

Environmental Management Procedure (EMP) 4.4.6.6 Tab 1

Subject: EMP 4.4.6.6 Tab 1 Hazardous Materials Storage and Container Management

1. Purpose: This EMP establishes the procedures for properly managing for Hazardous Materials Storage areas and Containers.
2. Document Control: This is a controlled document. Controlled documents are updated as required, reviewed at least annually, and re-dated if changed. Any documents to include blank forms appearing in paper form are not controlled and should be checked against the file version prior to use on the:

JBLE – Eustis Environmental website: <http://www.jble.af.mil/Units/Army/Eustis-Enviromental/>

3. References:
 - A. JBLE-I 32-101, Environmental Management
 - B. EMP 3.0 EMP Dictionary
 - C. EMP 4.4.6.6 Installation Hazardous Materials Program (IHMP)
 - D. EMP 4.4.6.6 Tab 2 Monthly Hazardous Material Site Inspections FEVA Form 32-680
4. Scope: This EMP applies to all Activities and personnel, including military, civilians, vendors, suppliers, and contractor personnel who enter JBLE-Eustis. The definition of an Activity can be found in JBLE I 32-101.
5. Roles and Responsibilities:
 - A. Civil Engineer Directorate (CED); Environmental (CEIE) will:
 - (1). Provide environmental management oversight of the Hazardous Material Program, the HazMart, and overall usage of Hazardous Materials (HM) by Activities.
 - (2). Coordinate with other installation organizations having requirements for the storage and accumulation of HM. Report findings from inspections to other appropriated organizations. These include, but are not limited to:
 - (a). 633 ABW Safety Office.
 - (b). Fire and Emergency Services (F&ES) Flight.
 - (c). Preventive Medicine, Industrial Hygiene.
 - (3). Inspect HM storage areas on a periodic basis to ensure proper HM management and compliance.
 - B. Activities will:
 - (1). Provide resources for management and storage of HM.
 - (2). Establish, inspect, and maintain storage areas for HM.
 - (3). Establish, inspect, and maintain containers of HM.

- (4). Ensure HM containers are in good condition and properly stored.
- (5). Ensure all areas must meet all applicable health, safety, and fire rules and regulations. Personnel should contact the Safety Office and the F&ES Flight for specific requirements.
- (6). Ensure all Activity's HM have been approved through the HazMart.

6. Procedures:

A. Hazardous Materials Storage Areas:

(1). Site Locations:

- (a). Must be correctly sited where a spill or leak of HM would not constitute a discharge of wastes to surface waters, storm drains, or the sanitary sewage system.
- (b). Must have containment in sufficient capacity to hold 110% of the largest volume of a single container.
- (c). Sites will be protected from the elements. Collection of rain water and HMs in containment unit must be containerized and treated as a HW until determined otherwise.
- (d). Containment systems will be kept clean and dry at all times.
- (e). Ensure each storage location is identified on the on Activity's Facilities and Operations inventory (EMP 4.5.2.3. Tab 2).
- (f). All Activities using or installing any type of outside free standing storage facility/shed MUST submit an AF Form 332 (Base Civil Engineer Work Order Request); AF IMT 813 (Request for Impact Environmental Analysis); and map showing the location package for "Site Approval," to be reviewed and approved through the CED Project Review Board (PRB). If Site Approval is granted through the CED PRB, the outside/free standing storage facility/shed is not real property, and is the users sole cost and responsibility.

(2). Required equipment:

- (a). An internal communication or alarm system capable of providing immediate emergency instructions to Activity personnel.
- (b). Telephone or hand-held two way radio capable of summoning emergency assistance from the Security Forces Squadron (SFS) Police.
- (c). Portable fire extinguishers, and/or fire control equipment.
 - i. Portable fire extinguishers must be installed, inspected and maintained IAW the National Fire Protection Association (NFPA) Standard # 10 "*Standard for Portable Fire Extinguishers*". The Ft Eustis Fire & Emergency Services is the authority having jurisdiction on the selection, installation, and determining if inspected/maintained properly.

NOTE: CO2, Purple K, Water, Halon or BC are not approved for use.

- ii. Portable fire extinguishers must be installed IAW NFPA 10 and generally a minimum single 10 lb. ABC Dry Chemical type extinguisher is required. Dining facilities with wet chemical hood systems shall have extinguishers installed IAW NFPA 10, 17A, and 96 in the immediate area around the hood system, this is generally a 6 liter Class K Portable Fire Extinguisher.

- iii. A monthly inspection shall be conducted and documented by the facility manager (or designated representative) for each portable fire extinguisher IAW NFPA 10.
 - a. The Ft Eustis Fire & Emergency Service (F&ES) Fire Prevention Office can conduct an annual inspection of portable fire extinguisher that are attached to a registered building on post. The portable fire extinguisher must be current with its 6 and 12yr maintenance to allow the Ft Eustis F&ES Personnel to tag the extinguisher.
 - b. All portable fire extinguisher that are not part of a building requirement must be annually, every 6 and 12 tag attached to it by a certified inspection company. This is the responsibility of the facility Manger/owner of the item.
 - c. If monthly inspection stickers “only” are required, the facility manager can go to the Ft Eustis F&ES Fire Prevention Office to obtain stickers for monthly inspections only.
 - d. If any portable fire extinguisher should fail an inspection or maintenance action, it must be replaced immediately.
- iv. Each portable fire extinguisher shall have its annual, 6 and 12 year maintenance performed by certified maintenance personnel IAW NFPA 10.
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NOTE: If any portable fire extinguisher should fail an inspection or maintenance action, it must be replaced immediately.
- v. Portable fire extinguishers must be installed IAW NFPA 10 depending on the hazard protected (which could be 30 or 50 feet).
 - a. If the portable fire extinguisher is not readably noticeable from the storage area, a sign within view of the storage area must be placed above the fire extinguisher station
 - b. Fire extinguishers must be mounted IAW NFPA 10 which normally means no closer than 4 inches from the floor to the bottom of the fire extinguisher and so the top of the fire extinguisher is not more than 5 feet from the floor.
 - c. Portable fire extinguishers must be located at the site. Can be inside or outside of the containment device.
- (d). Spill kit and decontamination equipment. Has to be capable with HM stored and of adequate to absorb largest volume of HM.
- (e). Proper Personal Protection Equipment (PPE).

- (f). Eye washing facilities as required.
- (3). Water, at adequate volume and pressure, to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray equipment.
- (4). All areas will have signs indicating (must be readable from 50 feet for outside locations):
 - (a). "Hazardous Materials Storage Area".
 - (b). "No Smoking"
 - (c). "Unauthorized Personnel Keep Out"
- (5). Emergency Response Information: "Points of Contact" and "Telephone Numbers" will be posted at each site.
- (6). Each area will have a site specific Contingency Plan (CP) IAW EMP 4.4.7.6.C.
- (7). All sites will maintain a copy of the "Incompatible Materials Chart." Copies of this chart may be obtained from the HWAF.
- (8). Flammable storage lockers.
 - (a). Are not authorized for use in outside unprotected from the environment.
 - (b). No more than 3 lockers can be adjacent to each other and sets of 3 must be separated by at least 100 feet.
 - (c). Must have 3 point hitch doors.
 - (d). If the lockers have been physically altered in anyway, it is no longer approved for flammable storage use.
 - (e). To meet fire regulations, flammable storage lockers must also have signs "Flammable - Keep Fire Away."
- (9). All material will have adequate aisle space. Adequate aisle space will allow the unobstructed movement of fire protection; spill control, decontamination equipment and personnel in case of an emergency to the problem container(s) within a storage area.
- (10). All storage areas will be inspected at least monthly using the FEVA Form 32-680 (EMP 4.4.6.6 Tab 2).
- (11). An SDS will be available on-site (work area) and be easily accessible to employees for each HM stored and/or used by that activity.
 - (a). Safety Data Sheet (SDS) management is the responsibility of all Activities that store or use Hazardous Materials. These documents must be:
 - (b). Immediately available to employees, not locked up or at another location.
 - (c). BOUND, not in a box or bag, (e.g., in notebooks in the work area(s)).
 - (d). Indexed with a Table of Contents that depicts HOW the book is organized.

- (e). Training log in the book.
 - (f). Updated annually and for chemicals no longer present in the area removed from the book and archived somewhere else.
 - (g). The bottom of the page needs to be dated... either by hand or by computer... when the NEW sheet is added to the book. The date of preparation by the MFG may be 10 years old and this is not what we go by to ensure it has been updated SDS must include the date of preparation of the material safety data sheet or the last change to it.
 - (h). A Hazardous Chemical list must be maintained at each work area and all personnel who work at the site will sign and date the list on an annual basis indicating that they are aware of the hazards associated with these products.
 - (i). An up to date AUL may be used as the list. An inventory by quantity is not required.
- (12). Good house keeping will be maintained at all times.
- B. Container usage and storage:
- (1). All containers must be properly labeled at all times.
 - (a). Labels must conform to OSHA, DOT, and Post Safety standards as required. The Post Safety Office can provide information on proper labeling requirements.
 - (b). The trade name on the label should match the trade name on the Safety Data Sheet (SDS). If you do not have a SDS for the product, request one from the HazMart or the supplying organization when you order the HMs.
 - (c). Labels have to remain on containers until they are sufficiently cleaned of residues and purged of vapors to remove any potential hazards. Sometimes referred to as "DOT or OHSA" Empty. Not to be confused with "RCRA" empty.
 - (d). Labels and markings no longer applicable to the contents will be removed, defaced to make them unreadable, or painted over.
 - (e). Labels and markings must be replaced if they become damaged or lost.
 - (f). Containers of hazardous materials not properly labeled should not be accepted by the requisitioning Activity.
 - (g). Containers of hazardous materials must be Bar Coded with current Bar Codes issued by the HazMart.
 - (2). Containers will be stored in such a manner that allows for easy access to container labels. Under no circumstances should containers have to be moved in order to read any label or opened to determined container contents.
 - (3). If a container holding materials is not in good condition (signs of bulges, damage, or corrosion, etc) or begins to leak, the contents will be transferred to an approved serviceable container immediately.
 - (4). A container must always be closed during storage except when it is necessary to add or remove materials or wastes.
 - (5). A container shall not be opened, handled, or stored in a manner that may rupture the container or cause

- it to leak.
- (6). Containers of liquids must not be overfilled. Containers must have 3 to 4 inches of head space (ullage) to allow for expansion to temperature changes.
 - (7). Containers must be compatible with the materials being contained.
 - (8). Containers will not be reused for other purposes until "DOT or OHSA" Empty.
 - (9). Containers of materials which are incompatible with other containers of materials or wastes stored nearby will be separated or protected from the incompatible materials by means of a dike, berm, wall, or other device to prevent the mixing of incompatible materials if contents leak or are spilled.
 - (10). Containers must be kept on pallets if not using containment pallets or "HazMat Storage Buildings" with containment.
 - (11). Containers must be protected from the environment (rain, snow, etc.).
 - (12). Serviceable products will not be stored with wastes. Wastes must be physically separated from other materials, e.g., chains or ropes with signs, fences, walls, etc.
 - (13). Temperature sensitive materials will be stored to prevent exposure to temperature extremes.
 - (14). HM will be stored in well-ventilated areas.

C. Transportation of HM:

- (1). Transportation of HMs is highly regulated by DOT and must meet stringent requirements. LRS, Transportation Division should be contacted for additional on-post and off-post transportation requirements.
- (2). On-Post transportation must meet the following requirements:
 - (a). Only government approved or licensed contractor vehicles should be used. HazMart will not issue HMs to personnel in POVs.
 - (b). Vehicles will have fire extinguishers appropriate for the type of materials being moved.
 - (c). If containers have free liquids, then a spill kit will be carried.
 - (d). Containers will be secured to prevent movement of containers or spills.

D. Disposition:

- (1). Disposition of HMs does not necessarily imply disposal, which is a waste operation.
- (2). HMs no longer needed for the original process may be reused for another process.
- (3). HMs may be returned to the HazMart for restocking. The HazMart will make a determination based on several factors, for example: condition, date, demand, etc., to determine if the HMs can be re-stocked.
- (4). In a limited number of cases, HMs may be recycled.
- (5). HMs may have to be "wasted out" as Hazardous Wastes or a Non-Hazardous Wastes.

- (6). A container shall not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.
- (7). Containers of liquids must not be overfilled. Containers must have 3 to 4 inches of head space (ullage) to allow for expansion to temperature changes.