Environmental Management Procedure (EMP) 4.4.6.8

Subject: Hazardous Waste Management

1. Purpose and Policy:

   A. Purpose: This EMP establishes the procedures for managing Hazardous Wastes (HWs), Universal Wastes (UWs), and Non-Hazardous Wastes (NHWs) that are generated or managed by the Activity.

   B. Policy: Comply with all legally applicable Federal, State, and local regulations, both substantive and procedural, for managing Hazardous Waste (HW), Universal Waste (UW), and Non-Hazardous Waste (NHW) to minimize the toxicity and quantity through the efficient and effective management of the generation, collection, accumulation, and disposal.

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

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). Manage the Installation's HWM program.

      (2). Operate a centralized Hazardous Waste Accumulation Facility (HWAF) IAW EMP 4.4.6.8.1.

   B. HWAF Operations Officer:

      (1). Coordinates with the Hazardous Waste Program Manager on policy and regulatory matters to ensure compliance.

      (2). Coordinates with the HWAF Manager to ensure smooth operations of the HWAF.

      (3). Ensures that the HWAF Functional Area Continuity Books is reviewed annual and is up to date.

      (4). Ensures quality assurance of pending shipments utilizing advance copies of delivery orders is accomplished.

      (5). Ensures waste shipments are done within the regulatory 90 day time-frame.

      (6). Ensures all shipping documents, which include Manifests, Land Disposal Restriction Notification Forms, Delivery Orders, and other documents are correct before accepting and signing them after shipments are made.

(7). Ensures all shipping documents are prepared correctly and in a timely manner.

(8). Ensures all required documents and facilities are prepared for external inspectors (Local, State Federal).

(9). Ensures all Multi-Media Inspections (Self-Audits) of the HWAF are accomplished in a timely manner.

(10). Ensures all shipping documents are processed and ready for data entries within 25 days of the shipment.

(11). Coordinates the funding obligation for the collection of used oil and off-specification fuel is accomplished.

(12). Ensures used oil and off-specification fuel from the activities meet all regulatory standards.

(13). Coordinates special collection of used oil from buildings being demolished, is for tanks being filled in placed.

(14). Conducts used oil quality assurance at least once a quarter.

(15). Maintain good customer relations by:

(a). Responding to all telephonic inquiries relating to compliance issues.

(b). Responding all inquiries relating to compliance issues, while on site visits.

(c). Assisting Activity personnel in preparing for any and all inspections.

C. HWAF Operations Manager:

(a). Ensures smooth operations of the HWAF.

(b). Coordinates with the Hazardous Waste Program Manager on policy and regulatory matters to ensure compliance.

(c). Ensures waste shipments are done within the regulatory 90 day time-frame.

(d). Ensures all supply requirements are identified and proper documents are prepared and submitted for the continual operation of the facilities, also ensure that funds are obligated in a timely manner.

(e). Maintain good customer relations by:

i. Responding to all telephonic inquiries relating to compliance issues.

ii. Responding all inquiries relating to compliance issues, while on site visits.

iii. Assisting Activity personnel in preparing for any and all inspections.

(f). Ensures that the HWAF Functional Area Continuity Books is up to date by assisting the HWAF Operations Officer.

D. Activities will:

(1). Have the Commander/Director ensure the integrity and safeguarding of HWM records IAW EMP 4.4.4 Tab 1.

(2). Have the Commander/Director sign all documents in the absence of an AEC. This action cannot be delegated to subordinates.

(3). Comply with all HWM and UWM requirements at all times. Mismanagement of Hazardous Materials or UW may be considered an illegal HWM activity.

(4). Ensure AECs are trained before assuming any AEC duties IAW EMP 4.4.2 AECs may act on behalf or in lieu of HWCs.

(5). Ensure HWCs are trained before assuming any HW duties IAW EMP 4.4.2.

(6). All services offered by the HWAF must be scheduled and coordinated IAW EMP 4.4.6.8.1.

6. Procedures:

A. Hazardous Waste Management (HWM) - General:

(1). The installation has its own EPA identification number (EPA ID) and mailing address, which must be used on documents, e.g., official correspondence, profiles, manifests, labels, etc:

EPA ID Number: VA8213720321

Joint Base Langley Eustis – Eustis (JBLE – Eustis)
733d Mission Support Group; Civil Engineer Division;
ATTN: CED/CEIE
1407 Washington Blvd.
Fort Eustis, VA 23604-5306
757-878-3915

(2). The installation is designated, facility fence line to fence line as a Large Quantity Generator (LQG) of hazardous waste. The installation is ultimately responsible for the proper management of hazardous materials and for all wastes generated on post, regardless of which Activities actually manage hazardous materials or generate the waste.

(3). LQGs generate 1000 Kg of Hazardous Wastes or 2.2. Kg of acutely Hazardous Wastes of or more per month during any calendar year. LQGs must properly ship Hazardous Wastes within 90 days of the Accumulation Start Date (ASD) and Universal wastes within 365 days of the ASD.

(4). The HWM process includes but is not limited to the following steps:

(a). Waste identification

(b). Waste classification

(c). Containerization and labeling

(d). Accumulation site management

(e). Weekly (Not more than 7 Calendar Days) Site Inspections

(f). Transportation

(g). Disposal

(h). Reporting

(i). Activity maintains copies of all HWM records for 3 years

(j). Hazardous Waste Minimization (HazMin) Plan

B. Activity Waste Identification: Each Hazardous Waste, Non-Hazardous Waste, and Universal Waste that an Activity generates must be properly identified and classified.

(1). A Waste Description Log (WDL) will be prepared by the generating Activity and updated annually for each HW and NHW using FEVA Form 32-697 (EMP 4.4.6.8 Tab 1).

(a). The WDL will include: names, quantities, and Stock Numbers (NSNs or LPNs) of HMs used; SDS information; Shop Codes; names and quantities of non hazardous materials used; and a description of the process used to generate the waste.

(b). The WDL will be approved by the HWAF.

(c). Activities must plan for anticipated waste generation prior to actual waste generation.

(d). Prior to generation: The WDL should be prepared based on the materials to be used and the proposed operational process. Activities must ensure that personnel are trained and that the appropriate accumulations sites have been established for the types of waste being generated.

(e). Post Generation: In addition to the above documentation for prior generation, laboratory analysis may be required.

(f). Generating process knowledge may be used for unused commercial products or when the hazardous constituents from specific processes are well documented.

(g). SDS for each HMs will be attached to the WDL.

(h). Laboratory analysis will be used in other cases because often SDS or product specifications are not sufficient to properly identify wastes.

(i). Laboratory analysis will be used for “unknown materials”.

(2). Laboratory analysis: When laboratory analysis is required either due to an “unknown” situation or a poorly characterized waste, immediate priority must be given. The 90-day clock starts when the solid waste was generated or the “unknown” was discovered. Not when the lab results are completed. Coordination with the HWAF is required ASAP.

(3). It’s the Activity’s responsibility to fund for analysis.

(a). All purchase requests through contracting or other sources by the Activity for sampling and analysis of waste streams will be coordinated with the CEIE.

(b). Sample Plan: A project specific sampling plan will be will be prepared and completed IAW SW846 for projects which are more than simple container sampling. The contractor will submit a Sample Plan for the CEIE review and approval for projects under contract.

(c). HWAF may secure sampling and analysis for Activities as follows (all costs will be the Activity’s responsibility):

i. Sampling and analysis of unknown materials upon request.

ii. Sampling and analysis of poorly characterized materials or wastes.

iii. Periodic sampling and analysis of wastes turned in at the HWAF or accumulated at TSSs, SASs, or NHS for the installation's QA/QC program. Activities should plan on sampling each waste stream annually.

(d). CEIE will assist when "abandoned" containers have been reported to the Military Police.

C. Waste Stream Classification:

(1). Based on the information provided by the activity on the Waste Description Log, the HWAF will make a HW determination and classify the waste***. It is extremely important that information provided by the activity is accurate! Misclassification of wastes is a major violation.***

(2). The HWAF verifies that the material is a SW and determines if any exceptions or exclusions can apply.

(3). The HWAF determines if the SW meets the definition of a HW, if it meets any of the following criteria:

(a). It is a listed HW if:

i. "P" - Listed (Acutely HW): Discarded commercial chemically pure products or sole active ingredient, off-specification species, container residues, or spill residues listed on the "P" list. Waste codes start with "P", e.g. P001.

ii. "U" - Listed (Toxic HW): Discarded commercial chemically pure products or sole active ingredient, off-specification species, container residues, or spill residues listed on the "U" list. Waste codes start with "U" e.g. U001.

iii. "F" - Listed: Mostly spent solvents from non-specific sources. Waste codes start with "F" e.g. F001.

iv. "K" - Listed: Mostly wastes from specific manufacturing sources. Waste codes start with "K" e.g. K001.

v. Container residues or spill residues from listed wastes.

vi. Mixture of SW and a listed hazardous waste.

(b). It is a Characteristic HW, if it exhibits any of the following characteristics (See Glossary for definitions):

i. Ignitability.

ii. Corrosivity.

iii. Reactivity.

iv. Toxicity

v. Mixture of SW and characteristic HW, only if the resulting mixture exhibits a characteristic of a HW.

(4). If the SW does not meet the definition of a HW and originated from a HM or HC, then it is classified as a Non-Hazardous Waste (NHW).

(5). The HWAF will match the waste to an existing waste profile or create a new profile.

(6). Waste Tracking: Each container of waste must be tracked from origin to the final disposal. Various reporting requirements must be accomplished during this multi-year process.

D. Temporary Storage Sites (TSSs), Satellite Accumulation Sites (SASs), or Non-Hazardous Satellite Accumulation Area (NHSs): EMP 4.4.6.8.2 provides all the specific procedures to be used for managing TSSs, SASs, and NHS.

E. Management of Containers. EMP 4.4.6.8.3 provides all the specific procedures to be used for managing containers.

F. Transportation.

(1). On-Post movements of HWs, UWs, and NHWs must meet the following requirements:

(a). Only government approved or licensed contractor vehicles will be used to move HWs, UWs, or NHWs - Absolutely no POV's.

(b). The HWC or AEC will supervise all movements of HWs and NHWs.

(c). Vehicles moving HWs, UWs, and NHWs will have fire extinguishers appropriate for the type of materials being moved.

(d). If containers of HWs, UWs, or NHWs have free liquids, then a spill kit will be carried.

(e). Vehicles must be placarded IAW DOT regulations as a guideline.

(f). A correctly completed DD Form 1348-1A, Turn-in Document IAW EMP 4.4.6.8.1 TAB 1 and or Container Content Log (CCL), will serve as shipping documentation on Base.

(g). A correctly completed Container Content Log (CCL) IAW EMP 4.4.6.8.1 TAB 2.

(h). Containers will be secured to prevent movement or spills.

(i). HWs will not be stored on vehicle(s) overnight.

(2). Licensed Transporters. Only licensed transporters of HWs or UWs will be allowed to transport HW or UWs, off the installation. These transporters will meet all requirements of DOT, EPA, and DEQ. No licensed transporter will bring HW or UWs onto the installation unless the HW or UWs is already correctly manifested and the licensed transporter is scheduled for pick up of HW or UWs at JBLE - Eustis.

G. Disposal: All HW, UW, or NHW turn-ins or shipments must be coordinated with the HWAF IAW EMP 4.4.6.8.1.

H. Manifest Signature Authority. Only personnel authorized in writing by the Air Base Wing Commander can sign hazardous waste manifests, non-hazardous waste manifests, or bills of lading for non-hazardous waste. Activities must submit a list of personnel seeking authorization in writing as of January each year. This authorization is good for one calendar year only. Activities must ensure all training requirements are up-to-date or remove personnel from the list and notify CEIE immediately.

(1). Must have Advanced Environmental Management (AEM) and DOT "HazMat Employee" training IAW EMP 4.4.2.

(2). In addition, must have at least 4 hours of training on Land Disposal Restrictions (LDRs).

I. Develop a Hazardous Waste Minimization (HazMin) Plan to actively manage the Activity's Hazardous Wastes, Universal Wastes, and Non-Hazardous Wastes.

(a). HazMin Plan must be:

i. Reviewed and updated at least annually by the AEC.

ii. Signed by the Commander or Director having AEC appointment authority.

iii. Maintained at each TSS, SAS, or NHS with the Functional Area Continuity Book (FACB).

iv. Must be available for waste site pickup, announced, and unannounced inspections.

(b). The purpose of the HazMin Plan is to:

i. Reduce the volume of wastes being generated.

ii. Reduce the Toxicity of wastes being generated.

iii. Reduce the amount of Hazardous Materials utilized.

(c). The HazMin Plan will include:

i. Reductions Goals:

a. Reduce HW, NHW, & UW 20% by 2020.

b. Interim reduction by CY18, 15 % reduction.

ii. Measures to Reduce the amount of Hazardous Materials (HMs) being utilized by:

a. Maintaining a list of HMs being used.

b. Referencing specific citations requiring the usage of the HMs.

c. Evaluating and substituting less toxic products for each HM.

d. Minimizing the purchasing and overstocking stocking of HMs.

e. Redistribution of over stocked HM to reduce waste generation.

iii. Evaluating and tracking of waste steam generation by:

a. Maintaining a list of wastes being generated.

b. Annual coordination with the HWAF to validate Activity's Waste annual generation for the previous calendar year.

c. Comparing the volume of each waste generated for the most recently completed calendar year to the previous calendar year. Use EMP 4.4.6.8.1 Tab 4 Container Turn-in Log FEVA Form 32-696 for this comparison and reconciliation with HWAF numbers.

d. Maintaining a chart to track trends and identify opportunities to reduce waste generation. Chart should track 3 at least calendar years. The reason for increasing waste generation from one year to the next must be cited.

iv. Methods to evaluate changes in operations and processes to reduce waste generation.

J. Clean Soil Program (CSP): See EMP 4.4.6.8 Tab 3 Installation Clean Soil Program

(1). As a minimum, all projects that involve any of the actions in paragraph (2) below must be IAW EMP 4.4.6.16 Tab 1 JBLE-Eustis Assessment Management Special Conditions and Affirmative Procurement paragraph 20.

(2). The soils associated with JBLE-E Activities must be controlled to prevent inadvertent movement of contamination either on, off, or to new areas of the installation. Any projects on JBLE-E, which involves any of the foregoing action categories listed below, must be coordinated and approved by the CE PM and the CEIE. The contractor will prepare a Soil Management Plan (SMP) for this process. The contractor is responsible for all associated costs. These categories include, but are not limited to:

- Soil removed from a project site and taken off the installation
- Soil moved to the project site from off the installation
- Soil removed from a project site and moved to a new installation location
- Soil moved to the project site from another installation location
- Soil disturbed on site as part of a project and remains on the project site

NOTE: <u>UNDER NO CIRCUMSTANCES</u> will soil be brought onto the Installation, removed from the Installation, or relocated on the Installation without prior written approval by the CEIE.