

# Memorandum

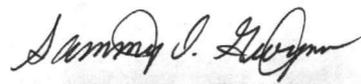
DATE: 26 JAN 87

FROM: BIOLOGICAL TECHNICIAN

TO: MEMO TO FILE

SUBJ: FOLLOW-UP COMPLIANCE INSPECTION ON HQ BN

THE DISCREPANCIES CITED ON A SCHEDULED COMPLIANCE INSPECTION CONDUCTED 24 NOV 86 HAVE BEEN CORRECTED. ALL HW SITES WERE IN COMPLIANCE AS OF THIS INSPECTION.

  
SAMMY D. GWYNN

INSTRUCTIONS

6240  
NREAD  
DEC 05 1986

From: Commanding General, Marine Corps Base, Camp Lejeune  
To: Commanding Officer, Headquarters Battalion, Marine Corps  
Base, Camp Lejeune

Subj: HAZARDOUS WASTE COMPLIANCE INSPECTION OF HEADQUARTERS  
BATTALION, OP 24 NOV 86

Ref: (a) BO 6240.5  
(b) CG/MCB 291625Z Oct/86

Encl: (1) Noted violations and recommended corrective action  
(2) Reference Cited  
(3) Location of authorized HW Generation and Handling Sites

1. The subject inspection was conducted by Base environmental personnel in accordance with references (a) and (b). Enclosures (1) through (3) provide findings, recommendations and supporting information relative to the subject inspection. It should be noted that violations cited in enclosure (1) are violations of Environmental Protection Agency regulations described in reference (a).

2. Violations cited in enclosure (1) should be corrected within fifteen calendar days from the date of this letter. Addressee should immediately notify the Assistant Chief of Staff, Facilities, Marine Corps Base, of any discrepancy which cannot be corrected within the stated time frame. A reinspection will be conducted by Base environmental personnel in cooperation with the Headquarters Battalion Hazardous Material Disposal Officer (HMDO).

3. Enclosure (3) was developed based on information provided by the Headquarters Battalion HMDO during the subject inspection. Addressee is advised that for the purposes of compliance with reference (a), the sites shown on enclosure (3) will be considered the only authorized locations where hazardous waste may be routinely generated and accumulated by Headquarters Battalion. In the event additional sites are required, addressee will make written notification requesting site approval to the Commanding General, Marine Corps Base, attention Director, Natural Resources and Environmental Affairs Division. Except in an emergency, the notification shall be submitted so as to reach Natural Resources and Environmental Affairs Division at least fifteen calendar days prior to using site.

DEC 15 1980

COMMUNICATIONS SECTION, FEDERAL BUREAU OF INVESTIGATION, WASHINGTON, D.C. 20535

TO: SAC, NEW YORK (100-100000) FROM: SAC, PHOENIX (100-100000)

RE: [Illegible]

DATE: [Illegible]

1. [Illegible] (1) [Illegible] (2) [Illegible] (3) [Illegible]

2. [Illegible] (1) [Illegible] (2) [Illegible] (3) [Illegible]

3. [Illegible] (1) [Illegible] (2) [Illegible] (3) [Illegible]

4. [Illegible] (1) [Illegible] (2) [Illegible] (3) [Illegible]

5. [Illegible] (1) [Illegible] (2) [Illegible] (3) [Illegible]

6240  
NREAD

Subj: HAZARDOUS WASTE COMPLIANCE INSPECTION OF HEADQUARTERS  
BATTALION ON 24 NOV 86

4. Point of contact for this matter is the Base Hazardous Material Disposal Coordinator, Mr. Sammy Gwynn, extension 2083/1690. Mr. Gwynn is available to assist addressee develop a plan of action to correct and to prevent recurrence of cited discrepancies and to maintain compliance with reference (a).

T. J. DALZELL  
By direction



ORGANIZATION:

Headquarters Bn, MCB

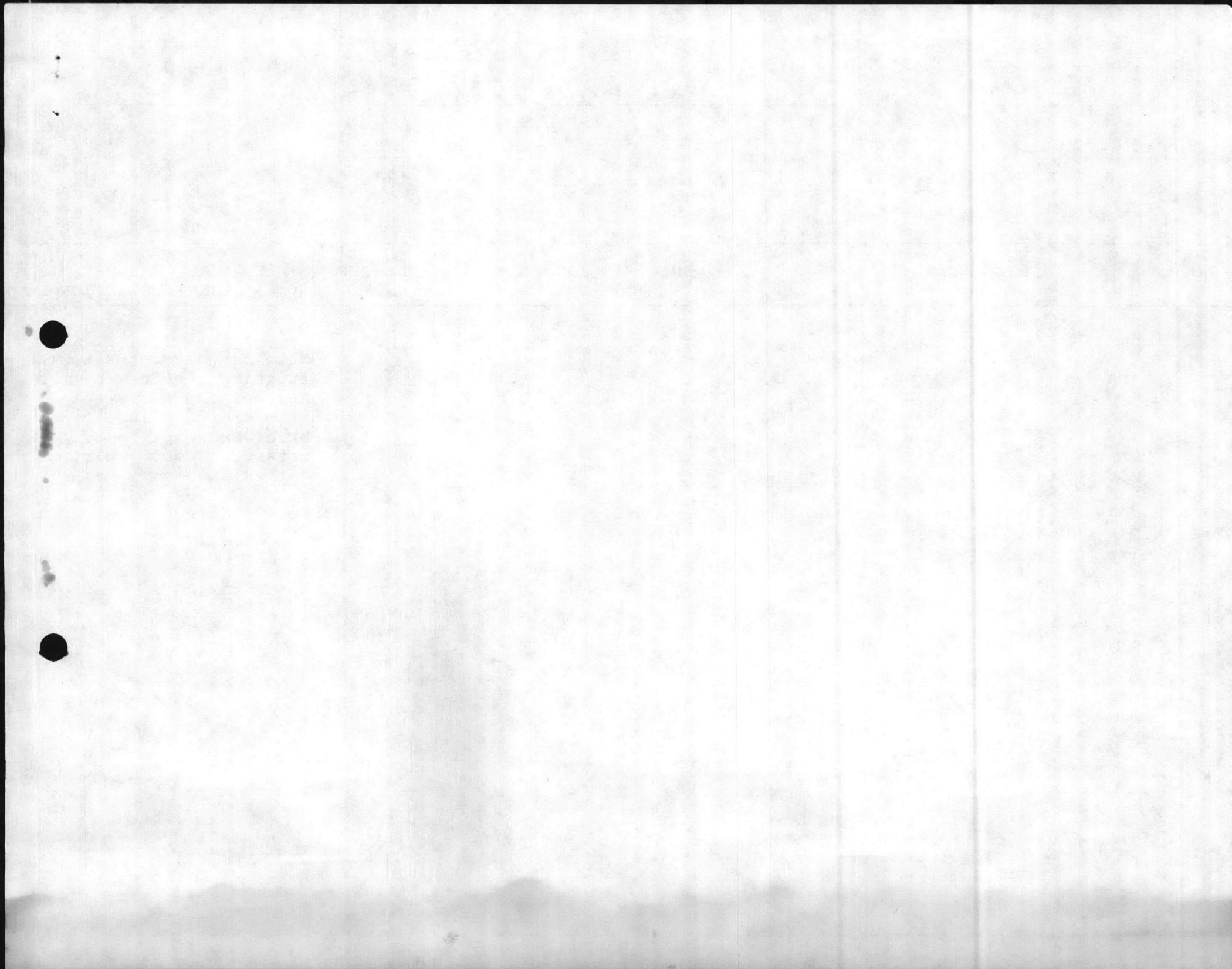
SHOP/UNIT:

Armory

NO.	DISCREPANCY	SPECIFIC LOCATION	REF	RECOMMENDED CORRECTIVE ACTION
1	Failure to establish & maintain training records	Armory	1	Maintain Hazardous Waste training records for Armorer and Assistant Armorer to include a brief description of all hazardous waste related duties.
2	Failure to post emergency spill procedures at generation site.	Armory	2	Post sign per BO 11090.1B encl (2) lc.

## \* COMMENT:

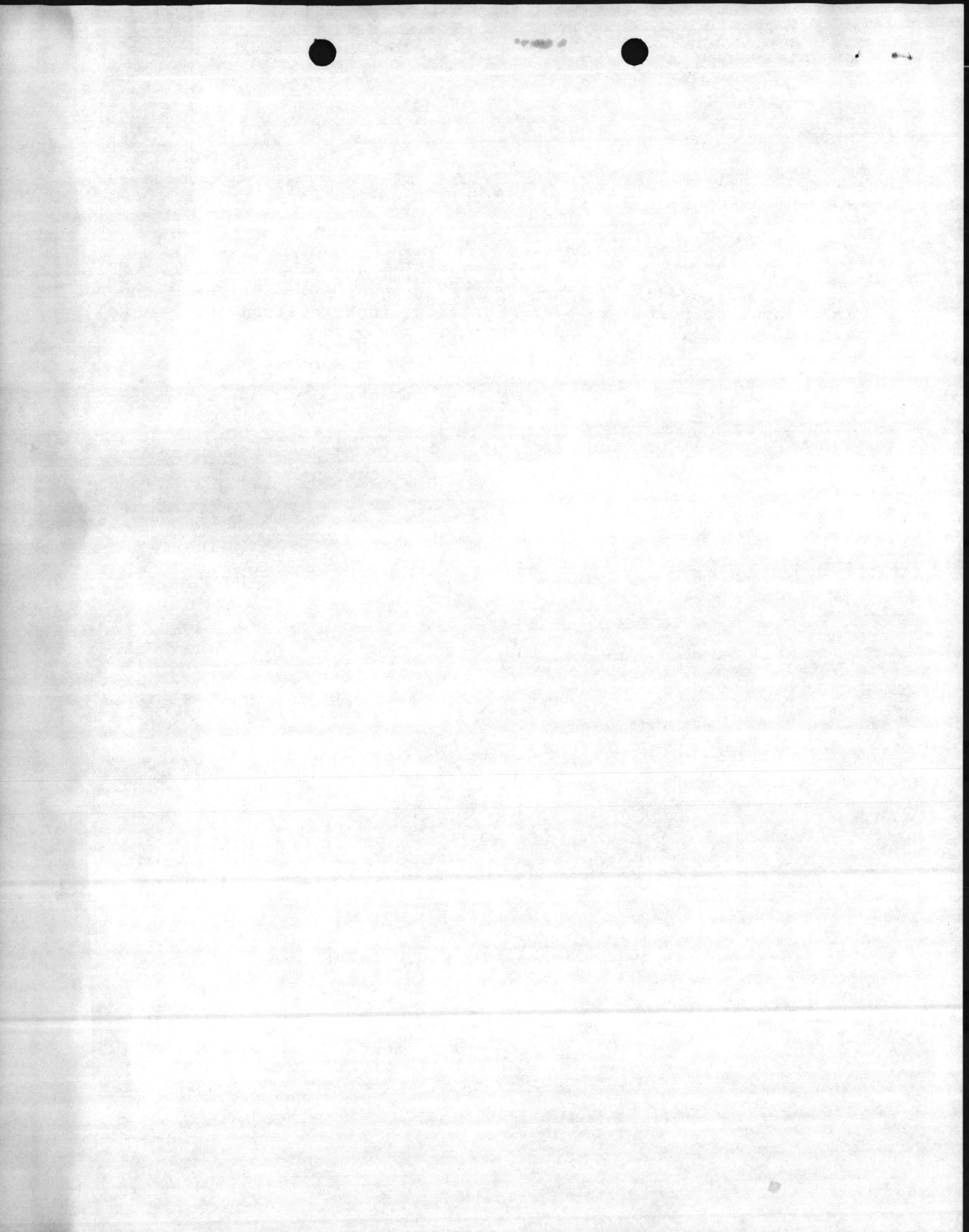
Training records for HMDO &amp; alternate must also be maintained at the S-4 level.



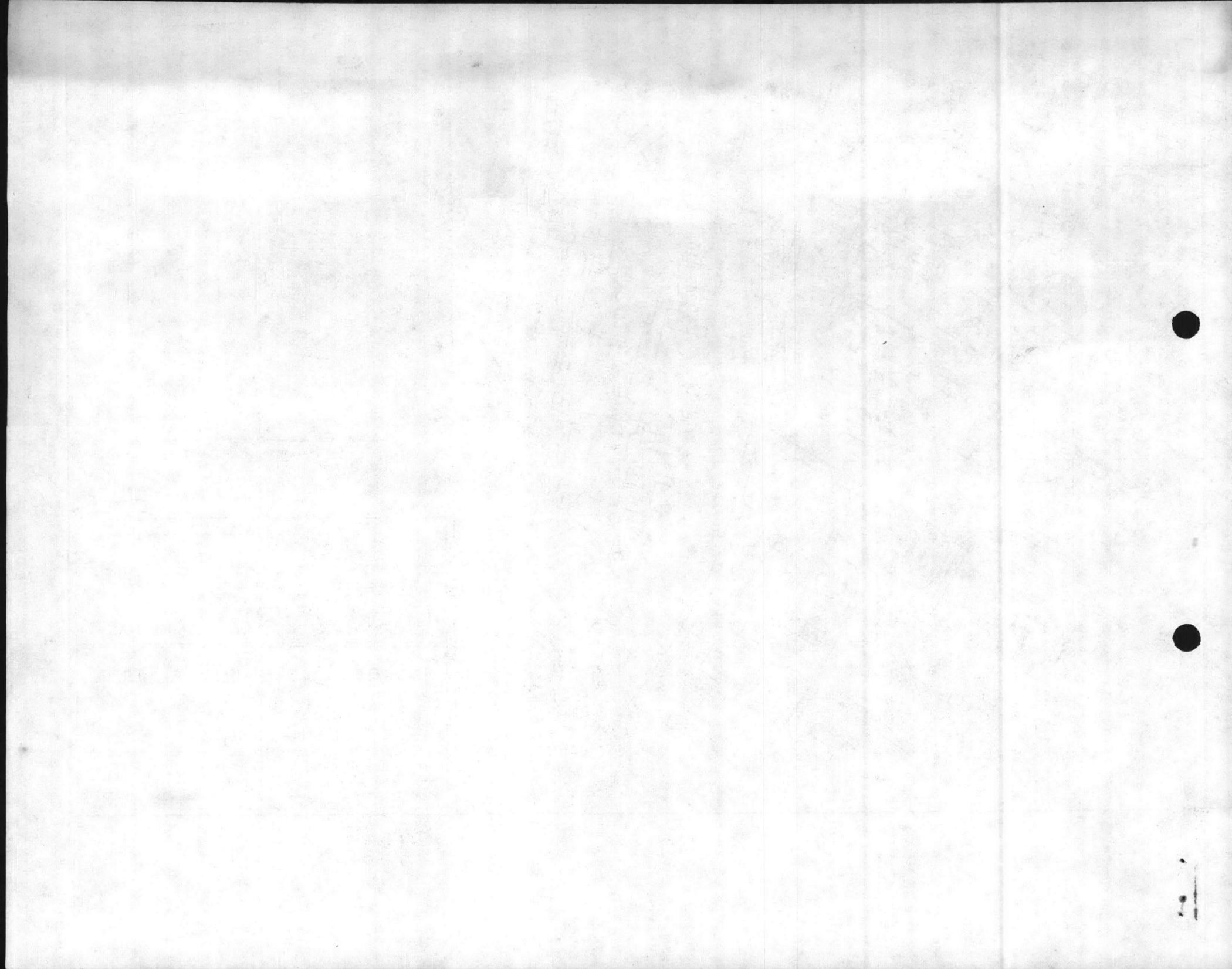
REF.

1. Section 1 of reference b "clear & concise training records shall be maintained on each person actively involved in Hazardous Waste Managemnet."

2. BO 11090.1B encl (2) para 1c - Posting of oil spill procedures Signs shall be posted in every building, tank location and field service where oil or hazardous materials are used.







## HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 24NOV86

1. Facility being Inspected: ARMORY Bldg 11
2. Organization in Charge: HQ Bn, MCB
3. Inspection Participants/Phone Number: SSGT Spann phone  
3852/1079, BELKER, Gwynn, SGT ZAMENSKI (ARMORY)
4. Description of HW Streams: WASTE SOLVENT FROM THE  
CLEANING OF WEAPONS

5. Are records of HW generation consistent with HW streams?     

## 6. HW Training

a. Are job descriptions available for all personnel actively involved in HW management? NO

b. Are training records adequate/current? NO

c. Are alternate personnel assigned to key positions? YES  
(If not, explain how unit deals with absence of key personnel)

d. Do contacted personnel demonstrate adequate knowledge of:

- |                                |            |
|--------------------------------|------------|
| (1) Regulatory Requirements    | <u>NO</u>  |
| (2) Applicable Base Orders     | <u>NO</u>  |
| (3) Types of HW Handled        | <u>YES</u> |
| (4) Proper Containers          | <u>NO</u>  |
| (5) Proper Labeling            | <u>NO</u>  |
| (6) Weekly HW Inspections      | <u>NO</u>  |
| (7) HW Turn-in Procedures      | <u>NO</u>  |
| (8) Health and Safety          | <u>YES</u> |
| (9) Spill Reporting Procedures | <u>NO</u>  |
| (10) Spill Response Duties     | <u>NO</u>  |

## 7. Condition of Storage Facilities

a. Date of last Fire Dept Inspection?     

b. Are spills likely to reach soil or water? NO

c. Are HW protected from weather? YES

d. Are weekly HW inspections conducted properly? NO

