

D R A F T C O P Y

MANAGEMENT PLAN

FOR

HAZARDOUS MATERIAL DISPOSAL

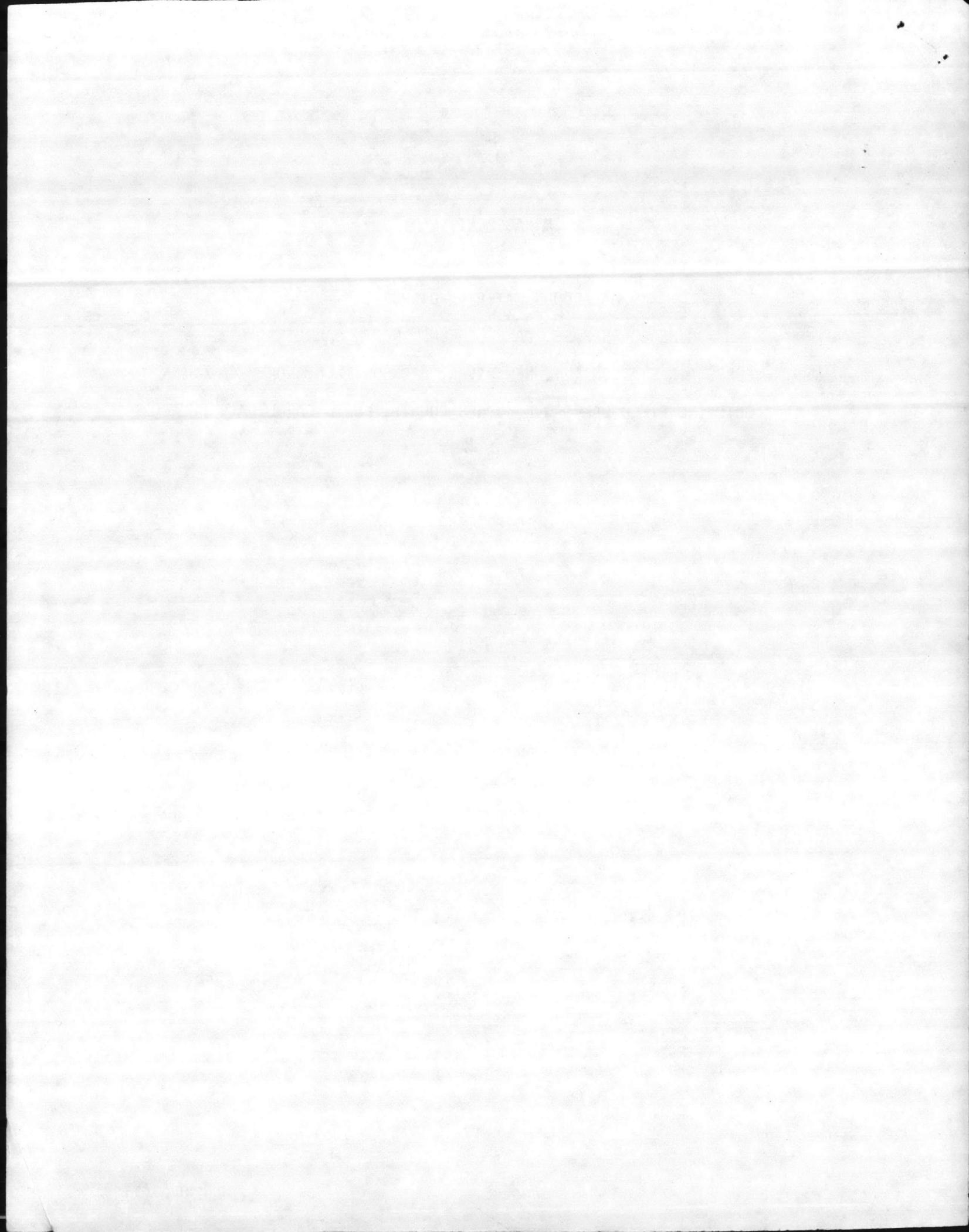
MARINE CORPS BASE, CAMP LEJEUNE, NORTH CAROLINA

MARINE CORPS AIR STATION (H), NEW RIVER, JACKSONVILLE, NORTH CAROLINA

OUTLYING FIELD OAK GROVE, JONES COUNTY, NORTH CAROLINA

OCTOBER 1980

ENCLOSURE (1)



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THE UNIVERSITY OF CHICAGO

PHYSICS DEPARTMENT

I. PURPOSE. The purpose of this plan is to provide information and guidance to civilian and military personnel and organizations involved in the disposal and related handling, storage and transportation of hazardous materials. This plan has three objectives:

a. To promote acceptable environmental practices during disposal and related packaging, transportation and disposal of hazardous materials.

b. Establishment of hazardous waste and hazardous material management practices and procedures designed to facilitate the smooth flow of materials and wastes to approved disposal.

c. To establish a monitoring and preventive maintenance program to ensure continued compliance with state and federal regulations.

II. DEFINITION OF TERMINOLOGY. For the purpose of determining responsibilities for disposal of hazardous materials and compliance with related Federal, State and local regulations, the following definitions will be used:

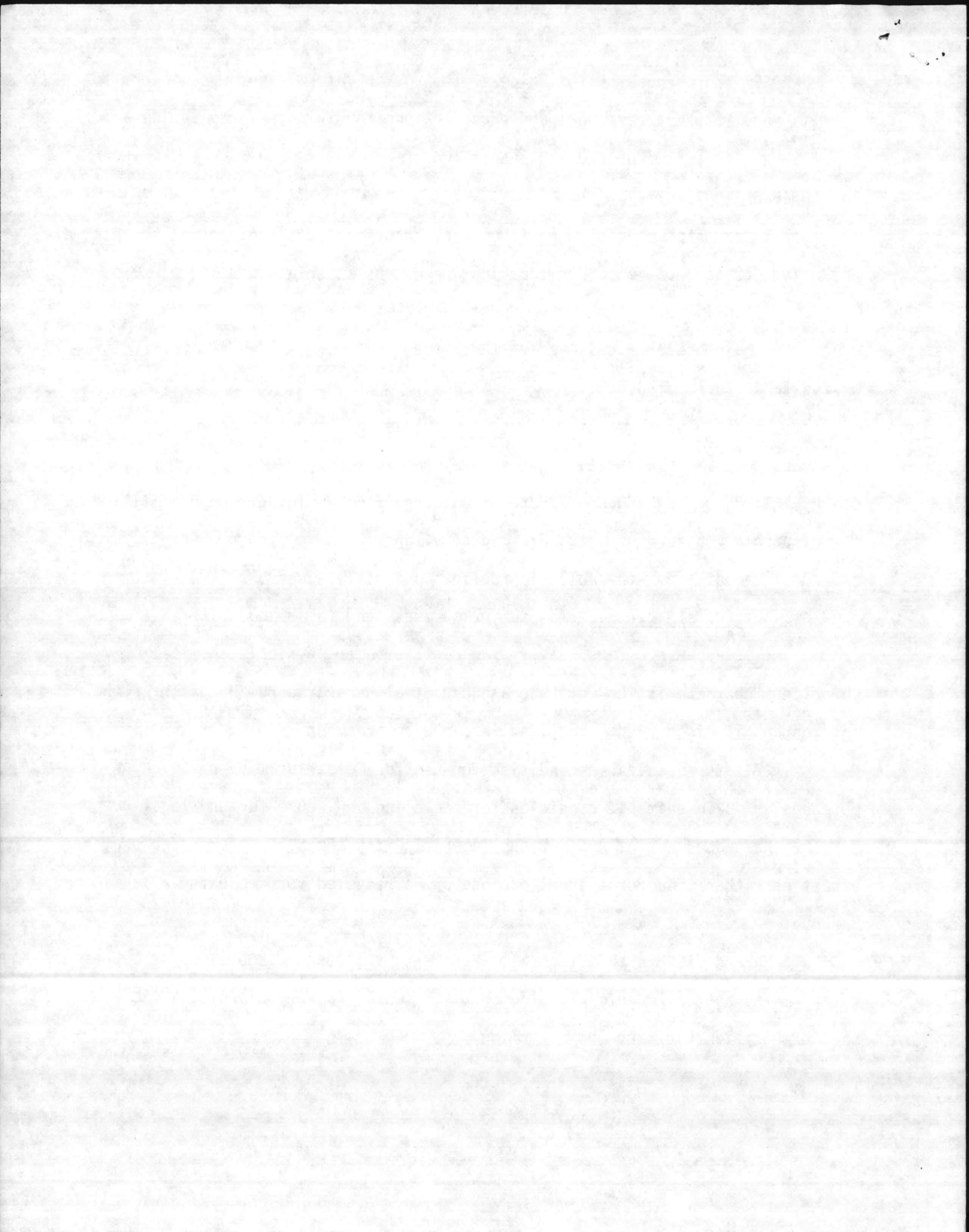
a. Hazardous Material. An item which meets the following criteria:

(1) Because of its quality, concentration or physical, chemical or infectious characteristics may pose a substantial hazard to human health or the environment if discharged or spilled into the environment.

(2) Is in suitable condition for use for legal primary or secondary purposes or is in suitable condition for recycling and reuse for any legal purpose.

b. Hazardous Waste. A hazardous material which through use or deterioration cannot be either used for a legal purpose or be recycled for reuse for a legal purpose.

c. Hazardous Material Disposal. Refers to the legal disposal of hazardous materials by authorized officials (generally Defense Property Disposal Officer) by sale or donation for reuse or recycling.



d. Hazardous Material Transporter. The organization responsible for the operation of vehicles utilized to move hazardous materials aboard Base.

e. Hazardous Material Disposal Coordinator. An official at each Base Tenant Command and at MCAS(H), New River responsible for coordinating that Command's hazardous material disposal activities.

f. Hazardous Material/Waste Spill. The discharge of any amount of hazardous material or hazardous waste either (1) on or into the lands and waters of this installation; (2) during the transportation of hazardous wastes to a treatment, storage or disposal site or (3) during the transportation of a hazardous material by military vehicle utilized by an activity located at this installation.

g. Hazardous Waste Generation. A term utilized by the Environmental Protection Agency (EPA) to refer to any person or organization producing hazardous waste subject to EPA Regulations promulgated under the Resource Conservation and Recovery Act(RCRA). Marine Corps Base, Camp Lejeune and Marine Corps Air Station (H), New River have been identified as generators subject to RCRA.

h. Hazardous Waste Transporter. A term utilized by EPA to identify a person or organization transporting hazardous wastes by air, rail, water, or on public highway. Marine Corps Base and Marine Corps Air Station (H), New River have been identified as hazardous waste transporters.

i. Hazardous Waste Treatment, Storage, and Disposal. Terminology utilized by EPA to identify activities which are regulated by RCRA and require an EPA permit. Storage refers to storage exceeding 90 days. Marine Corps Base, Camp Lejeune has been assigned this responsibility for this installation *(See (k) below)*.

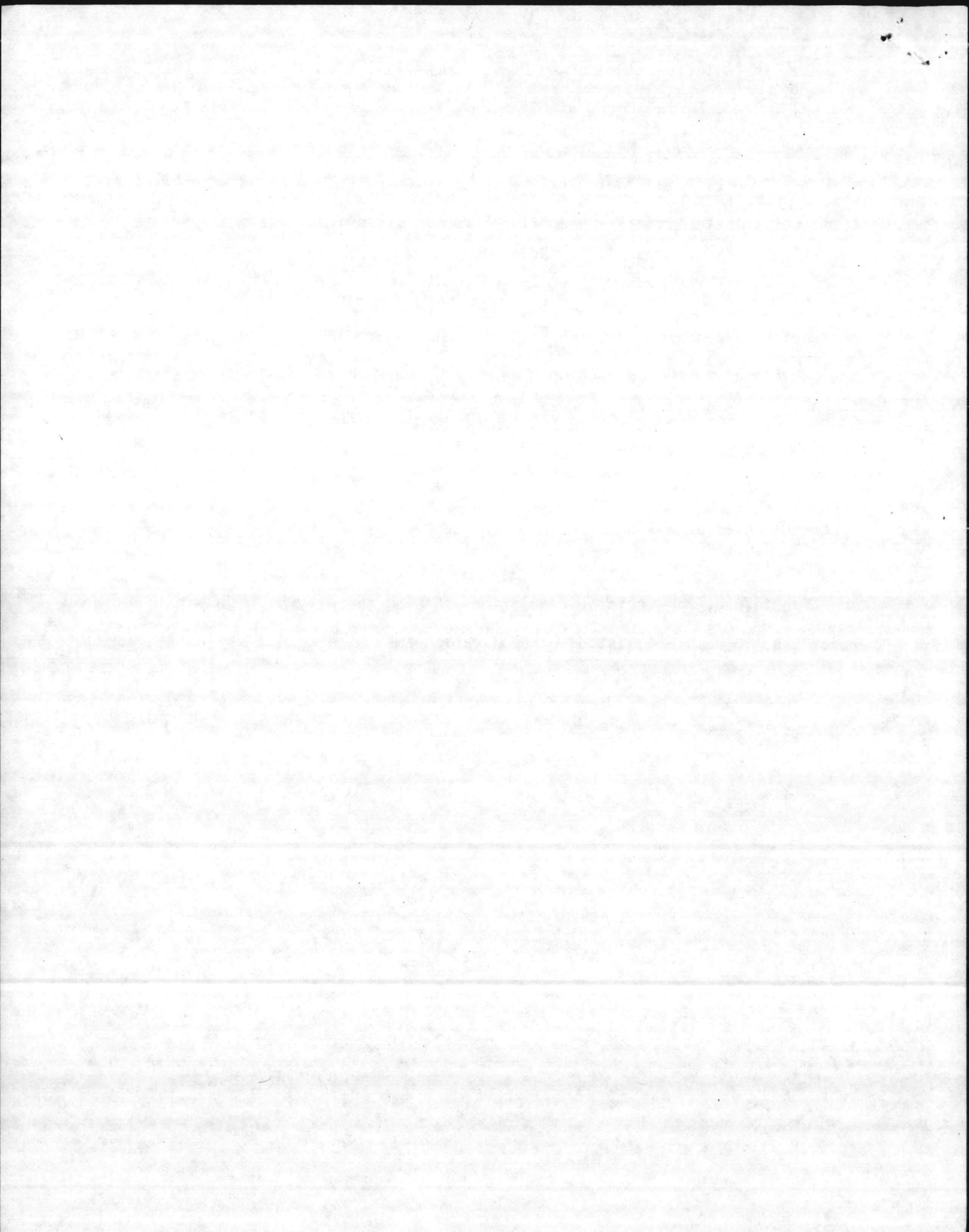
j. Hazardous Waste Shipping Manifest. A term utilized by EPA to refer to a document required to accompany all shipments of hazardous wastes on the public highway and document the arrival at an approved hazardous waste treatment, storage or disposal facility.

k. Installation. Refers to Marine Corps Base, Camp Lejeune, Naval Regional Medical Center, Marine Corps Air Station(H), New River, and outlying field, Oak Grove.

III. CURRENT HAZARDOUS MATERIAL DISPOSAL PROGRAM

a. Authority and Applicability. Marine Corps policy directs each activity commander to establish a single effort program of environmental management. MCO P11000.8A provides guidance and designates Marine Corps Base, Camp Lejeune, and Marine Corps Air Station, New River, as a single activity for the purposes of environmental program development and coordination. Accordingly, this plan has been developed by the Commanding General, Marine Corps Base, in cooperation with other local commands, to establish a coordinated program to manage the disposal of hazardous materials aboard this installation.

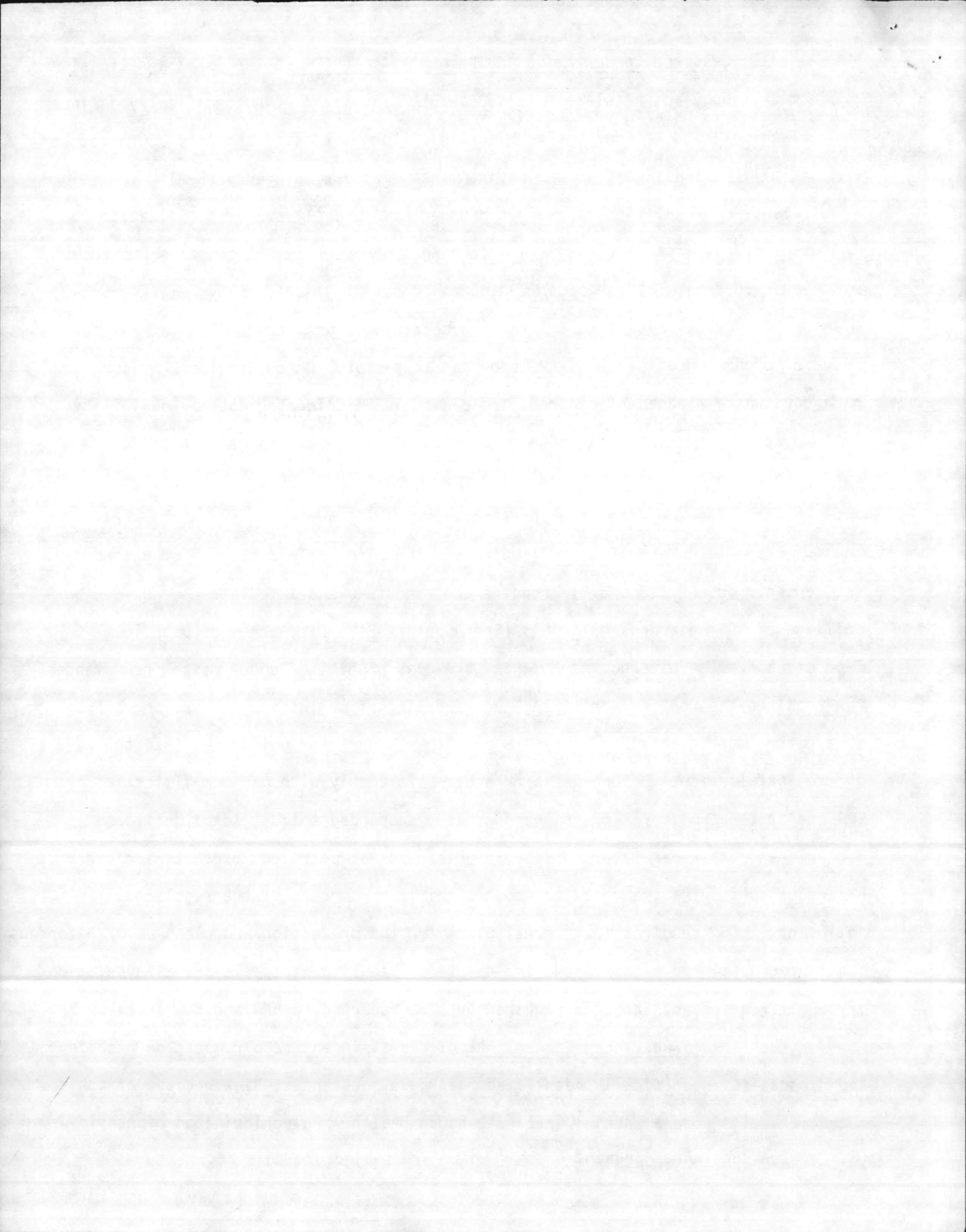
b. Laws and Regulations. Each of the following regulations impact on hazardous material disposal. Due to the complexity of this ^{Program}~~problem~~, conflicts between different regulations may arise. Until adequate guidance and clarification can be obtained, the stricter regulations should generally be followed. Caution:
^{The following}
~~This~~ is not a complete listing of applicable laws.



1. Resource Conservation and Recovery Act (RCRA) establishes a national program to manage and regulate hazardous waste disposal. RCRA specifically defines federal agencies to be "persons" subject to all provisions of the act. Enforcement responsibility is assigned to the Environmental Protection Agency (EPA). The major requirements of regulations promulgated under RCRA are (1) proper notification to EPA of hazardous waste activity (2) obtaining a permit from EPA to store hazardous waste over 90 days, (3) use of an EPA approved shipping manifest system, (4) submission of regular reports to EPA and (5) obtaining a permit from EPA to treat or dispose of hazardous waste. RCRA provides that states which develop EPA approved hazardous waste management programs and plans may be delegated the responsibility to enforce RCRA regulations. RCRA regulations make the discharge of hazardous wastes into the environment without a proper permit from EPA or the state an illegal act subject to severe fines and penalties.

2. Clean Water Act (CWA) addresses the handling and storage of hazardous substances. ^{Code of Federal Regulations} 40 (CFR) 116 and 117 require the reporting and immediate cleanup of spillage of 299 hazardous materials (See Appendix B). Discharges of petroleum products and ~~other~~ hazardous substances are also prohibited under most circumstances. CWA requires the routine monitoring and reporting of pollutants in discharges from sewage treatment plants, storm sewers and other sources of pollutants into the waters of the installation. Discharges are required to comply with maximum limits set by EPA and state permits for pH, oil and grease, suspended solids, total coliform bacteria and other parameters. Improper discharge of petroleum products and other hazardous substances is one of the most significant sources of the regulated pollutants. CWA requires that formal plans for the prevention and clean up of hazardous substances spills be prepared and implemented. Significant spills and all violation of permit requirements are, as required by law, reported to EPA and the state promptly.

3. Toxic Substances Control Act places stringent requirements on handling and disposal of specifically identified hazardous substances which because of their characteristics pose a special threat to human health. Polychlorinated biphenyls (PCB's) are substances present on base which are subject to this act.



4. Department of Transportation Regulations set standards for the transportation of hazardous materials and wastes and the packaging and labeling requirements related thereto.

5. Occupational Safety and Health (OSHA) sets standards for protection of employee health and safety in the work place.

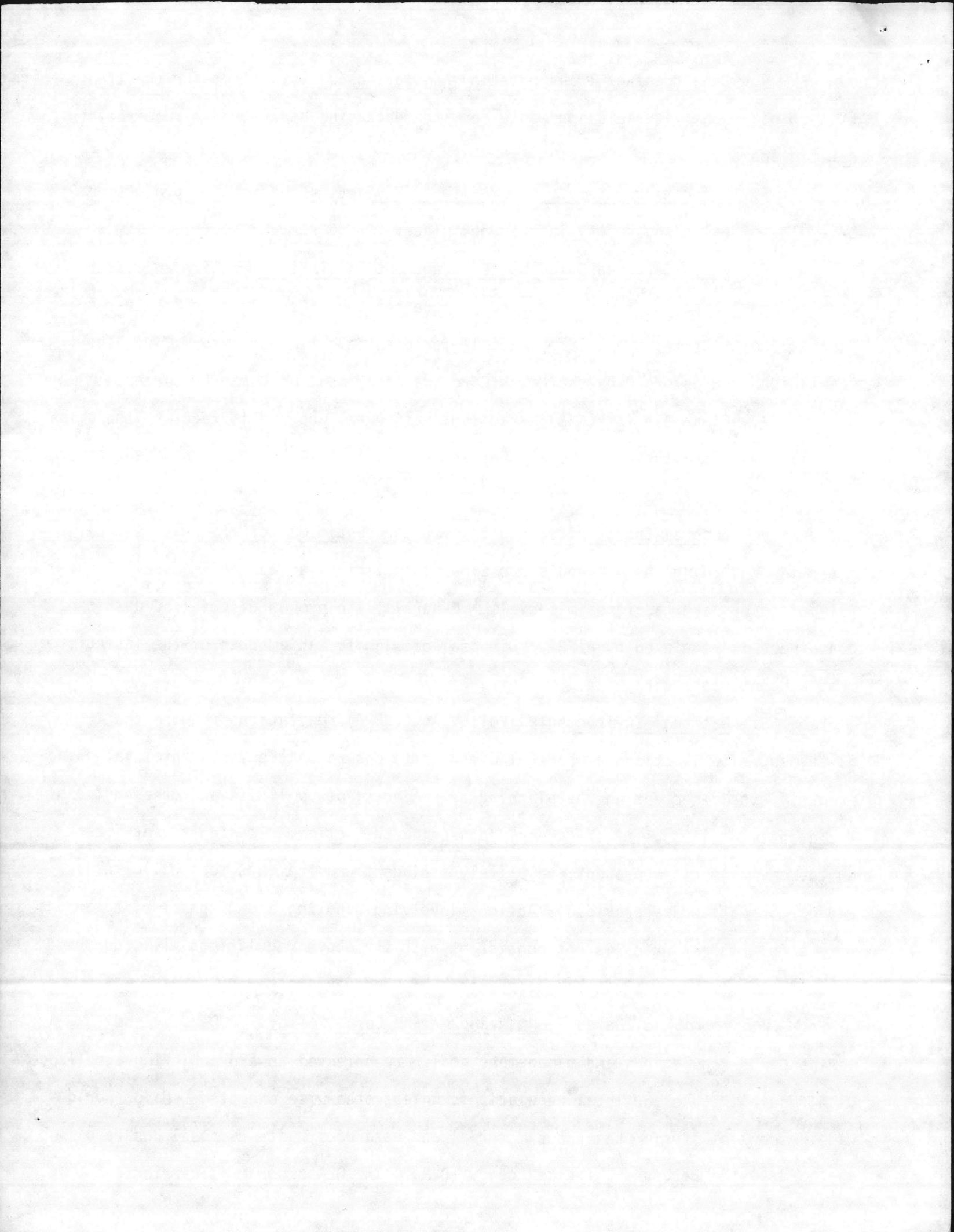
6. North Carolina Solid Waste Management Regulations require an operating permit for the base landfill. Cross compliance requirements with other state regulations severely restrict the use of the landfill for disposal of hazardous ~~wastes~~ ^{materials}. The regulations are enforced by the North Carolina Department of Human Resources.

7. Clean Air Act (CAA) establishes a federal program to regulate the emission of pollutants into the atmosphere. Enforcement of the CAA has been delegated to the state by EPA. Burning hazardous wastes requires a permit or approval from the state.

8. Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) is the basic law governing the use and disposal of insecticides aboard this installation. All pesticides are hazardous materials. Generally the proper disposal of pesticide containers is regulated by FIFRA. Disposal of significant amounts of the insecticide must be consistent with RCRA.

9. National Environmental Policy Act (NEPA) regulations require the assessment of all actions by federal agencies to ensure that environmental values are properly considered during the planning of projects, new policies and other actions. The assessment is done by the agency sponsoring the action. If significant impact on the environment is present, relatively stringent requirements for public review and participation are provided. Actions involving handling and disposal of hazardous materials ~~wastes~~ in a manner which is not consistent with the above regulations will require an environmental assessment and concurrence of Headquarters Marine Corps.

c. Department of Defense, Navy and Marine Corps Policy. DOD, Navy and Marine Corps regulations and management goals are oriented toward achieving compliance with federal, state and local regulations, unless otherwise exempted. Major worldwide responsibility for hazardous material and hazardous waste disposal has been assigned to the Defense Logistics Agency (DLA). The DLA program is carried out



locally by the Defense Property Disposal Officer (DPDO). However the DLA and DPDO are not expected to have the facilities and manpower to fully implement the hazardous waste aspects of these responsibilities for several years. Marine Corps Order 4570.24 provides policy guidelines within which local implementation of current national initiatives will be carried out.

d. Review of Present Status of Local Program.

1. Background. A survey of hazardous material disposal by local commands has been conducted. Three types of information were sought:

(a) Location of local organizations producing significant quantities of hazardous materials and wastes requiring disposal.

(b) Estimates of volumes of each type of hazardous material or wastes generated annually requiring disposal.

(c) Adequacy of facilities, procedures, and awareness of personnel to hazardous material and waste disposal and management.

2. Types of Materials Generated.

(a) General. Information obtained during the survey indicated that materials generated locally were very typical as indicated by Appendix C. Appendix C contains information provided by Headquarters Marine Corps to assist installations in identifying the various operations and functions which generate wastes. The asterisks(*) indicate those local functions, processes and types of wastes identified during the survey. Appendix D identifies Types and Volumes Produced. The survey indicated that recyclable materials such as used oils and solvents make up a large percentage by volumes of materials requiring disposal.

(b) Management Concerns related to hazardous material and waste generation and the operation of generating facilities closely parallel those identified during the implementation of the oil pollution abatement program now in operation installation-wide. Also, oily waste constitutes the majority of hazardous materials requiring disposal identified during the survey based on volume. Consequently, the hazardous material disposal program for the most part will be an upgrading of the existing oil pollution abatement program.

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The following concerns were identified:

(1) Availability of written hazardous material handling procedures to personnel at generation sites with significant potential for accidental spills and other violations of environmental regulations.

(2) Availability of hazardous material storage containers, supplies and equipment.

(3) Adequacy of personnel's awareness to and access to technical information regarding the characteristics, specific hazards and proper labeling requirements of the different types of materials handled.

(4) Adequacy of routine training provided by commands to personnel handling different types of hazardous materials, particularly those regulated under RCRA.

(5) Adequacy of a readily available, properly marked and secured interim storage location at facilities handling and disposing of hazardous wastes and materials.

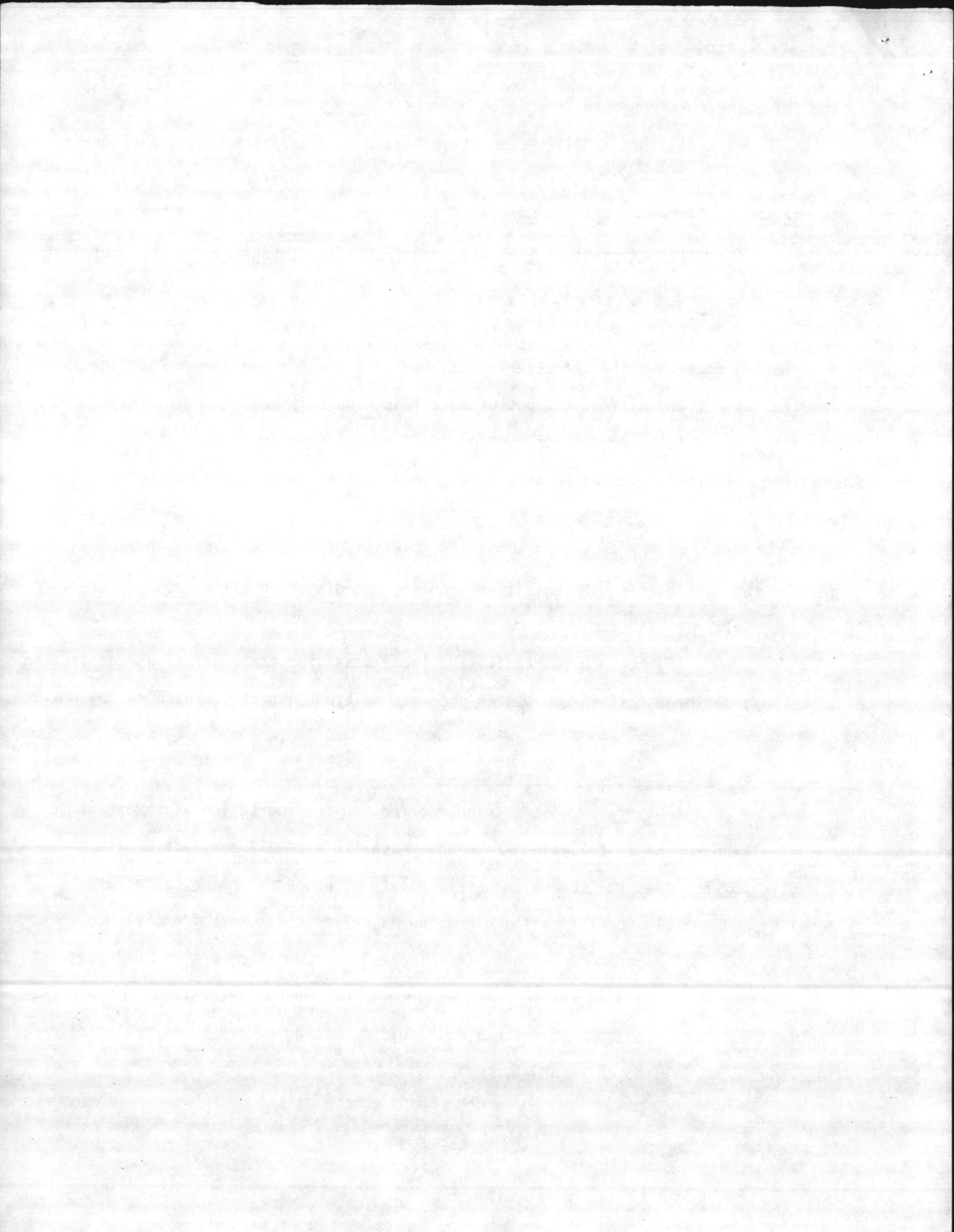
(6) Lack of a readily available means for the generating organization to dispose of the materials and wastes once accumulated (except for used petroleum products).

3. Hazardous Material Transportation.

(a) General. Vehicles required for the transportation of hazardous materials aboard the installation are readily available to all commands. With the exception of the need to improve the availability of proper shipping containers, labeling and vehicle identification signs, no major new costs were identified.

(b) Management Concerns related to transportation are as follows:

(1) Need for increased awareness of personnel involved to the special considerations to be addressed in handling, packaging and transporting of hazardous materials on the highway.



(2) Increasing the availability of proper shipping containers (preferably, the generator of hazardous materials requiring disposal will use storage containers capable of being transported without repackaging) and labeling and marking supplies.

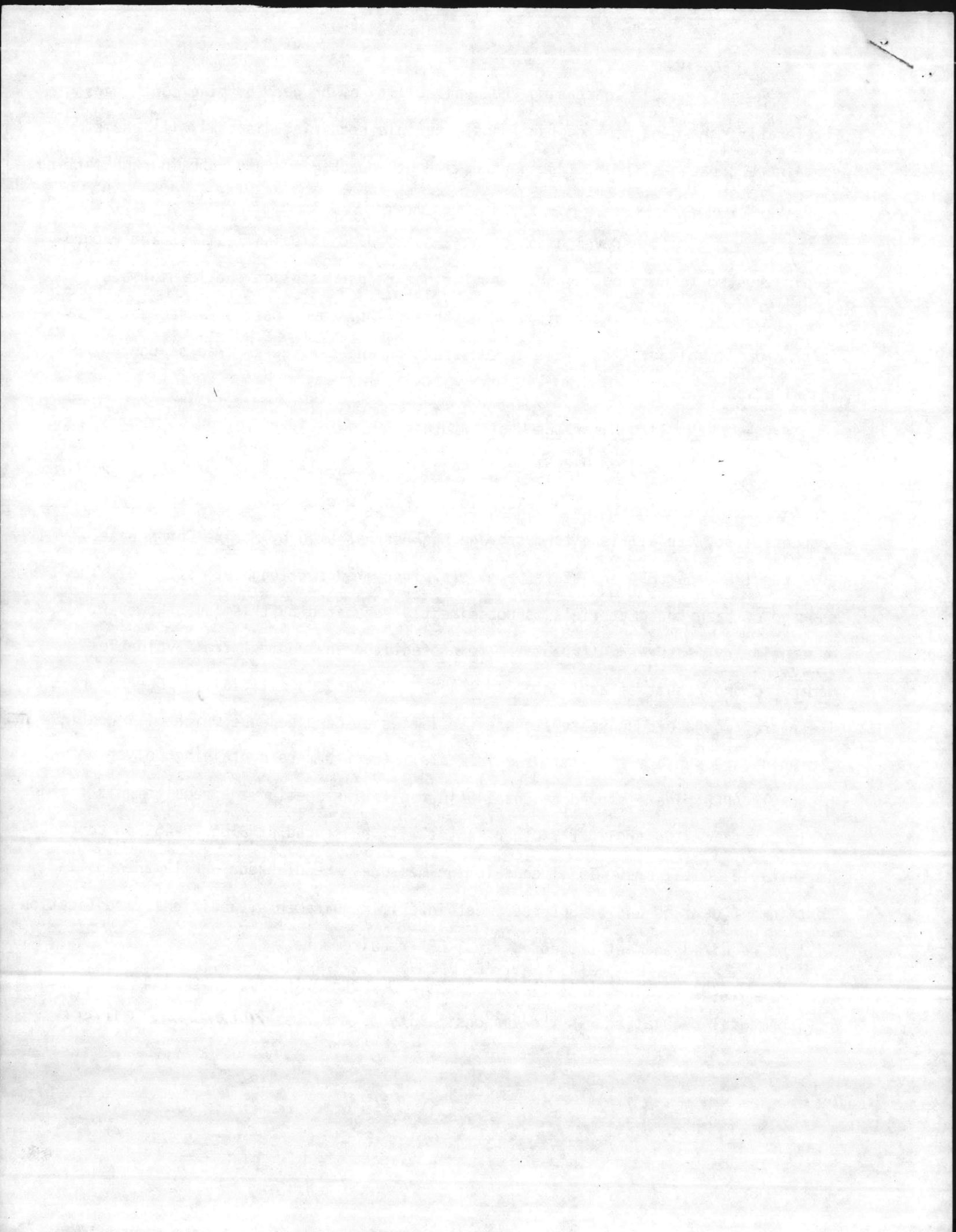
(3) Development of an EPA approved shipping manifest and record-keeping system for use during shipments of hazardous wastes on public highways.

(4) Increasing the control of hazardous waste transportation by contractors involved in demolition, construction and service contracts aboard the installation.

4. Long Term Hazardous Waste Storage

(a) Long term storage of hazardous waste is defined by RCRA as storage for over 90 days. There are no exceptions for any wastes subject to the law. Responsibility for all long term storage has been assumed by Marine Corps Base. RCRA requires that EPA and state permits are required for long term storage. The storage of hazardous materials is not directly regulated by this law. However, precautionary measures must be taken to protect the environment from avoidable damage as the result of accidental spillages of hazardous materials, (See Appendix B). There are two hazardous waste storage facilities at Camp Lejeune which will continue and which are subject to permit requirements. Transformers containing polychlorinated biphenyls (PCB's) are stored at Lot 140 in facilities meeting the requirements of the Toxic Substances Control Act. Other wastes will be stored at Bldg TP-451 on concrete in suitable containers. Spill containment measures are planned. While the spill containment devices and structures meet interim requirements, additional modification will be required to meet projected final EPA requirements.

(b) Routine monitoring of long term storage to effect compliance with environmental regulations is the responsibility of the Base Maintenance Offices.

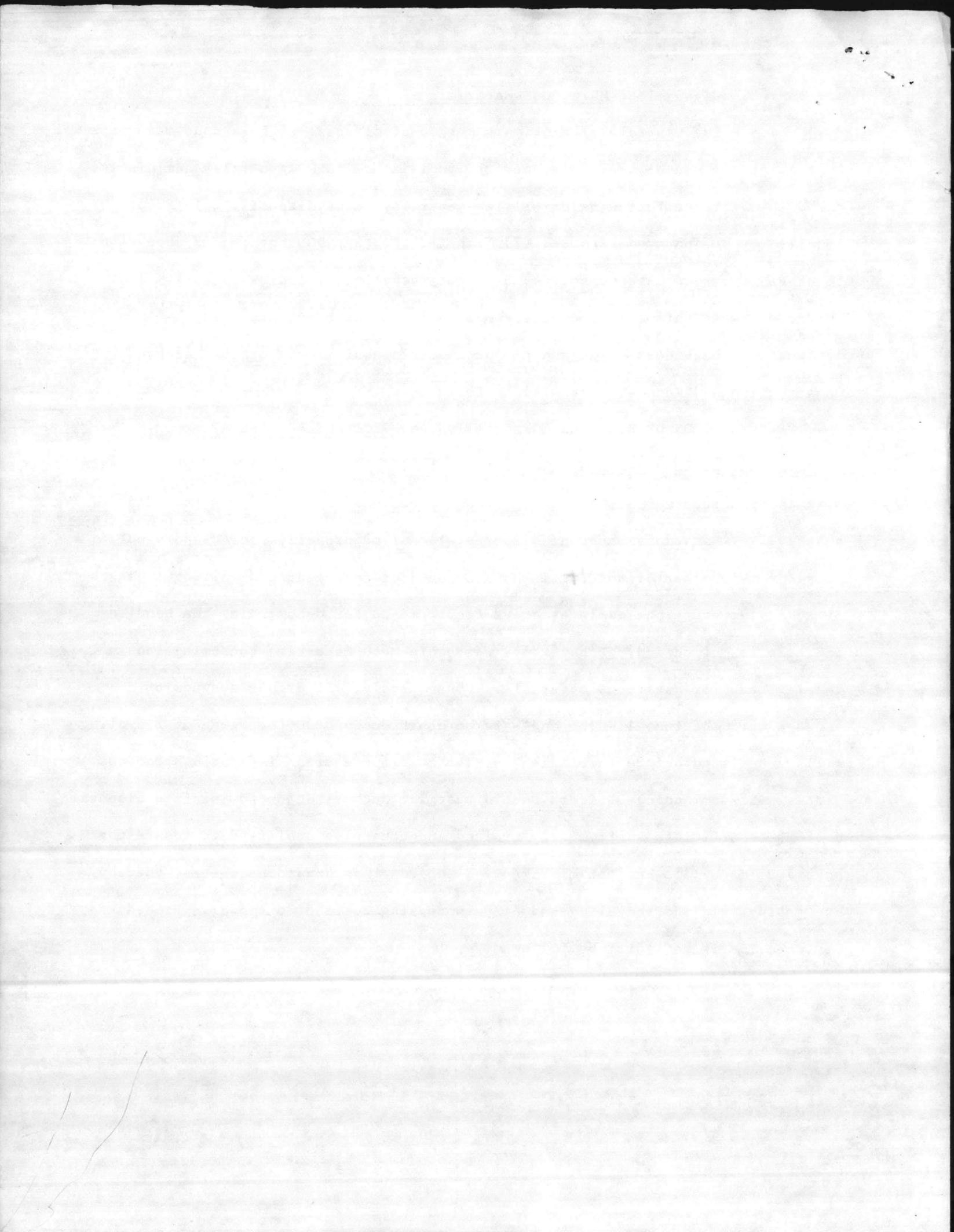


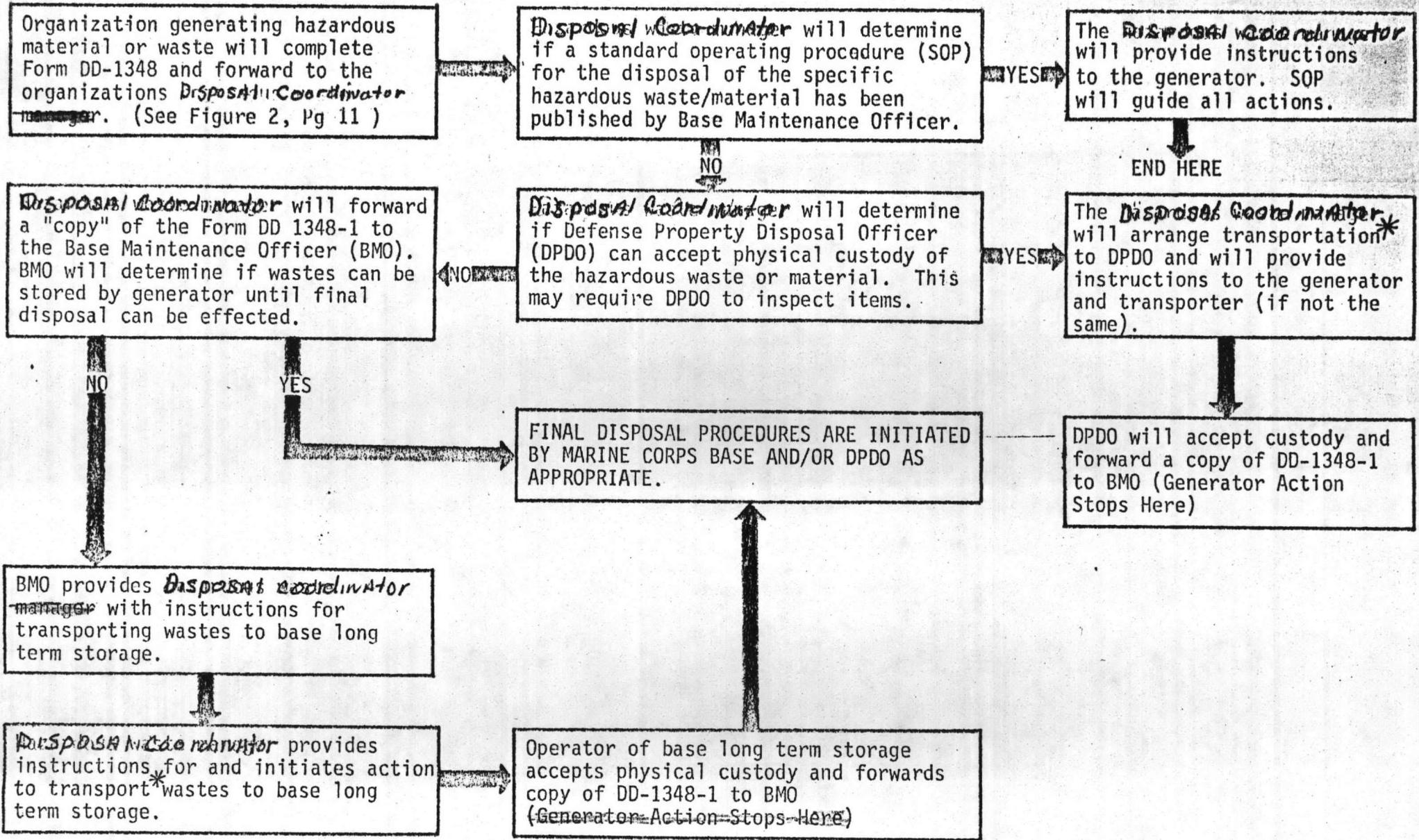
5. Disposal of Hazardous Materials

(a) General. The primary method of disposal of hazardous materials is through the use of privately operated facilities. DPDO generally administers the disposal. The following priorities generally guide disposal: (1) Reuse locally for an approved purpose; (2) Transfer to other DOD agency; (3) Donation to other government agency and (4) Sale for recycling or approved reuse. In the future when this fails to effect disposal the hazardous material shall be designated a hazardous waste and all procedural requirements of the Resource Conservation and Recovery Act will be followed.

IV. IMPLEMENTATION OF RESOURCE CONSERVATION AND RECOVERY ACT (RCRA).

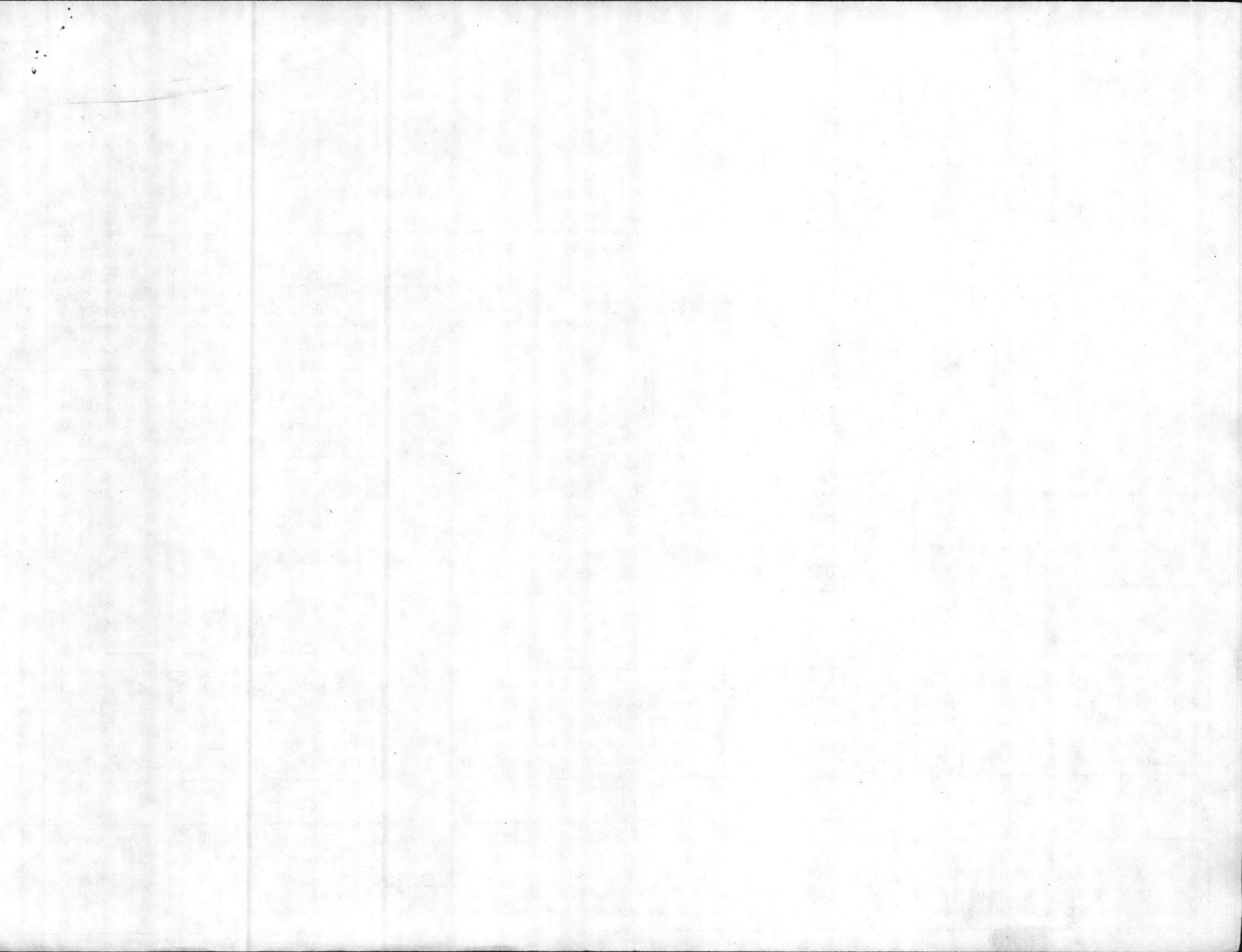
a. General Requirements. The intent of RCRA is to prevent improper discharge of hazardous substances into the environment during disposal of wastes. Consequently, any hazardous material disposed of must be properly stored and handled at all time whether or not ~~it~~ is a waste subject to the procedural requirements of RCRA. However, the administrative requirements for documenting the handling and transfer of custody of hazardous waste are much more time consuming and complex than for hazardous materials. Consequently, all proper avenues of reuse aboard the installation and sale or donation by DPDO for reuse or recycling will be utilized before initiating action to dispose of an item as a hazardous waste. All Commanding Officers should restrict authorization to initiate disposal actions to officials sufficiently trained and otherwise qualified to ensure that hazardous materials are not mistakenly disposed of as hazardous wastes, thereby preventing sale and recycling and also increasing costs of disposal. Procedures outlined in figure(1) will be followed.





*If an item to be transported is a hazardous waste subject to RCRA and will be transported on the public highway, a hazardous waste shipping manifest will be prepared prior to transporting.

Figure (1). Hazardous Waste Disposal Procedures



b. Specific Responsibilities for Each Type of Hazardous Waste Activity

1. Organization having materials requiring disposal or generating wastes shall take actions required to:

(a) Provide approved containers for each type of hazardous material or waste.

(b) Mark containers to clearly indicate the contents and appropriate hazards.

(c) Properly seal and store containers until transfer to approved disposal or storage can be effected.

(d) Request assistance from their organization's hazardous material disposal coordinator (See figure (1), page 10) with disposal of all hazardous materials within ten days of the date stored, unless the storage site has a permit to store wastes from the EPA/State.

(e) Provide routine inspections of storage facilities to prevent and correct leaks and spills of hazardous material and wastes.

(f) Transport hazardous wastes to long term storage when required.

(g) Report problems and deficiencies related to hazardous materials management to the generator's hazardous material disposal coordinator.

(h) Immediately notify Base Fire Department of all oil and other hazardous materials/wastes spills.

2. Local Transporters of hazardous materials during their disposal, shall take action required to:

(a) Ensure that types and amounts of hazardous materials and wastes transported agree with documentation on form DD 1348-1, and/or Hazardous Waste Shipping .

(b) Ensure that all hazardous materials are properly containerized and labeled prior to loading for transport.

(c) Provide all drivers of vehicles transporting hazardous materials training in appropriate phases of handling, labeling and spill containment, cleanup and reporting.

(d) Properly mark all vehicles used to transport hazardous materials as required by regulations.

hazardous material/waste spill which occurs, including those outside the boundaries of this installation.

3. Hazardous Waste Storage Operators will take action required to:

(a) Ensure that all hazardous wastes are properly identified, containerized and labeled prior to placing in storage.

(b) Routinely inspect all storage areas as required to prevent avoidable leakage and spillage of hazardous wastes.

(c) Inform the appropriate officials of any storage deficiencies related to adequacy of facilities and equipment.

(d) Ensure that all legal requirements and safety requirements are properly complied with or deficiencies reported.

(e) Report all oil and other hazardous materials/wastes spills to the Base Fire Department immediately.

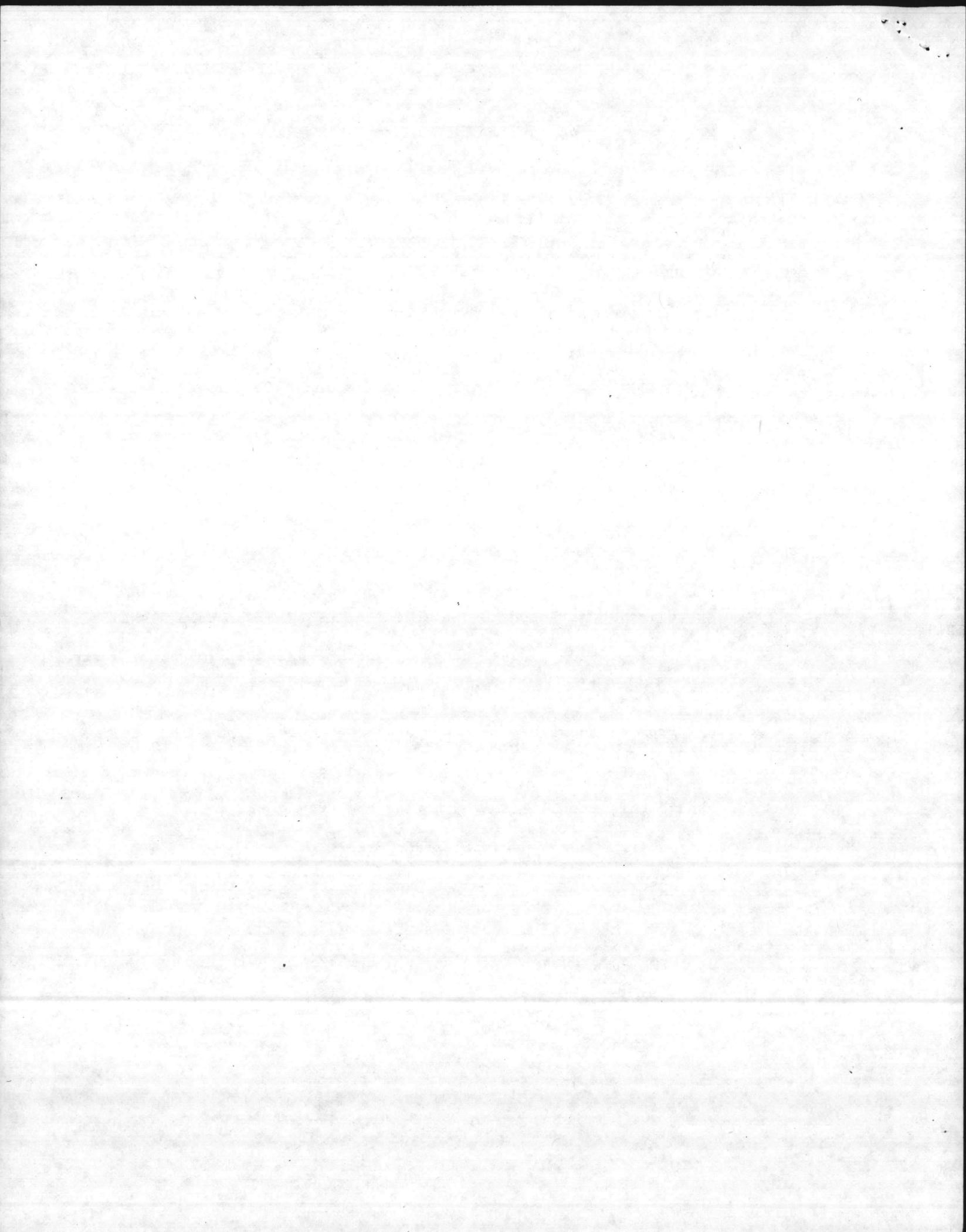
4. Hazardous Materials Disposal Coordinator will take action required to:

(a) Identify and initiate action to correct hazardous material and waste storage, handling and transportation deficiencies (See Appendix A) which have the potential for causing violations of applicable hazardous material/waste regulations.

(b) Provide supplies, manpower and other command resources to the on-scene-coordinator, as requested, during the clean up of any hazardous materials/wastes spill aboard this installation or during the transportation of these substances on the public highway by local transporters.

(c) Ensure that all procedural and reporting requirements of hazardous materials/wastes regulations are complied with.

(d) Provide adequate training to all personnel within the Command that are involved in the handling, storage, transportation and spill cleanup of hazardous materials/wastes.



(e) Keep records and information as required to prepare reports to EPA and state regulatory agencies and Headquarters Marine Corps.

(f) Ensure that oil and other hazardous materials/wastes handling, storage, and spill containment, clean up and reporting procedures are available at all facilities handling hazardous wastes and materials.

(g) Coordinate all disposal of hazardous materials and wastes as required to ensure procedures in Figure (1) on page 10 of this plan are followed.

