

Memorandum

le 241/1

DATE: 15 January 1986

FROM: Supervisory Ecologist

TO: Supervisory Chemist

SUBJ: HAZARDOUS WASTE (HW) SAMPLING

Ref: (a) BO 6240.5

1. This is to advise that Mr. Danny Becker, Environmental Protection Specialist, has been assigned to assist you with the subject work required by the reference. Mr. Becker has adequate training in safe handling of hazardous materials/waste, which will allow us to avoid the safety issues which have arisen recently regarding the participation of the GS-6/GS-7 Physical Science Technicians in this type work. Additionally, this will allow Mr. Becker to gain insight into this aspect of HW management. Work will be scheduled in advance ^{AT}~~of~~ times mutually acceptable to you and Mr. Becker.

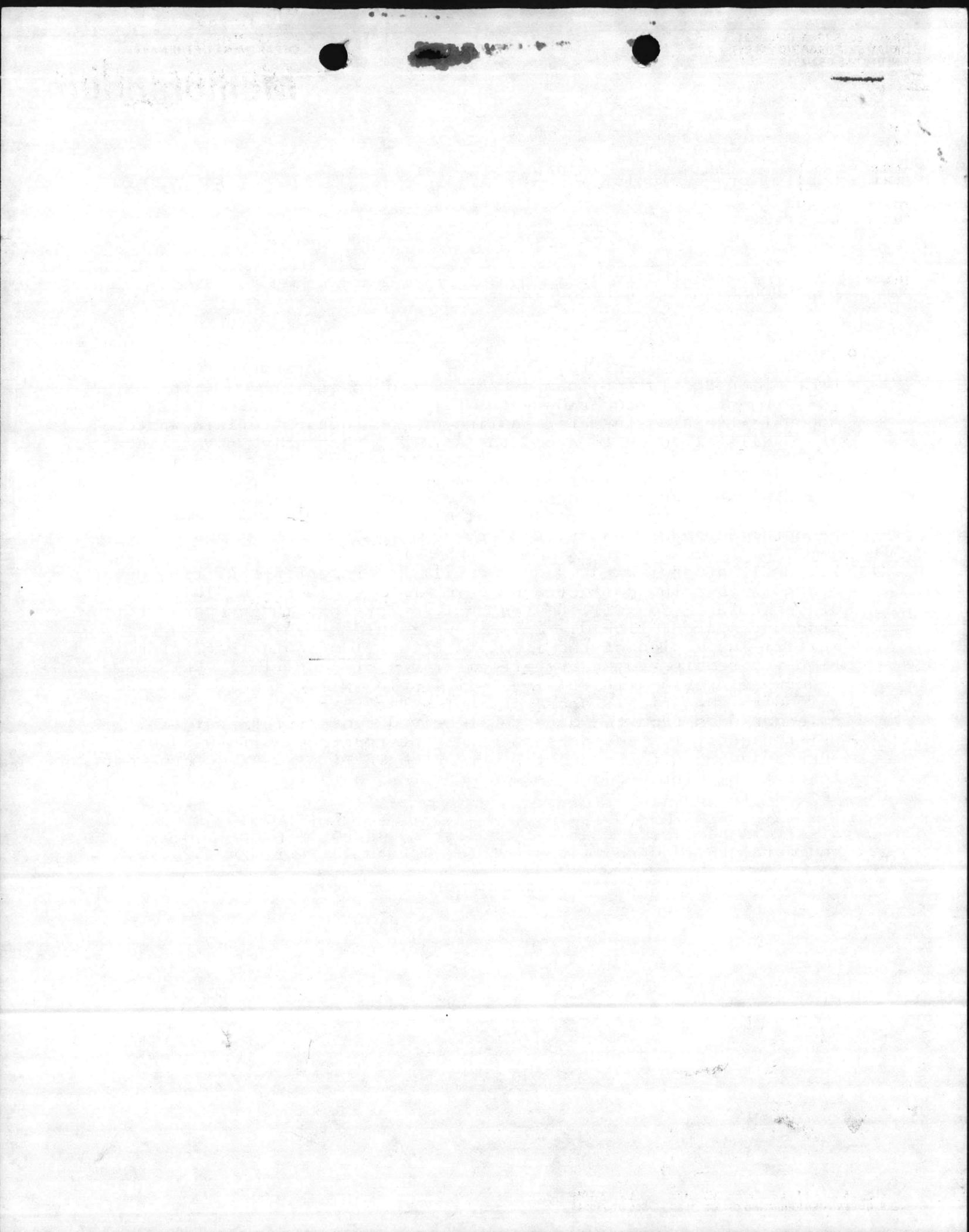
2. Until otherwise advised, you will be present at any time when a sample is being collected which meets the general definition of "unknown". You will be responsible for ensuring proper safety procedures are followed. Mr. Becker should be able to make the initial inspection of the items to be sampled and gather information you require to ensure efficient use of your time. Unless otherwise provided in writing, all samples will be collected and mailed to commercial laboratory not later than fourteen (14) calendar days from the date you received request for analysis. Written analysis should be in-hand, interpreted and forwarding correspondence to requestor prepared in final draft form not later than thirty (30) calendar days from date you received request for analysis.

3. It is requested that all requests on-hand be processed and data provided requestor not later than 28 February 1986.

D.D. Sharpe

D. D. SHARPE

Copy:
EnvProSpecialist
Dir, NREAD



PART C - WASTE CHARACTERISTICS.C-1. CHEMICAL AND PHYSICAL ANALYSES.

a. Identification during Procurement.

Identification of all HM procured for use aboard MCB is provided through published information in the supply system. As previously described in paragraph B-1b(3), HM are procured and shipped under Federal contracts and issued through established supply channels. Federal procurement rules require all HM must be labeled to indicate the contents. Shipments of HM, whether by military or common carrier, must conform to DOT labeling and manifesting requirements.

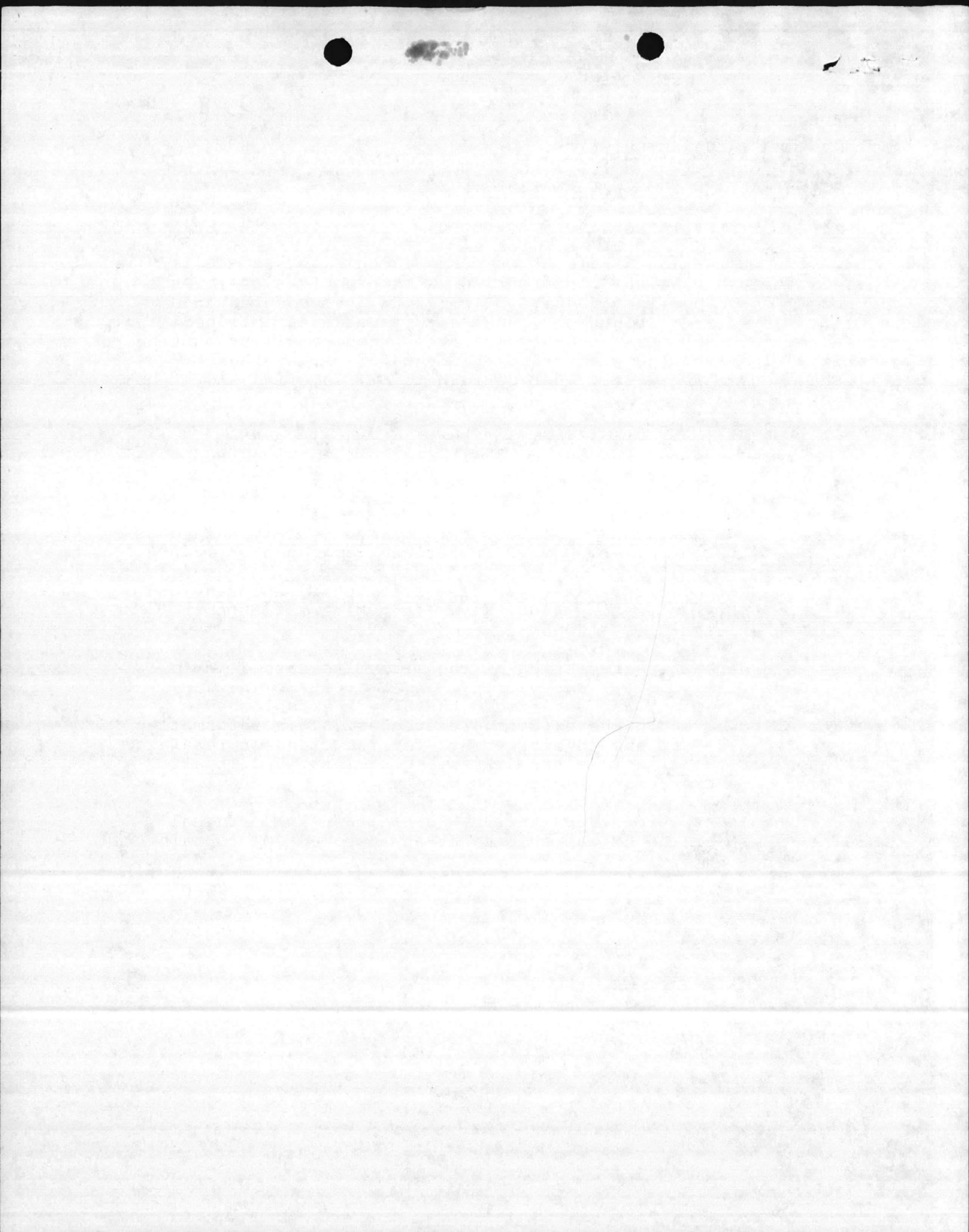
In addition to the label information, supply system managers have detailed references available to determine the hazardous physical and chemical components of supply items. Examples are:

DOD Hazardous Materials Information System, Hazardous Item Listing, DOD 6050.5-L, Nov 82 (reference data on over 17,000 products).

Consolidated Hazardous Item List (CHIL), Storage and Handling, NAVSUP Publication 4500, Navy Fleet Material Support Office, Mechanicsburg, PA, 17055. -

b. Hazardous characteristics of the materials turned in to DPDO include flammability, corrosivity, and toxicity. The hazardous designations are determined based on the published classification given in the existing references. This information is then provided with any advertisements for recycling or resale or any subsequent solicitations for disposal contracts, and is also maintained for RCRA record keeping purposes.

c. Containers which store the HM/W are either the original container in which the HM was shipped or an approved DOT container for repackaged items.



C-2 - WASTE ANALYSES

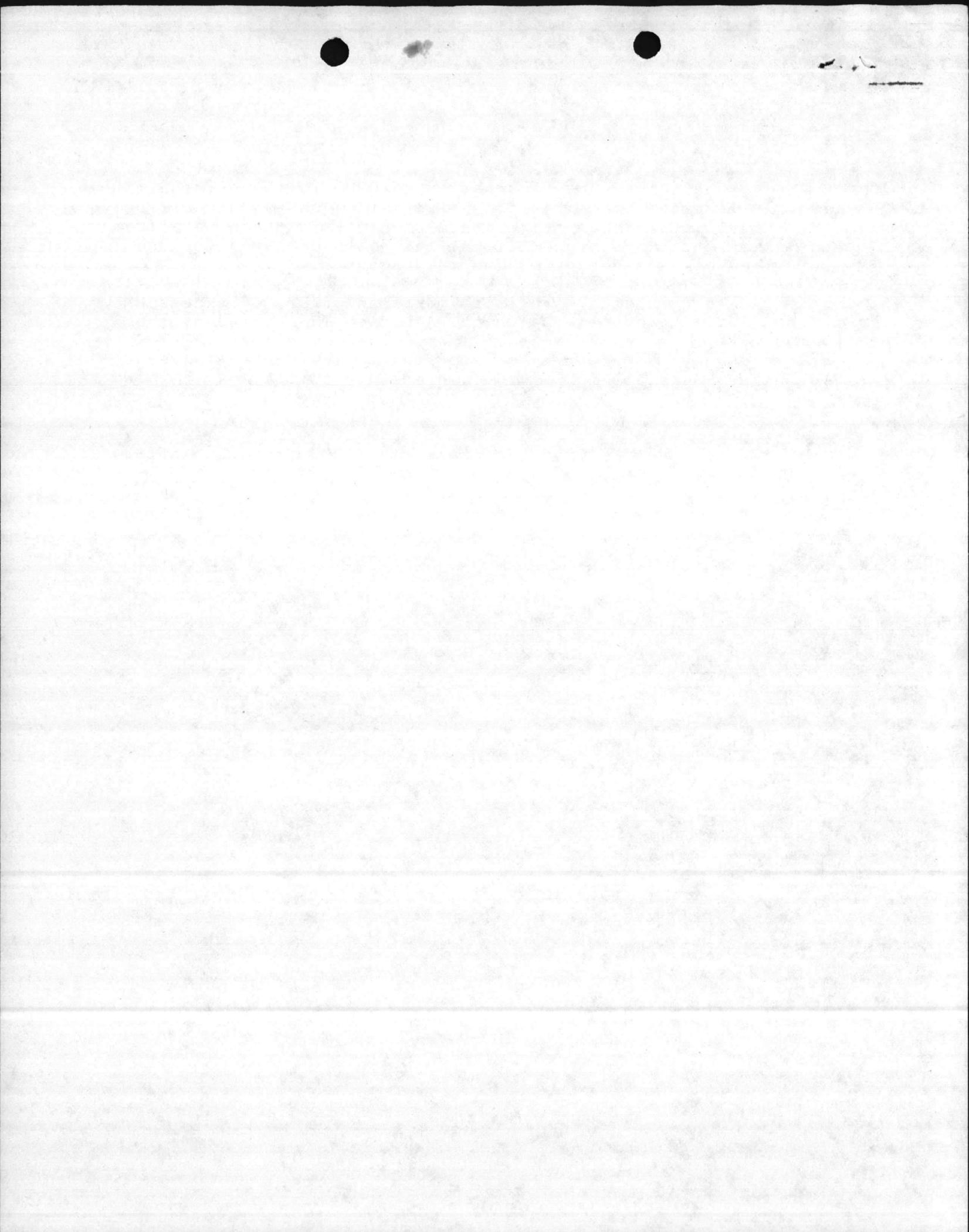
a. For HM which have been turned in to DPDO in the original shipping cartons, the identification is provided based on published data in supply system documents. These documents contain data from GSA and DLA on hazardous properties of materials procured for use by Federal agencies as described in paragraph B-1b(3).

b. For used hazardous materials, mixtures of HM, or excess HM with illegible container labels which cannot be identified by the generating unit, the identification is provided by commercial analyses through an EPA-certified laboratory. The Waste Analysis Plan for these materials is provided on enclosure (11).

c. Wastes Generated Off-Site:

No HM are accepted for storage at the DPDO from generating locations outside the MCB and MCAS(H), New River.

d. Ignitable, Reactive or Incompatible Waste: Identification of these characteristics of HM being stored is provided as previously described.



DEPARTMENT OF THE NAVY
Memorandum

NREAD/DDS/th
5040

DATE: 24 August 1983

FROM: Supervisory Ecologist

TO: Supervisory Chemist

SUBJ: Hazardous Material/Waste Management; safety and health considerations of

Ref: (a) BO 6240.5

Encl: (1) Hazardous Waste Analysis Plan

1. On 9 August 1983, a minor accident involving the splashing of a hazardous liquid during sample collection by the Environmental Protection Specialist. The enclosure developed pursuant to the reference assigns responsibility for gathering the subject samples to the Water Quality Control Laboratory personnel under the direction of the Supervisory Chemist.
2. Supervisory Chemist will develop written procedures for various types of routine sampling anticipated to fulfill NREAD responsibilities related to hazardous material/waste management and disposal. Procedures will address subject considerations. Necessary safety and protective equipment will be obtained and made available. Supervisory Chemist will ensure adequate training is provided to laboratory personnel in sampling procedures and equipment. Supervisory Chemist will personally supervise taking of non-routine samples posing a significant hazard to personnel taking sample.

Danny D. Sharpe

DANNY D. SHARPE

Copy to:
Environmental Protection Specialist

TO : [Illegible]

DATE: [Illegible]
SUBJECT: [Illegible]

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HAZARDOUS WASTE ANALYSIS PLAN

for

MARINE CORPS BASE, CAMP LEJEUNE, NORTH CAROLINA

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

NAVAL REGIONAL MEDICAL CENTER, CAMP LEJEUNE, NORTH CAROLINA

NAVAL REGIONAL DENTAL CENTER, CAMP LEJEUNE, NORTH CAROLINA

DEFENSE PROPERTY DISPOSAL OFFICE (DPDO), CAMP LEJEUNE, NORTH CAROLINA

Prepared By

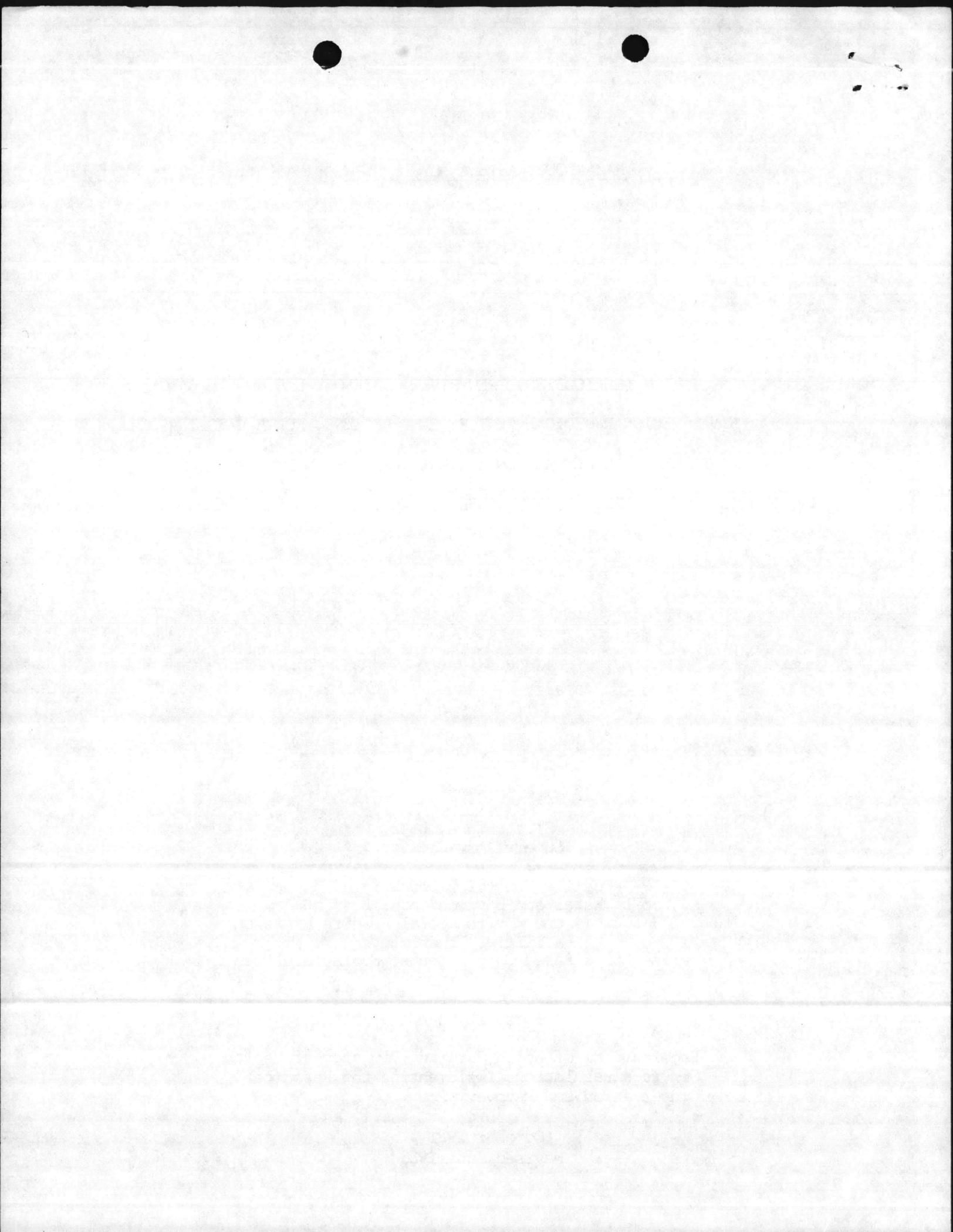
Elizabeth A. Betz
Supervisory Chemist

Quality Control Laboratory
Soil, Water and Environmental Branch
Natural Resources and Environmental Affairs Division
Facilities Department
Marine Corps Base, Camp Lejeune, North Carolina

Pursuant to

Requirements of North Carolina Division of Health
Services regulations implementing the Resource
Conservation and Recovery Act

October 1981
Revised June 1983



HAZARDOUS WASTE ANALYSIS PLAN

This plan describes the procedures for sampling and for chemical and physical analysis of hazardous materials and hazardous waste stored at the Camp Lejeune complex awaiting transportation to an appropriate disposal site, generally a commercial facility. In most cases, the identity of the waste will be known in sufficient detail to preclude costly analytical services. Generating organization certification may be used in lieu of such analysis when feasible, provided Preservation, Packaging and Packing is provided adequate information to certify shipment on public highway and officer with responsibility for disposal has sufficient information to properly store and dispose of the item(s) in accordance with Base Order 6240.5. The waste analysis must provide information required to implement the procedures developed to properly store and transport hazardous materials and hazardous waste. The analysis will be repeated as necessary to assure it is accurate and up-to-date. This plan provides the following:

1. Sampling Methods
2. Parameters Selected
3. Test Methods
4. Frequency of Sampling

In cases where the identity of the waste cannot be adequately determined by generating unit, sampling and analysis will be done. The Hazardous Material Disposal Coordinator for generating organization will contact the Supervisory Chemist, Soil, Water and Environmental Branch, Natural Resources and Environmental Affairs Division, Assistant Chief of Staff, Facilities, to arrange for the sampling. The Base Maintenance Division has established a Standing Job Order Number to be used to pay for the costs incurred in sampling and analysis for hazardous waste.

The Quality Control Laboratory personnel will conduct the sampling, under the direction of the Supervisory Chemist. The methods and equipment will vary with the form and consistency of the waste to be sampled. Table 1 lists the possible sample types and the references for the sample methods to be used. At the time of the sampling, the Laboratory will affix a sample number to the waste container which will correspond to the sample sent for analysis. The officer having physical custody of the sampled item(s) will ensure that the item(s) are not tampered with. Whenever possible, sampling will be delayed until the items are transported to the base long-term hazardous waste storage facility. The Laboratory analysis reports will be provided to the Hazardous Material Disposal Coordinator via the Director, Natural Resources and Environmental Affairs Division. Analysis will be by qualified Commercial Laboratory. Quality control will be ensured by Supervisory Chemist.

Unless specifically requested by DPDO or other authorized official, only the minimum level of analysis, as required to ensure compliance with RCRA storage and DOT regulations will be run. Parameters to be measured will be specified by the Supervisory Chemist. Procurement contracts for laboratory analysis will specify that all these samples sent for analysis are for compliance with Federal regulations and therefore only "certified" laboratories and procedures approved by regulatory agencies are acceptable.

The wastes generated aboard the Camp Lejeune complex are generated in batches, as waste containers fill up. Therefore, sampling will be done, as needed, on each batch, as it is awaiting final disposition.

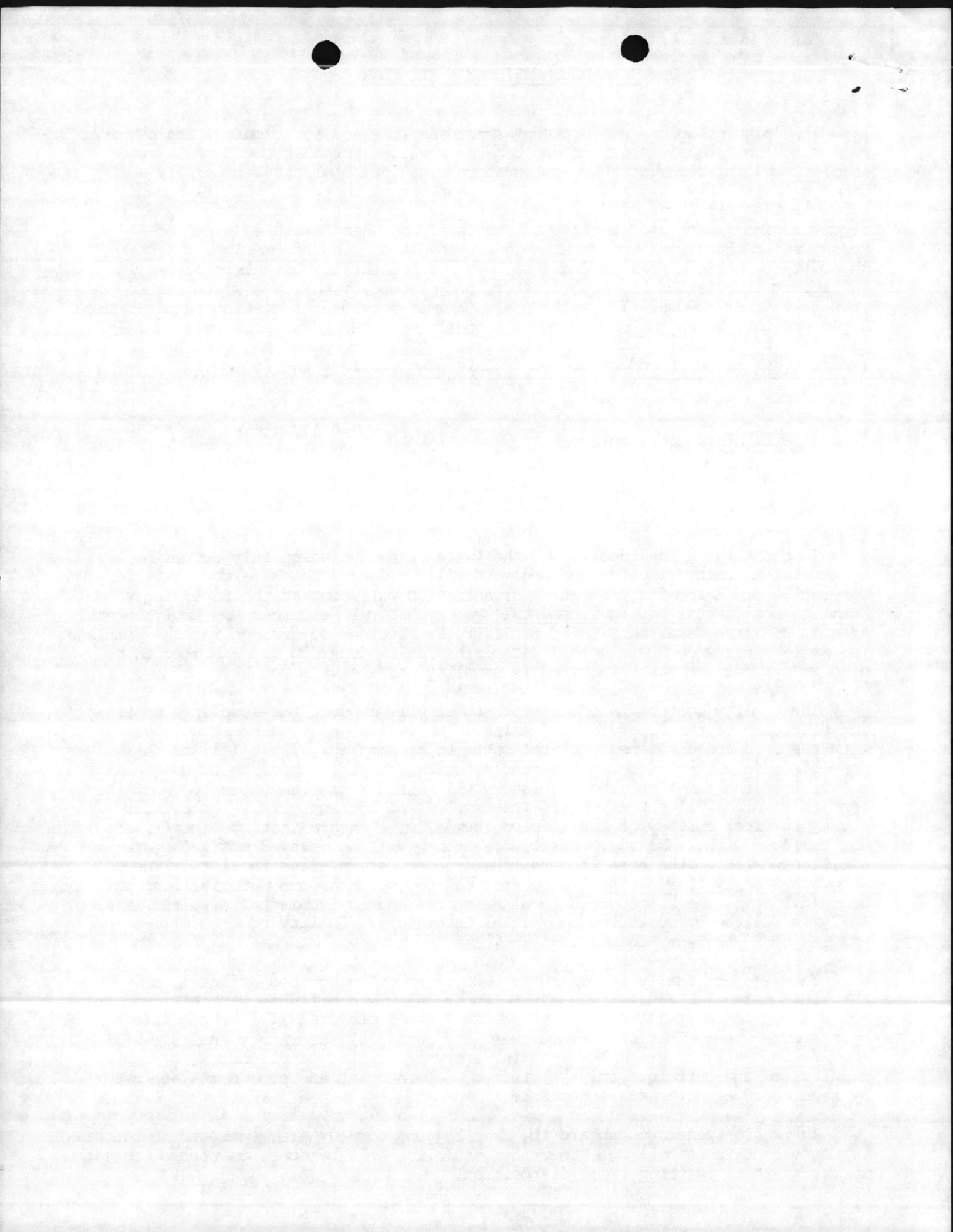
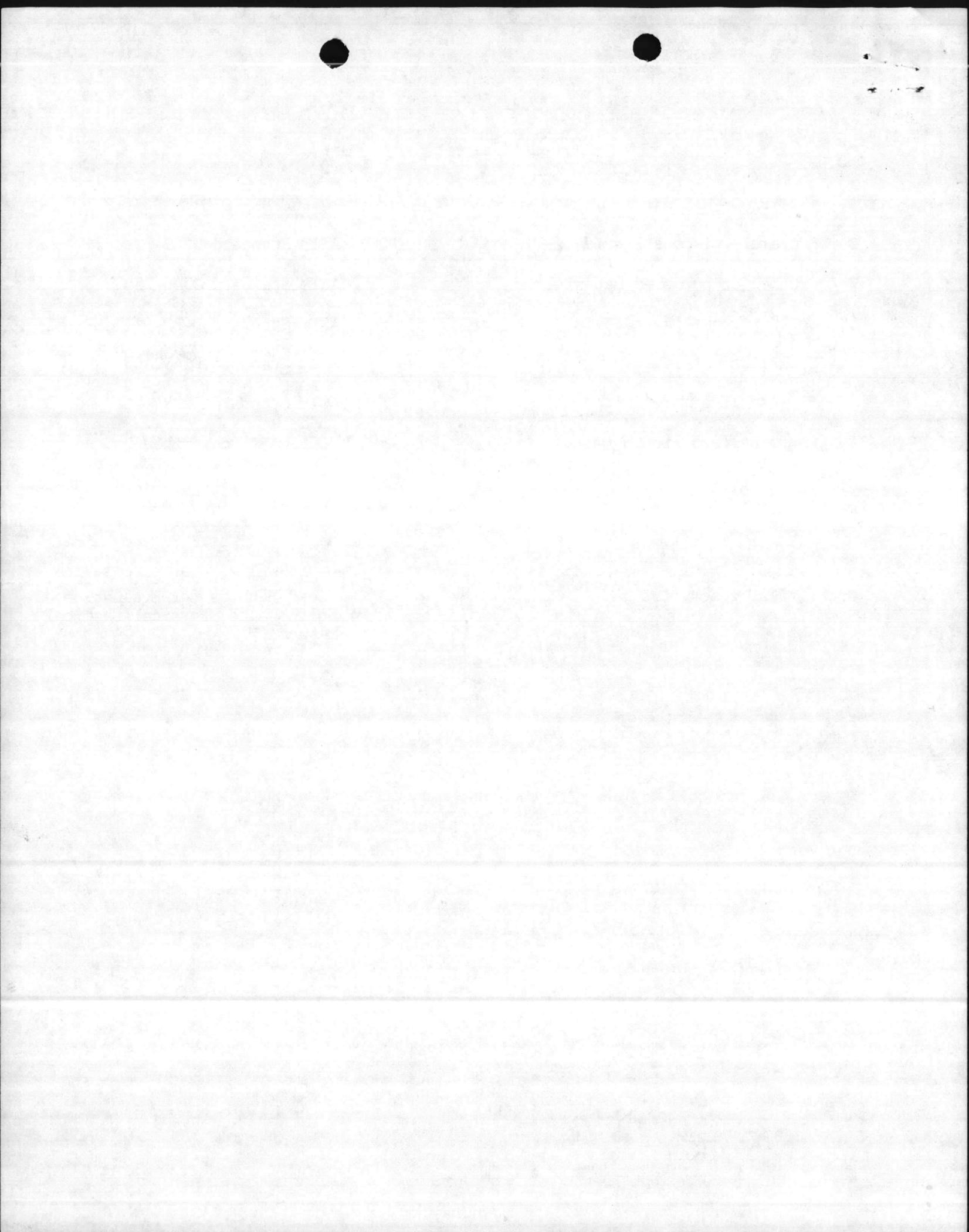


TABLE 1

SAMPLING METHODS

<u>TYPE OF WASTE</u>	<u>GUIDE REFERENCE</u>
1. Extremely viscous liquid	ASTM Standard D140-70
2. Crushed or powdered material	ASTM Standard D346-75
3. Soil or rock-like material	ASTM Standard D420-69
4. Soil-like material	ASTM Standard D1452-65
5. Fly Ash-like material	ASTM Standard D2234-76
6. Containerized liquid waste	"COLIWASA" described in "Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods," EPA or Samplers & Sampling Procedures for Hazardous Waste Streams, EPA
7. Liquid waste in pits, ponds, lagoons and similar reservoirs	"Pond Sampler" described in "Test Methods for Evaluation of Solid Waste, Physical/Chemical Methods."



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2.2

... TO THE ...

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CG MEMORANDUM

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A	B	C	D
NAME AND/OR DESCRIPTION OF THE ITEM	Dispose as HM	Dispose as HW	EPA HW Number
1. <u>Mineral Spirits and Stoddard Solvents:</u>			
(a) Unused	X		-
(b) Used or item not in usable condition		X	D001
2. <u>DS-2 Decontaminating Agent:</u>			
(a) Unused	X		-
(b) Used or item not in usable condition		X	D002
3. <u>Used Electrolyte</u>			
(a) Items which Base Maintenance will accept for disposal	X		N/A
(b) All other items		X	D 003
4. <u>Paint Strippers:</u>			
(a) Unused	X		-
(b) Used		X	D007
5. <u>Mercury from Meter Maintenance</u>	-	X	D009
6. <u>Photographic Chemical Wastes</u>	-	X	D011
7. <u>Spent Solvents containing one or more of the following: Tetra-chloroethylene; Trichloroethylene; Methylenechloride; 1,1,1-Trichloro-ethane; and Chlorinated Fluorocarbons (freon)</u>			
(a) When used as degreasers	-	X	F001
(b) When used as solvents or paint thinners	-	X	F002
8. <u>Spent non-Halgenated Solvents:</u>			
(a) Containing Acetone and/or Xylene	-	X	F003
(b) Containing Toulene and/or Methyl Ethyl Ketone	-	X	F005

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9. Stocks of the following chemicals will be disposed of as a hazardous waste if the item becomes unusable because of either or both of the following:

EPA
HW Number

- (a) Deterioration by age, use or exposure to heat, light, etc.
- (b) Become contaminated with foreign substance.

Unless otherwise specified below, items in usable condition will be turned in to DPDO as a hazardous material.

A. Acetone	
(1) if used as a solvent	F003
(2) otherwise	U002
B. DDT (always dispose of as a HW)	U061
C. 1,1 Dichloroethane	U076
D. Dichloromethane (Methylene Chloride)....	
(1) if used as a degreaser	F001
(2) if used as a solvent	F002
(3) otherwise	U080
E. Formaldehyde	U122
F. Lindane	U129
G. Kepone	U142
H. Mercury	
(1) Metallic wastes from meter maintenance ..	D009
(2) Otherwise	U151
I. Methyl Ethyl Ketone	
(1) if used as a solvent	F005
(2) otherwise	U159
J. Phenols	U188
K. Tetrachloroethane (Tetrachloroethylene)	
(1) if used as a degreaser	F001
(2) if used as solvent	F002
(3) otherwise	U210
L. Toluene	
(1) if used as solvent	F005
(2) otherwise	U220

HW Number

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M. 1,1,1-Trichloroethane

- (1) if used as degreaser F001
- (2) if used as solvent F002
- (3) otherwise U226

N. Trichloroethene (Trichloroethylene)

- (1) if used as degreaser F001
- (2) if used as solvent F002
- (3) otherwise U228

O. Xylene

- (1) if used as solvent F003
- (2) otherwise U239

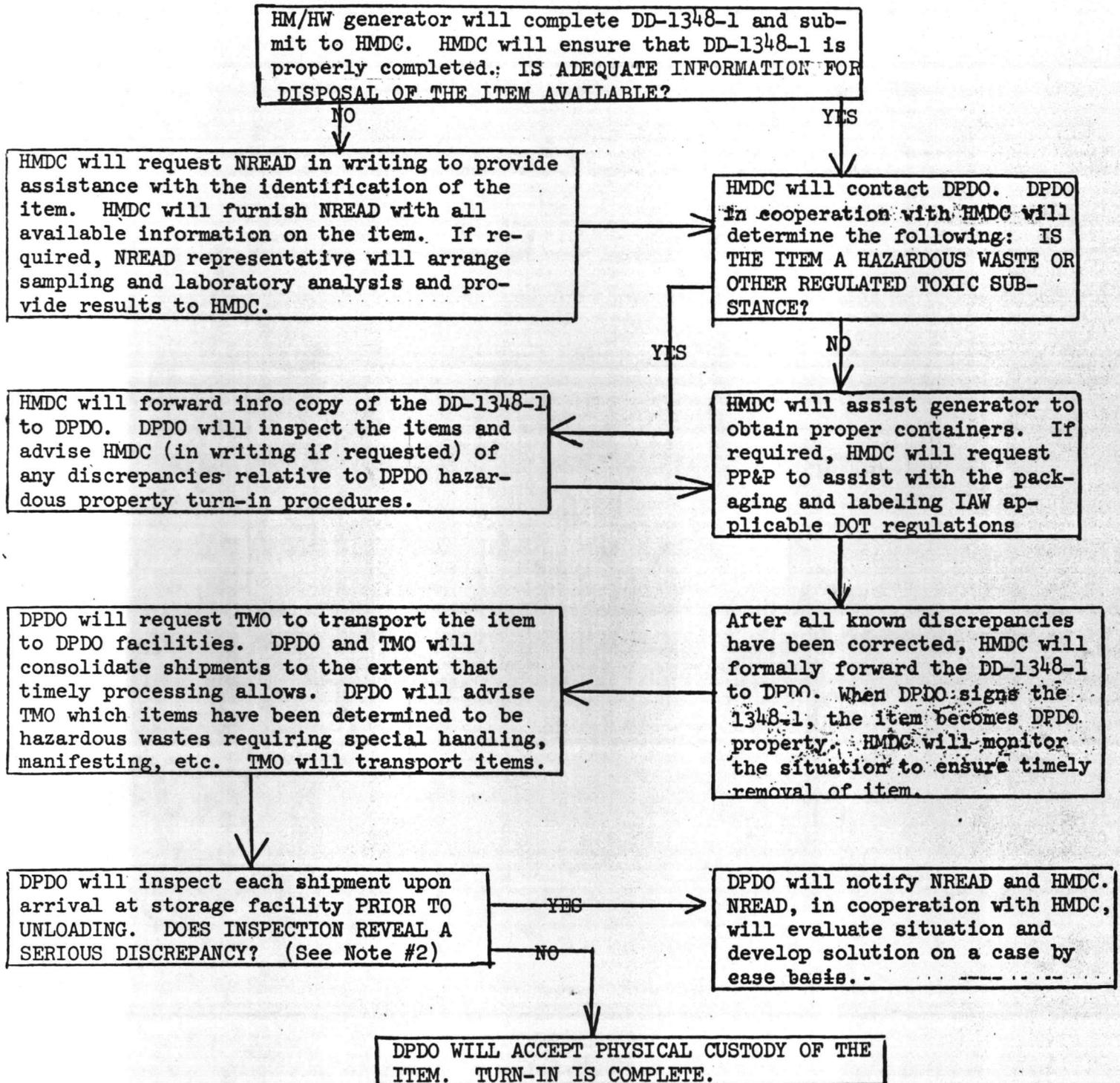
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**PROCEDURES FOR TURN-IN OF HAZARDOUS MATERIALS, HAZARDOUS WASTE
TO DPDO, CAMP LEJEUNE (SEE NOTE #1)**



Note No. 1: Abbreviations used above are

- DOT - Department of Transportation
- DPDO - Defense Property Disposal Office, Camp Lejeune
- HMDC - Hazardous Material Disposal Coordinator
- NREAD - Natural Resources & Environmental Affairs Division, MCB
- PP&P - Preservation, Packaging and Packing, 2d FSSG
- TMO - Traffic Management Officer, AC/S Logistics, MCB

Note No. 2: Items will not be unloaded without DPDO approval. DPDO will request Base Fire Department assistance if required per Contingency Plan.

1. The following information was obtained from the records of the Department of Health and Human Services, Federal Bureau of Investigation, Washington, D.C. 20535, on 11/15/81:

MMDC will contact BRDO, BRDC, and BRDG with HMDG will determine the following: IS THE ITEM A HAZARDOUS WASTE OR OTHER REGULATED TOXIC SUBSTANCE?

MMDC will contact BRDO, BRDC, and BRDG with HMDG will determine the following: IS THE ITEM A HAZARDOUS WASTE OR OTHER REGULATED TOXIC SUBSTANCE?

MMDC will assist generator to obtain proper container. HMDG will request that the generator label the container in accordance with regulations.

MMDC will assist generator to obtain proper container. HMDG will request that the generator label the container in accordance with regulations.

After all known dispersals have been corrected, HMDG will formally forward the DD-1348-1 to BRDO. When BRDO signs the DD-1348-1, the item becomes DQ. HMDG will monitor the situation to ensure timely removal of item.

After all known dispersals have been corrected, HMDG will formally forward the DD-1348-1 to BRDO. When BRDO signs the DD-1348-1, the item becomes DQ. HMDG will monitor the situation to ensure timely removal of item.

BRDO will notify HMDG and BRDC. HMDG, in cooperation with BRDO, will evaluate situation and develop solution on a case by case basis.

BRDO will notify HMDG and BRDC. HMDG, in cooperation with BRDO, will evaluate situation and develop solution on a case by case basis.

BRDO WILL ADVISE PHYSICAL COUNCIL OF THE RESULTS OF THIS REVIEW.

- BRDO - Training Officer, AEC's Logistics, WDC
 - BRDC - President, Training, AEC's Logistics, WDC
 - BRDG - National Research & Development, AEC's Logistics, WDC
 - HMDG - Hazardous Waste, AEC's Logistics, WDC
 - MMDC - Director, Training, AEC's Logistics, WDC
- Item will not be removed without BRDO approval. BRDO will request that the Department assistance if needed per Contingency Plan.

~~STATE Rep-~~
JAMES CARTER
733-2178
Env. Chemist

Betz - for info

1/27/84

DRAFT

MARINE CORPS BASE
Camp Lejeune, N.C.
NC6170022580

C-1 CHEMICAL AND PHYSICAL ANALYSES

40 CFR 270.14 as referenced in 10 NCAC 10F .0034(b)(4),
40 CFR 264.13(a) as referenced in 10 NCAC 10F .0032(c)

USE
HMIS

Provide information about the specific wastes handled at Camp Lejeune. Since you have existing publications, you may wish to send copied portions that deal with your particular waste streams. The information should include a complete list of stored wastes, a general description of each waste and its hazardous characteristics. It would also be helpful to know what operations produce these wastes.

Why??

Presumably, laboratory analyses have been performed in the past for wastes in your storage area. Please provide reports of laboratory results.

Please address the following questions:

1. What operation uses paint thinner as a degreasing agent? (You have listed it as F001).
2. Is your Stoddard Solvent contaminated with methylene chloride during an operation and if so, what is the operation?
3. What are the waste constituents in lithium batteries - lithium chloride, lithium hydroxide? Are there other constituents?
4. What are the constituents in the lacquer paint - ethyl alcohol, toluene, xylene, butyl acetate?

Note: These questions can be answered by providing the waste information and laboratory results requested above.

C-2 WASTE ANALYSIS PLAN

C-2a Parameters and Rationale

40 CFR 264.13(b)(1) as referenced in 10 NCAC 10F .0032(c)

F.P.C.

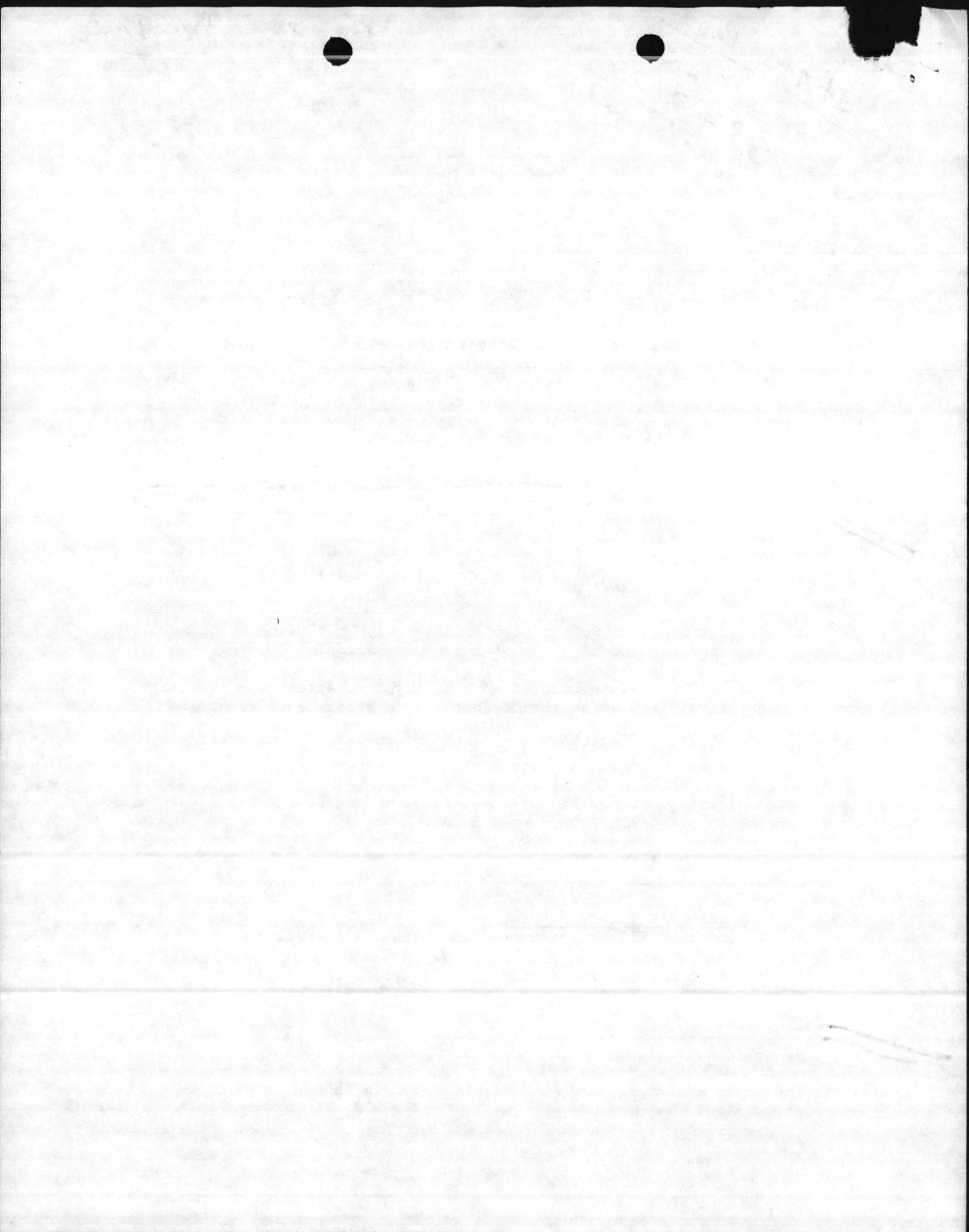
Provide an organized waste analysis plan that will itemize a list of parameters to be chosen for analysis of each individual waste.

C-2b Test Methods

40 CFR 264.13(b)(2) as referenced in 10 NCAC 10F .0032(c)

The waste analysis plan should state specific test methods to be used for various analyses.

Crossing
lab



D-1a(3) Secondary Containment System Design and Operation

Page 25 of your application states that Building TP-451 is used for receiving hazardous wastes for storage at Building TC-863. Please clarify the use of Building TP-451. Is it a temporary storage building through which all wastes are checked through? Why are wastes not taken directly to Building TC-863?

F-1a(3) Warning Signs

40 CFR 264.14(c) as referenced in 10 NCAC 10F .0032(c)

Clarify whether or not signs are visible from 25 feet and whether they are posted on all sides of the fence or just at entries.

F-2a General Inspection Requirements

40 CFR 270.14 as referenced in 10 NCAC 10F .0034(b)(4)
40 CFR 264.15(a) and (b) as referenced in 10 NCAC 10F .0032(c)

Camp Lejeune's inspection log sheet (Encl. 12) needs to incorporate the information found on page 30 of your Part B application. The log sheet does not identify the types of problems to look for during an inspection.

F-5a Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Waste

40 CFR 264.17a as referenced in 10 NCAC 10F .0032(c)

Indicate that the hazardous waste storage facility has "No Smoking" signs posted.

CONTINGENCY PLAN

G-1 General Information

40 CFR 264.52(d) as referenced in 10 NCAC 10F .0032(e)

Provide names, addresses and phone numbers of emergency coordinators. Even though your facility is unique in that it has a 24-hour emergency team on hand, your contingency plan must name individuals and state their authorization to act in the event of an emergency. Arrangements should also be made with Base Hospital and Military Police. They should be familiarized with the chemicals stored at your facility and they should be provided a copy of the contingency plan.

G-4a Notification

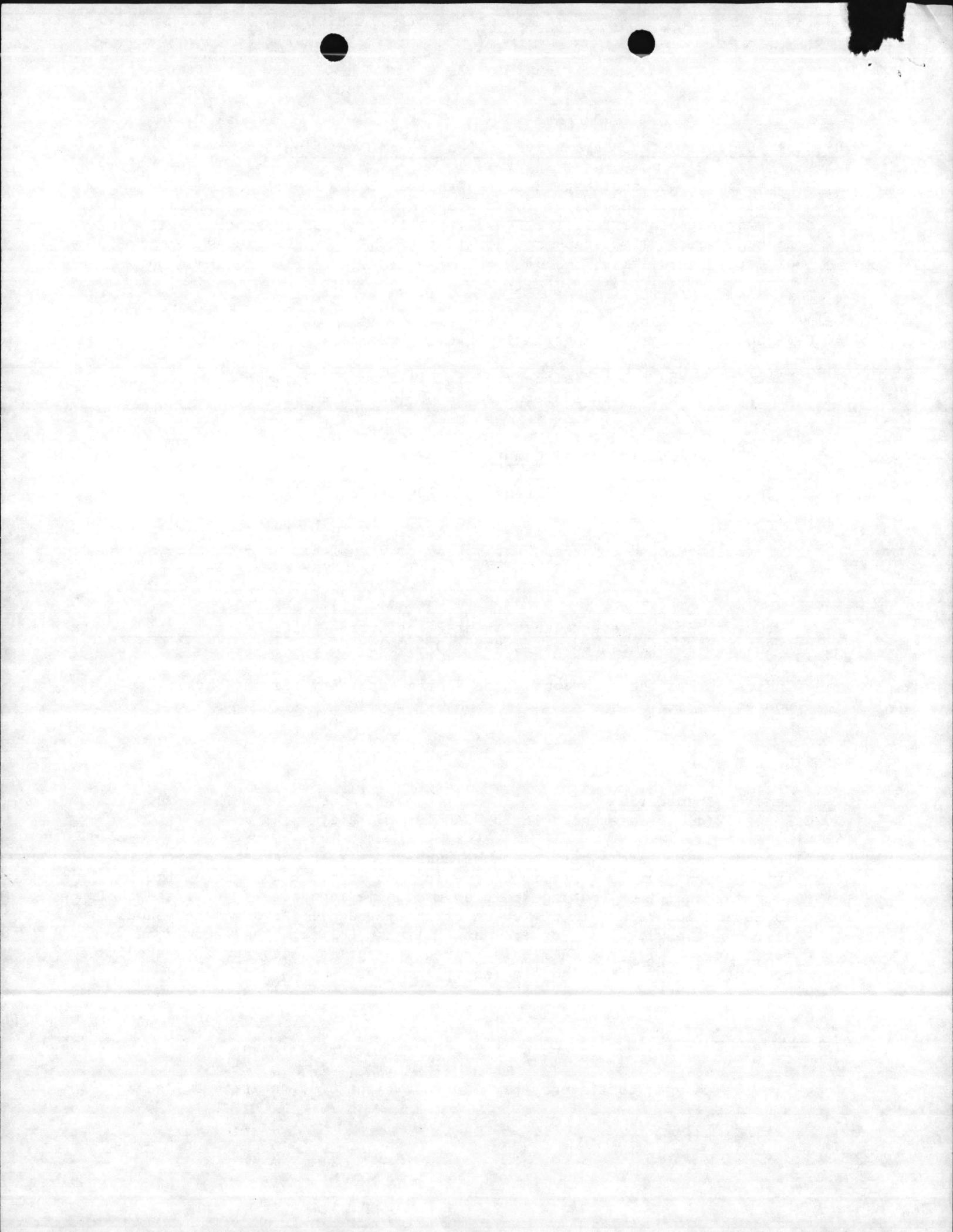
40 CFR 264.56(a)(2) as referenced in 10 NCAC 10F .0032(e)

Provide in your contingency plan for notification of state and local agencies.

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reporting to

G-6 Coordination Agreement

40 CFR 264.52(c) as referenced in 10 NCAC 10F .0032(e)
40 CFR 264.37 as referenced in 10 NCAC 10F .0032(e)

See G-1.

G-8 Required Reports

40 CFR 264.56(j) as referenced in 10 NCAC 10F .0032(e)

Submit a statement that Camp Lejeune will report emergency incidents to the Secretary of the Department of Human Resources within 15 days after the incident. Also a notation of the incident must be entered in the operating record identifying the time, data, and details of the emergency incident. Please state your intentions to do this for the record.

I - CLOSURE

I-1d Inventory, Disposal, Removal, or Decontamination of Equipment

40 CFR 264.114 as referenced in 10 NCAC 10F .0032(g)

Provide a plan for decontamination or disposal of facility equipment and structures when closure is completed. In this plan, explain decontamination procedures including criteria for determining contamination, equipment used (e.g. a steam cleaner, sand blaster, etc.), and procedures for decontaminating clean-up materials and residues. You should also include your plans to demonstrate that clean-up has been effective.

visual obs'n
know what waste?

I-1d(1) Closure of Containers

40 CFR 264.178 as referenced in 10 NCAC 10F .0032(i)

Discuss removal of hazardous waste residues from the containment system at closure. Describe what steps will be taken to perform the clean-up.

At closure, will there be any analyses to follow up on the Navy study currently being conducted?

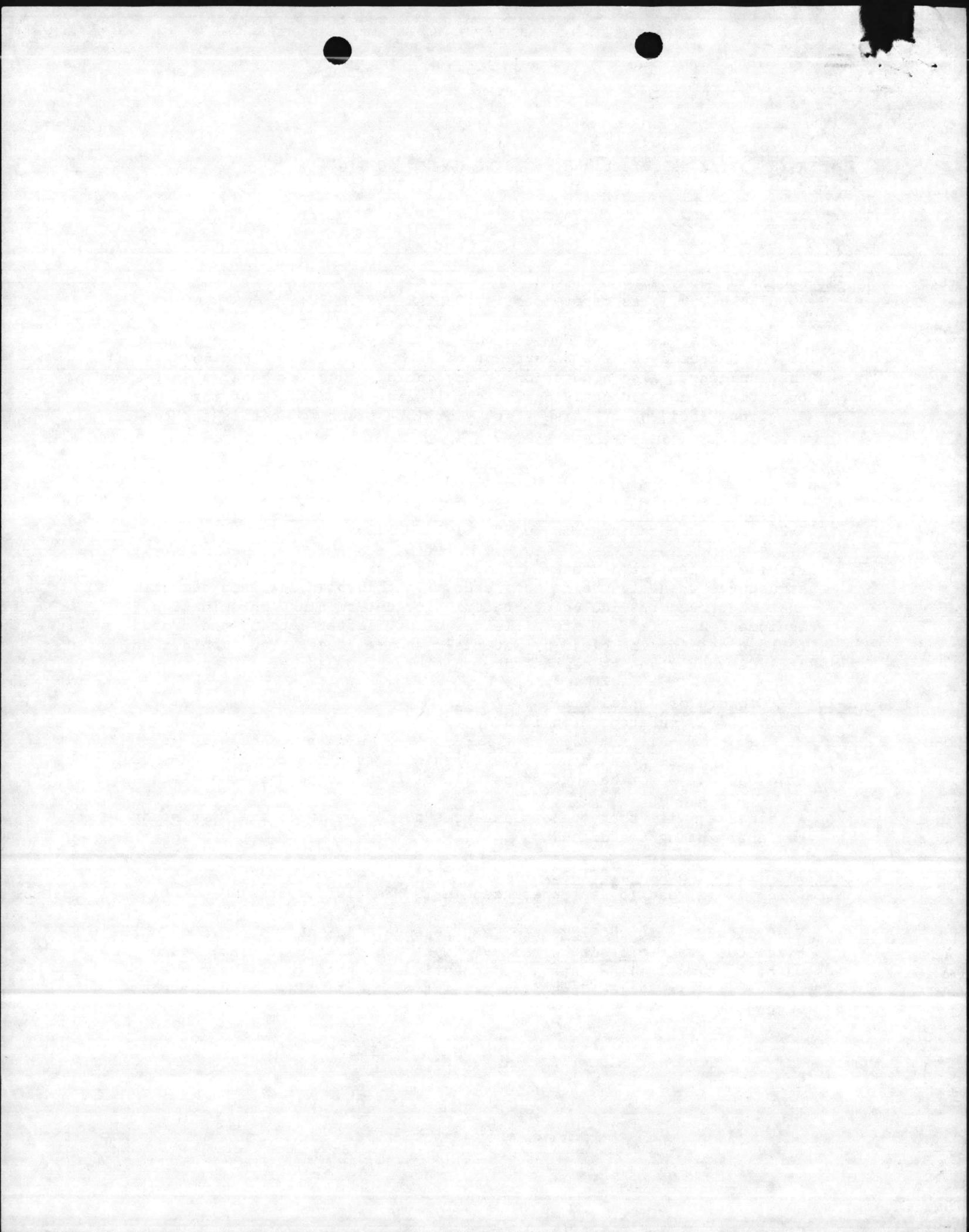
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I-1e(1) Time Allowed for Closure

40 CFR 264.113(a) and (b) as referenced in 10 NCAC 10F .0032(g)

Your closure plan should state Camp Lejeune's intentions to remove all hazardous waste off-site within 90 days from receipt of final volume of waste. It must also state your intentions to complete all closure activities within 180 days from receipt of final volume of hazardous wastes.

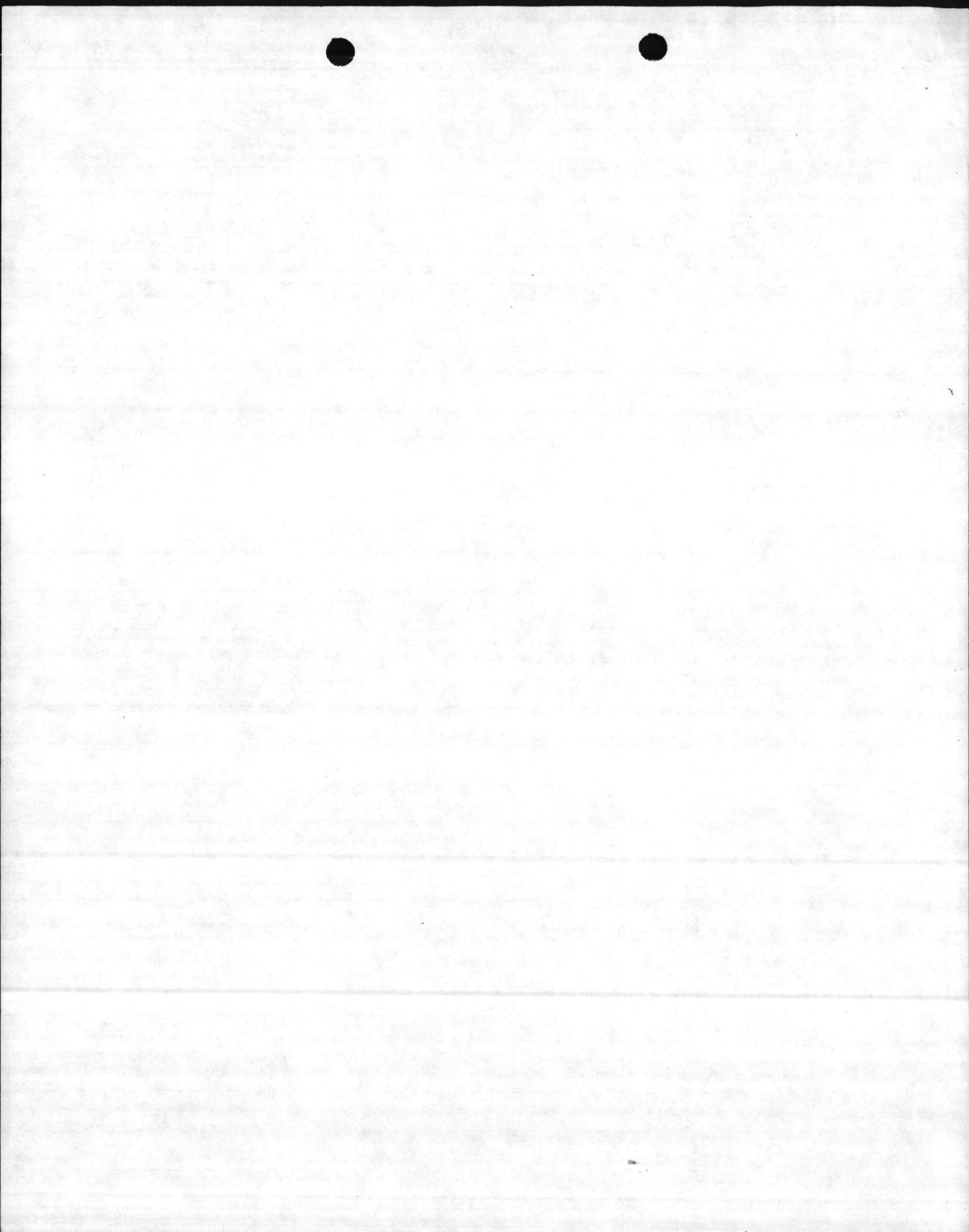
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V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES											
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
23	26	27	38	27	29	27	29	27	29	27	29	27	29		
1	D 0 0 1	700	P	S 0 1										Lithium Batteries	
2	D 0 0 1	165	G	S 0 1										Mineral Spirits, FP 100°F	
3	D 0 0 1	678	P	S 0 1										Decontaminating Agent, DS-2	
4	D 0 0 1	55	G	S 0 1										Paint Thinner, 1% Xylene	
5	D 0 0 2	35	G	S 0 1										Decontaminating Agent, STB	
6	F 0 0 1	110	G	S 0 1										Paint Thinner, 40% Methylene Chloride	
7	F 0 0 2	55	G	S 0 1										Stoddard Solvent 30%, 25% Dichloromethane	
8	F 0 0 3	110	G	S 0 1										Lacquer Paint	
9	U 0 G 1	67	P	S 0 1										DDT (unused)	
10	U 1 2 9	28.	P	S 0 1										Lindane (unused)	
11	U 1 4 2	1	P	S 0 1										Kepon	
12	U 1 5 1	75	P	S 0 1										Metallic Mercury	
13		3190	G	S 0 1										Floor Sweep. Cpd contam. w/PCB	
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should be shifted to local governments, Environmental Protection Agency Administrator William D. Ruckelshaus indicated March 12.

"I think a constant level of funding with the diminished federal share and shifting the responsibility ultimately to local communities to pick that up probably is where we ought to be heading," Ruckelshaus told a group of reporters.

The administrator said EPA is "looking at the whole program . . . in order to see how we can get there, get this thing shifted" (Current Developments, Feb. 24, p. 1820).

"I think what's happened with the construction grants program is that we have actually inhibited the country's ability to build all these sewage treatment plants that we ought to in order to treat wastes," Ruckelshaus commented.

"And the way we've done it is by not appropriating enough money to meet the program needs, and thereby forcing people, instead of looking for their own resources to deal with these problems, to simply line up waiting for federal money," he said.

Construction Funding Study Due Nov. 1

In a related development, EPA Deputy Administrator Alvin L. Alm on March 15 told the first meeting of the agency's task force on funding sewage treatment construction that he wants the group's report and recommendations by Nov. 1, rather than the end of November as he previously requested, according to Victoria Price, special assistant to Jack Ravan, assistant administrator for water.

The task force, which Ravan heads, established a work schedule and tentatively agreed to meet May 10 to hear a report and recommendations of the grant program's Management Advisory Group, which is made up of representatives of various outside organizations involved in the program, Price said.

When the task force starts working on draft reports, she added, it will be joined by representatives of other federal agencies with an interest in how sewage treatment is financed, including the Treasury Department, Farmers Home Administration, Economic Development Administration, and Department of Housing and Urban Development.

An Office of Water staff member said the Office of Management and Budget also will be involved in the effort, although perhaps not on a formal basis. "OMB is always involved with anything that deals with the budget," he said.

The staff member noted that the agency has received only one response, from Zempro Inc., to its call for papers on the subject of financing sewage treatment construction. Representatives of several cities and states have indicated that they will submit papers before the April 2 deadline, he said.

Hazardous Waste

LITHIUM SULFUR DIOXIDE BATTERIES SUBJECT TO RCRA RULES, EPA TELLS DEFENSE DEPARTMENT

The millions of lithium sulfur dioxide batteries used by the Defense Department are hazardous wastes when they are spent or discarded and must be disposed under Resource Conservation and Recovery Act rules, according to the Environmental Protection Agency.

The policy interpretation was contained in a March 7 letter from Jack McGraw, EPA acting assistant administrator for solid waste and emergency response, to Dick Bruner, executive director of technical and logistics services at the Defense Logistics Agency. McGraw said such batteries react violently with water and therefore cannot be placed in

landfills unless they are treated, rendered, or mixed with materials that neutralize them (49 FR 10155).

"The agency believes that under existing management practices," such as storage or disposal in drums, "potentially explosive concentrations of hydrogen gas might reasonably be expected to occur," McGraw wrote.

The department's current practice of accumulating large quantities of the used batteries, he added, "could result in concentrations of toxic gases, vapors, or fumes in sufficient concentration to present a danger to human health or the environment."

Scope of Problem Outlined

The Defense Department bought about 650,000 lithium sulfur dioxide batteries in 1982 and is expected to purchase nearly 2 million containing up to 15 million cells between 1985 and 1990, according to Robert Axelrod, an environmental protection specialist in EPA's Office of Solid Waste.

EPA and Defense data show that the department had about 29,000 used lithium batteries stored at the end of 1982, and that it placed another 30,000 of the batteries in landfills during 1983, Axelrod said. He added that Defense purchases nearly 90 percent of all such batteries manufactured in the United States.

The military uses the batteries to power such equipment as radios, radar, nightscopes, and mine detectors. Although lithium batteries are more expensive than nickel cadmium ones, they are often preferred because they have a longer shelf life and provide twice as much power than the same size nickel cadmium batteries, according to Axelrod.

Decision Not To List As Hazardous

He said EPA had considered listing lithium batteries as a hazardous waste but decided not to do so because declaring them to be reactive has the same effect in that it requires that they be neutralized and disposed of in interim status or fully permitted sites under Subtitle C requirements of RCRA.

A solid waste is considered reactive if it undergoes violent change without being detonated, or reacts violently or forms toxic gases, vapors, or fumes when mixed with water or exposed to pH conditions between 2 and 12.5, according to EPA.

McGraw said the "primary concern" with lithium sulfur dioxide batteries "is the potential, under existing management practices, for components of the batteries to generate toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment when those components are mixed with water or exposed to certain pH conditions."

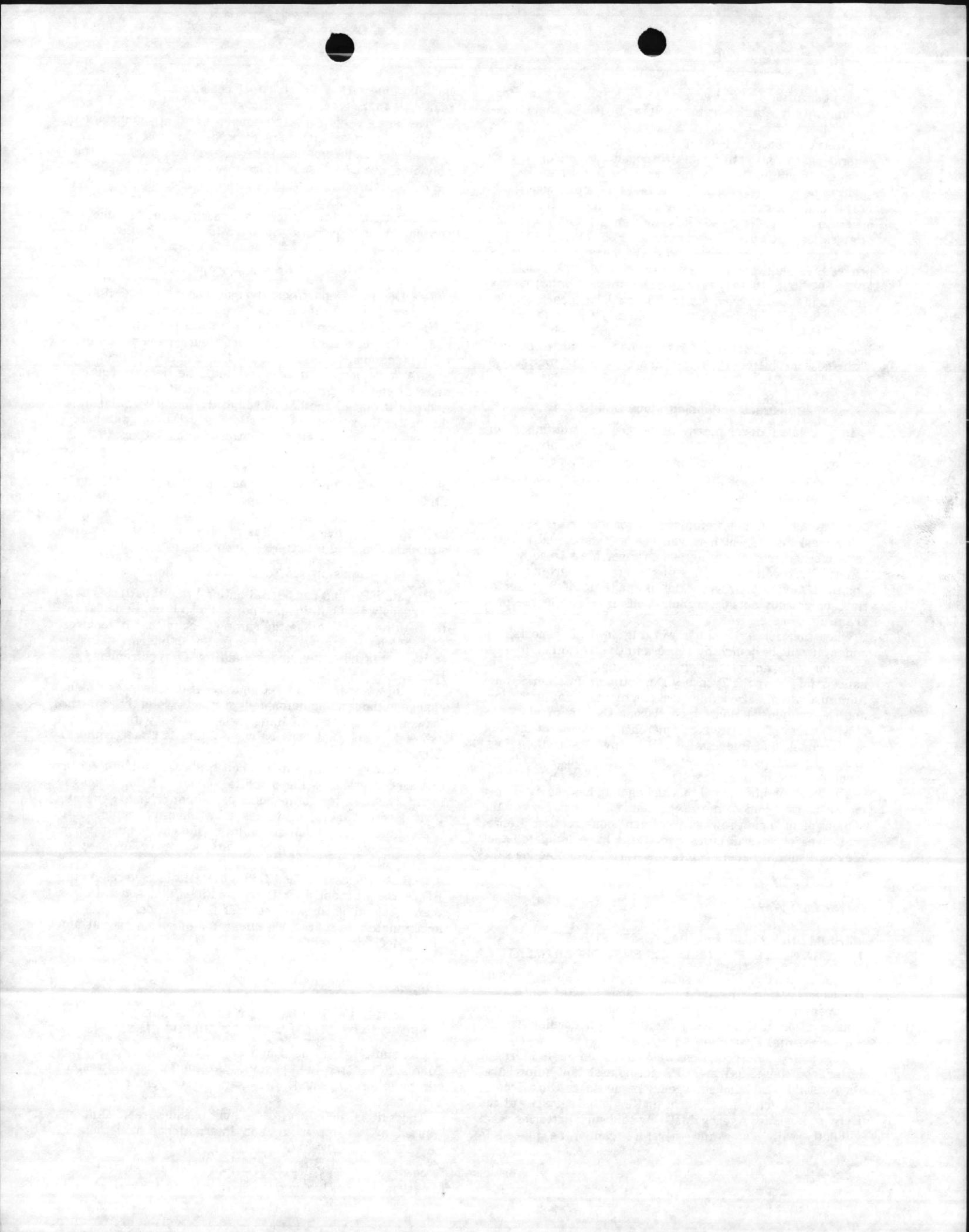
Defense disposal of the lithium batteries is covered by the RCRA rules except at military facilities that generate less than 1,000 kilograms of hazardous waste per month, or accumulate less than 1,000 kilograms of such waste at any time, McGraw noted.

Litigation

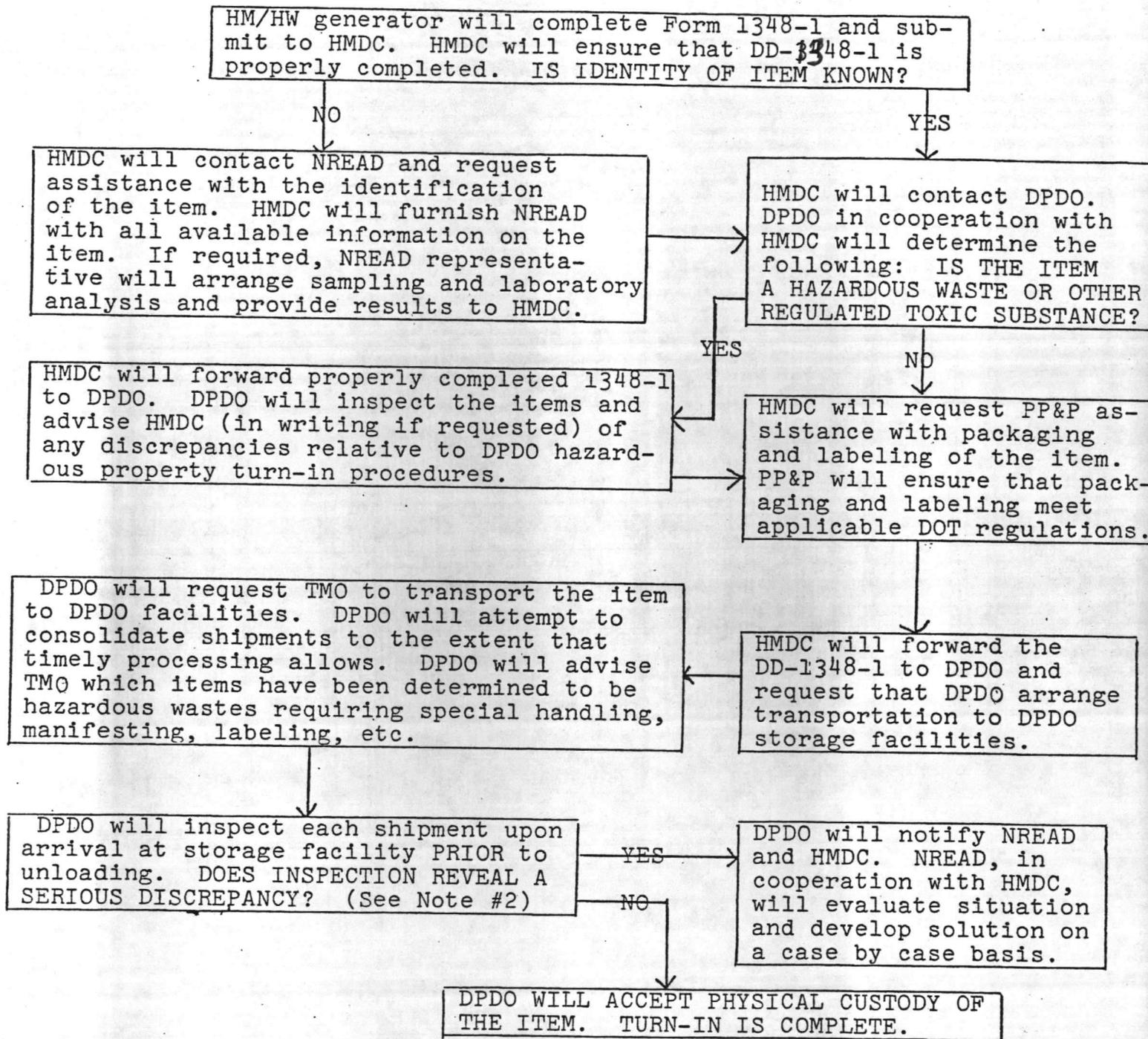
SIX STATES, ENVIRONMENTAL GROUPS SUE EPA TO FORCE ACTION ON MIDWEST SULFUR EMISSIONS

Six states sued the Environmental Protection Agency March 20 to force the agency to take action on Midwestern air pollution emissions they said cause acid rain in the Northeast.

The suit is an effort to "alleviate widespread damages caused by the interstate and international movement of

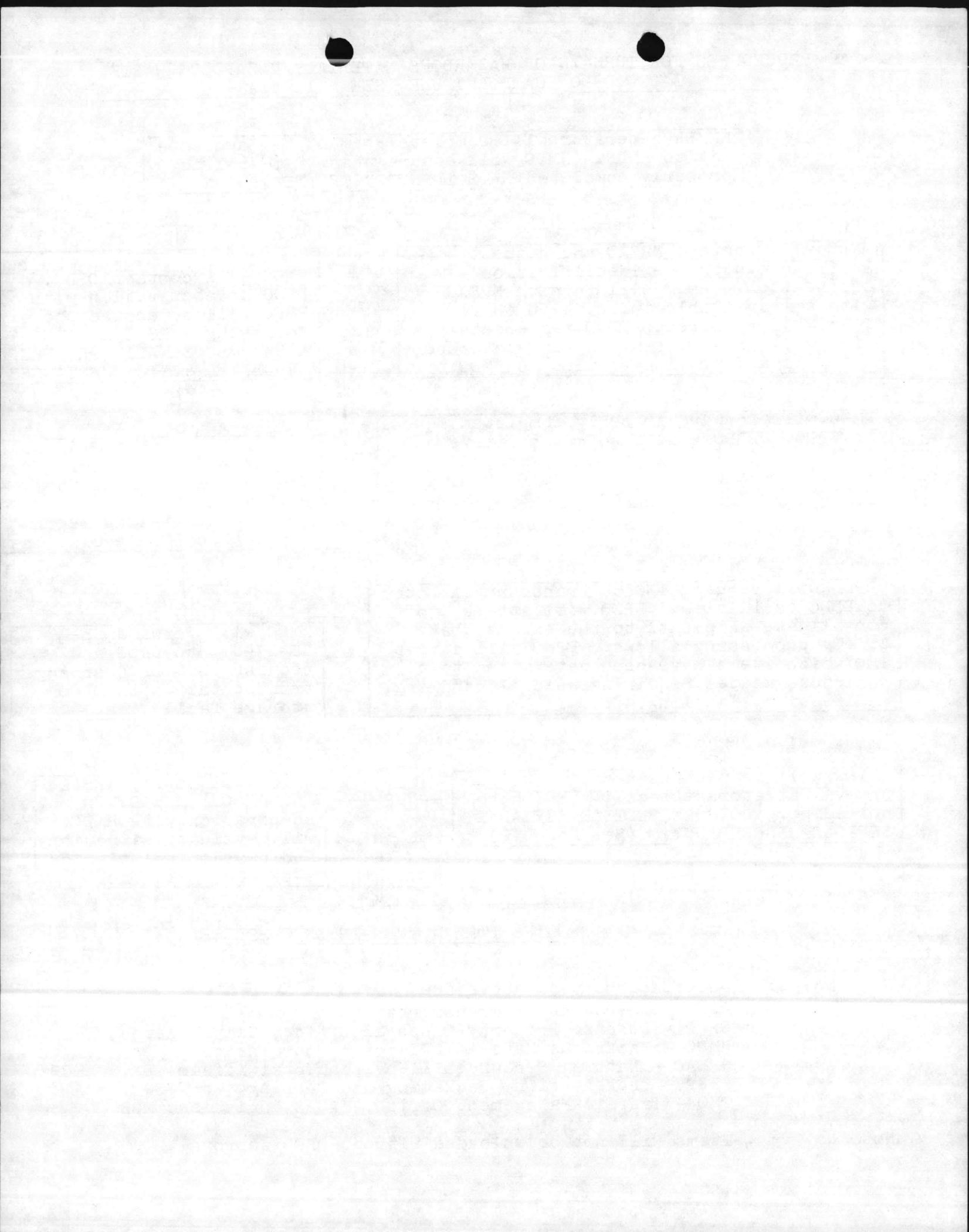


PROCEDURES FOR TURN-IN OF HAZARDOUS MATERIALS/HAZARDOUS WASTE
TO DPDO, CAMP LEJEUNE (SEE NOTE #1)



Note No. 1: Abbreviations used above are
 DOT - Department of Transportation
 DPDO - Defense Property Disposal Office, Camp Lejeune
 HMDC - Hazardous Material Disposal Coordinator
 NREAD - Natural Resources & Environmental Affairs Div., MCB
 PP&P - Preservation, Packaging and Packing, 2d FSSG
 TMO - Traffic Management Officer, AC/S Logistics, MCB

Note No. 2: Items will not be unloaded without DPDO approval.



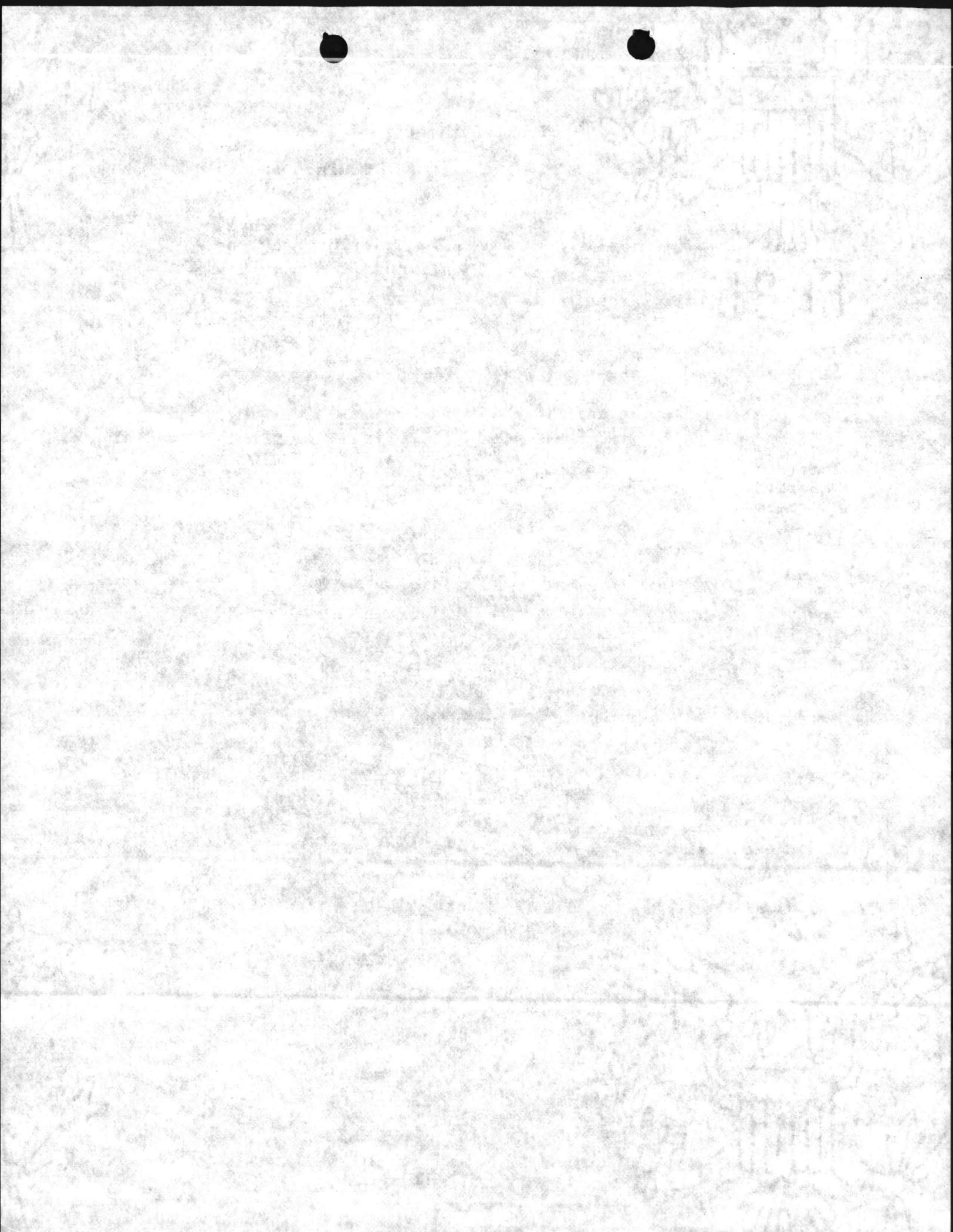
Used Oil Parameters

% Water
Flash Point
BTU/Gal
% Sediment
Viscosity
API Gravity
% Sulfur

Leachable Metals: Arsenic
Barium
Cadium
Chromium
Lead
Mercury
Selenium
Silver

Toxicity
Ignitibility
Reactivity
Corrosivity

Following Organics:
Methylene Chloride
Xylene
Tetrachloroethylene
Trichloroethylene
1,1,1 Trichloroethane
Acetone
Toluene
Methyl Ethyl Ketone
Total Phenols
1,1-Dichloroethane



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