



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

IN REPLY REFER TO
MAIN/DDS/th
6240
17 AUG 1981

From: Commanding General
To: Distribution List

Subj: Hazardous Material Disposal Program

Ref: (a) CG MCB msg 192111Z Nov 1980
(b) BO 11090.1B
(c) CG MCB ltr MAIN/DDS/th 6240 of 29 Jul 1980
(d) Resources Conservation and Recovery Act (RCRA)
(e) 49 CFR Parts 1, 71-173, 178 and 179
(f) 40 CFR Parts 260-265

Encl: (1) Hazardous Waste Label; instructions for use

1. The purpose of this letter is to provide additional guidance related to the implementation of the subject program initially established by reference (a). Reference (b) provides current installation policy related to prevention, containment, cleanup and reporting of accidental and other unauthorized spills or discharges of hazardous material and hazardous waste.

2. Monitoring of the subject program over the past eight months has identified the following Command concerns, which if not addressed immediately may result in violations of state and federal regulations:

a. Hazardous waste (particularly used solvents, degreasers, paint stripper and battery acid) is being generated in volumes much lower than indicated by data provided by addressees during a previous survey conducted, as requested by reference (c).

b. Many shops routinely generating regulated material have not been provided adequate storage containers nor handling equipment.

c. Many first line supervisory personnel are not aware of either the legal liabilities associated with or the procedures for disposal of regulated items. Addressees are reminded that both military and civilian personnel are subject to prosecution in federal and state court for violation of federal and state regulations implementing reference (d).

3. The Defense Property Disposal Officer (DPDO) has declared several chemicals listed in reference (d), which are commonly used as solvents, degreasers, thinners and paint strippers in local shops, to be hazardous waste immediately upon generation. Also, because DPDO has been unable to find a source for reuse or sale of used electrolyte, they have recently declared all used battery acid to be a hazardous waste immediately upon generation. It is expected that other substances will be similarly categorized in the future. Items described above must be managed, as hazardous waste in the following manner:

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- a. Collect and store in suitable containers (to which have been affixed properly executed hazardous waste labels, see enclosure (1)) until transported to long term storage or disposal site by Assistant Chief of Staff, Logistics, Marine Corps Base.
 - b. Do not store for over 90 days aboard the installation except at an Environmental Protection Agency and State authorized site currently operated by Assistant Chief of Staff, Logistics, Marine Corps Base.
 - c. Do not transport on public highways except as authorized by Assistant Chief of Staff, Logistics, Marine Corps Base. Transportation must be accompanied by a properly executed North Carolina Hazardous Waste Manifest signed by Assistant Chief of Staff, Logistics, Marine Corps Base or his designated representative.
 - d. Transport only in containers and vehicles meeting specifications, labeling and placarding requirements of references (e) and (f).
4. Supervisors and cognizant officers in charge of shops and other functions handling, storing and using hazardous material can normally ensure they have satisfied their responsibilities with regard to the subject program by complying with the following:
- a. Inform personnel of the nature of and special handling requirements of the various types of hazardous material routinely used.
 - b. Ensure that adequate supplies of containers and safety and handling equipment are readily available for use by all personnel.
 - c. Ensure that required hazardous waste labels (enclosure (1)) are filled out, dated and affixed to each container before it is used to store hazardous waste and that only containers having this label are used to store hazardous waste.
 - d. Ensure that forms DD-1348-1 are properly executed for all hazardous waste; and turned in to DPDO within 60 calendar days after accumulation start date on hazardous waste label; and
 - e. Routinely inspect all shops and locations where hazardous material and waste are stored, handled or used and take action to repair leaking containers and to correct any condition which may result in a discharge of waste to the environment.
5. In many cases DPDO will accept accountability for a hazardous material or waste, but not physical custody. When this occurs, the organization turning in the item(s) becomes a custodian for property belonging to DPDO. The organization has the responsibility for properly storing the items. Should any of the containers deteriorate so as to create a threat to the environment or personnel safety, the holding organization should immediately notify DPDO. Repacking of any items for which DPDO has accepted accountability is the responsibility of DPDO.

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6. Addressees are requested to inform personnel within their Commands of current procedures regarding the implementation of the subject program. Point of contact for questions is Mr. Danny Sharpe, Natural Resources and Environmental Affairs Branch, Base Maintenance Division, extensions 2083/5003.

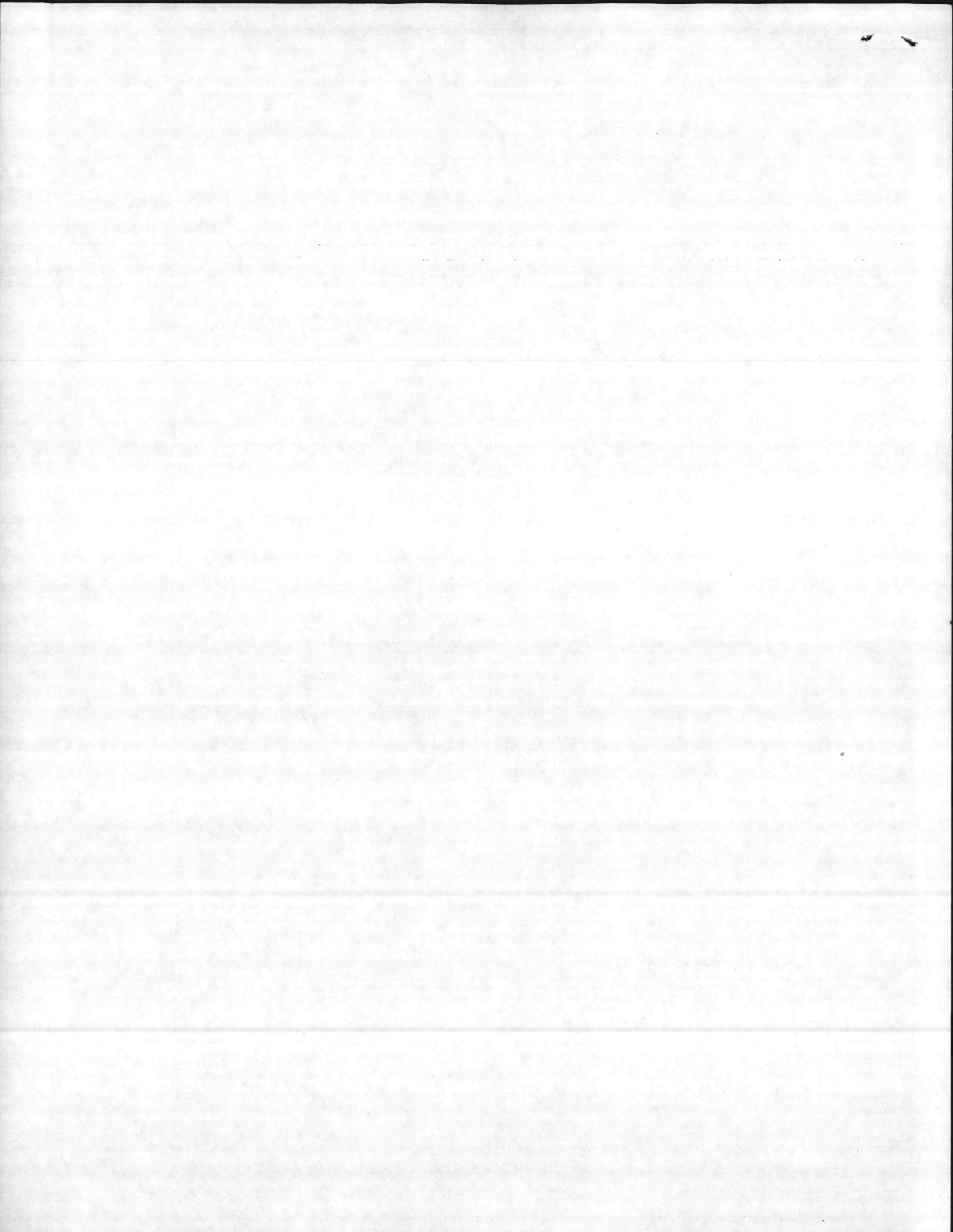
J. R. Fridell
J. R. FRIDELL
Chief of Staff

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PROPER D.O.T. SHIPPING NAME HAZARDOUS WASTE, LIQUID N.O.S. NA9189

ORM-E

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR
PUBLIC SAFETY AUTHORITY, OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME Marine Corps Base (2d FSSG, Building

ADDRESS 1601, Telephone No. - - - - -)

CITY Camp Lejeune STATE N.C. ZIP 28542

EPA ID NO. NC6170022580 EPA WASTE NO. _____

ACCUMULATION START DATE 1 June 1981 MANIFEST DOCUMENT NO. _____

HANDLE WITH CARE!
CONTAINS HAZARDOUS OR TOXIC WASTES

STYLE WM-10

- Note 1: Insert DOT shipping name and UN or NA# listed in 49 CFR Part 172 on Hazardous Waste Label, Style WM-6. If the item is not listed in 49 CFR Part 172, enter the name of the item preceded by the word "Waste". If the item is a mixture of various chemicals not readily identifiable by name, use Hazardous Waste Label Style WM-10, above.
- Note 2: Insert "Marine Corps Base" followed in parenthesis by the Name of the generating Command, if different, and the building number or location on board installation where waste is stored and the telephone number of responsible official (See example above).
- Note 3: Insert the date that container initially used to store waste. This date must be entered prior to use of container.
- Note 4: Leave blank. Will be completed by representative of PP&P after action to dispose of waste is initiated.
- Note 5: Hazardous Material Disposal Coordinator may obtain initial supply of labels from Base Maintenance Officer, telephone 5003. A locally produced label will be furnished at a future date by Marine Corps Base.