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JAN 23 1981

From: Base Maintenance Officer
To: Assistant Chief of Staff, Facilities

Subj: Hazardous Material Environmental Management Program

Encl: (1) Agreement between Marine Corps Base, Camp Lejeune and Marine
Corps Air Station (H), New River for Implementation of Hazardous
Material Environmental Management Program
(2) AC/S FAC memo of 31 Dec 1980
(3) CMC ltr LFF-2:PHC:yum of 6 Nov 1980

1. Enclosure (1) has been prepared, as requested by enclosure (2).
Enclosure (1) incorporated Headquarters Marine Corps guidance provided in
enclosure (3).

2. Point of contact in this matter is Mr. Julian Wooten, Base Maintenance
Department, telephone 5003.

F. H. MOUNT

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AGREEMENT BETWEEN MARINE CORPS BASE, CAMP LEJEUNE AND MARINE CORPS AIR STATION (H), NEW RIVER FOR IMPLEMENTATION OF HAZARDOUS MATERIAL ENVIRONMENTAL MANAGEMENT PROGRAM

MARINE CORPS BASE WILL:

1. Designate an activity focal point regarding hazardous material and waste management and disposal.

2. Register with the Environmental Protection Agency and North Carolina (EPA & NC) as a long term storer and transporter of all hazardous wastes generated by MCAS(H), New River, which are subject to the Resource Conservation and Recovery Act (RCRA). Obtain all permits required by EPA and NC for storage of hazardous wastes.

3. Provide guidance/material support (including laboratory analytical assistance) to ensure proper short term (less than ninety days) storage, packaging and labeling of hazardous wastes.

4. Include MCAS(H), New River in an area-wide oil/hazardous material spill contingency plan. Furnish material support required and a basic level of personnel and equipment to handle routine spills. Make required reports to regulatory agencies and OMC.

5. Provide long term (more than ninety days) storage and final disposal of all hazardous wastes generated by MCAS(H), New River subject to RCRA, provided the wastes are properly packaged and documented. Maintain appropriate records of long term storage and disposal of hazardous wastes accepted from MCAS(H), New River and submit all related reports required of hazardous waste storers and transporters to EPA and NC. Provide technical assistance to MCAS(H), New River on record-keeping and reporting.

MARINE CORPS AIR STATION (H) WILL:

Designate an activity focal point regarding hazardous material and waste management and disposal.

Register with EPA and NC as a hazardous waste generator.

Ensure that hazardous wastes are properly identified, packaged, labeled and certified. Provide short-term storage (less than ninety days) when required.

Assist, as required, in implementing an area-wide oil/hazardous material spill contingency plan, including but not limited to furnishing manpower requested by on-scene coordinator for spill containment and cleanup at MCAS(H), New River. Conduct investigations of spills and submit appropriate reports thereof to base.

Prepare all documents required to transport and deliver wastes to long term storage and disposal. Maintain appropriate records of waste generation and shipments and submit all reports required of hazardous waste generators to the EPA and NC.

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MARINE CORPS BASE WILL:

6. Provide technical assistance and environmental protection support to MCAS(H), New River regarding spill prevention control and countermeasure plan (SPCC) and hazardous material disposal.

MARINE CORPS AIR STATION (H), NEW RIVER WILL:

Develop and implement an SPCC plan for hazardous waste generation and hazardous material and waste storage sites MCAS(H), New River.

(Signature) _____ (Date) _____

Commanding General
Marine Corps Base
Camp Lejeune, North Carolina 28542

(Signature) _____ (Date) _____

Commanding Officer
Marine Corps Air Station (H), New River
Jacksonville, North Carolina 28540

THIS AGREEMENT WILL REMAIN IN EFFECT UNTIL INCORPORATED INTO THE MARINE CORPS AIR BASES EAST/
MARINE CORPS BASE, CAMP LEJEUNE LOGISTIC/SUPPORT SERVICES AGREEMENT FOR MARINE CORPS BASE
CAMP LEJEUNE/MARINE CORPS AIR STATION (H), NEW RIVER.

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DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
WASHINGTON, D.C. 20380

IN REPLY REFER TO

LFF-2:PCH:yum

6 NOV 1980

From: Commandant of the Marine Corps
To: Commanding General, Marine Corps Base,
Camp Lejeune NC 28586

Subj: Marine Corps Compliance with Hazardous Waste Regulations

Ref: (a) MCO P11000.8A
(b) COMCABEAST/MCB Camp Lejeune Logistic Support Service
Agreement Revision No. 1 of March 1977
(c) 40 CFR Parts 260 to 265 and 122 to 124 of
19 May 1980
(d) MCBul 6280 of 1 Oct 1980

Encl: (1) Recommended Content for a Memorandum of Under-
standing Regarding Non-contiguous Activity Require-
ments for Compliance with Hazardous Waste Manage-
ment Regulations

1. Reference (a) establishes policy and implements a program for protection of the environment within the Marine Corps. The Order recommends designation of single responsibility for the management of natural resources and environmental affairs for MCB Camp Lejeune and MCAS(H) New River. This was accomplished within a Logistic Support Service Agreement between the two facilities, most recently updated by reference (b). A national program to ensure proper handling and disposal of hazardous wastes was established by reference (c). The unique notification and reporting requirements associated with these regulations create ambiguity regarding the responsibilities of MCB Camp Lejeune and MCAS(H) New River as set forth in references (a) and (b). This letter provides guidance to ensure full compliance with the Resource Conservation and Recovery Act (RCRA) implementing regulations while maintaining the MCB Camp Lejeune service support role to the maximum extent practicable. It is recommended that the guidance provided herein be incorporated into the next update of reference (b).

2. The RCRA program provides a cradle-to-grave (generation to ultimate disposal) approach for the management of hazardous wastes. Administrative procedures associated with these regulations include certain notification, permitting and annual reporting requirements which must be met within specific time frames by generators, transporters, storers, processors, and disposers of hazardous wastes. Normally, these requirements would be the responsibility of MCB Camp Lejeune. The implementing regulations require, however, that activities physically separated by public access roads, who generate hazardous wastes in excess of the

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ENCLOSURE (3)

6 NOV 1980

Subj: Marine Corps Compliance with Hazardous Waste Regulations

quantities established in the implementing regulations, file separately a "Notification of Hazardous Waste Activity" form and comply with other administrative requirements, regardless of the internal management system established for handling hazardous wastes.

3. Reference (a) directs Marine Corps activities to comply with the spirit as well as the letter of all Federal environmental laws. This policy is extended to State and local environmental requirements by reference (d). (RCRA provides for state implementation of this program when consistency requirements are met). In order to comply with the RCRA implementing regulations, MCB Camp Lejeune and MCAS(H) New River will ensure that the administrative procedures required under these regulations are met. To accomplish this, it is suggested that a Memorandum of Understanding (MOU) be established between the two Commands, delineating each activity's responsibilities for implementation of the hazardous waste management regulations. The recommended content of such a MOU, that minimizes the administrative requirements of MCAS(H) New River, is provided as the enclosure. It must be emphasized that while the designated single point of responsibility for environmental matters (i.e. MCB Camp Lejeune) can provide technical and administrative assistance to non-contiguous facilities generating quantities of hazardous wastes in excess of that specified in the regulations, the RCRA regulations require that the ultimate responsibility for proper management of hazardous wastes still rests with the non-contiguous activity (i.e. MCAS(H) New River).

4. Clarification of the special circumstances created by these regulations will be included in the next update to reference (a). Questions regarding this matter should be directed to Mr. Paul Hubbell, the Headquarters Marine Corps point of contact for implementation of the hazardous materials environmental management program. Mr. Hubbell can be reached on Autovon 224-1425/2171.



Frank E. PETERSEN
By direction

Copy to:
COMCABEAST
MCAS(H) NEW RIVER

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Recommended Content for a Memorandum of Understanding Regarding Non-contiguous Activity Requirements for Compliance with Hazardous Waste Management Regulations

MCB Camp Lejeune/MCAS(H) New River responsibilities in a support service agreement for compliance with RCRA implementing regulations should include the following:

MCB Camp Lejeune shall:

- ✓ 1. Designate an activity focal point regarding hazardous wastes.
- ~~done~~ ✓ 2. Assist MCAS(H) New River in preparation of EPA "Notification of Hazardous Waste Activity" form.
- ✓ 3. Provide guidance/material support to ensure proper short term (less than ninety days) storage of generated hazardous wastes at MCAS(H) New River.
- ✓ 4. Accept MCAS(H) New River generated hazardous wastes that have been properly packaged and documented.
- ✓ 5. Complete storage/processing/and disposal actions for MCAS(H) New River generated hazardous wastes.
- ✓ 6. Maintain sufficient records regarding transport/storage/processing/and disposal of MCAS(H) New River generated hazardous wastes.
- ✓ 7. Provide guidance as required regarding preparation and submission of annual hazardous waste reports.
- ✓ 8. Provide technical assistance and environmental protection support to MCAS(H) New River regarding Spill Prevention Control and Countermeasures (SPCC) Plan and Hazardous Waste Management Plan development and implementation.
- ✓ 9. Include MCAS(H) New River in an area-wide Oil/Hazardous Material spill contingency plan.

MCAS(H) New River shall:

- ✓ 1. Designate an activity focal point regarding hazardous wastes.
- ~~done~~ ✓ 2. Prepare and forward (with MCB Camp Lejeune support) the EPA "Notification of Hazardous Waste Activity" form.
- ✓ 3. Properly package and provide short term (less than ninety days) storage for hazardous wastes generated.
- ✓ 4. Deliver hazardous wastes, properly packaged and documented, to MCB Camp Lejeune ultimate disposal action.

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Enclosure (1)

- ✓ 5. Provide required manifest documentation and maintain appropriate records of such shipments.
- ✓ 6. Prepare (with MCB Camp Lejeune assistance), sign, and forward annual hazardous waste management reports required by EPA.
- ✓ 7. Implement and enforce a Spill Prevention, Control, and Countermeasures Plan and the Hazardous Waste Management Plan.
- ✓ 8. Assist, as required, in implementing an area-wide Oil/Hazardous Material spill contingency plan.

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