

## FILE FOLDER

### DESCRIPTION ON TAB:

Combat Eng. Bn.

2d mar Div

**Outside/inside of actual folder did not contain hand written information**

**Outside/inside of actual folder did contain hand written information**

**\*Scanned as next image**

IF FOUND PLEASE RETURN TO NREAD  
BLDG 1103 CAMP LEJEUNE, NC  
PHONE 2083/2195

Poc's

LT. WATTAY - HMDO

LCPL OLIVER - MOTOR TRANSPORT [5223]

PFC WILLINGHAM - BATTERY NCO, COMM PIT.

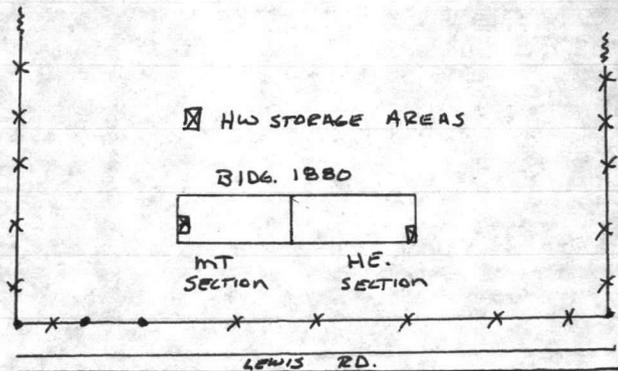
SSGT SILER - HEAVY EQUIPMENT [3975, 3426]

BATT. STORAGE AREA

BIDG 442

Bldg 434

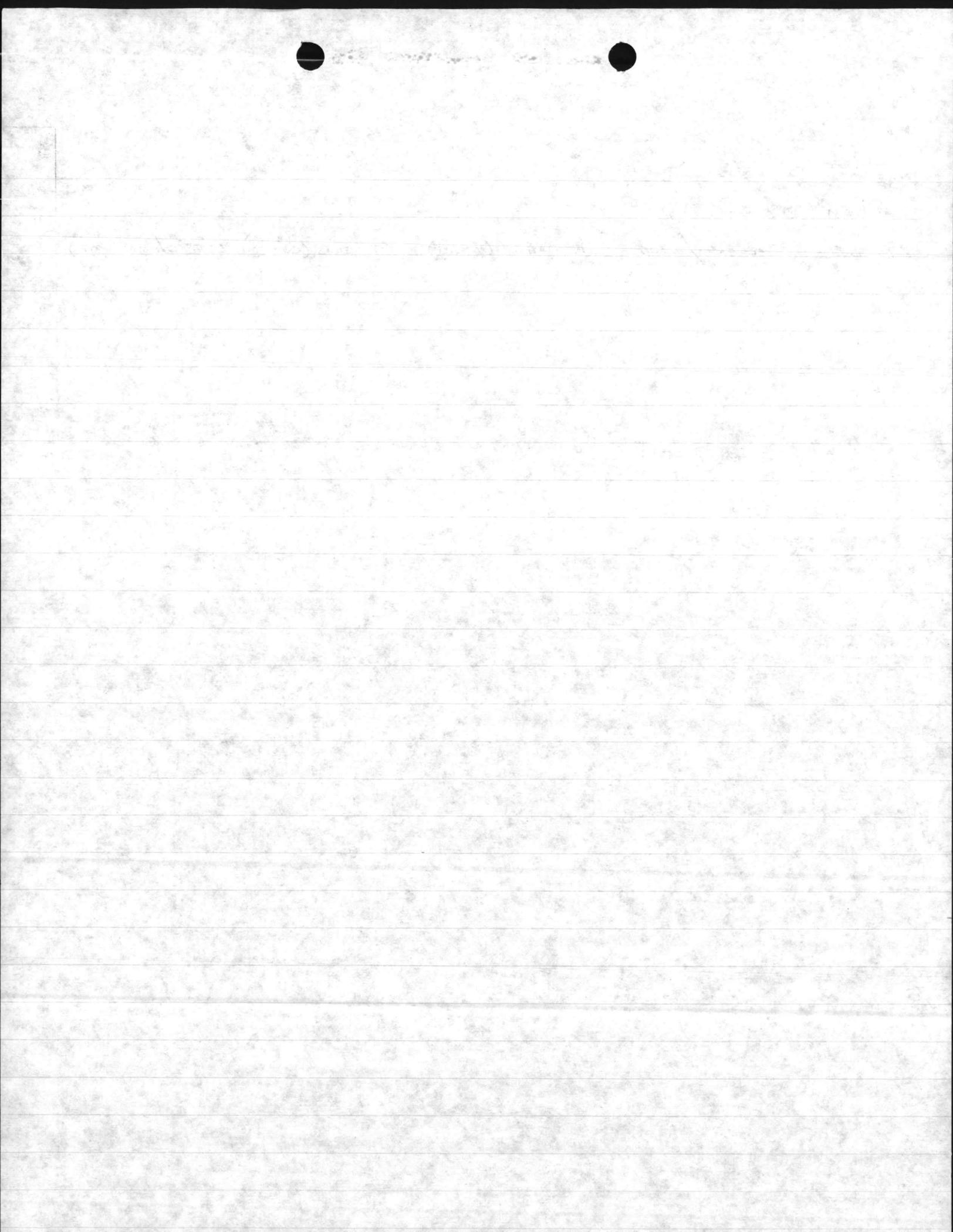
Comm. PIT.





LAST INSPECTION

27 FEB 86 BELKER / KAUP LT. WATAY (HMDO) GY LEWIS (COMM) LCPL OLIVER (MT)



NREAD

6240  
NREAD

MAR 30 1987

**From:** Commanding General, Marine Corps Base, Camp Lejeune  
**To:** Commanding General, 2d Marine Division, Camp Lejeune, NC  
**Subj:** HAZARDOUS WASTE MANAGEMENT COMPLIANCE INSPECTION ON COMBAT ENGINEERS BATTALION DTD 2 DEC 1986; FOLLOW UP ON

**Ref:** (a) CG MCB ltr dtd 7 Jan 87  
(b) CG MCB 291625 Oct 86  
(c) BO 6240.5A

**Encl:** (1) Hazardous Waste Management Compliance Re-inspection Report for 2d Combat Engineers Bn; 2d Marine Division of 10 Mar 87

1. On 10 March 1987, a re-inspection was conducted by Base Environmental personnel to determine the adequacy of action taken to correct discrepancies identified during the subject inspection and documented in reference (a). The subject inspection was conducted in accordance with reference (b) to determine compliance with hazardous waste regulations described in reference (c). The enclosure provides findings during the re-inspection.

2. Based on the enclosure and observations during the re-inspection, the following general comments are provided:

a. The level of compliance with hazardous waste regulations appears to have deteriorated since the subject inspection, and

b. In order to increase awareness to regulatory requirements, all personnel with significant hazardous waste management responsibility should be provided formal classroom training. Base Environmental personnel are available upon written request to conduct the recommended training. Addressee should arrange for training site. Classes should last approximately two hours.

4. Point of contact for this matter is Mr. Danny Sharpe, extensions 2083/1690.



T. J. DALZELL  
By direction



[Faint, illegible text visible through the paper, likely bleed-through from the reverse side.]

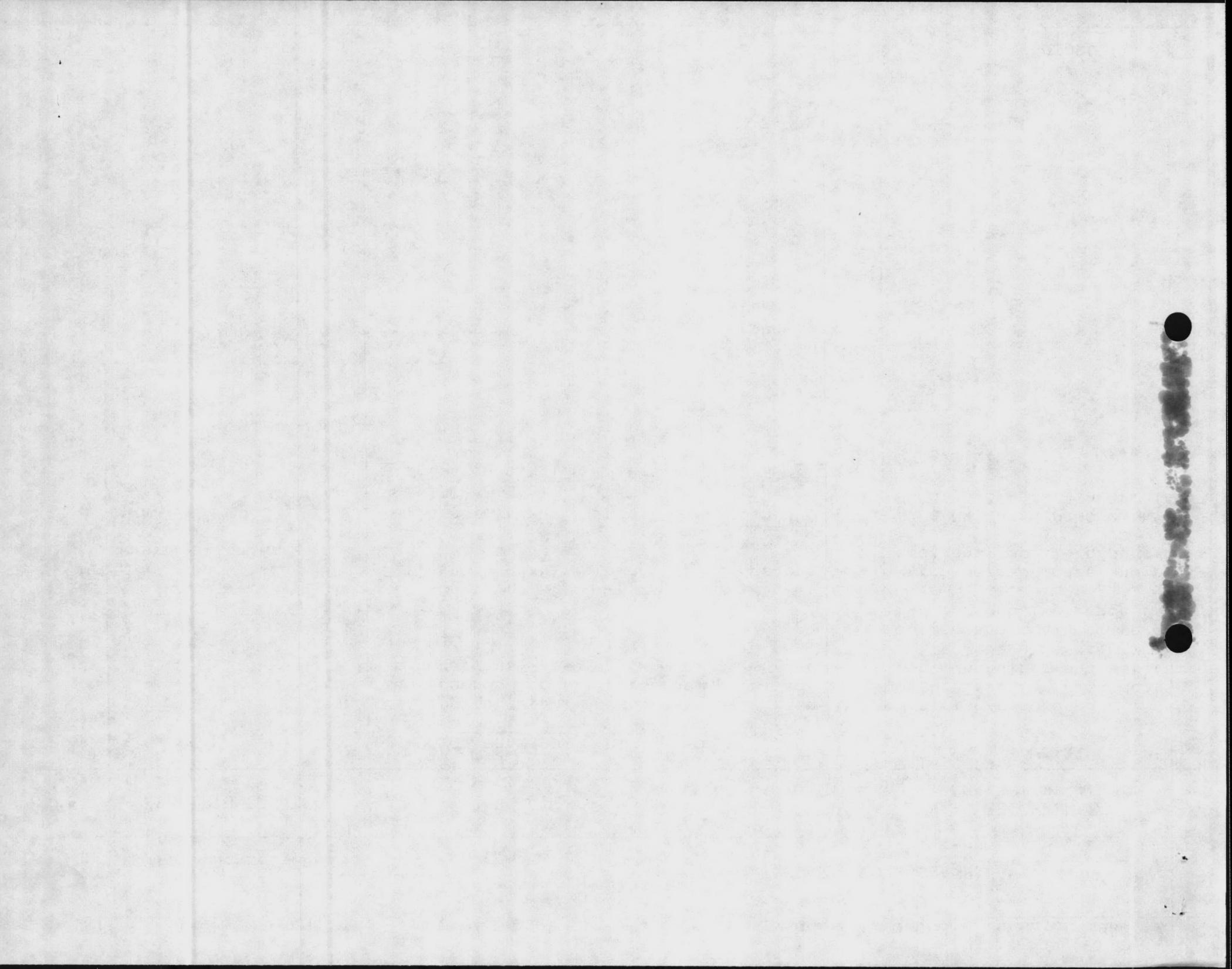
ORGANIZATION:

2D Marine Division  
2D Combat Engineer Bn

INSPECTION DATE: 10 March 1987

INSPECTOR'S NAME Sammy Gwynn

NO.	SPECIFIC LOCATION	DISCREPANCY	REF	RECOMMENDED CORRECTIVE ACTION
1		<u>MOTOR TRANSPORT PLT</u>		
	a. Bldg 1880	Failure to establish and maintain training records for all personnel involved in hazardous waste	1	Training records shall be maintained for hazardous waste handlers and alternate to include a description of duties and training received for personnel at each site.
	b. Bldg 1880 Outside HW Accumulation Area	Failure to post emergency spill response information.	2	Purchase/fabricate and post emergency spill response signs
	c. Bldg 1880	Failure to turn HW into DRMO within 90 day time limit. Start Accumulation 24 Nov 86	3	Turn HW in to DRMO within 90 days of start accumulation



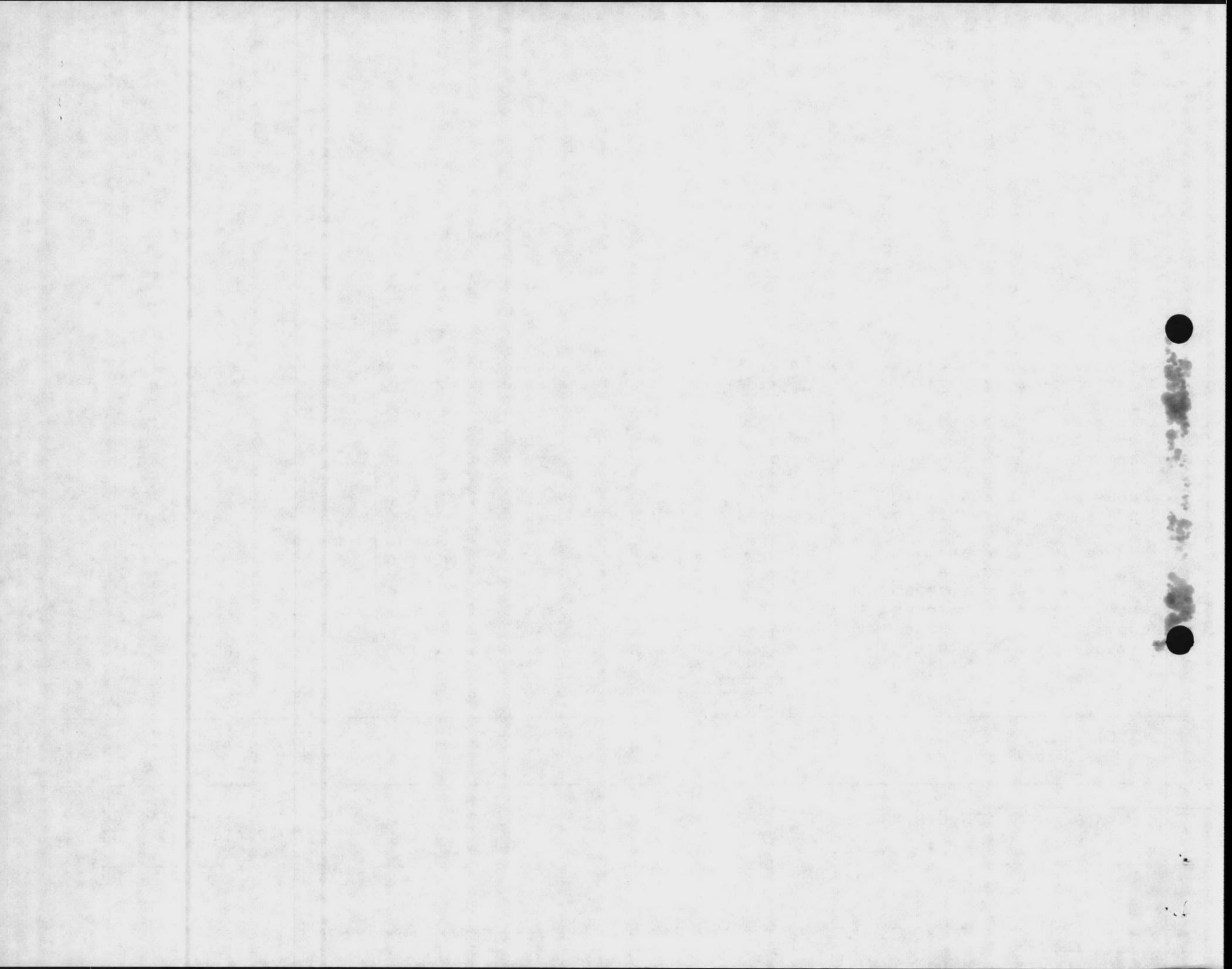
## HAZARDOUS WASTE MANAGEMENT COMPLIANCE INSPECTION REPORT

ORGANIZATION:

2D Marine Division  
2D Combat Engineer Bn

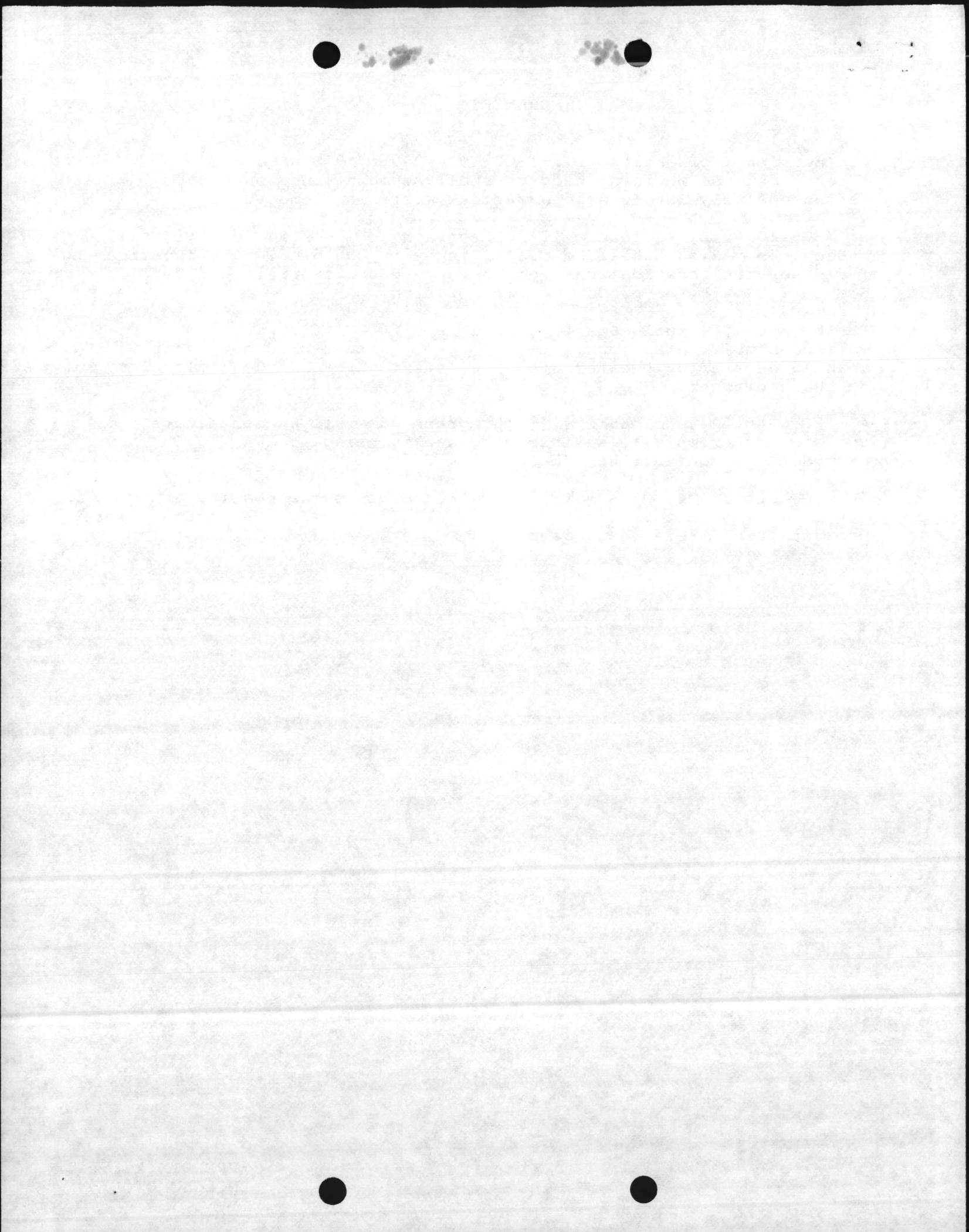
INSPECTION DATE: 10 March 1987INSPECTOR'S NAME Sammy Gwynn

NO.	SPECIFIC LOCATION	DISCREPANCY	REF	RECOMMENDED CORRECTIVE ACTION
2		<u>HEAVY EQUIPMENT SECTION</u>		
.a	Bldg 1880	Failure to establish and maintain training records for all personnel involved in hazardous waste	1	Training records shall be maintained for hazardous waste handlers and alternate to include a description of duties and training received for personnel at each site.
b	Bldg 1880	Failure to post emergency spill response information	2	Purchase fabricate and post emergency spill response signs
c	Bldg 1880	Failure to conduct weekly inspections and maintain a log of hazardous waste sites	4	Conduct weekly inspection and maintain an inspection log on all hazardous waste sites.
d	Bldg 1880	Failure to post hazardous waste spill contingency plan	5	Post spill contingency plan at all hazardous waste sites.



## REFERENCES

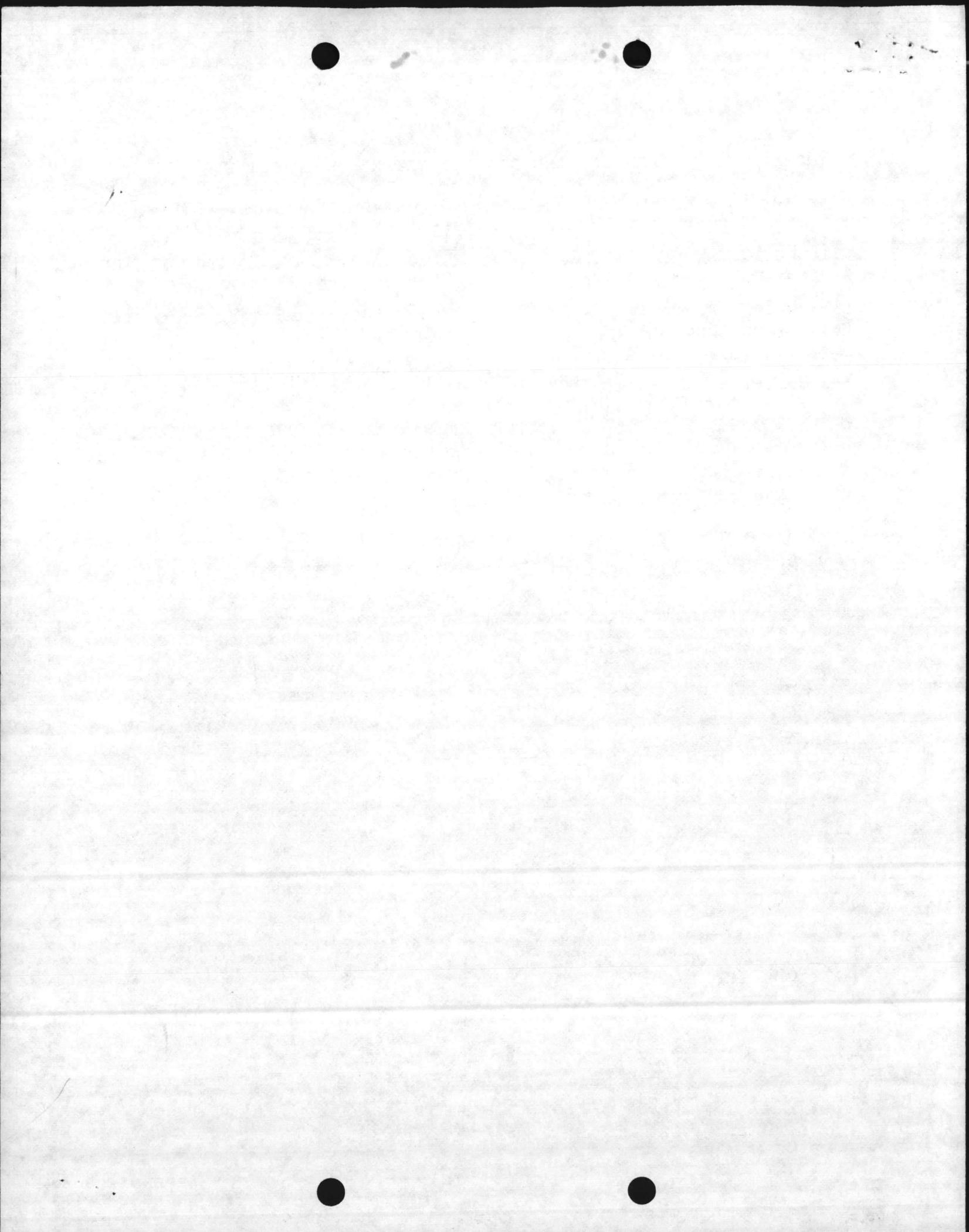
1. Section 1 of enclosure (1) CG ltr 6240 of 9 Sep 85  
"Clear, concise training records shall be maintained on each person actively involved in hazardous waste management."
2. BO 11090.1B, enclosure (2), paragraph 1c - posting of oil spill procedures. Signs shall be posted in every building, tank location and field service location where oil or hazardous materials are used. See BO 11090.1B for proper wording of sign.
3. BO 6240.5A, enclosure (1), paragraph 2f - 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.
4. BO 6240.5A, enclosure (1), paragraph 2d - All HW containers and storage areas will be inspected weekly using format provided by cognizant HMDC/HMDO.
5. CG letter 6240 NREAD of 10 Nov 86, requires the posting and development of sites specific hazardous waste spill responsibilities prevention and related guidance.



2d MARINE DIVISION

AUTHORIZED HW GENERATION AND STORAGE SITES FOR 2D CBT ENG BN

Site No. 1 Generation/Accumulation	Bldg 1880, Heavy Equipment, Battery Room, Electrolyte
Site No. 2 Generation/Accumulation	Bldg 1880, Heavy Equipment, Inside Storage Tank, Solvent and Waste Oil
Site No. 3 Generation/Accumulation	Bldg 1880, Motor Transport Plt Solvent
Site No. 4 Accumulation	Outside accumulation Area Solvents



HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 10 MAR 87

1. Facility being Inspected: 2d CFB Motor Transport plt Bldg 1880
2. Organization in Charge: 2d MAR ON
3. Inspection Participants/Phone Number: Lt Sgt Allen (prim)  
Sgt Deal (alt) phone 3583
4. Description of HW Streams: Dry Cleaning Solvent,

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

6. HW Training

a. Are job descriptions available for all personnel actively involved in HW management?     

b. Are training records adequate/current?     

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

d. Do contacted personnel demonstrate<sup>1</sup> adequate knowledge of:

- (1) Regulatory Requirements
- (2) Applicable Base Orders
- (3) Types of HW Handled
- (4) Proper Containers
- (5) Proper Labeling
- (6) Weekly HW Inspections
- (7) HW Turn-in Procedures
- (8) Health and Safety
- (9) Spill Reporting Procedures
- (10) Spill Response Duties

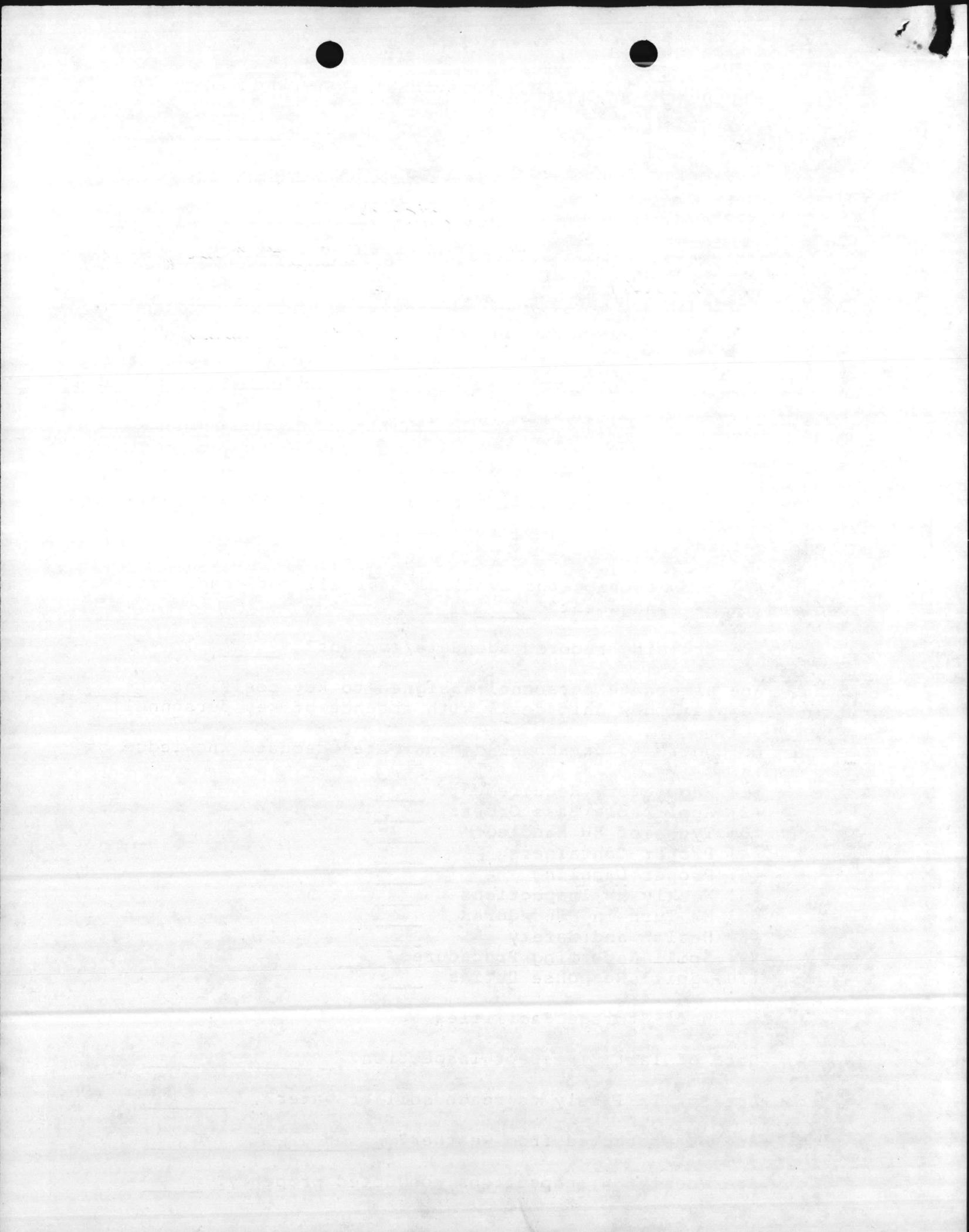
7. Condition of Storage Facilities

a. Date of last Fire Dept Inspection?     

b. Are spills likely to reach soil or water?     

c. Are HW protected from weather?     

d. Are weekly HW inspections conducted properly?



e. Are discrepancies corrected promptly? \_\_\_\_\_

f. Condition of containers? ("X" indicates discrepancy)

- |                      |                                      |
|----------------------|--------------------------------------|
| (1) Closed _____     | (7) Properly Labeled _____           |
| (2) Leaking _____    | (8) Properly Dated _____             |
| (3) Bulging _____    | (9) Properly Stacked _____           |
| (4) Collapsed _____  | (10) Properly Packaged _____         |
| (5) Corroded _____   | (11) Meet DOT Requirements for _____ |
| (6) Overfilled _____ | Contents _____                       |

g. Are 90 day turn-in deadlines being met? \_\_\_\_\_

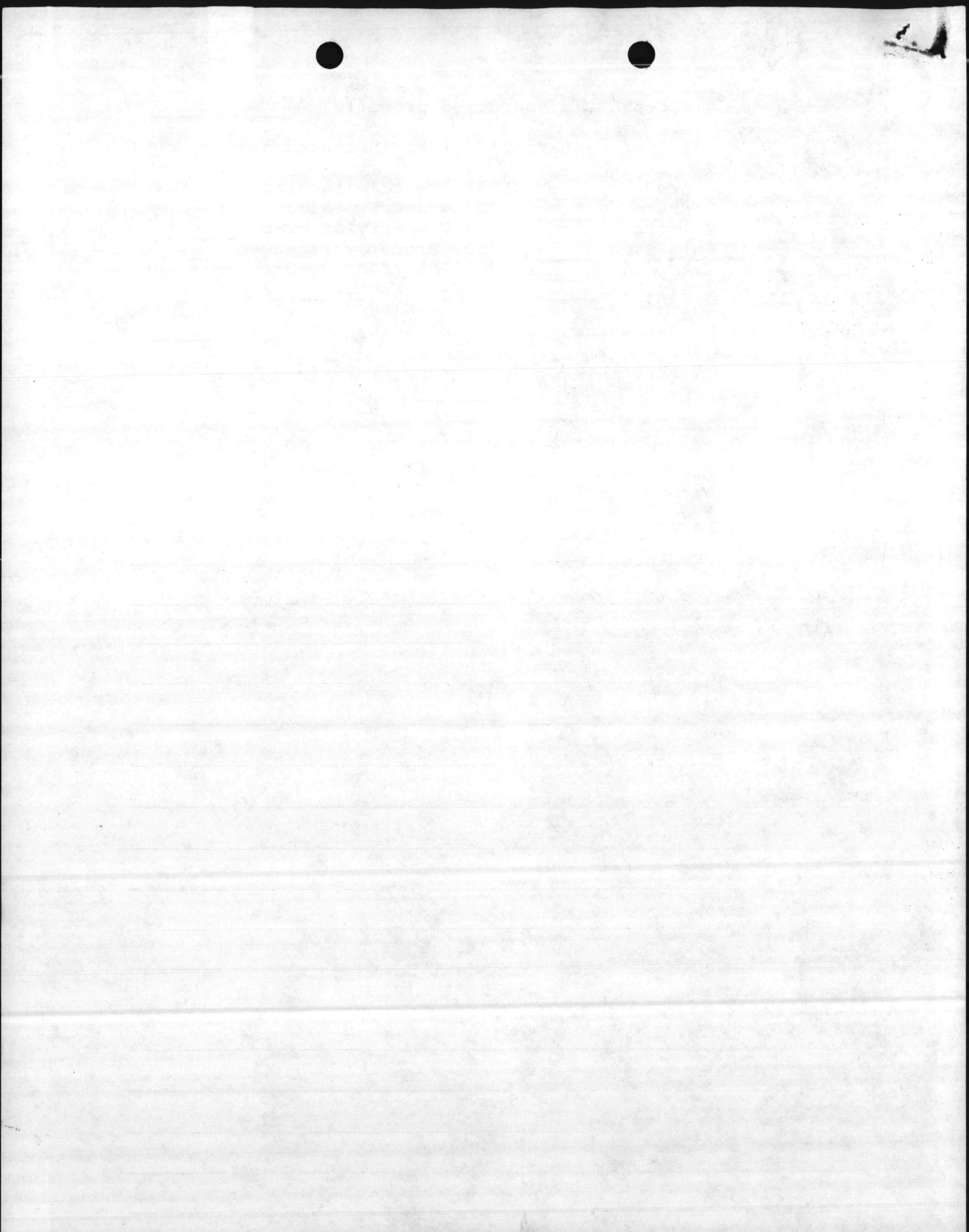
h. Are HW turn-in documents being prepared and submitted in a timely, proper manner? \_\_\_\_\_

i. Comments: \_\_\_\_\_

*Training records were not at sight*

*BOI/HW sign not at sight of HW Area*

*One Tank of Dry Cleaning Solvent has not been picked up  
Date 24 NOV 80*



HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 10 MAR 87

1. Facility being Inspected: Bldg 1880 2d CEB Heavy Equip Section
2. Organization in Charge: 2d MAR DIV
3. Inspection Participants/Phone Number: Sgt Small (primary)  
Sgt Tanker (alternate) phone 3975
4. Description of HW Streams: Solvents + Electrolyte  
Dry Cleaning Solvents

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

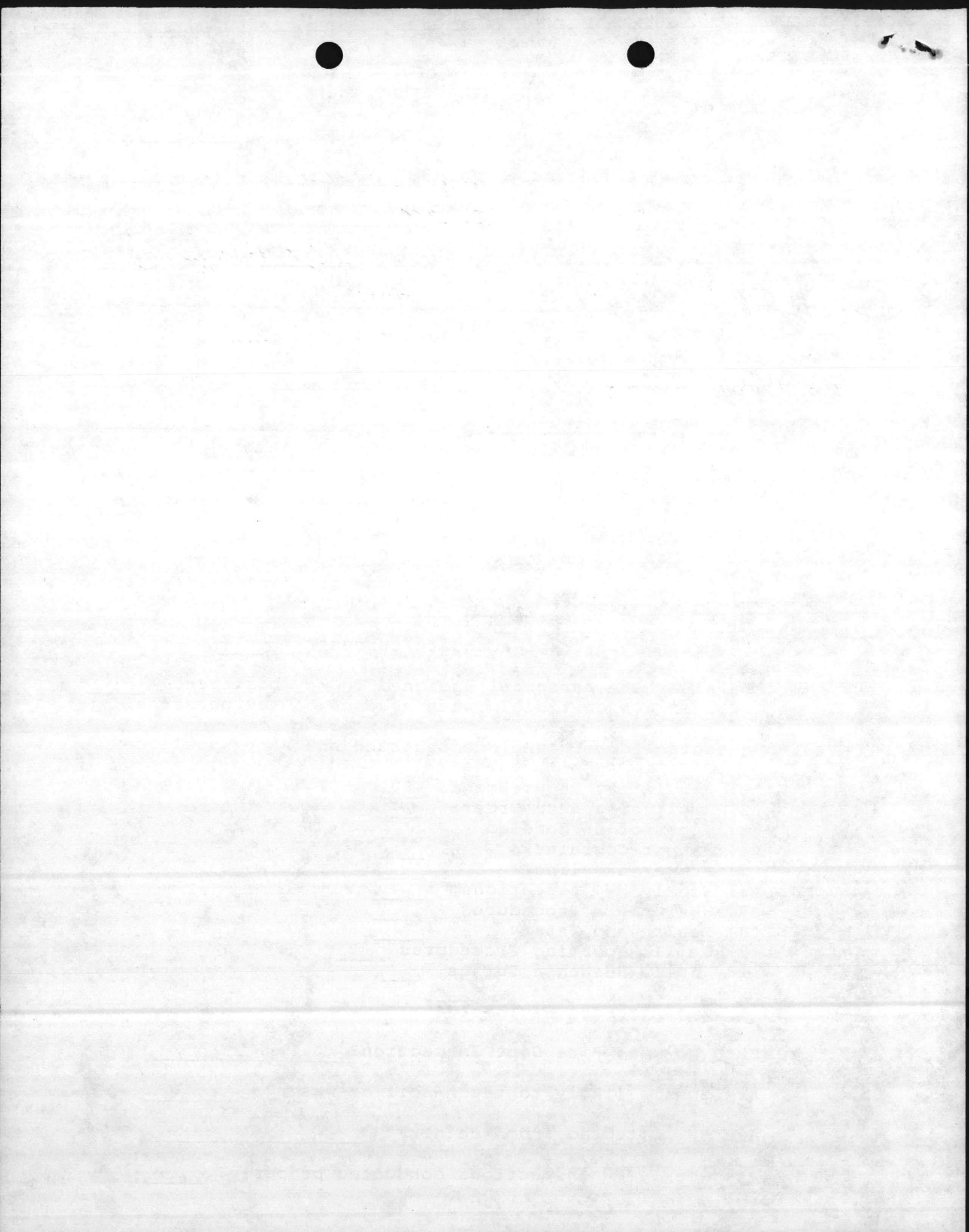
6. HW Training

- a. Are job descriptions available for all personnel actively involved in HW management? Partially
- b. Are training records adequate/current? NO
- c. Are alternate personnel assigned to key positions? NO  
(If not, explain how unit deals with absence of key personnel)
- d. Do contacted personnel demonstrate adequate knowledge of:

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

7. Condition of Storage Facilities

- a. Date of last Fire Dept Inspection?
- b. Are spills likely to reach soil or water? Yes
- c. Are HW protected from weather? NO
- d. Are weekly HW inspections conducted properly? NO



e. Are discrepancies corrected promptly? 9

f. Condition of containers? ("X" indicates discrepancy)

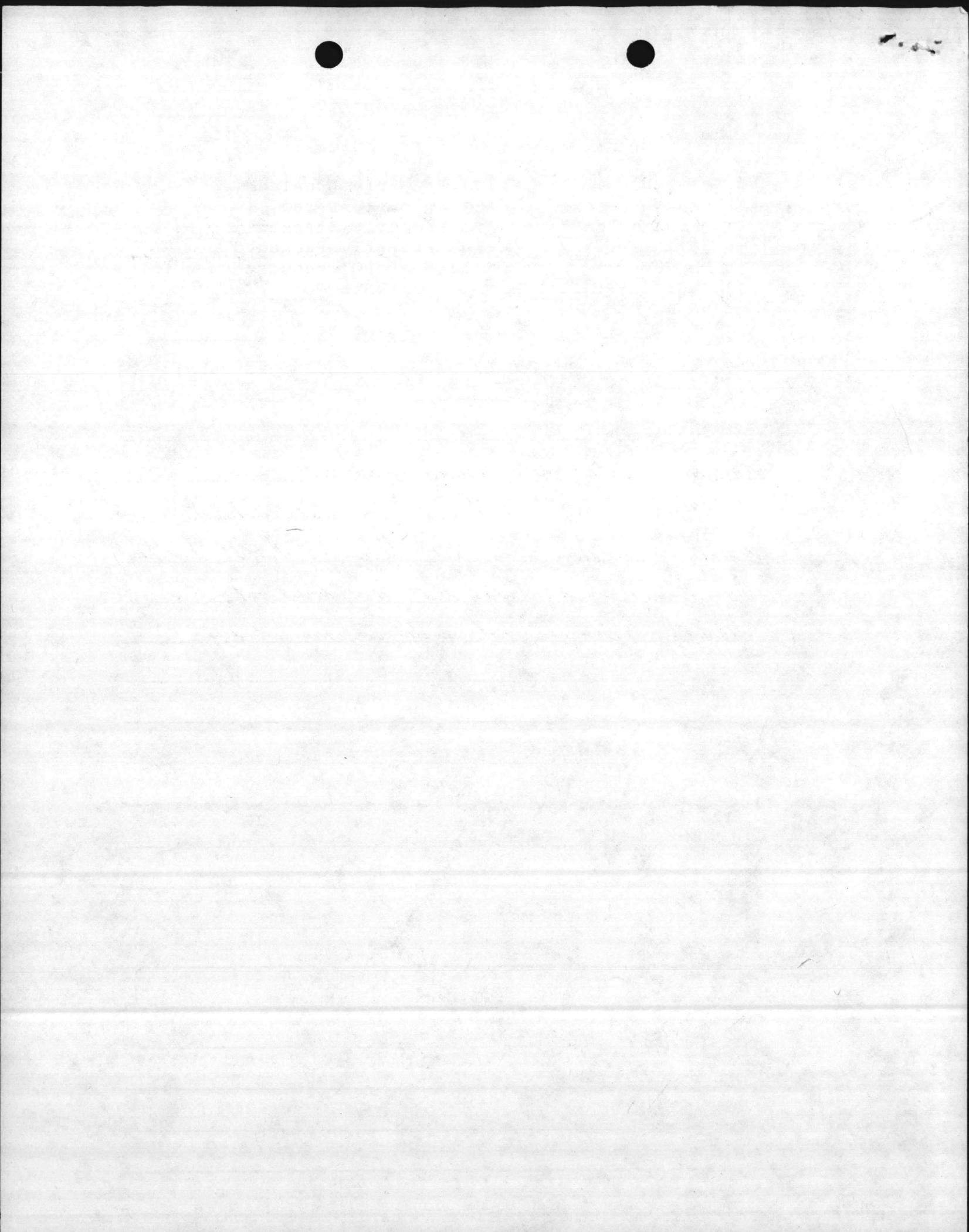
- |                |       |                                |       |
|----------------|-------|--------------------------------|-------|
| (1) Closed     | _____ | (7) Properly Labeled           | _____ |
| (2) Leaking    | _____ | (8) Properly Dated             | _____ |
| (3) Bulging    | _____ | (9) Properly Stacked           | _____ |
| (4) Collapsed  | _____ | (10) Properly Packaged         | _____ |
| (5) Corroded   | _____ | (11) Meet DOT Requirements for | _____ |
| (6) Overfilled | _____ | Contents                       | _____ |

g. Are 90 day turn-in deadlines being met? \_\_\_\_\_

h. Are HW turn-in documents being prepared and submitted in a timely, proper manner? \_\_\_\_\_

i. Comments: \_\_\_\_\_

*Training records on primary were not complete*  
*" " " Alternate were not implemented*  
*Weekly inspections were not being conducted (3 on hand)*  
*Contingency of law was not posted by rot*  
*HW/PSL signs were not posted in immediate area*



ORGANIZATION:

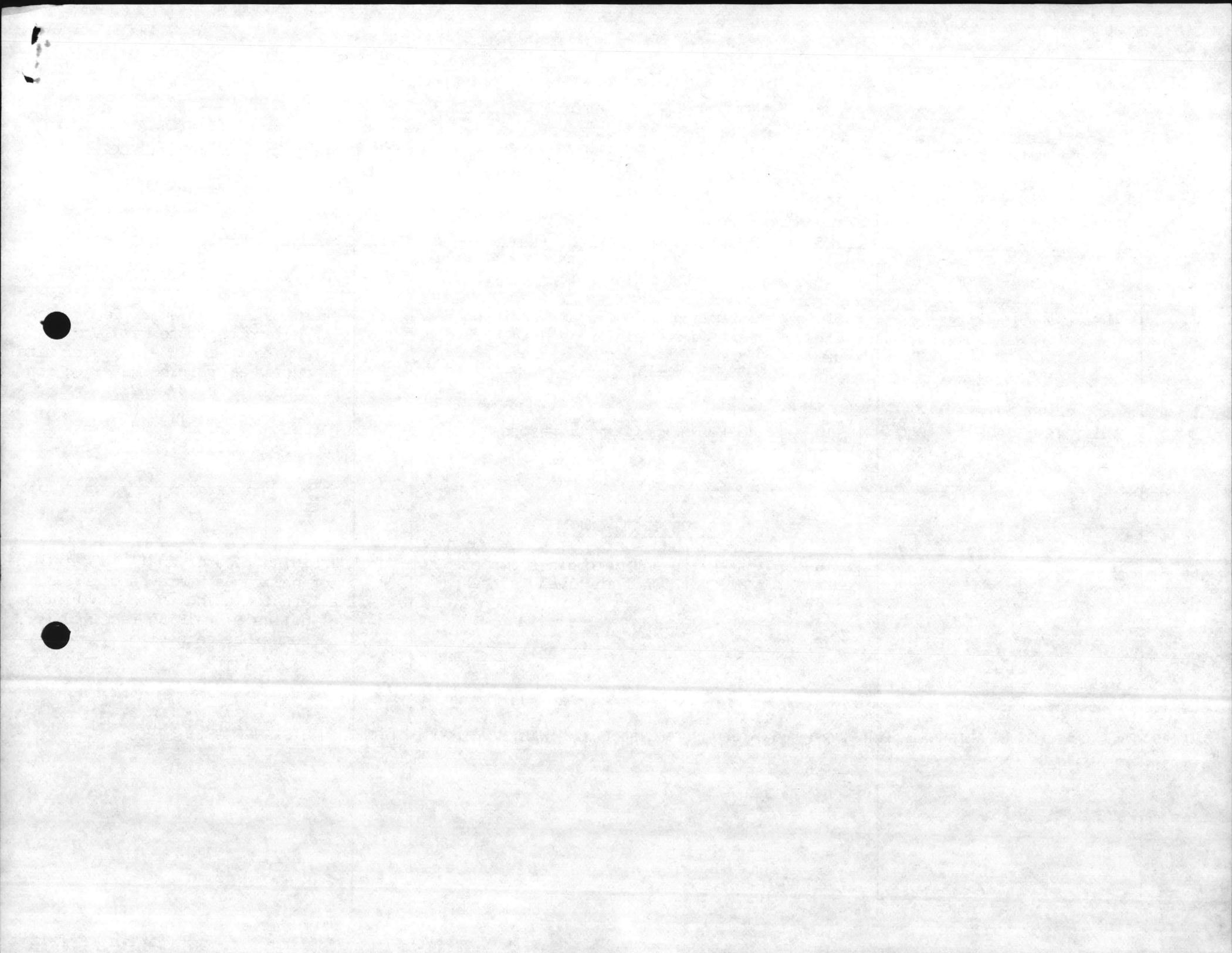
2d MARDIV  
2d CBT ENG

INSPECTION DATE: 2 December 1986

INSPECTOR'S NAME: Danny Becker

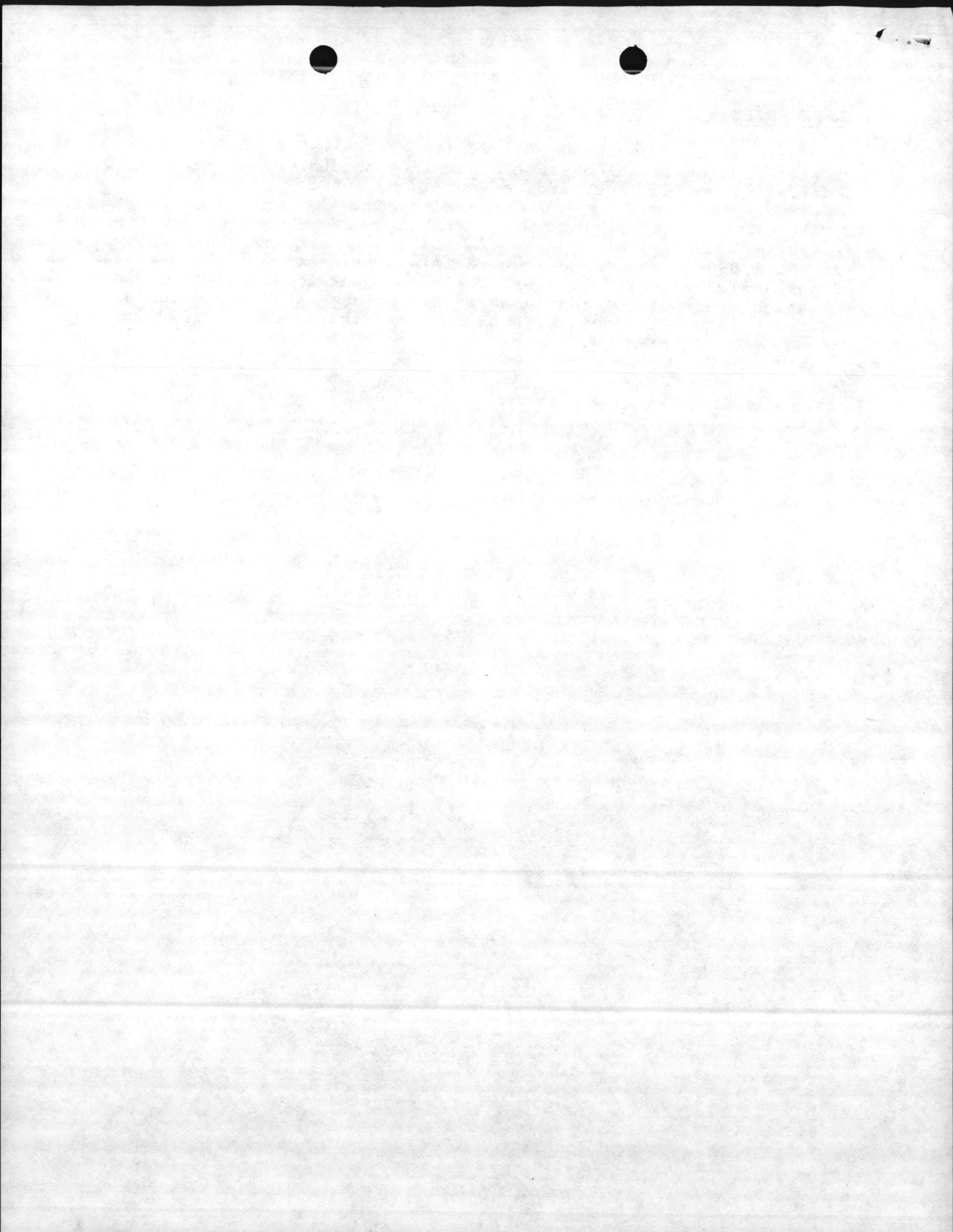
NO.	SPECIFIC LOCATION	DISCREPANCY	REF	RECOMMENDED CORRECTIVE ACTION
1.		<u>HEAVY EQUIPMENT PLT</u>		
a.	Bldg. #1803	Failure to establish and maintain training records for all personnel involved in hazardous waste.	1	Training records shall be maintained for hazardous waste handlers alternate to include a description of duties & training received for personnel at each site.
b.	Bldg. #1803	Failure to post emergency spill response information.	2	Purchase/fabricate and post emergency spill response signs.
2.		<u>MOTOR TRANSPORT</u>		
a.	Bldg. #1803	Failure to establish and maintain training records for all personnel involved in hazardous waste.	1	Training records shall be maintained for hazardous waste handlers & alternate to include a description of duties & training received for personnel at each site.

COMMENTS: APPOINT AN ALTERNATE FOR GYSGT ALLEN TO ASSUME HAZARDOUS WASTE RESPONSIBILITIES IN HIS ABSENCE.



REFERENCES:

1. Section 1 of enclosure (1) CG ltr 6240 NREAD of '9 Sep 85  
"Clear concise training records shall be maintained on each person actively involved in Hazardous Waste Management."
2. BO 11090.1B enclosure 2, para 1c - posting of Oil Spill Procedures Signs shall be posted in every building, tank location and field service location where oil or hazardous materials are used. The sign shall have a yellow background with black lettering. See BO 11090.1B for proper wording of sign.



2d MARDIV

AUTHORIZED HW GENERATION- AND STORAGE SITES FOR 2d CBT ENG

SITE NO. 1  
GENERATION/ACCUMULATION

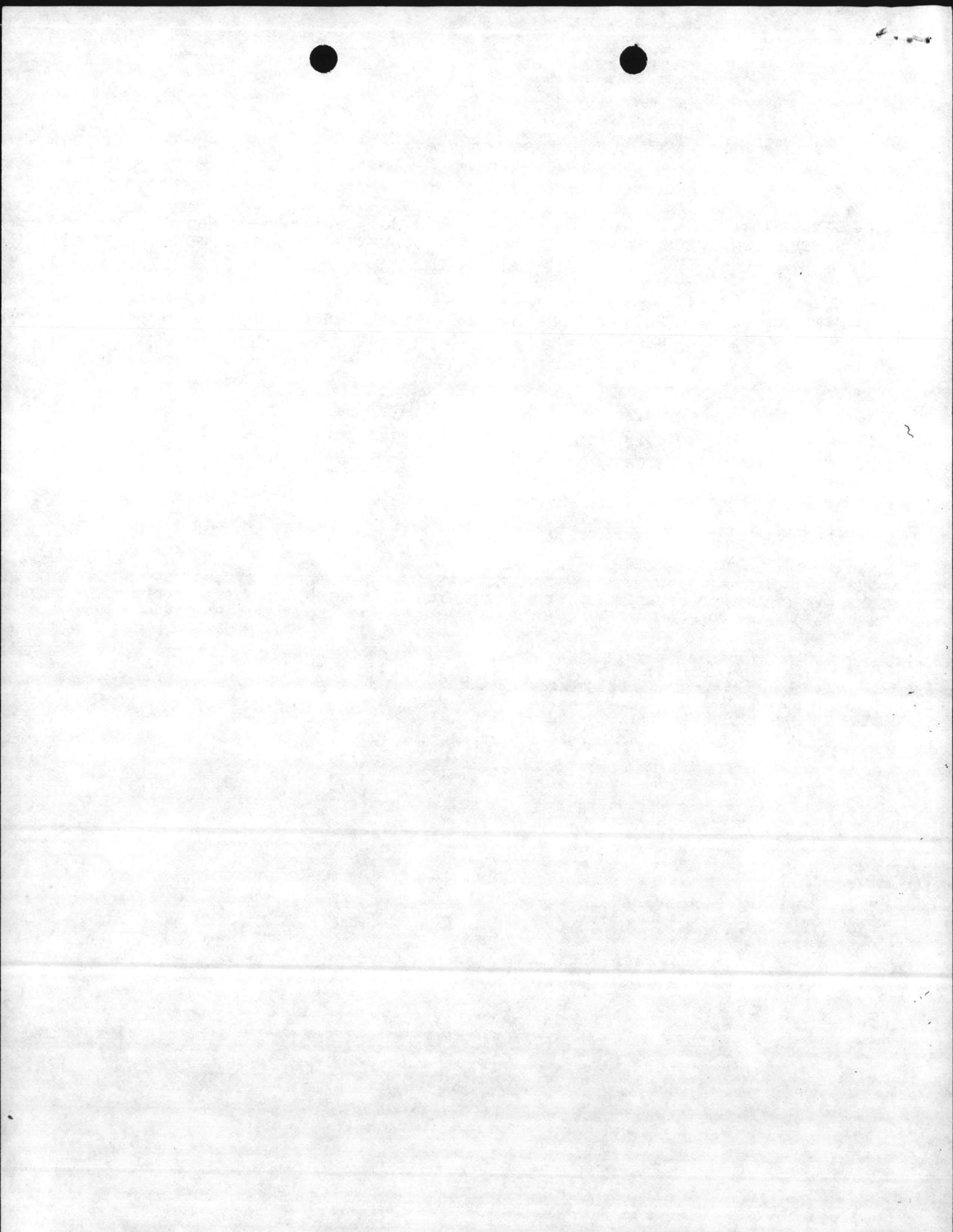
Bldg. 1803, Heavy Equip., Battery RM  
SOLVENTS, ELECTROLYTE & WASTE OIL

SITE NO. 2  
GENERATION/ACCUMULATION

Bldg. 1803, Heavy Equip., Inside  
Storage Tank  
SOLVENT

SITE NO. 3  
GENERATION/ACCUMULATION

Bldg. 1803, Motor Transport  
SOLVENT



CAPT VOGEL 5-4 off.

2d MAR DIV

3993 #417

Lt. SJELIN 3704/3999  
H. D. D. Bn.

2<sup>nd</sup> CEB  
HE plt.  
Supp Co.

Lt. Heeschea 3975

LCPL close Batt room

need tung records 1808 Bldg

MT sec.

GYSGT Allen 3583

need tung records

Post Spied sign  
at gen. sites

~~call~~  
~~George about~~  
~~Barber at~~  
~~see 401~~



HAZARDOUS WASTE MANAGEMENT INSPECTION

1. Organization Inspected: COMBAT ENGINEER Bn. 27 FEB 84

2. Name and title of persons conducting inspection:

a. NREAD Representative: DANNY BECKER

b. Organizational Commander Representative: 1ST LT WATTAY (HMDO)

c. Other (Specify) : SGT LEWIS (COMM) MSGT KAUP (HMDC)

LCPL OLIVER (5223) MOTOR TRANSPORT

3. Brief Description of HW Activity: GENERATE WASTE MINERAL SPIRITS FROM

DEGREASING OPERATIONS AT THE MOTOR TRANSPORT + HEAVY EQUIPMENT

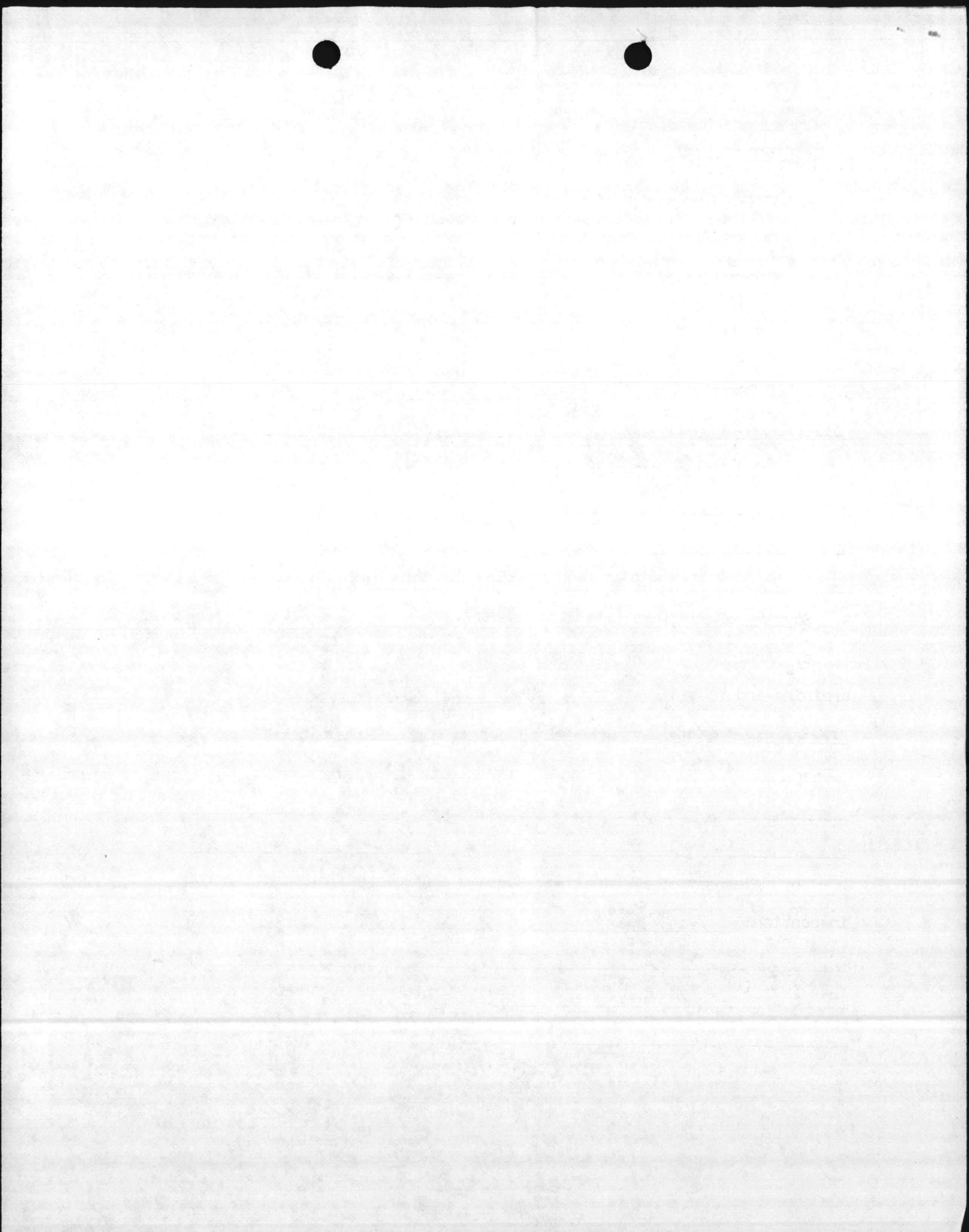
SECTIONS. GENERATE WASTE LITHIUM BATTERIES AT COMM. PIT.

4. Summary of Findings (See Attachment A- 3 )

a. Assignment of HW management responsibilities and related personnel training and record keeping: VERY GOOD. HMDO HAS BEEN APPOINTED +

THERE ARE CLEAR CUT POINTS OF CONTACTS. TRNG + RECORD KEEPING IS BEING  
DONE

b. Adequacy of HW handling, storage and related internal controls and inspection: VERY GOOD



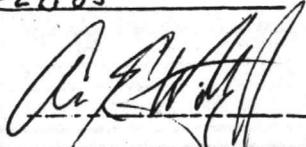
INSPECTION FOR HAZARDOUS WASTE HANDLING AND STORAGE AREAS

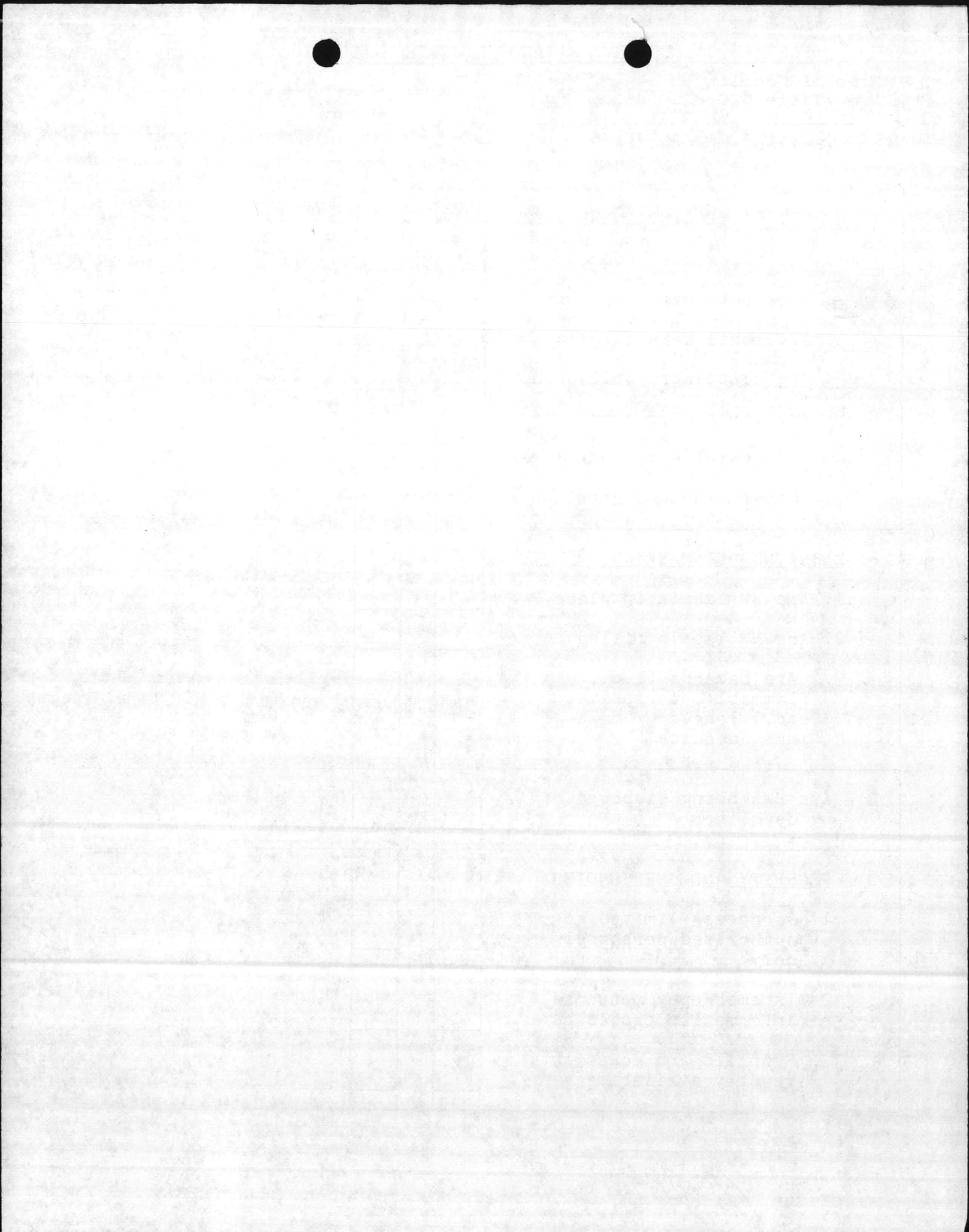
Name of Facility: Comm PIT. CEB

Name/Title OIC: LT. FIRNBERG (BATT. NCO - PFC WILLIAMS)

AREA OF CONCERN	YES	NO	CORRECTIVE ACTION NEEDED (use back of page to list action taken)				
<p><u>A. CONDITION OF CONTAINERS</u></p> <p>1. Are containers closed</p> <p>2. Are containers leaking</p> <p>3. Are containers bulging</p> <p>4. Are containers collapsed</p> <p>5. Are containers corroded</p> <p>6. Are containers over-filled</p> <p>7. Other problems present</p>	/		<p>#1 NO WASTE BATT. @ THIS TIME HAVE JUST BEEN SHIPPED</p>				
<p><u>B. LABELING AND MARKING</u></p> <p>1. Are HW labels in place</p> <p>2. Are HW labels filled out</p> <p>3. Are hazards (i.e., flammable, corrosive, etc.) labels or markings adequate</p>			/		<p>SEE #1 ABOVE</p>		
<p><u>C. Are HWs being disposed of by deadlines</u></p>					/		
<p><u>D. SECURITY AND EMERGENCIES</u></p> <p>1. Is access limited to authorized personnel only</p> <p>2. Is emergency response information posted</p> <p>3. Supplies and equipment readily available</p>					/		

DATE: 27 FEB 85

SIGNATURE: 



INSPECTION FOR HAZARDOUS WASTE HANDLING AND STORAGE AREAS

Name of Facility: MOTOR TRANSPORT

Name/Title OIC: W O NELSON

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

DATE: 27 FEB 86

SIGNATURE: \_\_\_\_\_

