Bet2/Barber UNCLASSIFIED. U U 1 . . . Math . . . . . . . . . . 1. . 1 6 a .s ! Tall . **和学,**容淡、柔柔、深沉、""。 ADMINISTRATIVE MESSAGE and site that we have **。在1998年前,他们的** ROUTINE A SAMPLE AND AND AND 201901Z AUG 87 ZYB **新行动和学校的地址**的主义系。 FM CG MCB CAMP LEJEUNE NC · A Adamsta TO CMC WASHINGTON DC CG SECOND FSSG INFO CG SECOND MARDIV HO NUC II MAF CG II MAF MCAS NEW RIVER NC CG SIXTH MAB NAVDENCLINIC CAMP LEJEUNE NC NAVHOSP CAMP LEJEUNE NC DRMD CAMP LEJEUNE NC LANTNAVFACENGCOM NORFOLK VA (1) 可以可以通知的。 MCB CAMP LEJEUNE NC 和"魏学"。 建筑 化分子 A STATE AND A STATE AN UNCLAS //N06280// SECTION 01 OF 03 //N06280// Real Providence Pre-CMC//CODEXLFL//LANTDIV FOR 2032// SUBJ: HAZARDOUS WASTE MANAGEMENT PROGRAM, REPORT OF NOTICE OF VIOLATION Bar Barrer States A the Marier A. MCD P11000.6B CG MCB CAMLEJ NC 052154Z MAR 87 们在这个大学和多少的 IN ACCORDANCE WITH REF A, THE FOLLOWING INFORMATION IS SUBMITTED 1. DN THE SUBJ MATTER. A COMPLIANCE DRDER, DOCKET NO. 87-493 WAS ISSUED TO MARINE CORPS BASE, CAMP LEJEUNE, NC ON 11 AUG 1987, RECEIPTED BY THIS COMMAND ON 17 AUG 1987, FOR CERTAIN VIOLATIONS OF THE NORTH CAROLINA SOLID WASTE MANAGEMENT ACT AND RULES, N.C.G.S. 130A, ARTICLE 9 (ACT), AND THE NORTH CAROLINA HAZARDOUS WASTE MANAGEMENT RULES, 10 NCAC 10F (RULES). DLVR:CG SIXTH MAB(7) ... INFR DLVR : NAVDENCLINIC CAMP LEJEUNE NC(4) ... INFO DLVR:NAVHOSP CAMP LEJEUNE NC(4) ... INFO DLVR: DRMO CAMP LEJEUNE NC(4) ... INFO DLVR: HQ NUC II MAF(7) ... INFO 和最早的原始的。2014年,2014年,2014年,1914年 /13/ BFAC(2)... DRIG FOR CG MCB CAMP LEJEUNE(117) DICB(1) BCDS(1) BSDD(1) CEDA(1) GSTF(12) SSTF(85) DCDR(14) / 8/0116 G-4(1)... INFO FOR CG II MAF(3) CFU(1) 5-S(1) the state of the RTD:000#144/COPIES:0146

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PURSUANT TO N.C.G.S. &30A-22(A), AN ADMINISTRATIVE PENALTY UF 2. PURSUANT TO N.C.G.S. &30A-22(A), AN ADMINISTRATIVE PENALTY UF 30,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 130,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 130,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 130,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 130,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 130,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 130,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 1400 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 1400 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 150,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLIANCE ORDER. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLEX. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLEX. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLEX. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLEX. HOWEVER, IN THE STATE 160,000 WAS IMPOSED ON THE COMPLEX. HOWEVER, INTERNATION ON THE STATE 160,000 WAS IMPOSED ON THE COMPLEX. HOWEVER, INTERNATION ON THE STATE 160,000 WAS IMPOSED ON THE COMPLEX. HOWEVER, INTERNATION ON THE STATE 160,000 WAS IMPOSED ON THE STATE 160,000 WAS IMPOSED ON THE COMPLEX. HOWEVER,

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THE COMPLIANCE DRDER WAS ISSUED BASED UPON AN INSPECTION PERFORMED AT GAMP LEJEUNE BY REGION IV US EPA IN CONJUNCTION WITH NORTH CAROLINA SOLID AND HAZARDOUS WASTE MANAGEMENT BRANCH AT WHICH IT WAS DETERMINED THAT CAMP LEJEUNE IS IN VINLATION OF CERTAIN REQUIREMENTS OF THE ACT AND RULES AS SET FORTH IN THE COMPLIANCE THE CAMP LEJEUNE FACILITY WAS FOUND TO BE IN VIOLATION OF CERTAIN REQUIREMENTS CONTAINED IN 40 CFR 262, AND 264, CODIFIED AT 10 NCAC 10F .0030, AND .0032 RESPECTIVELY, SPECIFICALLY! 40 CFR 262.34(A), CODIFIED AT 10 NCAC 10F .0030, STATES THAT EXCEPT AS PROVIDED IN PARAGRAPHS (D), (E) AND (F) OF THIS SECTION, A GENERATOR MAY ACCUMULATE HAZARDOUS WASTE ON-SITE FOR 90 DAYS OR LESS WITHOUT & PERMIT OR WITHOUT HAVING INTERIM STATUS, PROVIDED THAT: (1) THE WASTE IS PLACED IN CONTAINERS AND THE GENERATOR COMPLIES WITH SUBPART I NF 40 CFR PART 265. 40 CFR 265.171 (SURPART I), CODIFIED AT 10 NCAC 10F .0033 STATES THAT IF A CONTAINER HOLDING HAZARDOUS WASTE IS NOT IN GOUD GONDITION OR IF IT BEGINS TO LEAK, THE OWNER OR OPERATOR MUST TRANSFER THE HAZARDOUS WASTE FROM THIS CONTAINER TO A CONTAINER THAT IS IN GOOD CONDITION OR MANAGE THE WASTE IN SOME OTHER WAY THAT COMPLIES WITH THE REQUIREMENTS OF THIS PART. CAMP LEJEUNE IS IN VIOLATION OF 262.34(A)(1), CODIFIED AT 10 NCAC 10F . 0030 IN THAT IT DID NOT TRANSFER THE CONTENTS OF A DENTED CONTAINER TO A CONTAINER THAT IS IN GOOD CONDITION AT THE GENERATOR SITE ... (THESE HAZARDOUS WASTES MAY BE STORED AT THE PERMITTED STORAGE AREA FOR MORE THAN 90 DAYS). 40 CFR 262.34(A), CODIFIED AT 10 NCAC 10F .0030 STATES THAT EXCEPT AS PROVIDED IN PARAGRAPHS (D), (E) AND (F) OF THIS SECTION, A GENERATOR MAY ACCUMULATE HAZARDOUS WASTE ON-SITE FOR 90 DAYS OR LESS WITHOUT & PERMIT OR WITHOUT HAVING INTERIM STATUS, PROVIDED THAT: (3) WHILE BEING ACCUMULATED ON-SITE, EACH CONTAINER AND TANK IS LABELED OR MARKED CLEARLY WITH THE WORDS, "HAZARDOUS WASTE." CAMP LEJEUNE IS IN VIOLATION OF 262.34(A)(3), CODIFIED AT 10 NCAC 10F . 0030 IN THAT IT DID NOT MARK ALL ITS CONTAINERS WITH THE WORDS "HAZARDOUS WASTE" AT THE GENERATOR SITE. C. 40 CFR 262.34(A), CODIFIED AT 10 NCAC 10F .0030 STATES THAT EXCEPT AS PROVIDED IN PARAGRAPHS (D), (E) AND (F) OF THIS SECTION, A GENERATOR MAY ACCUMULATE HAZARDOUS WASTE ON-SITE FOR 90 DAYS OR LESS WITHOUT & PERMIT OR WITHOUT HAVING INTERIM STATUS, PROVIDED THAT: (4) THE GENERATOR COMPLIES WITH THE REQUIREMENTS FOR OWNERS OR OPERATORS IN SUBPARTS C AND D IN 40 CFR PART 265 AND WITH SECTION

265.16. 40 CFR 265.16(A)(1), CODIFIED AT 10 NCAC 10F .0033 STATES THAT FACILITY PERSONNEL MUST SUCCESSFULLY COMPLETE A PROGRAM OF

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CLASSROOM INSTRUCTION OR ON-THE-JOB TRAINING THAT TEACHES THEM TO PERFORM THEIR DUTIES IN A WAY THAT ENSURES THE FACILITY,S COMPLIANCE WITH THE REQUIREMENTS OF THIS PART. THE OWNER OR OPERATOR MUST ENSURE THAT THIS PROGRAM INCLUDES ALL THE ELEMENTS DESCRIBED IN THE ODCUMENT REQUIRED UNDER PARAGRAPH (D)(3) OF THIS SECTION. 40 CFR 265.16(A)(2), CODIFIED AT 10 NCAC 10F .0033, STATES THAT THIS PROGRAM MUST BE DIRECTED BY A PERSON TRAINED IN HAZARDOUS WASTE MANAGEMENT PROCEDURES (INCLUDING CONTINGENCY PLAN IMPLEMENTATION) RELEVANT TO THE POSITIONS IN WHICH THEY ARE EMPLOYED. 40 CFR 265.16(C), CUDIFIED AT 10 NCAC 10F .0033, STATES THAT FACILITY PERSONNEL MUST TAKE PART IN AN ANNUAL REVIEW OF THE INITIAL

TRAINING REQUIRED IN PARAGPAPH (A) OF THIS SECTION, CAMP LEJEUNE IS IN VIOLATION OF 40 CFR 262.34(A)(4), CODIFIED AT 10 NCAC 10F .0030, IN THAT FACILITY PERSONNEL HAVE NOT COMPLETED A PROGRAM OF CLASSROOM INSTRUCTION OR ON-THE-JOB TRAINING THAT TEACHES THEM TO PERFORM THEIR DUTIES IN A WAY THAT ENSURES THE FACILITIES COMPLIANCE WITH THE REQUIREMENTS OF THIS PART AS SPECIFIED BY 40 CFR 265.16(A)(1), AND PERSONNEL DIRECTING THE PROGRAM OF TRAINING IN HAZAROOUS WASTE MANAGEMENT PROCEDURES HAVE NOT BEEN TRAINING IN HAZAROOUS WASTE MANAGEMENT PROCEDURES HAVE NOT BEEN TRAINED IN THOSE PROCEDURES AS SPECIFIED BY 40 CFR 265.16(A)(2) AND FACILITY PERSONNEL PREVIOUSLY TRAINED HAVE NOT TAKEN PART IN AN ANNUAL REVIEW OF THE INITIAL TRAINING REQUIRED BY PARAGRAPH (A) AS SPECIFIED BY 40 CFR 265.16(C).

D. 40 CFR 264.16(C), CUDIFIED AT 10 NCAC 10F .0032, STATES THAT FACILITY PERSONNEL MUST TAKE PART IN AN ANNUAL REVIEW OF THE INITIAL TRAINING REQUIRED IN PARAGRAPH (A) OF THIS SECTION.

CAMP LEJEUNE IS IN VIOLATION OF 40 CFR 264.16(C), CODIFIED AT 10 NCAC 10F .0032 IN THAT FACILITY PERSONNEL PREVIOUSLY TRAINED HAVE NOT TAKEN PART IN AN ANNUAL REVIEW OF THE INITIAL TRAINING REQUIRED BY PARAGRAPH (A) OF THIS SECTION AT THE STORAGE AREA. E. 40 CFR 264.74(A), CODIFIED AT 10 NCAC 10F .0032 STATES THAT ALL RECORDS, INCLUDING PLANS, REQUIRED UNDER THIS PART MUST BE FURNISHED UPON REQUEST, AND MADE AVAYLABLE AT ALL REASONABLE TIMES FOR INSPECTION, BY ANY DEFICER, EMPLOYEE, OR REPRESENTATIVE OF DHR WHO IS DULY DESIGNATED BY THE SECRETARY.

CAMP LEJEUNE IS IN VIOLATION OF 40 CFR 264,74(A), CODIFIED AT 10 NCAS 10F .0032 IN THAT IT COULD NOT PROVIDE UPON REQUEST RECORDS REQUIRED TO BE MAINTAINED BY THE PART B PERMIT.

F. 40 CFR 262.11, CODIFIED AT 10 NCAC 10F .0030, STATES THAT A PERSON WHO GENERATES A SOLID WASTE, AS DEFINED IN 40 CFR 261.2, MUST DETERMINE IF THAT WASTE IS A HAZARDOUS WASTE USING THE FOLLOWING METHOD:

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ADMINISTRATIVE MESSAGE

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FM CG MCR CAMP LEJEUNE NC

TO CMC WASHINGTON DC

INFO CG SECOND MARDIV CG II MAF CG SIXTH MAB NAVHOSP CAMP LEJEUNE NC LANTNAVFACENGCOM NORFOLK VA MCB CAMP LEJEUNE NC

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(1) HE SHOULD FIRST DETERMINE IF THE WASTE IS EXCLUDED FROM REGULATION UNDER 40 CFR 261.4;

(2) HE MUST THEN DETERMINE IF THE WASTE IS LISTED AS A HAZARDOUS WASTE IN SUBPART D OF 40 CFR PART 261.

NOTE: EVEN IF THE WASTE IS LISTED, THE GENERATUR STILL HAS AN OPPORTUNITY UNDER 40 CFR 260.22 TO DEMONSTRATE TO THE ADMINISTRATOR THAT THE WASTE FROM HIS PARTICULAR FACILITY OR OPERATION IS NOT A HAZARDOUS WASTE.

(3) IF THE WASTE IS NOT LISTED AS A HAZARDOUS WASTE IN SUB-PART D OF 40 CFR PART 261, HE MUST DETERMINE WHETHER THE WASTE IS IDENTIFIED IN SUBPART C OF 40 CFR PAPT 261 BY EITHER: (A) TESTING THE WASTE ACCORDING TO THE METHODS SET FURTH IN SUBPART C OF 40 CFR PART 261, OR ACCORDING TO AN EQUIVALENT METHOD APPROVED BY THE ADMINISTRATOR UNDER 40 CFR 260.21; DR

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(B) APPLYING KNOWLEDGE OF THE HAZARD CHARACTERISTIC OF THE WASTE IN LIGHT OF THE MATERIALS OR THE PROCESSES USED. CAMP LEJEUNE IS IN VIOLATION OF 40 CFR 262,11, CODIFIED AT 10

CAC 10 .0030, IN THAT IT HAS NOT DETERMINED IF THE SOLID WASTES IT ENERATES ARE HAZARDOUS WASTES.

G. PERMIT CONDITION - PART IF OF THE PART B PERMIT STATES THAT LL AMENDMENTS, REVISIONS AND MODIFICATIONS TO ANY PLAN REQUIRED BY HIS PERMIT SHALL BE SUBMITTED TO THE SECRETARY OF THE DEPARTMENT OF UMAN RESOURCES FOR APPROVAL AND PERMIT MODIFICATION.

CAMP LEJEUNE IS IN VIOLATION OF PERMIT CONDITION PART I F IN HAT IT FAILED TO SUBMIT TO THE SECRETARY OF THE DEPARTMENT OF HUMAN ESOURCES FOR APPROVAL AND PERMIT MODIFICATIONS CHANGES IN PLANS EQUIRED BY ITS PERMIT.

H. PERMIT CONDITION - PART II L 3 OF THE PART B PERMIT STATES HAT THE BASE FIRE CHIFF WILL, AT LEAST ANNUALLY, REVIEW THE ONTINGENCY PLAN AND THE TYPES OF WASTES LOCATED IN THE HAZARDOUS ASTE STORAGE FACILITY WITH REPRESENTATIVES OF THE NAVAL HOSPITAL ND BASE PROVOST MARSHAL.

CAMP LEJEUNE IS IN VIOLATION OF PERMIT CONDITION - PART II L , IN THAT THE BASE FIRE CHIFF DOES NOT ANNUALLY REVIEW THE ONTINGENCY PLAN AND THE TYPES OF WASTES LOCATED IN THE HAZARDOUS ASTE STORAGE FACILITY.

I. PERMIT CONDITION - PART III C MANAGEMENT OF CONTAINERS TATES THAT THE PERMITTEE SHALL MANAGE CONTAINERS IN ACCORDANCE WITH O CFR 264.173 AS ADOPTED IN 10 NCAC 10F .0032 AND AS DESCRIBED ON AGE 25, PART D DF THE ATTACHMENT.

40 CFR 264.173(B), CODIFIED AT 10 NCAC 10F .0032, STATES HAT A CONTAINER HOLDING HAZARDOUS WASTE MUST NOT BE OPENED, ANDLED, DR STORED IN A MANNER WHICH MAY RUPTURE THE CONTAINER OR AUSE IT TO LEAK.

PART D-1A(1) OF THE ATTACHMENT, DESCRIPTION OF CONTAINERS, TATES THAT CONTAINERS USED TO STORE HM AT THE DPDD ARE EITHER THE RIGINAL SHIPPING CONTAINER OF A DOT-APPROVED CONTAINER, AS LISTED N 49 CFR 100.

CAMP LEJEUNE IS IN VIOLATION OF PERMIT CONDITION PART IIIC ND PERMIT CONDITION PART D-1A(1), IN THAT CONTAINERS OF HAZARDOUS ASTE ARE NOT THE ORIGINAL SHIPPING CONTAINER OR A DOT-APPROVED ONTAINER, AS LISTED IN 40 CFR 100 AND THE CONTAINERS ARE STORED IN MANNER WHICH MAY CAUSE THE CONTAINERS TO RUPTURE.

J. 3005(A) DF RCRA STATES THAT AFTER THE EFFECTIVE DATE OF THAT ART (I.E. PARTS 270 AND 124 DF THIS CHAPTER) THE TREATMENT, STORAGE ND DISPOSAL OF HAZARDOUS WASTE IS PROHIBITED EXCEPT IN ACCORDANCE ITH A PERMIT.

CAMP LEJEUNE IS IN VIOLATION OF 3005RA) OF RCRA IN THAT ITS REATMENT OF HAZARDOUS WASTE WAS NOT IN ACCORDANCE WITH A PERMIT IN HAT IT IS NOT PERMITTED TO TREAT ANY HAZARDOUS ON SITE.

WITHIN 10 DAYS OF RECEIPT OF THE COMPLIANCE ORDER, 28 AUG 1987, ARINE CORPS BASE, CAMP LEJEUNE MUST TAKE ACTION TO CORRECT ALL IDLATIONS AS STATED IN THE COMPLIANCE ORDER. EACH DAY OF CONTINUED

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VIDLATION OF ANY REQUIREMENT OF THE ACT OR RULES, CONSTITUTES A SEPARATE VIOLATION FOR WHICH AN ADDITIONAL PENALTY OF UP TO \$10,000 PER DAY MAY BE IMPOSED. IF THE VIOLATION(S) CONTINUES, CAMP LEJEUNE MAY ALSO BE SUBJECTED TO FURTHER ENFORCEMENT INCLUDING INJUNCTION FROM ANY FURTHER GENERATION OF HW AND SUCH FURTHER RELIEF AS MAY BE NECESSARY TO ACHIEVE COMPLIANCE.

5. CORRECTIVE MEASURES IDENTIFIED IN PARAGRAPH 3 OF REF B HAVE BEEN COMPLETED. IN ADDITION, THE FOLLOWING SPECIFIC ACTIONS WERE TAKEN SUBSEQUENT TO THE 31 MAR-1 APR EPA INSPECTIONS;

A. CONTAINERS OF HW SPECIFICALLY ADDRESSED IN PARAGRAPH 3F ABOVE WERE EXAMINED, TESTED, AND A HW DETERMINATION MADE. ALL WASTE DIL BULK STORAGE TANKS HAVE BEEN TESTED AND A HW DETERMINATION IS BEING CONDUCTED.

B. ALL MEMBERS OF BASE ENVIRONMENTAL STAFF DIRECTLY INVOLVED IN HW MANAGEMENT HAVE BEEN PROVIDED FORMAL HW CLASSROOM TRAINING, FAR EXCEEDING REQUIREMENTS OUTLINED ABOVE.

C. FOURTEEN KEY STAFF MEMBERS WERE PROVIDED 40 HOURS OF FORMAL CLASSROOM TRAINING ON RESPONSE TO HM/HW SPILLS.

D. APPROXIMATELY 75 KEY PERSONNEL ARE SCHEDULED FOR FORMAL CLASSROOM TRAINING IN HW MANAGEMENT DURING THE WEEK OF 8-11 SEP 1987. THIS INCLUDES EXECUTIVE LEVEL PERSONNEL AS WELL AS FIRST LINE SUPERVISORS/MANAGERS.

E. THE BASE HW TRAINING COORDINATOR HAS BEEN SCHEDULED FOR A THREE DAY FORMAL SCHOOL ON DEVELOPMENT AND IMPLEMENTATION OF HW TRAINING PROGRAMS TO BE CONDUCTED AT NAVAL STATION, NORFOLK DURING THE WEEK ENDING 28 AUG 1987.

F. INTERNAL CAPABILITY TO PROVIDE MINIMAL LEVEL OF CLASSROOM TRAINING FOR HW HANDLERS IS BEING DEVELOPED.

6. TWO SIGNIFICANT ISSUES REMAIN AS FOLLOWS:

A. DURING THE INSPECTION USEPA NOTED THAT CAMP LEJEUNE WAS BURNING AND DETONATING MUNITIONS, A FORM OF HAZARDOUS WASTE DISPOSAL, WITHOUT HAVING OBTAINED A REQUIRED RCRA PEPMIT FOR SUCH DISPOSAL. IF THIS POSITION IS SUSTAINED, IT WOULD HAVE SERIOUS ADVERSE IMPACT. RECOMMEND THAT THIS ISSUE BE ADDRESSED BETWEEN HOMC AND EPA DUE TO CORPS-WIDE IMPLICATIONS. SFE PARAGRAPH 4.J ABOVE. B. DURING THE INSPECTION, EPA REQUESTED COPIES OF ANALYSIS OF CURRENT INVENTORIES OF WASTE DIL AWAITING DISPOSAL THROUGH DRMO. A REPORT IS CURRENTLY BEING PREPARED FOR SUBMITTAL TO EPA. TEST DATA INDICATES THAT HALOGEN CONTENT OF THE MAJORITY OF THE OIL EXCEEDS THE 1000 PART PER MILLION LIMIT (I.E., LEVELS ARE IN 1700-2500 PPM

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ANGE). WHILE ONGOING EFFORTS HAVE REEN MADE TO ELIMINATE DISPOSAL F REGULATED HALOGENATED SOLVENTS INTO WASTE OIL, WE MAY NOT BE ABLE O SUCCESSFULLY REBUTT EPA'S POSITION THAT OUR WASTE OIL IS A EGULATED HW. EPA TOOK THIS POSITION DURING THE INSPECTION, BASED N ANALYSIS OF OIL PREVIOUSLY DISPOSED OF BY CAMP LEJEUNE THROUGH RMD.

M. Cal

COMPANY,

A COPY OF THE COMPLIANCE ORDER IS BEING FORWARDED VIA SEPARATE ORRESPONDENCE TO CODE LFL, ATTN: MR. PAUL HUBBELL.

LVR:CG SIXTH MAB(7)...INFO LVR:NAVDENCLINIC CAMP LEJEUNE NC(4)...INFO LVR:NAVHOSP CAMP LEJEUNE NC(4)...INFO LVR:DRMD CAMP LEJEUNE NC(4)...INFO LVR:HO NUC II MAF(7)...INFO

FAC(2)...DRIG FOR CG MCB CAMP LEJEUNE(117) DICB(1) BCOS(1) BSD7(1) CEDA(1) GSTF(12) SSTF(85) DCDR(14) /13/

-4(1)...INFD FDR CG II MAF(3) CFU(1) S-S(1) / 8/0116

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