

28 May 87

EPA ltr
on Haz Waste
to LT Col Buehler

Maintenance

See page 3

HEADQUARTERS, MARINE CORPS BASE
CAMP LEJEUNE, NORTH CAROLINA

FILE

960

DATE 1 May 1987

From: Assistant Chief of Staff, Facilities
To: DIRECTOR NREAD

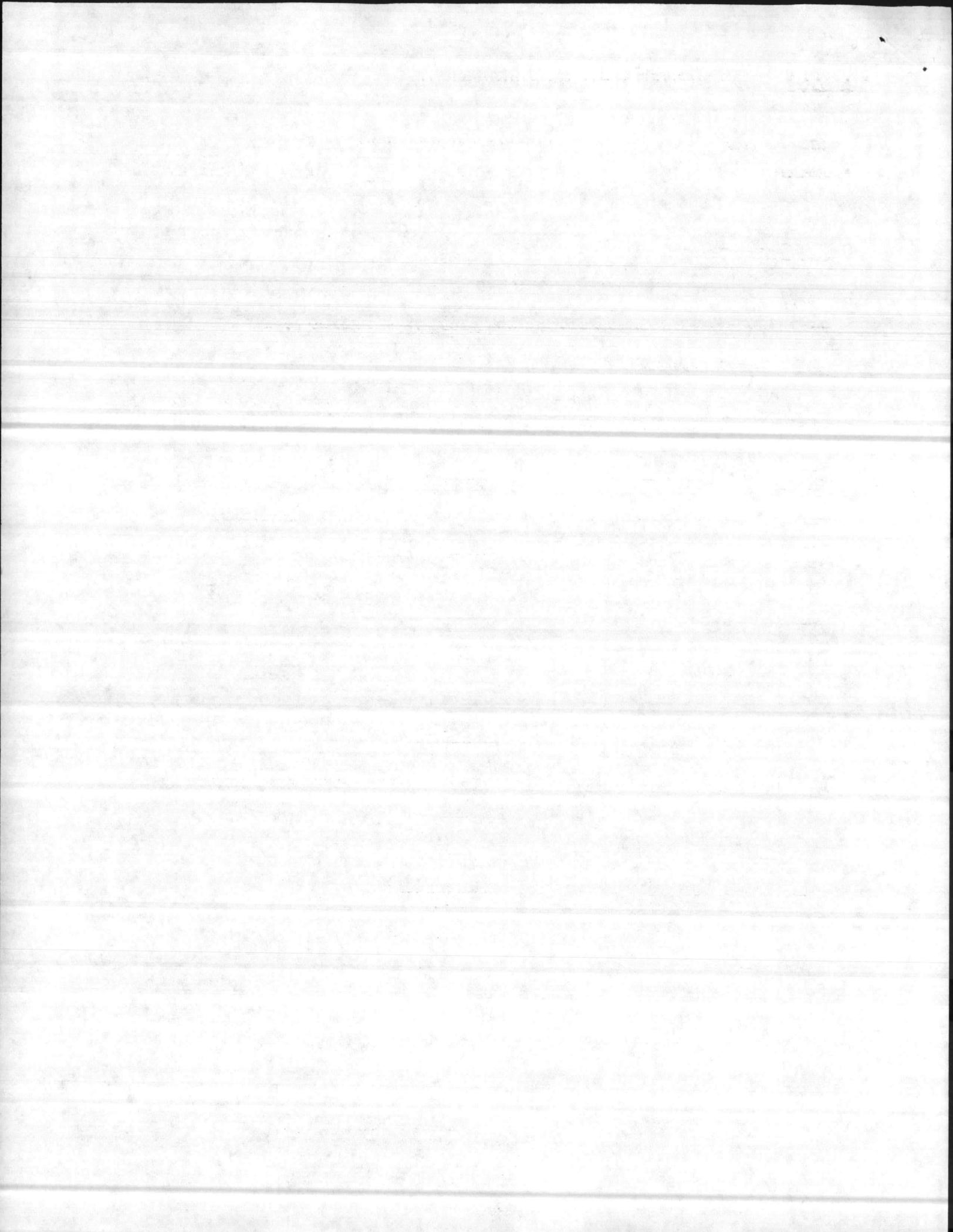
Subj: H.W. INSPECTION REPORT

Attached forwarded for action
as appropriate. I have answered
CG's note indicating we are
taking corrective action and will
have to respond to State of
N.C. letter when it comes.
No response required on this
letter.

R/1
T.J. Dabell

(1) [Signature]

FILE





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

APR 28 1987

4WD-WC

General J.E. Cassity
Commanding General
U.S. Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

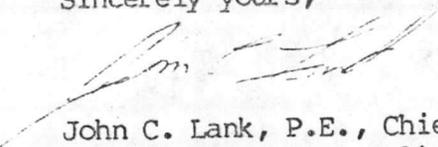
RE: RCRA Hazardous Waste Inspection March 31 and April 1, 1987

Dear General Cassity:

On March 31 and April 1, 1987, an inspection was conducted to determine whether Camp Lejeune is in compliance with applicable RCRA requirements for a transporter, generator and the permitted storage area for hazardous waste. The enclosed report and checklist indicates that Camp Lejeune is not in compliance.

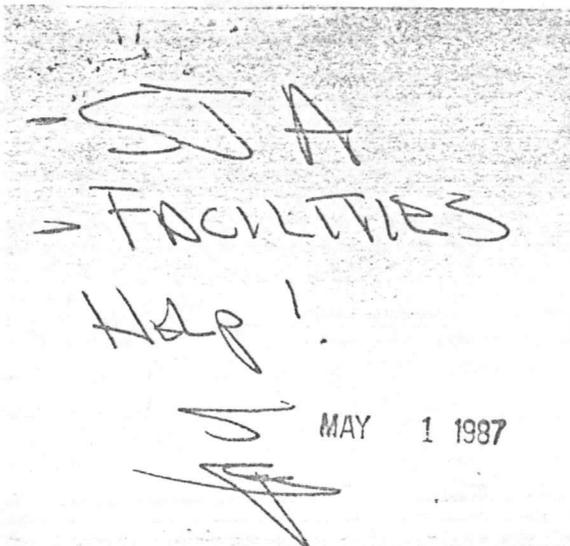
The violations identified during the inspection will be addressed under a separate letter by the State of North Carolina or this Agency. If you should have any questions, please contact David Ellison at 404/347-7603.

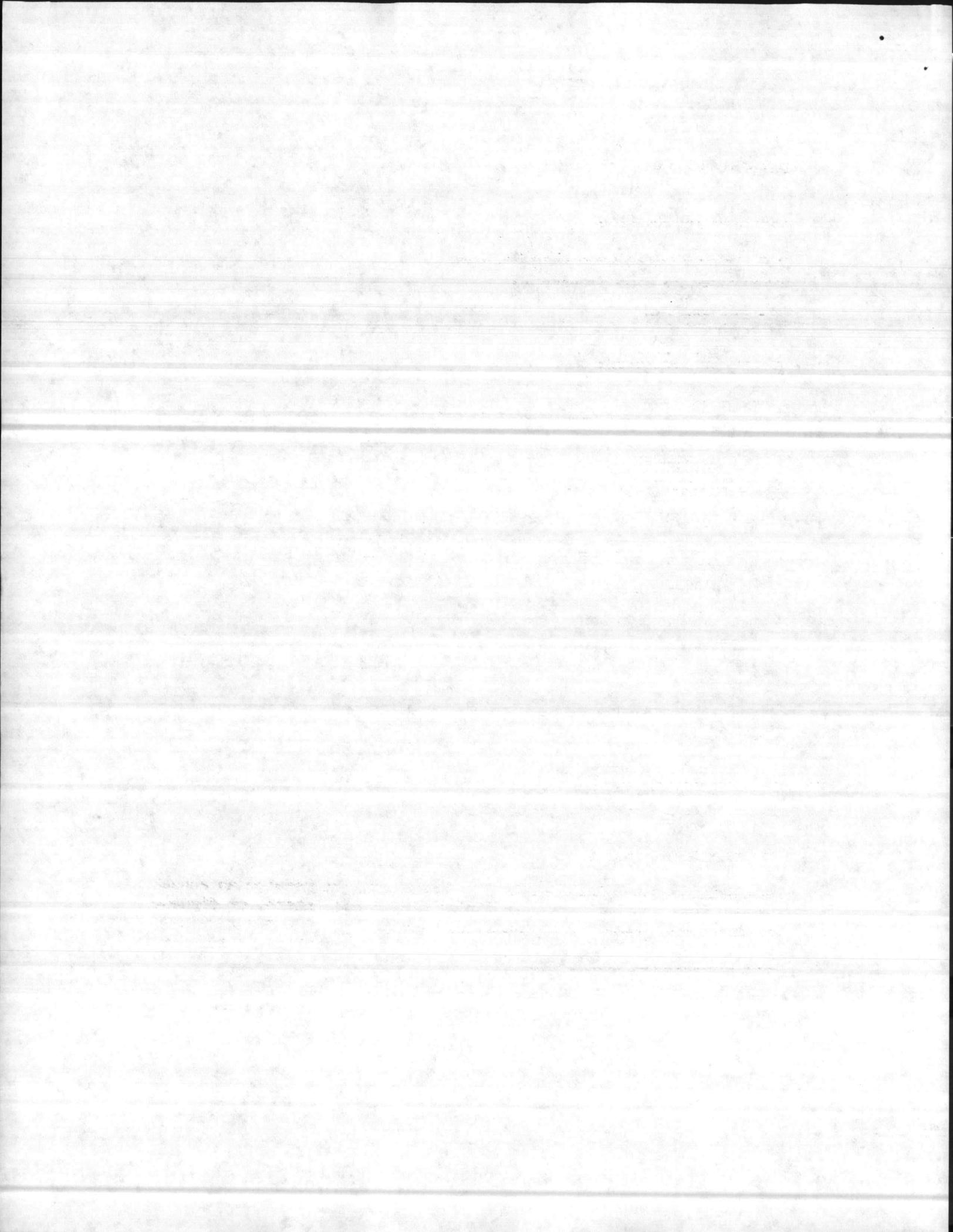
Sincerely yours,


John C. Lank, P.E., Chief
East Unit, Waste Compliance Section

Enclosure

cc: Gary Babb, North Carolina Solid & Hazardous Waste Mgmt. Branch


- SJA
- FACILITIES
HAR!
MAY 1 1987



RCRA SITE INSPECTION

1. Inspector and Author of Report

David G. Ellison
Environmental Engineer

2. Facility Information

U.S. Marine Corps Camp Lejeune (USMC)
NC Highway 24 & US Highway 16
Camp Lejeune, North Carolina 28542
NC6 170 022 580

3. Responsible Official

Danny Sharpe
Head of Soil, Water and Environmental Branch

4. Inspection Participants

David Ellison, U.S. EPA
Richard Gay, North Carolina Solid & Hazardous Waste Management Branch
Scott McPhiliamy, U.S. EPA (Region III)
Winston Weiser, U.S. GAO
Danny Sharpe, USMC
Julian Wooten, USMC
Sammy Gwynn, USMC
Glenee Smith, USMC
Ken Warren, USMC

5. Date and Time of Inspection

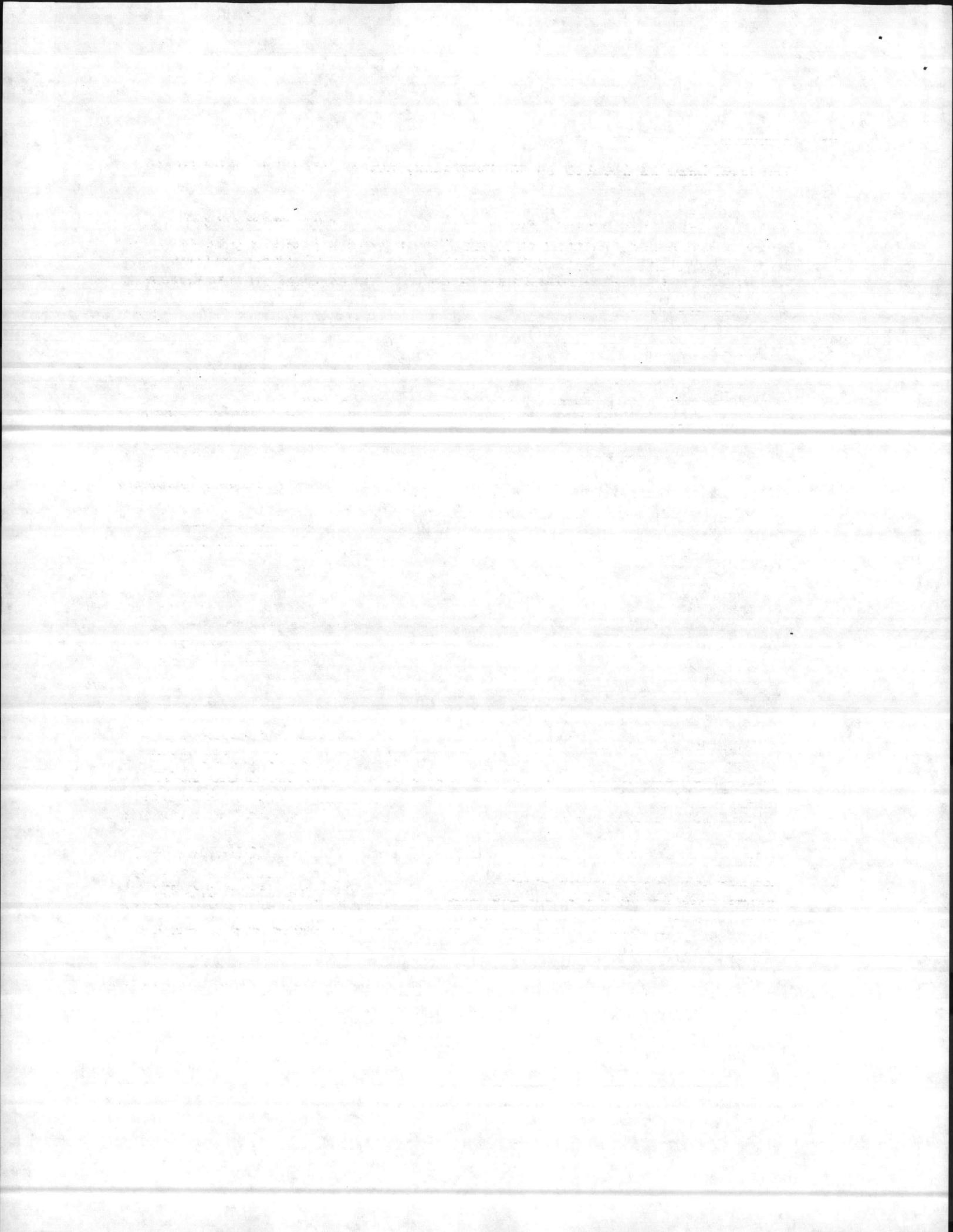
March 31 and April 1, 1987
8:30 a.m.

6. Applicable Regulations

40 CFR Parts 262, 263, 264, and 265

7. Purpose of Survey

The Hazardous and Solid Waste Amendments of 1984 require an annual inspection of all federal facilities that treat, store, or dispose of hazardous waste. This inspection is to determine the USMC's compliance status with the permit conditions, generator standards and transporter standards.



8. Facility Description

The USMC base is located in Jacksonville, North Carolina. The base is the most complete amphibious training base in the world. The main mission of the base is to provide housing, training, logistic and administrative support for marine units, conduct specialized schools and other training as needed, receive and process personnel as assigned, and conduct combat training as needed. The facility was issued a hazardous waste Part B permit for storage in containers on September 7, 1984.

9. Findings

On March 31 and April 1, 1987, EPA conducted an inspection of the USMC, and was accompanied by the State inspector and members of the GAO task force, who are overseeing the quality of RCRA inspections. The USMC is a permitted facility for storage in containers, a generator of hazardous waste and a transporter of hazardous waste.

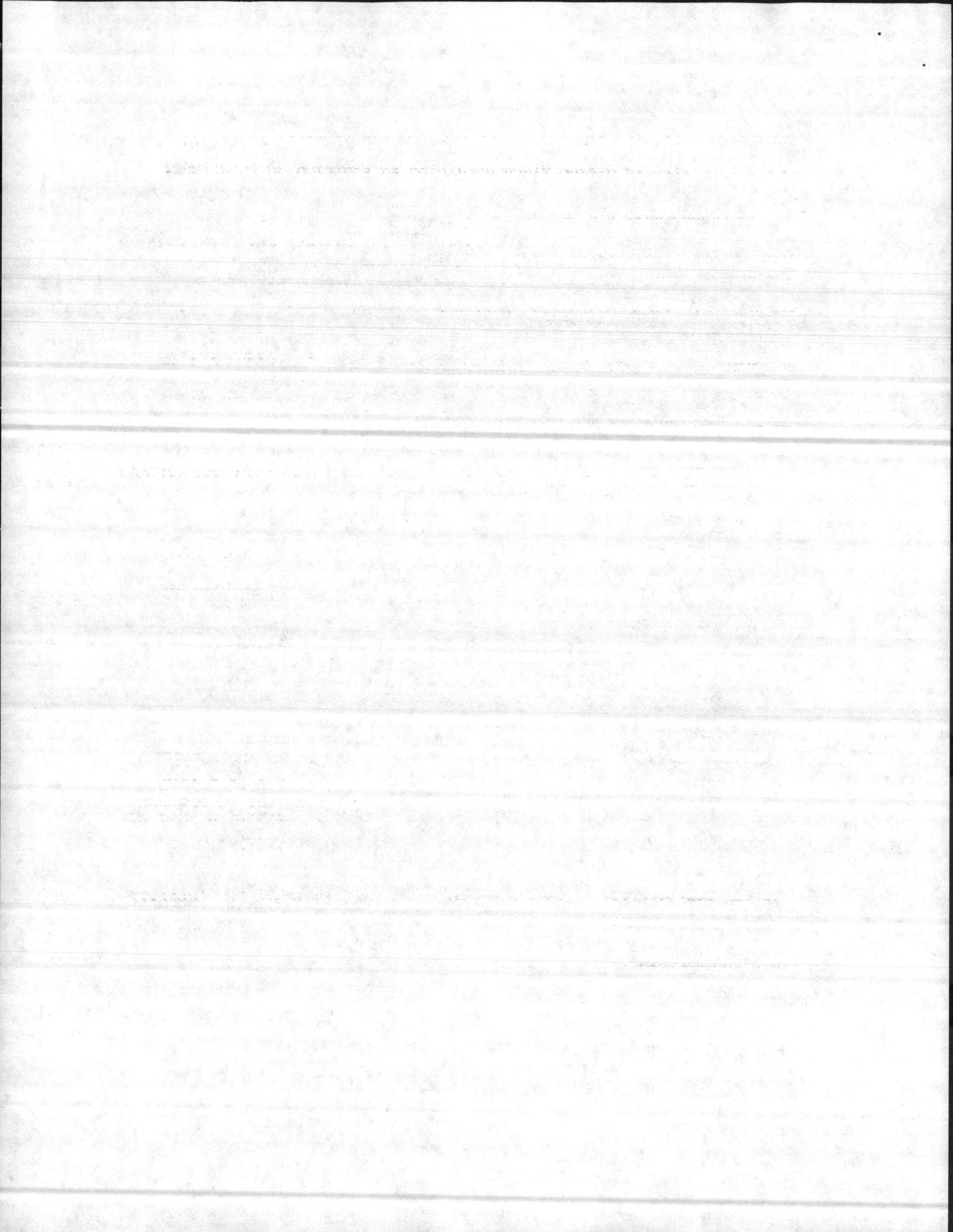
The facility is operated by DRMO, who is responsible for the management of hazardous waste. The USMC is the owner of the facility who oversees the management of hazardous waste under the Natural Resource and Environmental Affairs Division. The Traffic Manager Officer (TMO) is responsible for the transportation of hazardous waste.

Hazardous waste is generated at approximately 100 sites (facility was unsure of actual number) and then transported by TMO to the permitted storage area. Attached is a list of the generators (the first three pages are responsible officer at each site and the last three pages are generating sites). The list is approximately 85 percent complete.

The permitted storage area has two areas for storage of hazardous waste, building TP-451 and TP-463. The capacity in 55 gallon drums of the storage areas are: 224 drums in TP-451 and 504 drums in TP-463. The waste stored in the two storage buildings was in excellent condition. Hazardous materials are also stored in these two buildings.

The following generating sites were inspected: (B = building number) 2d Lav Battalion, sites B429, B1750, and B1755; 2d Amtrac Battalion, sites BA2, BA47, BA47, BB6 and BA1; 8th Marine HQCO, sites BTC-774 and B712; Marine Corp Service Support Schools, sites BM119 and BM191; 2d Maint Battalion, sites B1601, B909, B901 and B902; and 2d Supply Battalion, site B915.

The USMC generates a large quantity of batteries (lead-acid, magnesium and lithium). The lead-acid batteries are recycled and the acid may be occasionally drained, if the battery is cracked. The USMC no longer stores batteries uncovered on pallets, upside down as noted in the last inspection. The magnesium and lithium batteries are not recyclable and are disposed as a waste.



Safety-Kleen currently services 70 sites where hazardous waste is generated. TMO is responsible for signing the manifest as the generator at the various locations. The USMC is currently considering the possibility of Safety-Kleen servicing an addition 50 locations.

TMO is responsible for transporting all waste from the generating sites to the permitted storage buildings. The USMC is also a transporter of hazardous waste, and TMO is responsible for transporting the waste. TMO transports hazardous waste from the USMC Air Station - New River Base, Camp Geiger and Camp Johnson to the Camp Lejeune permitted storage buildings. Only the USMC New River Base is required to have a separate EPA I.D. number.

The USMC generates a large quantity of waste oil. The waste oil is stored at each generating site, then transported to one of four areas for storage before transportation to a burner. The capacity at the four storage areas is as follows:

Building 45 - 273,370 gallon tank
Holcomb Blvd. - 3 tanks 17,585 gallons each, 1 tank 30,000 gallons
Air Station - 3 tanks 30,000 gallons each
Tarawa Terrace - 6 tanks 30,000 gallons each

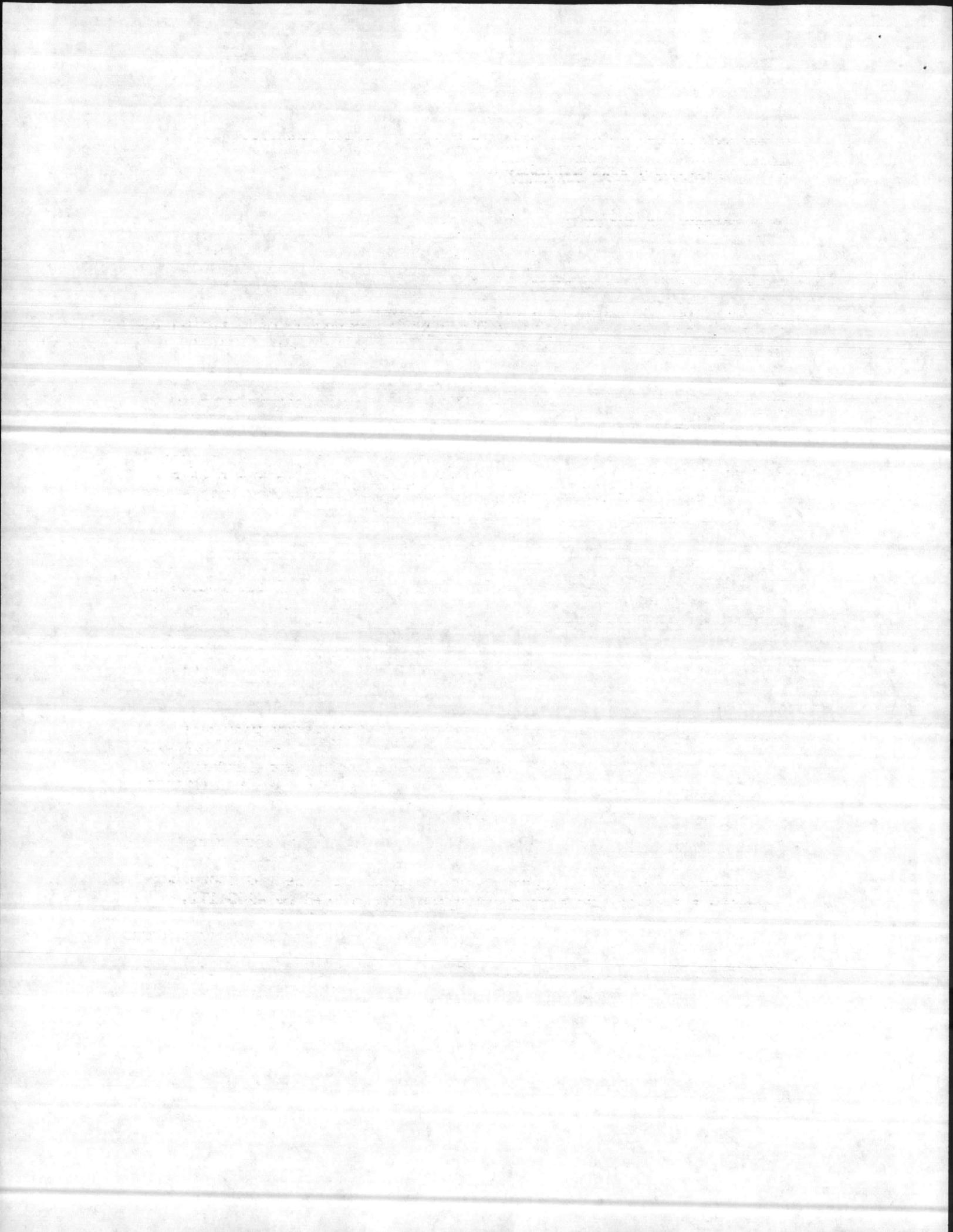
The USMC furnished historical analysis for all the waste oil tanks. The waste oil is a hazardous waste due to the high levels of halogenated solvents and being EP Toxic for lead. The USMC has recently sampled the tank at building 45 and will furnish this data to the State and EPA. The waste oil in all tanks should have a hazardous waste determination conducted on the waste oil currently stored.

The USMC performs the opening burning and detonation of waste explosives at two locations. The USMC ~~was~~ not notified or obtained interim status for this activity. [↑]
h25

The Assistant Chief of Staff of Facilities, Colonel T.J. Dalzell, was briefed on the findings of the inspection. Attached is a copy of the inspection checklist and pictures taken during the inspection. The following violations were identified at the inspection on June 26 and 27, 1986 and have not been corrected, in addition they are violations of the State Compliance Order:

40 CFR 262.34(a)(4) - For a generator of hazardous waste the facility must comply with the requirements of 40 CFR 265.16, for personnel training. The facility has failed to train all personnel at TMO who are responsible for the Safety-Kleen sites.

40 CFR 264.16 - The permit condition in Part I F, requires the USMC to revise any plans that change. The facility has failed to revise the training plan to indicate the addition personnel trained and who need training at DRMO. The facility has failed to train a backup to Nadine Hipp at DRMO.



Permit Condition - Part III Container Storage - The permit requires drums be stacked no higher than two high. At the permitted storage area, boxes were stacked higher than the equivalent of two drums (approximately 7 feet maximum).

In addition, to the above violations that have not been corrected the following violations were identified:

Permit Condition - Part I F. - Any revision to any plans or documents that is required by the permit must be submitted as a permit modification. The USMC has failed to submit changes in plans for the new base order developed, and for the name change of building TC-863 to TP-463.

40 CFR 264.16(c) - Personnel Training - The personnel at DRMO have failed to receive an annual review of the training required in 40 CFR 264.16(a).

40 CFR 264.74(a) - DRMO the operator of the permitted storage area could not provide records required to be maintained in the Part B permit. The records were reviewed at the Environmental Affairs Office, the USMC, the owner of the facility.

40 CFR 262.11 - The USMC has failed to make a hazardous waste determination at all generators; the USMC could not furnish a complete list of all generators. At the 2d Amtrac Battalion an inappropriate hazardous waste determination was made for the dry cleaning solvent. This same situation may be occurring at other locations. The USMC has failed to make a hazardous waste determination for all the waste oil tanks on base.

Permit Condition - Part II L. 3. - This special condition requires the Base Fire Chief to annually review the contingency plan and types of wastes located in the hazardous waste storage facility with representatives of the Naval Hospital and Base Provost Marshall. The USMC could not provide documentation that this review has taken place.

40 CFR 262.34(a)(1) - A generator of hazardous waste, who accumulates waste for less than 90 days must comply with 40 CFR 265 Subpart I. The USMC has failed to transfer the contents of a dented container at site A-1 of the 2d Amtrac Battalion as required by §265.171.

40 CFR 262.34(a)(3) - A generator of hazardous waste, who accumulates waste on-site for less than 90 days must label or mark clearly each container with the words, "Hazardous Waste". Two drums at site A-1 at the 2d Amtrac Battalion were not labeled with the words, "Hazardous Waste".

THE UNIVERSITY OF CHICAGO
LIBRARY

40 CFR 262.34(a)(4) - A generator of hazardous waste, who accumulates waste on site for less than 90 days must comply with 40 CFR 265.16. Danny Sharpe and personnel at 8th Marine HQCO have not had an annual review of training as required by §265.16(c). Personnel conducting training at the generators have not been trained as required by §265.16(a)(2).

3005(e) of RCRA - The USMC has failed to notify or obtain interim status for the thermal treatment activity for the opening burning and detonation of waste explosives.

10. Conclusions

The condition of containers and handling of hazardous waste at the permitted storage area was excellent. The major problem at the permitted storage area was the training of personnel.

The generators of hazardous waste at the USMC have made great improvements since the last inspection, especially 2d FSSG. Many of these improvements are as result of the new Base Order. The USMC still has a complex situation at the generating sites with training personnel, management of waste generated and maintaining paper work. Many problems may be eliminated, if the USMC can increase the number of sites that is serviced by a contractor who handles the solvents.

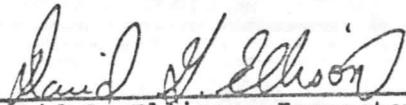
The USMC needs to handle the waste oil that has been generated as hazardous waste and and sample all waste oil to make a hazardous waste determination. The recent sampling on the waste oil tank at building 45 should be submitted to the State and EPA.

11. Recommendations

The USMC needs to research and determine how solvents are being detected in the waste oil. The USMC will be required to handle the waste oil as a hazardous waste until the base can document the waste oil is not hazardous.

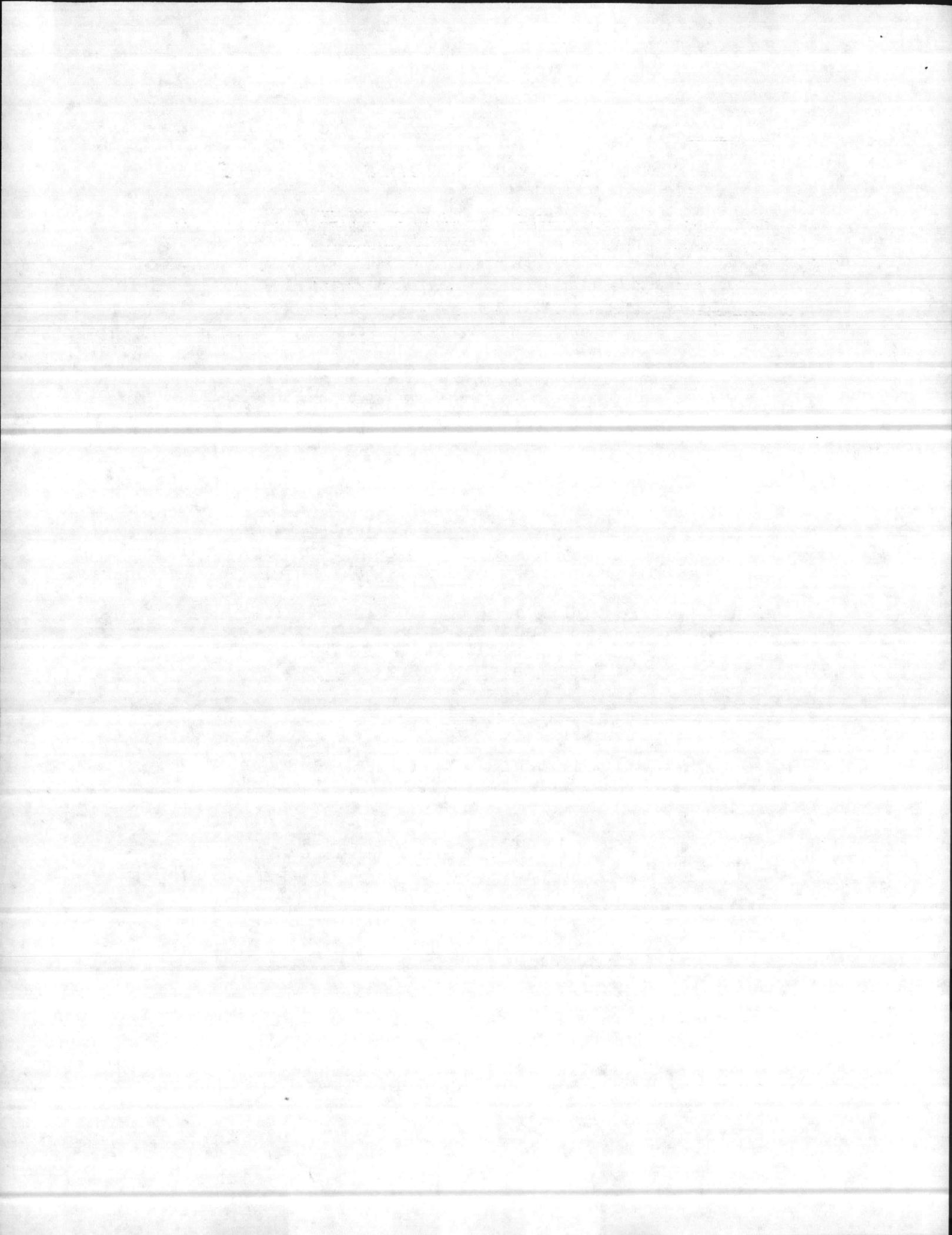
The inspection logs maintained by each generator should indicate how discrepancies are resolved. In addition, an inspection log should be developed for each generating site, not one log for several sites.

12. Signed



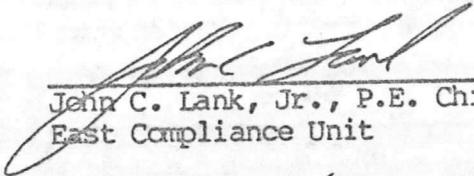
David G. Ellison, Inspector

4-15-87
Date

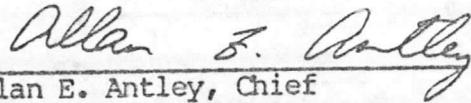


13. Concurrence

Approval



John C. Lank, Jr., P.E. Chief
East Compliance Unit



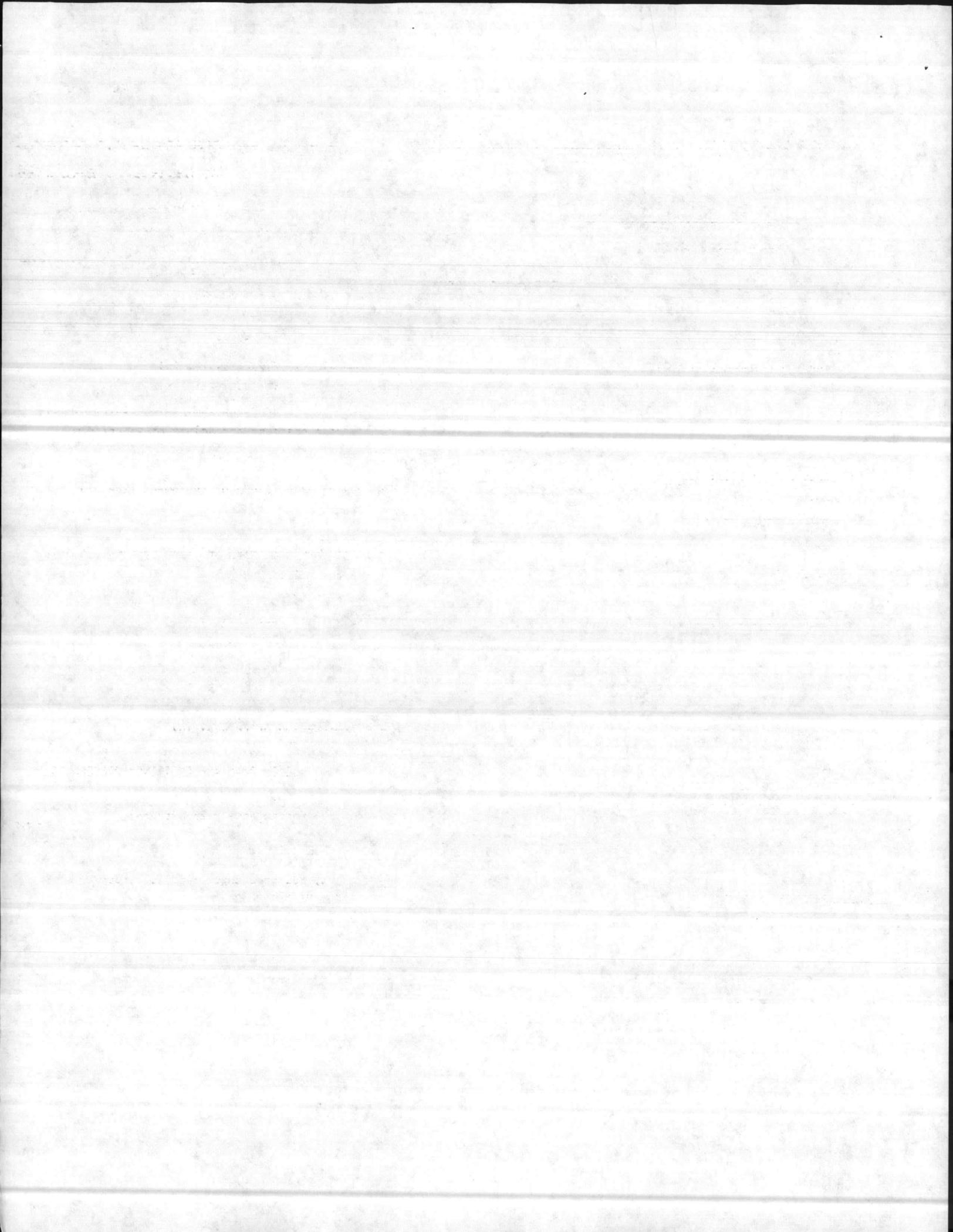
Allan E. Antley, Chief
Waste Compliance Section

4/25/87

Date

4/28/87

Date



Name of Site: USMC Camp Lejeune EPA I.D.: NC6170022580 County: Onslow
 Location: Jacksonville, NC Inspection Date: 3-31-87 Signature of Inspector(s): David H. Illusa
 Compliance Date: _____ Signature of Facility Contact: Danny [unclear]

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

C = compliance

SUBPART B - GENERAL FACILITY STANDARDS

SUBPART C - PREPAREDNESS AND PREVENTION

1. Required Notices (264.12)
 - foreign shipments (a) NA
 - off-site notification (b)
 - new owner/operator (c);
2. General Waste Analysis (264.13)
 - chemical/physical lab reports (a)(1)
 - review/repeat of analysis (a)(3)(4)
 - inspect/analyze (a)(4)
 - analysis plan (b)(c)
3. Security (264.14)

(The facility may be exempt under (a)(1)(2))

 - 24-hour surveillance system (b)(1) or
 - artificial/natural barrier (b)(2)(i) and
 - entry control (b)(2)(ii)
 - danger sign(s) (c)
4. General Inspection Requirements (264.15)
 - inspect for malfunctions, operator errors, discharges, etc. (a)(1)(2)
 - inspect monitoring, safety and emergency equipment, etc. (b)(1)
 - written schedule (b)(2)(3)
 - remedial action (c)
 - inspection log (d)
5. Personnel Training (264.16)
 - program completed (a)(1)(b)
 - annual review (c)
 - documents/records (d)(e)
6. General Requirements for Ignitable, Reactive or Incompatible Waste (264.17)
 - proper handling/"No Smoking" signs (a)(b)
 - documentation (c)

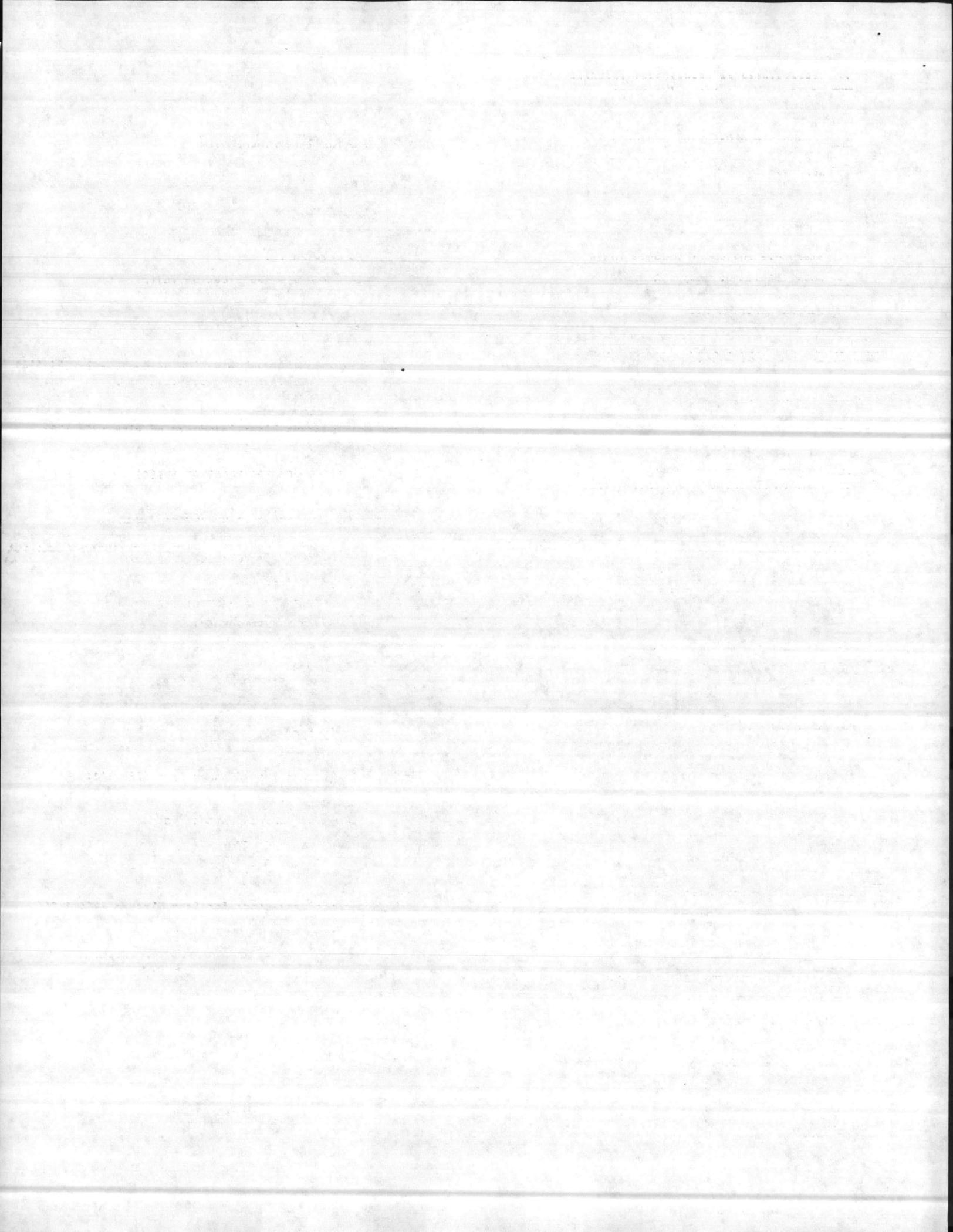
8. Required Equipment (264.32)
 - communication/alarm system (a)
 - telephone or two-way radio (b)
 - fire, spill, and decontamination equipment (c)
 - adequate pressure and volume of water/foam equipment (d)
9. Testing and Maintenance of Equipment (264.33)
 - as required
10. Access to Communications or Alarm System (264.34)
 - immediate (a)(b)
11. Required Aisle Space (264.35)
 - per permit condition
12. Arrangement with Local Authorities (264.37)
 - of changes with wastes characteristics (a)
 - documentation of refusal (b)

SUBPART D - CONTINGENCY PLAN AND EMERGENCY PROCEDURES

13. Amendment of Contingency Plan (264.54)
 - permit revision (a) ADD NEW BASE ORDER
 - emergency failure (b)
 - facility design change (i.e. construction operation) (c)
 - coordinators change (d)
 - equipment change (e)
14. Emergency Coordinator (264.55)
 - on call
 - authority to commit

Revisions to Permit

name change TR 863 to TP-423



- 15. Emergency Procedures (264.56)
 - activation of alarm system (a)(1)
 - notification to State/Local agencies of discharge (a)(2), (d)(1)(2)
 - hazard assessment (c)
 - reasonable prevention measures (e)
 - monitor for leaks, pressure buildup, etc. (f)
 - proper management of recovered waste, contaminated soil or surface water (g)
 - compatibility with contaminated areas (h)(1)
 - emergency equipment cleaned (h)(2)
 - notification of compliance (i)
 - written report (15 days)/operating record notation (j)

SUBPART E - MANIFEST SYSTEM, RECORDKEEPING

- 16. Use of Manifest System (264.71)
 - sign, date (a)(1)
 - note discrepancies (a)(2)
 - copy to transporter (a)(3)
 - copy to generator (30 days) (a)(4)
 - TSDF copy (a)(5)
 - rail or water transporter (b)(1)(2)(3)(4)(5)
 - generator compliance (c)

- 17. Manifest Discrepancies (264.72)
 - bulk discrepancies (a)(1)
 - batch discrepancies (a)(2)
 - written report, if required (b)

- 18. Operating Record (264.73)
 - written (a)
 - quantity, handling methods, dates (b)(1)
 - location/quantity with cross reference (b)(2)
 - waste analysis (b)(3)
 - incident reports (b)(4)
 - inspection record (b)(5)
 - monitoring, testing results (for incinerators) (b)(6)
 - notice to generators (b)(7)
 - closure/post closure cost (b)(8)

- 19. Availability, Retention, and Disposition of Records (264.74)
 - access to records (a) NOT AT DRMO
 - retention (b)
 - records submitted (c)

- 20. Annual Report (264.75)
 - submit by March 1 (a)(b)(c)(d)(e)(f)(g)(h)

- 21. Unmanifested Waste Report (264.76)
 - within 15 days (a)(b)(c)(d)(e)(f)(g)
- 22. Additional Reports (264.77)
 - Section 264.56(j) report (a)
 - facility closure (c)

SUBPART G - CLOSURE AND POST-CLOSURE

- 23. Closure Plan; Amendment of Plan (264.112)
 - written (a)
 - inventory modification (a)(2)
 - amendment (b)
 - 180 day notice (c)

- 24. Disposal or Decontamination of Equipment (264.114)
 - equipment disposal/decontamination

- 25. Post-Closure Plan; Amendment of Plan (264.118)
 - written (a) NA
 - amendment/modification (b)(c)

SUBPART H - FINANCIAL REQUIREMENTS NA

For Federal Facility

- 26. Cost Estimate for Closure (264.142)
 - written (a)
 - anniversary adjustment (b)
 - change adjustment (c)
 - available for inspection (d)

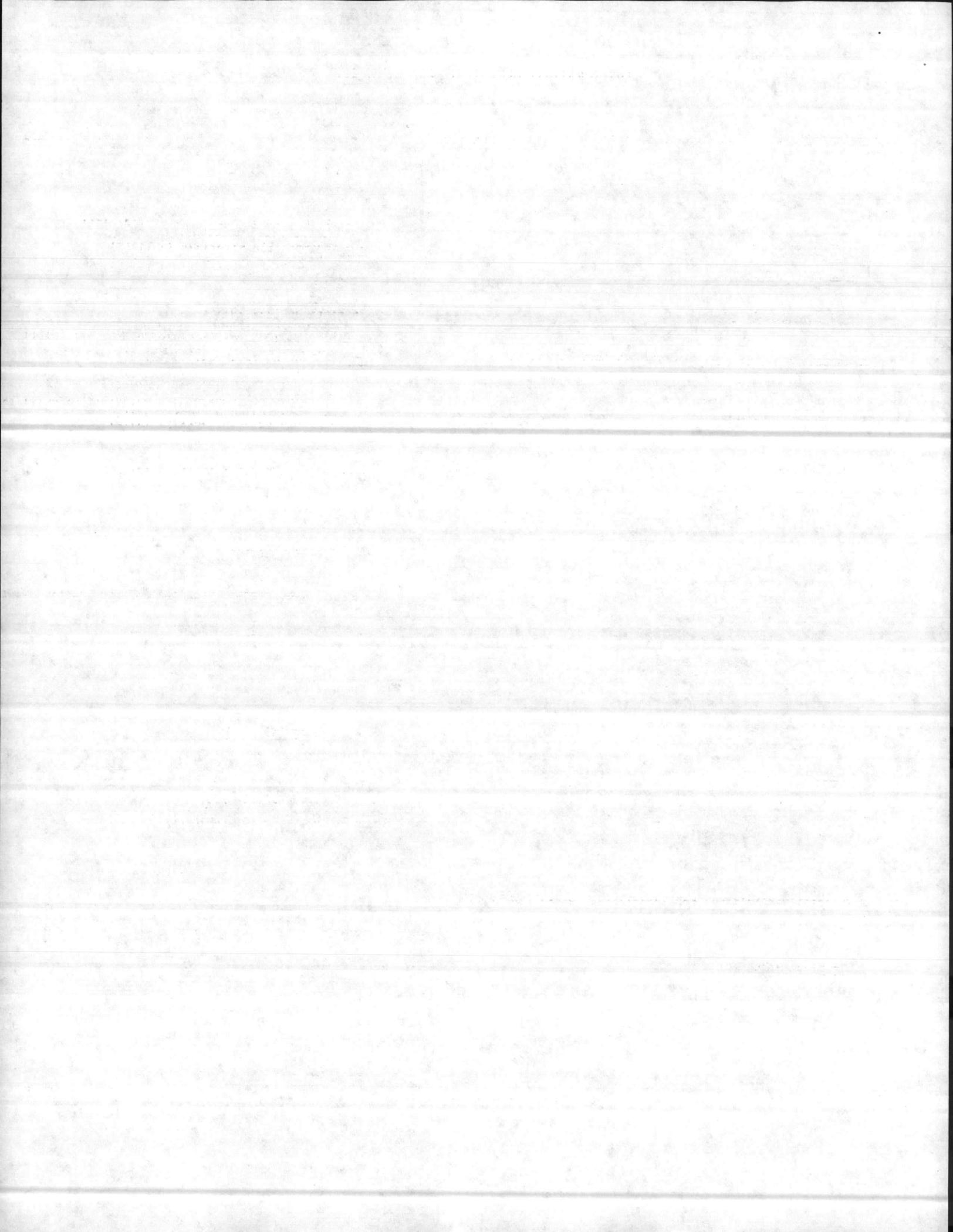
- 27. Financial Assurance for Closure (264.143)
 - yes;
 - Specify form _____

- 28. Estimate for Post-Closure Care (264.144)
 - written (a)
 - anniversary adjustment (b)
 - change adjustment (c)
 - available for inspection (d)

- 29. Financial Assurance for Post-Closure (264.145)
 - yes;
 - Specify form _____

- 30. Liability Requirements (264.147)
 - sudden occurrences (a)
 - non-sudden occurrences (b)

- 31. Incapacity of Owners or Operators, Guarantors or Financial Institutions (264.148)
 - compliance (a)(b)



CONTAINER/TANK INSPECTION FORM - PART 264

USMC Camp Lejeune
Name of Site

NC 617 0022580
EPA I.D.

3-31-87
Inspection Date

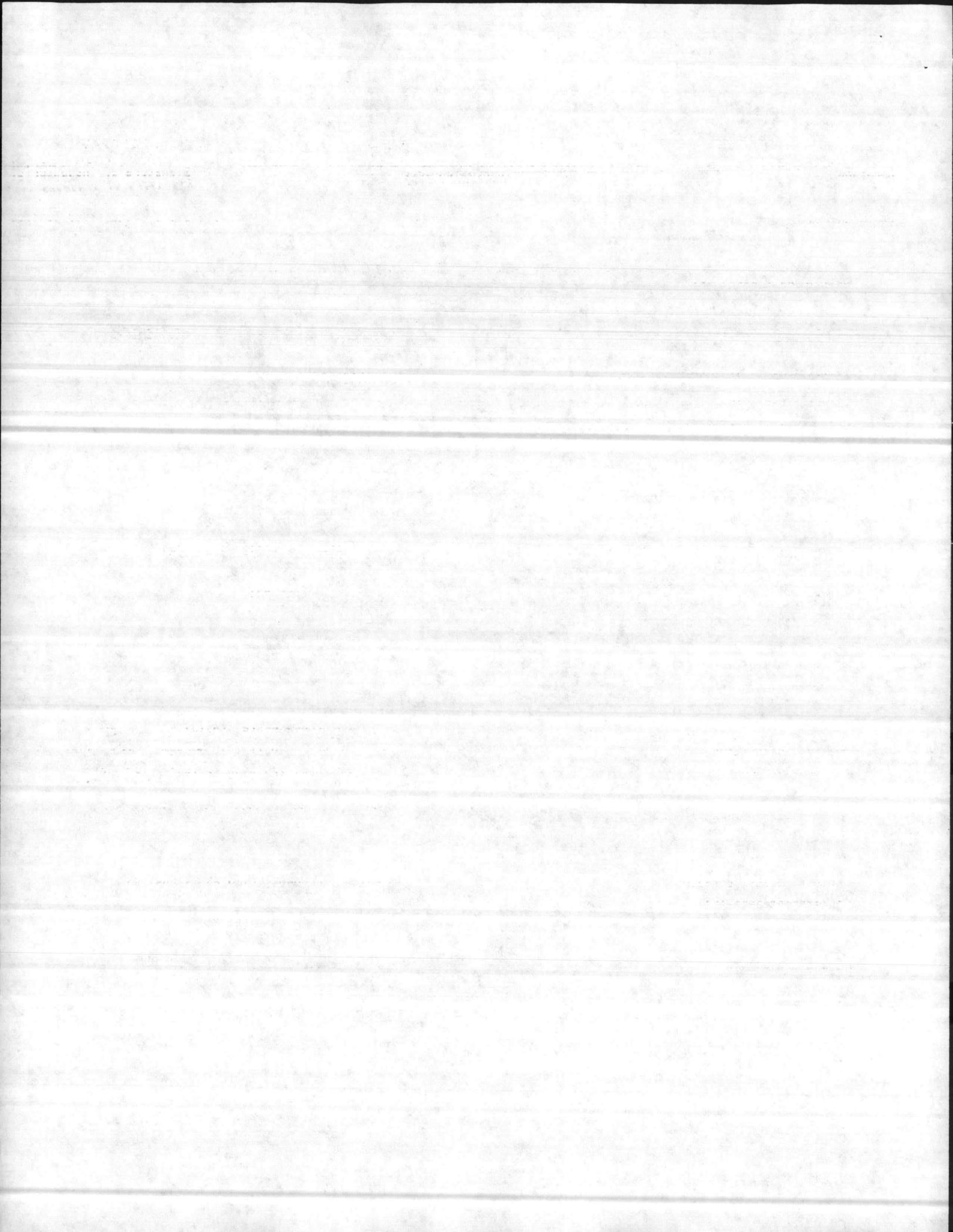
SUBPART I - USE AND MANAGEMENT OF CONTAINERS

1. Condition of Containers (264.171)
 - leakage
 - past leakage (evidence)
 - severe rusting
 - structural defect
2. Compatibility of Waste with Containers (264.172)
 - visual evidence of noncompliance (leakage, corrosion)
3. Management of Containers (264.173)
 - closed (a)
 - improper handling or storage (b)
4. Inspections (264.174)
 - weekly (minimum)
5. Containment (264.175)
 - "With Free Liquids"
 - base (free of cracks or gaps) (b)(1) *recently sealed cracks*
 - run-on prevention (b)(4)
 - removal of spilled or precipitation (b)(5)
 - protect (c)
 - "No Free Liquids"
 - contact with accumulated liquids (c)(2)
6. Special Requirements for Ignitable or Reactive Waste (264.176)
 - 15m (50 ft)
7. Special Requirements for Incompatible Waste (264.177)
 - mixing (a)
 - unwashed container (b)
 - separation (c)

SUBPART J - TANKS NA

1. General Operating Requirements (264.192)
 - incompatible materials (a)(1)(2)
 - overfilling prevention (b)(1)(2)
2. Inspections (264.194)
 - overfilling control equipment (daily) (a)(1)
 - monitoring data (daily) (a)(2)
 - uncovered tank level (daily) (a)(3)
 - above ground construction materials (weekly) (a)(4)
 - surrounding area (weekly) (a)(5)
 - assessment of tank condition (b)
 - spill response procedures (c)
3. Closure (264.197)
 - residue removal
 - decontamination
4. Special Requirements for Ignitable or Reactive Waste (264.198)
 - improper storage (a)(1)(2)(3)
 - buffer (b)
5. Special Requirements for Incompatible Waste (264.199)
 - mixing (a)
 - unwashed tank (b)
6. Air Emissions (264.200)
 - proper control equipment (a)(b)(c)

REMARKS. PERMIT Conditions Capacity TP-451 -(224 drums)
 Capacity TC-863 -(504 drums)
 drums not over two high
 Aisle Space (4 ft between rows, 1 ft walls and 5 ft in front of curbs)



Name of Site USMC Camp Lejeune EPA I.D. NC6170022580 Onslow County

Location Jacksonville, NC Inspection Date 3-31-87 Signature of Inspector(s) David H. Ellison

Compliance Date _____ Signature of Facility Contact Danny Dyer

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
 - Subpart D waste (b) *waste identified as FOUL it is actually D001*
 - Subpart C waste (c)(1)(2) *waste streams all generators not identified on a list*
- 2. EPA Identification Numbers
 - EPA generator number (a)
 - EPA transporter/facility (c)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
 - D.O.T. compliance
- 8. Labeling (262.31)
 - D.O.T. compliance
- 9. Marking (262.32)
 - D.O.T. compliance (a)
 - "HAZARDOUS WASTE" label (b)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
 - proper manifest (a)
 - permitted facility (b)
- 4. Required Information (262.21)
 - document number (a)(1)
 - generator identification (a)(2)
 - transporter identification (a)(3)
 - facility identification (a)(4)
 - D.O.T. description (a)(5)
 - total quantity (a)(6)
 - certification (b)

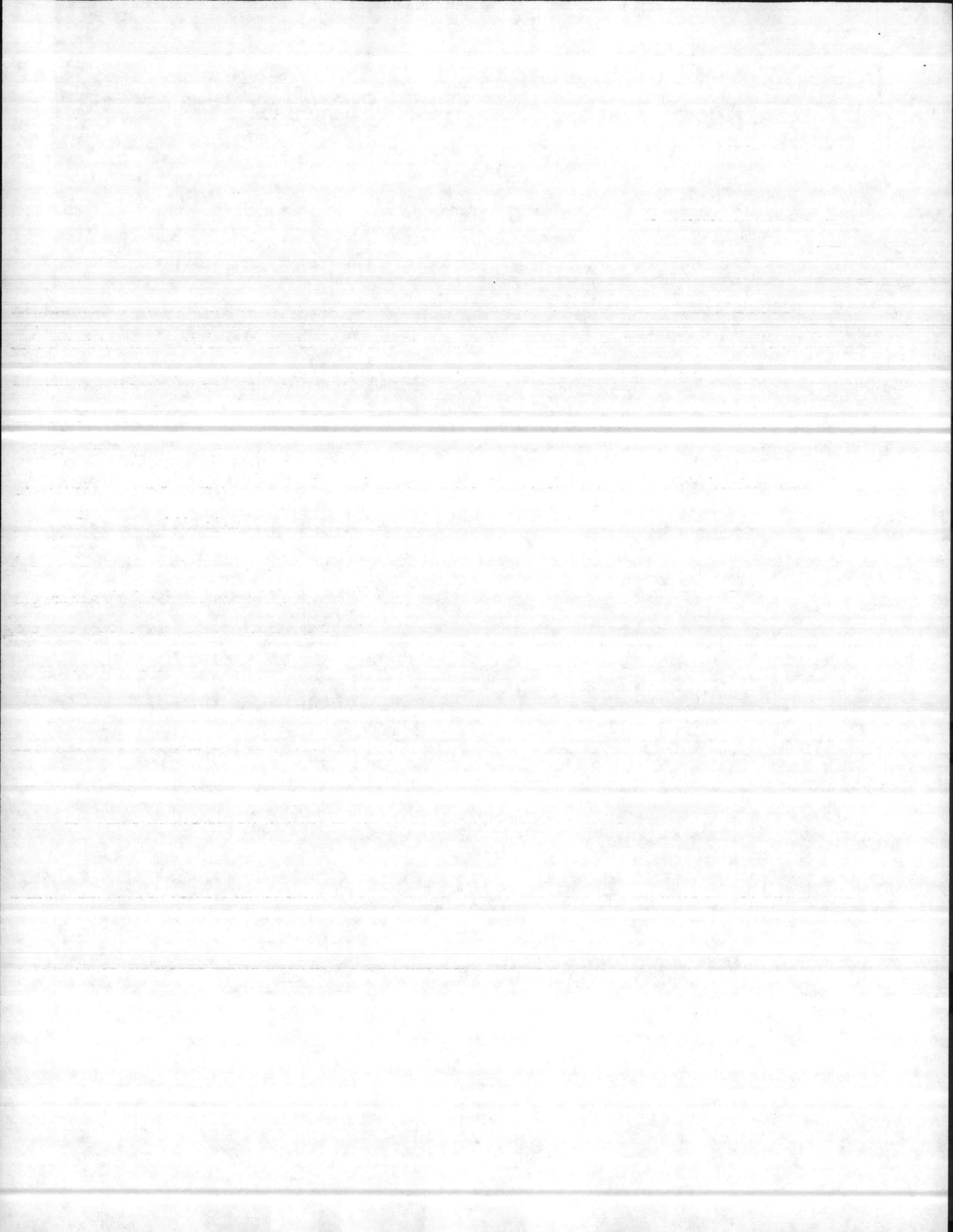
- 10. Placarding (262.33)
 - D.O.T. compliance
- 11. Accumulation Time (262.34)
 - Subpart I; J (a)(1)
 - accumulation date (a)(2)
 - "Hazardous Waste" (a)(3)
 - Subpart C; D (a)(4)* *retaining to list of generating site 262.11*
 - personnel training (a)(4)*

*Cite specific violations of 40 CFR 265 under remarks

- 5. Number of Copies (262.22)
 - minimum number
- 6. Use of the Manifest (262.23)
 - generator handwritten signature (a)(1)
 - transporter signature/date (a)(2)
 - retain copy (a)(3)
 - copies to transporter (b)

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
 - manifest retention (a)
 - annual/exception report (b)
 - test/waste analysis (c)



13. Annual Reporting (262.41)

0 submitted (a)(1-6)

C submitted (b)

14. Exception Reporting (262.42)

C transporter contact (a)

C exception report (b)(1)(2)

REMARKS:

EOD Activities for the base has not been addressed and it should ~~be~~ had interim status.

Subpart I → 262.34(a)(1)

265.171 - DENTED DRUM AT 2d Amtrac BN at site A1

262.34(a)(3) - No hazardous waste label on two drums at 2d Amtrac BN at site A1

262.34(a)(4) the following violations

- 265.16 - no training for Danny Sharpe, TMO training training for individuals who give training at units

Site doc 262.11
~~265.171~~

- list of generators (to maintain the operation of the base)

1875

TRANSPORTER INSPECTION FORM - PART 263

Usme Camp Lejeune
Name of Site

NC6170022580
EPA I.D.

Onslow
County

Jacksonville, NC
Location

3-31-87
Inspection Date

[Signature]
Signature of Inspector(s)

Compliance

[Signature]
Signature of Facility Contact

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. EPA Identification Number (263.11)
 yes (a)(b)
- 2. Transfer Facility Requirements (263.12)
 10 days limit within base
for TSD Facility

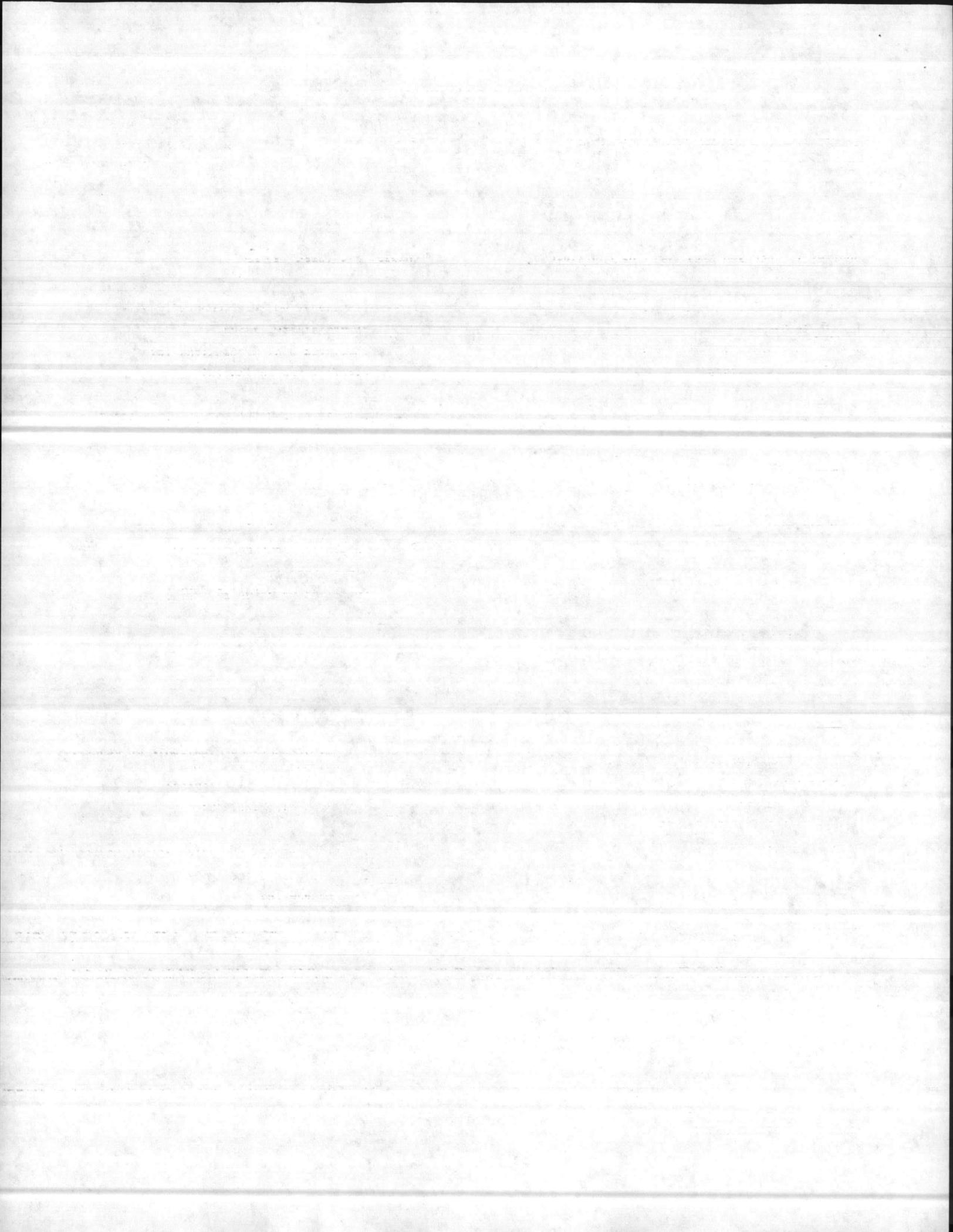
SUBPART B - MANIFEST SYSTEM/RECORDKEEPING

- 3. The Manifest System (263.20)
 - generator signature (a)
 - transporter signature/date/copy (b)
 - accompanying manifest (c)
 - delivery compliance (d)(1)(2)(3)
 - bulk shipment-water (e)(1)(2)(3)(4)(5)
 - rail shipment (f)(1)(2)(3)(4)
 - foreign shipment (g)(1)(2)(3)
- 4. Compliance With The Manifest (263.21)
 - designated facility delivery (a)(1)
 - alternate facility delivery (a)(2)
 - designated transporter delivery (a)(3)
 - designated foreign facility (a)(4)
 - generator contact (b)
- 5. Recordkeeping (263.22)
 - signed copies (a)
 - bulk shipment-water (b)
 - rail shipment (c)(i)(ii)
 - foreign shipment (d)
 - extended retention (e)

SUBPART C - HAZARDOUS WASTE DISCHARGES

- 6. Immediate Action (263.30) None
 - immediate action (a)
 - notification (c)(1)(2)
 - water transporter notification (d)
- 7. Discharge Clean-Up (263.31) None
 - remedial action

REMARKS: ONLY Problem noted at
TMD is for the Safety
Kleen sites the individuals
who sign the manifests
should have personnel
training for a generator;
not all had training



CONTAINER/TANK INSPECTION FORM - PART 265

USMC Camp Heyburn
Name of Site

NC6170022580
EPA I.D.

3-31-87
Inspection Date

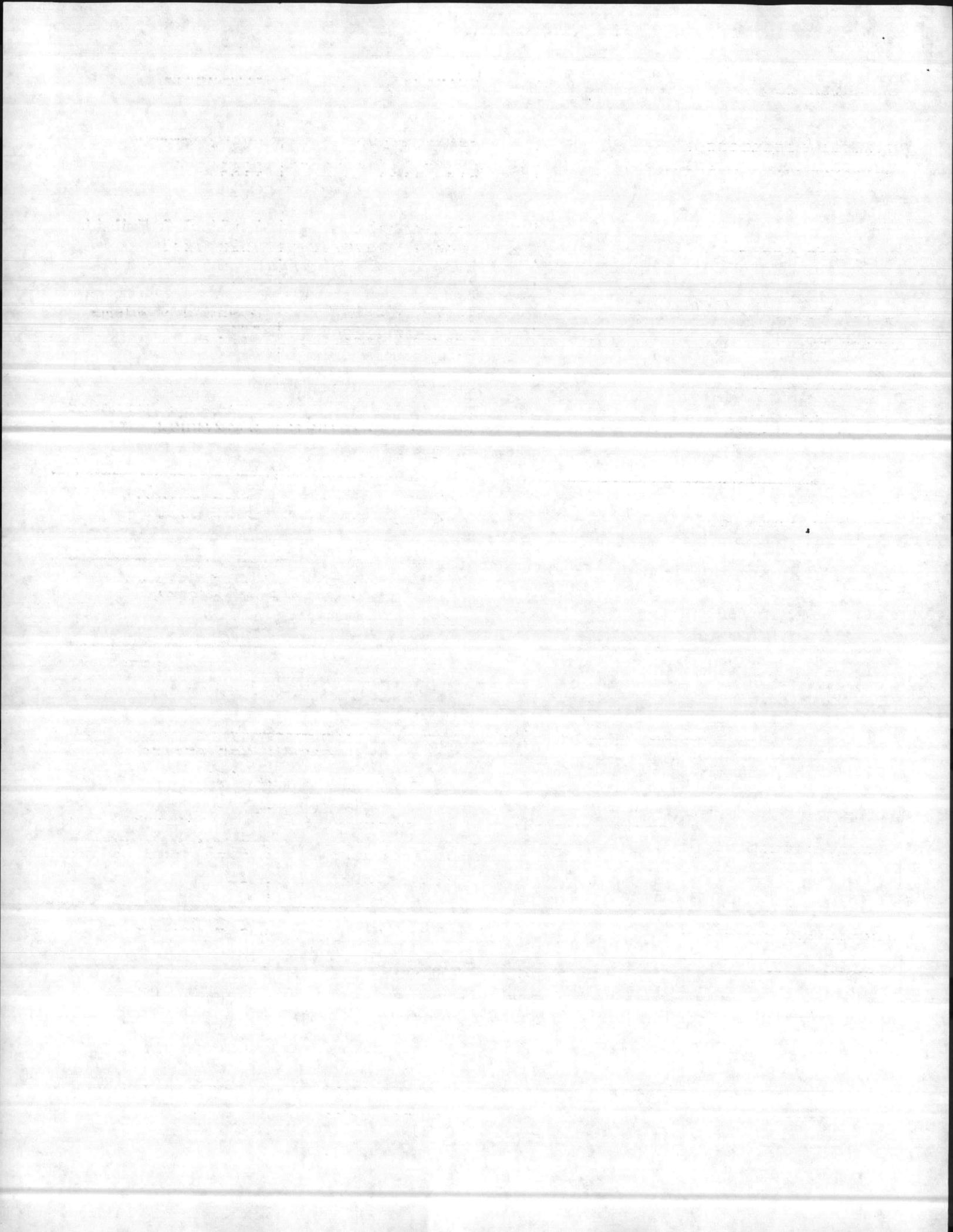
SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS NA

1. Condition Of Containers (265.171)
 - leakage
 - past leakage (evidence)
 - severe rusting
 - structural defect
2. Compatibility Of Waste With Containers (265.172)
 - visual evidence of noncompliance (leakage, corrosion)
3. Management of Containers (265.173)
 - closed (a)
 - improper handling or storage (b)
4. Inspections (265.174)
 - weekly (minimum) ONLY RECOMMEND CHANGES IN LOGS
5. Special Requirements For Ignitable or Reactive Waste (265.176)
 - 15m (50 ft)
6. Special Requirements For Incompatible Waste (265.177)
 - mixing (a)
 - unwashed container (b)
 - separation (c)

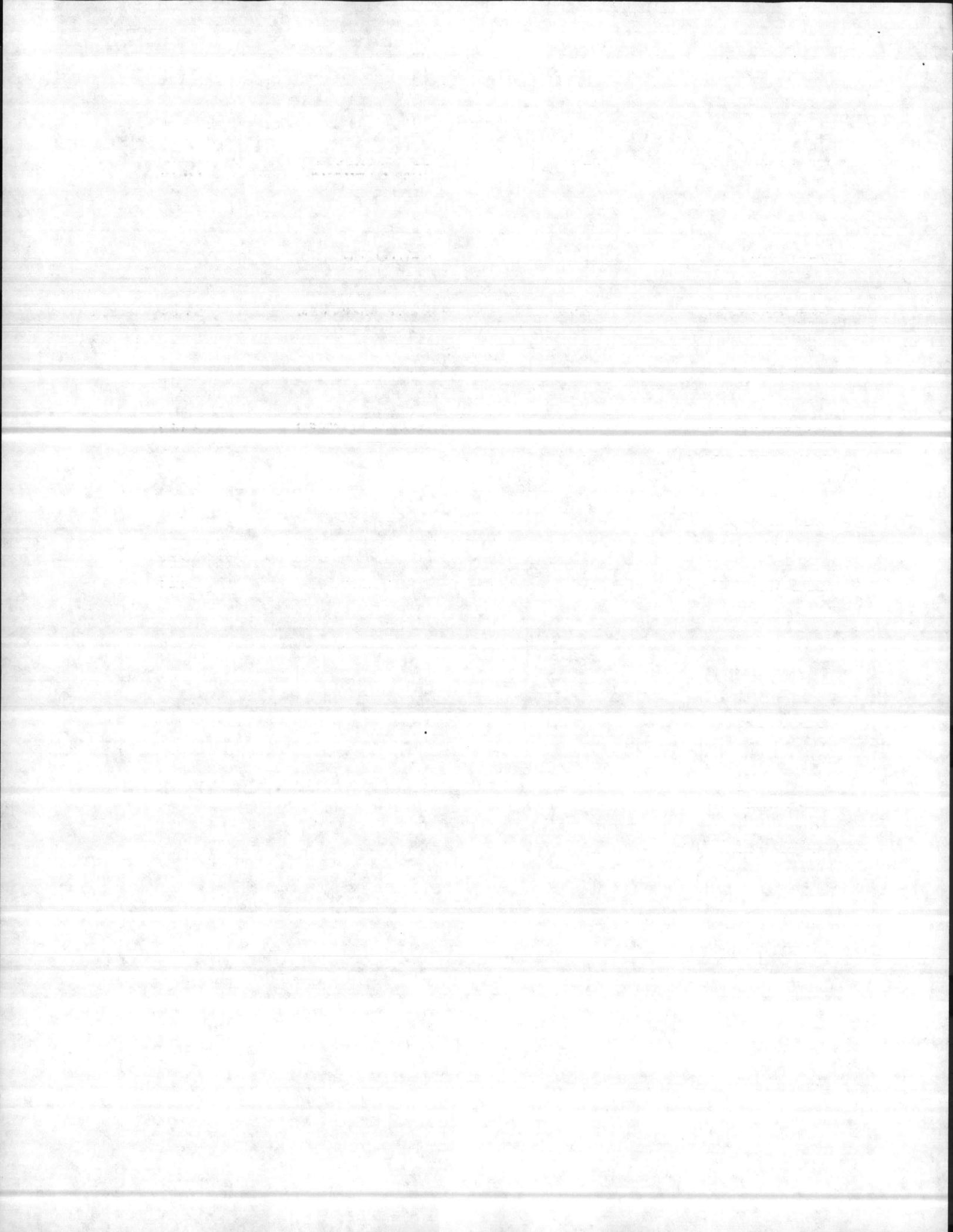
1. General Operating Requirements (265.192)
 - compatibility (a)(b)
 - uncovered tank precautions (c)
 - overflow prevention (d)
2. Waste Analysis and Trial Tests (265.193)*
 - *Section not applicable to a generator only
 - waste analysis/trial test
3. Inspections (265.194)
 - discharge control equipment (a)(1)
 - monitoring equipment (a)(2)
 - waste level (a)(3)
 - construction material (a)(4)
 - surrounding area (a)(5)
 - assessment schedule/procedures (b)
4. Closure (265.197)
 - plan on-site
5. Special Requirements For Ignitable Or Reactive Waste (265.198)
 - properly stored (a)(1)(2)(3)
 - buffer requirements (b)
6. Special Requirements For Incompatible Wastes (265.199)
 - properly stored (a)
 - tank washed (b)

REMARKS: Tanks - not at base currently - but it is possible that waste oil tanks may be a hazardous waste



NAME OF ORGANIZATION	HAZARDOUS MATERIAL DISPOSAL OFFICER	
	PRIMARY	ALTERNATE
Natural Resources & Environmental Affairs Division	Sammy Gwynn Phone: 5003/2083 Bldg 1103 <i>Coordinator for base</i>	<i>Glenn Smith</i> Danny Sharpe 5003/2083 1103
Marine Corps Engineer School	Maj Ferral Phone: 7570/7275 Bldg:	1stLt G L McNutt 7528/7233
Rifle Range Detachment	1stLt O'Hara Phone: 7510 Bldg:	GySgt J V Adams 7510
Field Medical Service School	Lt C W Hansen III Phone: 0826/0915 Bldg:	HM1 C H Schroeder 0742/0892
Marine Corps Service Support Schools	1stLt R D Rule Phone: 0973/0839 Bldg: M131	MSgt Beckly 0710/0738 M119
Reserve Support Unit	Capt M J Stroff Phone: 3144/1790 Bldg:	MSgt Butcher 3144/1790
Infantry Training School	WO F L Cote Phone: 0378 Bldg:	GySgt Gladden 0200
Support Battalion	MSgt D S Keifer Phone: 5247 Bldg: 1011	Sgt Amrine 5247 1011
Headquarters Battalion	Capt Gander Phone: 3852 Bldg: 12	GySgt J L Spann 3852/1079 12
Assistant Chief of Staff, Morale, Welfare & Recreation	D Parker Phone: 2135/2537 Bldg:	D E Raynor 2819
Assistant Chief of Staff, Logistics	Capt Peters Phone: 2536 Bldg: 1116	GySgt Burleson 2536 1116
Base Maintenance Division	D K Bullock Phone: 5300 Bldg: 1202	S Marsicano 5307/3722 1202

DATE: 30 Mar 1987



REVISED 30 MARCH 1987

21 FSSG

ANGLICO

LT LEVIN 1481
SGT MILLER 5212

MEDICAL BN

LT ROCKFORD 1930
HMI TREVONO 1930

8thCOMM

W.O. FLETCHER 2923
SGT TORRES 1072

RADIO BN

LT PFAFF 5114
SSGT SHERMAN 5114

8thENG

MAJOR KOPER 2622
SSGT BOSHEARS 1072

RECON. CO

GYSGT WAGNER 3545
GYSGT NIXON 1664

HQSVCBN

SSGT BRADSHAW 2622
PFC McMANN 1693

SUPPLY BN

WO.O. CLAY 3405
SSGT HOWELL 3418

LSB

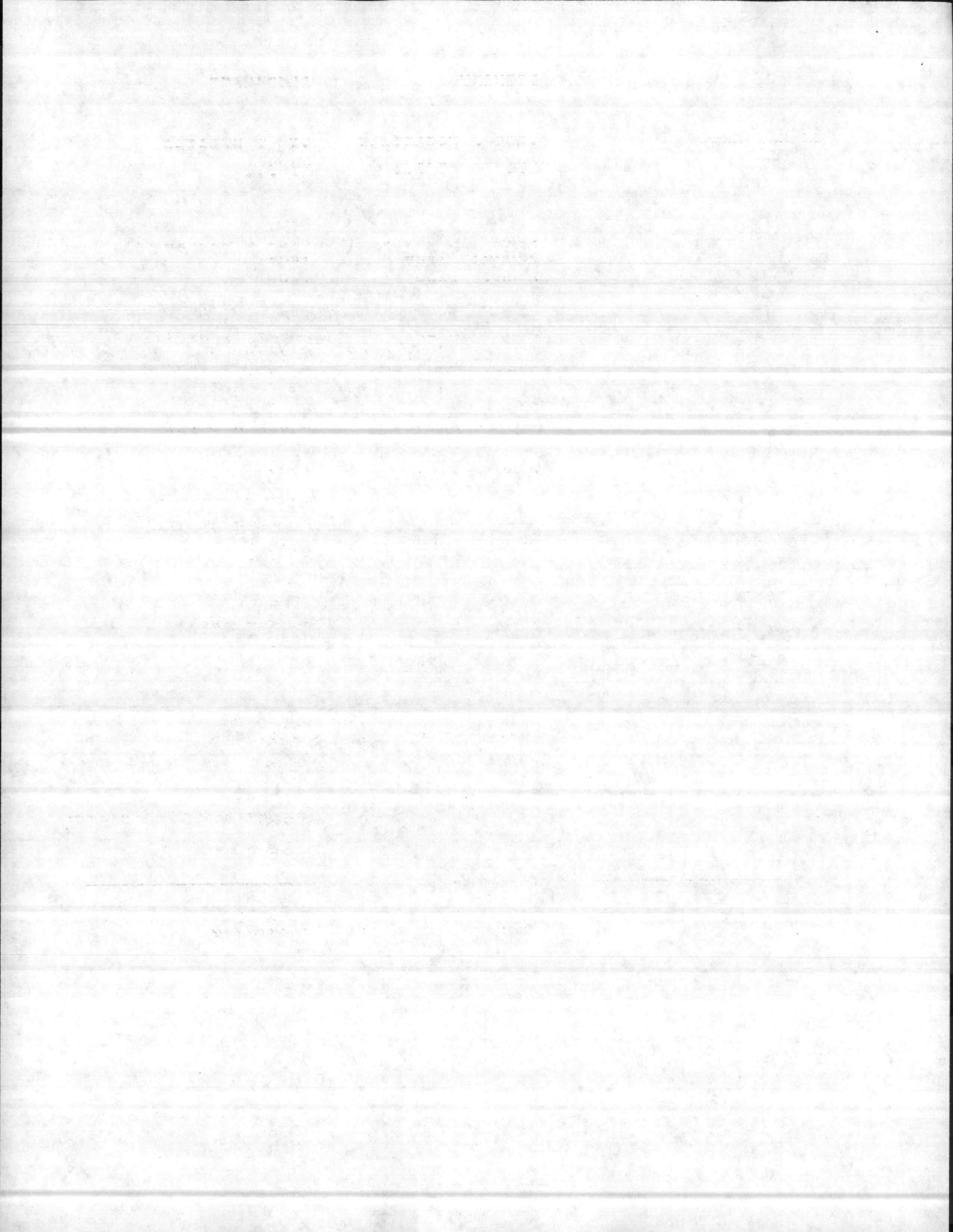
CAPT MYERS 3256
SSGT CASSOU 3754

8thMT

SSGT COX 1684
CPL D.T. BOOKER 1892

MAINT BN

CAPT ALSTON 5222
SSGT OZUNA 5222



2d Mar

UNIT

HAZARDOUS MATERIAL DISPOSAL OFFICER
PRIMARY ALTERNATE

2d Mar Regt

Capt J Fechteler
Phone: 3404
Bldg: HP-100

Sgt T Hutzell
3404
HP-100

6th Mar Regt

Capt W E Hetzel
Phone: 3476
Bldg: 1206

MSgt D Godwin
3476
1206

8th Mar Regt

Capt Sholar
Phone: 0221/0153
Bldg: TC 341

GySgt Tindall
0221/0153
TC 341

10th Mar Regt

Capt W Gordy
Phone: 3165
Bldg: 1707

GySgt C E Lee
3165
1707

HQ Bn

Capt K Hulet
Phone: 3296/3524
Bldg: 317

GySgt J Savage
1434
HP-301

2d CEB

2dLt L DL Sjelin
Phone: 3993
Bldg: 417

SSgt P Marks
3993
417

2d Tank Bn

Maj T Cornell
Phone: 3861/3725
Bldg: 407

MGySgt Sloan
3861/3725
407

2d AAV Bn

Lt M D Parker
Phone: 7586
Bldg: BB-5

MGySgt R D Clodfelter
7586
BB-5

2d Recon Bn

Capt L G Flores
Phone: 7124/7530
Bldg: BD-102

GySgt W Dean
7124/7530
BD-102

2d LAV Bn

Lt Gonzales
Phone: 2301/1477
3305
Bldg: 1750

Gygt Stokes
2301/1477
1843/1992
1750

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MARINE CORPS BASE

SPECIAL SERVICES & MARINE CORPS EXCHANGE

SITE #1	BLDG. #1103	AUTO HOBBY SHOP
#2	" 1120	" " "
#3	BLDG. #TC-470	" " "
#4	BLDG. #BB-71	" " "
#5	BLDG. #1916	GOLF COURSE MAINT
#6	BLDG. #31	GOTTSCHALK MARINA
		BOAT HOUSE
#7	BLDG. #1611	HADNOT POINT SERVICE
		STATION
#8	BLDG. #TT-2453	SERVICE STATION
#9	" #AS-410	" "
#10	" #BB-177	" "
#11	BLDG. #25	LAUNDRY & DRY CLEANING
		SHOP

HEADQUARTERS BN MCB

SITE #1	BLDG. #11	ARMORY
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BASE MAINTENANCE

SITE #1	BLDG. #AS-122	MAINT & REPAIR DIV
#2	BLDG. # 1102	" " "
		PAIN'T SHOP
#3	BLDG. # 1202	GENERAL TRADES BRANCH
		ELECTRICAL SHOP
#4	BLDG. # 1700	UTILITIES DIV, STEAM
		GENERATION

FIELD MEDICAL SCHOOL

SITE #1	BLDG. #B-M308	ARMORY
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INFANTRY TRAINING SCHOOL

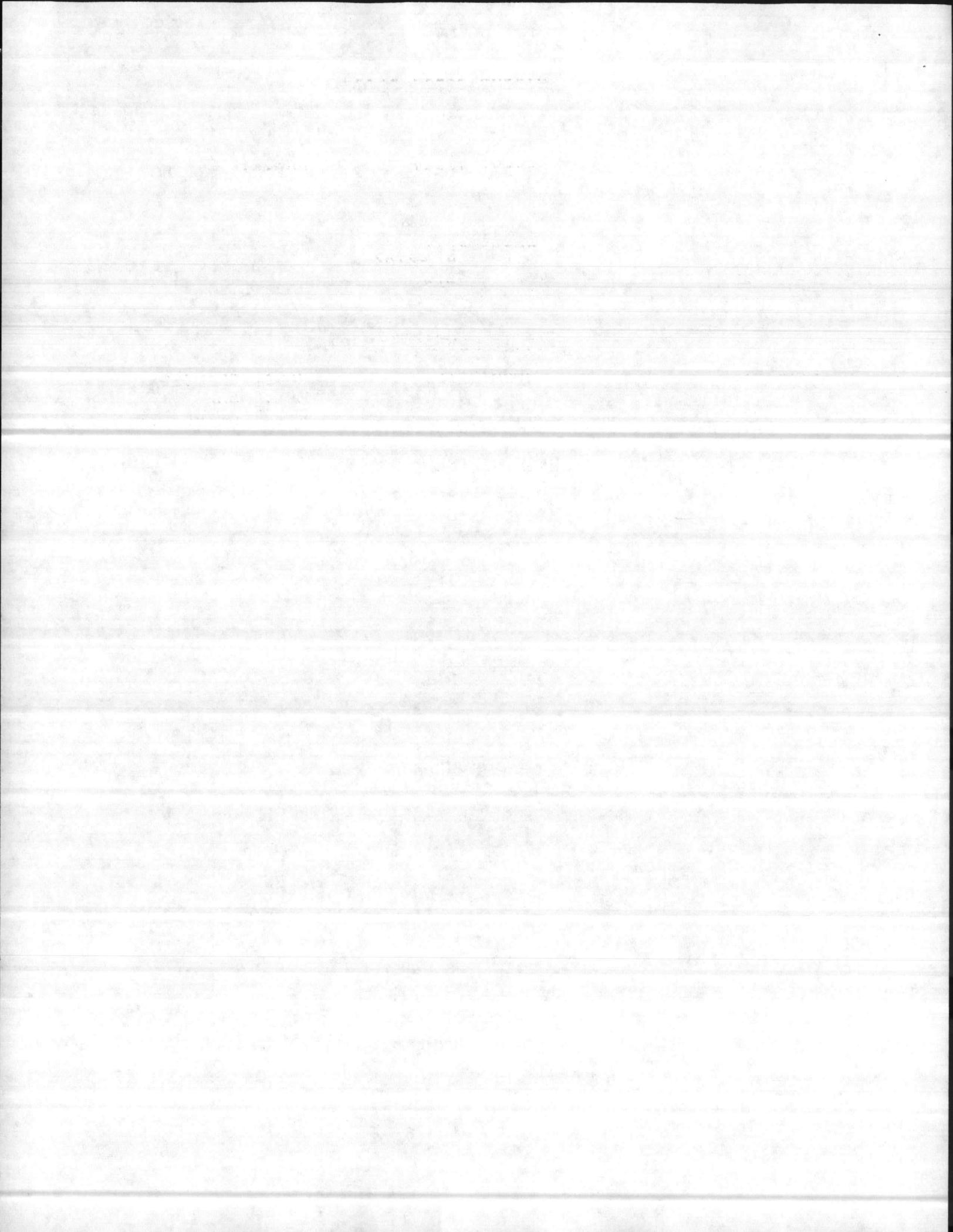
SITE #1	BLDG. #TC-816	ARMORY
#2	" #TC-817	COMM SHOP
#3	" #TC-820	ARMORY

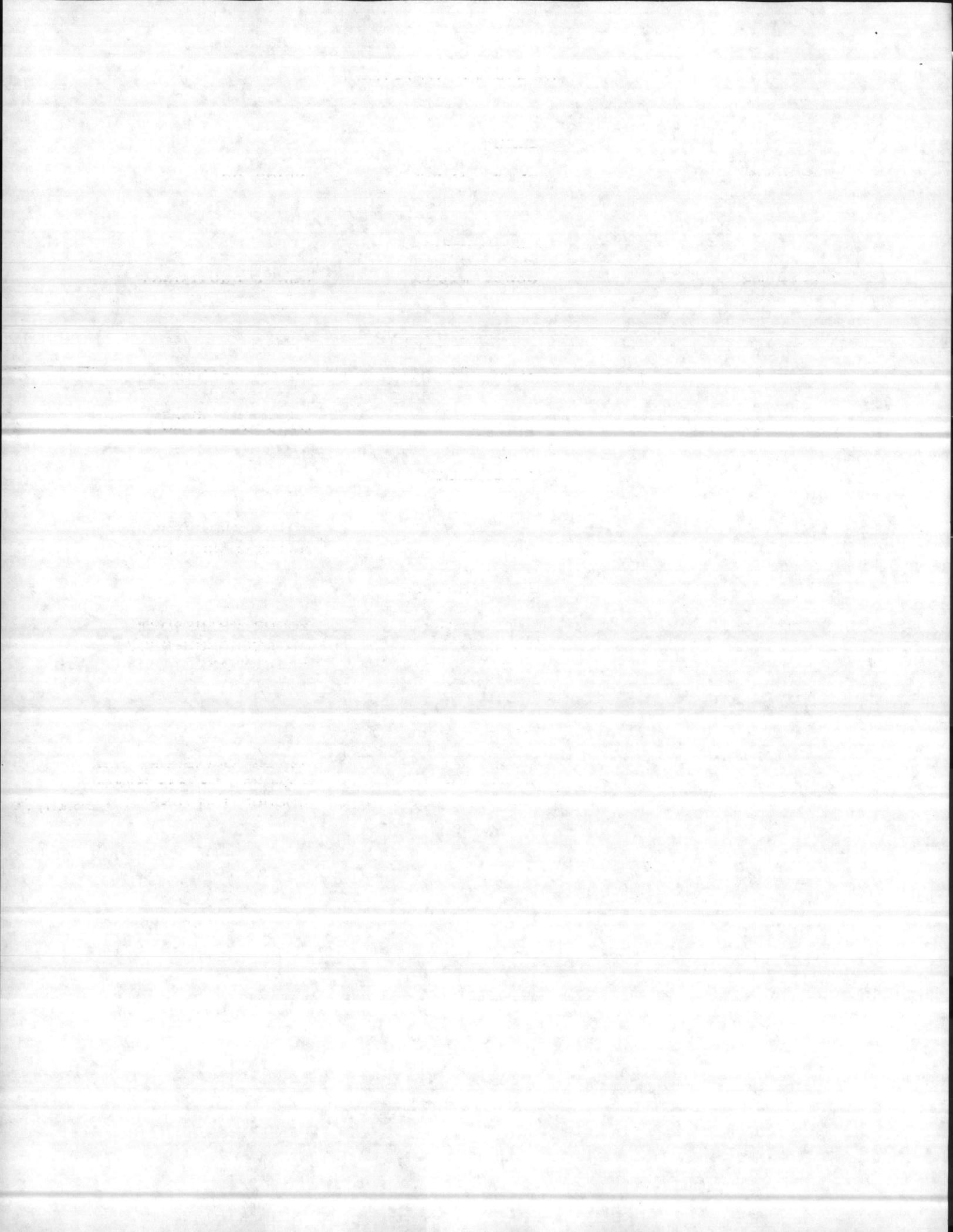
MCES

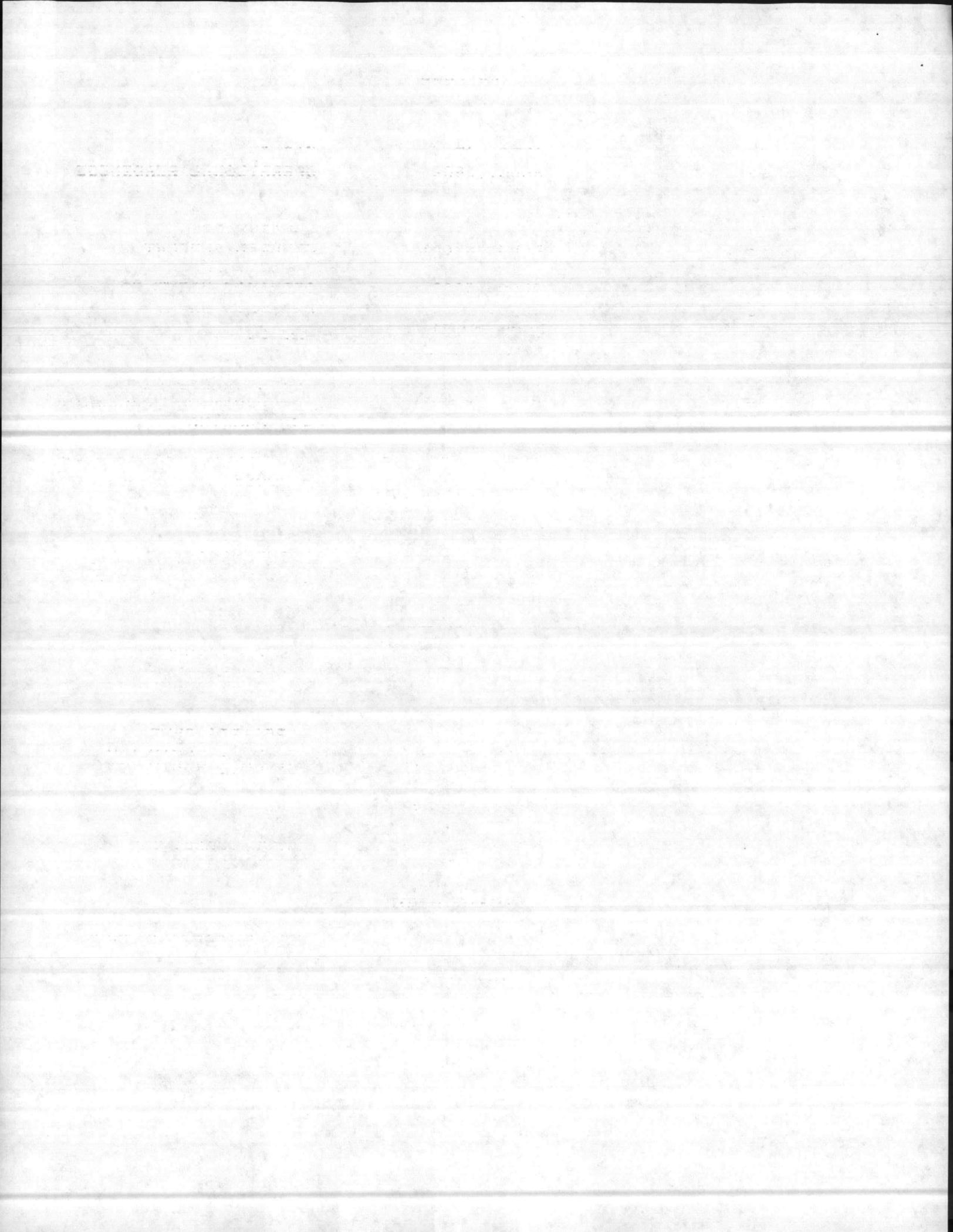
SITE #1	BLDG. #BB-49	ARMORY
#2	" #BB-51	MAINTENANCE
#3	" #BB-294	UTILITIES INST CO.

RESERVE SUPPORT UNIT

SITE #1	BLDG. #1111	MAINTENANCE FACILTY
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2D FSSG

2D MAINT BN

SITE #1	BLDG. #FC-40	H&S CO
#2	BLDG. #909	OPERATIONAL READINESS FLOAT
#3	BLDG. #1601	MOTOR TRANSPORT MAINT CO
#4	BLDG. #1601	GENERAL SUPPORT MAINT CO
#5	BLDG. #901	ORDNANCE MAINT CO
#6	BLDG. #902	ENGINEER MAINT CO
	BLDG #1771	ELVA CO.
	<u>2D SUPPLY BN</u>	

SITE #1	BLDG. #FC-263	MOTOR TRANSPORT CO
#2	BLDG. # 915	PRESERVATION, PACKAGING AND PACKING
#3	BLDG. # 916	DEPLOYMENT SUPPORT UNIT
#4	BLDG. #TP-457	FLAMMABLE STORAGE WARE- HOUSE

8th ENGINEERS SUPPLY

SITE #1	BLDG. #FC-200	MAINTENANCE
#2	BLDG. #GP-13	COMMUNICATIONS SHOP

8th COMMUNICATIONS BN

SITE #1	BLDG. #FC-100	MOTOR TRANSPORT & ELECTRONIC MAINT
#2	BLDG. #FC-100	MOTOR TRANSPORT & ELECTRONIC MAINT BATTERY ROOM
#3	BLDG. #1605	"A" CO., RADIO PLT
#4	BLDG. #1604	"B" CO., RADIO PLT

2D RADIO BN

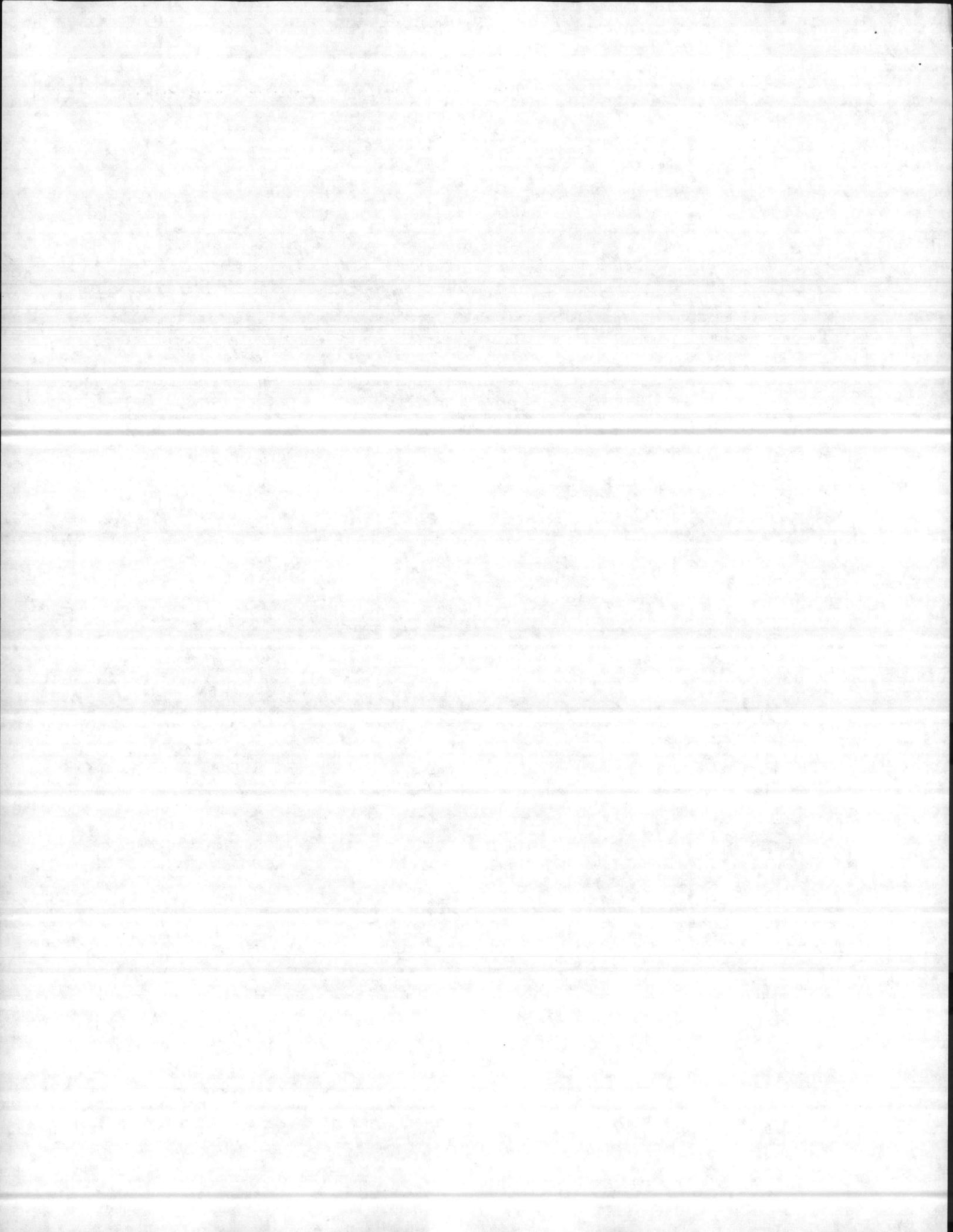
SITE #1	BLDG. #FC-241	MOTOR TRANSPORT
#2	BLDG. #FC-365	COMMUNICATIONS SHOP

FORECON CO

SITE #1	BLDG. #251	COMMUNICATIONS SHOP
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2D ANGLICO

SITE #1	BLDG. #FC-251	MOTOR TRANSPORT
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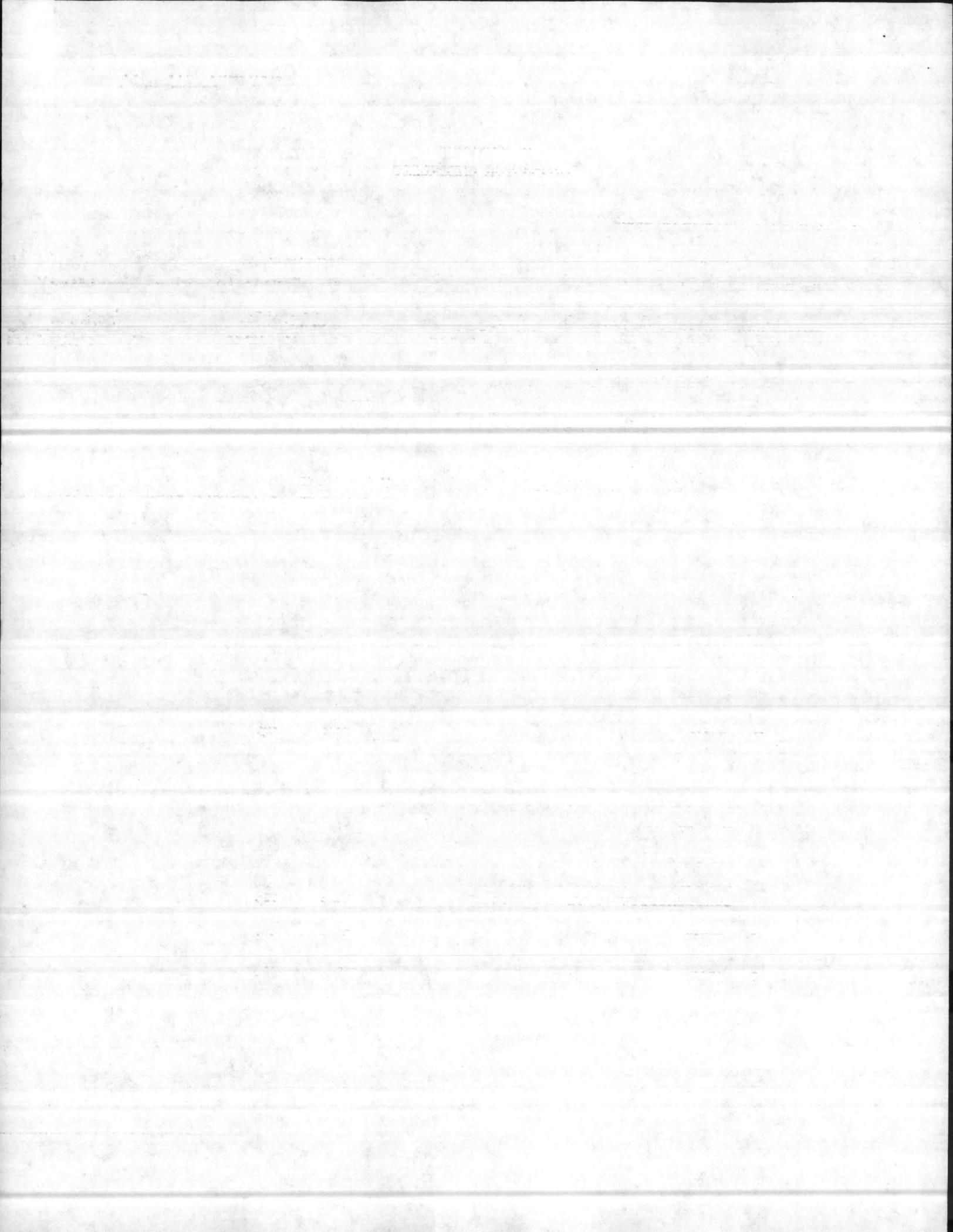


2DLOGSPTBN

SITE #1
#2
#3

BLDG. #FC-120
" #FC-302
BLDG. #1871

MOTOR TRANSPORT
ARMORY
COMMUNICATION SHOP



Inspector: D. Ellison
 Address: US EPA
R IX
 Telephone no: (404) 347-7603

RCRA LAND RESTRICTION
 F- SOLVENT
 GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

USMC
 A. Handler Name NE Highway 24 & US Highway 10
 B. Street (or other identifier)

Camp Lejeune NC
 C. City 28542
 D. State Onslow
 E. Zip Code F. County Name

Military
 G. Nature of business; Identification of Operations

NC 61700 22580
 H. EPA ID #

Danny Sharpe (919) 451-1690
 I. Handler Contact (Name and Phone Number)

II. Generator Compliance

A. F-Solvent Identification

Comments

1. Does the handler generate the following wastes?

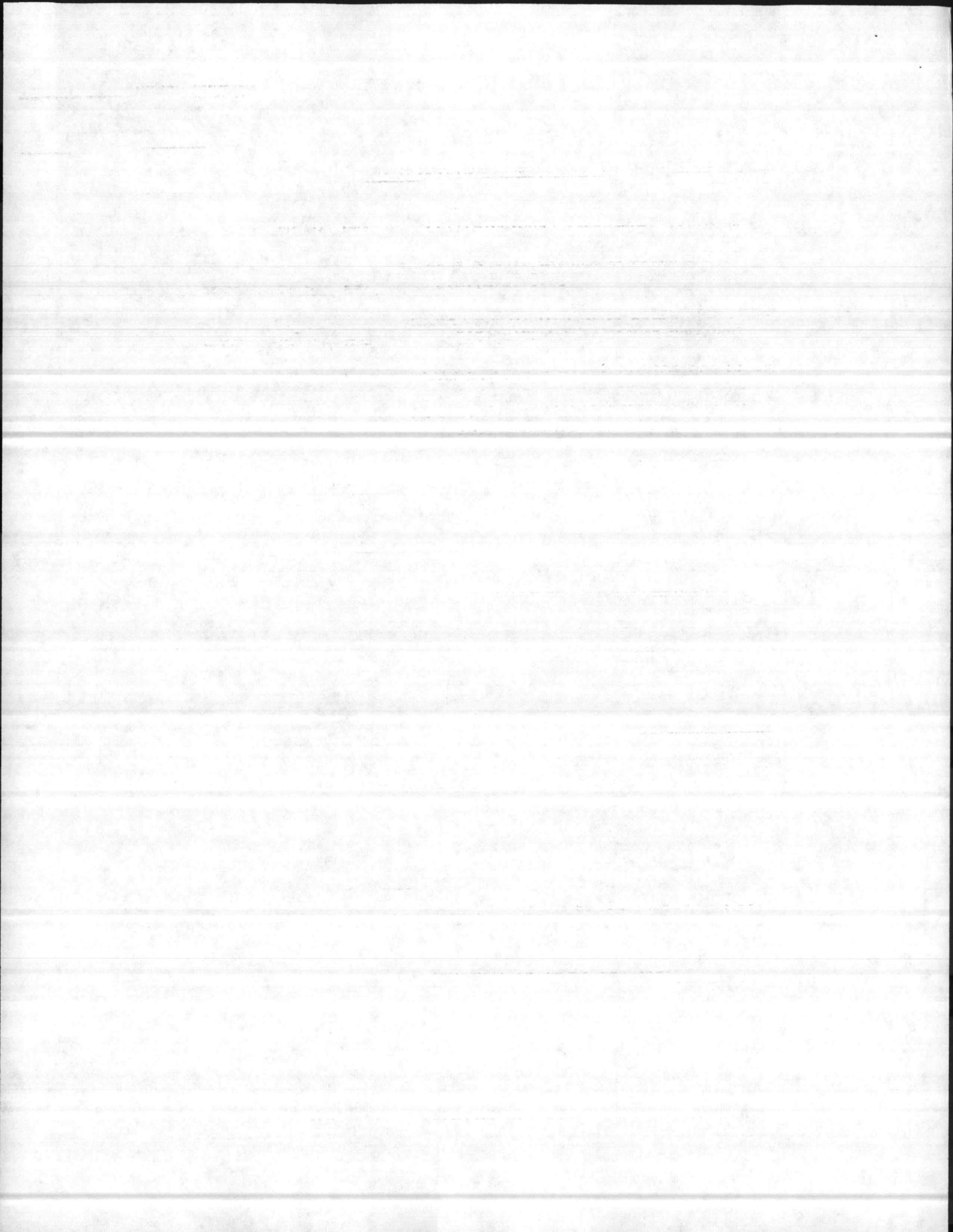
- a. F001 Yes No
- b. F002 Yes No
- c. F003 Yes No

If an F003 wastestream listed solely for ignitability was mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

- Yes No
- d. F004 Yes No
- e. F005 Yes No

2. Source of the above: Form 8700-12 ; Part A ; Part B ; Other (specify)

Appendix A is intended to assist the inspector and enforcement official in determining whether the handler is generating F-solvent wastes, if such wastes were not identified the handler previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below:



Handler Name: _____
ID Number: _____
Inspector: _____
Date: _____

B. National Variances and Extensions/Petitions

- | | <u>Comments</u> |
|--|---|
| 1. Is the waste generated by a Small Quantity Generator? [268.30(a)(1)] | ___ Yes <input checked="" type="checkbox"/> No |
| 2. Is the waste generated from a RCRA corrective action? [268.30(a)(2)] | ___ Yes <input checked="" type="checkbox"/> No ___ Some |
| 3. Is the waste generated from a CERCLA response action? [268.30(a)(2)] | ___ Yes <input checked="" type="checkbox"/> No ___ Some |
| 4. Is the solvent waste a solvent-water mixture, solvent-containing sludge, or solvent-contaminated soil containing less than one percent total F001-F005 constituents by weight? [268.30(a)(3)] | ___ Yes <input checked="" type="checkbox"/> No ___ Some |
| 5. Any extensions/petitions approved? | ___ <u>N/A</u> Yes ___ No |

C. BDAT Treatability Group - Treatment Standards Identification

1. Did the generator correctly determine the appropriate treatability group and treatment standards of the waste [§268.41]. Wastewaters containing solvents; spent methylene chloride in pharmaceutical wastewaters; all other spent solvent wastes? Yes ___ No

D. Waste analysis

1. Did the generator determine whether the waste exceeds treatment standards based on §268.7(a):
- a. knowledge of the waste Yes ___ No
- b. TCLP ___ Yes No

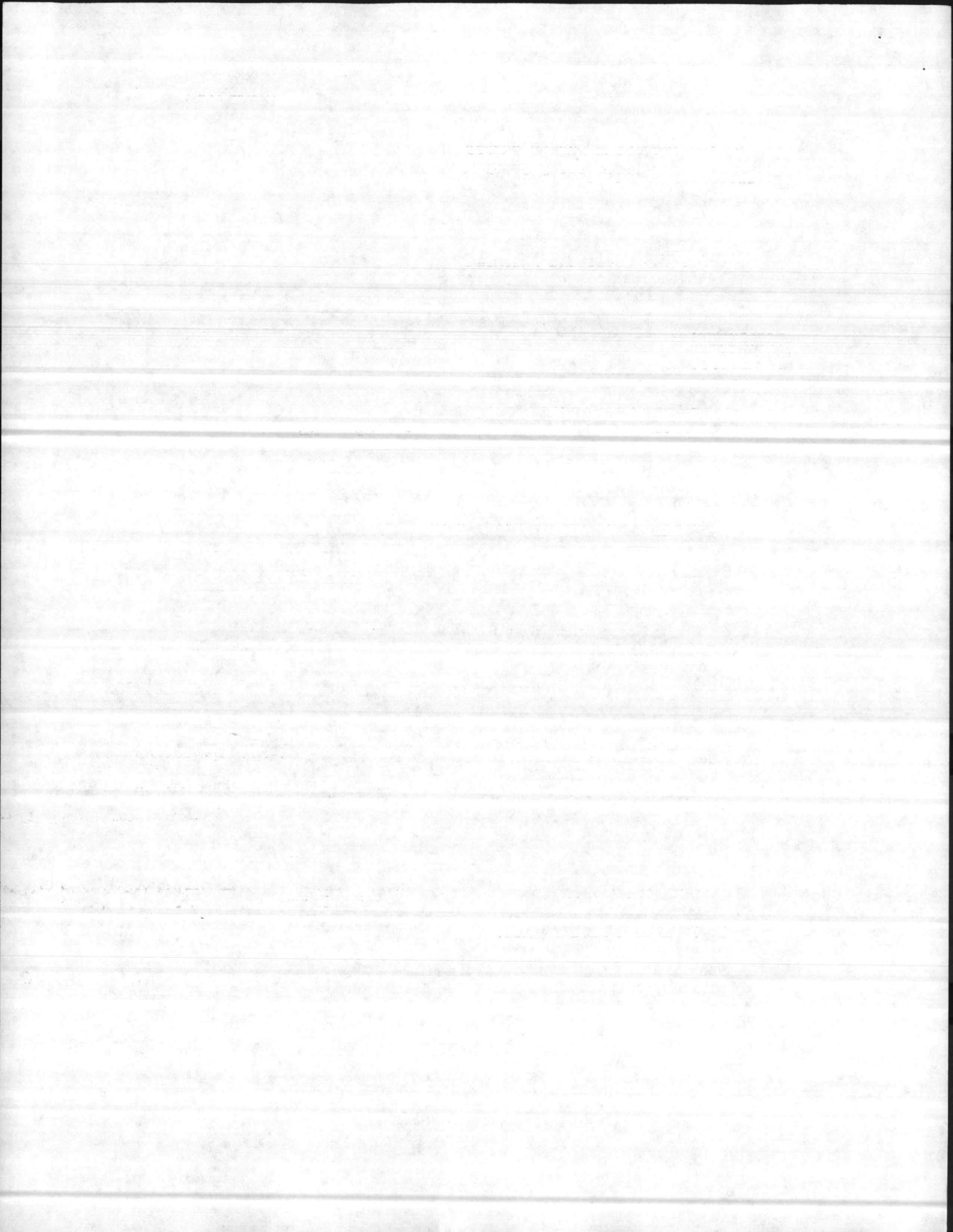
If knowledge, note how this is adequate: based on product used

If determined by TCLP, provide date of last test, frequency of testing, and attach test results.

Dates/frequency: _____

Note any problems: _____

- c. Were wastes tested using TCLP when a process or wastestream changes? ___ Yes No



Handler Name: _____
 ID Number: _____
 Inspector: _____

Comments

2. Did the F-solvent wastes exceed applicable treatability group treatment standards upon generation [§268.7(a)(2)]? Yes No Some
3. Did the generator dilute the waste or the treatment residual so as to substitute for adequate treatment [§268.3] Yes No

E. Management

1. On-site management

- a. Were F-solvent wastes managed on-site? Yes No

If yes, answer 1(b) and (c); if no, answer 2.

- b. For wastes that exceed treatment standards, was treatment, storage and/or disposal conducted? Yes No Storage

If yes, TSD Land Restriction checklist must be completed.

- c. Are test results maintained in the operating record? Yes No

2. Off-site management

- a. If F-solvent wastes exceed treatment standards, did generator provide treatment facility [268.7(a)(1)]:

- (i) EPA waste number? Yes No
- (ii) Applicable treatment standard? Yes No
- (iii) Manifest number? Yes No
- (iv) Waste analysis data, if available? Yes No

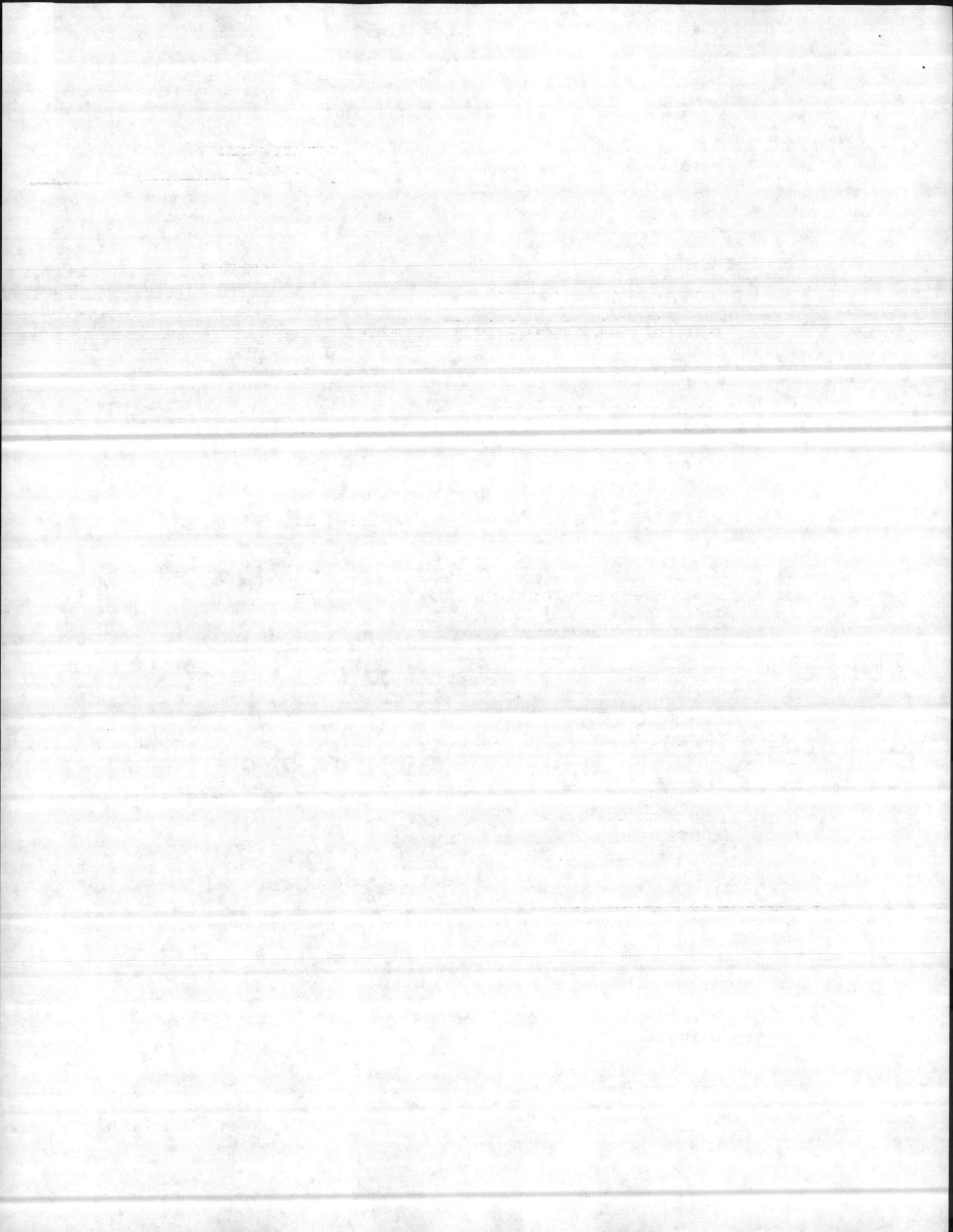
OK

says provided Had example but no copy for shipment on 1-12-87 manifest document #74

Example has all of them (Attached)

Turned up on 4/1/87 before left the Base

Identify off-site treatment facilities
 _____ NEW York - will no longer use _____



Handler Name: _____
 ID Number: _____
 Inspector: _____
 Date: _____

Comments

- b. If F-solvent wastes does not exceed treatment standards, did generator provide the disposal facility [268.7(a)(2)]: *NA*
- (i) EPA Hazardous waste number? Yes No
- (ii) Applicable treatment standard? Yes No
- (iii) Manifest number? Yes No
- (iv) Waste analysis data, if available? Yes No
- (v) Certification regarding waste and that it meets treatment standards? Yes No

Identify land disposal facilities receiving the BDAT certified wastes. _____

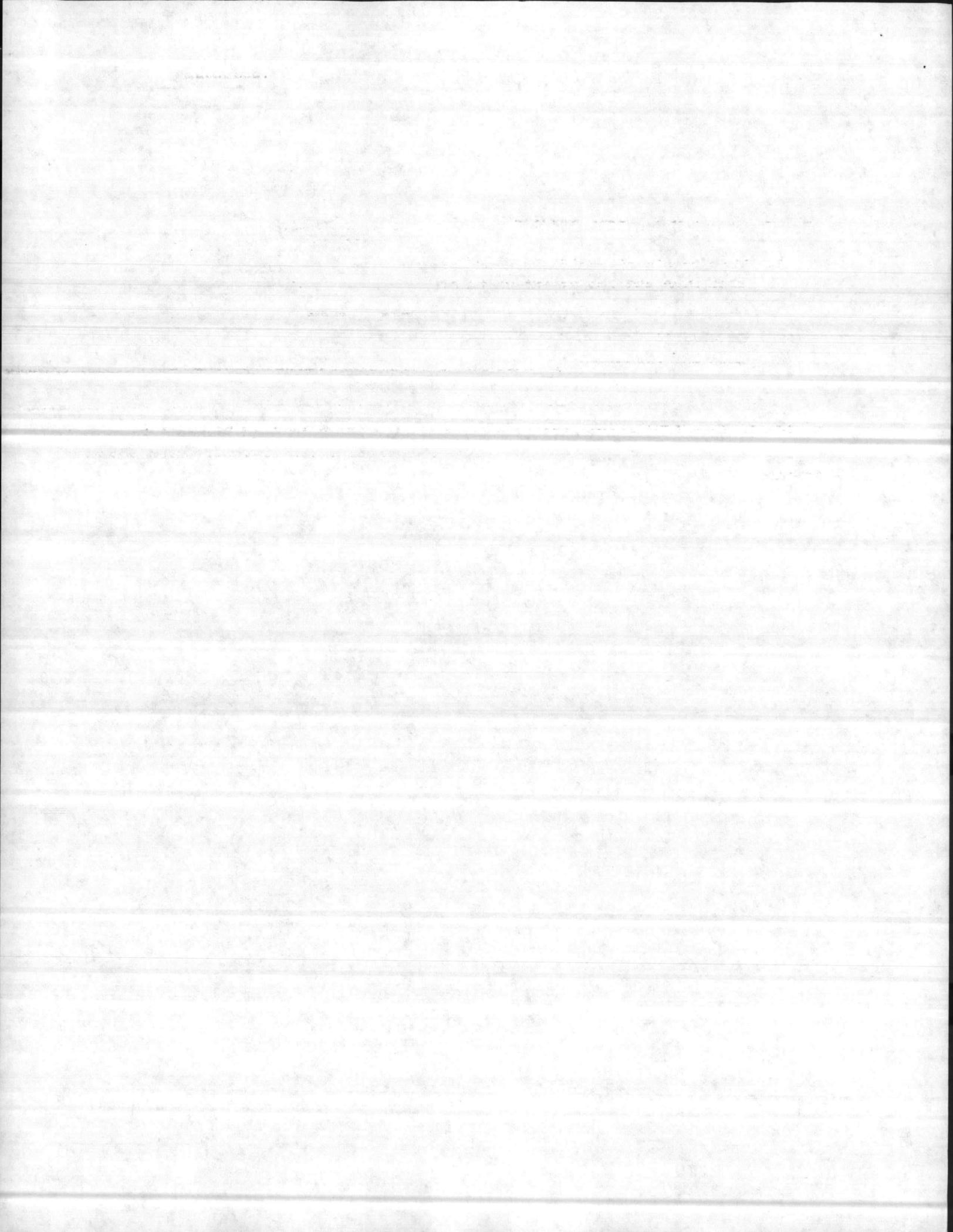
- c. If waste is subject to nation-wide variance (e.g., solvent-water mixtures less than 1%), extension (268.5) or petition (268.6) does generator provide notice to disposer that waste is exempt from land disposal restrictions [268.7(a)(3)]? *NA*
- Yes No

F. Storage of F-solvent waste

1. Was F-solvent waste stored for greater than 90 days (after variance 180/270 days for SQG)? *TSEDF*
- Yes No

If yes, was facility operating under interim status or permit? Yes No

If yes, TSEDF Checklist must be completed.



Handler name _____
ID Number _____
Inspector _____
Date _____

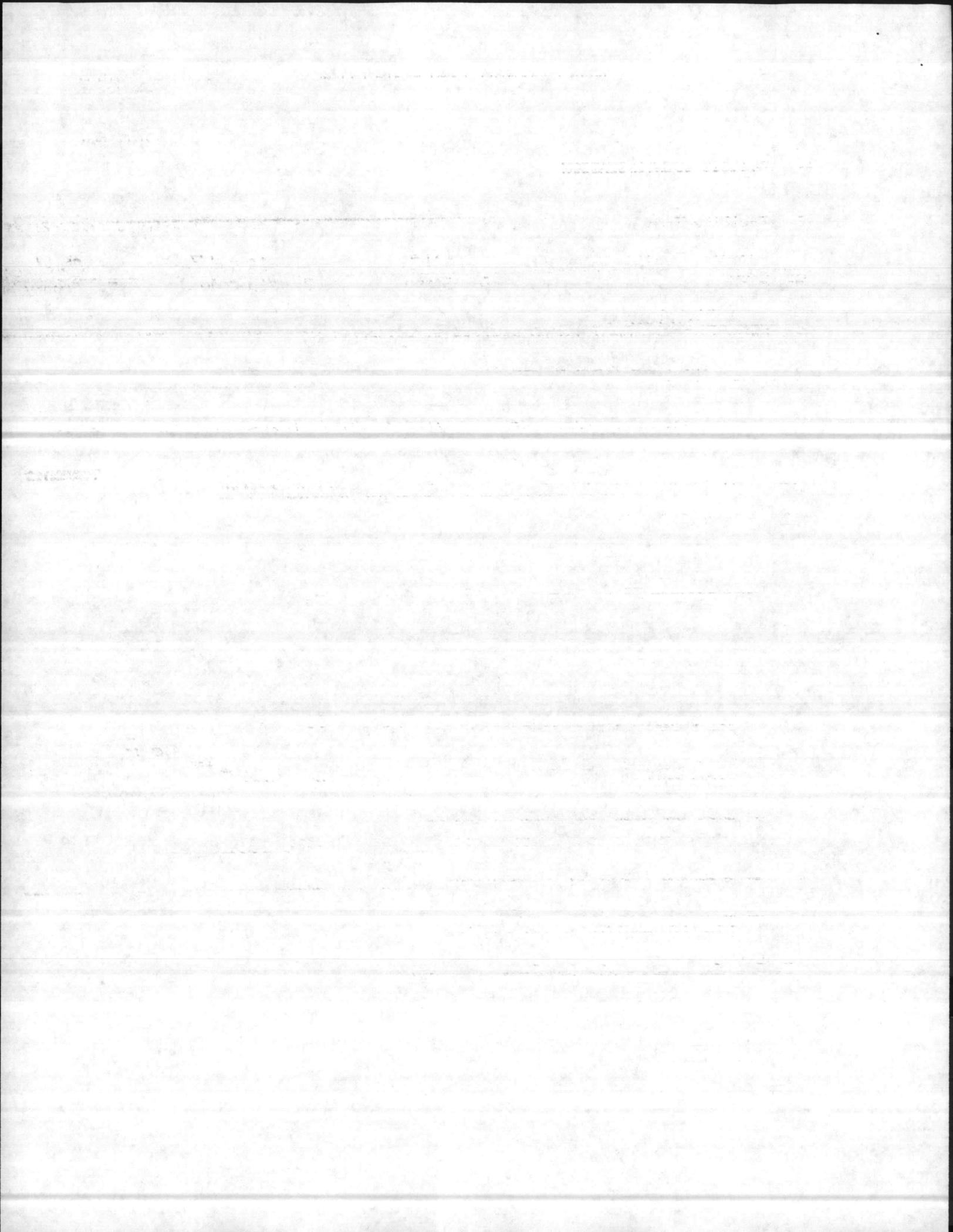
G. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Were treatment residuals generated from RCRA 264/265 exempt units or processes?

___ Yes No

If yes, list type of treatment unit and processes _____

Residuals from RCRA-exempt treatment units are subject to Land Disposal Restrictions Program. Ascertain whether residuals have been subjected to restriction program requirements.



RCRA F-SOLVENT LAND RESTRICTION

TREATMENT, STORAGE, AND DISPOSAL REQUIREMENTS CHECKLIST

D. Ellison
 Inspector Name
 RIV
 Address
 (404) 347-7603
 Tel. No.

I. FACILITY IDENTIFICATION

A. Facility Name Usme Camp Beyond B. Street (or other identifier) NC Highway 24 & US Highway
 C. City Jacksonville D. State NC E. Zip Code 28542 F. County Name Onslow
 G. Nature of business; identification of operations Military
 H. EPA ID # NC 617 0077 580
 I. Facility Contact (Name and Phone Number) Danny Shupe (919) 451-1690

II.A. For on-site facilities, complete the generator checklist Comments

B. General Facility Standards

1. Was waste analysis plan revised properly to cover Part 268 requirements [§264.13 or 265.13]? NOT REVISED BUT OK
 Yes No
2. Did facility obtain representative chemical and physical analysis of waste(s) and residues?
 Yes No
 - a. Did testing include analyses for all F001-F005 constituents?
 Yes No
 - b. Were analyses performed using TCLP?
 Yes No Product knowledge
 - c. Were analyses conducted onsite or offsite (identify offsite lab)? On Off: _____
 - d. Describe frequency of sampling: _____
 - e. Describe procedures used to identify manifest discrepancies _____
3. Are the waste analysis plans acceptable [§264.13/265.13]? Yes No
4. Are the operating records, including analyses and quantities, complete [§264.73/265.73]? Yes No

1944

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Facility: USMC
ID Number: _____
Inspector: D. Ellison
Date: 3-31-87
Comments

B. Storage (\$268.50)

1. a. Were F001-F005 wastes exceeding treatment standards stored? Yes No

If no, go to "C"

b. Are all containers and tanks clearly marked to identify contents and date(s) entering storage? Yes No

c. Do operating records track the location, quantity and dates wastes exceeding treatment standards entered and were removed from storage? Yes No

d. Do operating records agree with container/tank labeling? Yes No

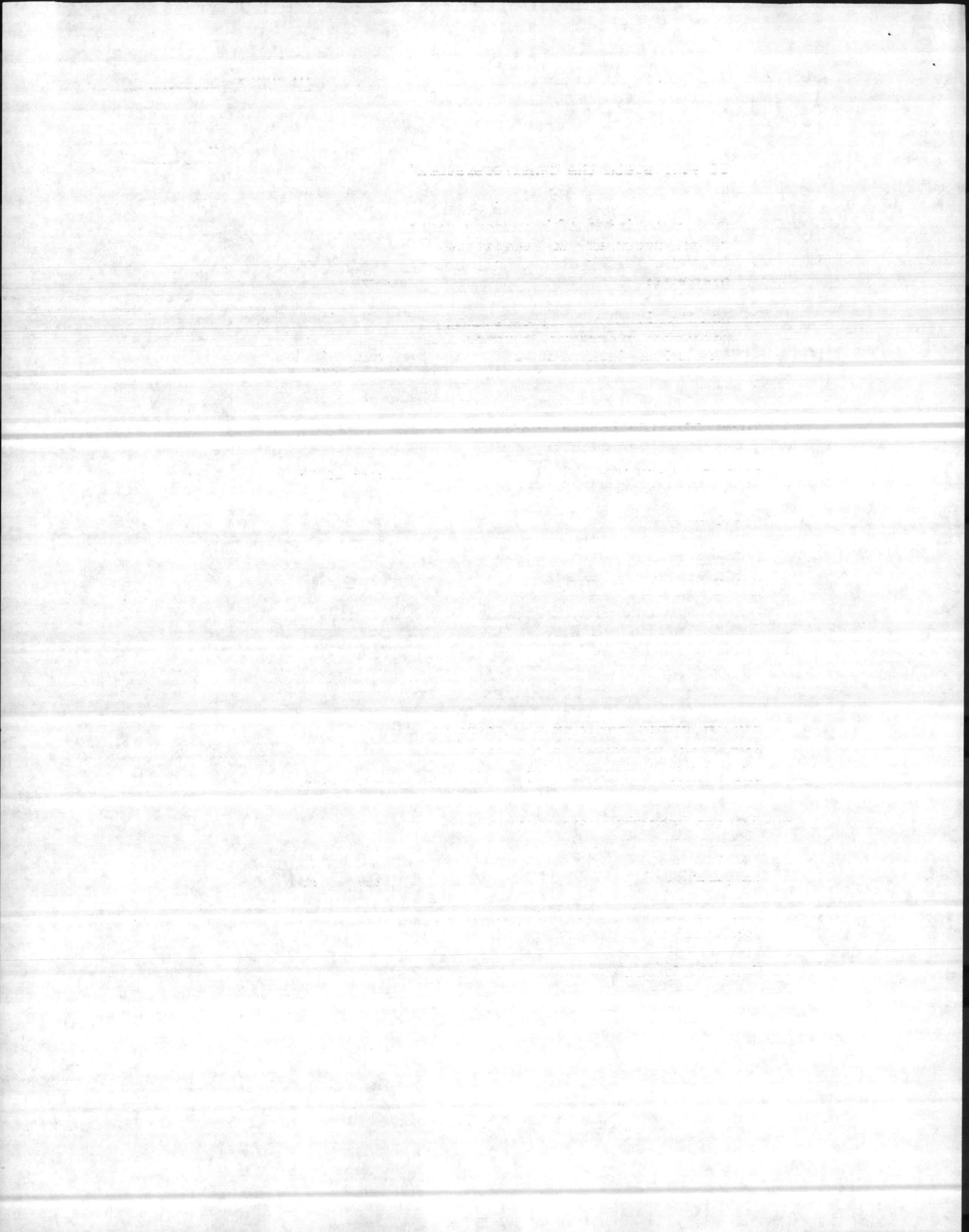
e. Is waste exceeding treatment standards stored for less than 1 year? Yes No

If yes, can you show that such accumulation is not necessary to facilitate proper recovery treatment or disposal? Yes No

If yes, state how: _____

f. Were tanks emptied and containers sent for treatment at least once per year, and do operating records show that the volume of waste removed from tanks annually at least equals tank volume? *NA*
 Yes No

g. Was/is waste exceeding treatment standards stored for more than one year? Yes No



Facility: _____
ID Number: _____
Inspector: _____
Date: _____

Comments

If yes, state the owner/operators' proof that such storage was solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal: _____

NA

h. Are F-solvent wastes exceeding treatment standards "stored" in surface impoundments? Yes No

C. Treatment in Surface Impoundments (§268.4) NA

1. Were F001-F005 wastes exceeding treatment standards placed in surface impoundments for treatment? Yes No

If no, go to "D"

2. Does the facility have acceptable evidence that treatment occurs in the impoundment? Yes No
If yes, note the evidence _____

3. Have representative samples of the sludge and supernatant from the surface impoundment been tested separately, acceptably and in accordance with the sampling frequency and analysis specified in the waste analysis plan, and are the results in the operating record? Yes No

4. Did the hazardous waste residue (sludge or liquid) exceed the treatment standards specified in §268.41? Yes No

5. Provide the frequency of analyses conducted on treatment residues: _____

6. Have the hazardous waste residues that exceed the treatment standards (§268.41) been removed adequately, and on an annual basis? Yes No DNA

Comments

THE UNIVERSITY OF CHICAGO

PHYSICS DEPARTMENT

PHYSICS 311

LECTURE 1

LECTURE 2

LECTURE 3

LECTURE 4

LECTURE 5

LECTURE 6

LECTURE 7

LECTURE 8

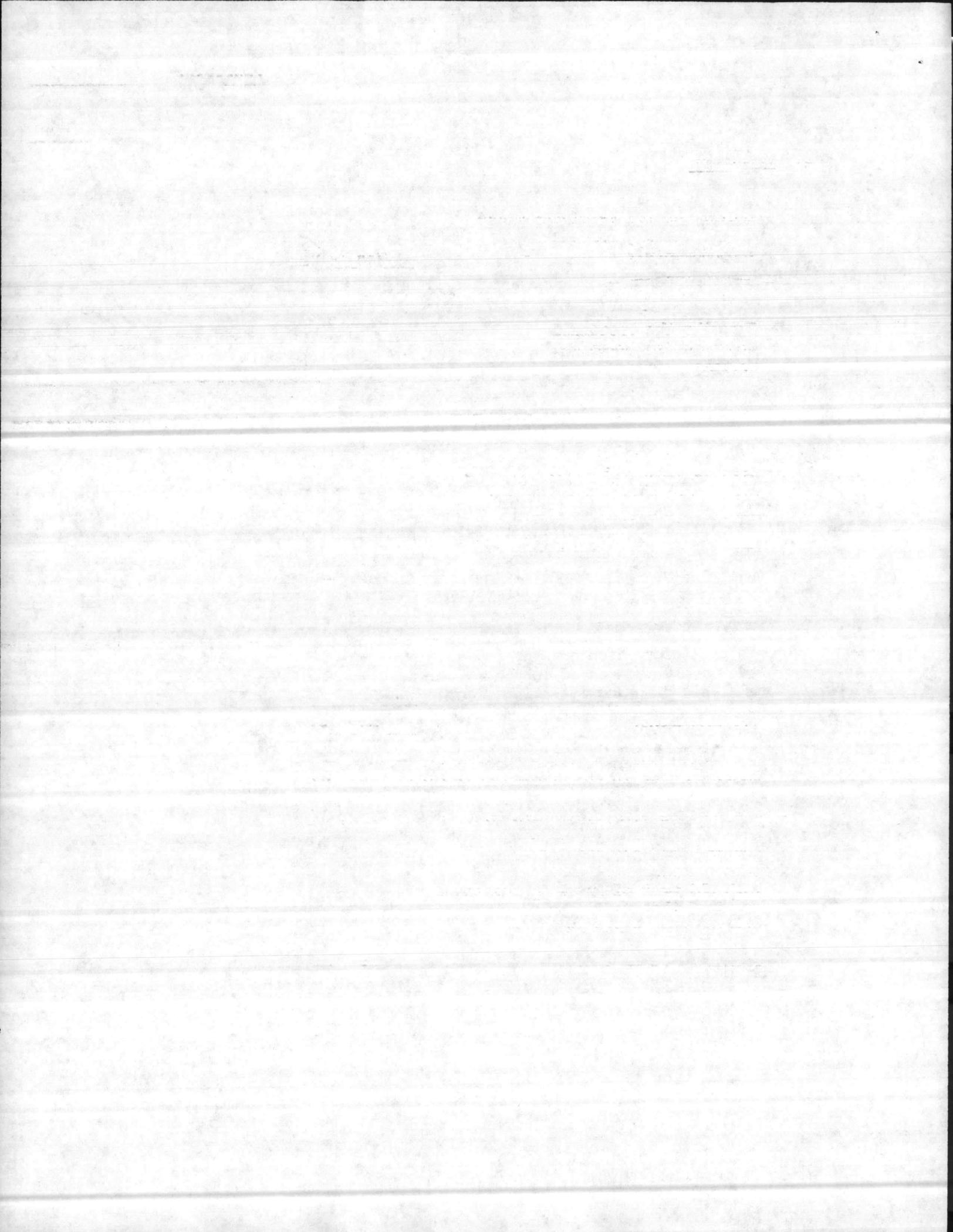
LECTURE 9

LECTURE 10

Facility: _____
ID Number: _____
Inspector: _____
Date: _____

- (a) If answer to 6 is no and supernatant is determined to exceed treatment concentrations, is annual throughput greater than impoundment volume? Yes No
7. If residues were removed annually, were adequate precautions taken to protect liners and do records indicate that inspections of liner integrity are performed? Yes No
8. When removed, were solvent wastes managed subsequently in another surface impoundment? Yes No
9. When removed, were wastes treated prior to disposal? Yes No
- (a) If yes, are waste residues treated on-site or off-site: Onsite Offsite
- (b) Identify management method: _____
-
10. Is the information on Nos. 3-9 above adequately documented in the waste analysis plan and operating record? Yes No
11. Have the minimum technology requirements (§264.221 or 265.221) been met? Yes No
- If the minimum technology requirements have not been met, has a waiver (268.4(a)(3)) been granted for that unit(s)? Yes No
12. Have the Subpart F ground-water monitoring requirements been met? Yes No
13. Did the facility submit a certification of compliance with minimum technology and groundwater monitoring requirements, and the waste analysis plan to the Agency? Yes No

Comments



Facility: _____
ID Number: _____
Inspector: _____
Date: _____

D. Treatment

1. Did the facility operate treatment facilities for F-solvent waste (not including surface impoundments)?

___ Yes No

If no, go to "E"

2. Describe the treatment processes for F-solvent wastes:

3. Does the facility, in accordance with an acceptable waste analysis plan, verify that the residue extract from all treatment processes for the F-solvent wastes are less than treatment standards [§268.7(b)]?

___ Yes ___ No

4. Describe frequency of testing of treatment residuals.

5. Was dilution used as a substitute for treatment?

___ Yes ___ No

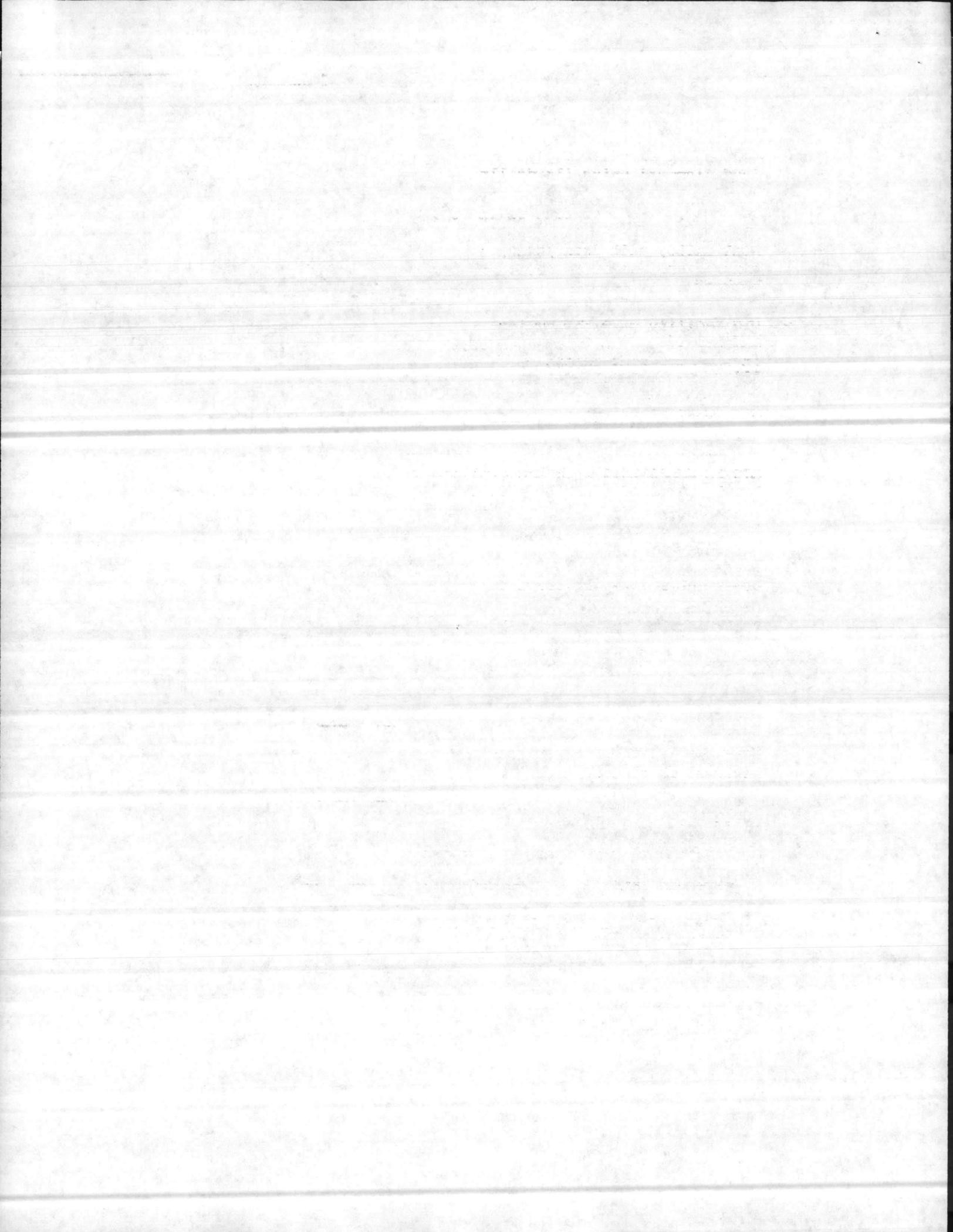
6. Are certifications and results of waste analyses kept in the operating record? ___ Yes ___ No

7. Are notices with waste number, treatment standard, manifest number, and analytical data (where available) submitted for each shipment of waste or treatment residual that meets the treatment stating that waste has been treated to treatment performance standards [§268.7(b)]?

___ Yes ___ No

8. Are certifications submitted for each shipment [§268.7(b)]?

___ Yes ___ No



Facility _____
ID Number _____
Inspector _____
Date _____

E. Land Disposal

1. Were F-solvent wastes placed in land disposal units (landfills, surface impoundments [for this question, do not include if in "C"] waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vault or bunker? Yes No

2. Did facility have the notice and certification from generators in its operating record [§§268.7(c); 268.7(a), (b)]? Yes No

3. Did the facility obtain waste analysis data through testing of the waste to determine that the wastes are in compliance with the applicable treatment standards [§268.7(c)] Yes No

If yes, at what frequency? _____

4. Were F-solvent wastes exceeding the treatment standards placed in land disposal units [268.30] (excluding national capacity variances [268.30(a)]) Yes No

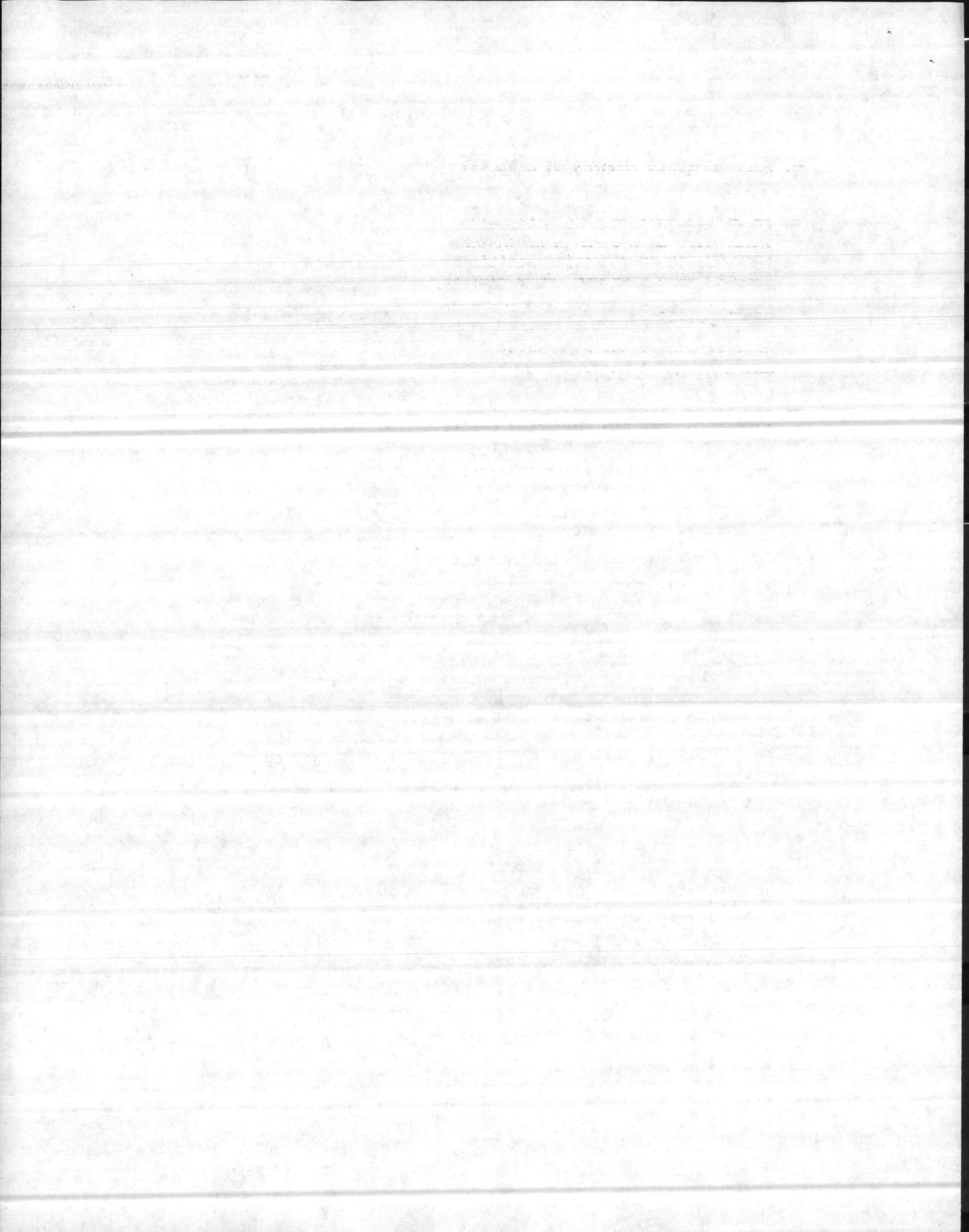
If yes, did facility have an approved waiver based on no migration petition [268.6] or approved case-by-case capacity extension [268.5] or variance [268.44] Yes No

5. Were F-solvent wastes subject to a national or case-by case capacity variance/extension disposed? Yes No

a. If yes, were these wastes disposed in a facility that has a new, replacement, or laterally expanded landfill or impoundment? Yes No

If (a) is yes, have the minimum technology requirements been met for all such units at the facility? Yes No

If (a) is yes, has the minimum technology requirements inspection been performed? Yes No



Facility _____

ID Number _____

Inspector _____

Date _____

Comments

6. Were adequate records of disposal maintained? Yes No
7. If wastes subject to a nationwide variances, case-by-case extensions [268.5], or no migration petitions [268.6] were disposed, does facility have notices [268.7(a)(3)] and records of disposal? Yes No
8. What is the volume of F-solvent waste disposed to date (by waste)? _____
9. If the facility has a case-by-case extension, can the inspector verify that the facility is making progress as described in progress reports? Yes No

