

## Environmental Management Procedure (EMP) 4.4.6.8.3

### Subject: Hazardous, Universal, Non Hazardous Waste, Abandoned, Empty, and Large Container Management

1. Purpose: This EMP establishes the procedures for the management of containers, e.g., Hazardous Wastes, Universal Wastes excluding batteries and lamps, Non Hazardous Wastes, Abandoned, Empty, Large Containers, etc.

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-Environmental/>

3. References:

A. JBLE-I 32-101, Environmental Management

B. EMP Dictionary

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):

(1). Inspect storage and accumulation areas on a periodic basis to ensure proper container management.

(2). Coordinate with other installation organizations having requirements for the storage and accumulation of materials and wastes. These include, but are not limited to:

(a). Installation Safety Office.

(b). Fire and Emergencies Services.

(c). Preventive Medicine and Industrial Hygiene.

(3). Report findings to other appropriated organizations.

B. Activities will:

(1). Inspect and maintain containers for Hazardous Wastes (HW), Non-Hazardous Wastes (NHW), and Universal Wastes (UW) are in good condition and properly stored.

(2). 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.

6. Procedures

A. General:

- (1). All containers must be properly labeled at all times. This includes serviceable materials, wastes, recyclable materials, and empty containers.
  - (a). Labels and markings must be replaced if they become damaged or lost.
  - (b). 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.
  - (c). Labels and markings no longer applicable to the contents will be removed, defaced to make them unreadable, or painted over.
- (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.

B. Container usage and storage:

- (1). If a container holding wastes 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.
- (2). A container must always be closed during storage except when it is necessary to add or remove materials or wastes.
- (3). A container shall not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.
- (4). 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.
- (5). Incompatible materials or wastes will not be placed in the same container.
- (6). Containers must be compatible with the wastes being contained.
- (7). Containers will not be reused for other purposes until “DOT or OHSA” empty. Only containers issued by the HWAF will be used to accumulate wastes.
- (8). Containers of wastes which are incompatible with other containers of materials or wastes stored nearby will be separated or protected from the incompatible wastes by means of a dike, berm, wall, or other device to prevent the mixing of incompatible materials if contents leak or are spilled.
- (9). Containers must be kept on pallets if not using containment pallets or “HazMat Storage Buildings” with containment.
- (10). Containers must be protected from the environment (rain, snow, etc.).
- (11). 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.
- (12). 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. (THIS IS NOT THE ACCUMULATION START DATE).

C. Management of Unknown or Abandoned Containers: ***All Unknown Or Abandoned Containers Should Be***

***Handled With Caution! Do Not Assume That A Label Accurately Reflects Contents!***

- (1). Immediately, upon discovery or someone reporting an unknown or abandoned container, accomplish the following:
  - (a). If container is leaking, call 911.
  - (b). If the container is not leaking;
    - i. Try to identify the contents from markings, labels, etc. Note date, time, and location.
    - ii. Try to identify the owner of the container(s) from area of responsibility, questioning personnel in the surrounding area, etc.
  - (c). If ownership can be determined, ensure appropriate personnel are notified and the container is properly managed.
  - (d). If ownership can not be determined, notify the Security Forces Squadron (SFS) Police immediately, who will investigate to determine the owner of the container.
    - i. The SFS Police will provide CEIE with a copy of their findings.
    - ii. Large containers whose owners can not be identified will be turned over to DOL as abandon property on post and will be disposed. Owners will be responsible for all costs if found.
- (2). Containers not acted upon immediately (within 4 hrs) will become the property of the Activity where the container is located.
- (3). CEIE will provide additional instructions and assistance on a case-by-case basis as required.
- (4). The reporting Activity will be responsible for assisting HWAF personnel until the container is picked-up. The owner will be liable for all costs associated with such investigations and disposal.

**D. Empty Containers:**

- (1). Containers may not be reused for other purposes or disposed until “DOT or OHSA” empty.
  - (a). RCRA empty containers are not managed as hazardous wastes, however, previously used containers must be:
    - i. Sufficiently cleaned of residues and purged of vapors to remove any potential hazards before being classified “DOT or OHSA” empty.
    - ii. Containers not RCRA or “DOT or OHSA” empty must not be left open to allow their contents to dry or evaporate.
  - (b). Previous labels have to remain on containers until empty.
  - (c). Previous labels must be removed, defaced, or painted over once the container is empty.
- (2). Empty containers must be labeled individually as “empty” unless the container storage area is clearly designated as a “storage area for empty containers”.
- (3). Containers designated for spills will be labeled “EMPTY” and “FOR SPILL USE ONLY”.

E. Containers of Hazardous Wastes (HWs) and Non Hazardous Wastes (NHWs):

- (1). Only DOT approved containers will be used for waste accumulation. DOT approved containers must be marked with United Nations markings.
- (2). Containers holding ignitable or reactive wastes shall be located at least 50 feet within the installation's property line.
- (3). Acquisition of containers and labels:
  - (a). For activities that use the HWAF for turn-ins, the HWAF will provide pre-labeled containers for wastes and "Empty" containers for spills to Activities with approved TSSs, SASs, or NHSs on a reimbursable basis. The HWAF will also issue a partially completed Container Contents Log (CCL) for each container. See EMP 4.4.6.8.1 TAB 2.
  - (b). Activities that do not use the HWAF for waste turn-ins, the Activity is responsible for all acquisition and "HazMat Employee" training requirements under DOT.
- (4). A CCL must be kept for each container of HWs and NHWs. The HWAF will issue all container numbers, which must match the container number on the container label.
- (5). Hazardous Waste labeling:
  - (a). Containers of HW must have a HW label (correctly completed): The following information is required:
    - i. DOT Proper shipping name.
    - ii. DOT ID Number.
    - iii. Name and address of the installation (See EMP4.4.6.8).
    - iv. EPA ID Number (See EMP4.4.6.8).
    - v. EPA Hazardous Waste Codes.
    - vi. Accumulation start date (ASD) - entered as required by TSS or SAS personnel.
    - vii. Container number from the CCL should be written in the upper left hand corner of the HW label.
    - viii. Manifest document number - entered at time of shipment.
    - ix. DOT Hazard Class.
    - x. DOT packaging group.
  - (b). DOT hazard class labels meeting DOT labeling requirements must be on each HW container (EPA and DOT labels must be within 6 inches of each other).
- (6). Non-Hazardous Waste labeling:
  - (a). Containers of Non-Hazardous Wastes should be labeled with a Non-hazardous Waste label,

correctly completed.

- (b). The contents of the container must be adequately described. If the NHW is DOT regulated, all DOT shipping information must be entered and the appropriate DOT hazard class labels applied within 6 inches of the NHW label.
  - (c). Container number from the CCL should be written in the upper left hand corner of the NHW label.
  - (d). “Non regulated” labels should be avoided. The words “non-regulated” are often misleading. This label only means that this material is not regulated as a hazardous waste.
- (7). Activities will certify that the contents of each container of waste are accurately listed on each CCL. The AEC must make this certification. The HWC can co-certify. When the Activity does not have an AEC, the commander or director having appointing authority for the AEC will sign the CCL.
- (8). The Container Turn-in Log (CTL):
- (a). Activities are required to maintain a calendar year CTL (EMP 4.4.6.8.1 Tab 4) for each waste site. A CTL must be maintained and kept with the Activity’s completed copy of the DD Form 1348-1As for each site.
  - (b). Most of the items on the CTL come directly from the CCL and DD Form 1348-1A and are self-explanatory. The following items may need clarification:
    - i. Date of turn-in: This date must match the date the material was received by the HWAF or manifested (if other disposal options are used).
    - ii. Person turning-in: This should be the AEC or HWC.

F. Containers of Universal Wastes (UWs):

- (1). All containers of UWs must have a label indicating the type of UW, e.g., UW Pesticides, UW Mercury Containing devices.
- (2). All containers of UW must have the Accumulation Start Date marked on the label.
- (3). Some UWs will be required to have a DOT label.
- (4). All UWs must be in DOT approved containers.
- (5). All UWs will have a CCL.
- (6). Turn-ins of all UWs will be recorded on the CTL.
- (7). Universal Wastes (UW) Batteries will be managed IAW EMP 4.4.6.8.5 Battery Recycling and Disposal Management.
- (8). Universal Wastes (UW) Lamps will be managed IAW EMP 4.4.6.8.4 Universal Waste (UW) Lamps.

G. Packaging of Hazardous Wastes (HWs) and Non Hazardous Wastes (NHWs):

- (1). Packaging may affect the disposal costs and options available for a specific waste stream.
- (2). Do not mix waste streams in the same container.

- (3). The following rules for packaging must be followed for turn-ins at the HWAFs or the waste will be rejected:
- (a). Do not place free liquids in containers not approved for liquids, generally open-top type containers.
  - (b). Do not mix containers less than 5-gallon in capacity with containers that are equal to or larger than a 5-gallon in the same over pack container.
  - (c). Do not mix aerosol cans with any other containers in an over pack container.
  - (d). Do not mix solids and liquids in the same over pack container.