

Environmental Management Procedure (EMP) 4.4.6.8.2

Subject: Hazardous, Universal, and Non Hazardous Waste Accumulation Site Management

1. Purpose: This EMP establishes the procedures for establishing, inspecting, and maintaining storage and accumulation sites for Hazardous Wastes (HW), Universal Wastes (UW) except batteries and lamps, and Non-Hazardous Wastes (NHW).
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 Dictionary
 - C. EMP 4.4.6.8 Hazardous Waste Management (HWM)
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). Keep an up to date list of all TSSs, SASs, and NHSs.
 - (2). Notify the Virginia Department of Environmental Quality (VDEQ) in advance of accumulating wastes in a new TSS.
 - (3). Coordinate with other installation organizations having requirements for the storage and accumulation of wastes. These include, but are not limited to:
 - (a). 633 ABW Safety Office.
 - (b). Fire and Emergency Services (F&ES) Flight.
 - (c). Preventive Medicine and Industrial Hygiene.
 - (4). Inspect accumulation areas on a periodic basis to ensure compliance.
 - (5). Report findings to other appropriated organizations.
 - B. Activities will:
 - (1). Establish, inspect, and maintain storage and accumulation sites Hazardous Wastes (HW), Universal Wastes (UW) except batteries and lamps, and Non-Hazardous Wastes (NHW).

- (2). Ensure personnel, e.g., AECs, UECs, HWCs, HWSSs, and UWHs managing these areas have the appropriate training IAW EMP 4.4.2.
- (3). Ensure each TSS, SAS, and NHS will be assigned a primary and alternate HWC IAW EMP 4.4.6.8.5.C. (2).
- (4). Ensure all areas must meet all applicable health, safety, and fire rules and regulations. Personnel should contact Post Safety and the Fire & Emergency Services for specific requirements.
- (5). Ensure each accumulation location identified on the on Activity's Facilities and Operations inventory (EMP 4.5.2.3. Tab 2) will be identified on a strip map of that area.
- (6). Ensure that all records are safe guarded from lost or damage, especially during change of AECs.

6. Procedures:

A. General Requirements for all Hazardous Wastes (HW) and Non-Hazardous Wastes (NHW) Accumulation site:

- (1). Records: The Commander/Director having AEC appointing authority will establish a chain of custody for all records and sign for from the outgoing AEC and issue to the incoming AEC.
- (2). Site Locations:
 - (a). Must be correctly sited where a spill or leak of HWs or NHWs 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, HWs, NHWs, or any other materials in the 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). 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.
- (3). 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 Military Police will in the immediate area at all times.
 - (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.
 - 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.

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 compatible with wastes stored and of adequate capacity to absorb largest single volume of wastes.
- (e). Proper Personal Protection Equipment (PPE).
- (f). Eye washing facilities as required.
- (4). Water, at adequate volume and pressure, to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray equipment.
- (5). All areas will have signs indicating (must be readable from 50 feet for outside locations):
- (a). “Hazardous Waste Temporary Storage Site – TSS”; or “Hazardous Waste Satellite Accumulation Site – SAS”; or “Non-Hazardous Site, Satellite Accumulation Area – NHS”
 - (b). “No Smoking”
 - (c). “Unauthorized Personnel Keep Out”
- (6). Emergency Response Information: “Points of Contact” and “Telephone Numbers” will be posted at each site utilizing Emergency Notification, FEVA form 32-700 (EMP 74.4.6.8.1 Tab 6).
- (7). Each site will have a site specific Contingency Plan (CP) IAW EMP 4.4.7.6.C.
- (8). Sites storing containers holding ignitable or reactive materials or wastes shall be located at least 50 feet within the installation’s property line.
- (9). All materials and wastes stored in containers IAW EMP 4.4.6.8.3.
- (10). All sites will maintain a copy of the “Incompatible Materials Chart.” Copies of this chart may be obtained from the HWAF.
- (11). All waste accumulation areas 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.
- (12). Good house keeping will be maintained at all times.
- (13). All TSSs, SASs, and NHS will be inspected at least weekly (Not more than 7 Calendar Days) using the FEVA Form 32-698 (EMP 4.4.6.8.2 Tab 2).
- (14). All TSSs will maintain an electronic inspection log using EMP 4.4.6.8.2 Tab 4 TSS Weekly Inspection Report Log. This inspection log will be signed by the Commander/Director having AEC appointing authority and emailed to the CEIE HW Program Manager by the 10th of the month following the close of the calendar quarter (10 Jan, 10 Apr, 10 Jul, or 10 Oct). Both the signed copy and the Excel format log must be emailed. If the Commander/Director is the one emailing the log, then the log doesn’t have to signed when the email is digitally signed.

B. General Hazardous Waste Accumulation Site management:

- (1). JBLE-Eustis is a Large Quantity Generators and must properly manifest HWs with 90 days of the Accumulation Start Date (ASD); therefore each installation is authorized to accumulate Hazardous Wastes (HWs) in only two types of accumulation areas:
 - (a). Less than 90 Temporary Storage Sites (TSSs): TSSs are usually permanent long term waste accumulation sites that support ongoing operations. Occasionally, construction projects or other short term projects may require use of a TSS.
 - (b). Satellite Accumulation Sites (SASs). SASs can be permanent or very short term, i.e. days or weeks intended to accumulate very limited quantities and one type of hazardous waste.
 - (c). Only Hazardous Wastes, Universal Wastes, and Non-Hazardous Wastes may be accumulated in a TSS or SAS. **No Hazardous Materials, Used Oil, or recyclable materials may be stored with HWs.**
- (2). Due to mission requirements, a TSS may be inactivated for a short period of time.
 - (a). The inspection form must be annotated that all wastes have been turned-in and no un-corrected deficiencies remain.
 - (b). Upon reactivation, an initial inspection will be accomplished.
 - (c). Utilizing FEVA Form 699 (EMP 4.4.6.8.2 Tab 1), CEIE will be notified within 3 working days of both inactivation and reactivation.
- (3). Hazardous Wastes generated during field training exercises on post or on vessels, which remain on-site over night, must be stored in a SAS.

C. Satellite Accumulation Sites - SASs:

- (1). Must be located at or near the process generating the HW, where the waste initially accumulates.
- (2). Under the control of the operator of the process generating the waste.
- (3). If the HW must pass through a threshold or door to reach the accumulation site, then a SAS can not be used.
- (4). In large open bays or hangers, etc, the SAS must be close to the site of HW generation.
- (5). Must not accumulate more than 55 gallons of HW or one quart of acutely HW (P-listed and some high number F-listed wastes). The accumulation start date must be filled in when the quantities above are exceeded or when a smaller container is filled and ready to be turned in.
- (6). These containers must be transferred to a TSS or the HWAF within three (3) days.

D. Less than 90 Day Temporary Storage Sites - TSSs:

- (1). May be located at a distant site from the point of initial generation.
- (2). May receive HWs from multiple generation sites including SASs. UWs and NHWs may be received from multiple sites

- (3). May store any quantity of HWs.
- (4). Accumulation Start Date (ASD) must be the date that HW is first put into a container at the TSS or the accumulation start date put on at the SAS.
- (5). All containers of HW must be transferred to the HWAF within 14 days of the ASD or 17 days if the waste was transferred from a SAS.
- (6). A TSS cannot be changed to a SAS, NHS or vice versa without prior written approval from CEIE.

E. Non-Hazardous Site, Accumulation Areas - NHSs:

- (1). May be located at a distant site from the point of initial generation.
- (2). May receive NHWs and recyclables from multiple generation sites including other NHSs.
- (3). May store any quantity of NHWs, UWs or recyclables.
- (4). Only Non-Hazardous Wastes (NHWs), Universal Wastes (UWs) and recyclables will be accumulated in NHSs.
- (5). **NO Hazardous Wastes (HWs).**
- (6). Containers of wastes must be turned in within the shorter of 1 year from the date of initial accumulation or 1 year from the date of container issue.

F. TSS, SAS, and NHS Approval Process:

- (1). CEIE must grant approval prior to closing a site.
- (2). All TSS, SAS, and NHS requirements must be met while the site is operational.
- (3). TSS Approvals:
 - (a). The F&ES, Safety Office, and CEIE must grant approval prior to establishing a new site or relocating an existing site.
 - (b). All TSS requirements must be met before the site can be used or approved.
 - (c). At least 20 days prior to the establishment and use of a TSS, a completed approval FEVA Form 699 (EMP 4.4.6.8.2 Tab 1) must be submitted to CEIE.
 - i. All items on the form must be completed.
 - ii. FEVA Form 32-697, Waste Description Log (WDL), EMP 4.4.6.8. Tab 1 for each waste stream must be attached.
 - iii. Site Specific Contingency Plan will be included IAW EMP 4.4.7.
 - iv. The FEVA Form 32-699 will be signed by the Commander or Director having AEC appointment authority.
 - (d). CEIE will inspect the site prior to granting final approval.

- (e). Each site will be given an approval number that must be used for waste disposal and reporting.
- (4). SAS or NHS Approvals:
- (a). Within 3 days of the establishment and use of a SAS or NHS, a draft FEVA Form 32-699 must be submitted to CEIE. This draft may be signed by the AEC.
 - i. Waste Description Log for each waste stream must be attached.
 - ii. Draft site specific Contingency Plan must be included.
 - iii. CEIE will inspect the site to determine if it meets SAS and NHS requirements and issue an approval number.
 - iv. The F&ES and Safety Office will be notified by CEIE.
 - (b). If the SAS or NHS is expected to continue operating for more than 30 days, then final approval must be obtained within 30 days after the draft approval.
 - i. The FEVA Form 32-699 will be signed by the Commander or Director having AEC appointment authority.
 - ii. The Fire & Emergency Services and Post Safety Office must ensure the location meets fire and safety regulations for the wastes being accumulated.
 - iii. CEIE will inspect the site prior to granting final approval. Each site will be given an approval number that must be used for waste disposal and reporting.
- G. Universal Waste (UW) Sites:
- (1). UW sites need to be sited where a spill or leak would not constitute a discharge to surface waters, storm drains, or the sanitary sewage system.
 - (2). Sites will be protected from the elements.
 - (3). Must have containment in sufficient capacity to hold 110% of the largest volume of a single container.
 - (4). Containment systems will be kept clean and dry at all times.
 - (5). All activities using any type of outside or free standing storage building must coordinate with CED Master Planner.
 - (6). Proper Personal Protection Equipment (PPE).
 - (7). Emergency Response Information: "Points of Contact" and "Telephone Numbers" will be posted at each site utilizing Emergency Notification, FEVA Poster 20-E.
 - (8). UWs that have liquids must have containment and the appropriate spill kits (acid, base, mercury, etc).
 - (9). AEC must keep a file on all locations. These must be recorded on the facility inventory: EMP 4.5.2.3 Tab 2 Form - Activity Facilities and Operations Inventory.
 - (10). Universal Wastes sites will be inspected at least monthly using the FEVA Form 32-695 (EMP

4.4.6.8.2 Tab 3).

- (11). Good house keeping will be maintained at all times.
- (12). All materials and wastes stored in containers IAW EMP 4.4.6.8.3.
- (13). UWs must be turned-in at the Hazardous Waste Accumulation Facility (HWAF) within the shorter of 270 days of the ASD or container issue date.
- (14). Turn-in procedures in EMP 4.4.6.8 for HWs will be used for UWs.
- (15). Universal Wastes will be stored in existing SASs or TSSs where practical.
- (16). Universal Wastes (UW) Batteries will be managed IAW EMP 4.4.6.8.5 Battery Recycling and Disposal Management.
- (17). Universal Wastes (UW) Lamps will be managed IAW EMP 4.4.6.8.4 Universal Waste (UW) Lamps.