FILE FOLDER

DESCRIPTION ON TAB:

2nd LAV. Bn.

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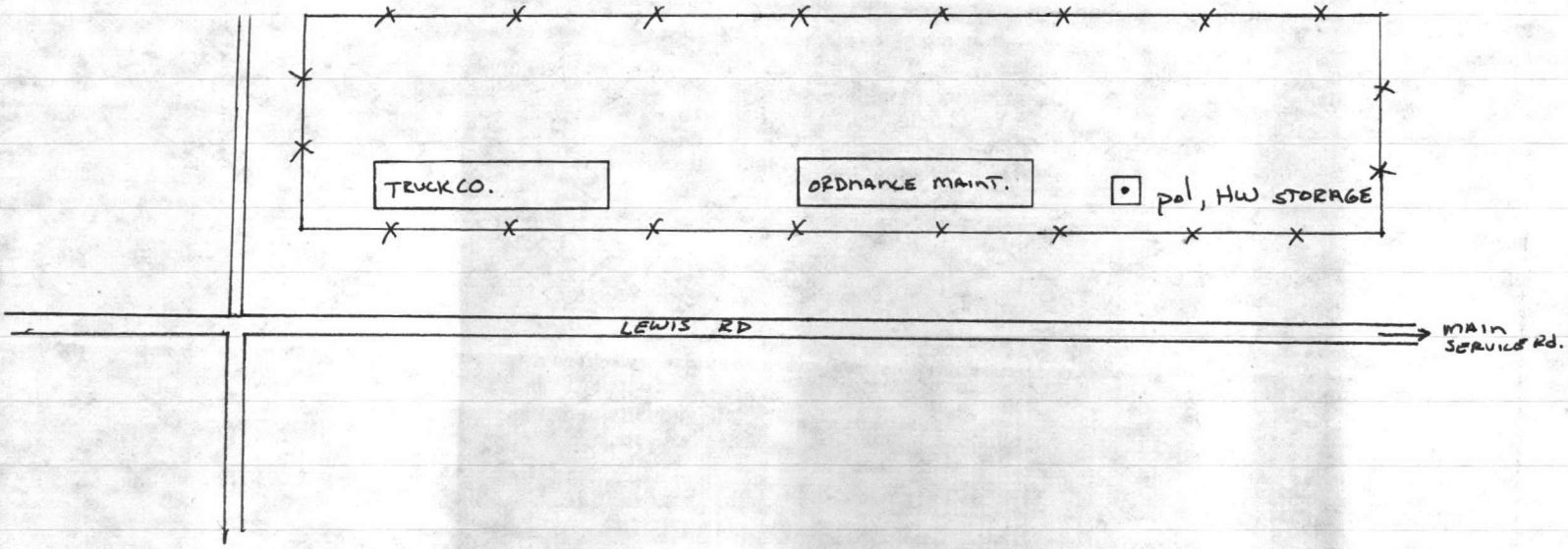
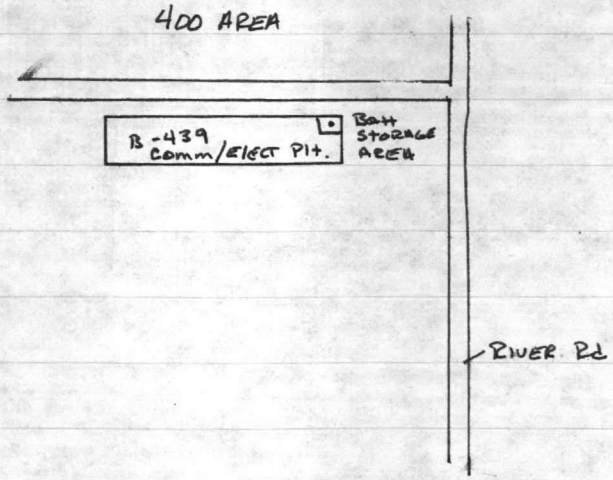
POC's

HMDO Lt. Smith, maint. Officer

Radio Chief SSgt. Wright

Bat. NCO LCpl. Whisnant





LAST INSPECTION

6 FEB 86 NEED TRNG RECORD + INSPECTION RECORDS UPGRADED

Pink NREAD

6240
NREAD
MAR 30 1987

From: Commanding General, Marine Corps Base, Camp Lejeune
To: Commanding General, 2d Marine Division, Camp Lejeune

Subj: HAZARDOUS WASTE MANAGEMENT COMPLIANCE INSPECTION OF 2D LAV BN DTD 9 DEC 86; FOLLOW UP ON

Ref: (a) CG MCB ltr dtd 7 Jan 87
(b) CG MCB 2916252 Oct 86
(c) BO 6240.5A

Encl: (1) Hazardous Waste Management Compliance Re-Inspection Report for 2d LAV BN, 2d MARDIV of 11 Mar 87

1. On 11 March 87, 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 made during the re-inspection, the following comment is provided. All discrepancies cited on previous inspections have been corrected and significant improvements in the Hazardous Waste Program were evident at all sites.

3. Point of contact for this matter is Mr. Danny Sharpe, extenions 2083/1690.

T. J. DALZELL
By direction

ORGANIZATION:

2D Marine Division
2D LAV BN

INSPECTION DATE: 11 Mar 87

INSPECTOR'S NAME Sammy Gwynn

NO.	SPECIFIC LOCATION	DISCREPANCY	REF	RECOMMENDED CORRECTIVE ACTION
1		COMMUNICATION SHOP - BLDG 429		
2		MAINTENANCE SHOP - BLDG 1750		
		MOTOR TRANSPORT - BLDG 1755		

COMMENT: All discrepancies cited on previous compliance inspections have been corrected. For the purpose of this inspection, the above facilities will be considered in compliance with hazardous waste regulations.

ENCLOSURE (1)

HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 11 MAR 87

1. Facility being Inspected: 2d LAUBN / Comm SHOP Bldg #429

2. Organization in Charge: 2d MARDIV

3. Inspection Participants/Phone Number: Sgt Rogers (prim)
LCpl BOCKISH (alt) LCpl CHANDLER. phone #5153

4. Description of HW Streams: Lithium Batteries

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

6. HW Training

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

b. Are training records adequate/current? yes

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

d. Do contacted personnel demonstrate adequate knowledge of:

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

7. Condition of Storage Facilities

a. Date of last Fire Dept Inspection?

b. Are spills likely to reach soil or water? NO

c. Are HW protected from weather? yes

d. Are weekly HW inspections conducted properly? yes

e. Are discrepancies corrected promptly? yes

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 Contents	____
(6) Overfilled	____		

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

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

i. Comments: This facility is in compliance as of this inspection

HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 11 MARCH 87

1. Facility being Inspected: 2d LAV BN Maintenance Shop Bldg 1750

2. Organization in Charge: 2d MAR DIV

3. Inspection Participants/Phone Number: GySgt WILCOX (primary)
LCpl Bassett (alternate) Phone # 1477

4. Description of HW Streams: Dry Cleaning Solvent, Electrolyte

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

6. HW Training

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

b. Are training records adequate/current? yes

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

d. Do contacted personnel demonstrate adequate knowledge of:

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

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? Partially

d. Are weekly HW inspections conducted properly?

e. Are discrepancies corrected promptly? yes

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 Contents	____
(6) Overfilled	____		

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

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

i. Comments: This facility is compliant as of this reinspection.

HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 11 MAR 87

1. Facility being Inspected: 2d LAV BN MOTOR TRANSPORT. Bldg #1755

2. Organization in Charge: 2d MAR DIV

3. Inspection Participants/Phone Number: SSgt La Fountain (primary) CPL Toby (alternate) phone # 3305

4. Description of HW Streams: Dry Cleaning Solvent, Electrolyte + POL

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

6. HW Training

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

b. Are training records adequate/current? yes

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

d. Do contacted personnel demonstrate adequate knowledge of:

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

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? partially

d. Are weekly HW inspections conducted properly? yes

e. Are discrepancies corrected promptly? yes

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 Contents	____
(6) Overfilled	____		

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

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

i. Comments: As of this reinspection this facility is in Compliance

ORGANIZATION:

2d MARDIV
2d LAV BN

INSPECTION DATE: 9 December 1986

INSPECTOR'S NAME Sammy Gwynn

NO.	SPECIFIC LOCATION	DISCREPANCY	REF	RECOMMENDED CORRECTIVE ACTION
1.		MAINTENANCE SHOP		
a.	Bldg. #1755	Failure to establish and maintain training records for all eprsonnel 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. #1755	Failure to post emergency spill response information.	2	Purchase/fabricate and post emergency spill response signs.
c.	Bldg. #1755	Failure to post hazardous waste spill contingency plan.	3	Post spill contingency plan at all hazardous waste sites.
2.		MOTOR TRANSPORT		
a.	Bldg. #1750	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 & alternate to include description of duties & training received for personnel at each site.

ENCLOSURE (4)

ORGANIZATION:

2d MARDIV
2d LAV BN

INSPECTION DATE: 9 December 1986

INSPECTOR'S NAME Sammy Gwynn

NO.	SPECIFIC LOCATION	DISCREPANCY	REF	RECOMMENDED CORRECTIVE ACTION
3.		COMMUNICATIONS SHOP		
a.	Bldg. #429	Failure to establish and maintain training records for all personnel involved in hazardous waste management at each site.	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. #429	Failure to post emergency/spill response information.	2	Purchase/fabricate and post emergency spill response signs.
c.	Bldg. #429	Failure to complete hazardous waste spill contingency plan	3	Complete spill contingency plan with necessary information.

ENCLOSURE (4)

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.

3. 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 relative guidance.

2d MARDIV

AUTHORIZED HW GENERATION AND STORAGE SITES FOR 2d LAV BN

SITE NO. 1 GENERATION/ACCUMULATION	Bldg. 429, Communication Shop LITHIUM BATTERIES
SITE. NO. 2 GENERATION/ACCUMULAITON	Bldg. 1750, Motor Transport SOLVENTS, ELECTROLYTE & WASTE OIL
SITE NO. 3 GENERATION/ACCUMULATION	Bldg. 1755, Maintenance Shop SOLVENTS, ELECTROLYTE & WASTE OIL

HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

Date: 9 Dec 86

1. Facility being Inspected: Bldg 1755

2. Organization in Charge: 2d MARSIO 2D LAV BN

3. Inspection Participants/Phone Number: Lt Gonzalez Phone No 1412, 3305

SSgt Fontaine + [illegible]

4. Description of HW Streams: Solvents, Electrolyte, Waste Oil

5. Are records of HW generation consistent with HW streams? NO

6. HW Training

a. Are job descriptions available for all personnel avtively involved in HW management? NO

b. Are training records adequate/current? NO

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

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

e. Are discrepancies corrected promptly? No

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

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

INSPECTION FORM FOR HAZARDOUS WASTE HANDLING AND STORAGE AREAS

Name of Facility: Bldg 1755 MOTOR TRANSPORT 2d LAV BN
Name/Title OIC: 2Lt GONZALES = SSgt JAUFANTAIN

AREA OF CONCERN Bldg 1750	YES	NO	CORRECTIVE ACTION NEEDED (use back of page to log action taken)
A. CONDITION OF CONTAINERS			
1. Are containers closed			
2. Are containers leaking		✓	
3. Are containers bulging		✓	
4. Are containers collapsed		✓	
5. Are containers corroded		✓	
6. Are containers over-filled		✓	
7. Other problems present			
B. LABELING AND MARKING			
1. Are HW labels in place	✓		
2. Are HW labels filled out	✓		
3. Are hazards (i.e., flammable, corrosive, etc.) labels or markings adequate			
C. Are HWs being disposed of by deadlines	✓		
D. SECURITY AND EMERGENCIES			
1. Is access limited to authorized personnel only			
2. Is emergency response information posted		✓	
3. Supplies and equipment readily available			

DATE: _____

SIGNATURE: _____

ATTACHMENT

e. Corrective Action Recommended:

f. Sketch showing location of Facility:

Bldg [redacted] = 1755 — NO TRNG RECORDS
NO EMERGENCY SIGN

~~1750~~ 1755 — NO CONTINGENCY PLAN

Bldg 1755 — MAINT 2d LAU MAINT
NO TRNG RECORDS
NO CONTINGENCY PLAN

BLDg 1750 — M 2d LAU MTR TRANSPORT
NO TRNG RECORDS

[redacted]

HAZARDOUS WASTE (HW) MANAGEMENT INSPECTION FORM

4 1348 - 0 ttl 20 Oct
Bldg 429 - NO RESPONSE

Date: 9 Dec 86

1. Facility being Inspected: COM Bldg 429

2. Organization in Charge: 2d MARDIV

3. Inspection Participants/Phone Number:

LAN-1750

4. Description of HW Streams:

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

6. HW Training

a. Are job descriptions available for all personnel avtively involved in HW management? NO

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

CONTINGENCY PLAN POSTED BUT NOT FILLED OUT

NO TRNG RECORDS ON HAND

7. Condition of Storage Facilities

a. Date of last Fire Dept Inspection? 10-23-86

b. Are spills likely to reach soil or water? NO

c. Are HW protected from weather? Yes

d. Are weekly HW inspections conducted properly? Yes

e. Are discrepancies corrected promptly? NO

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

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

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

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

i. Comments: _____

INSPECTION FORM FOR HAZARDOUS WASTE HANDLING AND STORAGE AREAS

Name of Facility: COM Bldg 429
Name/Title OIC: Hgsgt Rogers, CPL BOCKISH

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

DATE: 9 Dec 86

SIGNATURE: Sammy D. Rogers

ATTACHMENT

e. Corrective Action Recommended:

f. Sketch showing location of Facility:

Bldg #29 = NO TRNG RECORDS

= HAZARDOUS LABELS NOT IN PLACE ON BATTERIES TO BE TURNED IN

= EMERGENCY PLAN NOT POSTED

HAZARDOUS WASTE MANAGEMENT INSPECTION

1. Organization Inspected: 2nd LAV Bn, 2nd MAR. DIV.

2. Name and title of persons conducting inspection:

   a. NREAD Representative: BECKER

   b. Organizational Commander Representative: Lt. SMITH

   c. Other (Specify) : MGY SGT KAUP
   Cpl Coleman
   SSgt WRIGHT, AC (RADIO CHIEF) LCPL WHISMANT (BAH NCO)

3. Brief Description of HW Activity: GENERATION OF WASTE Solvent at LAV MAINT. GENERATION OF WASTE Lithium BATTS.

4. Summary of Fundings (See Attachment A- B)

   a. Assignment of HW management responsibilities and related personnel training and record keeping: ASSIGNMENT OF HW Mgt Responsibilities HAS BEEN DONE. RECORD KEEPING NEEDS UPGRADING IN Comm. Plt. Lt. Smith NEEDS TRAINING RECORD FOR HIMSELF

   b. Adequacy of HW handling, storage and related internal controls and inspection: GOOD on All ACCOUNTS

INSPECTION FORM FOR HAZARDOUS WASTE HANDLING AND STORAGE AREAS

Name of Facility: LAV MAINT.
Name/Title OIC: Lt Smith

AREA OF CONCERN	YES	NO	CORRECTIVE ACTION NEEDED (use back of page to lo action taken)
A. CONDITION OF CONTAINERS			
1. Are containers closed	✓		
2. Are containers leaking		✓	
3. Are containers bulging		✓	
4. Are containers collapsed		✓	
5. Are containers corroded		✓	
6. Are containers over-filled		✓	
7. Other problems present		✓	
B. LABELING AND MARKING			
1. Are HW labels in place	✓		
2. Are HW labels filled out	✓		
3. Are hazards (i.e., flammable, corrosive, etc.) labels or markings adequate	✓		1. ADD "FLAMMABLE" TO HW DRUM
C. Are HWs being disposed of by deadlines			2. HAVE NOT YET DISPOSED OF A AT THIS TIME
D. SECURITY AND EMERGENCIES			
1. Is access limited to authorized personnel only	✓		
2. Is emergency response information posted	✓		
3. Supplies and equipment readily available	✓		

DATE: 6 FEB 86

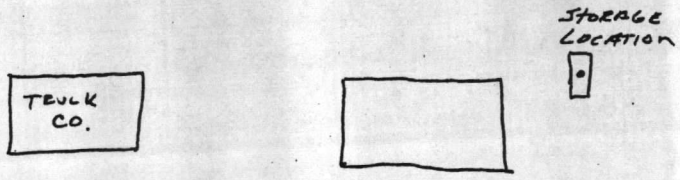
SIGNATURE: Walter B. Smith

ATTACHMENT A

e. Corrective Action Recommended:

1. ADD WORD "FLAMMABLE" TO HW DRUM
2. Fill out Trng. Record on Lt. Smith + his alternate

f. Sketch showing location of Facility:



INSPECTION FOR FOR HAZARDOUS WASTE HANDLING AND STORAGE AREAS

Name of Facility: Comm / Elect Co-Plt.

Name/Title OIC: Lt. Quinn Comm. Officer

AREA OF CONCERN	YES	NO	CORRECTIVE ACTION NEEDED (use back of page to list action taken)
A. CONDITION OF CONTAINERS			
1. Are containers closed	✓		
2. Are containers leaking	X	X	
3. Are containers bulging	X	X	
4. Are containers collapsed	X	X	
5. Are containers corroded		✓	
6. Are containers over-filled	X	X	
7. Other problems present		✓	
B. LABELING AND MARKING	X	X	1. NO DAHS. READY FOR DISPOSAL AT THIS TIME
1. Are HW labels in place	X	X	
2. Are HW labels filled out	X	X	
3. Are hazards (i.e., flammable, corrosive, etc.) labels or markings adequate	✓		
C. Are HWs being disposed of by deadlines	✓		2. HAVE GOOD TURN IN RECORDS + INVENTORY
D. SECURITY AND EMERGENCIES			
1. Is access limited to authorized personnel only	✓		
2. Is emergency response information posted		✓	
3. Supplies and equipment readily available	N/A	N/A	

DATE: 6 FEB 86

SIGNATURE: [illegible] SSGT

ATTACHMENT B

e. Corrective Action Recommended:

1. POST SIGN ON DOOR FOR EMERGENCY RESPONSE
2. TRNG RECORDS NEED TO BE MAINTAINED
3. INSPECTION RECORDS NEED TO BE MAINTAINED

f. Sketch showing location of Facility: