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MCBul 6280
LFF-2-ncs
11 Dec 1980

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MARINE CORPS BULLETIN 6280

From: Commandant of the Marine Corps
To: Distribution List

Subj: Past Hazardous Waste Disposal Sites--Preliminary Survey for the Navy Assessment and Control of Installation Pollutants Program

Ref: (a) MCBul 6280 of 1 May 1980

Encl: (1) Marine Corps Activity Disposal Site Fact Form

Report Required: Activity Disposal Site Fact Form (Report Symbol DN-6280-02), par. 3

1. Purpose. To provide additional guidance regarding the Navy Assessment and Control of Installation Pollutants (NACIP) Program, to advise addressees of their selection after an initial screening process as the initial Marine Corps activities reviewed under this program, and to request data to be used for prioritizing the onsite review by the NACIP team.

2. Discussion

a. National concern regarding hazardous wastes (HW's) has been expressed in two areas: the continuing disposal of day-to-day generated HW's and the past environmental effects of buried or dumped HW's. The reference established the Marine Corps program in accordance with recently promulgated Environmental Protection Agency (EPA) regulations on the day-to-day handling and disposal of HW's. A program at Marine Corps activities for the assessment of past disposal practices will be largely accomplished by the Naval Facilities Engineering Command (NAVFACENGCOM) under the direction of the Chief of Naval Material.

b. This Bulletin is forwarded to initiate the study for the selection of the first Marine Corps activities to be reviewed (receive the initial assessment study) under the NACIP Program. To establish the sequence in which the overall Department of Navy assessments will be conducted, a "fact form" has been developed and is provided as the enclosure.

3. Action. Addressees shall take necessary action to have the enclosed form completed by those personnel most knowledgeable about the past disposal practices at the facility. Completed forms shall be forwarded to the Commandant of the Marine Corps (Code LFF) by 30 January 1981, with copies provided to the cognizant NAVFACENGCOM field division and the Naval Energy and Environmental Support Activity, Port Hueneme, California 93043. Addressees will be contacted regarding coordination for the onsite review. Report Symbol DN-6280-02 is assigned to this report.

MCBul 6280
11 Dec 1980

MARINE CORPS ACTIVITY DISPOSAL SITE FACT FORM
(Report Symbol MC-6280-02)

1. A Marine Corps bulletin in the 6280 series describes the Marine Corps program to assess and control environmental effects of abandoned HW disposal/dump sites at Marine Corps activities. The program will be accomplished chiefly by the NAVFACENCOM under the direction of the Chief of Naval Material; however, support is required from Marine Corps activities.

2. This fact form (forwarded as appendix A to this enclosure) has been developed to obtain basic information relative to past HW disposal practices at your activity. The information will be used to establish priorities and initial input for further efforts described in the previously referenced Marine Corps bulletin in the 6280 series.

3. This fact form seeks information about disposal practices at your activity with respect to chemicals and other special wastes. The fact form is not concerned with the disposal of trash, garbage, and other conventional solid wastes. Information is specifically sought on past disposal operations which may have been closed but which still represent a possible threat to the environment. Assistance in completing the fact sheets is available from NAVFACENCOM field divisions.

4. The fact form has been divided into the following sections:

a. Section I.--General Information. Questions seek basic information about the activity and its environs.

b. Section II.--Disposal of Special Wastes. Questions deal with identification of active and past disposal sites at the activity.

c. Section III.--Detailed Disposal Information. Specific information is sought concerning each disposal site identified in section II. If no sites are identified, this section will not be completed.

5. The fact form will be completed by 30 January 1981 and forwarded to the Commandant of the Marine Corps (Code LFF). Copies should also be forwarded to the cognizant NAVFACENCOM field division and the Naval Energy and Environmental Support Activity (Code 212), Port Hueneme, California 94043.

MCBul 6280
11 Dec 1980

ACTIVITY _____

UIC _____

SECTION I. GENERAL INFORMATION

Person compiling this information:	
Name _____	
Code _____	Telephone _____

1. When was the activity first established? _____
2. Briefly describe the activity's mission. _____

Has this always been the activity's mission? If not, describe previous missions and when they were changed. _____

3. Estimate the activity's equivalent population. _____

Equivalent Population = activity residents + 1/3 x (employees who commute in).

4. Describe the activity's location, including:
 - a. Location within state (e.g., northeastern corner near Podunk) _____
 - b. Lies in a generally rural or urban setting? _____

5. Does the activity have any of the following operations (check the appropriate boxes)?

Ship Repair
Aircraft Rework
Aircraft Intermediate Maintenance
Motor Vehicle Maintenance
Ordnance/Demil

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Pest Control
Disaster Control
Power Generation
DPDO Salvage Yard
Hospital, Dispensary
Firefighting Training

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

Laboratory What kind? _____

Appendix A to
ENCLOSURE (1)

Doc No: CLEJ-00594-
12.07-12/11/80

MCBul 6280
11 Dec 1980

ACTIVITY _____
UIC _____

Any other industrial operations? Please list. _____

Were any industrial operations conducted in the past which have since been discontinued?
If so, please list along with the year discontinued. _____

6. Additional Comments _____

ACTIVITY _____
UIC _____

SECTION II. DISPOSAL OF SPECIAL WASTES

This section of the fact form will ask about waste disposal sites that are or have been operated by the activity. If a disposal site(s) is identified in this section, section III should be filled out.

To complete this section (and section III, if necessary), activity records should be examined and knowledgeable activity personnel should be interviewed. Long-time activity employees will be invaluable in this effort, since they will be familiar with past disposal operations. If deemed necessary to accurately complete this section, preliminary field investigations may also be performed (however, this fact form does not warrant extensive investigations such as soil borings and waste analyses).

1. Have any of the following techniques ever been used to dispose of chemicals or special wastes on base? Do not include trash or garbage (check the appropriate boxes).

	Operations Present/Past	
Solvent Pit	<input type="checkbox"/>	<input type="checkbox"/>
Acid/Caustic Pit	<input type="checkbox"/>	<input type="checkbox"/>
Slurry (Chemical Mixtures) Pit	<input type="checkbox"/>	<input type="checkbox"/>
Waste Oil/Oil Sludges Pit	<input type="checkbox"/>	<input type="checkbox"/>
Evaporating Pit	<input type="checkbox"/>	<input type="checkbox"/>
Grease Pit	<input type="checkbox"/>	<input type="checkbox"/>
Surface Spreading	<input type="checkbox"/>	<input type="checkbox"/>
Open Burning (Examples: Firefighting Training, Ordnance Waste) ..	<input type="checkbox"/>	<input type="checkbox"/>
Incinerator	<input type="checkbox"/>	<input type="checkbox"/>
Land Disposal with State Permit	<input type="checkbox"/>	<input type="checkbox"/>

Any other disposal operations?* Please explain _____

*Do not include industrial waste treatment/pre-treatment facilities that are subject to pretreatment regulations or NPDES permits. Disposal of industrial sludge should be included, however.

MCBul 6280
11 Dec 1980

ACTIVITY _____

UIC _____

2. The following questions are intended to find out whether small-scale disposal of chemicals or special wastes (whether intentional or not) may have occurred at the activity. If the activity has ever run an operation listed below, check the box in column 1 (some of these operations may have been noted in section I). If a box in column 1 is checked, go to column 2 and check the box if the answer to the question in column 2 is "yes."

	Column 1		Column 2
Refuse disposal site	<input type="checkbox"/>	Did this site ever receive chemicals or special wastes?	<input type="checkbox"/>
Pest control shop	<input type="checkbox"/>	Have pesticides or pesticide rinses ever been disposed of anywhere on a regular basis?	<input type="checkbox"/>
Firefighting training using open burning	<input type="checkbox"/>	Were substances other than oil (e.g., solvents) burned?	<input type="checkbox"/>
Ordnance operations	<input type="checkbox"/>	Were ordnance wastes ever disposed of on base?	<input type="checkbox"/>
Storage of chemical materials or special wastes in a specified area	<input type="checkbox"/>	Have these materials ever leaked or otherwise escaped confinement?	<input type="checkbox"/>

3. Section III should be completed for each disposal site identified in question 1 of this section. Section III should also be filled out for any significant disposal site identified in question 2. If the activity has NEVER disposed of chemicals or special wastes on base, completion of section III is not required.

4. Have any accidents involving hazardous materials ever occurred at the activity? If so, briefly describe the incidents.

ACTIVITY _____

UIC _____

5. Are/were there any chemical or special waste disposal sites run by organizations outside the activity's fenceline which may present a current hazard to on-base personnel? Did the activity ever operate disposal sites on property which has since been excised? Please explain.

6. In answering the questions in this section, was reliable information available on past operations? How far back in the past? What sources were used? Please explain.

7. Additional comments _____

MCBul 6280
11 Dec 1980

ACTIVITY _____

UIC _____

SITE NUMBER _____

SECTION III. DETAILED DISPOSAL INFORMATION

This section should be completed only if active or past disposal sites were identified in section II. Section III should be completed for each site. As an example, say your activity has three sites. Make three copies of section III and complete them. Assign a number to each site (1, 2, and 3) and enter it in the upper right-hand corner.

1. Is this disposal site currently in operation or has it been closed? _____

Years of operation: From _____ To _____

2. What is/was the name of the site (e.g., slurry pit)? _____

3. Where is/was the site located (provide a description and give activity map coordinates)?

4. Describe how the site is/was operated. _____

Doc No: CLEJ-00594-
12.04 - 12/11/80

MC Bul 6280
11 Dec 1980

ACTIVITY _____

UIC _____

SITE NUMBER _____

5. If the site was closed, briefly describe the closure procedures. _____

6. As well as possible, describe the wastes that entered the site.

<u>Type of Waste</u>	<u>Quantity</u>	<u>Origin</u>

MCBul 6280
11 Dec 1980

ACTIVITY _____

UIC _____

SITE NUMBER _____

7. Describe the site's hydrogeology, including information on terrain, soils, water table depth, groundwater quality, nearby surface waters, etc.

8. Briefly describe animal and plant life surrounding the site, including any peculiarities (e.g., dying plants).

9. Do personnel live or work near the site? Please explain. _____

MCBul 6280
11 Dec 1980

ACTIVITY _____

IC _____

SITE NUMBER _____

10. Have there been any incidents or complaints concerning this site? Explain.

11. How close is the site to the activity's boundaries? _____

12. Additional comments _____

