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UNITED STATES MARINE CORPS  
Marine Corps Base  
Camp Lejeune, North Carolina 28542-5001

BO 6240.5A  
NREAD/st  
10 Mar 1987



BASE ORDER 6240.5A

From: Commanding General  
To: Distribution List

Subj: HAZARDOUS MATERIAL DISPOSAL PROGRAM

Ref: (a) Resource Conservation and Recovery Act (Pub. Law 94-580) (42 USC 6901-6987) (NOTAL)  
(b) EPA Regulations contained in Code of Federal Regulations, Title: 40 Parts 260-265 (NOTAL)  
(c) DOT Regulations contained in Code of Federal Regulations, Title: 49 Parts 100-179 (NOTAL)  
(d) BO 11090.1B  
(e) BO 11320.1G

Encl: (1) Procedures for Collection, Storage and Turn-In of Hazardous Material and Hazardous Waste for Disposal  
(2) Responsibilities for Hazardous Material/Hazardous Waste Disposal  
(3) Hazardous Waste Training Requirements and Guidelines

1. Purpose. To revise responsibilities, procedures and guidance for hazardous material (HM) and hazardous waste (HW) disposal and related environmental protection for the Camp Lejeune and Marine Corps Air Station, New River complex.

2. Cancellation. BO 6240.5.

3. Background

a. Congress and the state legislatures have responded to the threats to human life and the environment caused by mismanagement and illegal spilling and dumping of toxic substances by enacting laws which not only attempt to avert future threats but which impose civil and criminal penalties. In enacting many of these environmental laws, Congress waived federal supremacy, requiring federal agencies including the Marine Corps, to comply with federal, state and local environmental laws. Federal officers and employees now face the possibility that they may be personally liable for civil and criminal penalties and fines as well as imprisonment.

b. The Environmental Protection Agency (EPA) has authorized the State of North Carolina to enforce the requirements of references (a) and (b) through a state HW regulatory program. The Solid and Hazardous Waste Management Branch, Division of Health Services (DHS), is the primary enforcing agency within North Carolina. DHS enforcement personnel have authority to investigate HW spills and perform routine inspections of work sites where HW are handled and stored. These investigations and inspections can result in citations being issued to supervisors and/or personnel at the work site for civil and/or criminal violations of HW regulations.

c. State regulations promulgated under reference (a) and EPA regulations contained in reference (b) require both initial and annual refresher training for personnel involved in HW management and handling. The majority of discrepancies identified during EPA and DHS inspections can be directly, or indirectly, attributed to lack of adequate HW training. The relatively rapid rate of personnel turnover within the Camp Lejeune Complex requires that HW training be readily available. Publishing of this revised order is an essential step in strengthening the subject program. In addition to addressing the HW training issues, this revised order provides for the following: (1) better internal controls by organizations generating and handling HW; (2) improved availability of HW related supplies and equipment and; (3) formalizing efforts to reduce the volume and toxicity of HW generated within the Camp Lejeune Complex. Enclosures (1) through (3) outline revised procedures for managing HW and providing compliance with related requirements of references (a), (b) and (c).



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d. This order formally establishes two collateral duty positions to coordinate and to assist with the implementation of the subject program. These positions are the Hazardous Material Disposal Coordinator (HMDC) and Hazardous Material Disposal Officer (HMDO). HMDC will be established within each major command and within Marine Aircraft Groups. HMDO's will be appointed at the Battalion, Separate Company and Squadron level (or equivalent). HMDC and HMDO responsibilities are outlined in enclosure (2). The appointment and training of qualified primary and alternate HMDCs and HMDOs are essential to implementation of the complex requirements of the subject program.

4. Action

a. Organizational commanders shall on a continuing basis take action required to implement the following HW management goals and objectives:

(1) HW operations will be supervised by properly trained personnel who have access to equipment and supplies required for handling HW.

(2) Written descriptions of HW duties will be developed for all HW managers and handlers, and appropriate records maintained to document that proper training is being provided to personnel in accordance with enclosure (3).

(3) OIC/NCOIC's will ensure that HW facilities are inspected weekly and timely corrective action is taken and properly documented per this Order and related instructions of HMDO/HMDC.

(4) OIC/NCOIC's will prepare a written HW management Standard Operating Procedure (HWMSOP) in cooperation with HMDO for each facility where HW are routinely handled and stored. SOP will be readily available at HW generation and storage sites.

(5) A system of continuous internal controls will be implemented to ensure that violations of this Order are identified and if appropriate, that disciplinary action is taken to discourage recurring violations.

b. Major commands will take action required to limit HW generation to the minimum number of locations practical, to identify HW handling and storage equipment and facilities requirements and to develop and implement a system of internal controls which provides satisfactory compliance with the requirements of this Order and related regulatory requirements. As a minimum the following action will be taken:

(1) Appoint a primary and alternate HMDC with authority and resources to implement duties outlined in enclosure (2).

(2) Maintain a current listing/directory of facilities where HW are handled and stored. Ensure timely submission of waste identification documents per enclosure (1).

(3) Require OIC/NCOIC's of HW handling and storage facilities to develop and implement a written HW SOP for each facility per enclosures (1) and (3). The SOP will be readily available to personnel routinely handling HW and related emergency response.

(4) Require Commanding Officers of each Aircraft Squadron, Regiment, Battalion and Separate Company (or equivalent) to appoint a primary and alternate HMDO with authority to carry out the duties outlined in enclosure (2).

(5) Establish and promote HW management goals and objectives for supply and maintenance functions which promote the minimization of the volume and toxicity of HW generation.

(6) Within 30 days of the date of this Order, and as requested thereafter, provide a current listing of Primary and Alternate HMDO's. The list shall contain name, rank, unit and phone number. The list will be provided to the Director, Natural Resources and Environmental Affairs Division, Marine Corps Base.

c. Director, Natural Resources and Environmental Affairs Division, will inspect all points of HW generation on an annual basis, or more frequently as required, to monitor and evaluate compliance with the order and related state/federal regulations. The results of the annual inspections will be provided in writing to the inspected activity via the chain of command.

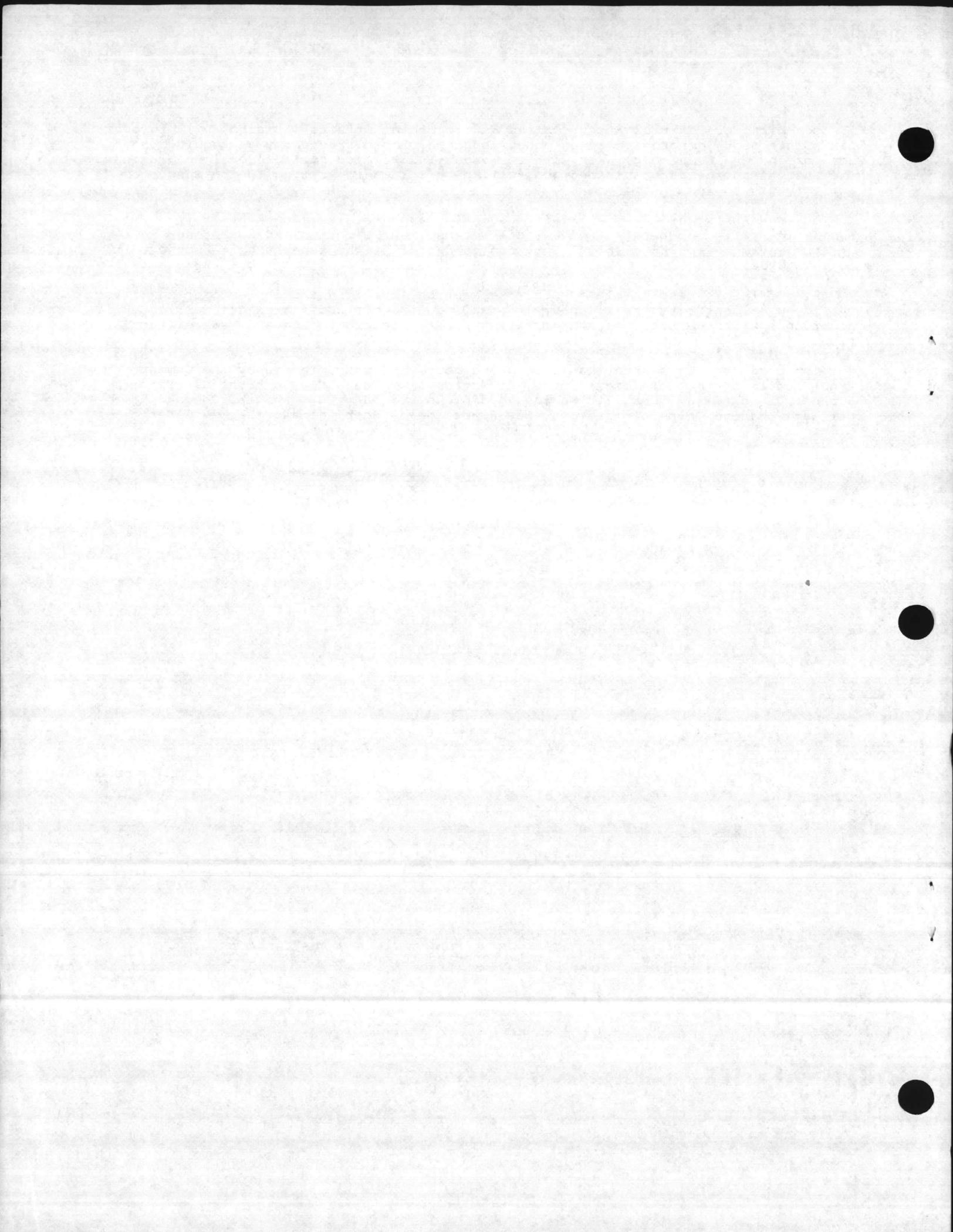
d. The Assistant Chief of Staff, Logistics and Assistant Chief of Staff, Facilities will cooperate with the local Defense Reutilization and Marketing Officer in improving HW disposal services to organizations generating HW subject to this Order.

e. Officials responsible for the preparation, awarding and implementation of various types of contracts, shall ensure that all contractor activities are carried out in accordance with the requirements of this Order and related State and Federal regulations.

5. Concurrence. This Order has been coordinated and concurred in by the Commanding Generals, II Marine Amphibious Force, 2d Marine Division, FMF, 2d Force Service Support Group (Rein), FMF, 6th Marine Amphibious Brigade, FMF, and the Commanding Officers, Marine Corps Air Station, New River, Naval Hospital and the Naval Dental Clinic.

  
M. C. HARRINGTON  
Chief of Staff

DISTRIBUTION: A  
NREAD 300



PROCEDURES FOR COLLECTION, STORAGE AND TURN-IN OF HAZARDOUS  
WASTE (HW) AND HAZARDOUS MATERIAL (HM) FOR RECYCLING OR DISPOSAL

1. Hazardous Waste Management Standard Operating Procedures (HWMSOP). Each organization routinely generating or handling HW or disposing of HM will develop desk top procedures to be followed. As a minimum, the HWMSOP will provide the following:
  - a. Name and telephone number of cognizant Hazardous Material Disposal Officer (HMDO) and Hazardous Material Disposal Coordinator (HMDC).
  - b. A copy of BO 6240.5A, BO 11090.1B, BO 11090.3, and related local instructions.
  - c. Name, title, HW duties and HW training records for each employee per enclosure (3) of BO 6240.5A.
  - d. Waste Identification Document (WID) for each HW generated or handled. WID will be completed in accordance with attachment (A) of this enclosure.
  - e. Procedures and responsibilities for dealing with HW/HM spills and related emergencies, i.e., HW Spill Contingency Plan.
  - f. Copies of weekly inspections of HW storage areas/containers.
  - g. Guidance provided by HMDO/HMDC's to implement HW/HM disposal program.
  - h. Location sketch for each HW generation, accumulation and storage area.
  - i. Material Safety Data Sheets, or hard copy of Hazardous Material Information Systems Data developed per MCO 5100.25 for all HW generated.
  - j. Sample copies of completed turn-in documents (Form DD-1348-1) and HW labels for each type of HW generated and disposed of.
2. HM/HW Collection and Storage Procedures/Requirements.
  - a. Possession of a properly completed and signed WID constitutes authorization to generate the specifically named HW. Failure to submit a WID to HMDC within 30 days of date HW first generated or handled or 60 days of the date of this Order (whichever is later) will be considered a violation of this Order. HMDC's are responsible for monitoring and enforcement of this requirement.
  - b. Only Department of Transportation (DOT) approved containers labeled per WID or HWMSOP will be used for storage of HW awaiting disposal. HMDO's are responsible for enforcing this standard.
  - c. All personnel routinely handling or responsible for HW management must be properly trained per this Order and references (a) and (b). OIC's are responsible for maintaining training records for personnel within their cognizance. HMDC's are responsible for enforcement of this requirement.
  - d. All HW containers and storage areas will be inspected weekly using format provided by cognizant HMDC/HMDO. A written record of corrective action will be maintained per HMDO/HMDC guidance. Director, Natural Resources and Environmental Affairs Division, (NREAD), MCB will assist HMDC/HMDO develop guidelines.
  - e. Spills of HW/HM will be promptly reported to the Base Fire Department at the Emergency Telephone Number 451-3333. OIC's are responsible for maintaining absorbents, safety equipment, and other supplies and equipment required for dealing with minor spills. HWMSOP's will give specific guidance in this area.
  - f. A Form DD-1348-1 will be completed and submitted to the cognizant HMDO not later than 45 days after the "accumulation start date" on the HW label on the container.

ENCLOSURE (1)

g. HMDC will be notified by telephone, confirmed in writing, of anytime DRMO has not accepted accountability of a HW within 75 days after the "accumulation start date" on any HW container.

3. Hazardous Material (HM) and Hazardous Waste (HW) Turn-in Procedures. The following steps will be taken to initiate final disposal of HM/HW. At any time that a major problem or controversy arises, the organization attempting to turn-in the item will immediately notify the responsible Hazardous Material Disposal Coordinator (HMDC). The HMDC will be responsible for coordinating efforts to resolve the problem/controversy and will utilize the assistance of the Director, Natural Resources and Environmental Affairs Division (NREAD), Facilities Department, Marine Corps Base, telephone extension 2083, 2195. Unresolved problems/controversies will be referred to the Assistant Chief of Staff, Facilities, Marine Corps Base. See Note 1 below.

STEP 1. The Officer in Charge (OIC) of the organization having physical custody of HM/HW is responsible for turn-in of HM/HW unless otherwise specified by HMDC. OIC will properly containerize the HM/HW and submit a Form DD 1348-1 to the cognizant Hazardous Material Disposal Officer (HMDO) per instructions in organization's HWMSOP. Questions not addressed by HWMSOP will be directed to HMDO.

STEP 2. The HMDO will physically inspect the HM/HW and determine if the Form DD 1348-1 is properly completed and the HM/HW is properly packaged. The HMDO will coordinate correction of any problems. Unresolved problems will be referred to cognizant HMDC for resolution. Once problem's resolved, HMDO will forward (preferably hand deliver) the Form DD 1348-1 to the Defense Reutilization and Marketing Office (DRMO) Headquarters, Bldg. 906. See Note 2 below.

STEP 3. The DRMO will inspect the HM/HW if necessary, and will determine if DRMO is accountable (i.e., responsible) for disposal of the HM/HW. If DRMO determines that the local activity, not DRMO, has responsibility for disposal of the HM/HW, the DRMO will so notify the cognizant HMDC in writing with a copy to the NREAD. The HMDC and NREAD will cooperate in developing case specific procedures for disposal of the item. Assistant Chief of Staff, Logistics, MCB, will provide contracting support.

STEP 4. If DRMO determines that DRMO is accountable for HM/HW, DRMO will determine where the HM/HW will be stored awaiting disposal. HW must be stored at the DRMO facility at TP-451 complex, unless otherwise approved by the Assistant Chief of Staff, Facilities, MCB. DRMO will submit a request to the Assistant Chief of Staff, Logistics to arrange transportation of the HM/HW to DRMO designated facility.

STEP 5. Assistant Chief of Staff, Logistics, in cooperation with HMDO, will determine if generating organization can safely, legally transport the item to DRMO designated facility. Assistant Chief of Staff, Logistics will supervise transportation of HW. Whenever practical, Command turning in a HM will provide transportation. Assistant Chief of Staff, Logistics will cooperate with the HMDC for the generating organization in promoting efficient, safe transportation. Spills or other emergencies will be promptly reported to the Base Fire Department at 451-3333. Drivers will be provided written spill prevention and response guidance.

STEP 6. When the HM/HW arrives at storage facility, DRMO will inspect prior to unloading. DRMO is authorized to refuse the HM/HW if any significant discrepancies exist. DRMO will immediately notify cognizant HMDC and NREAD of DRMO's refusal to accept the HM/HW. The transporting vehicle will be secured and will not be moved outside the immediate vicinity of DRMO facility except for emergency situations involving risk to public safety or to property. DRMO, HMDC and NREAD will cooperate in making an immediate decision on corrective action. If problems cannot be promptly resolved the HM/HW will be returned to the generating organizations facilities. When DRMO accepts physical custody of the HM/HW, turn-in is complete.

NOTE 1: Marine Corps Air Station, New River units will follow turn-in procedures set forth in Air Station Order 6280.1.

NOTE 2: HMDO should maintain a log of documents showing date document accepted by DRMO, accumulation start dates, and the type and quantity of HW.

ENCLOSURE (1)

WASTE IDENTIFICATION DOCUMENT (WID)

DATE \_\_\_\_\_

WID # \_\_\_\_\_

1. GENERATING WORK CENTER INFORMATION

Shop \_\_\_\_\_ Contact \_\_\_\_\_ Command \_\_\_\_\_ Building \_\_\_\_\_ Phone Ext. \_\_\_\_\_

2. WASTE IDENTIFICATION

a. WASTE NAME: Common \_\_\_\_\_ Chemical(s) \_\_\_\_\_

b. PHYSICAL FORM: (CHECK)  Liquid  Solid  Sludge  Other (Specify) \_\_\_\_\_

c. MANUFACTURER: \_\_\_\_\_ d. NATIONAL STOCK NUMBER: \_\_\_\_\_

e. CONTAINER: (TYPE AND SIZE) \_\_\_\_\_

f. GENERATION RATE: (e.g., gal/day, lbs/day) \_\_\_\_\_

g. FREQUENCY OF GENERATION \_\_\_\_\_

h. EXPECTED ANNUAL GENERATION: (GALS, LBS) \_\_\_\_\_

i. DESCRIBE WASTE GENERATION PROCESS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

j. HAS WASTE BEEN MIXED WITH ANY OTHER MATERIAL?  Yes  No If yes, specify \_\_\_\_\_  
\_\_\_\_\_

3. REASON FOR DISPOSAL: (CHECK)

Exceeded shelf life  Served intended purpose  Unused  Other  
(specify) \_\_\_\_\_

4. REQUEST FOR WASTE CHARACTERIZATION BY NREAD: I am unable to properly classify the above waste. NREAD assistance is requested. Cost of Laboratory Analysis should be charged to the following Cost Account Code. \_\_\_\_\_

\_\_\_\_\_  
HMDO \_\_\_\_\_ DATE  
Signature

5. CERTIFICATION: I certify that the above named materials are the only compounds in the waste containers listed above and have not been mixed with any other materials.

\_\_\_\_\_  
HMDO \_\_\_\_\_ DATE  
Signature

Appendix A to  
ENCLOSURE (1)

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TO BE COMPLETED BY THE HMDC AND COPIES SENT TO THE HMDO, DRMO, AND DIRECTOR, NREAD

6. WASTE CHARACTERIZATION: DATE COMPLETED \_\_\_\_\_ LAB REPORT # \_\_\_\_\_

7. WASTE CLASSIFICATION: \_\_\_\_\_ Hazardous \_\_\_\_\_ Nonhazardous

8. EPA WASTE NUMBER(S): \_\_\_\_\_

9. REASON FOR HAZARD CLASSIFICATION: \_\_\_\_\_

10. HANDLING INSTRUCTIONS: \_\_\_\_\_

11. DTID 1348-1 REQUIRED: \_\_\_\_\_ Yes \_\_\_\_\_ No

12. CONTAINER AND LABELING REQUIREMENTS:

a. DOT/DOD CONTAINER TYPE: \_\_\_\_\_

b. DOT PROPER SHIPPING NAME: \_\_\_\_\_

c. DOT HAZARD CLASS: \_\_\_\_\_

d. UN/NA NUMBER: \_\_\_\_\_

e. ADDITIONAL REQUIREMENTS: (FOR DRMO) \_\_\_\_\_

13. SPECIAL PRECAUTIONS AND/OR INSTRUCTIONS: \_\_\_\_\_

14.

\_\_\_\_\_  
HMDC Code Date  
Signature

RESPONSIBILITIES FOR HAZARDOUS MATERIAL (HM)/HAZARDOUS WASTE (HW) DISPOSAL

1. Compliance with hazardous waste management and disposal regulations requires the cooperative effort of many functions within the Camp Lejeune complex. The following outlines the responsibilities of various officers and managers relative to hazardous waste management:

a. Hazardous Material Disposal Officer (HMDO) will:

(1) Provide assistance to HW generators and handlers in the preparation and timely submittal of HW turn-in documents per this Order.

(2) Perform quarterly inspections of HW generation and storage sites and notify OIC's of corrective action required. Inspection format developed per paragraph 1b(2) below will be used.

(3) Keep OIC's and key personnel informed of any changes in regulations affecting HW activities within the HMDO's cognizance and ensure that HW standard operating procedures (SOP) are up-to-date and readily available for review by personnel involved in HW management.

(4) Develop a roster of personnel involved in HW management at each work site within the HMDO's cognizance.

(5) Develop and provide HW training requirements to HMDC for personnel within the HMDO's cognizance.

(6) Actively promote the reduction of volume and toxicity of HW produced by organizations within the HMDO's cognizance.

(7) Conduct surveys required to identify HW generation and storage sites within the HMDO's cognizance and provide periodic updates, as requested, to the HMDC.

b. Hazardous Material Disposal Coordinator (HMDC) will:

(1) Provide assistance to HMDO's in handling HW management problems. Serve as HMDO for organizations not having sufficient HW activity to justify appointment of a HMDO.

(2) Perform annual inspection of HW generation and storage sites and notify HMDO's of corrective action required. Inspection format will be developed in cooperation with the Director, Natural Resources and Environmental Affairs Division, (NREAD), Marine Corps Base.

(3) Inform HMDO's of any changes in regulations affecting HW activities under the HMDO's cognizance.

(4) Serve as point of contact on matters pertaining to HW management and implementation of this order within the HMDC's command.

(5) Develop listings of HW generation and storage facilities.

(6) Be responsible for identifying assistance required to provide HW training. Requests for assistance from MCB will be submitted in writing "Attention Director, NREAD."

c. Assistant Chief of Staff, Facilities will:

(1) Have overall responsibility for implementation of the subject program and maintaining compliance with requirements of references (a) and (b) and related local, state and federal regulations.

(2) Have overall responsibility for management of pollution abatement projects per latest revision of MCO P11000.8.

ENCLOSURE (2)

(3) Have overall responsibility for local implementation of Marine Corps programs to correct environmental discrepancies associated with past HM/HW disposal sites.

(4) Ensure that plans and specifications for new facilities provide adequate facilities and collateral equipment for the handling and storage of HM/HW.

d. Director, Natural Resources and Environmental Affairs Division will:

(1) Provide a staff specialist to serve as HMDC for Marine Corps Base.

(2) Provide a command point of contact with state and federal agencies on matters pertaining to the subject program.

(3) Monitor ongoing activities as required to identify, evaluate and provide up-channel reporting of environmental deficiencies related to the subject program.

(4) Coordinate day-to-day implementation of this Order and provide the following types of technical assistance:

(a) Laboratory support, if required, for HW identification.

(b) Training to HMDC's and HMDO's on state and federal environmental laws, regulations and procedures.

(c) Guidance on HM/HW SOP preparation.

(d) Guidance on HM/HW spill prevention, control, cleanup and related HW disposal.

(e) Coordination of HM/HW recycling/minimization program.

(5) Coordinate development and implementation of HW Training Program required for compliance with references (a) and (b).

e. Base Maintenance Officer will:

(1) Collect and dispose of used POL's and oily wastes from collection tanks and other oil pollution abatement facilities in a manner consistent with this Order and references (a) and (b).

(2) Unless otherwise provided, operate and maintain industrial waste collection, pretreatment and disposal facilities within the Camp Lejeune complex in a manner consistent with this order, references (a) and (b) and related State regulations.

(3) Provide HM/HW spill response services in accordance with reference (d).

f. Base Fire Chief will:

(1) Provide HM/HW spill and related emergency services per references (d) and (e) and related HW/HM Spill Contingency Plans.

(2) Provide routine inspections of facilities where HM/HW are stored and handled, and report all discrepancies to cognizant HMDC. Elimination of the following hazards will be stressed:

(a) HM/HW stored in defective containers or containers which are not properly marked with the chemical name, NSN (if appropriate) and hazard label of the contents.

(b) Incompatible HM/HW are stored in a manner with significant potential threat of fire, explosion, or release of toxic fumes or gases due to chemical reaction during spills or leaks.

(c) HM/HW stored in a manner likely to result in a significant discharge to the environment.

g. Assistant Chief of Staff, Logistics will:

(1) Appoint an officer to serve as HMDO for the Logistics Department.

(2) Ensure that suppliers provide hazardous material safety data sheets for all HM procured through open purchase and will provide one copy to unit ordering HM and one copy to the Base Safety Manager.

(3) Ensure local stocking and availability of the following on a reimbursable basis: empty containers; labels; labeling equipment; absorbents; frequently used minor equipment and HM/HW handling supplies required to implement this Order and reference (d).

(4) Provide contracting services required to dispose of HM or HW for which DRMO is not accountable.

(5) Serve as principal agent for the Commanding General on matters pertaining to HM and HW transportation, and will be responsible for:

(a) Monitoring all HW transportation for compliance with requirements of references (a), (b) and (c) and related state and federal regulations.

(b) Providing transportation services and related record keeping required for implementation of this Order and which are not available from the Defense Reutilization and Marketing Officer or the organization generating the HM/HW.

h. Assistant Chief of Staff, Manpower will:

(1) Coordinate for Marine Corps Base the development of a Hazardous Material Information System, per MCO 5100.25. Assist NREAD in providing safety data and related technical support to HMDC's, HMDO's and other cognizant officials as required to implement this Order.

(2) Provide HM related safety training required to implement HW training plans developed in accordance with paragraph 1d(5) of this enclosure.

i. Officer in Charge, Preservation, Packaging (PP&P) Section, 2dFSSG will provide PP&P support (in accordance with established regulations and procedures) to HMDO's, HMDC's, and other HW managers required to accomplish the following:

(1) Identification of type of containers and labeling required for compliance with reference (c) and this Order.

(2) Packaging of HM/HW required for safe storage and transportation during disposal per this Order.

(3) HM transportation certification required for compliance with reference (c).

j. Defense Reutilization and Marketing Officer (DRMO) will:

(1) Operate the base Long-Term Hazardous Waste Storage Facility at the TP-451 complex in accordance with state permit issued under regulations promulgated under references (a) and (b).

(2) Provide HM and HW disposal services to organizations within the Camp Lejeune/MCAS, New River complex in accordance with DOD regulations, references (a) and (b), and related state and federal regulations.

ENCLOSURE (2)

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(3) Receive and process HM/HW turn-in documents in a timely manner and provide prompt notification to HMDO's of any document not satisfying applicable turn in criteria or which contain HM/HW for which DRMO is not accountable.

(4) Maintain records of DRMO HM/HW storage and disposal activity in a manner which provides information required for preparation and timely submittal of required reports to state and federal regulatory agencies.

(5) Keeps HMDC's, HMDO's and other cognizant officers informed of changes in DRMO policies and procedures which affect local implementation of the subject program.

k. Commanding Officers of the following Base Commands/Organizations will designate a Primary and Alternate HMDO to carry out duties outlined in 1a and 1b above: Marine Corps Engineer School; Rifle Range Detachment; Field Medical Service Support School; Marine Corps Service Support School; Reserve Support Unit; Infantry Training School; Support Battalion; Headquarters Battalion; Assistant Chief of Staff, Morale, Welfare and Recreation; Assistant Chief of Staff, Logistics, and Base Maintenance Officer within their respective commands/organizations.

ENCLOSURE (2)

HAZARDOUS WASTE TRAINING REQUIREMENTS AND GUIDELINES

1. Hazardous waste (HW) training is a specific requirement of state and federal regulations promulgated under the Resource Conservation and Recovery Act (RCRA). A review of RCRA requirements and the actual HW activity aboard the Camp Lejeune/Marine Corps Air Station, New River complex indicates that a relatively small percentage of personnel require highly specialized HW training. Generally, the requirements for the remaining personnel involved in HW management are satisfied by routine on-the-job training and related safety and fire-prevention training readily available locally. Providing this training will have minor impact on organizational commanders, in that training required is directly job related. Appendix (A) Part II identifies the minimum HW training required, for personnel identified in Section 2d below.

2. Initial and annual refresher HW training is required for all personnel in this Section. For the purpose of these guidelines, only those personnel directly involved in HW handling, storage and disposal will be subject to the HW training documentation requirements of RCRA. A special HW training record, i.e., Appendix (A) Part I will be developed for the following personnel:

- a. All Hazardous Material Disposal Officers (HMDO), Hazardous Material Disposal Coordinators (HMDC), and alternate HMDO's and HMDC's.
- b. Defense Reutilization and Marketing Officer (DRMO) and subordinate personnel routinely involved in HW handling, storage, turn-in and disposal.
- c. Activity personnel involved in transportation of HW required for the implementation of this Order.
- d. Personnel assigned to work places meeting the definition of HW generators, HW accumulation areas or satellite HW accumulation areas and involved in one or more of the following:

- (1) Collection, handling, storage and transportation of HW.
- (2) Inspection, and related follow-up, of HW handling/storage areas.
- (3) Response to HW spills and related emergencies.
- (4) Preparation and submittal of HW turn-in documents.

3. Other activity personnel providing professional and technical support to HW management include the following:

- a. Fire Protection personnel
- b. Safety specialists
- c. Environmental staff
- d. Industrial hygienists

Preparation of Appendix A for these staff specialists and emergency personnel is not required. Duties and training provided to these individuals will consist of standard position descriptions and civilian personnel records.

4. Responsibility for providing specialized HW training required for compliance with RCRA is assigned to Assistant Chief of Staff, Facilities. The following officials are responsible for notifying Assistant Chief of Staff, Facilities of specialized training requirements of their subordinates and other personnel as shown.

- a. The DRMO for self and subordinates
- b. The Assistant Chief of Staff, Logistics for subordinates.

ENCLOSURE (3)

c. HMDC's for personnel shown in 2d above within HMDC's cognizance

d. Director, Natural Resources and Environmental Affairs Division (NREAD) for subordinates and primary and alternate HMDC's and HMDO's.

5. Organizational commanders are responsible for developing and implementing plans and procedures to provide RCRA required training and maintain records outlined in Appendix A. Organizational commanders will ensure that all new/newly assigned personnel are provided appropriate HW training and close supervision required to comply with RCRA and applicable personnel safety fire prevention and occupational health standards. Organizational commanders will notify HMDC's of HW training requirements. Notification will include names and addresses of persons to be trained and an accurate description of the training required. HMDC and Assistant Chief of Staff, Facilities representative will coordinate the scheduling and funding of specialized HW training.

6. Records of HW training must be maintained for each employee for three years after employee transferred or terminated, except as follows: if an employee is transferred to a HW related position within the Camp Lejeune/Marine Corps Air Station, New River complex, the HW training records will be transferred to the new organization. Responsibility for maintaining official files of HW training records are as follows:

a. HMDC's will maintain records of HW training for HMDC's, HMDO's and alternate HMDC's and HMDO's within their cognizance.

b. DRMO will maintain HW training records for all employees identified in paragraph 2b above.

c. Assistant Chief of Staff, Logistics will maintain HW training records for all subordinates involved in activities identified in paragraph 2c above.

d. HW training records for all employees identified in paragraphs 2(a) - 2(d) will be maintained on Appendix A, Part I. HMDO will maintain HW training records for personnel identified in paragraph 2(d) above. A copy of training records for personnel identified in paragraph 2(d) above will be maintained in HWMSOP.



