



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET
ATLANTA, GEORGIA 30365

JUL 28 1989

4WD-RCRA

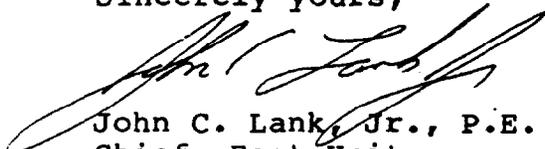
Mr. J.J. Carroll
Chief of Staff, Facilities
United States Marine Corps
Marine Corps Base
Camp Lejeune

Dear Mr. Carroll:

On June 27 and 28, 1989 the U.S. Environmental Protection Agency (USEPA) conducted an inspection at USMC Camp Lejeune located near Jacksonville, North Carolina. Please find the enclosed report which gives detailed observations noted from the inspection. The State of North Carolina has been notified that there are violations of the North Carolina Hazardous Waste Management Rules at USMC Camp Lejeune. The State of North Carolina has the lead in enforcement for federal facilities located in North Carolina, and therefore the State will be responsible for any enforcement action for USMC Camp Lejeune, with the exception of violations identified under 40 CFR 268.8 which will be addressed by the U.S. EPA.

If you have any questions, please contact Mr. Glenn May of my staff at (404)347-7603.

Sincerely yours,


John C. Lank, Jr., P.E.
Chief, East Unit
Waste Compliance Section

Enclosure

cc: Jerry Rhodes, North Carolina SHWMB
Doug Holyfield, North Carolina SHWMB
Jerry Parks, North Carolina SHWMB, Eastern Region

RCRA SITE INSPECTION1. INSPECTOR AND AUTHOR OF REPORT

Glenn A. May
Environmental Engineer

2. FACILITY INFORMATION

U.S. Marine Corps Camp Lejuene (USMC)
NC Highway 24 & U.S. Highway 17
Camp Lejuene, North Carolina 28542
NC6 170 022 580

3. RESPONSIBLE OFFICIAL

Danny Sharpe
Head of Soil, Water and Environmental Branch
(919) 451-2083

4. INSPECTION PARTICIPANTS

Glenn May, U.S. EPA
Jerry Parks, North Carolina SHWMB
Danny Sharpe, USMC Camp Lejuene NREAD
John Riggs, USMC Camp Lejuene, NREAD
Capt. Henkle, USMC Camp Lejuene, SJA

5. DATE AND TIME OF INSPECTION

June 27 and 28, 1989
8:00 a.m.

6. APPLICABLE REGULATIONS

RCRA Section 3007
40 CFR Parts 262, 263, 264, 265, and 268

7. PURPOSE OF SURVEY

The Hazardous and Solid Waste Amendments of 1984 require an annual inspection of all federal facilities that treat, store or dispose of hazardous waste. This inspection is to determine the USMC's compliance status with the permit conditions, generator standards and transporter standards.

8. FACILITY DESCRIPTION

The USMC base is located in Jacksonville, North Carolina. The base is the most complete amphibious training base in the world. The main mission of the base is to provide

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housing, training, logistic and administrative support for marine units, conduct specialized schools and other training as needed, receive and process personnel as assigned, and conduct combat training as needed. The facility was issued a hazardous waste Part B permit for storage in containers on September 7, 1984.

9. FINDINGS

On June 27 and 28, 1989, EPA conducted an inspection of Camp Lejeune as a permitted facility for storage in containers, a generator of hazardous waste and a transporter of hazardous waste.

The permitted facility is operated by the Defense Reutilization Marketing Office (DRMO). DRMO is responsible for the management of hazardous waste. The USMC is the owner of the facility, who oversees the management of hazardous waste under the Natural Resource and Environmental Affairs Division. The Traffic Manager Officer (TMO) is responsible for the transportation of hazardous waste. Hazardous waste is generated at over 100 sites and then transported by TMO to the permitted storage area.

The permitted storage area has two areas for the storage of hazardous waste, building TP-451 and TP-463. The capacity in 55 gallon drums of the storage areas are: 224 drums in TP-451 and 504 drums in TP-463. Hazardous materials are also stored in these two buildings.

The following generating sites were inspected: (B=building number) Base Maintenance B1202, 2D Maint Battalion, sites B901 and B902; Headquarters Dattalion B-307; 8th Engineering Special Battalion, FC-200; 10th Marine Division b-1789 and 1775; Naval Hospital B-118.

The USMC generates a large quantity of batteries (lead-acid lithium and magnesium). The lead-acid batteries are recycled and the acid may be occasionally drained, if the battery is cracked. The lithium and magnesium batteries are not recyclable and are disposed as a waste.

Safety-Kleen currently services approximately 100 sites where hazardous waste is generated. TMO is responsible for signing the manifest as the generator at the various locations. The USMC is currently considering the possibility of Safety-Kleen servicing an addition locations.

TMO is responsible for transporting all waste from the generating sites to be the permitted storage buildings. The USMC is also a transporter of hazardous waste, and TMO is

responsible for transporting the waste. TMO transports hazardous waste from the USMC Air Station - New River Base, Camp Geiger and Camp Johnson to the Camp Lejeune permitted storage buildings. Only the USMC New River Base is required to have a separate EPA I.D. number.

The USMC generates a large quantity of waste oil. The waste oil is accumulated at each generating site. Previously, the generated waste oil was transported to one of four areas for storage before transportation to a burner. The capacity at the four storage areas is as follows:

Building 45 - 273,370 gallon tank
Holcomb Building - 3 tank 17,585 gallons each,
1 tank 30,000 gallons
Tarawa Terrace - 6 tanks 30,000 gallons each

The following tanks are currently considered hazardous waste storage tanks: S781 at Building 45; S889 and S891 at Holcomb Blvd.; STT61, STT62, STT63, STT64 and STT65 at Tarawa Terrace. Closure plans were submitted to the North Carolina Solid and Hazardous Waste Management Branch for approval on June 7, 1988. The tanks will be closed upon approval.

All waste oil from New River Base is presently being disposed off-site after accumulation at appropriate hazardous waste handling facilities. Waste oil generated at Camp Lejuene is not mixed with the waste oil from New River Base and is stored in tanks S889 and S891. Both tanks were emptied and steamed cleaned before the introduction of the non-hazardous waste oil. The hazardous waste oil was disposed off-site properly. The rinsate from the steam cleaning is held in Tank 45. The non-hazardous waste oil held in S889 and S891 is being sent to a burner upon analysis showing no chlorinated organics. The storage of the waste oil in Tanks S889 and S891 was approved by North Carolina SHWMB by letter dated July 27, 1988. No other hazardous waste tanks are presenting receiving waste.

The USMC performs the open burning and detonation of waste explosives at two locations. The USMC has submitted a Part B for this activity.

Marine Base Lot 203 was viewed by the inspectors from outside the fenced area. The site has been prohibited from entry by all personnel unless in Level C safety equipment. Lot 203 is the site where drums, labeled as DDT, were found buried by facility personnel after a forklift ran over one of the drums. The time of disposal is unknown. At least

five drums of waste have been exposed to the surface. The USMC is in the process of obtaining a small business contract to remove the exposed drums and contaminated soils. Further investigations will be conducted in the future.

Attached is a copy of the inspection checklist. The following violations were identified at the inspections on September 28 and 29, 1988 and have not been corrected, in addition they are violations of the State Compliance Order, dated February 6, 1989:

40 CFR 262.34(a) - A generator of hazardous waste shall not accumulate hazardous waste on-site for more than 90 days in an area that is not permitted or have interim status for storage. One drum of D003/D008 hazardous waste designated with an accumulation start date of December 29, 1989, has been in at B-1775 longer than 90 days. One drum of hazardous waste from Base Maintenance was received at Building TP-463 on June 27, 1989, with an accumulation start date of March 15, 1989; thus the waste was stored longer than ninety days at a non-permitted storage area.

40 CFR 262.34(a)(1) - A generator of hazardous waste, who accumulates waste for less than 90 days must comply with 40 CFR 265 Subpart I. A) A generator must inspect areas where containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. A log of inspections shall be kept for at least three years from the date of the inspection, as required by 40 CFR 265.174. No weekly inspection logs were present at Building 1775 for the weeks from April 28, 1989 until June 28, 1989, except for June 9 and May 5, 1989.

40 CFR 262.34(a)(3) - A generator of hazardous waste, who accumulates waste on-site for less than 90 days must label or mark clearly each container with the words, "Hazardous Waste." One drum of hazardous waste, paint wastes, was not labeled with the words, "Hazardous Waste" at FC-200.

40 CFR 262.34(a)(4) - For a generator of hazardous waste the facility must comply with the requirements of 40 CFR 265.16, for personnel training.

40 CFR 265.16(d)(3) - A written description of the type and amount of both introductory and continuing training that will be given must be documented.

40 CFR 265.16(d)(4) - The owner or operator must maintain documents and records at the facility which record that the training or job experience of this section has been given to and completed by facility personnel.

Personnel at B-1775 failed to demonstrate compliance with personnel training requirements.

In addition to the above violations that have not been corrected, the following violations were identified.

Permit Condition - Part II. During the inspection of Building TP-463, a drum of U359, U070 and U072 hazardous waste was found being stored. The permit does not allow storage of these wastes. Furthermore, during the manifest review, U154, U117, U151 were discovered to have been manifested from the storage area. These wastes are not identified for storage in the permit.

Permit Condition - Part II.D. The facility's permit has not been revised for its waste analysis plan to include land ban considerations as required by 40 CFR 270.4 and 264.13(a)(1).

Permit Condition - Part II.F. Inspections logs for November 10, 1989 and October 14, 1988, did not record the time of the inspection.

Permit Condition - Part II.M. Manifest number 0911 does not have a five digit code as required by 40 CFR 264.71(c)).

Permit Condition - Part III. One drum (30 gallons) of hazardous waste was not on a pallet while in storage building TP-451.

Permit Condition - Part III.C. One overpack pine box (container) containing four cans of paint waste in kitty litter was partially open violating the permit condition to keep all containers closed.

40 CFR 262.11 Three drums of waste at B-1775 have not been analysis to determine if they contained hazardous waste.

40 CFR 262.34(a) - A generator may not accumulate hazardous waste for over 90 days in an area which does not have a permit or interim status for storage. Building FC-251 was storing hazardous waste longer than 90 days.

40 CFR 262.34 (a)(2) One drum of hazardous waste at B-1780 and one drum of hazardous waste at B-1775 were not marked clearly with the date upon which each period of accumulation began.

40 CFR 268.7(a)(1) - A generator who ships hazardous waste which exceeds applicable treatment standards must notify the treatment facility with each shipment in writing of the appropriate treatment standard. Manifest number 0911, dated March 18, 1989, shipped waste F002 off-site without a land ban notification as required.

40 CFR 268.8. - Camp Lejeune failed to submitted a "soft hammer" certification/demonstration before off-site shipment of U154 on June 7, 1989.

In addition to the above violations identified, the following recommendations are made. 1) Segregate hazardous waste from hazardous materials including the lithium batteries from magnesium batteries. 2) Keep the overpacked pine boxes containing lithium batteries completely closed and stacked only two high. 3) Modify the permit to include any additional hazardous wastes the facility may need to store. 4) Place personnel decontamination equipment (e.i. eye washes and emergency showers) closer to the accumulation areas.

10. CONCLUSION

The USMC has a complex situation at the generating sites with training personnel, management of waste generated and maintaining paper work. The base has made a vast improvement over the last year to improve the condition of the hazardous waste accumulation areas. The base still needs to concentrate on the accumulation areas because many of the violations sited in this inspection report are associated with the areas.

USMC has improved on housekeeping skills from the previous EPA inspection. Many generation and accumulation sites have been consolidated to reduce number of handlers. Containment of these areas will decrease environmental impact and time spent to clean up spills.

USMC has begun to emphasize an impressive waste minimization program. The increase in emphasis in this area will result in decreased expenditures on hazardous waste management and disposal and a decrease in time spent in handling waste. Also the sites ability to remain in compliance with hazardous waste regulations should be increase with an emphasis on waste minimization.

11. RECOMMENDATIONS

Transmit a copy of the USMC Camp Lejuene inspection report to North Carolina SHWMB for appropriate enforcement in accordance to the State's enforcement response policy.

12. SIGNED

Glenn May
Glenn May
Environmental Engineer

7/12/89
Date

13. CONCURRENCE

APPROVAL

John C. Lank
John C. Lank, Chief
East Unit, WCS

7/12/89
Date

Allan E. Antley
Allan E. Antley, Chief
Waste Compliance Section

7/18/89
Date

GENERATOR INSPECTION FORM - PART 262

Name of Site USMC Camp Lejeune EPA I.D. NAU170425-0 County _____
 Location He NC Inspection Date 07/28/89 Signature of Inspector(s) [Signature]
 Compliance Date _____ Signature of Facility Contact _____

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

- 1. Hazardous Waste Determination (262.11)
 - Subpart D waste (b)
 - Subpart C waste (c)(1)(2)

- 2. EPA Identification Numbers
 - EPA generator number (a)
 - EPA transporter/facility (c)

SUBPART B - THE MANIFEST

- 3. General Requirements (262.20)
 - proper manifest (a)
 - permitted facility (b)

- 4. Required Information (262.21)
 - document number (a)(1)
 - generator identification (a)(2)
 - transporter identification (a)(3)
 - facility identification (a)(4)
 - D.O.T. description (a)(5)
 - total quantity (a)(6)
 - certification (b)

- 5. Number of Copies (262.22)
 - minimum number

- 6. Use of the Manifest (262.23)
 - generator handwritten signature (a)(1)
 - transporter signature/date (a)(2)
 - retain copy (a)(3)
 - copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

- 7. Packaging (262.30)
 - D.O.T. compliance
- 8. Labeling (262.31)
 - D.O.T. compliance
- 9. Marking (262.32)
 - D.O.T. compliance (a)
 - "HAZARDOUS WASTE" label (b)

- 10. Placarding (262.33)
 - D.O.T. compliance

- 11. Accumulation Time (262.34)
 - Subpart I; J (a)(1)
 - accumulation date (a)(2)
 - "Hazardous Waste" (a)(3)
 - Subpart C; D (a)(4)*
 - personnel training (a)(4)*

*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

- 12. Recordkeeping (262.40)
 - manifest retention (a)
 - annual/exception report (b)
 - test/waste analysis (c)

Name of Site: 1061700 23574 EPA I.D. _____
 Location: Tulahoma, NC Inspection Date: 6/27-28/89 Signature of Inspector: _____
 Compliance Date: _____ Signature of Facility Cont: _____

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART B - GENERAL FACILITY STANDARDS

SUBPART C - PREPAREDNESS AND PREVENTION

1. Required Notices (264.12)

- foreign shipments (a)
- off-site notification (b)
- new owner/operator (c)

2. General Waste Analysis (264.13)

- chemical/physical lab reports (a)(1)
- review/repeat of analysis (a)(3)(4)
- inspect/analyze (a)(4)
- analysis plan (b)(c)

Needs modification for land ban

3. Security (264.14)

(The facility may be exempt under (a)(1)(2)

- 24-hour surveillance system (b)(1)
- or
- artificial/natural barrier (b)(2)(i)
- and
- entry control (b)(2)(ii)
- danger sign(s) (c)

4. General Inspection Requirements (264.15)

- inspect for malfunctions, operator errors, discharges, etc. (a)(1)(2)
- inspect monitoring, safety and emergency equipment, etc. (b)(1)
- written schedule (b)(2)(3)
- remedial action (c)
- inspection log (d)

Re time delay on Nov. 10 and Oct 14.

5. Personnel Training (264.16)

- program completed (a)(1)(b)
- annual review (c)
- documents/records (d)(e)

6. General Requirements for Ignitable, Reactive or Incompatible Waste (264.17)

- proper handling/"No Smoking" signs (a)(b)
- documentation (c)

8. Required Equipment (264.32)

- communication/alarm system (a)
- telephone or two-way radio (b)
- fire, spill, and decontamination equipment (c)
- adequate pressure and volume of water/foam equipment (d)

9. Testing and Maintenance of Equipment (264.33)

- as required

10. Access to Communications or Alarm System (264.34)

- immediate (a)(b)

11. Required Aisle Space (264.35)

- per permit condition

12. Arrangement with Local Authorities (264.37)

- of changes with wastes characteristics (a)
- documentation of refusal (b)

SUBPART D - CONTINGENCY PLAN AND EMERGENCY PROCEDURES

13. Amendment of Contingency Plan (264.54)

- permit revision (a)
- emergency failure (b)
- facility design change (i.e. construction operation) (c)
- coordinators change (d)
- equipment change (e)

14. Emergency Coordinator (264.55)

- on call
- authority to commit

- 15. Emergency Procedures (264.56)
 - activation of alarm sys. (a)(1)
 - notification to State/Local agencies of discharge (a)(2), (d)(1)(2)
 - hazard assessment (c)
 - reasonable prevention measures (e)
 - monitor for leaks, pressure buildup, etc. (f)
 - proper management of recovered waste, contaminated soil or surface water (g)
 - compatibility with contaminated areas (h)(1)
 - emergency equipment cleaned (h)(2)
 - notification of compliance (i)
 - written report (15 days)/operating record notation (j)

SUBPART E - MANIFEST SYSTEM, RECORDKEEPING

- 16. Use of Manifest System (264.71)
 - sign, date (a)(1)
 - note discrepancies (a)(2)
 - copy to transporter (a)(3)
 - copy to generator (30 days) (a)(4)
 - TSDF copy (a)(5)
 - rail or water transporter (b)(1)(2)(3)(4)(5)
 - generator compliance (c)

Not Green Manifest 09/11, 3/10/89

- 17. Manifest Discrepancies (264.72)
 - bulk discrepancies (a)(1)
 - batch discrepancies (a)(2)
 - written report, if required (b)

- 18. Operating Record (264.73)
 - written (a)
 - quantity, handling methods, dates (b)(1)
 - location/quantity with cross reference (b)(2)
 - waste analysis (b)(3)
 - incident reports (b)(4)
 - inspection record (b)(5)
 - monitoring, testing results (for incinerators) (b)(6)
 - notice to generators (b)(7)
 - closure/post closure cost (b)(8)

- 19. Availability, Retention, and Disposition of Records (264.74)
 - access to records (a)
 - retention (b)
 - records submitted (c)

- 20. Annual Report (264.75)
 - submit by March 1 (a)(b)(c)(d)(e)(f)(g)(h)

- 21. Unmanifested Waste Report (264.76)
 - within 15 days (a)(b)(c)(d)(e)(f)(g)

- 22. Additional Reports (264.77)
 - Section 264.56(j) report (a)
 - facility closure (c)

SUBPART G - CLOSURE AND POST-CLOSURE

- 23. Closure Plan; Amendment of Plan (264.112)
 - written (a)
 - inventory modification (a)(2)
 - amendment (b)
 - 180 day notice (c)

- 24. Disposal or Decontamination of Equipment (264.113)
 - equipment disposal/decontamination

- 25. Post-Closure Plan; Amendment of Plan (264.118)
 - written (a)
 - amendment/modification (b)(c)

SUBPART H - FINANCIAL REQUIREMENTS

- 26. Cost Estimate for Closure (264.142)
 - written (a)
 - anniversary adjustment (b)
 - change adjustment (c)
 - available for inspection (d)

- 27. Financial Assurance for Closure (264.143)
 - yes;
 - Specify form _____

- 28. Estimate for Post-Closure Care (264.144)
 - written (a)
 - anniversary adjustment (b)
 - change adjustment (c)
 - available for inspection (d)

- 29. Financial Assurance for Post-Closure (264.145)
 - yes;
 - Specify form _____

- 30. Liability Requirements (264.147)
 - sudden occurrences (a)
 - non-sudden occurrences (b)

- 31. Incapacity of Owners or Operators, Guarantors or Financial Institutions (264.148)
 - compliance (a)(b)

TSDF INSPECTION FORM - PART 264
SUPPLEMENTAL CHECKLIST FOR FACILITY - SPECIFIC CONDITIONS

US MARINE CORPS, CAMP LEJEUNE
Camp Lejeune

NC6170022580
Onslow County

1. Authorized Waste (Permit Condition II.A):

- Storage in 55-gallon containers of waste codes
 - D001
 - D002
 - D003
 - D007
 - D008
 - D009
 - D011
 - F001
 - F002
 - F003
 - F005
 - U002
 - U061
 - U076
 - U080
 - U122
 - U129
 - U142
 - U151
 - U159
 - U188
 - U210
 - U220
 - U226
 - U228
 - U239

Also found were U357, U670 and U072.

2. Storage in Containers (Permit, Part II):

- Building TP-451: No more than 224 55-gallon containers
- Building TC-863: No more than 504 55-gallon containers
- Containers stacked no more than two (2) high
- Minimum 4 feet aisle space between double rows (Permit Condition III.E) *Except for bottom letting overpack pine boxes*
- Minimum 1 foot space between outside rows and walls (Permit Condition III.E)
- Minimum 5 feet access area along curbs and/or trenches (Permit Condition III.E)

CONTAINER/TANK INSPECTION FORM - PART 265

Camp Lejeune
 Name of Site

NC:1700225EC
 EPA I.D.

6/27/89
 Inspection Date

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

SUBPART J - TANKS

- 1. Condition Of Containers (265.171)
 - leakage
 - past leakage (evidence)
 - severe rusting
 - structural defect
- 2. Compatibility Of Waste With Containers (265.172)
 - visual evidence of noncompliance (leakage, corrosion)
- 3. Management of Containers (265.173)
 - closed (a)
 - improper handling or storage (b)
- 4. Inspections (265.174)
 - weekly (minimum) *no time on inspection logs*
- 5. Special Requirements For Ignitable or Reactive Waste (265.176)
 - 15m (50 ft)
- 6. Special Requirements For Incompatible Waste (265.177)
 - mixing (a)
 - unwashed container (b)
 - separation (c)

- 1. General Operating Requirements (265.192)
 - compatibility (a)(b)
 - uncovered tank precautions (c)
 - overflow prevention (d)
- 2. Waste Analysis and Trial Tests (265.193)*
 - *Section not applicable to a generator only
 - waste analysis/trial test
- 3. Inspections (265.194)
 - discharge control equipment (a)(1)
 - monitoring equipment (a)(2)
 - waste level (a)(3)
 - construction material (a)(4)
 - surrounding area (a)(5)
 - assessment schedule/procedures (b)
- 4. Closure (265.197)
 - plan on-site
- 5. Special Requirements For Ignitable Or Reactive Waste (265.198)
 - properly stored (a)(1)(2)(3)
 - buffer requirements (b)
- 6. Special Requirements For Incompatible Wastes (265.199)
 - properly stored (a)
 - tank washed (b)

REMARKS: _____

