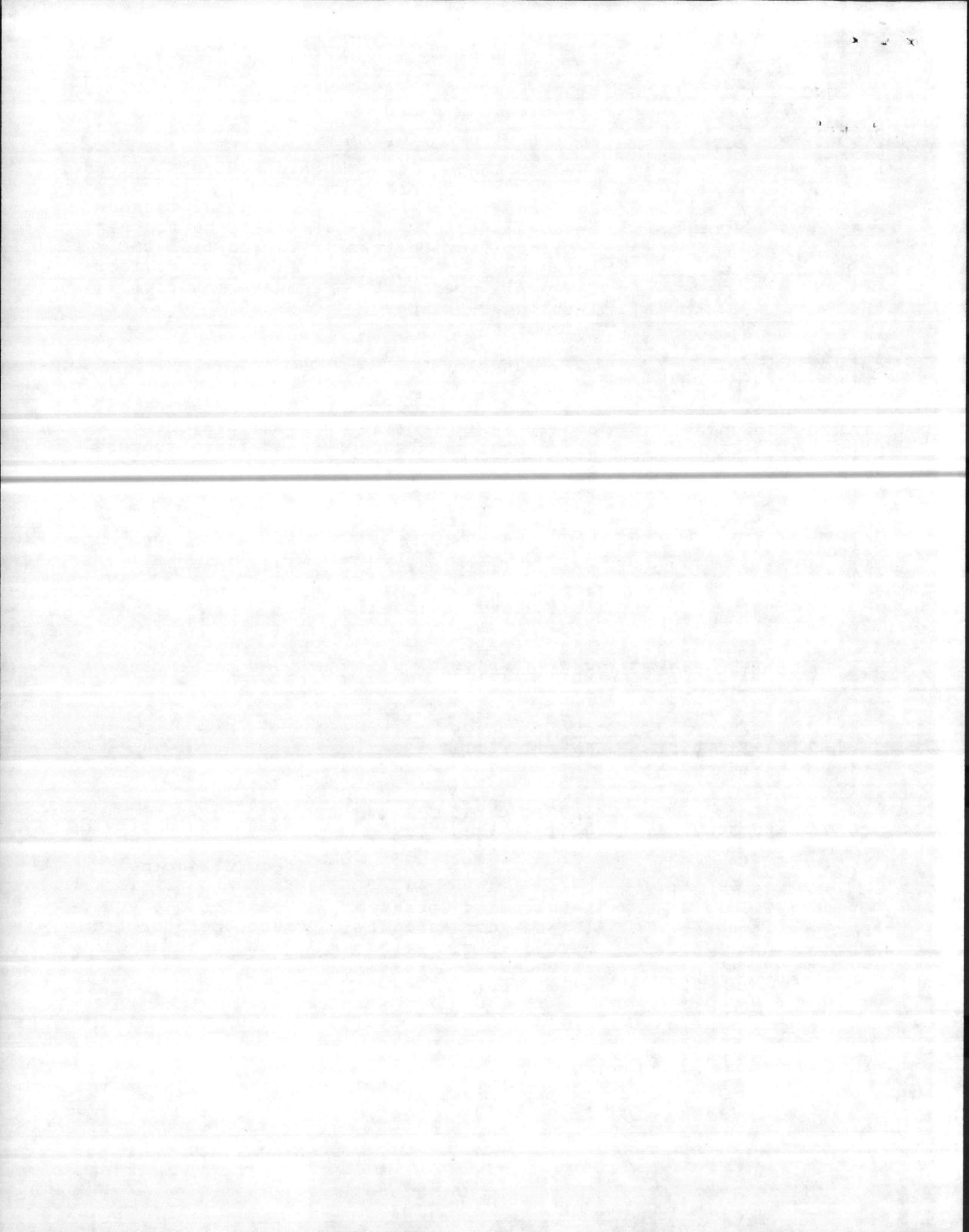
Recommendation:

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



TRANSFER OF WASTE OIL MANAGEMENT  
FROM BMO TO NREAD

<u>FUNCTIONS</u>	<u>RESOURCES</u>	<u>COMMENTS/RECOMMENDATIONS</u>
Waste oil collection, storage & disposition	Equipment: 1-Vac-All truck 3-oil collection trks Personnel: 2-Vac All operators 1-trk oper-Skimmer 1-laborer 1-Supv (must come from NREAD)	Equipment personnel to be transferred from BMO except supervisor must come from NREAD
Maintenance of separators, including skimming, cleaning and inspection	Included in resources above. Will require heavy equipment support on large separators, such as Boat Basin, Courthouse Bay	Base Maintenance will provide necessary support
Response to oil spills	Included in above except additional support would come from heavy equipment, etc.	NREAD would assume lead role
Monitor oil storage tanks and monitoring wells	No additional	
Burns pits for firefighter training -- collect run off	No additional	
PCB Transformer Program	No additional	NREAD would provide management and record keeping
Forestry/Wildlife heavy equipment support	1-Equipment Operator (FY-87 Records indicate 1.15 man years expended in forestry/wildlife)	Transfer one equipment operator from Base Maintenance



<u>FUNCTIONS</u>	<u>RESOURCES</u>	<u>COMMENTS/RECOMMENDATIONS</u>
Parking/storage of vehicles and equipment	Heavy equipment lot and parking lot between bldgs. 1102 and 1103	Utilize parking facilities at heavy equipment to continue parking low beds/dozers. Assign lot between 1102/1103 to NREA.
Space for personnel/shop area	Bldg. 1103 and 1102	Assign bldgs. 1102 and 1103 to NREA.
Budgeting/financial management	1-Budget Clerk	Transfer a billet from Base Maintenance

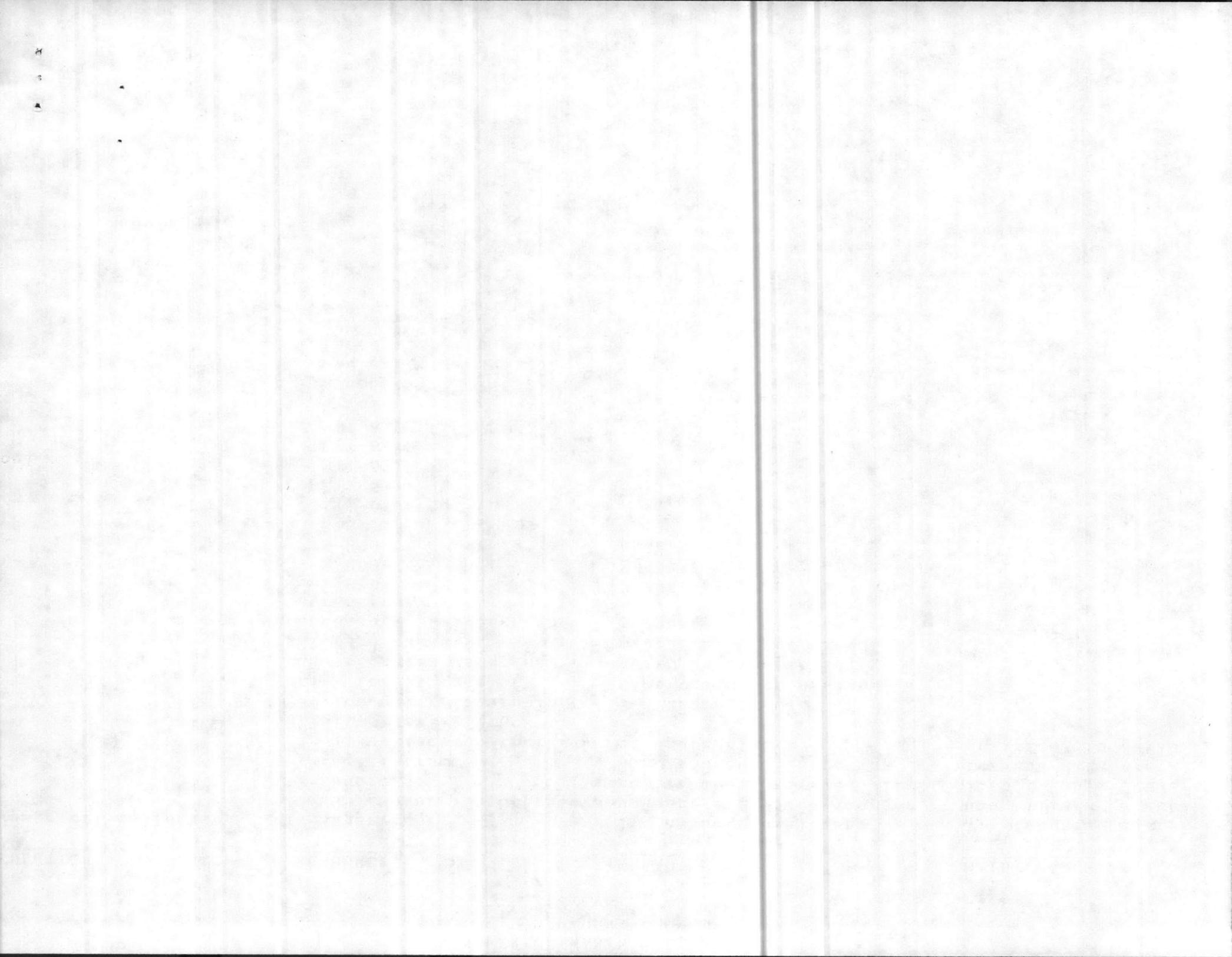


*BMO  
Response*

TRANSFER OF WASTE OIL MANAGEMENT  
FROM BMO TO NREAD

<u>FUNCTION</u>	<u>RESOURCES</u>	<u>NREAD</u>	<u>MAINTENANCE</u>
Waste oil collection	1-Supervisor 3-WG-7 Motor Veh Operators 2-Laborers 1-VacAll truck 2-Oil collection trucks 1-Oil skimming truck 1-1200 gal relocatable tank for storage of questionable material Storage tanks, accessory buildings and structures: S-888 S-889 S-890 S-891 STT-61 STT-62 STT-63 STT-64 STT-65 S-781 Accessory buildings and structures associated with the above storage tanks	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 inhouse assets.	1. Transfer equipment and billets to establish 3 Vehicle Operator and 2 Laborer positions to NREAD.
Maintenance of oil-water separators, including skimming, cleaning and inspection.	2-Oil skimmers 1-Air pump	1. Assume operational support of all oil-water separators to include skimming, cleaning and inspection.  2. Request assistance from BMaint for heavy equipment support on large separators such as Boat Basin, Courthouse Bay.	1. Transfer equipment  2. Provide heavy equipment support as requested.

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FUNCTIONRESOURCESNREADMAINTENANCE

Oil and hazardous material spill response

Preloaded trailer loaded with 500 ft. of floating boom, matting, pom pom, hand tools, drums for hazardous material, absorbent, etc.

1. Provide first response for containment and clean-up of spills.

1. Provide assistance as requested.

Administration of monitoring well program.

No additional

1. Assume responsibility.

1. None.

Servicing containment basins at Fire Protection Division burn pits used for fire fighter training

No additional

1. Assume responsibility.

1. None.

Monitoring and disposing of PBC transformers

Dedicated area in Lot 140

1. Maintain inventory of all PBC transformers in use at CLNC.

1. Assign dedicated area in Lot 140 to NREAD for temporary storage of PBC transformers awaiting disposal.

2. Assume custody of PBC transformers from Base Maintenance or from contractors that are taken out of service.

2. Notify NREAD of any change of "in use" PBC transformers or PBC transformers held by Base Maintenance.

3. Dispose of PBC transformers that are no longer required at CLNC.

H  
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A

FUNCTION

RESOURCES

NREAD

MAINTENANCE

Office Space

All of Bldg 1103 not assigned to Special Services

1. Assume custody of Bldg 1103.

1. Assist with re-assignment of Bldg 1103

2. Request AC/S, Comptroller to transfer Bldg 1103 to NREAD.

2. Move Plumbing Shop to Bldg 1102.

Budget/Financial

Budget Clerk

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

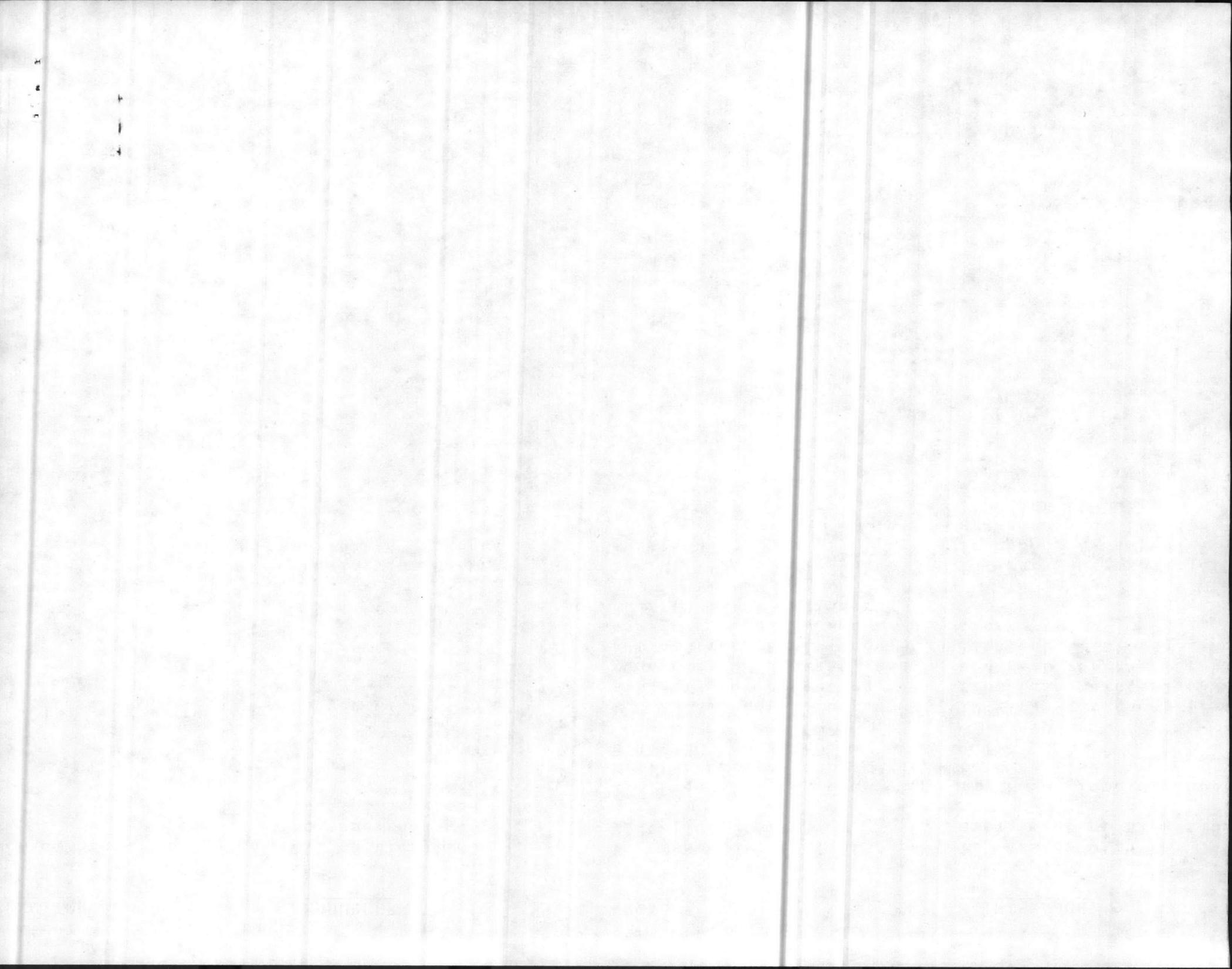
1. Transfer one billet from Base Maintenance to NREAD for the establishment of a budget clerk.

Vehicle Parking

Parking lot between Buildings 1102 and 1103.

1. Utilize parking now assigned.

1. Park only vehicles from Shop 61 and 62 in space between Building 1102 and 1103.



HEADQUARTERS, MARINE CORPS BASE, CAMP LEJEUNE

Action Brief

Staff Section: Natural Resources and Environmental Affairs Division

Date: 23 December 1987

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

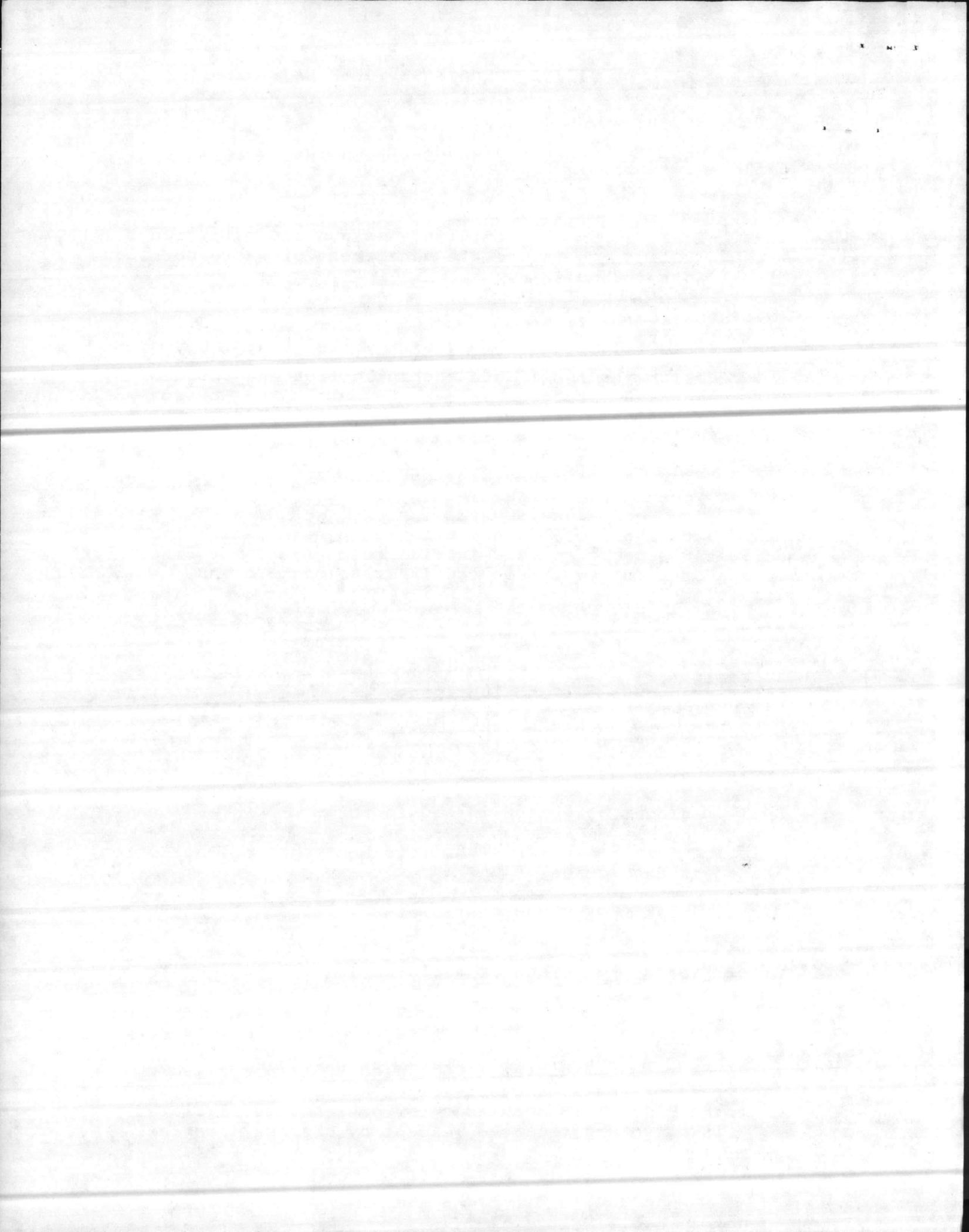
Background/Discussion:

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 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. Base Maintenance Officer has added several issues, including the cleaning and maintenance of oil pollution abatement facilities such as oil/water separators, and initial response to the Base Fire Chief requests for equipment and labor to contain and cleanup oil spills.

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
- 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.

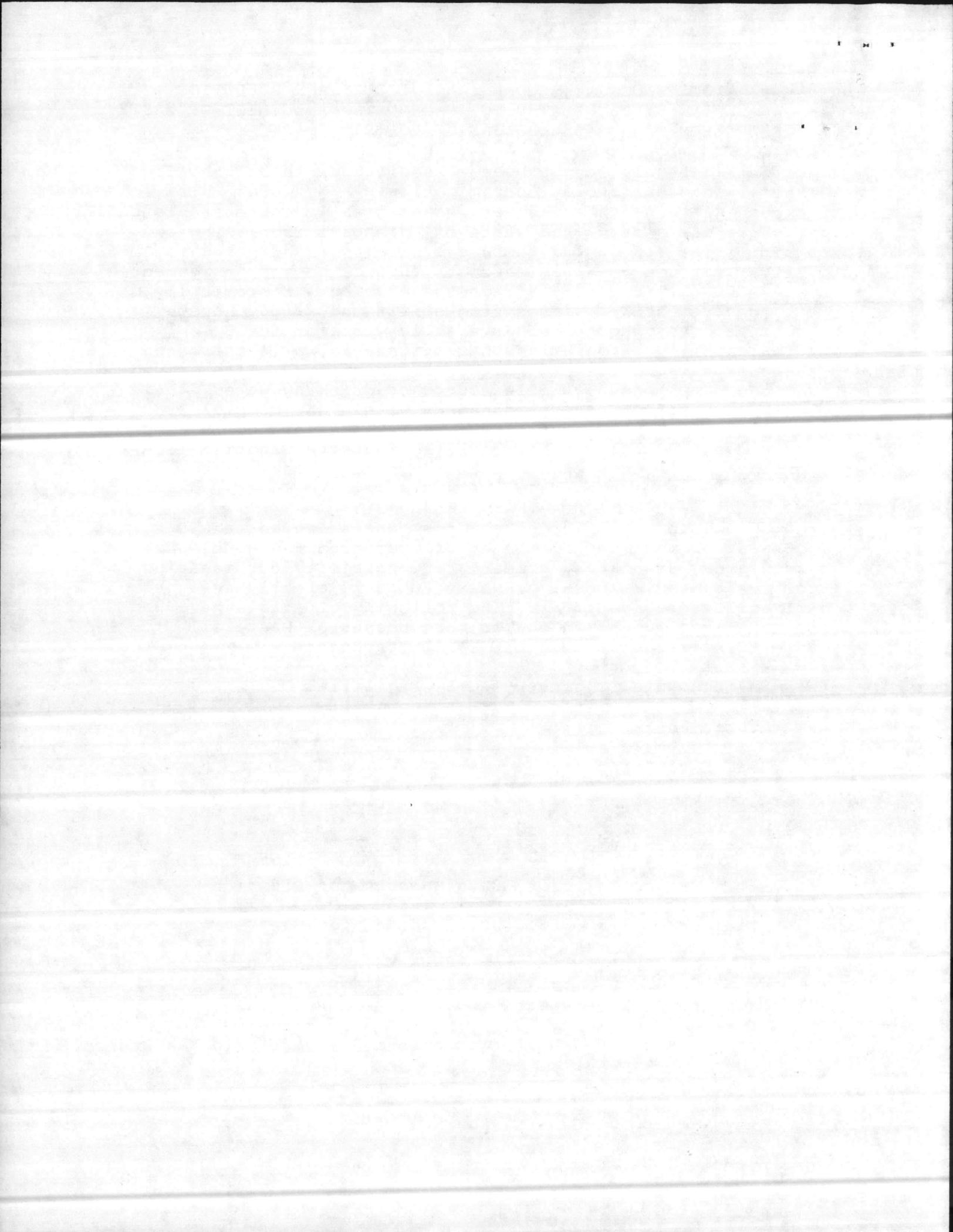


Subj: HAZARDOUS WASTE (HW) COMPLIANCE ISSUES AND POLLUTION  
ABATEMENT NEEDS RELATED TO INADEQUATE MANAGEMENT OF WASTE  
PETROLEUM OILS AND LUBRICANTS (POL'S)

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 ground-water 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



Subj: HAZARDOUS WASTE (HW) COMPLIANCE ISSUES AND POLLUTION  
ABATEMENT NEEDS RELATED TO INADEQUATE MANAGEMENT OF WASTE  
PETROLEUM OILS AND LUBRICANTS (POL'S)

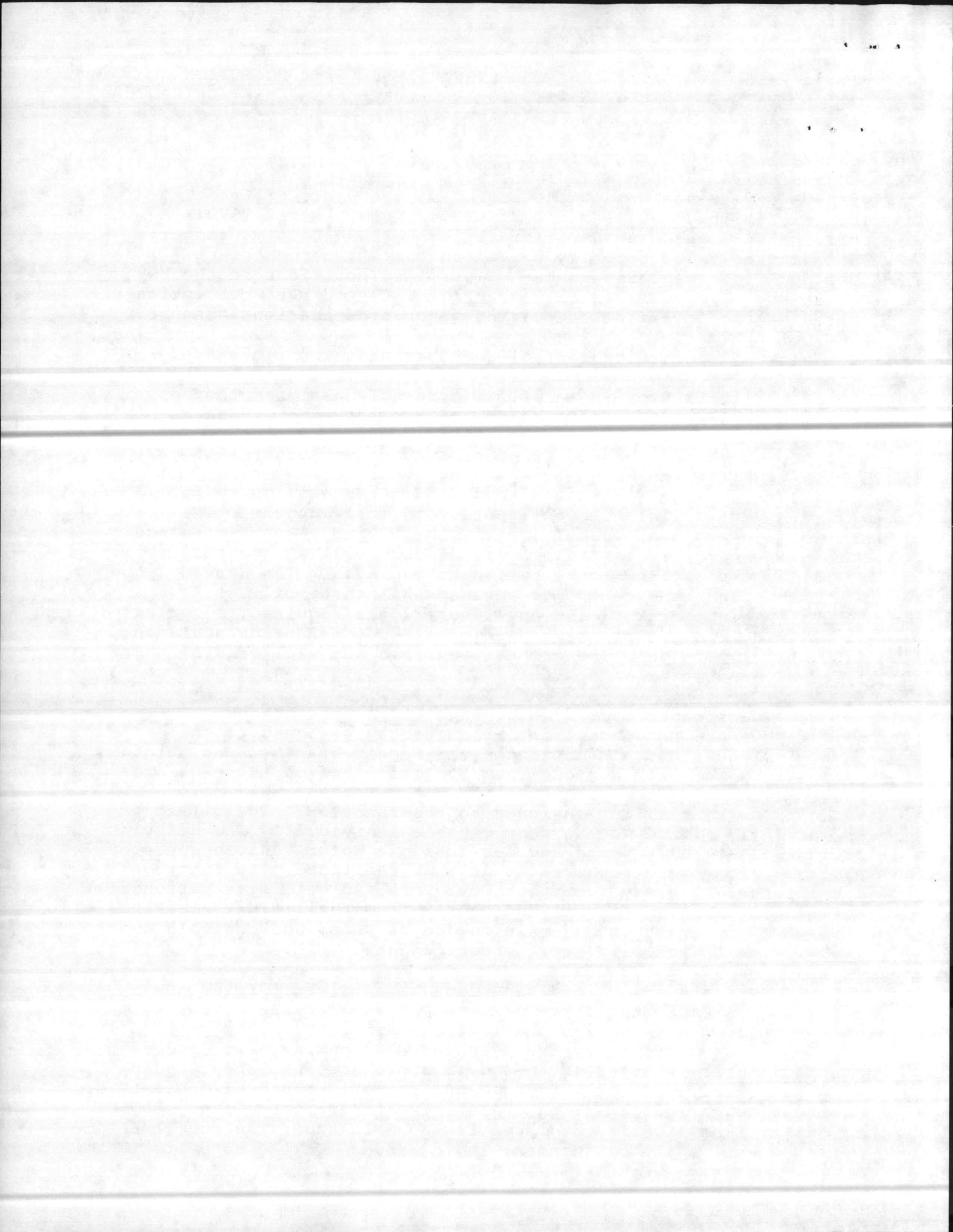
Reduction of the number of supervisors within the General Services Section of M&R Branch as a result of "streamlining" associated with CA review had a negative effect on the waste oil program. The program which has steadily improved from the mid 1970's through 1983, began to deteriorate in the 1984-85 time frame. 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 only one permanent billet assigned to the function. The position became vacant this past summer when the incumbent took another position in the 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. The function properly carried out will require major clerical input.

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 General Foreman advises that one Motor Vehicle operator and one laborer are required to do this function. The function is supported by Heavy Equipment Operators and Utilities personnel. 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. 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 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

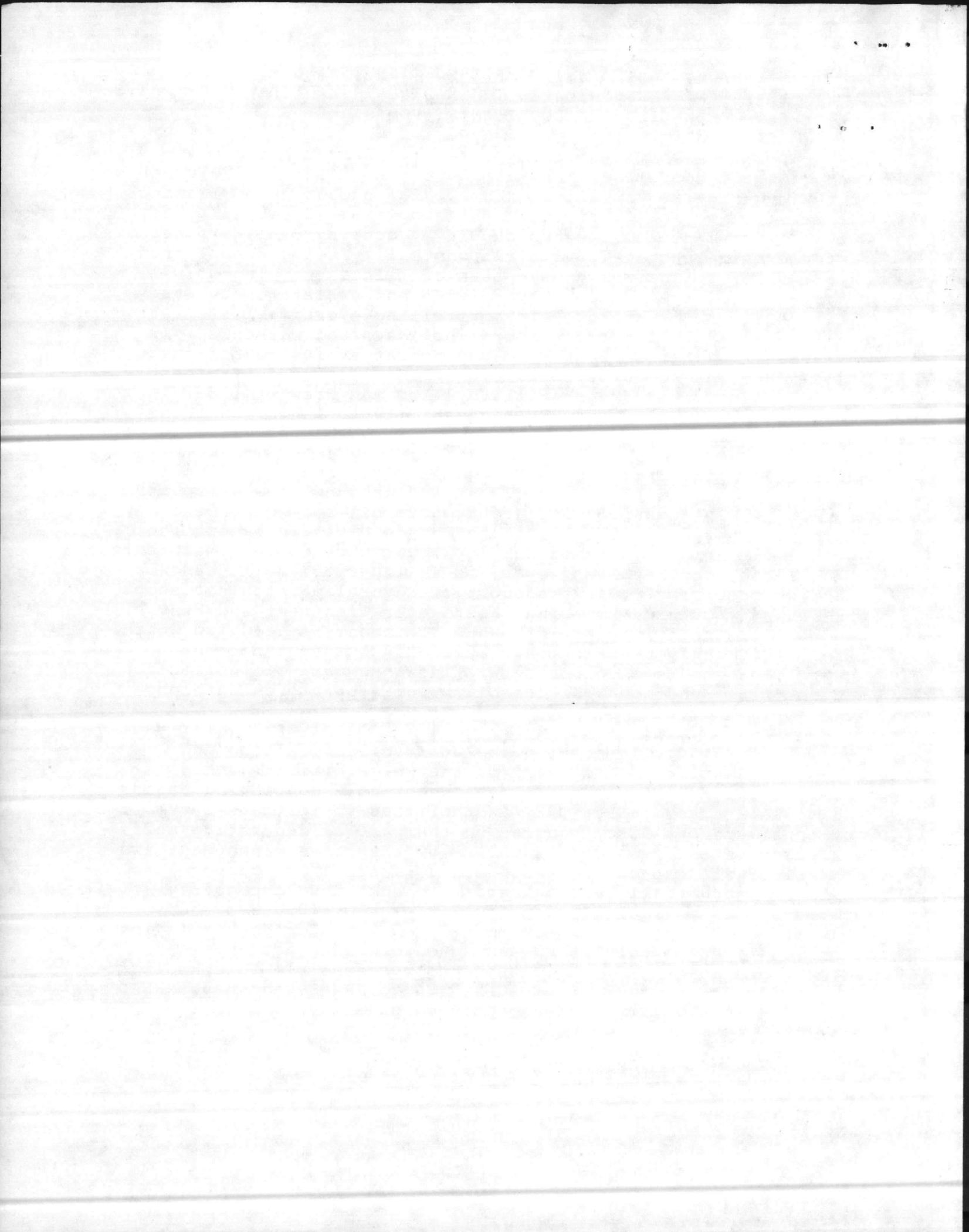


Subj: HAZARDOUS WASTE (HW) COMPLIANCE ISSUES AND POLLUTION  
ABATEMENT NEEDS RELATED TO INADEQUATE MANAGEMENT OF WASTE  
PETROLEUM OILS AND LUBRICANTS (POL'S)

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 Base Fire Department evaluation of the spill scene and scope of containment and clean-up determines how efficiently we handle spills. a two man crew will be required. This will give NREAD capability to handle HW transportation with TMO support.

5. 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 obvious flexibility offered due to larger work force. Maintenance of oil/water separators however, is an inherited 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 Base Maintenance functions. An argument can be made for separating the waste oil collection and disposal function from the oil/water separator maintenance function.

6. The advantages of placing the waste oil collection and disposal 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. 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 are obvious.



Subj: HAZARDOUS WASTE (HW) COMPLIANCE ISSUES AND POLLUTION  
ABATEMENT NEEDS RELATED TO INADEQUATE MANAGEMENT OF WASTE  
PETROLEUM OILS AND LUBRICANTS (POL'S)

The main disadvantage to transferring the responsibility for collection of waste oil 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 other 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).



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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)).

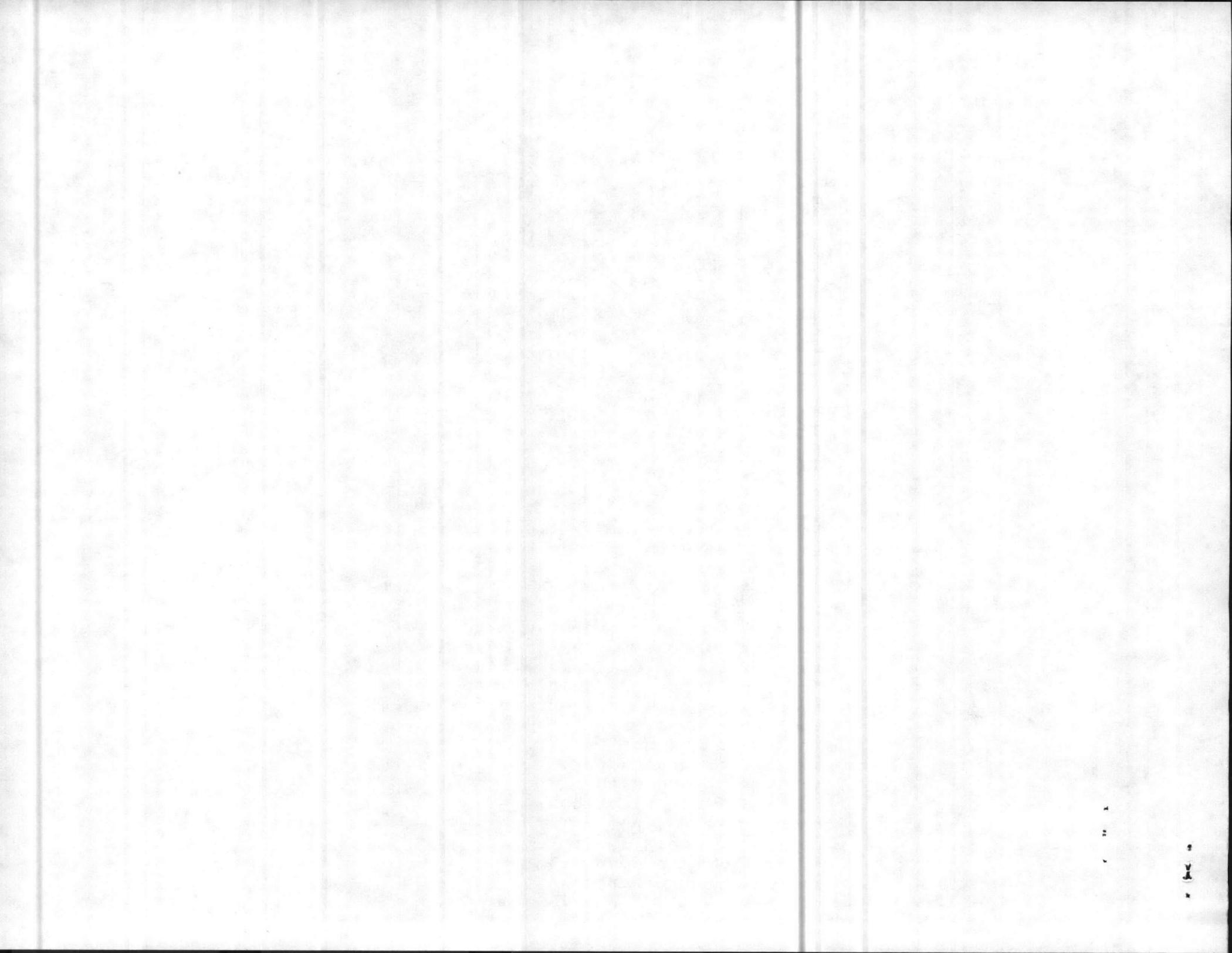
J. I. WOOTEN  
 Director, Natural Resources Division

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



TRANSFER OF WASTE OIL MANAGEMENT FROM BMO TO NREAD

<u>FUNCTION</u>	<u>RESOURCES</u>	<u>NREAD</u>	<u>MAINTENANCE</u>
Waste oil collection, transportation and disposal. Hazardous waste transportation oil spill response	<p>1-Supervisor                      1-Clerk                      3-WG-7 Motor Vehicle Operators/HAZMAT Handlers                      2-HAZMAT Handlers                      3-Waste Oil Collection trucks                      1-Stake Body truck                      1-4 wheel drive pickup                      1-Forklift/trailer                      Following tanks:                          S-888                          S-889                          S-890                          S-891                      Accessory bldgs and structures associated with the above storage tanks.</p> <p>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 pom, hand tools, drums for hazardous material, absorbent etc.</p>	<p>1. Assume total management and execution for collection, storage, disposal and administration of waste oil.</p> <p>2. Request AC/S, Comptroller to assign NREAD as Program Administrator for Class II Property.</p> <p>3. Assign Program Supervisor from in-house assets.</p> <p>4. Provide first response for containment &amp; cleanup of spills requests from Base Fire Deptment.</p> <p>5. Request assistance for heavy equipment or labor for spills beyond own capability from Base Maintenance via on-scene commander</p>	<p>1. Transfer equipment and billets to establish 3 vehicle operators, 2 HAZMAT and 1 clerk position in NREAD.</p> <p>2. Provide spill response assistance as requested by on-scene Commander (i.e. Base Fire Chief Representative)</p>



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 & desig-  
nated portion of  
1102.

2. Request AC/S,  
Comptroller to  
transfer Bldg. 1102

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.

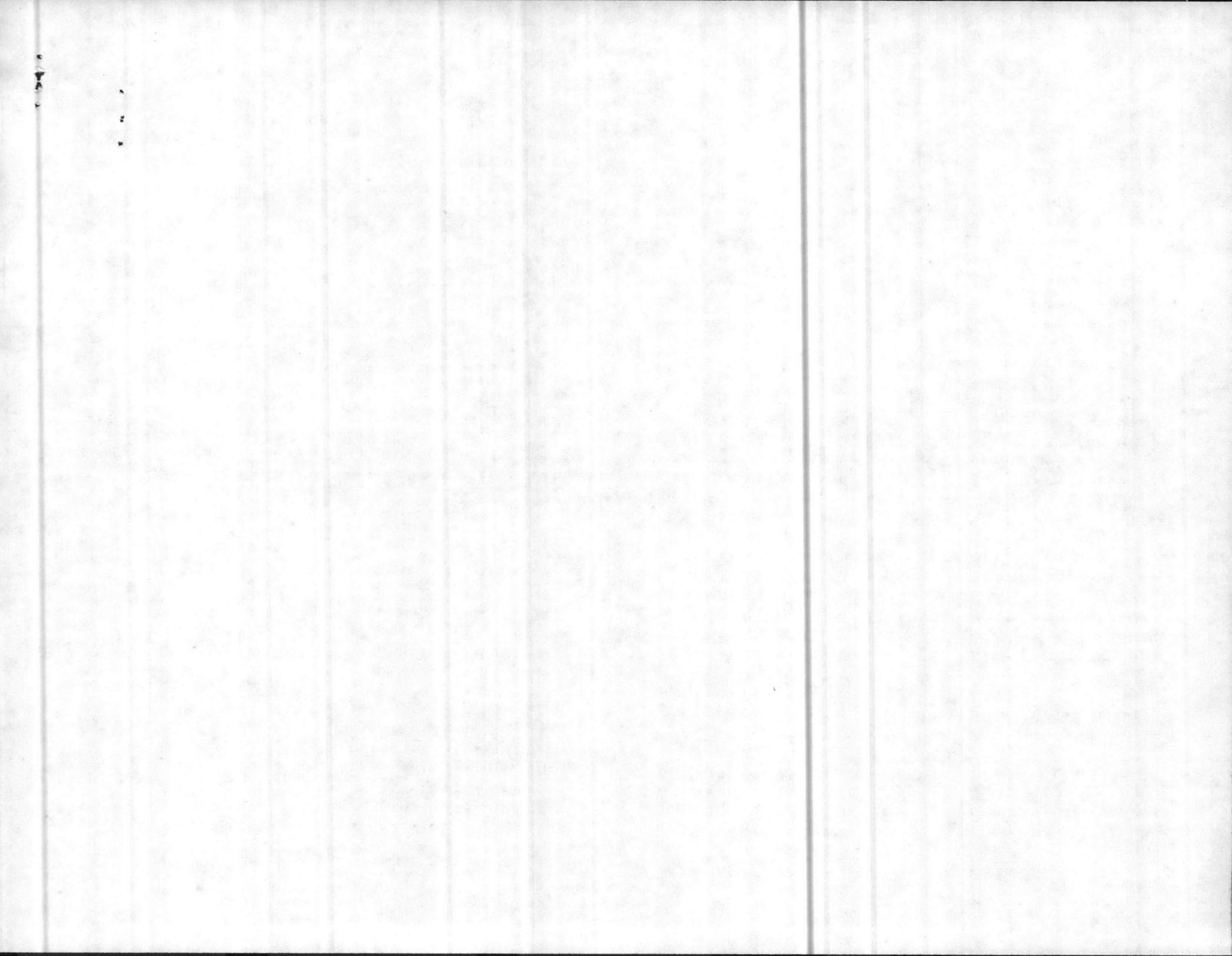
1. Transfer one  
billet from Base  
Maintenance to  
NREAD for the  
establishment  
of a budget  
Clerk.

VEHICLE PARKING

Parking lot between  
buildings 1102 and  
1103.

1. Utilize parking  
space adjacent to  
portions of buildings  
1102 & 1103 assigned  
to NREAD.

1. Park only  
vehicles from  
Shop 61 and 62 in  
space between  
buildings 1102 &  
1103 adjacent  
to portions of  
building 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 &amp; REPAIR BRANCH</u>
Maintenance of oil-water separators, including cleaning and inspection.	1-Vac All truck 1-Motor vehicle operator 1-Laborer	<ol style="list-style-type: none"> <li>1. Assume operational support of all oil-water separators to include cleaning &amp; inspection.</li> <li>2. Request assistance from M&amp;R Branch for heavy equipment support on large separators such as Boat Basin and Courthouse Bay.</li> </ol>	<ol style="list-style-type: none"> <li>1. Transfer equipment and two billets.</li> <li>2. Provide heavy equipment support as requested.</li> </ol>
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.	<ol style="list-style-type: none"> <li>1. Coordination with Base Environmental Staff.</li> <li>2. Maintain inventory of all PCB transformers in use at CLNC.</li> <li>3. Assume custody of PCB transformers from Base Maintenance or from contractors that are taken out of service.</li> <li>4. Dispose of PCB transformers that are no longer</li> </ol>	<ol style="list-style-type: none"> <li>1. Assign dedicated area in Lot 140 to Utilities for temporary storage of PCB transformers awaiting disposal.</li> <li>2. Assist in spill response.</li> </ol>



*Memorandum*

6280

FAC

JAN 27 1988

Assistant Chief of Staff, Facilities

Base Maintenance Officer

Director, Natural Resources and Environmental Affairs Division

Assistant Chief of Staff, Comptroller

## WASTE OIL MANAGEMENT PROGRAM

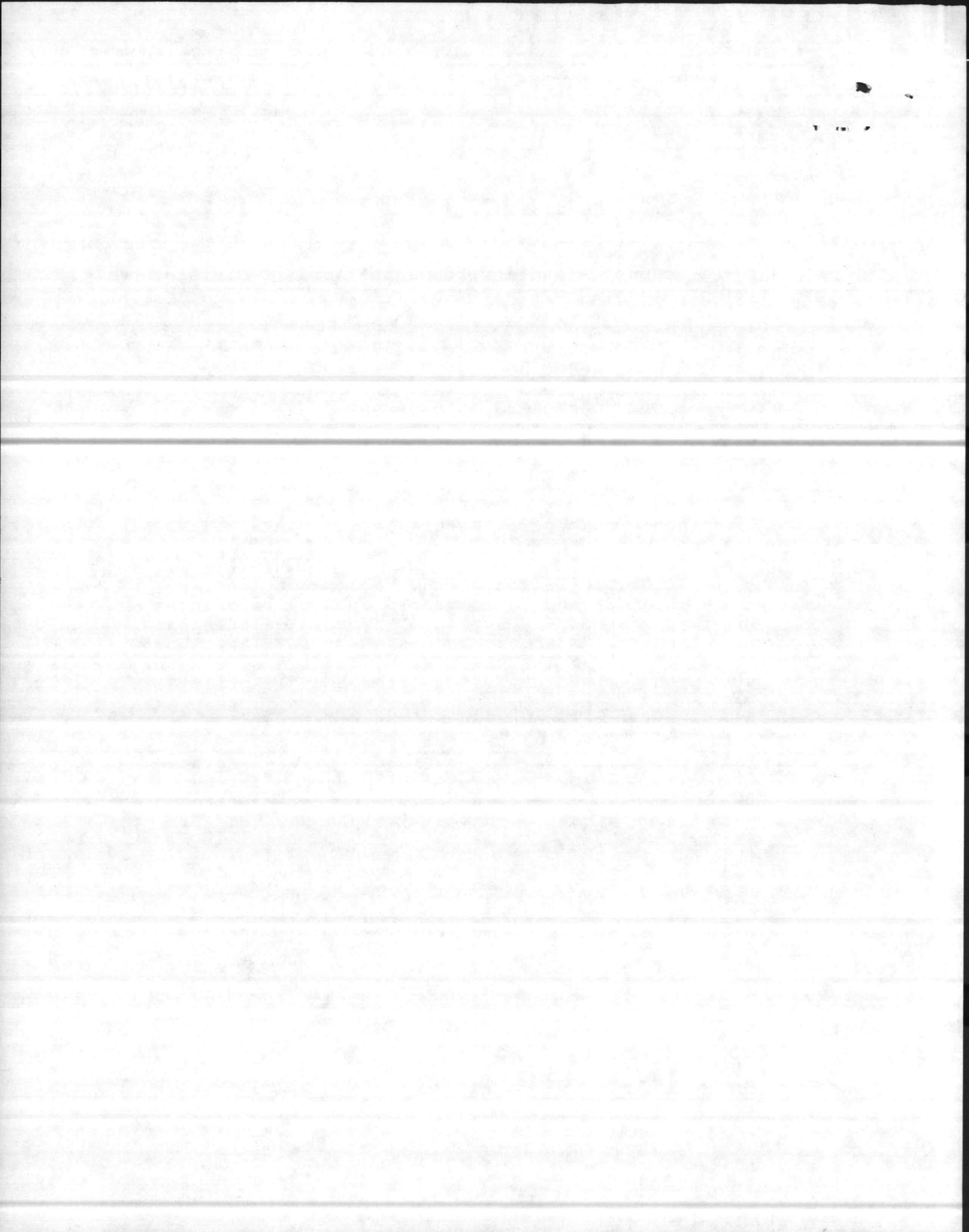
- (a) Deputy AC/S Fac memo dtd 7 Dec 1987
- (b) BMO memo 6280 MAIN dtd 4 Dec 1987
- (c) Dir, NREAD memo 6240 NREAD dtd 23 Dec 1987

## (1) Functions, Responsibilities and Assignments

1. Reference (a) staffed a proposal to transfer the subject function from Base Maintenance to NREAD. Reference (b) contained Base Maintenance comments. Reference (c) contained NREAD comments.
2. Enclosure (1) is a compilation of the recommendations forwarded in reference (a) and as commented upon by references (b) and (c) and is forwarded for action. The Base Maintenance Officer and the Director, NREAD are requested to initiate appropriate actions to accomplish the transfer of functions, responsibilities and assignments effective no later than 1 April 1988.
3. The AC/S Comptroller is requested to establish NREAD as a separate fund administrator with total financial management responsibilities. A billet will be provided from Base Maintenance. The individual will be co-located with Base Maintenance for as long as required to effect an orderly transfer of responsibilities, establishment of procedures within NREAD, and for training.

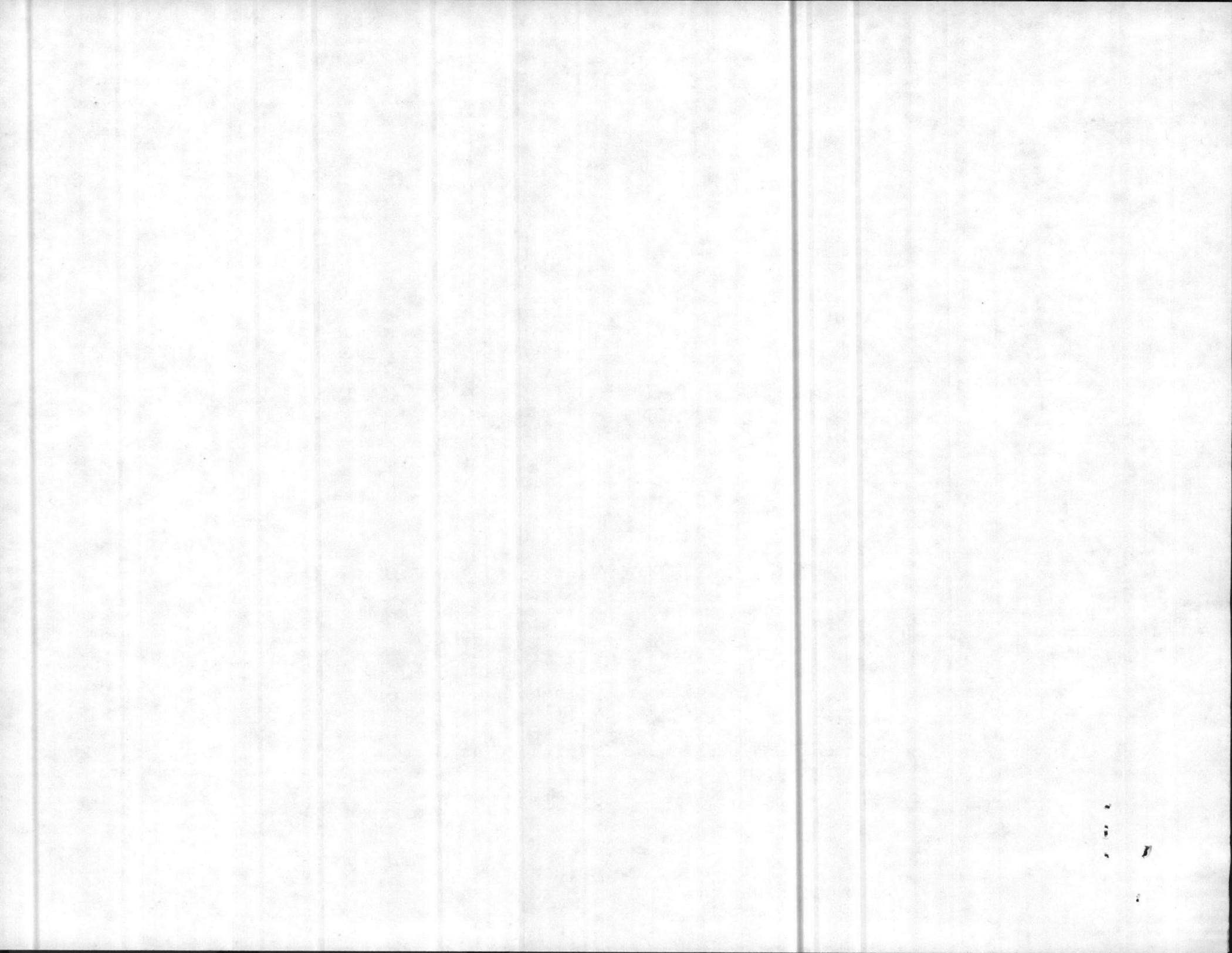
*T. J. Dalzell*  
T. J. DALZELL

ENCLOSURE (3)



TRANSFER OF WASTE OIL MANAGEMENT  
FROM BMO TO NREAD

<u>FUNCTION</u>	<u>RESOURCES</u>	<u>NREAD</u>	<u>MAINTENANCE</u>
Waste oil collection, transportation and disposal	1-Supervisor 3-WG-7 Motor Veh Operators 2-Laborers 1-VacAll truck 2-Oil collection trucks 1-Oil skimming truck 1-1200 gal relocatable tank for storage of questionable material Storage tanks, accessory buildings and structures: S-888 S-889 S-890 S-891 STT-61 STT-62 STT-63 STT-64 STT-65 S-781 Accessory buildings and structures associated with the above storage tanks	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 inhouse assets.  4. Develop procedures in conjunction with TMO to manifest and transport HW from generation sites to DRMO.	1. Transfer equipment and billets to establish 3 Vehicle Operator and 2 Laborer positions to NREAD.  2. Provide maintenance and equipment support as requested.  3. Transfer 1 Vehicle Operator billet to NREAD to support inhouse capability to transport HW internally.
Maintenance of oil-water separators, including skimming, cleaning and inspection.	2-Oil skimmers 1-Air pump .	1. Assume operation and maintenance support of all oil-water separators to include skimming, cleaning and inspection as outlined in BO 11090.3 (to be revised).	1. Transfer equipment.  2. Provide heavy equipment support as requested.



Monitoring and disposing of PBC transformers.

Dedicated area in Lot 140.

1. Maintain inventory of all PBC transformers in use at CLNC.

1. Assign dedicated area in Lot 140 to NREAD for temporary storage of PBC transformers awaiting disposal.

2. Assume custody of PBC transformers from Base Maintenance or from contractors that are taken out of service.

2. Notify NREAD of any change of "in use" PBC transformers held by Base Maintenance.

3. Dispose of PBC transformers that are no longer required at CLNC.

Office Space

All of Bldg 1103 not assigned to Special Services.

1. Assume custody of Bldg 1103.

1. Assist with reassignment of Bldg 1103.

2. Request AC/S, Comptroller to transfer Bldg 1103 to NREAD.

2. Move Plumbing Shop to Bldg 1102.

Budget/Financial

Budget Clerk

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

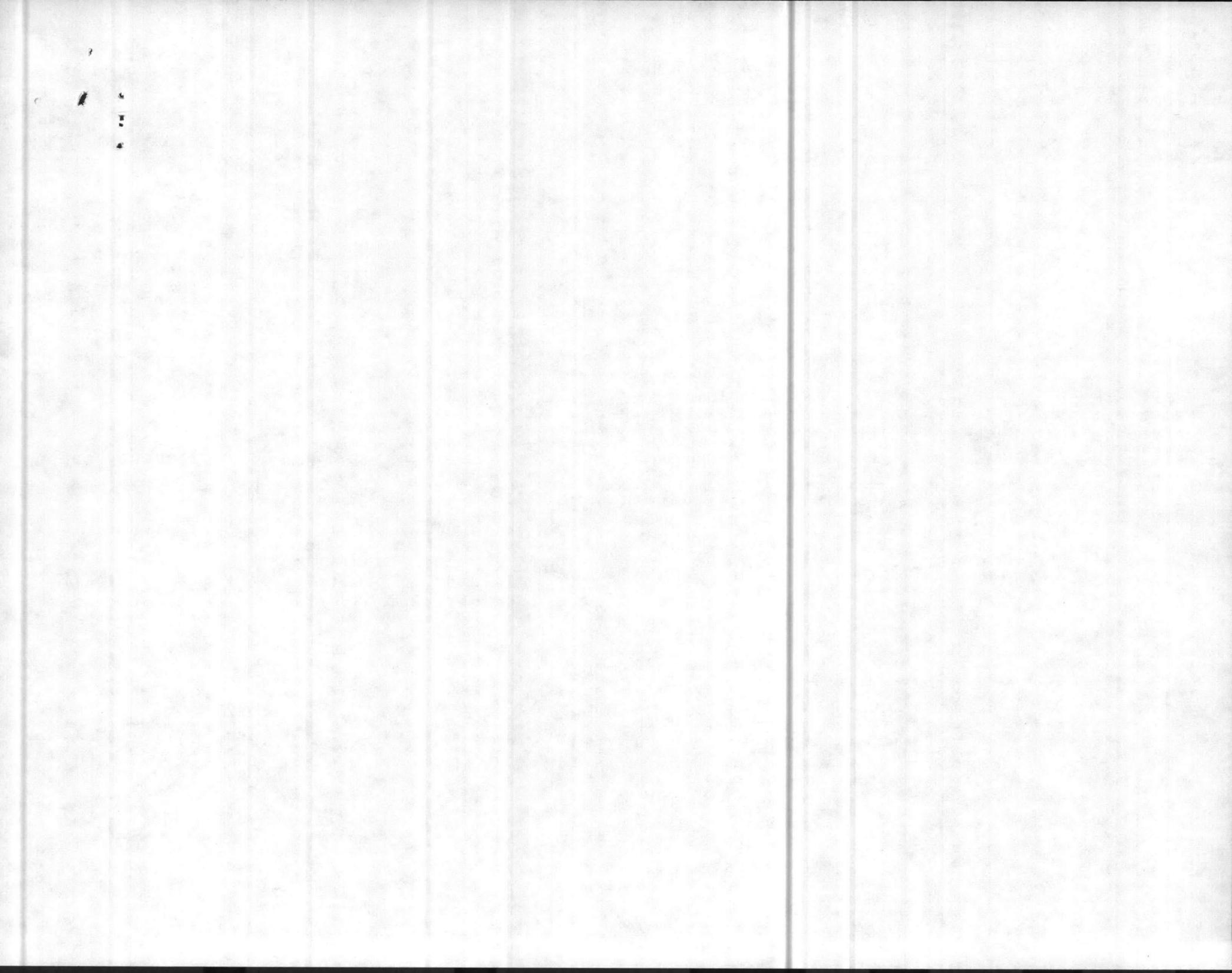
1. Transfer one billet from Base Maintenance to NREAD for the establishment of a budget clerk.

Vehicle Parking

Parking Lot between Buildings 1102 and 1103.

1. Utilize parking now assigned.

1. Park only vehicles from Shop 61 and 62 in space between Bldg 1102 and 1103.



MAINTENANCE

2. Request assistance from BMaint for heavy equipment support on large separators such as Boat Basin, Court-house Bay.

3. Provide maintenance support as requested.

3. Request assistance from BMaint to correct maintenance deficiencies.

1. Provide first response for containment and clean-up of spills requests from Base Fire Department.

1. Provide spill assistance as requested by on-scene commander (i.e., Base Fire Chief Representative)

2. Request assistance for heavy equipment or labor for spills beyond own capability from Base Maintenance via on-scene commander.

3. Maintain inventory of specialized spill response equipment and supplies included but not limited to preloaded trailer.

1. Assume responsibility

1. None.

1. Assume responsibility

1. None.

Preloaded trailer loaded with 500 ft. of floating boom, matting, pom pom, hand tools, drums for hazardous material, absorbent, etc.

No additional.

No additional.

Oil and hazardous material spill response.

Administration of monitoring well program.

Servicing containment basins at Fire Protection Division burn pits used for fire fighter training.

