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6240
NREAD
10 NOV 1986

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commanding Officer, Marine Corps Engineer School, (MCES),
Marine Corps Base, Camp Lejeune

Subj: HAZARDOUS WASTE COMPLIANCE INSPECTION OF MCES OF 3 NOV 86

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

Encl: (1) Noted violations and recommended corrective action
(2) References 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 MCES Hazardous Material Disposal Officer (HMDO).

3. Enclosure (3) was developed based on information provided by the MCES 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 MCES. 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.

4. Questions regarding this matter shall be referred to Mr. Danny Sharpe, extension 2083/1690.

T. J. DALZELL
By direction

10 NOV 1954

From: [illegible]
To: [illegible]
Subject: [illegible]

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HAZARDOUS WASTE NON COMPLIANCE NOTICE

DATE: 10 NOV 1986

ORGANIZATION:

MARINE CORPS ENGINEER SCHOOL

SHOP/UNIT:ARMORY BB-49, UTILITIES INSTRUCTION CO. BB-294
MAINTENANCE FACILITY BB-51

NO.	DISCREPANCY	SPECIFIC LOCATION	REF	RECOMMENDED CORRECTIVE ACTION
1.	Failure to identify and correct obvious defective containers	Maintenance Facility BB-51	1	Transfer contents into a servicable drum labeled in compliance with the reference. Enter corrective action on weekly inspection records.
2.	Failure to establish and maintain training records at Armory	Armory BB-49	2	Training records shall be maintained for Hazardous Waste Handlers and alternate to include a description of duties and training received for personnel at Armory.

* COMMENT: Upgrade training records and description of duties at the S-4 level, to include his alternate. Ensure that shop personnel are familiar with Hazardous Waste handling procedures and to answer routine questions.

REFERENCES

1. BO 6240.5 - paragraph 4.a(5). Provide weekly inspections of all inspections of all areas used to store hazardous waste and take action required to prevent and correct leaks, spills and other discrepancies. Maintain a log of these inspections.

2. Section 1 of enclosure (1) CG ltr 6240 NREAD of 9 Sep 85
"Clear, concise training records shall be maintained on each person actively involved in Hazardous Waste Management."

AUTHORIZED LOCATIONS OF HAZARDOUS WASTE

SITE NO. 1 - Armory BB-49

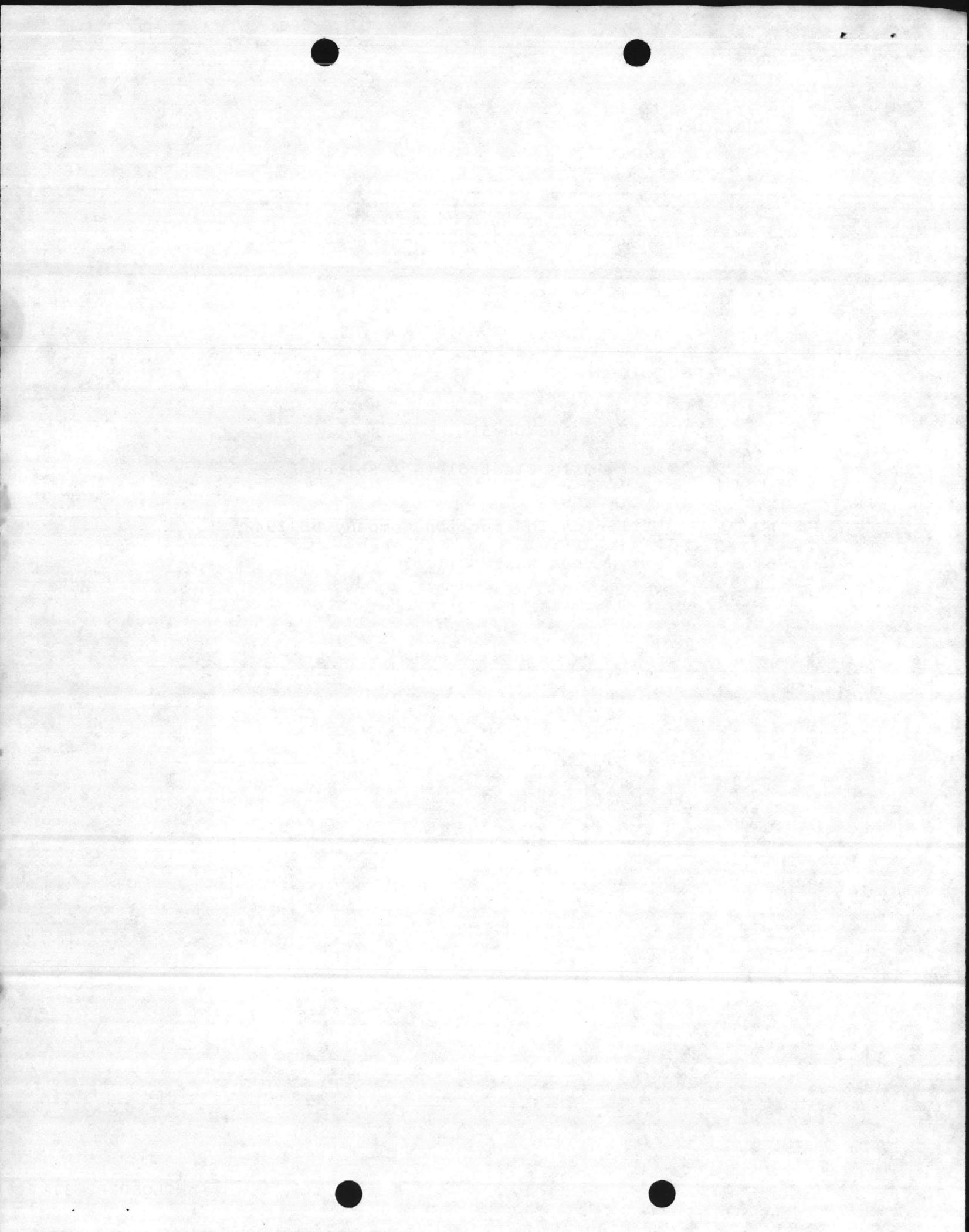
GENERATES - Solvents

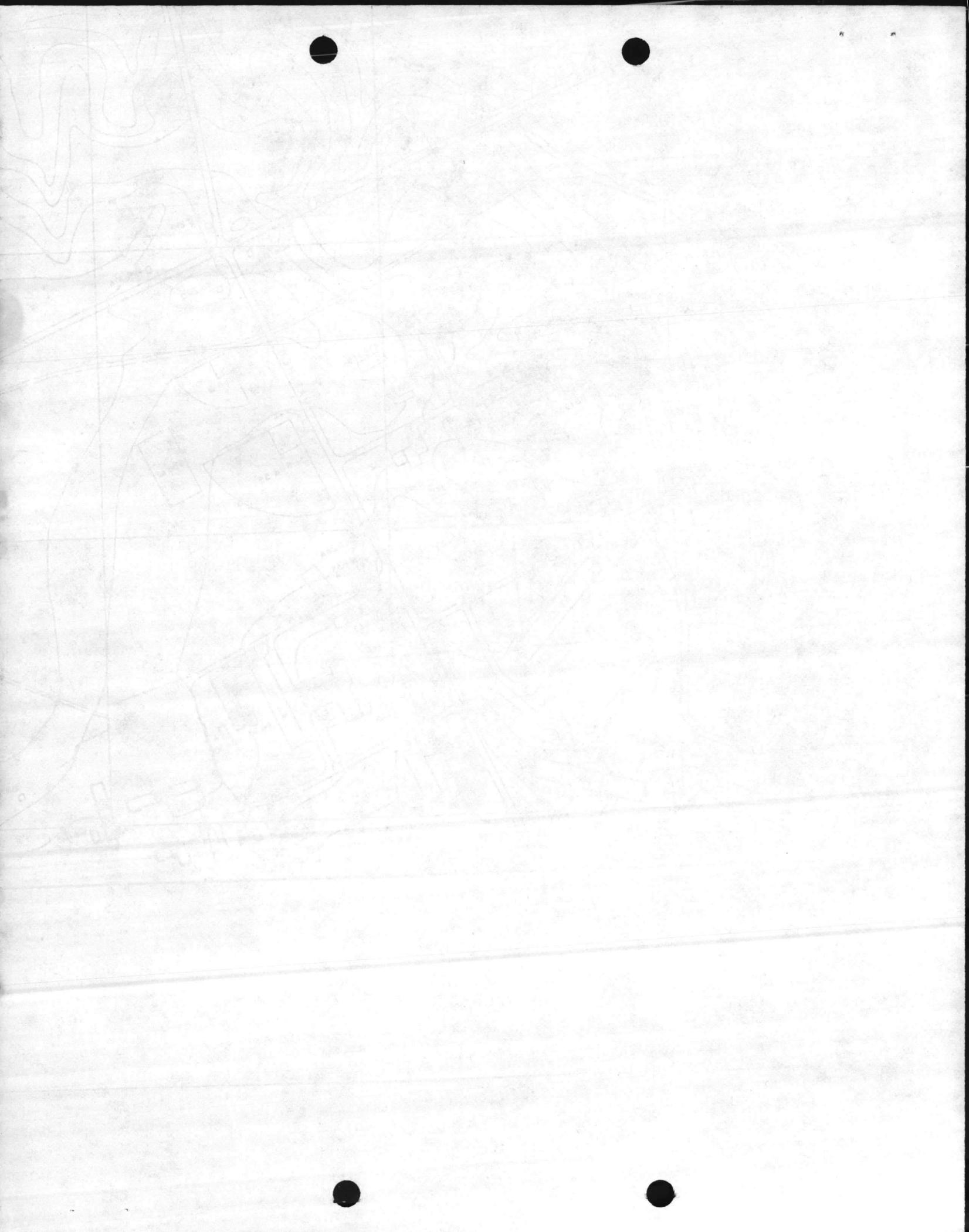
SITE NO. 2 - Maintenance BB-51

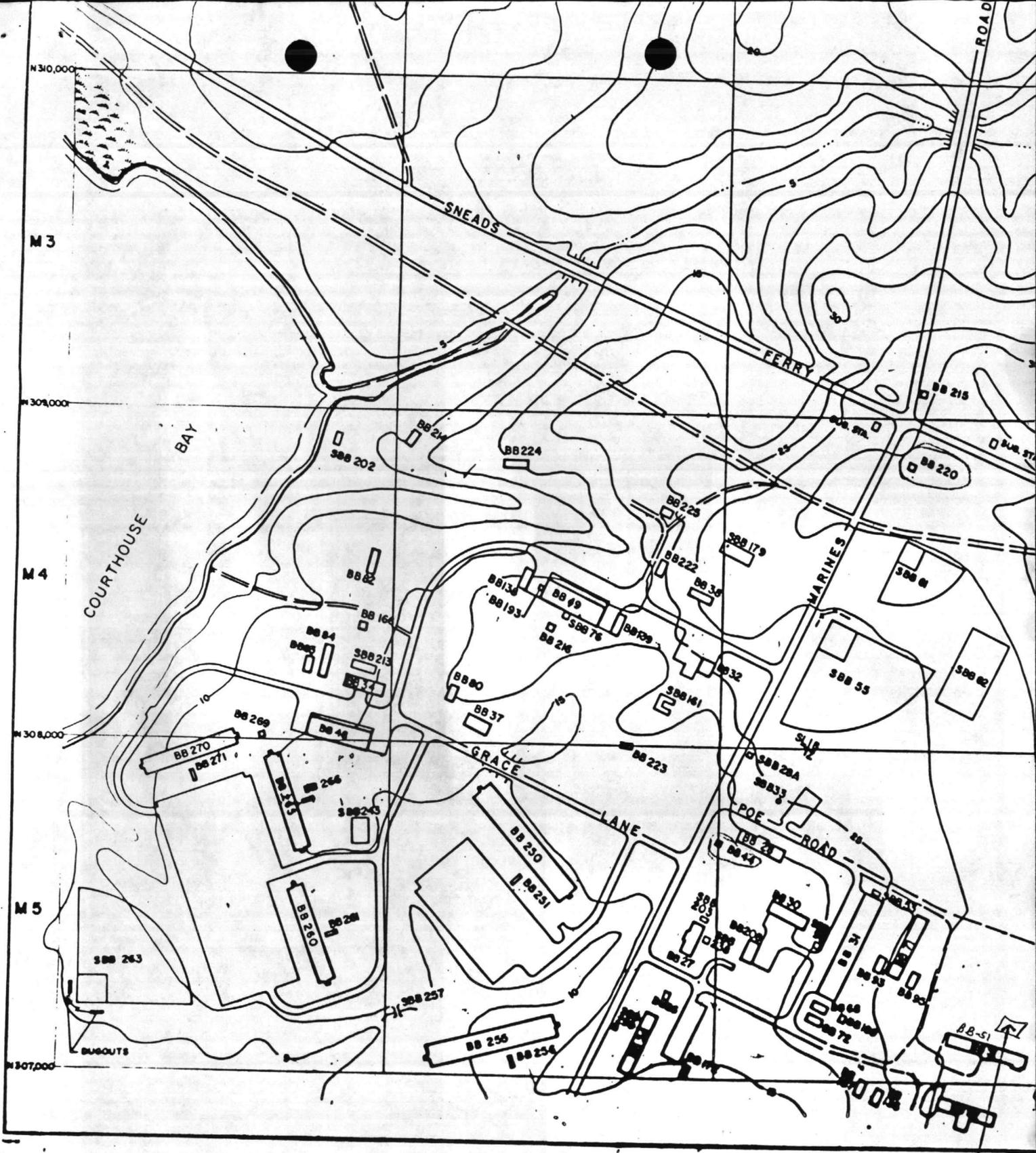
GENERATES - Waste Oil, Electrolyte & Solvents

SITE NO. 3 - Utilities Instruction Company BB-294

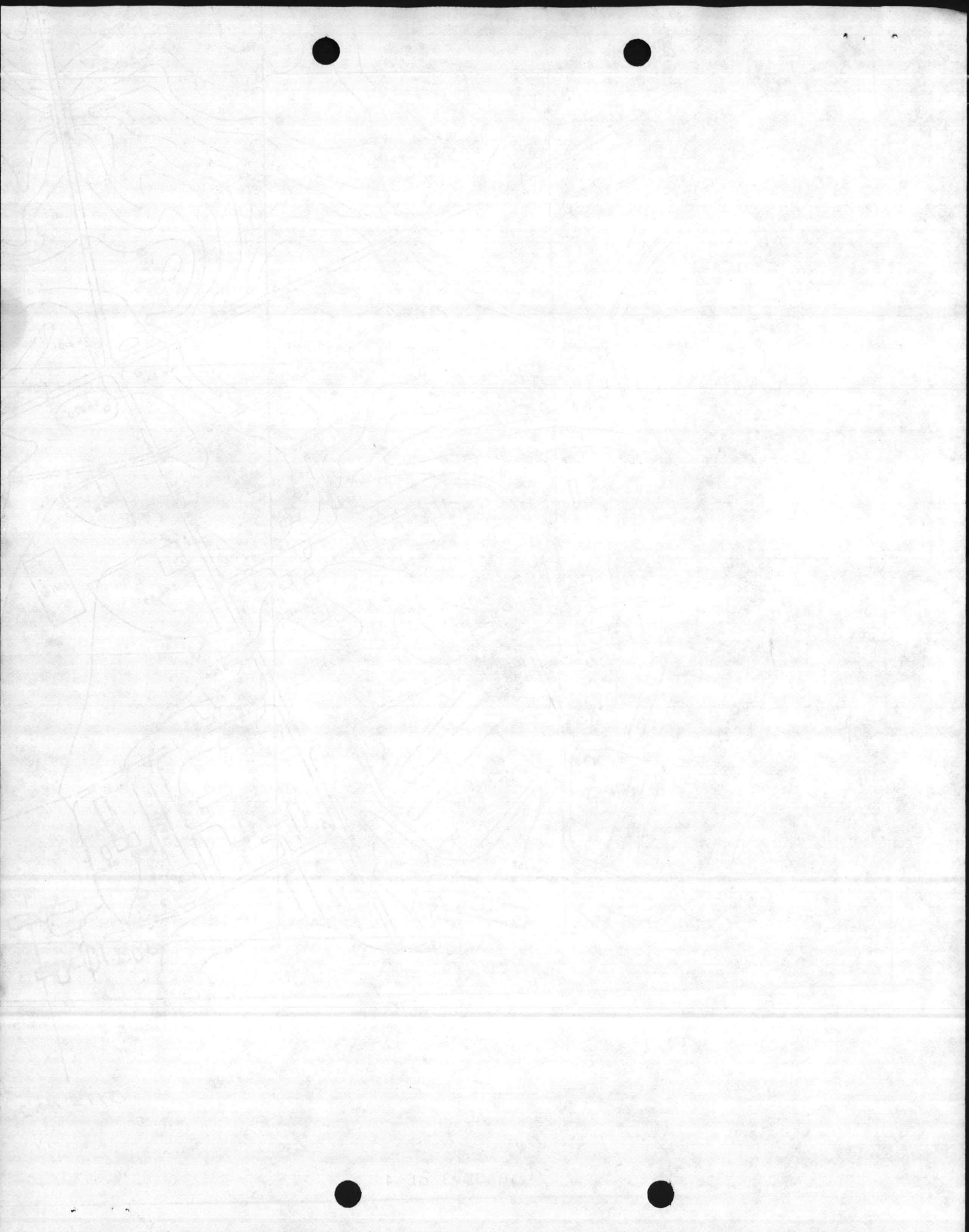
GENERATES - Solvents & Waste Oil

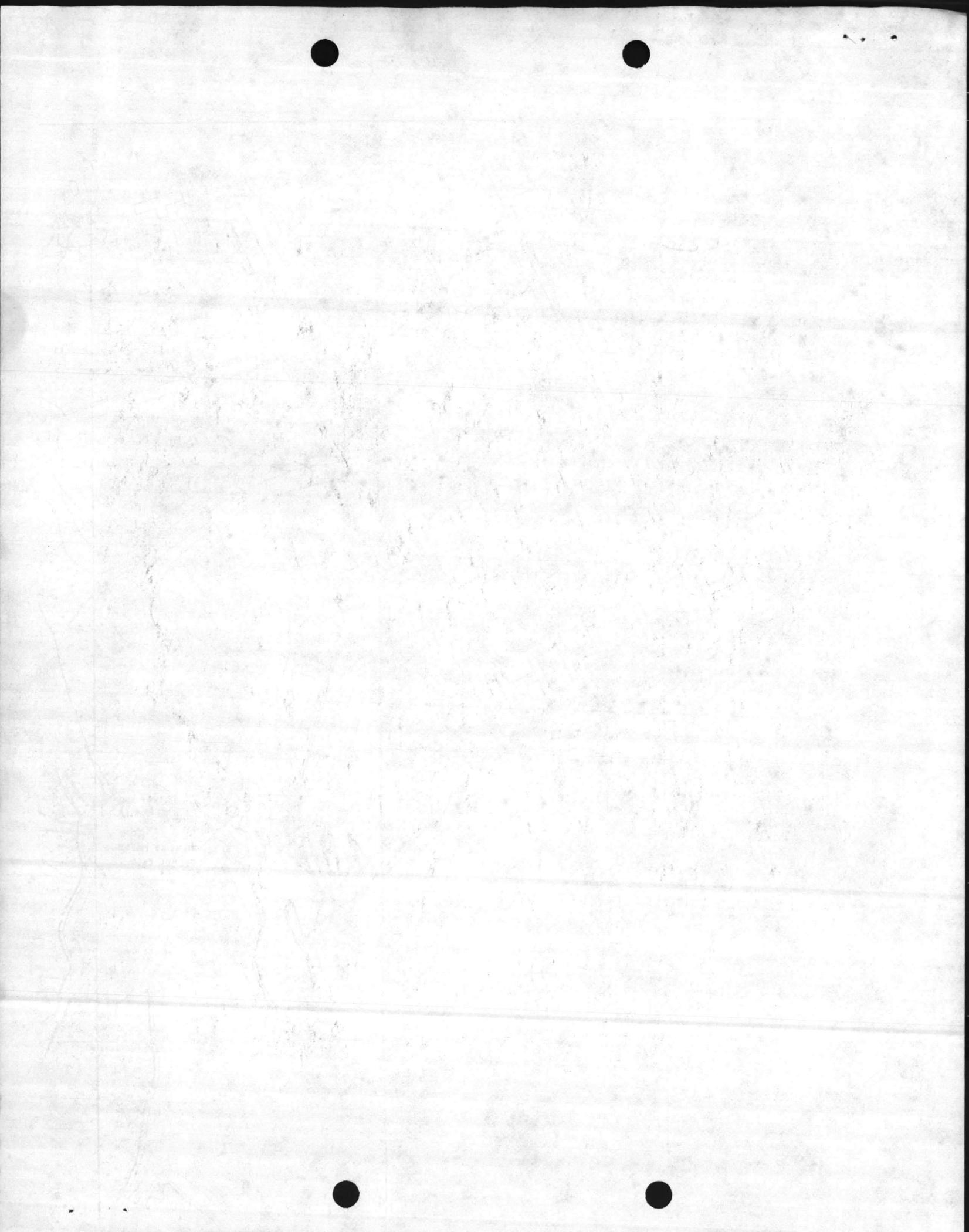






SITE No. 2





TO: AC/S FACILITIES

FROM: DIRECTOR, NREAD

SUBJ: HW INSPECTION, 3 NOV 86, MC ENGINEERS SCHOOL

VIOLATIONS NOTED

- HOLE IN DRUM OF HW Ref. CG Ltr 1920052 Sep 85
- NO TRNG RECORDS AT ARMORY Ref. B.O. 5740.5 40 CFR.

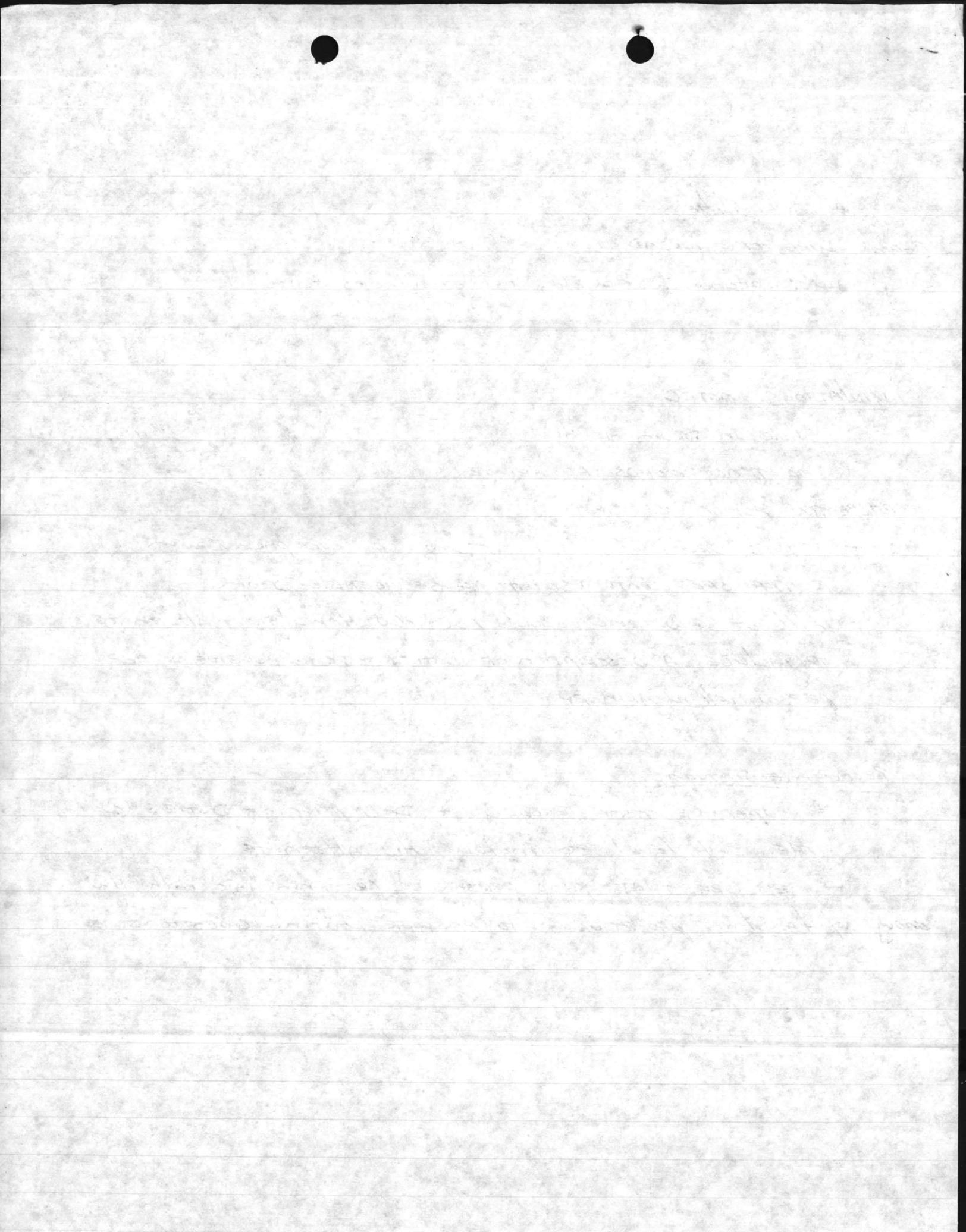
CORRECTIVE ACTION REQUIRED

- PLACE DRUM w/ HOLE in IT INTO AN OVERPACK DRUM OR TRANSFER CONTENTS INTO A SERVICEABLE DRUM
- FILL OUT HW TRNG RECORD FOR HW HANDLER + ALTERNATE TO INCLUDE A DESCRIPTION OF DUTIES + TRNG RECEIVED FOR PERSONNEL @ ARMORY

RECOMMENDATIONS

- UPGRADE TRNG RECORDS + DESCRIPTION OF DUTIES @ THE 3-4 LEVEL TO INCLUDE HIS ALTERNATE.
- ENSURE THAT SHOP PERSONNEL ARE FAMILIAR WITH HW ENOUGH w/ HANDLING PROCEDURES TO ANSWER ROUTINE QUESTIONS. ~~HE~~

Ref = Message ← CG Ltr
1920052 Sep 84



HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 3 NOV 86

1. Facility being Inspected: MLES
2. Organization in Charge: _____
3. Inspection Participants/Phone Number: CAPT. MILES (7570)
LT. MCNUTT (7528)
4. Description of HW Streams: WASTE ELECTROLYTE, small
QUANTITIES OF WASTE DRY CLEANING SOLVENT
ARMORY IS THE ONLY PLACE WHICH HAS NOT GOTTEN ITS SOLVENT ON
A SAFETY-K/EGEN CONTRACT
5. Are records of HW generation consistent with HW streams? YES
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 YES
 - (2) Applicable Base Orders YES
 - (3) Types of HW Handled YES
 - (4) Proper Containers YES
 - (5) Proper Labeling YES
 - (6) Weekly HW Inspections YES
 - (7) HW Turn-in Procedures YES
 - (8) Health and Safety YES
 - (9) Spill Reporting Procedures YES
 - (10) Spill Response Duties YES
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? YES

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WASTE RECYCLING UNIT

QUANTITIES OF WASTE DRY CLEANING SOLVENT

WASTES IS THE ONLY PLACE WHICH HAS NOT BEEN RECYCLED OR

RECYCLED - RECYCLED

YES

NO

NO

YES

YES

YES

YES

YES

YES

YES

YES

YES

NO

NO

NO

YES

YES

100

100

100

For help in the use of this book see the instructions

Draw (2) or (3) lines

INSPECTION FORM FOR HAZARDOUS WASTE HANDLING AND STORAGE AREAS

Name of Facility: BB-49 ARMORY

Name/Title OIC: MSGT BENIE Supply CHIEF

AREA OF CONCERN	YES	NO	CORRECTIVE ACTION NEEDED (use back of page to log action taken)
<p><u>A. CONDITION OF CONTAINERS</u></p> <p>1. Are containers closed</p> <p>2. Are containers leaking</p> <p>3. Are containers bulging</p> <p>4. Are containers collapsed</p> <p>5. Are containers corroded</p> <p>6. Are containers over-filled</p> <p>7. Other problems present</p>			<p>GENERATE SMALL AMOUNTS OF MINERAL SPIRITS FROM SOLVENT VATS ON AN INFREQUENT BASIS.</p> <p>NO HW ON HAND</p>
<p><u>B. LABELING AND MARKING</u></p> <p>1. Are HW labels in place</p> <p>2. Are HW labels filled out</p> <p>3. Are hazards (i.e., flammable, corrosive, etc.) labels or markings adequate</p>			
<p><u>C. Are HWS being disposed of by deadlines</u></p>			
<p><u>D. SECURITY AND EMERGENCIES</u></p> <p>1. Is access limited to authorized personnel only</p> <p>2. Is emergency response information posted</p> <p>3. Supplies and equipment readily available</p>			

DATE: 3 NOV 86

SIGNATURE:

e. Corrective Action Recommended:

f. Sketch showing location of Facility:

INSPECTION FORM FOR HAZARDOUS WASTE HANDLING AND STORAGE AREAS

Name of Facility: BR-294 UTILITIES INSTRUCTION CO.
 Name/Title OIC: GYSGT ORTIZ (7145)

AREA OF CONCERN	YES	NO	CORRECTIVE ACTION NEEDED (use back of page to log action taken)
<p><u>A. CONDITION OF CONTAINERS</u></p> <p>1. Are containers closed</p> <p>2. Are containers leaking</p> <p>3. Are containers bulging</p> <p>4. Are containers collapsed</p> <p>5. Are containers corroded</p> <p>6. Are containers over-filled</p> <p>7. Other problems present</p>			<p>NO HW PRESENT. GENERATE SMALL AMOUNT OF WASTE MINERAL SPIRITS WHEN CLEANING UP PAINT BRUSHES</p>
<p><u>B. LABELING AND MARKING</u></p> <p>1. Are HW labels in place</p> <p>2. Are HW labels filled out</p> <p>3. Are hazards (i.e., flammable, corrosive, etc.) labels or markings adequate</p>			
<p><u>C. Are HWs being disposed of by deadlines</u></p>			
<p><u>D. SECURITY AND EMERGENCIES</u></p> <p>1. Is access limited to authorized personnel only</p> <p>2. Is emergency response information posted</p> <p>3. Supplies and equipment readily available</p>			

DATE: 3 NOV 86

SIGNATURE:

e. Corrective Action Recommended:

f. Sketch showing location of Facility:

INSPECTION FORM FOR HAZARDOUS WASTE HANDLING AND STORAGE AREAS

Name of Facility: BB-51 MAINTENANCE FR.

Name/Title OIC: Lt. MCNUH (7528)

AREA OF CONCERN	YES	NO	CORRECTIVE ACTION NEEDED (use back of page to log action taken)
<u>A. CONDITION OF CONTAINERS</u>	SEE	A7	
1. Are containers closed			
2. Are containers leaking		✓	
3. Are containers bulging		✓	
4. Are containers collapsed		✓	
5. Are containers corroded		✓	
6. Are containers over-filled		✓	
7. Other problems present	✓		DRUM OF TRICHLORO TRIFLUOROETHANE with hole in top
<u>B. LABELING AND MARKING</u>			
1. Are HW labels in place	✓		
2. Are HW labels filled out	✓		
3. Are hazards (i.e., flammable, corrosive, etc.) labels or markings adequate	✓		
<u>C. Are HWs being disposed of by deadlines</u>	✓		
<u>D. SECURITY AND EMERGENCIES</u>			
1. Is access limited to authorized personnel only		✓	IT'S LIMITED TO AUTHORIZED PERSONNEL BUT THERE IS NO FENCE OR OTHER MEANS OF EXCLUDING PERSONNEL FROM STORAGE PAD. ELECTROLYTE IS STORED IN THE BATTERY SHOP
2. Is emergency response information posted	✓		
3. Supplies and equipment readily available	✓		

DATE: 3 NOV 86

SIGNATURE:

e. Corrective Action Recommended:

f. Sketch showing location of Facility: