

MAIN/DDS/spk
6240
19 October 1981

Supervisory Ecologist

Director, Natural Resources and Environmental Affairs Branch

North Carolina Hazardous Waste Interim Status Inspection; record of

- Ref: (a) Visit to Camp Lejeune by Mr. Ray Church and Jerry Rhodes, Solid and Hazardous Waste Management Branch, NC Dept. of Health Services on 13 Oct 1981
(b) 40 CFR Parts 260-265
(c) BO 11350.2

(1) RCRA Inspection Summary of 13 Oct 1981

MCBCL msg 192111Z Nov 80

ESSG msg 202110Z Nov 80

ltr MAIN/DDS/th 6240 of 17 Aug 1981

msg 111437Z Sep 81

090.1B

B ltr FAC/JAM/jah 6280 of 25 Sep 1981

Analysis Plan of Oct 1981

Engineering Drawing of Proposed Upgrading of Bldg. TP-451

Enclosure (1) summarizes findings of State inspectors during reference inspection which was conducted to determine compliance with reference (b). The inspection team was provided copies of enclosures (1) - (8) which outline the State Hazardous Waste Management Program. The inspection team reviewed enclosure (9) but did not take a copy. A copy of reference (c) was also provided. A formal written report detailing findings summarized in enclosure (1) will be forwarded by the State to the Commanding General.

The purpose of this memorandum is to record information provided by the State inspectors and to make recommendations for action required to correct program discrepancies.

The inspectors appeared satisfied that the program outlined in enclosures (1) - (7) was adequate to achieve compliance with reference (b). Mr. [redacted] recommended paragraph 4a(5) of proposed BO 6240.5 be changed to clear-ly require weekly inspection and record keeping requirements of section 265.15(b)(1) of reference (b). While the inspectors did not so state, it is recommended that paragraphs 4c(6) and 4f(6) specify that requirements of reference (b) be followed.

Hazardous Waste Storage Facility at Bldg. TP-451. The discrepancies (non-compliance) identified in items 2, 3, 4, 5 and 7 on enclosure (1) for the most part arose during inspection of Bldg. TP-451 and records kept by the Logistics. Inspectors questioned why there was only one barrel of

1950
10 October 1950

Superintending Engineer

Director, Government of India, New Delhi

Reference is made to the letter of the Director, Government of India, New Delhi, dated 10.10.50, regarding the above subject.

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(1) The Director, Government of India, New Delhi, is requested to forward the following information to the Director, Government of India, New Delhi, for his information and for the use of the Director, Government of India, New Delhi, in connection with the above subject.

(2) The Director, Government of India, New Delhi, is requested to forward the following information to the Director, Government of India, New Delhi, for his information and for the use of the Director, Government of India, New Delhi, in connection with the above subject.

(3) The Director, Government of India, New Delhi, is requested to forward the following information to the Director, Government of India, New Delhi, for his information and for the use of the Director, Government of India, New Delhi, in connection with the above subject.

(4) The Director, Government of India, New Delhi, is requested to forward the following information to the Director, Government of India, New Delhi, for his information and for the use of the Director, Government of India, New Delhi, in connection with the above subject.

wastes in/at TP-451. It should be noted that this question was brought up by Mr. Rhodes several times. Mr. Rhodes became particularly concerned about this point when inspection of buildings 1502, FC-100 and FC-200 indicated that battery acids and solvents were being generated, but with one exception, no wastes were observed. Other concerns were as follows:

- a. That no specific person/officer appeared to be in charge of daily operation of the storage facility.
- b. Inadequacy of training records, contingency plans, and other records/documentation.
- c. Barrels in woods adjacent to TP-451.
- d. That the long term storage facility, in fact, was not in operation.
- e. Lack of inspection program.

In general, it is the opinion of the Supervisory Ecologist that had the inspection team found the existing Bldg. TP-451 in operation following guidelines in Section 265 of reference (b) with curbing shown in enclosure (9) that no major non-compliance items would have been identified attributable to Marine Corps Base organization/personnel.

5. Hazardous Waste Transportation. The inspection team appeared satisfied that PP&P and TMO had the capability to transport hazardous wastes as required by reference (b) and related DOT regulations. Mr. Rhodes raised the point that it was difficult to inspect transportation aspects when there had been no wastes transported. The one manifest on hand at TMO was not signed (a non-compliance item) by representative of storer. It should be noted that at the time the barrel in TP-451 was transported that responsibility for long-term storage had not been clearly assigned. Mr. Rhodes recommended that personnel to provide transportation of hazardous wastes be identified (designated), and that related training and training records be developed. The TMO transportation record keeping system did not meet all requirements of reference (b).

6. Generating Shops. Deficiencies identified during tour of buildings 1502, FC-100 and FC-200 were basically the same as those addressed by NREAB in enclosure (4). These were as follows:

- a. Routine inspections of storage areas for waste containers were not being conducted and logged weekly in accordance with Sections 265.15 and 265.174 of reference (b).
- b. The quantity of used barrels sitting around the shop areas which were not closed and which contained unknown liquids.
- c. Inadequate containers, lack of HW labels, or improperly completed labels.
- d. The spillage of oily-type liquids onto the deck and ground.

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e. Lack of training of personnel and written instructions.

f. The fact that although the inspection of the various shops indicated that solvents were being generated, that with one exception, no used solvents were observed. It should be noted that since shops are not submitting Forms DD-1348-1 to the DPDO for hazardous wastes, direct responsibility for failure to have expected volumes of wastes lies with these shops.

7. The inspection did not identify any non-compliance items attributable to Base Maintenance Division, However, the inspection team expressed concern/ interest in:

a. Cadmium levels in sludges at Camp Geiger

b. Hazardous waste characteristics of sludges from oil sumps and oil water separators

c. Source segregation of waste oil and solvents.

8. It is recommended that some action be initiated to provide adequate capacity to store hazardous wastes at building TP-451. A fenced, curbed pad similar to a typical drum storage structure provided under P-996 would be very helpful. Such a structure would have continued usefulness even after upgrading of TP-451 outlined in enclosure (9) is completed. Requiring generating shops to return physical custody of hazardous wastes once DPDO accepts accountability is causing a breakdown in the Hazardous Waste Management Program and is seriously undermining the credibility of the program. It is vital that AC/S Logistics get this facility in operation immediately.

DANNY D. SHARPE

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