

FILE FOLDER

DESCRIPTION ON TAB:

2d Logspt BN

2d FSSG

- Outside/inside of actual folder did not contain hand written information**
- Outside/inside of actual folder did contain hand written information**
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6240
NREAD
MAR 18 1987

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commanding General, 2d Force Service Support Group, Marine Corps Base, Camp Lejeune

Subj: HAZARDOUS WASTE MANAGEMENT COMPLIANCE INSPECTIONS; RESULTS OF

Ref: (a) BO 6240.5
(b) CG MCB 2916252 Oct 86

Encl: (1) Hazardous Waste Management Compliance Inspection Report for 2d LOGSPTBN, 2d FSSG of 2 Mar 87
(2) Hazardous Waste Management Compliance Inspection Report for 2d FORECONCO, 2d FSSG of 3 Mar 87
(3) Hazardous Waste Management Compliance Inspection Report for 2d ANGLICO, 2d FSSG of 3 Mar 87
(4) Hazardous Waste Management Compliance Inspection Report for 2d RADBN, 2d FSSG of 5 Mar 87

1. The subject inspections were conducted by Base environmental personnel in accordance with references (a) and (b). Enclosures (1) through (4) provide findings, recommendations and supporting information relative to the subject inspections. It should be noted that discrepancies cited in enclosures (1) & (4) are violations of Environmental Protection Agency regulations described in reference (a).

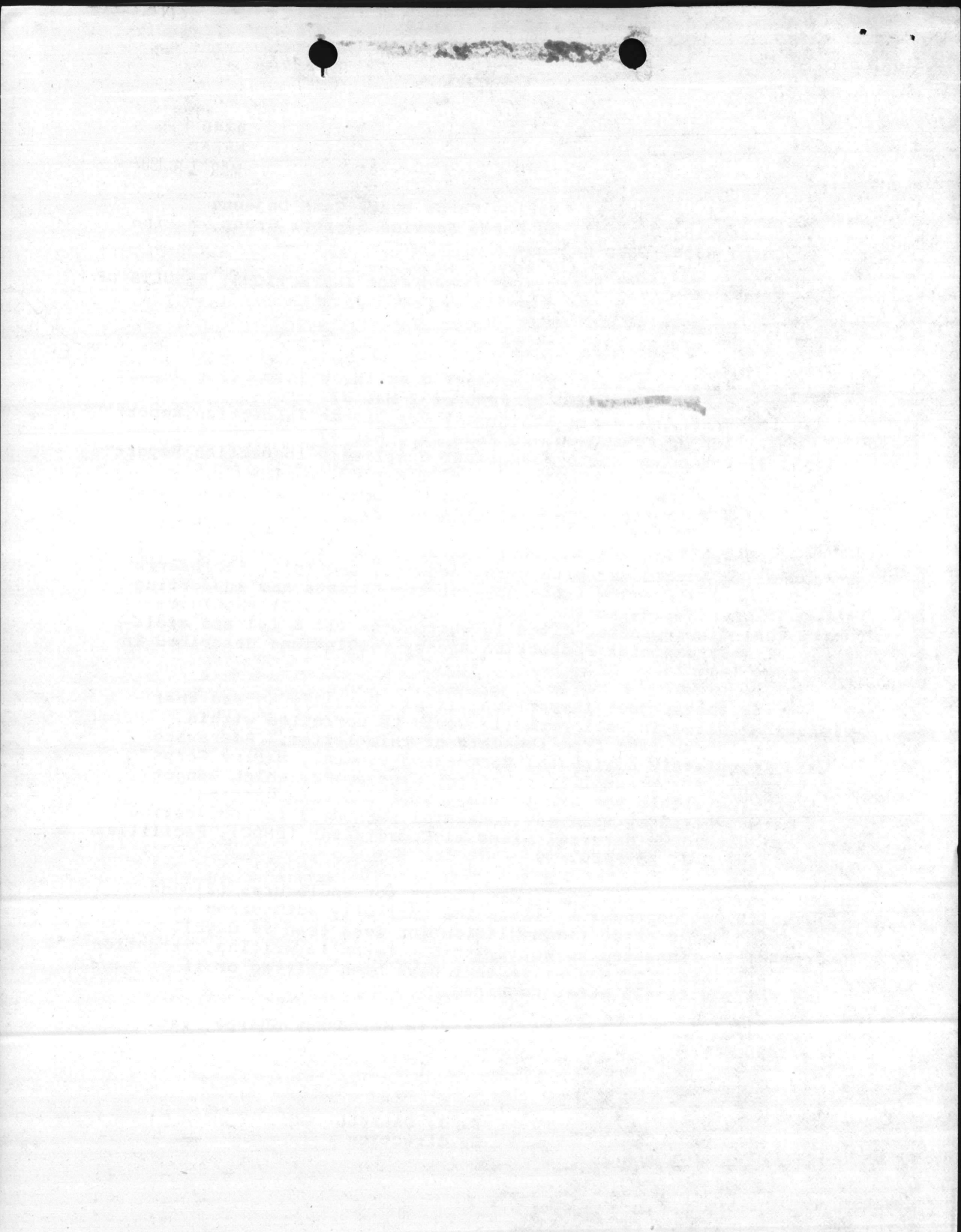
2. During the subject inspection, it was mutually agreed that violations cited in enclosure (1) would be corrected within fifteen calendar days from the date of this letter. Addressee should immediately notify the Commanding General, Marine Corps Base, Attn: AC/S, Facilities, of any discrepancy which cannot be corrected within the stated time frame. A reinspection will be conducted by Base environmental personnel in cooperation with the Hazardous Material Disposal Coordinator (HMDC), Facilities and Safety, G-4, 2d FSSG.

3. Appendix B of each enclosure except for enclosures (2) and (3), which are appendix A, lists the currently authorized HW generation and storage (accumulation for less than 90 days). Addressee is requested to notify this command in writing, attention AC/S, Facilities, of any sites that have been omitted or if there are additional sites required.

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

T. J. DALSELL
By direction

Env/L



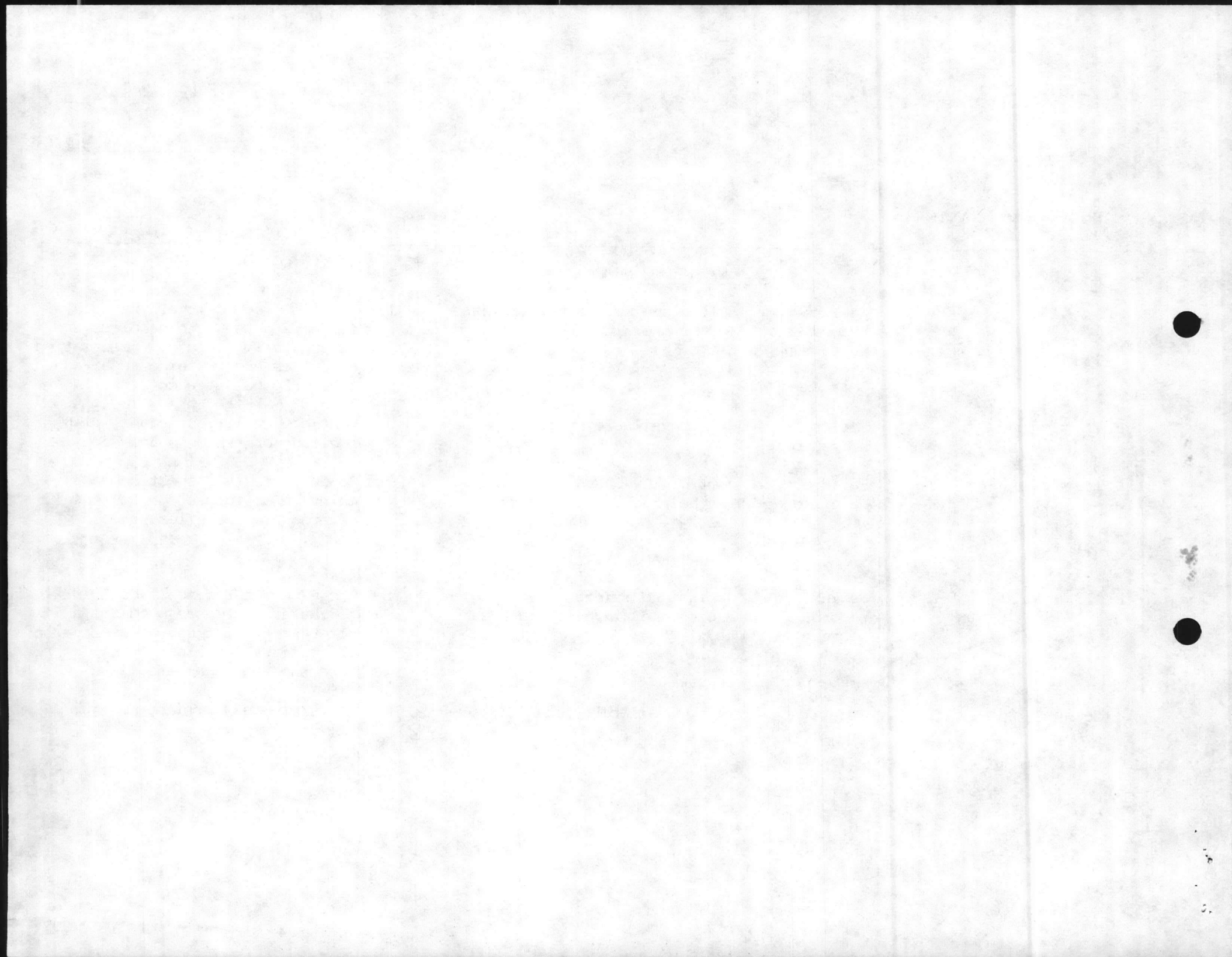
ORGANIZATION:

2d FSSG
2d LOGSPTBN

INSPECTION DATE: 2 March 1987

INSPECTOR'S NAME Sammy Gwynn

NO.	SPECIFIC LOCATION	DISCREPANCY	REF	RECOMMENDED CORRECTIVE ACTION
1.		<u>COMMUNICATIONS SHOP</u>		
a.	Bldg. #1871	Failure to establish and maintain training records for all personnel involved in hazardous waste management.	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. #1871	Failure to identify available spill response and supplies	2	Complete spill contingency plan section for response and supplies.
c.	Bldg. #1871	Failure to conduct weekly inspections and maintain a log of hazardous waste sites.	3	Conduct weekly inspections and maintain an inspection log on all hazardous waste sites.
2.		<u>MHE MOTOR TRANSPORT</u>		
a.	Bldg. #FC-120	Failure to establish and maintain training records for all personnel involved in hazardous waste management.	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. #FC-120	Failure to identify available spill response and supplies.	2	Complete spill contingency plan section for response and supplies.



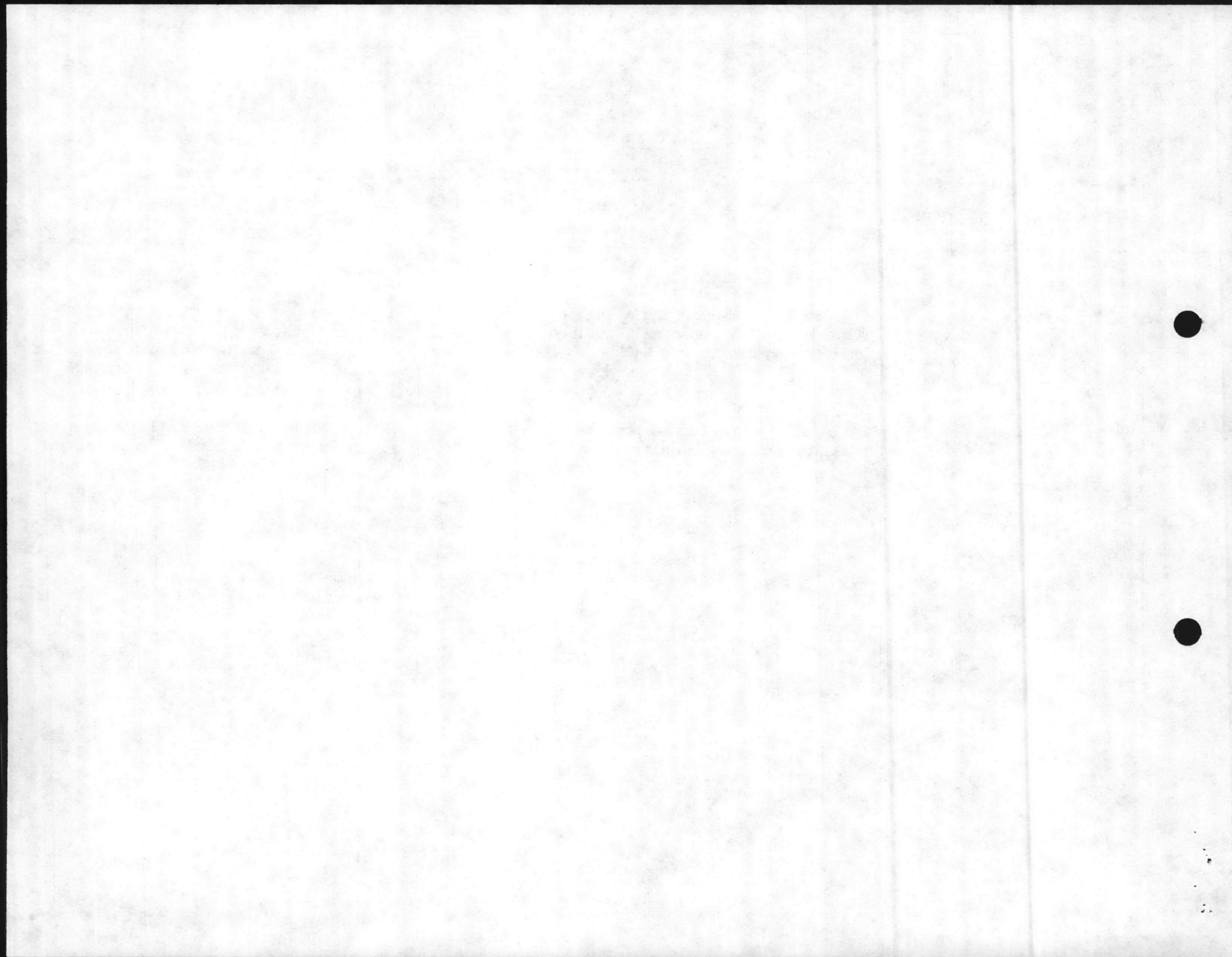
ORGANIZATION:

2d FSSG
2d LOGSPTBN

INSPECTION DATE: 2 March 1987

INSPECTOR'S NAME Sammy Gwynn

NO.	SPECIFIC LOCATION	DISCREPANCY	REF	RECOMMENDED CORRECTIVE ACTION
3.		<u>ARMORY</u>		
a.	Bldg. #FC-302	Failure to establish and maintain training records for all personnel involved in hazardous waste management.	1	Training records shall be maintained for hazardous was handlers and alternate to include a description of duties and training received for personnel at each site.
b.	Bldg. #FC-302	Failure to complete and post hazardous waste spill contingency plan.	2	Complete and post spill contingency plan at all hazardous waste sites.

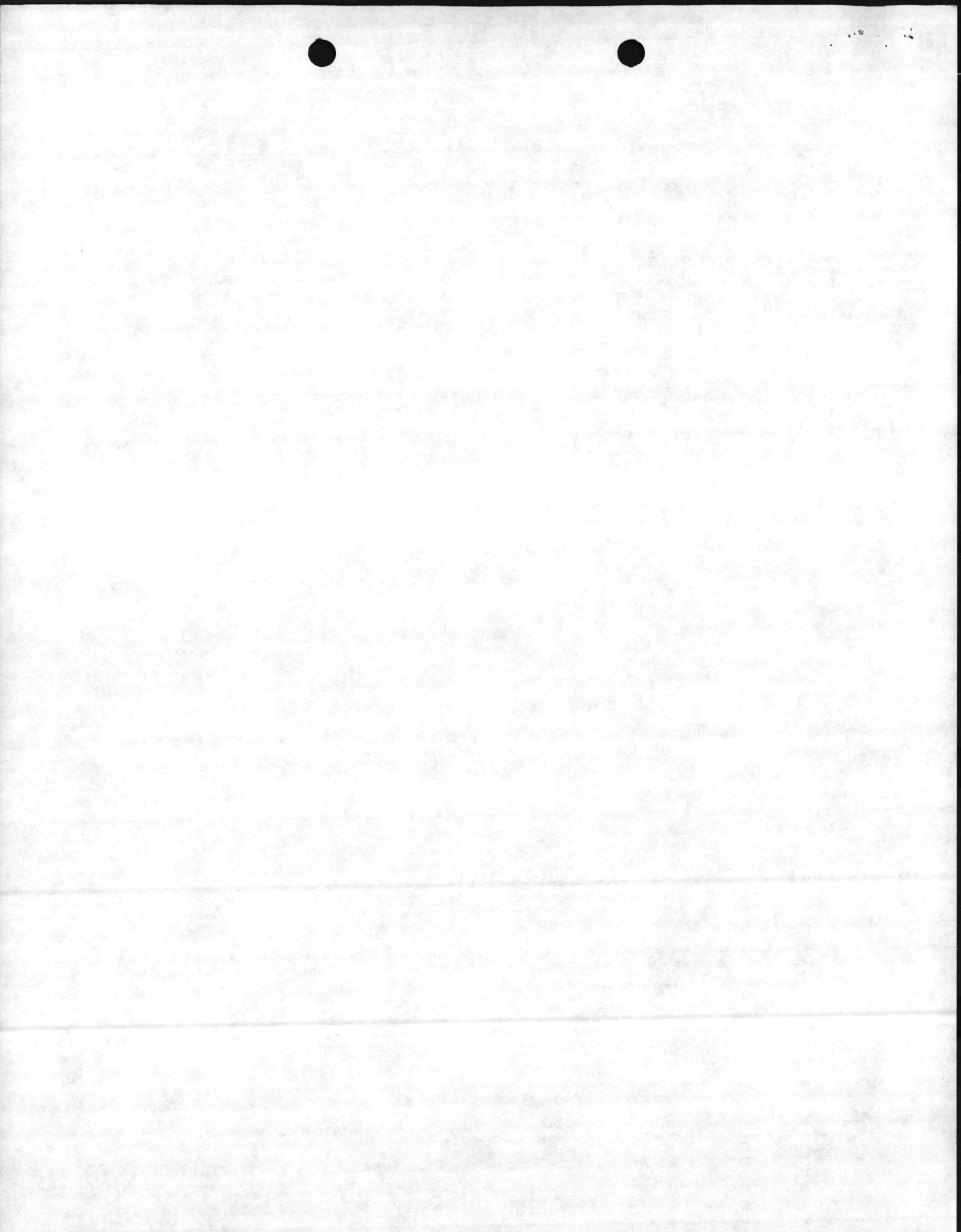


REFERENCES:

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. CG ltr 6240 NREAD of 10 Nov 86. Provided by 6240 NREAD 20 Nov 86
requires the posting and development of sites specific hazardous
waste spill responsibilities prevention and related guidance.

3. BO 6240.5 para 4.a(5) provide weekly inspections of all areas
used to store hazardous waste and take action required to prevent
and correct leaks, spills, and other discrepancies. Maintain a
log of those inspections.



AUTHORIZED HAZARDOUS WASTE GENERATION & STORAGE SITES FOR
2d LOGSPT BN, 2d FSSG

SITE NO. 1
GENERATION/ACCUMULATION

BLDG. #1871, Communications Shop
LITHIUM BATTERIES

SITE NO. 2
GENERATION/ACCUMULATION

BLDG. #FC-120, MHE Motor Transport
DRY CLEANING SOLVENT, ELECTROLYTE

SITE NO. 3
GENERATION/ACCUMULATION

BLDG. #FC-302, Armory
DRY CLEANING SOLVENT

190271

HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 2 MARCH 871. Facility Being Inspected: 2D LOGSPTBN LSB Comm Shop2. Organization in Charge: 2d FSSG3. Inspection Participants/Phone Number: Aysat HermisR - 1738-5228 Bldg 1871 TOP LOUE SOY4. Description of HW Streams: Lithium BatteriesICPL Kling LITH BATT5. Are records of HW generation consistent with HW streams? yes

6. HW Training

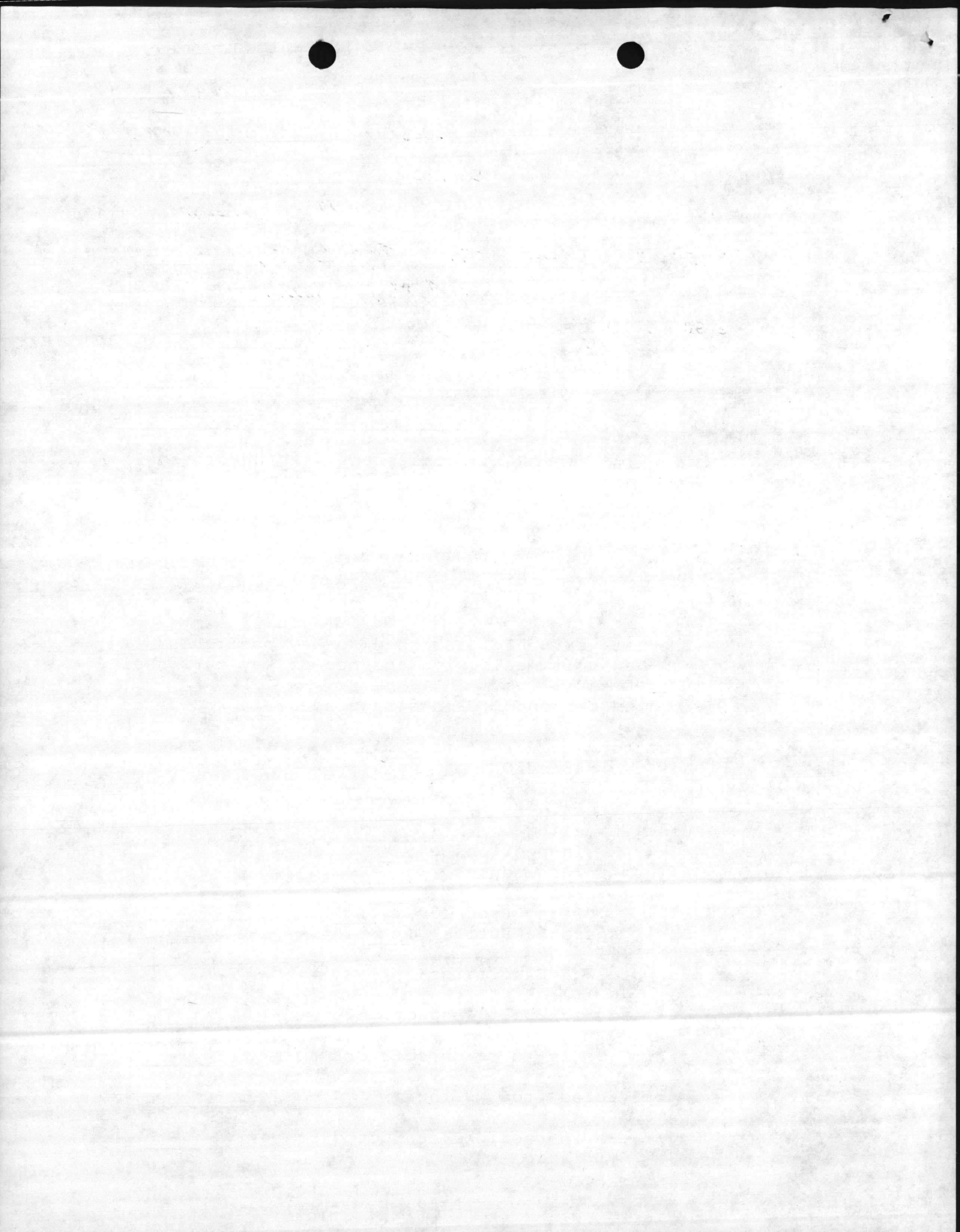
a. Are job descriptions available for all personnel actively involved in HW management? NOb. Are training records adequate/current? NOc. Are alternate personnel assigned to key positions? NO
(If not, explain how unit deals with absence of key personnel)

d. Do contacted personnel demonstrate adequate knowledge of:

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

7. Condition of Storage Facilities

a. Date of last Fire Dept Inspection? 2-19-87b. Are spills likely to reach soil or water? NOc. Are HW protected from weather? YESd. Are weekly HW inspections conducted properly? NO



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? _____

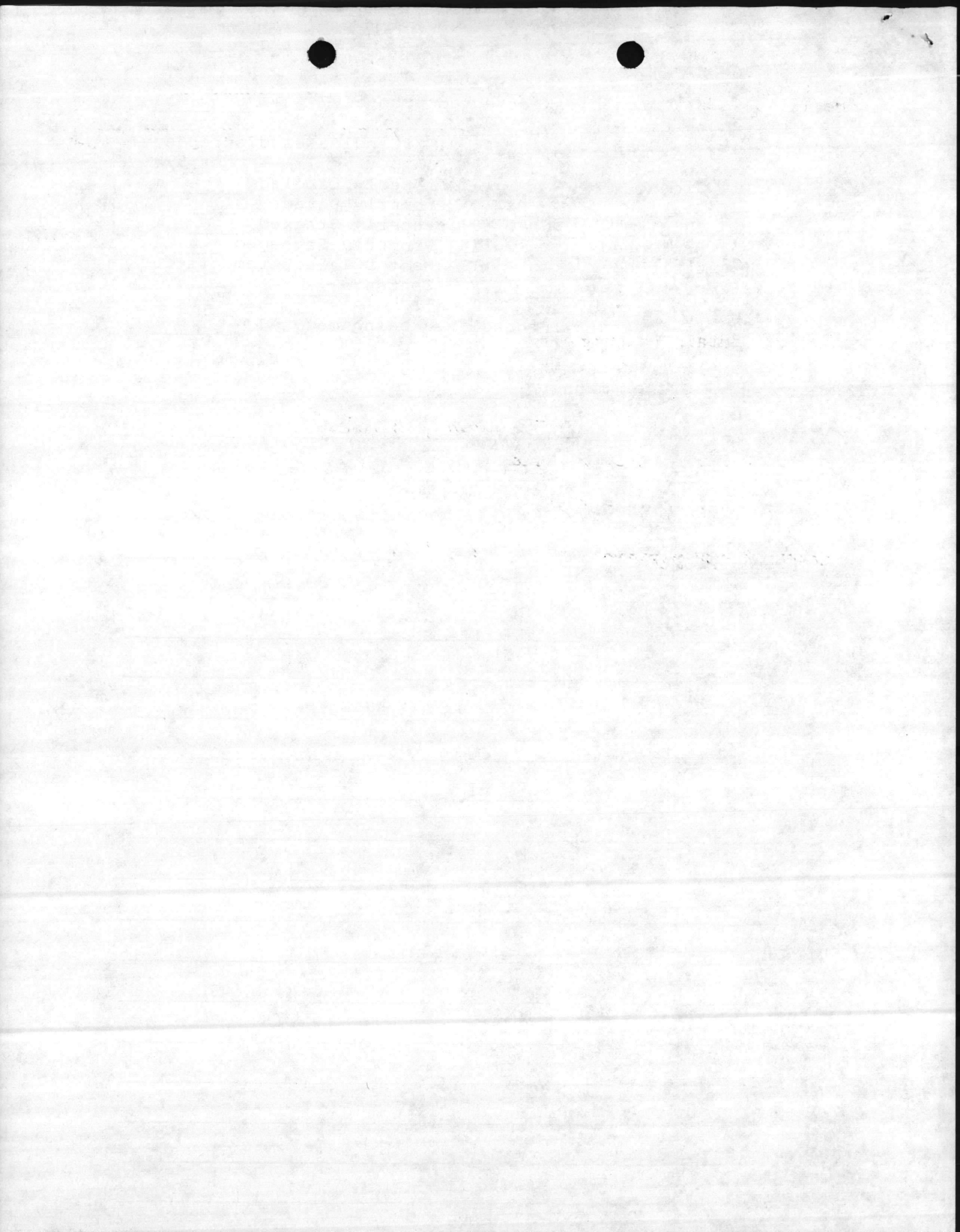
h. Are HW turn-in documents being prepared and submitted in a timely, proper manner? _____

i. Comments: LITHIUM BATTERIES

TRNG Records = NOT Complete

WEEKLY IWSP = NOT Complete

Spill Contingency Plan was not filled out



INSPECTION FORM FOR HAZARDOUS WASTE HANDLING AND STORAGE AREAS

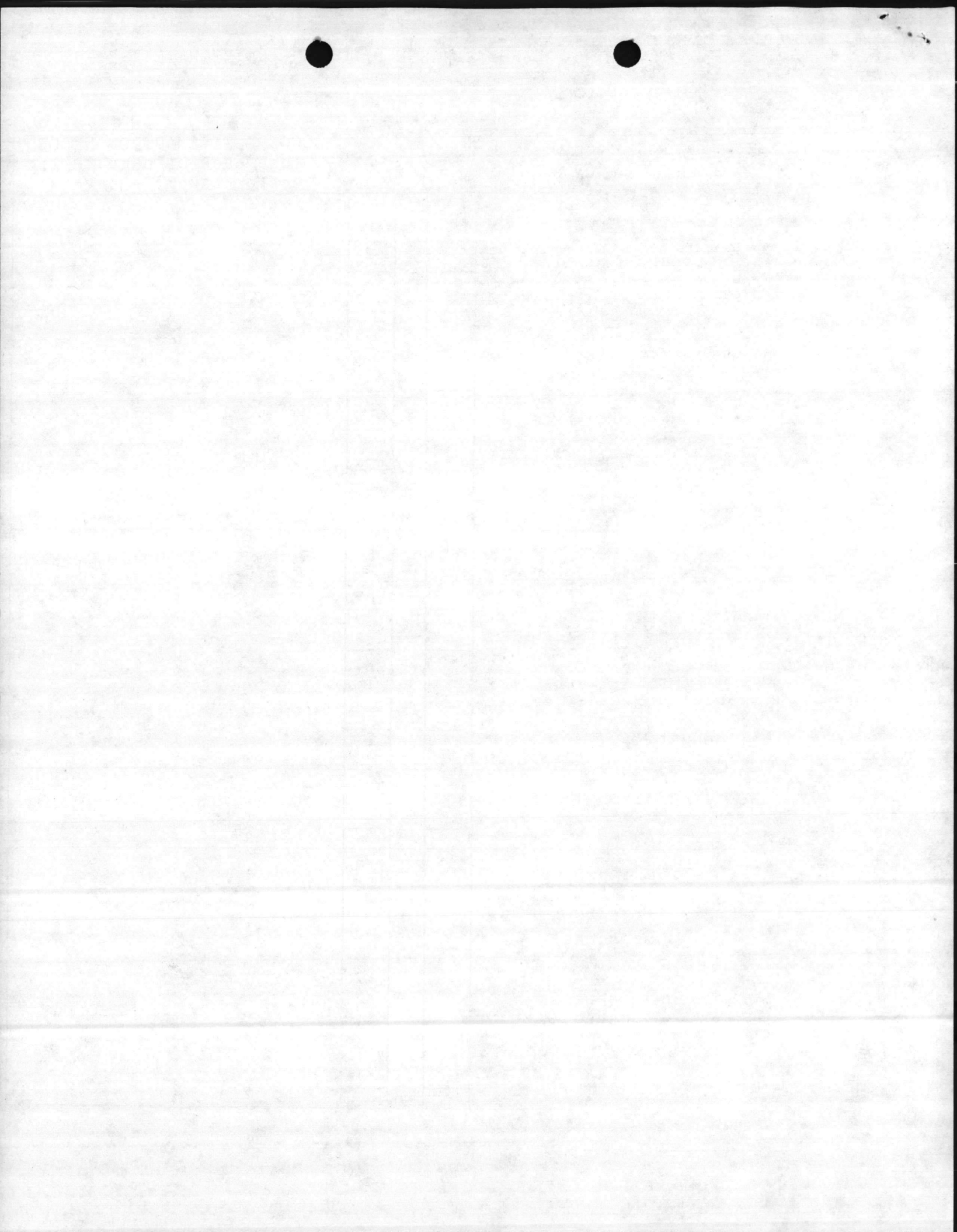
Name of Facility: _____

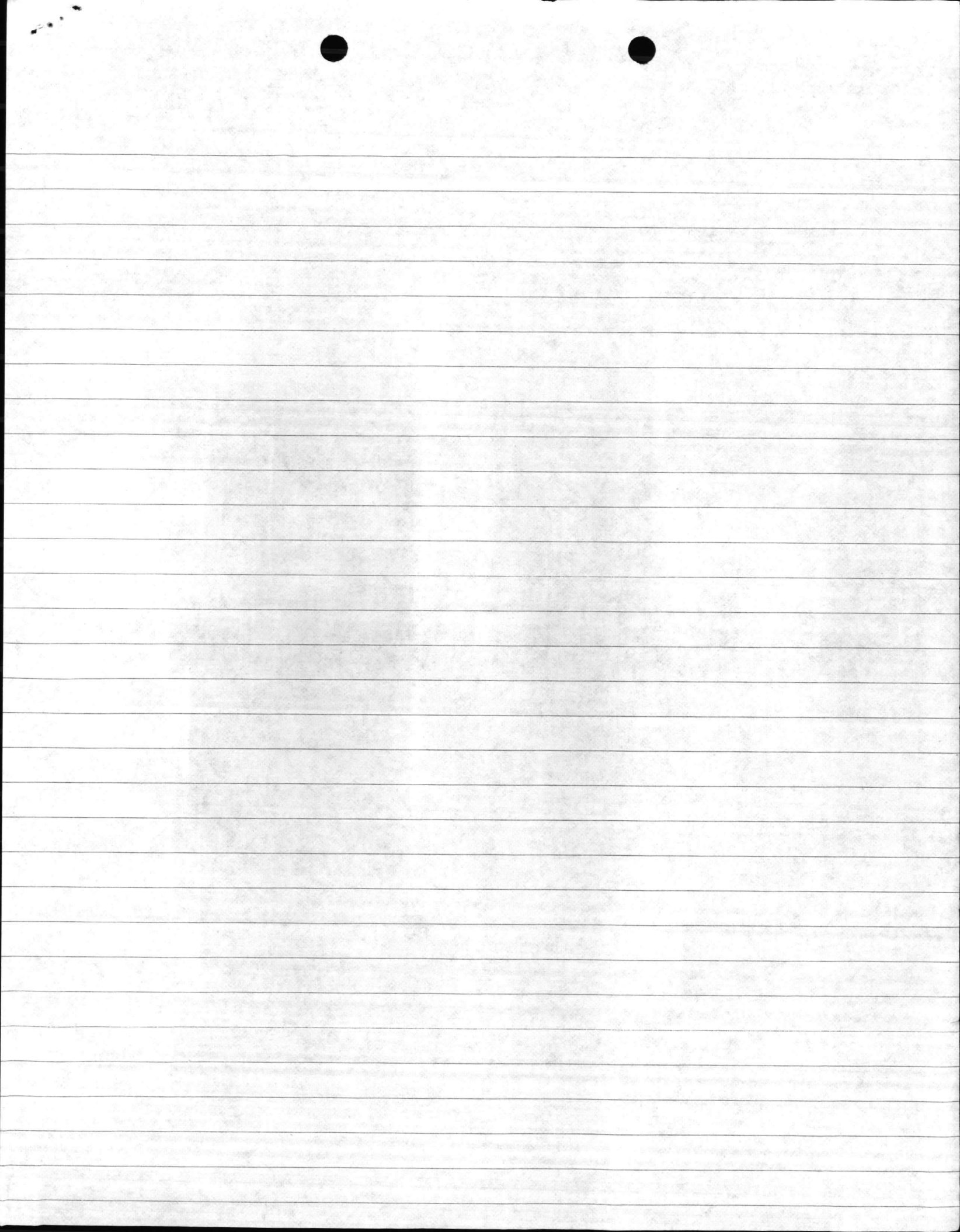
Name/Title OIC: _____

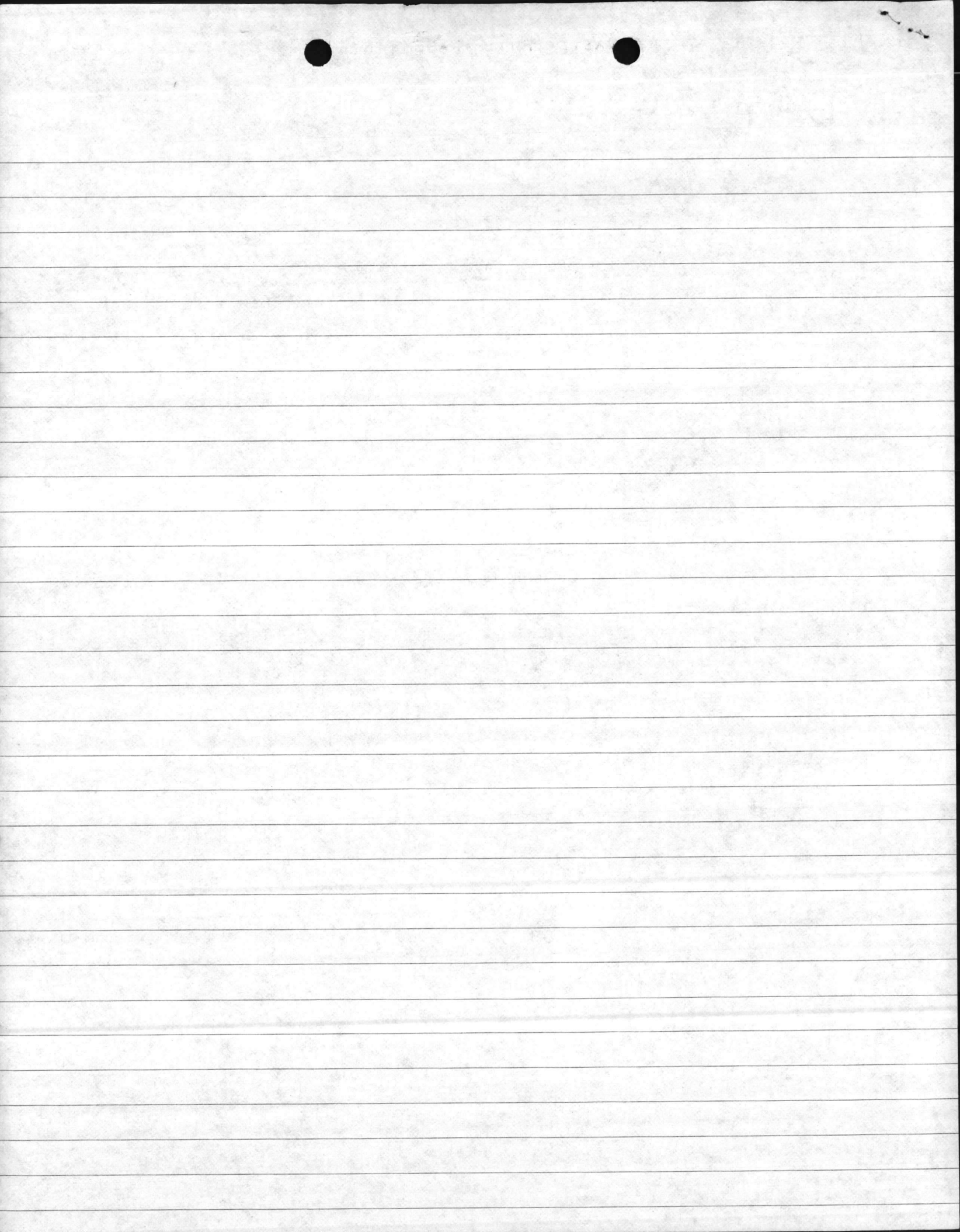
AREA OF CONCERN	YES		NO	CORRECTIVE ACTION NEEDED (use back of page to log action taken)
<p><u>A. CONDITION OF CONTAINERS</u></p> <p>1. Are containers closed</p> <p>2. Are containers leaking</p> <p>3. Are containers bulging</p> <p>4. Are containers collapsed</p> <p>5. Are containers corroded</p> <p>6.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

DATE: _____

SIGNATURE: _____







HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 2 March 871. Facility being Inspected: 2d LOCUSTON FC-120 MHE MOTOR TRANSPORT2. Organization in Charge: 2d FSSG phone: 5279 3927-31053. Inspection Participants/Phone Number: Myast Perry (Room)NO ALTERNATE4. Description of HW Streams: Cleaning Solvents, & Electrolyte Bat5. Are records of HW generation consistent with HW streams? yes

6. HW Training

a. Are job descriptions available for all personnel actively involved in HW management? yesb. Are training records adequate/current? noc. Are alternate personnel assigned to key positions? part
(If not, explain how unit deals with absence of key personnel)

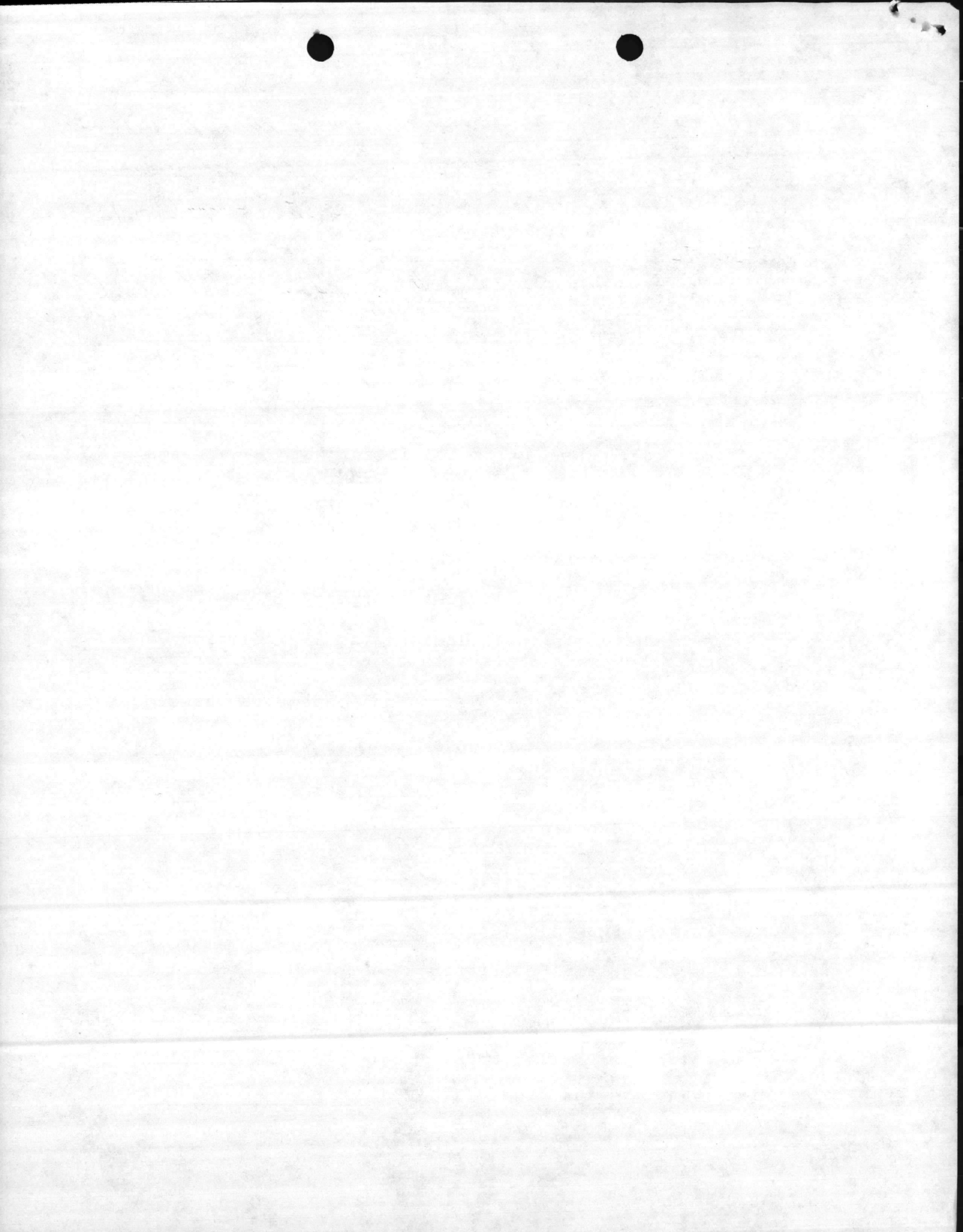
d. Do contacted personnel demonstrate adequate knowledge of:

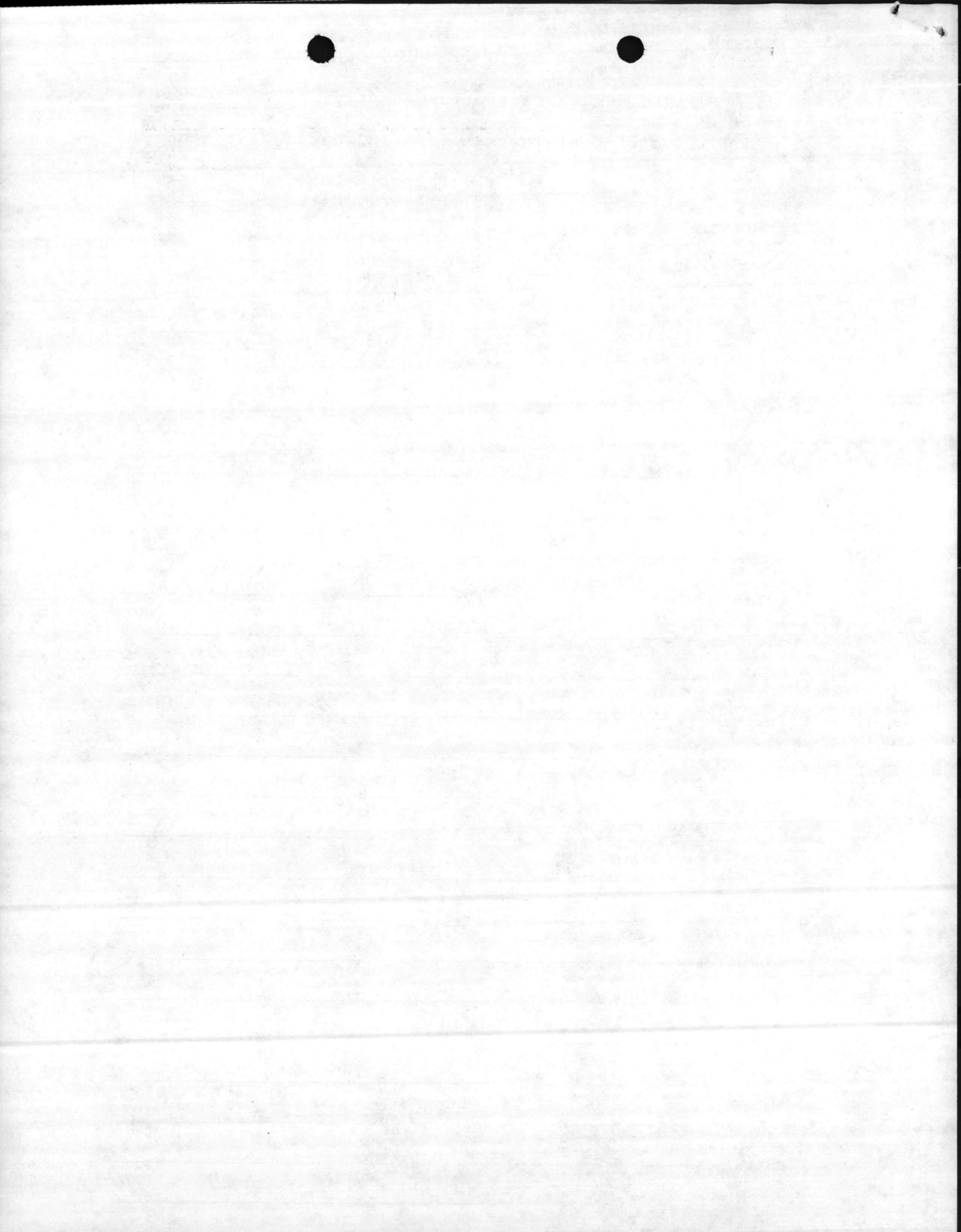
- | | |
|--------------------------------|-------------|
| (1) Regulatory Requirements | <u>yes</u> |
| (2) Applicable Base Orders | <u>yes</u> |
| (3) Types of HW Handled | <u>yes</u> |
| (4) Proper Containers | <u>yes</u> |
| (5) Proper Labeling | <u>yes</u> |
| (6) Weekly HW Inspections | <u>part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

7. Condition of Storage Facilities

a. Date of last Fire Dept Inspection? _____

b. Are spills likely to reach soil or water? yesc. Are HW protected from weather? nod. Are weekly HW inspections conducted properly? yes





INSPECTION FOR FOR HAZARDOUS WASTE HANDLING AND STORAGE AREAS

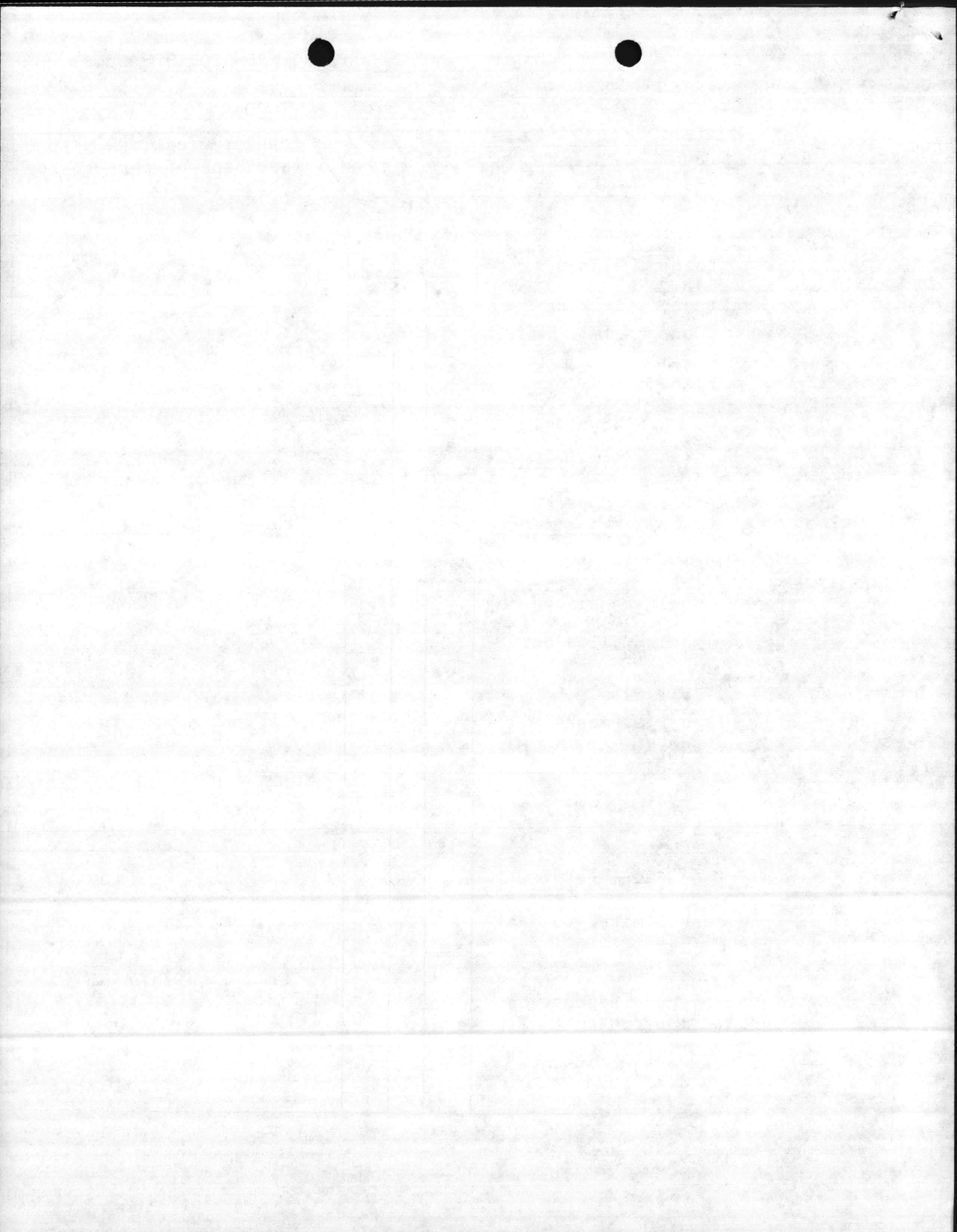
Name of Facility: _____

Name/Title OIC: _____

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

DATE: _____

SIGNATURE: _____



TRNG RECORDS = SHOULD BE COMPLETE

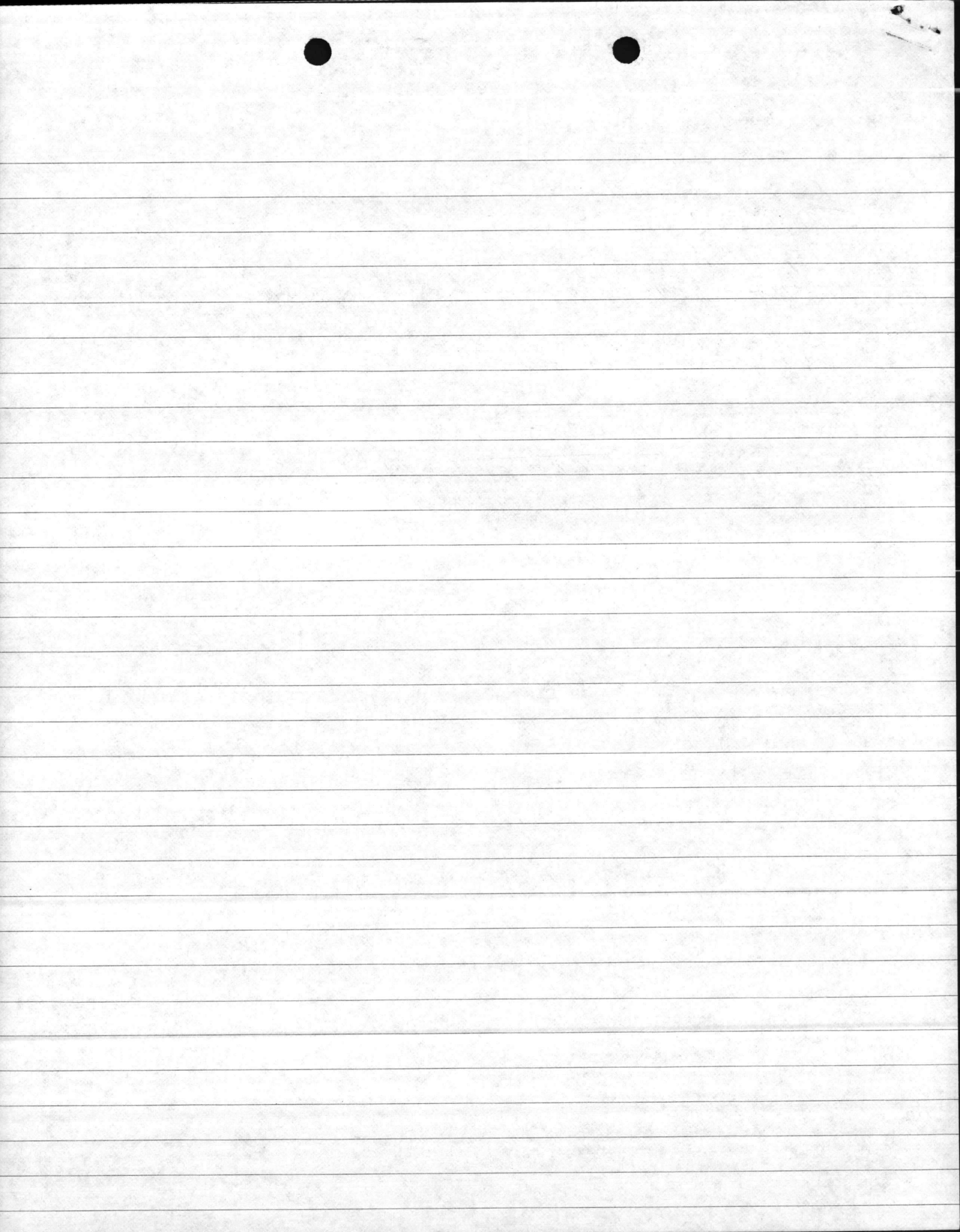
WKLY INSP -- OK

CONTINGENCY PLAN = NOT COMPLETE NO TRNG RECORD ON ALI

Battery room is flushing electrolyte down drain

~~SIGN ON POL AREA NOT POSTED~~

~~NO SIGN IN HW AREA OR POL AREA~~



HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 2 MARCH 87

1. Facility being Inspected: 2d LOGSPT BN FC-302 ARMORY
2. Organization in Charge: 2d FSSG OH = 3832
3. Inspection Participants/Phone Number: Sgt Thomas (Room)
1cpl Taylor (Alt)
4. Description of HW Streams: Dry Cleaning Solvents, P.D. 680

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

6. HW Training

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

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 adequate knowledge of:

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

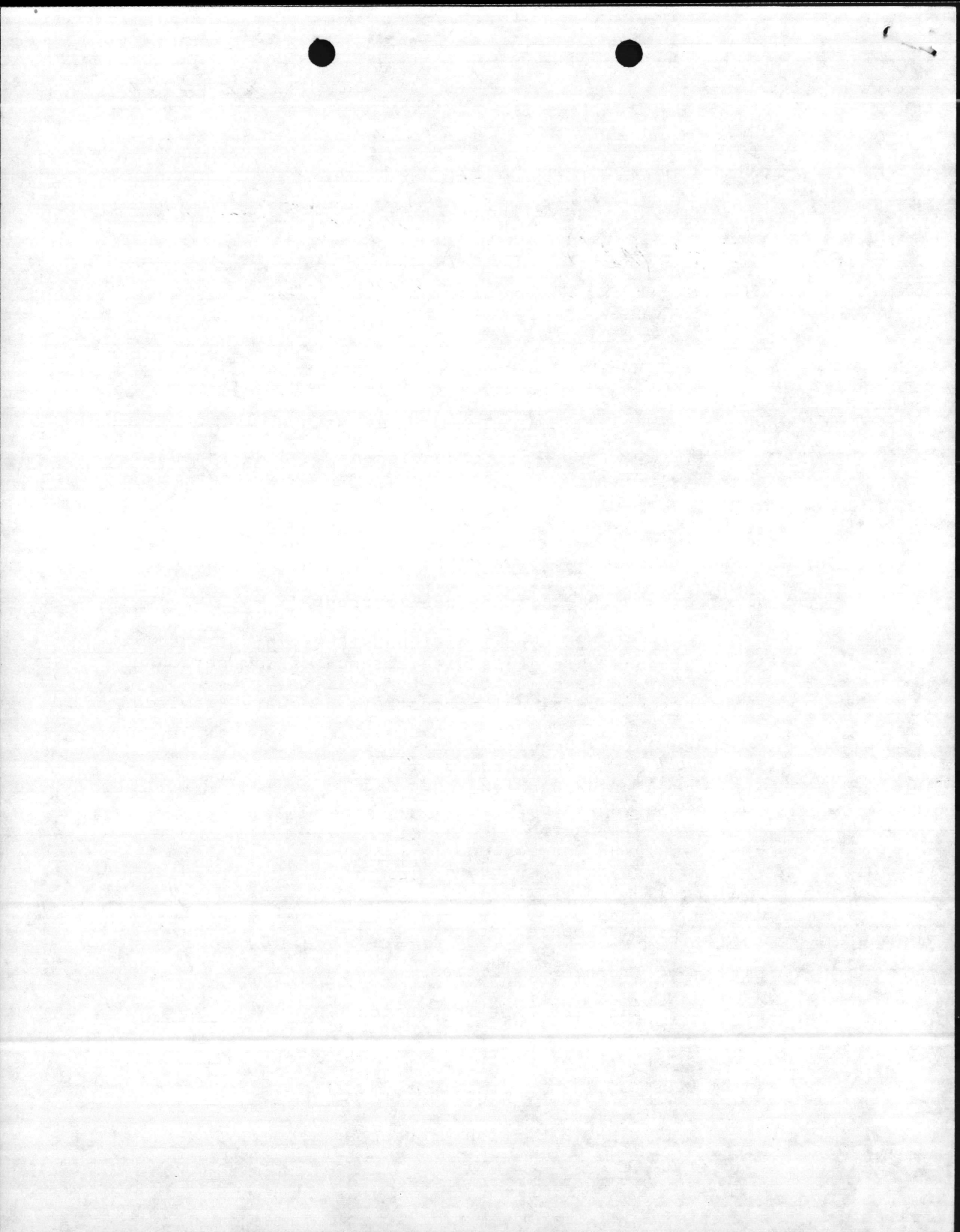
7. Condition of Storage Facilities

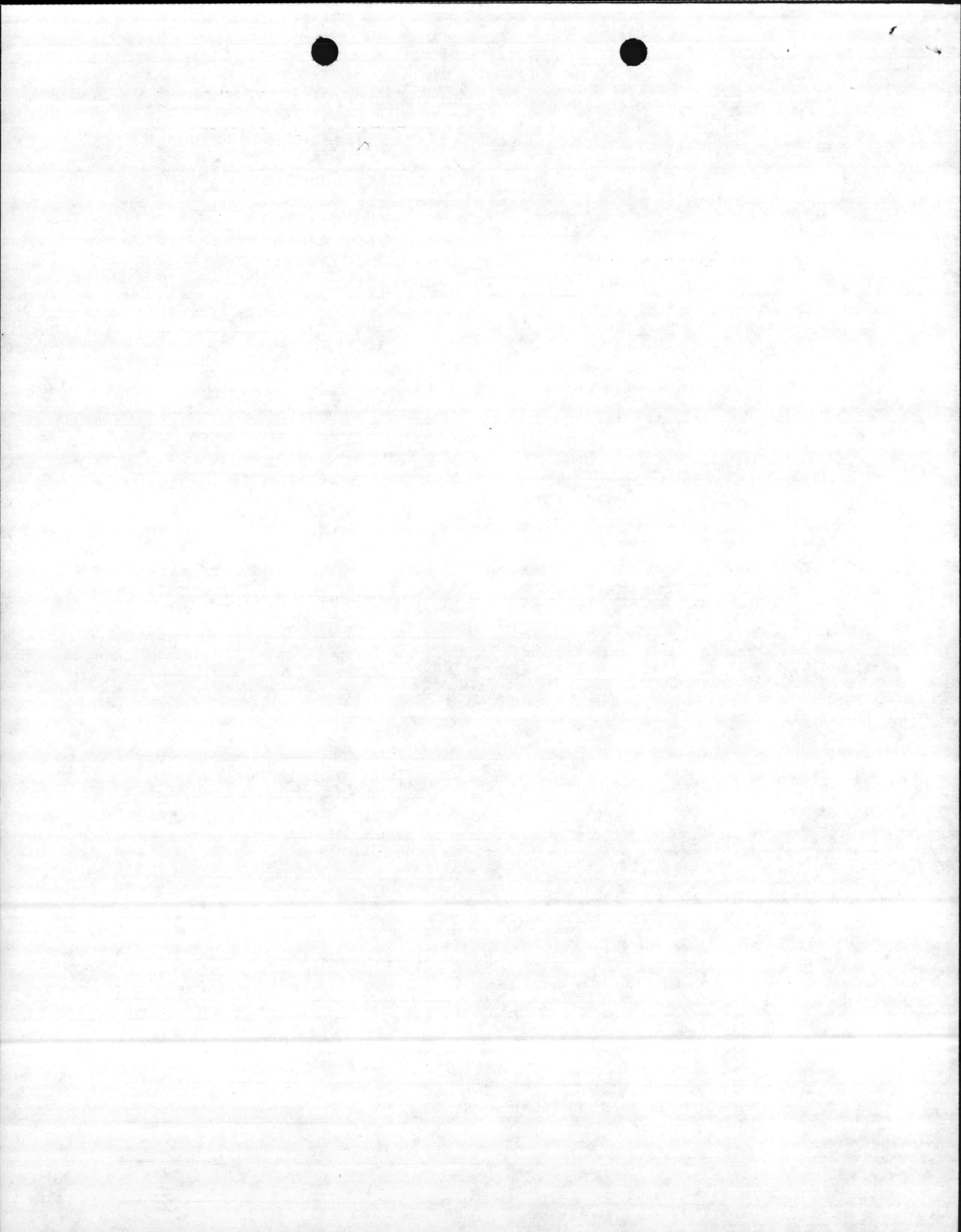
a. Date of last Fire Dept Inspection? _____

b. Are spills likely to reach soil or water? YES

c. Are HW protected from weather? NO

d. Are weekly HW inspections conducted properly? YES





INSPECTION FORM FOR HAZARDOUS WASTE HANDLING AND STORAGE AREAS

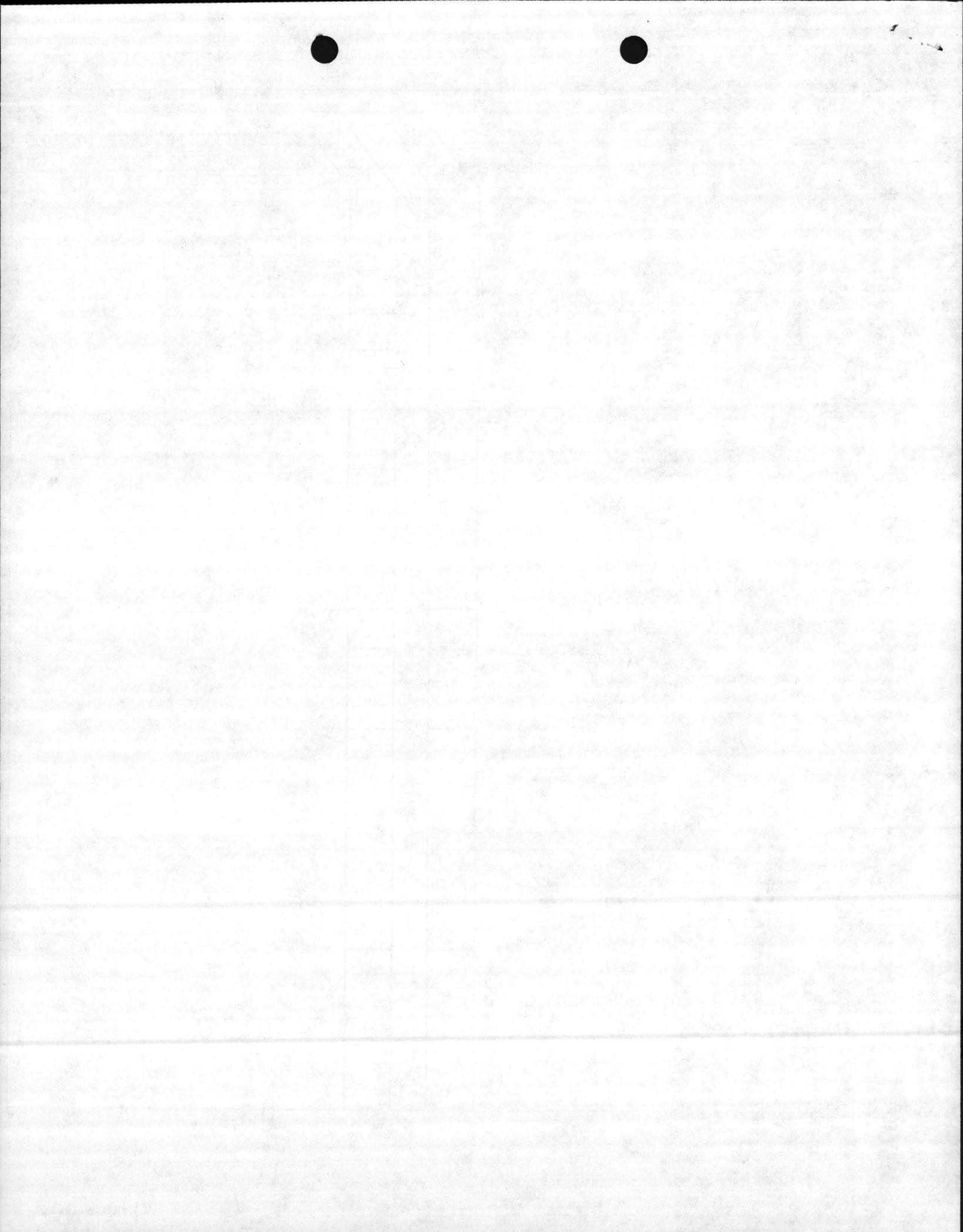
Name of Facility: _____

Name/Title OIC: _____

AREA OF CONCERN	YES		NO	CORRECTIVE ACTION NEEDED (use back of page to log action taken)
<p><u>A. CONDITION OF CONTAINERS</u></p> <p>1. Are containers closed</p> <p>2. Are containers leaking</p> <p>3. Are containers bulging</p> <p>4. Are containers collapsed</p> <p>5. Are containers corroded</p> <p>6. Are containers over-filled</p> <p>7. Other problems present</p>				
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DATE: _____

SIGNATURE: _____



Contingency plan = NOT Comp + POST

Wally JWSI = OK

TRNG RECORDS = NOT Comp NO RECORD ON TAYLOR

NO SIGN IN HW AREA ✓

