U. S. AIR FORCE

HAZARDOUS WASTE MANAGEMENT PLAN

JBLE-EUSTIS

15 April 2020

ABOUT THIS PLAN

This installation-specific Environmental Management Plan (EMP) is based on the U.S. Air Force's (AF) standardized Hazardous Waste Management Plan (HWMP) template. This plan is not an inventory of all hazardous waste (HW) requirements and practices. Where appropriate, external resources, including Air Force Instructions (AFIs); AF Playbooks; and federal, state, local, and permit requirements, are referenced.

Each section of this plan begins with standard language that addresses AF and the Department of Defense (DoD) policy and federal requirements. The standard language is restricted from editing to ensure consistent application across the AF enterprise. The approved communication is maintained by the Air Force Civil Engineer Center (AFCEC) designated Subject Matter Expert (SME) for this plan.

Immediately following the standard text are installation-specific sections that address state, local, and installation-specific requirements and processes. Installation sections are maintained and updated by the installation HW Program Manager or the AFCEC Section appointed to support this installation.

This document is optimized to be accessed and viewed electronically on the installation and AF eDASH website, the primary communication tool for AF EMPs.

Table of Contents

DOCUMENT CONTROL 4
Standardized HWMP Template 4
Installation HWMP 4
1.0 OVERVIEW AND SCOPE 6
2.0 INSTALLATION PROFILE 7
3.0 ENVIRONMENTAL MANAGEMENT SYSTEM 8
4.0 ROLES AND RESPONSIBILITIES 8
Installation Supplement – General Roles and Responsibilities 9
5.0 TRAINING 16
Installation Supplement – Training 16
6.0 RECORDKEEPING AND REPORTING 17
Installation Supplement – Recordkeeping and Reporting 19
7.0 PROCEDURES 22
7.1 Waste Inventory 22
7.2 Waste Identification 25
Installation Supplement – Waste Identification 25
7.3 Container Management 27
Installation Supplement – Container Management 28
7.4.Labeling and Marking 33
7.5 Accumulation Area Management 34
Installation Supplement – Accumulation Area Management 35
7.6 Transportation 41
Installation Supplement – Transportation 42
7.7 Turn In/Disposal 46
Installation Supplement – Turn In/Disposal 46
7.8 Inspection 50
Installation Supplement – Inspection 50
7.9 Waste Minimization 52
Installation Supplement – Waste Minimization 53
7.10 Preparedness and Prevention 54
7.11 Waste Specific Procedures 54

Installation Supplement – Waste Specific Procedures **54**
8.0 REFERENCES **55**
9.0 ACRONYMS **55**
10.0 DEFINITIONS **56**
APPENDICES **56**
Appendix A – Waste Analysis Plan **57**
Appendix B: HW Inventory **64**
Appendix C: HWAF Site Evaluation Pickup Checklist FEVA Form 32-641 ..... **78**
Appendix D: Container Contents Log (CCL) FEVA Form 32-646 ..... **85**
Appendix E: HWAF REINBURSABLE LOG FEVA Form 32-690 ..... **87**
Appendix F: Monthly Universal Waste Site Inspections FEVA Form 32-695 ..... **89**
Appendix G: Container Turn-In FEVA Form 32-696 ..... **90**
Appendix H: Waste Description Log (WDL) FEVA Form 32-697 ..... **91**
Appendix I: Weekly TSS, SAS, and NHS Inspections FEVA Form 32-698 ..... **95**
Appendix J: TSS, SAS, and NHS Site Approval FEVA Form 32-699 ..... **96**
Appendix K: EMERGENCY NOTIFICATION FEVA Form 32-700 ..... **99**
Appendix L: Site Pickup Evaluation/Inspection Check List **100**

DOCUMENT CONTROL

Standardized HWMP Template

In accordance with (IAW) the AFCEC Environmental (CZ) Business Rule (BR) 08, *EMP Review, Update, and Maintenance*, the standard content in this HWMP template is reviewed periodically, updated as appropriate, and approved by the HW SME.

This version of the template is current as of 10/03/2018 and supersedes the 2015 version.

NOTE: Installations are not required to update their HWMPs every time this template is updated. When it is time for installations to update their HWMPs, they should refer to the eDASH EMP Repository to ensure they have the most current version.

Installation HWMP

The initial HWMP must be approved and signed by the Installation Commander (at the time of publication) as the legal HW Generator for the Environmental Protection Agency (EPA) ID assigned to this installation. After that, the plan must be reviewed and approved annually by the Environmental Management System (EMS) Cross-Functional Team (CFT) and updates/changes noted below. NOTE: This is not a Wing Contingency Plan and is not governed by installation or Wing plans or readiness format or coordination requirements of AFI 10-401, *Air Force Operations Planning, and Execution*. It is governed by AFMAN 32-7002, *Environmental Compliance and Pollution Prevention,* Chapter 5, Section 5.2. *Hazardous Waste Management Plan*.

Record of Updates – The HWMP is updated as changes to waste generation and management practices occur, including those driven by changes in applicable regulations and approved by the installation HW Program Manager as the plan Office of Primary Responsibility (OPR).

Record of Updates

Change No.	Nature of Change	Date of Change	Approved By:

Record of Annual Review – IAW AFMAN 32-7002, *Environmental Compliance and Pollution Prevention,* Chapter 5, Section 5.2., this plan is reviewed annually by the EMS CFT. Formatting and administrative changes should be noted in the above record of updates as approved by the EMS CFT Chair and do not require Installation Commander or Environmental, Safety, and Occupational Health Council (ESOHC) approval. Substantive revisions require coordination and approval by the Installation Commander as determined by the EMS CFT Chair and/or IAW host installation procedures.

Record of EMS CFT
Annual Review

Review Date	EMS CFT Chair	Notes/Remarks
09April 2020	Keith Morrow	ESOHC Approved/Noted in ESOHC Meeting Minutes

1.0 OVERVIEW AND SCOPE

This HWMP contains procedures for the management of HW. In lieu of federal or state requirements, AFMAN 32-7002, *Environmental Compliance and Pollution Prevention,* Chapter 5, Section 5.2., acts as the main driver for the HWMP. The HW Playbook serves as supplemental guidance to this plan.

Installation Supplement – Overview and Scope

Letter of Instruction:

- This HWMP is for use by all activities (including tenants) that generate solid and potentially hazardous waste or who may store HW within the contiguous Joint Base Langley Eustis (JBLE)-Eustis property. Procedures and policies outlined in this plan are designed to meet the needs of Generating Activities (GAs) and to facilitate compliance with all applicable federal, state, and local laws governing HW management. The plan is effective once signed. From that day forward, all GAs will fully comply with the plan and its contents.
- Compliance with this plan helps protect the environment, the health of everyone at JBLE- Eustis and in the local community. Failure to fully comply with this plan at all times could result in federal or state regulatory action requiring the substantial expenditure of United States Air Force (USAF) resources and possibly criminal prosecution of the individuals responsible for noncompliance.
- The success of JBLE-Eustis HW management program depends on team effort and total dedication from all parties involved. Therefore, efforts shall be focused on doing what is smart, what is right, and, more importantly, what is lawful to achieve and maintain compliance with all laws governing HW management.

The goals of the JBLE-Eustis HWMP are to:

- Conduct all HW management activities in a manner that will protect the health and welfare of USAF personnel and the general public.
- Comply fully with all applicable federal, state, local, and AF laws and regulations governing HW management.
- Reduce the generation of HW through source reduction to the maximum extent possible.
- Recycle wastes where possible and practicable.
- Reuse materials and wastes to the maximum extent possible.
- Ensure that all used and unused hazardous materials are safely handled, accounted for, and controlled by every activity handling such materials.
- Dispose of HW through methods of treatment that result in the destruction of toxic constituents whenever possible, rather than by landfilling or other methods of land disposal.
- Budget to reduce future operations, maintenance, and HW disposal fund expenditures.
- Reduce present and future liabilities.

- Protect and enhance the environment.

2.0 INSTALLATION PROFILE

Installation Profile

Scope of Plan	Applicability of State Requirements. The federal government, through the Environmental Protection Agency (EPA), authorizes the states to assume responsibility, or primacy, for the implementation and enforcement of the HW management program, provided that states desiring to do so establish HW management regulations at least as stringent as the federal requirements. The Commonwealth of Virginia issued its HW management regulations in November 1980. With some relatively minor exceptions, the Commonwealth of Virginia incorporated the federal regulations regarding HW management. Current USAF policy regarding the management of HW, explained in AFMAN 32-7002, *Environmental Compliance and Pollution Prevention,* Chapter 5, Section 5.2., Waste Management is that generation of HW will be minimized to the fullest extent possible, and that which is generated will be managed and disposed of IAW all applicable federal, state and local laws and regulations.
OPR	733d Civil Engineer Division (733 CED) Installation Management Flight has overall responsibility for implementing the HW management program and is the lead organization for monitoring compliance with applicable federal, state, and local regulations.
HW Program Manager	Paul A James 733 CED/CEIE, 757-878-7362
Alternate HW Program Manager	Vacant
Emergency contacts	Fire Department 757-878-1008, Emergency 911, Emergency Medical Care 911, Refer to Appendix B for additional contact information
Waste registration numbers	EPA ID # VA8213720321
HW generator status	Large Quantity Generator
Universal waste handler status	JBLE-Eustis manages UW IAW RCRA
Permitted HW operations	N/A
Federal regulatory references	40 Code of Federal Regulation (CFR)
State and local regulatory agencies	Virginia Department of Environmental Quality (DEQ)
State and local regulatory references	Virginia Administrative Code 9VAC20-60

Approved HW disposal contractors	Defensive Logistics Agency (DLA)
HW accumulation sites	Building 1208
HW accumulation time limits	90 Day
HW generator reporting frequency	Biennial Report to EPA.

3.0 ENVIRONMENTAL MANAGEMENT SYSTEM

The AF environmental program adheres to the EMS framework and its Plan, Do, Check, Act cycle for ensuring mission success. U.S. Department of Defense Instruction (DoDI) 4715.17, *Environmental Management Systems,* AFI 32-7001, *Environmental Management*, and International Organization for Standardization (ISO) 14001, *Environmental management systems - Requirements with guidance for use*, guide how environmental programs should be established, implemented, and maintained to operate under the EMS framework.

The HW management program employs EMS-based processes to achieve compliance with all legal obligations and current policy drivers, effectively manage associated risks, and instill a culture of continuous improvement. The HWMP serves as an administrative, operational control that defines compliance-related activities and processes.

4.0 ROLES AND RESPONSIBILITIES

The significant roles/organizations involved in supporting the HW program include:

- Wing/Installation Commander
- ESOHC
- HW Program Manager/Alternate
- Shop/HW Generator Personnel
- Satellite Accumulation Site (SAS) and Hazardous Waste Accumulation Facility(HWAF) Supervisors/Managers
- Unit Commanders
- Unit Environmental Coordinators (UECs), see AFI 32-7001 for role description
- Contracting Officer
- Defense Logistics Agency (DLA) Disposition Services
- Tenant Organizations
- AFCEC

Detailed information about typical responsibilities for these and other roles is available in AFMAN 32-7002, *Environmental Compliance and Pollution Prevention,* Chapter 5, Section 5.2., applicable installation supplements, and the HW Playbook. Additional HW management-related roles and responsibilities are described throughout this plan and in referenced documents.

Installation Supplement – General Roles and Responsibilities

JBLE-Eustis

HW management requires the full involvement of all organizations on JBLE-Eustis, including contractors and tenants.

JBLE-Eustis Employees

It is each employee's responsibility to ensure that all HW are adequately managed and disposed of. Although it may not be necessary to set up HW accumulation points for every workplace where HW is generated (there are less stringent requirements for the management of universal fluorescent lamps, batteries and infrequently generated expired hazardous materials), it is important the procedures of this plan be followed to ensure proper management and disposal procedures.

The proper handling of HWs is an essential part of your job. For many years improperly handled hazardous materials and wastes have resulted in property damage, a threat to public health and the environment. As a result, Congress and the Commonwealth of Virginia have passed environmental laws and regulations to control the use, storage, disposal, and treatment of HW and other regulated materials. JBLE- Eustis is required to comply with these federal, state and local laws and regulations. Also, we must comply with DoD, AF, and Air Force Civil Engineer Center (AFCEC) regulations and guidance.

Liability associated with mismanagement of HW, along with the rising costs of management and disposal, requires a management approach that transcends the standard chain of command. CEIE is the OPR for HW management. Other organizations provide compliance oversight, analytical support, and different types of services in support of this HWMP. Ultimately, Gas (Government Activities), hosts, tenants, and contractors bear the bottom-line responsibility for ensuring that their HW-generating and management functions are conducted in full compliance with this plan.

Contractors Performing Work at JBLE-Eustis

Contractors performing work at JBLE-Eustis are subject to this HWMP. They must ensure that all wastes are correctly identified, stored, and disposed IAW federal, state, and local regulations and the provisions of their contract. Contractors generating and storing RCRA HW must coordinate with the 733 CED/CEIE on identification of and locations of all HW generated at JBLE-Eustis. The 733 CED/CEIE must sign all HW, and asbestos manifests for off-base transportation of HW. In case of issues arising between the Government and the contractor as to compliance with this paragraph, contact the applicable 633 CONS contract administrator or contracting officer on the specific contract. In the case of contracts awarded and administered by other than 633 CONS (such as US Army Corps of Engineers), contact appropriate personnel within that organization.

Specific Responsibilities

Civil Engineer Division (CED); Environmental (CEIE) will:

- Manage the Installations Hazardous Waste program.

- Operate a centralized Hazardous Waste Accumulation Facility (HWAF) IAW this plan.

Chief, Compliance Branch:

- CEIE Compliance Branch Chief is responsible for all aspects of environmental management related to compliance which includes but is not limited to, hazardous waste, air quality, asbestos, and lead paint, PCBs, spill prevention, affirmative procurement, wastewater, and stormwater.

Hazardous Waste Program Manager (HWPM):

- Responsible for Resource Conservation & Recovery Act (RCRA) compliance. Accountable for ensuring JBLE-Eustis complies with all applicable Federal, State, local, and Air Force laws, instructions, manuals, and policies about the identification, storage, transportation, and disposal of hazardous wastes. Reviews, updates, and coordinates local hazardous waste regulations and plans. Develops, updates, and conducts hazardous waste training. Provide technical and compliance guidance concerning hazardous waste requirements to Commanders, Directors, and subordinate personnel to include unit/activities inspections and professional assistance visits.

Hazardous Waste Accumulation Facility (HWAF) Operations Officer:

- Responsible for HWAF operations, including Contract Officer's Representative (COR) for HWAF and Used Oil contracts. Accountable for ensuring HWAF compliance with all applicable Federal, State, local laws and Air Force instructions, manuals, and policies on the identification, storage, transportation, and disposal of HWs, UWs, and NHWs.
- Coordinates with the Hazardous Waste Program Manager on policy and regulatory matters to ensure compliance.
- Coordinates with the HWAF Manager to ensure smooth operations of the HWAF.
- Ensures that the HWAF Functional Area Continuity Books are reviewed annually and are up to date.
- Ensures quality assurance of pending shipments utilizing advance copies of delivery orders are accomplished.
- Ensures waste shipments are made within the regulatory 90-day time-frame.
- 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.
- Ensures all shipping documents are prepared correctly and on time.
- Ensures all required documents and facilities are prepared for external inspectors (Local, State Federal).
- Ensures all site Inspections (Self-Audits) of the HWAF are accomplished on time.
- Ensures all shipping documents are processed and ready for data entries within 25 days of the shipment.
- Coordinates the funding obligation for the collection of used oil, and off-specification fuel is accomplished.

- Ensures used oil and off-specification fuel from the activities meet all regulatory standards.
- Coordinates unique collection of used oil from buildings being demolished is for tanks being filled in place.
- Conducts used oil quality assurance at least once a quarter.
- Maintain good customer relations by:
  - Responding to all telephonic inquiries relating to compliance issues.
  - You are responding to all inquiries relating to compliance issues while on-site visits.
  - I am assisting Activity personnel in preparing for any inspections.

HWAF Operations Manager:

- HWAF Operation Manager manages all operations of the HWAF.
- Coordinates with the Hazardous Waste Program Manager on policy and regulatory matters to ensure compliance.
- Ensures waste shipments are made within the regulatory 90-day time-frame.
- Ensures all supply requirements are correctly identified, and proper documents are prepared and submitted for the continual operation of the facilities, also ensure that funds are obligated promptly.
- Maintain good customer relations by:
  - Responding to all telephonic inquiries relating to compliance issues.
  - Responding to all inquiries relating to compliance issues while on-site visits.
  - Assisting Activity personnel in preparing for any inspections.
- Ensures that the HWAF Functional Area Continuity Books is up to date by assisting the HWAF Operations Officer.

Activity Environmental Coordinator (AEC):

- The AEC is the single point of contact for all activity environmental matters. The AEC is the Commander's, Director's or Leader's environmental technical advisor and representative to the installation. Ensures environmental activities comply with all DOD, USAF, JBLE, and JBLE-Eustis regulations, instructions, manuals, and policies. Provides management oversight and assistance to the activity's Unit Environmental Coordinators (UECs), Hazardous Waste Coordinators (HWCs), Hazardous Materials Managers (HMMs), Building Recycling and Energy Monitors (BREMs), and Recycling Coordinators (RCs).
- Major responsibilities:
  - Keep the activity's chain of command informed on all environmental matters.
  - Coordinates communications between CEIE and the activity.
  - Maintains the mandatory AEC Functional Area Continuity Book (FACB) at each activity site.
  - Ensures internal Environmental Management training and inspections are accomplished IAW established time frames.
  - Maintains an operation and facility inventory.
  - Ensures environmental data is reported to CEIE within the required timeframes.

- Ensures environmental records are kept for at least 3 years.
- Conducts quarterly Environmental Multimedia Assessments of all subordinate activities.
- Has a system to track all training and inspections conducted by the activity and its subordinates.
- Serves as the activity's Energy and Natural Resources Coordinator.
- May act on behalf of an activity's UECs or HWCs.
- Ensures the appointment of subordinate level UECs, HWCs, HMMs, BREMs, RCs, and other activity environmental staff as appropriate.
- Assists the subordinate AECs, UECs, HWCs, HMMs, BREMs, and RCs in managing their environmental responsibilities.
- Ensures the Hazardous Material Management program for their activities is correctly managed.
- Coordinates new missions, new operations, construction, renovation, new system/equipment deployment, further system/equipment testing and evaluation, and training/exercise actions with CEIE to determine the level of environmental impact assessment and subsequent environmental documentation required.
- Signs and certifies on the Waste Description Log (WDL).
- Signs the sworn certification on the Container Content Log (CCL) when wastes are being turned-in.
- Coordinates with CEIE the registration of all personnel being assigned as AECs, UECs, and HWCs by his/her activity. Ensure all FEVA Form 32-643 forms are correctly completed and turned-in by the published suspense date for each class.

Unit Environmental Coordinator (UEC):

- Duty Description: The UEC is the single point of contact for Unit level environmental matters. The UEC is the Commander's or Leader's environmental technical advisor. Ensures the Activity's compliance with all DOD, USAF, JBLE, and JBLE-Eustis regulations, instructions, and policies.
- Major Responsibilities:
  - Keeps the Unit's chain of command informed on all environmental matters.
  - Coordinates communications between the AEC and the Unit.
  - Maintains the HM Functional Area Continuity Book (FACB)
  - Coordinates Unit information with the AEC to assist the AEC is keeping Activity Facilities and Operations Inventory FEVA Form 32-600 up to date.
  - Ensures appointment, training, management oversight, and assistance to the Unit's Universal Waste Handlers (UWHs), Hazardous Materials Managers (HMMs), Building Recycling and Energy Monitors (BREMs), Recycling Coordinators (RCs), and Hazardous Materials Handlers (HMHs).
  - Maintains a system to track all inspections conducted at the Unit level and resolve findings.
  - Maintains training and inspection files for at least 3 years.
  - Ensures the Unit's Hazardous Material Management program is meeting all requirements.
  - Approves All Hazardous Materials requests being submitted by the Unit either

manually or using EESOH-MIS before sending it to the HazMart.
  - Inspects HM and UW sites monthly within 30 calendar days.
  - Certifies HazMart approvals and purchases.
  - Maintains the Unit's Energy and Natural Resources conservation program.
  - Coordinates new missions, new operations, construction, renovation, new system/ equipment deployment, further system/equipment testing, and evaluation, and training/exercise actions with the AEC.

Hazardous Waste Coordinator (HWC):

- The HWC manages the waste accumulation sites for the Activity or Unit. Assumes accountability for proper identification, classification, packaging, labeling, marking, storage, record keeping, transportation, and reporting requirements. Ensures the Unit's compliance with all DOD, USAF, JBLE, and JBLE-Eustis regulations, instructions, and policies. When the Unit does not have a UEC, assumes the duties as the UEC. The HWC is the Commander's or Leader's HW manager and technical advisor.
- Major Responsibilities:
  - Keeps the Unit's chain of command informed on all HW and other environmental matters as required.
  - HWC manages the waste accumulation sites, Temporary Storage Sites (TSSs), Satellite Accumulation Sites (SASs), and Non-Hazardous Sites (NHSs).
  - Maintains the HW Functional Area Continuity Book (FACB).
  - Inspects TSSs, SASs, and NHSs weekly within 7 calendar days.
  - Inspects UW sites monthly within 30 calendar days.
  - Ensures turn-ins of HWs & UWs is accomplished within the appropriate time limitations.
  - Coordinates communications between the AEC and the Unit.
  - Establish a system to track all inspections conducted at the Unit level and resolve findings.
  - Maintain training and inspection files for at least 3 years.

Building Recycling and Energy Monitor (BREM):

- The BREM is the building's or facility's point of contact for recycling, energy, and natural resources conservation. The BREM will maintain and ensure that the Activity's recycling, energy, and natural resources conservation program is implemented at their buildings or facilities.
- Major Responsibilities:
  - Serves as the POC for all building or facility energy and natural resources conservation issues.
  - Serves as the POC for all building or facility recycling and solid waste issues.
  - Keeps building occupants and UEC informed on all recycling, energy, and natural resources conservation.
  - Coordinates communications between his/her building or facility and the UEC.
  - Ensures that recyclables and Solid Waste are correctly managed and ready for pickup.

  - Ensures that recycling and Solid Waste areas are neat and orderly.
  - Coordinates with the Solid Waste Recycle Center (SWRC) for specific procedures.

Recycling Coordinator (RC):

- The RC is the point of contact for recycling. The RC will ensure that recyclable materials are properly managed.
- Major Responsibilities:
  - Serves as the POC for recycling and solid waste issues.
  - Keeps occupants and BREM informed on all recycling and solid waste matters.
  - Coordinates communications between his/her building or facility and the BREM.
  - Ensures that recyclables and Solid Waste are correctly managed and ready for pickup.
  - Ensures that recycling and Solid Waste areas are neat and orderly.

Hazardous Waste Handlers (HWH):

- All individuals having assigned duties that involve handling HWs. These duties may include but are not limited to HW generation, and assisting the AEC, HWC, or HWS in the proper identification, classification, packaging, labeling, marking, storage, record-keeping, transportation on-post, and reporting requirements, moving, transferring, inspecting.
- Major Responsibilities:
  - Keeps the Unit's HWC informed on all HW and other environmental matters as required.
  - Ensures Units turn-ins of HWs & UWs to the HWC are accomplished within the appropriate time limitations.

Universal Waste Handler (UWH):

- All those individuals have duties that involve handling or managing UWs.
- Major Responsibilities:
  - Keeps the Unit's HWC informed on all UW and other environmental matters as required.
  - Ensures turn-ins of UWs are accomplished within the appropriate time limitations.

Action Activities:

- Commanders/Directors ensure the integrity and safeguarding of HWM records.
- Commanders/Directors sign all documents in the absence of an AEC. This action cannot be delegated to subordinates.
- Comply with all HWM and UWM requirements at all times. Mismanagement of Hazardous Materials or UW may be considered an illegal HWM activity.
- Ensure AECs are trained before assuming any AEC duties. AECs may act on behalf or in place of HWCs.
- Ensure HWCs are trained before assuming any HW duties.

- All services offered by the HWAF must be scheduled and coordinated.

Defense Logistics Agency (DLA)

- Disposes of HW IAW DLA policy, AFMAN 32-7002, *Environmental Compliance and Pollution Prevention,* Chapter 5, Section 5.2., the procedures outlined in this HWMP, Department of Transportation (DOT) and Environmental Protection Agency (EPA) regulations.
- Assumes accountability for all HW accepted from the HWAF accumulation site for off-base disposal.
- Arranges transportation and disposal for off-site shipments of waste. Ensures that disposal contractors comply with all state and federal HW transportation/disposal regulations.
- Provides guidance on filling out HW turn in documentation and ensures the documentation is complete.
- DLA contractor returns original manifests to the 633 CES/CEIE HW program manager.

Public Affairs Office (PAO)

- Handles information on a HW incident/accident.
- Prepares news releases for the media explaining the nature of HW incidents and coordinates news releases with the 633 ABW/CC, the 633 MSG/CC (other group commanders will be notified if applicable), 733 MSG/CC, 733 CED and Staff Joint Staff Joint Advocate (SJA).
- Informs the community about what is actually done with any HW incident, including information on the type of material involved, dangers involved, and measures taken to control the problem.
- Answers all inquiries from media representatives.

SJA

- Reviews all HW contracts, spill reports notifications, and press releases.
- Keeps a copy of environmental laws and regulations, remains abreast of any changes, and provides an interpretation of any new requirements.
- Informs CEIE on legal precedents concerning generation, storage, disposal, and manifesting of HW.
- Advises CEIE on notices of violations and compliance agreements.

Fire Emergency Services

- Coordinates with CEIE, Post Safety for approval to establish NHWS, SASs, and TSSs (Less than 90-day Accumulation Sites).

Safety

- Coordinates with CEIE, and Fire and Emergency Services for approval to establish TSSs, SASs, and HWAF/90-day accumulation sites. Reviews Hazardous Material request in EESOH-MIS, which limits GAs access to products with constituents that would result in the creation of HW.

5.0 TRAINING

HW awareness training is provided to satisfy regulatory requirements and needs. All personnel whose work involves HW, and their immediate supervisors, must successfully complete HW training appropriate to their job responsibilities. Until the employee has received the necessary HW training, the employee may only handle HW under the supervision of a trained individual. HW training is provided by authorized personnel. Training records are maintained IAW the Recordkeeping and Reporting section of this plan. HW Program Managers require specific training to include HW Management Compliance Training and Department of Transportation training to sign HW manifests. Consistent with the eDASH training matrix, Installation HW Program Managers should complete the following in-residence courses (or equivalent): Air Force Institute of Technology (AFIT) 521, Hazardous Waste Management; and DLA - DCPSO00510, Transportation of Hazardous Material/Hazardous Waste (Interservice Environmental Education Review Board [ISEERB] approved). Installations will enter procedures regarding site-specific training requirements below based upon Federal, State, and local regulations, consistent with the eDASH training matrix.

Installation Supplement – Training

JBLE-Eustis Policy:

HW Training Requirements

Personnel for which training is mandatory.

- Per 40 CFR 262.17 (a)(7), and corresponding AFMAN 32-7002, *Environmental Compliance and Pollution Prevention,* Chapter 5, section 5.6, subsection 5.6.1. Training, HW management training is required for personnel who handle HW at facilities that fit into any of the following categories:
  - HWAF
  - HW sites:
    - TSS
    - SAS
  - Emergency response organization that may respond to the HW incident.
- In addition to personnel identified above, all JBLE-Eustis personnel and their supervisors who perform any of the following tasks must receive HW training:
  - Deciding which wastes are HW.
  - Adding HW into accumulation containers or tanks at accumulation points.

  - Removing HW from accumulation tanks or containers.
  - Transporting HW to or from accumulation points.
  - Responding to spills, fire, or explosion, involving HW.
  - Completing HW manifests, annual reports, or exception reports.
  - Inspecting HW accumulation points.
  - Operating an accumulation point.
  - Conducting any tasks involving occupational exposure to or which require management of HW such as collecting HW samples.
- Training Frequency. All personnel described above must successfully complete initial and refresher of the required training. New personnel must complete training within three months after their assignment to a position involving the handling or management of HW. Until that time, and personnel may handle HW only under the supervision of a trained individual as outlined in AFMAN 32-7002, *Environmental Compliance and Pollution Prevention,* Chapter 5, section 5.6, subsection 5.6.1. Facility personnel identified in this annex must take part in an annual review of the training program.
- There are three general components to the training required by RCRA in 40 CFR 265.17. Personnel must be trained on:
  - How to perform their duties in a way that ensures JBLE-Eustis compliance with HW regulations.
  - HW management procedures, including contingency plan implementation.
  - How to respond to emergencies involving HW.

Competency Training:

- All personnel that has positions or duties with potential to affect the environment are required to have competency training to meet the requirements of their primary job functions and any additional responsibilities they are assigned.

Requirements:

- Personnel appointed to key Activity environmental positions must complete training IAW EMP 4.4.2.
- Other positions and duties that require specific training include, but are not limited to, those listed in EMP 4.4.2 and must ensure training is completed and applicable certifications are maintained.
- Unless specified otherwise, training will be conducted IAW EMP 4.4.2.

6.0 RECORDKEEPING AND REPORTING

Recordkeeping

The installation complies with the following U.S. Federal HW recordkeeping requirements as applicable based on generator status.

<u>Summary of HW Recordkeeping Requirements</u>

Record *	Citation	Retention Time**	Citation
HW determination documentation	40 CFR 262.11(f)	3 years from the date that the waste was last sent to a TSDF	40 CFR 262.11(f)
HW Biennial/Annual Report	40 CFR 262.41	3 years from the due date of the report	40 CFR 262.40(b)
HW manifest (electronic or paper)	40 CFR 262.20	3 years from the day the waste was accepted by the initial transporter	40 CFR 262.40(a)
Small Qty HWAS inspection logs	40 CFR 262.16(b)(2)(iv)	Although records are not formally required, the best management practice is to record and retain for 3 years to demonstrate compliance	N/A
Large Qty HWAS inspection logs	40 CFR 262.17(a)(1)(v) 40 CFR 264.15(d) 40 CFR 265.15(d)	For interim and permitted operations, 3 years from the date the inspection was conducted. For all other LQGs, the best management practice is to retain for 3 years to demonstrate compliance	40 CFR 265.14(d) 40 CFR 265.15(d)
Preparedness and prevention arrangements with local authorities	40 CFR 262.16(b)(8)(vi)(B)	The federal regulations do not offer a minimum retention time, but the best management practice is to retain the plan while active and for 3 years thereafter to demonstrate compliance	N/A
Consolidation of HW received from very small quantity generators.	40 CFR 262.17(f)	3 years from the date the HW was received from the very small quantity generator	40 CFR 262.17(f)
Exception reports	40 CFR 262.42	3 years from the due date of the report	40 CFR 262.40(b)
Land restricted waste determination	40 CFR 268.7(a)(1)	3 years from date, the determination was required to be conducted. If not required, 3 years from the date the waste was last sent to a TSDF	40 CFR 268.7(a)(8)
Land restriction notice and certification	40 CFR 268.7(a)(2)	3 years from the date the waste was last sent to a TSDF	40 CFR 268.7(a)(8)
Notification of intent to export waste	40 CFR 262.83(b)	3 years from the date the HW was accepted by the initial transporter	40 CFR 262.83(i)(1)(i)
Waste export confirmation of receipt and exception reports	40 CFR 262.83(h)	3 years from the date the HW was accepted by the initial transporter	40 CFR 262.83(i)(1)(iii)
Annual report (required of primary exporters of HW)	40 CFR 262.83(g)	3 years from the date the HW was accepted by	40 CFR 262.83(i)(1)(ii)

		the initial transporter	
Employee training records (including appointment	40 CFR	For interim and permitted operations- current personnel: until the closure of the site; Former	40 CFR 262.17(a)(7)(iv)

Record *	Citation	Retention Time**	Citation
letters for key HW personnel)	262.16(b)(9)(iii) 40 CFR 262.17(a)(7)(iv) 40 CFR 264.16(d) 40 CFR 265.16(d)	Personnel: 3 years from the date the individual last worked there. For all other LQGs and SQGs, the best management practice is to retain for 3 years to demonstrate compliance	40 CFR 264.16(e) 40 CFR 265.16(e)

*Permitted Treatment, Storage, and Disposal Facilities (TSDF) comply with recordkeeping requirements established in their HW permit.
**Retention Time may be extended during any unresolved enforcement action or as requested by the EPA. The AF, through the Air Force Records Information Management System (AFRIMS), requires that HW-related reports, documents, studies, HW manifests, and disposal records (including contracts) are destroyed 50 years from the date of the record.

Reporting

The HW Program Manager, and other designated personnel, generate needed reports from the Enterprise Environmental, Safety, and Occupational Health - Management Information System (EESOH-MIS).

Enforcement actions, spills, and inspections are reported via the Enforcement Actions, Spills, and Inspections Environmental Reporting (EASIER) database.

Installation Supplement – Recordkeeping and Reporting

Roles and Responsibilities:

- Chief, Civil Engineer Division Environmental Element (CED/CEIE)
  - Provide overall guidance and direction for environmental documentation.
  - Provide resources to support environmental documentation requirements.
- Commanders/Directors/Leaders of Activities:
  - Provide resources as required for environmental documentation actions.
  - Provide supervision and support to the Activity Environmental Coordinator (AEC) to execute environmental documentation actions.
  - Ensure the integrity and safeguarding of environmental records by establishing a chain of custody for all records for transferring records from the outgoing AEC to the incoming AEC.

Environmental Documentation Procedures.

- Environmental documents are categorized in 3 levels as follows:
  - Level 1 – Documents required by the ISO 14001 standard
  - Level 2 – Documents required to effectively manage the environmental

program. These include but are not limited to:
  - Legal and other requirement documents
  - Environmental Permits
  - Environmental Media Area Management Plans
  - Environmental Management Procedures (EMP)
  - Functional Area Continuity Book (FACB) for Activities or Environmental Program Managers
  - Environmental Action Plans in eDASH
  - Level 3 – Documents that are the "records" of environmental management actions. These include but are not limited to:
  - Permit reports
  - DA required reports
  - Media area testing reports (e.g., Hazardous Waste testing)
  - NEPA documents
  - Training records
- CED/CEIE will maintain a list and the official copy of the environmental documents required by the ISO 14001 standard electronically on eDASH following the Environmental Documentation Guidance. These will include but are not limited to:
  - JBLE Environmental Policy/Commitment Statement (Memorandum).
  - Environmental Aspect Inventory
  - Environmental objectives and targets (Spreadsheets or Slides).
  -
  - Descriptions of the main elements of the EMS are found on the installation's EMS Supplement Pages
  - Documents, including records required by the installation to ensure effective planning, operation, and control processes that relate to its significant aspects.
  - CED/CEIE will review all ISO 14001 required documents annually and update as necessary.
- Environmental Program Managers will maintain a list of required environmental documents and records on the eDASH and Finding Tracking Tool in accordance with the Document Control procedures specified on the eDASH Supplement Page.. A consolidated list will be maintained by the EMS Coordinator. All documents will be reviewed annually and updated as necessary.
- Activities will maintain documents and records as identified by EMPs electronically. The AEC will maintain a master list of documents and locations. All documents will be reviewed annually and updated as necessary. Documentation is subject to inspection during JBLE-Eustis inspections by program managers and EMS Audits.
- Documents will be controlled in accordance with the procedures specified on the JBLE-Eustis Document Control Supplemental Page on eDASH.

Roles and Responsibilities:

- Network Enterprise Center (NEC) provides overall guidance and technical support about the control of documents and records.
- Chief, CED/CEIE

  - Provides guidance and direction to develop procedures and instructions for control of environmental documents
  - Provides resources and assigns responsibilities for the establishment, review, authorization, issue, distribution, and revision of controlled environmental documents and records.
- Commanders/Directors JBLE-Eustis Activities
  - Provide resources as required for control of environmental documents and records.
  - Provide supervision and support to the Activity Environmental Coordinator (AEC) to execute control of environmental documents and records.

- **Spill Reporting**

  - The Incident Commander (IC) ensures that all internal and external notifications are made to local, state, federal, and Joint Base Langley-Eustis authorities in accordance with environmental regulations. Detailed reporting requirements are contained in the ICP (Installation Contingency Plan).
  - The IC (or his designated representative) will complete a Spill Report Form as part of its response actions and will forward this report to Environmental Element (CEIE) by the next working day.
  - CEIE prepares all follow-up written reports based on the information provided in the Spill Report Form:
    - **VDEQ 5** Day Letter when required.
    - Enforcement Actions, Spills, and Inspections Environmental Reporting (**EASIER)** database **within 1 Business Day of the spill.**
    - **AF/A7CAN by telephone/Email immediately not to exceed 1 Business Day if any of the following occur:**
    - Results in injury or loss of life.
    - Results in loss of aircraft or facility.
    - It causes interruption of flying operations.
    - It causes environmental contamination extending beyond installation boundaries.
    - Creates potential of a financial impact exceeding $50,000.
    - Results in or may result in litigation, publicity, or media coverage.
  - **Disposal:** Whenever practical, the spilled substance will be recovered. All non-recoverable material will be disposed of in accordance with this plan.
  - **Post-incident actions:** The IC ensures that all response equipment and supplies used for spill response are cleaned and maintained or replenished. An after-action review with response personnel, CEIE, other installation activities, and the responsible party is conducted to determine the effectiveness of response actions, identify any additional equipment or supply needs, and whether revision of the ICP is needed.
  - **Additional support:** The IC may request additional support during spill response. Support may include manpower and equipment from other installation activities. When response resource requirements exceed the capabilities of the installation, the IC may request contract support in dealing with an incident.

- **Responsible parties:** Activities/organizations, which cause an incident, are referred to as the responsible party. Responsible parties are overall responsible for the incident and are responsible for all response, remediation, clean up, disposal and related costs. This typically includes costs for excavation of contaminated media, containerization and disposal of contaminated sorbents, materials, and media, reimbursement of Fire & Emergency Services Division for consumable spill response supplies, replacement of durable response equipment damaged during the response, remedial actions, and any related contract support.
- **Unidentified responsible party:** Spills, where the responsible activity is not readily identifiable, may be investigated by military police authorities to determine the responsible activity. If the responsible activity cannot be identified, the installation will be responsible for costs associated with clean up.
- **Resources available for all spill responses:** Installation spill response equipment and supplies, and where located, which are available for handling discharges, are listed in the ICP.

7.0 PROCEDURES

This section contains procedures for managing HW from identification, accumulation, offsite transportation, and disposal. The HW Program Manager ensures that appropriate procedures are properly communicated and followed by all necessary personnel.

7.1 Waste Inventory

A current waste inventory can be generated within EESOH-MIS using the Ad-Hoc Reporting Tool or by completing the following steps:

- Log into EESOH-MIS, select the "Reporting" option, and select "Hazardous Waste" to generate the Waste Site Waste Stream Summary Report.

Installation Supplement – Waste Inventory

- GA personnel is responsible for maintaining a current waste stream inventory for all facilities under their control. A waste stream inventory, when adequately compiled and maintained, is an excellent management tool and readily provides sufficient information to ensure that compliance with environmental and other regulations is maintained. Waste stream inventories are also an essential element of any waste minimization program. An inventory will provide both an instant base-level visibility of all HW-generating activities and a useful "yardstick" for measuring the success of waste minimization efforts.
- Appendix D represents a baseline inventory of HW streams on JBLE-Eustis and includes all organizations known to generate HW. GAs must report additions, deletions, or changes to this inventory in writing to CEIE. At least annually, GAs must submit a complete waste stream inventory of all waste streams generated in or around their facilities. Appendix D also shows the locations of SASs, TSSs, and HWAF.

- Many activities at JBLE-Eustis use hazardous materials but do not normally generate HW. Spills or other incidents at such locations may result in waste generation at locations other than those listed in Appendix D. GAs must manage these sites as SASs, as appropriate, when they first generate HW.
- GAs can easily compile monthly data for annual reports to CEIE. Moreover, maintaining a monthly inventory produces accurate results. CEIE offers the form on the following page as a means of tracking your waste inventory.

Generating Activity Waste Inventory Form

Generator: _____ Activity: _____ Name: _____

Office: _____ Symbol: _____

Calendar Month/Year: _____

Bldg. No.	Waste	Quantity	Container	SAS, TSS NWS No.

7.2 Waste Identification

The HW Program Manager determines the nature of waste based on a detailed qualitative analysis of the regulated waste generating process, associated Safety Data Sheet (SDS) information, and coordination with generating activity personnel involved in the use of hazardous materials. If uncertainties about a waste stream exist, the HW Program Manager pursues waste stream sampling and analysis IAW the Waste Analysis Plan (WAP) found in Appendix A.

The WAP details the wastes that have been evaluated and analyzed, a description of the testing and analytical methods used, the HW sampling methods used, the location of samples taken for analysis and frequency, sample documentation, sample quality assurance, and quality control procedures, and sample request procedures.

Generator knowledge and the results of the WAP are used to minimize waste re-characterizations to those instances where a process change has occurred, or the waste stream is highly variable.

Installation Supplement – Waste Identification

Hazardous Waste Management (HWM) - General:

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

- 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 manage hazardous materials or generate the waste.
- 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 correctly ship Hazardous Wastes within 90 days of the Accumulation Start Date (ASD) and Universal wastes within 365 days of the ASD.
- The HWM process includes but is not limited to the following steps:
  - Waste identification
  - Waste classification
  - Containerization and labeling

- Accumulation site management
- Weekly (Not more than 7 Calendar Days) Site Inspections
- Transportation
- Disposal
- Reporting
- Activity maintains copies of all HWM records for 3 years
- Hazardous Waste Minimization (HazMin) Plan

Waste Stream Classification:

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

- The HWAF verifies that the material is an SW and determines if any exceptions or exclusions can apply.
- The HWAF determines if the SW meets the definition of an HW if it meets any of the following criteria:
- It is a listed HW if
  - "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.
  - "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.
  - "F" - Listed: Mostly spent solvents from non-specific sources. Waste codes start with "F," e.g. F001.
  - "K" - Listed: Mostly wastes from specific manufacturing sources. Waste codes start with "K," e.g. K001.
  - Container residues or spill residues from listed wastes.
  - Mixture of SW and a listed hazardous waste.
- It is a Characteristic HW if it exhibits any of the following characteristics (See Glossary for definitions):
  - Ignitability.
  - Corrosivity.
  - Reactivity.
  - Toxicity
  - The mixture of SW and characteristic HW, only if the resulting mixture exhibits a characteristic of an HW.
- If the SW does not meet the definition of an HW and originated from an HM or HC, then it is classified as a Non-Hazardous Waste (NHW).
- The HWAF will match the waste to an existing waste profile or create a new profile.
- 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.

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

- 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.
  - The WDL will include names, quantities, and Stock Numbers (NSNs or LPNs) of HMs used; SDS information; Shop Codes; names and amounts of non-hazardous materials used; and a description of the process used to generate the waste.
  - The WDL will be approved by the HWAF.
  - Activities must plan for an anticipated waste generation before actual waste generation.
  - Before generation: The WDL will 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 are established for the types of waste generated.
  - Post Generation: In addition to the above documentation for the prior generation, laboratory analysis may be required.
  - Generating process knowledge may be used for unused commercial products or when the hazardous constituents from specific processes are well documented.
  - SDS for each HMs will be attached to the WDL.
  - Laboratory analysis will be used in other cases because often, SDS or product specifications are not sufficient to accurately identify wastes.
  - Laboratory analysis will be used for "unknown materials."
- 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 started 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.
- It's the Activity's responsibility to fund for analysis.
  - All purchase requests through contracting or other sources by the Activity for sampling and analysis of waste streams will be coordinated with the CEIE.
  - Sample Plan: A project-specific sampling plan 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.
  - HWAF may secure sampling and analysis for Activities as follows (all costs will be the Activity's responsibility):
    - Sampling and analysis of unknown materials upon request.
    - Sampling and analysis of poorly characterized materials or wastes.
    - 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.
  - CEIE will assist when "abandoned" containers have been reported to the Military Police.

7.3 Container Management

Container management procedures are as follows:

- Containers storing HW must be in good condition and meet transportation and other applicable requirements. "Good condition" means there should be no severe rusting, no sharp-edged creases or dents, no bulging heads, and no severe structural defects.
- Ensure the waste is compatible with the container.
- Use plastic or plastic-lined steel drums for storing corrosive wastes.
- Immediately transfer the contents of a leaking container to another container or over pack into a salvage drum.
- Containers with free liquid on top must be cleaned or over packed in the case of a leak.
- Containers must remain closed at all times except when adding or removing waste. Adequate headspace, 6 inches, must be maintained at all times when filling a container to account for expansion.
- Containers holding HW must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.
- Containers of flammable liquids must be grounded when transferring flammable liquids from one container to the other.

Installation Supplement – Container Management

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

Roles and Responsibilities:

- CED/CEIE:
  - Inspect storage and accumulation areas on a periodic basis to ensure proper container management.
  - Coordinate with other installation organizations having requirements for the storage and accumulation of materials and wastes. These include, but are not limited to:
    - Installation Safety Office.
    - Fire and Emergencies Services.
    - Preventive Medicine and Industrial Hygiene.
  - Report inspection findings to appropriated organizations.
- Activities will:
  - **Inspect and maintain containers for Hazardous Wastes (HW), Non-Hazardous Wastes (NHW), and Universal Wastes (UW) are in good condition and properly stored.**
  - All areas must meet all applicable health, safety, and fire rules and regulations. Personnel should contact the Installation Safety Office and the Fire & Emergency Services for specific requirements.

Procedures

- General:
  - All containers must be labeled appropriately at all times. Proper labeling includes serviceable materials, wastes, recyclable materials, and empty containers.
    - Labels and markings must be replaced if they become damaged or lost.
    - Labels have to remain on containers until they are sufficiently cleaned of residues and purged of vapors to remove any potential hazards. They are sometimes referred to as "DOT or OHSA" empty. Not to be confused with "RCRA" empty.
    - Labels and markings no longer applicable to the contents will be removed, defaced, or painted over to make them unreadable.
    - Containers will be stored in such a manner that allows for easy access to container labels. Under no circumstances should containers need to be moved to read any label or opened to determined container contents.
  - Container usage and storage:
    - 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.
    - A container must always remain closed during storage except when materials are added or removed.
    - A container shall not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.
    - Containers of liquids must not be overfilled. Containers must have 6 inches of headspace to allow for expansion to temperature changes.
    - Containers must be compatible with the wastes being contained.
    - 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.
    - Containers of wastes that are incompatible with other containers of materials or wastes stored nearby will be separated or protected from the incompatible wastes utilizing a dike, berm, wall, or other devices to prevent the mixing of incompatible materials if contents leak or spill.
    - Containers must be kept on pallets if not using containment pallets or "HazMat Storage Buildings" with containment.
    - Containers must be protected from the environment (rain, snow, etc.).
    - 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.
    - Containers of Non-Hazardous 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).

- **Management of Unknown or Abandoned Containers:** ***All Unknown Or Abandoned Containers Will Be Handled With Caution! Do Not Assume That A Label Accurately Reflects Contents!***

  - Immediately, upon discovery or someone reporting an unknown or abandoned container, accomplish the following:

        - If a container is leaking, call 911.
        - If the container is not leaking;
            - Try to identify the contents from markings, labels, etc. Note date, time, and location.
            - Try to identify the owner of the container(s) from the area of responsibility, questioning personnel in the surrounding area, etc.
        - If ownership can be determined, ensure appropriate personnel is notified, and the container is appropriately managed.
        - If ownership cannot be determined, notify the Security Forces Squadron (SFS) Police immediately, who will investigate to identify the owner of the container.
            - The SFS Police will provide CEIE with a copy of their findings.
            - Large containers whose owners cannot be identified will be turned over to DOL as abandon property on the post and will be disposed of. Owners will be responsible for all costs if found.
    - Containers not acted upon immediately (within 4 hrs.) will become the property of the Activity where the container is located.
    - CEIE will provide additional instructions and assistance on a case-by-case basis as required.
    - 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.

- **Empty Containers:**

    - Containers may not be reused for other purposes or disposed of until "DOT or OHSA" empty.
        - RCRA empty containers are not managed as hazardous wastes; however, previously used containers must be:
            - Sufficiently cleaned of residues and purged of vapors to remove any potential hazards before being classified "DOT or OHSA" empty.
            - Containers that are not RCRA or "DOT or OHSA" empty must not be left open to allow their contents to dry or evaporate.
        - Previous labels have to remain on containers until empty.
        - Previous labels must be removed, defaced, or painted over once the container is empty.
    - Empty containers must be labeled individually as "empty" unless the container storage area is designated as a "storage area for empty containers."
    - Containers designated for spills will be labeled "EMPTY" and "FOR SPILL USE ONLY."
    - **Containers of Hazardous Wastes (HWs) and Non-Hazardous Wastes (NHWs):**
        - Only DOT approved containers will be used for waste accumulation. DOT approved containers must be marked with United Nations markings.
        - Containers holding ignitable or reactive wastes shall be located at least 50 feet within the installation's property line.
        - Acquisition of containers and labels:
            - 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.
    - 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.
  - 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.

Container Contents Log (CCL):

- HWAF will:
  - Issue a partially completed CCL for each container issued.
  - Receives the completed CCL during container pickups from TSS, SAS, or NHS.
  - Receives the completed CCL during deliveries of wastes to the HWAF from the Activity.
  - Processes and completes the CCL in preparation for waste disposition.
- Activities will:
  - Maintain a CCL for each container of Hazardous Waste (HW), Non-Hazardous Waste (NHW), or Universal Waste (UW), excluding UW Lamps during accumulation or storage.
  - Turn-in the original completed CCL to the HWAF.
  - Activities not using the HWAF for waste turn-ins using will submit the CCL to the HWAF within 3 days of the shipment along with the other required documents.
  - The HWC or AEC will record the required information on the Container Turn-in Log (CTL) from the CCL during the turn-in or shipping process. See Container Turn-in Log FEVA Form 32-696.
  - Ensure that the labeled container and CCL match for contents and container number for the requested waste. Once on-site, it's the Activity's liability.

Procedures:

ITEMS IN BOLD PRINT ARE TO BE COMPLETED BY THE ACTIVITY BEFORE TURN-IN! <u>NOTE: ITEMS 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 16, & 19 MUST BE COMPLETED BEFORE OR WHEN WASTES ARE FIRST ADDED.</u> Specific blocks of the CCL must be completed as follows:

- Block 1: Container Number: Issued by the HWAF only. **Activities not using the HWAF for waste turn-ins must obtain numbers from HWAF and enter the number.**
- Block 2: Profile Number: Issued by the HWAF only. **Activities not using the HWAF for waste turn-ins must obtain numbers from HWAF and enter the number.**
- Block 3: HWAF Doc Reg. No: Entered by HWAF.

- **Block 4: Generating Activity:** - Enter the "Higher HQ & Battalion & Company" or "Directorate & Division" as applicable.
- **Block 5: Building Number:** Enter the building number of the HW site.
- **Block 6: Authorized Site Number:** The number must be issued by CEIE as part of the site approval process. **The process requires this number!**
- **Block 7: Phone Number:** Enter Activity HWCs phone number.
- Block 8: DOT Proper Shipping Name: Entered or supplied by the HWAF, related to the profile number (Hazardous Material Table- 49 CFR 172-173). **Activities not using the HWAF for waste turn-ins must verify and enter this information with the HWAF before shipment.**
- Block 9: DOT Hazard Class: Entered or supplied by the HWAF, related to the profile number (Hazardous Material Table- 49 CFR 172-173). **Activities not using the HWAF for waste turn-ins must verify and enter this information with the HWAF before shipment.**
- Block 10: DOT ID Number: Entered or supplied by the HWAF, related to the profile number (Hazardous Material Table- 49 CFR 172-173). **Activities not using the HWAF for waste turn-ins must verify and enter this information with the HWAF before shipment.**
- Block 11: DOT Packaging Group: Entered or supplied by the HWAF, related to the profile number (Hazardous Material Table- 49 CFR 172-173). **Activities not using the HWAF for waste turn-ins must verify and enter this information with the HWAF before shipment.**
- **Block 12: Type DOT Container:** Enter the United Nations "UN" markings.
- **Block 13: Size/Volume:** Enter the size or volume of the container.
- Block 14: (14) Waste Description: Entered or supplied by the HWAF, the profile name listed with the profile number. **Activities not using the HWAF for waste turn-ins must verify and enter this information with the HWAF when waste is first added.**
- **Block 15: Accumulation Start Date:** First day, that waste is added to a container in a TSS or when the volume reaches 55 gallons of HW or 1 quart of acutely hazardous waste accumulated in a SAS.
- Block 16: EPA Waste Codes: Entered or supplied by the HWAF, related to the profile number. **Activities not using the HWAF for waste turn-ins must verify this information with the HWAF when waste is first added.**
- Block 17: Origin code: Entered by the HWAF during in-processing at the HWAF. **Activities not using the HWAF for waste turn-ins must verify this information with the HWAF before shipment and enter data.**
- Block 18: Source Code: Entered by the HWAF during in-processing at the HWAF. **Activities not using the HWAF for waste turn-ins must verify this information with the HWAF before shipment and enter data.**
- Block 19: Form Code: Entered by the HWAF, related to the profile number. **Activities not using the HWAF for waste turn-ins must verify this information with the HWAF when waste is first added.**
- **Block 20: Date of Activity:** Each time waste is added to or removed from the container, an entry is required.

- **Block 21: Type of Waste:** A general description of the waste must be shown, e.g., fuel filters, waste oil, waste paint, etc. N**ot the profile name listed in item 14!**
- **Block 22: Process generating waste:** How was the waste-derived, e.g., vehicle maintenance, painting, spill clean-up, etc. M**ust match the written description of the waste.**
- **Block 23: Name of the person adding or removing waste:** The person adding waste to the container must be entered. Should be done under the supervision of the HWC or HWS.
- **Block 24: Weight:** Each time waste is added, estimate the weight in pounds or;
- **Block 25: Volume:** Each time waste is added, determine the volume in gallons.
- **Block 26: Comments:** Used by the activity or HWAF to record any additional information needed.
- **Block 27: Subtotal of additional sheets:** If more than one CCL sheet is needed to record waste accumulation, attach other sheets, and add the total here.
- **Block 28: Container Total:** Add the amounts in either the "pounds" or "gallons" column.
- **Block 29:** Actual Weight by HWAF or SWCC: Containers must be weighed when turned-in to the HWAF or SWCC.
- **Block 30**: **HWC Certification:** The HWC must sign the certification that the contents are true and accurate when ready for disposal.
- **Block 31**: **AEC Certification:** The AEC must sign the certification that the contents are true and accurate when ready for disposal. The AEC may sign in place of the HWC if an HWC is not available. If the AEC is not available or not trained in HWM, the Commander or Director having signature authority for appointing the AEC must sign for the AEC. It cannot be delegated to other personnel.

- The example below is a CCL as the HWAF prepares it and delivered it to the Activity along with an appropriately labeled container. A Blank CCL can be found below for when an Activity needs a CCL for containers not issued by the HWAF.
- Questions concerning the completion of this form should be directed to the HWAF. Any mistakes need to be brought to the attention of the HWAF ASAP.

7.4. Labeling and Marking

Containers used for the accumulation and transportation of HW are properly labeled IAW applicable laws and regulations.

Each container is appropriately marked and labeled from a SAS to HWAS to disposal/turn-in. The waste- generating activity ensures that the label on each waste container is visible for inspection. During accumulation at a SAS, HW containers are marked with the following:

- The words "Hazardous Waste."
- A description of the contents of the container
- The hazards associated with the waste

Once a SAS accumulates more than 55 gallons of HW (or 1 quart of acute HW), the

HWC manager marks the container with the date on which 55 gallons (or 1 quart of acute HW) is exceeded and removes the excess of 55 gallons (or 1 quart of acute HW) within three days.

HW containers 110 gallons or less that are shipped offsite are marked with the following:

- "Hazardous Waste – Federal Law prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency."
- Generator's name and address
- Generator's EPA ID Number
- Manifest Tracking

These markings are:

- Durable
- In English
- Printed on or affixed to the surface of a package or on a label, tag, or sign displayed on a background of sharply contrasting color
- Unobscured by labels or other attachments
- Located away from any other markings that might substantially reduce visibility or effectiveness

Universal waste (UW), or a container in which a UW is contained, is labeled and marked clearly with the date the material became a waste and the name of the waste, as described below:

- UW batteries must appropriately label with any one of the following phrases: "Universal Waste— Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"
- UW thermostats must appropriately label with any of the following phrases: "Universal Waste-Mercury Thermostat(s)," "Waste Mercury Thermostat(s)," or "Used Mercury Thermostat(s)"
- UW pesticides must appropriately label with one of the following phrases: "Universal Waste— Pesticide(s)" or "Waste-Pesticide(s)"
- UW lamps must appropriately label with one of the following phrases: "Universal Waste—Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)"

7.5 Accumulation Area Management

Accumulation area management procedures are as follows:

- SAS's are used to accumulate up to 55 gallons of HW or 1 quart of acute HW
- If HW or acute HW are accumulated more than these amounts, the generator marks the container with the date the value was exceeded and transfers the container to an HWAS or TSDF within 3 days
- HW is accumulated in an HWAS for up to 90 days for a large quantity

generator (LQG), or 180 days (270 days if the waste has to be shipped over 200 miles) for a small quantity generator (SQG)
- HWASs comply with all applicable federal, state, and local accumulation requirements, including proper waste segregation

Installation Supplement – Accumulation Area Management

Roles and Responsibilities:

- Civil Engineer Directorate (CED); Environmental (CEIE) will:
  - Keep an up to date list of all TSSs, SASs, and NHSs.
  - Notify the Virginia Department of Environmental Quality (VDEQ) in advance of accumulating wastes in a new TSS.
  - Coordinate with other installation organizations having requirements for the storage and accumulation of wastes. These include, but are not limited to:
  - 633 ABW Safety Office.
  - Fire and Emergency Services (F&ES) Flight.
  - Preventive Medicine and Industrial Hygiene.
  - Inspect accumulation areas periodically to ensure compliance.
  - Report findings to other appropriated organizations.
- Activities will:
  - Establish, inspect, and maintain storage and accumulation sites Hazardous Wastes (HW), Universal Wastes (UW) except batteries and lamps, and Non-Hazardous Wastes (NHW).
  - Ensure personnel, e.g., AECs, UECs, HWCs, HWSs, and UWHs managing these areas, have the appropriate training.
  - Ensure each TSS, SAS, and NHS will be assigned a primary and alternate HWC.
  - 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.
  - Ensure each accumulation location identified on the on Activity's Facilities and Operations inventory FEVA Form 32-600 will be recognized on a strip map of that area.
  - Ensure that all records are safeguarded against loss or damaged, especially during the change of AECs.

Procedures:

Hazardous, Universal, and Non-Hazardous Waste Accumulation Site Management

- General Requirements for all Hazardous Wastes (HW) and Non-Hazardous Wastes (NHW) Accumulation site:
  - Records: The Commander/Director having AEC appointing authority will establish a chain of custody for all documents and sign for from the outgoing AEC and issue to the incoming AEC.
- Site Locations:

- 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.
- Must have containment insufficient capacity to hold 110% of the most significant volume of a single container.
- Sites will be protected from the elements. Collection of rainwater, HWs, NHWs, or any other materials in the containment unit must be containerized and treated as an HW until determined otherwise.
- Containment systems will be kept clean and dry at all times.
- All Activities using or installing any 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 user's sole cost and responsibility.
- Required equipment:
- An internal communication or alarm system capable of providing immediate emergency instructions to Activity personnel.
- Telephone or hand-held two-way radio capable of summoning emergency assistance from the Military Police will in the immediate area at all times.
- Portable fire extinguishers, and/or fire control equipment.
  - 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/appropriately maintained.
    NOTE: CO2, Purple K, Water, Halon, or BC are not approved for use.
  - 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.
  - A monthly inspection shall be conducted and documented by the facility manager (or designated representative) for each portable fire extinguisher IAW NFPA 10.
  - The Ft Eustis Fire & Emergency Service (F&ES) Fire Prevention Office can conduct an annual inspection of portable fire extinguishers that is attached to a registered building on the 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.
  - All portable fire extinguishers that are not part of a building requirement must be annual, every 6 and 12 tags attached to it by a certified inspection company. This is the responsibility of the facility Manager/owner of the item.
  - 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.

- If any portable fire extinguisher should fail an inspection or maintenance action, it must be replaced immediately.
- Each portable fire extinguisher shall have its annual, 6 and 12-year maintenance performed by certified maintenance personnel IAW NFPA 10.
- The Ft Eustis Fire & Emergency Service (F&ES) Fire Prevention Office can conduct an annual inspection of portable fire extinguishers that is attached to a registered building on the 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.
- All portable fire extinguishers that are not part of a building requirement must be annual, every 6, and 12 tags attached to it by a certified inspection company. This is the responsibility of the facility Manager/owner of the item.
- 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.
- Portable fire extinguishers must be installed IAW NFPA 10 depending on the hazard protected (which could be 30 or 50 feet.
- 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
- 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.
- Portable fire extinguishers must be located at the site. It can be inside or outside of the containment device.

- Spill kit and decontamination equipment have to be compatible with wastes stored and of adequate capacity to absorb largest single volume of wastes.
- Proper Personal Protection Equipment (PPE).
- Eye washing facilities as required.
- Water, at adequate volume and pressure, to supply expected fire demands, foam producing equipment, automatic sprinklers, or water spray equipment.
- All areas will have signs indicating (must be readable from 50 feet for outside locations):
- "Hazardous Waste Temporary Storage Site – TSS"; or "Hazardous Waste Satellite Accumulation Site – SAS"; or "Non-Hazardous Site, Satellite Accumulation Area – NHS"
- "No Smoking"
- "Unauthorized Personnel Keep Out"
- Emergency Response Information: "Points of Contact" and "Telephone Numbers" will be posted at each site utilizing Emergency Notification, FEVA form 32-700.
- Each site will have a site-specific Contingency Plan (CP).
- Sites storing containers holding ignitable or reactive materials or wastes shall be located at least 50 feet within the installation's property line.
- All materials and wastes stored in approved containers.

  - All sites will maintain a copy of the "Incompatible Materials Chart." Copies of this chart may be obtained from the HWAF.
  - All waste accumulation areas will have adequate aisle space. Sufficient 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.
  - Good housekeeping will be maintained at all times.
  - All TSSs, SASs, and NHS will be inspected at least weekly (Not more than 7 Calendar Days) using the FEVA Form 32-698.
- All TSSs will maintain an electronic inspection log using TSS Weekly Inspection Report Log.
- General Hazardous Waste Accumulation Site management:
  - 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:
  - 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 the use of a TSS.
  - 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.
  - 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.**
  - Due to mission requirements, a TSS may be inactivated for a short period of time.
  - The inspection form must be annotated that all wastes have been turned-in, and no un-corrected deficiencies remain.
  - Upon reactivation, an initial inspection will be accomplished.
  - Utilizing FEVA Form 699, CEIE will be notified within 3 working days of both inactivation and reactivation.
  - Hazardous Wastes generated during field training exercises on the post or on vessels, which remain on-site overnight, must be stored in a SAS.
- Satellite Accumulation Sites - SASs:
  - Must be located at or near the process generating the HW, where the waste initially accumulates.
  - Under the control of the operator of the process generating the waste.
  - If the HW must pass through a threshold or door to reach the accumulation site, then a SAS cannot be used.
  - In large open bays or hangers, etc., the SAS must be close to the site of HW generation.
  - 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.
  - These containers must be transferred to a TSS or the HWAF within three (3) days.

- Less than 90 Day Temporary Storage Sites - TSSs:
  - May be located at a distant site from the point of initial generation.
  - May receive HWs from multiple generation sites, including SASs. UWs and NHWs may be received from multiple sites
  - May store any quantity of HWs.
  - 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.
  - 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.
  - A TSS cannot be changed to a SAS, NHS, or vice versa without prior written approval from CEIE.
- Non-Hazardous Site, Accumulation Areas - NHSs:
  - May be located at a distant site from the point of initial generation.
  - May receive NHWs and recyclables from multiple generation sites, including other NHSs.
  - May store any quantity of NHWs, UWs, or recyclables.
  - Only Non-Hazardous Wastes (NHWs), Universal Wastes (UWs), and recyclables will be accumulated in NHSs.
  - **NO Hazardous Wastes (HWs).**
  - 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.
- TSS, SAS, and NHS Approval Process:
  - CEIE must grant approval before closing a site.
  - All TSS, SAS, and NHS requirements must be met while the site is operational.
  - TSS Approvals:
  - The F&ES, Safety Office, and CEIE must grant approval before establishing a new site or relocating an existing site.
  - All TSS requirements must be met before the site can be used or approved.
  - At least 20 days before the establishment and use of a TSS, a completed approval FEVA Form 699 must be submitted to CEIE.
    - All items on the form must be completed.
    - FEVA Form 32-697, Waste Description Log (WDL), for each waste stream must be attached.
    - Site-Specific Contingency Plan will be included.
    - The FEVA Form 32-699 will be signed by the Commander or Director, having AEC appointment authority.
  - CEIE will inspect the site before granting final approval.
  - Each site will be given an approval number that must be used for waste disposal and reporting.
  - SAS or NHS Approvals:
  - 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.
    - Waste Description Log for each waste stream must be attached.
    - Draft site-specific Contingency Plan must be included.
    - CEIE will inspect the site to determine if it meets SAS and NHS requirements and issues an approval number.

        - The F&ES and Safety Officer will be notified by CEIE.
    - 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.
        - The FEVA Form 32-699 will be signed by the Commander or Director, having AEC appointment authority.
        - The Fire & Emergency Services and Post Safety Office must ensure the location meets fire and safety regulations for the wastes being accumulated.
        - CEIE will inspect the site before granting final approval. Each site will be given an approval number that must be used for waste disposal and reporting.
- Universal Waste (UW) Sites:
    - 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.
    - Sites will be protected from the elements.
    - Must have containment insufficient capacity to hold 110% of the largest volume of a single container.
    - Containment systems will be kept clean and dry at all times.
    - All activities using any outside or freestanding storage building must coordinate with CED Master Planner.
    - Proper Personal Protection Equipment (PPE).
    - Emergency Response Information: "Points of Contact" and "Telephone Numbers" will be posted at each site utilizing Emergency Notification, FEVA Poster 20-E.
    - UWs that have liquids must have containment and the appropriate spill kits (acid, base, mercury, etc.).
    - AEC must keep a file on all locations. These must be recorded on the facility inventory: Activity Facilities and Operations Inventory FEVA Form 32-600.
    - Universal Wastes sites will be inspected at least monthly using the FEVA Form 32-695.
    - Good housekeeping will be maintained at all times.
    - All materials and wastes stored in approved containers.
    - 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.
    - Turn-in procedures in this plan for HWs will be used for UWs.
    - Universal Wastes will be stored in existing SASs or TSSs where practical.
    - Universal Wastes (UW) Batteries will be managed IAW EMP 4.4.6.8.5 Battery Recycling and Disposal Management.
    - Universal Wastes (UW) Lamps will be managed IAW EMP 4.4.6.8.4 Universal Waste (UW) Lamps.
- Universal Waste (UW) Lamp Sites:
    - UW Lamp sites must be sited where a spill or leak would not constitute a discharge to surface waters, storm drains, or the sanitary sewage system.
    - Sites will be protected from the elements.
    - Emergency Response Information: "Points of Contact" and "Telephone Numbers" will be posted at each site utilizing Emergency Notification, FEVA Poster 20-E.
    - Universal Waste Lamp sites do not require site approvals or "Universal Waste" signs; however, the AEC must keep a file on all locations. These must be recorded on the facility inventory: Activity Facilities and Operations Inventory FEVA Form

32-600.
  - Universal Waste Lamps will be stored in existing SASs or TSSs where practical.
  - Universal Wastes Lamp sites will be inspected at least monthly using the FEVA Form 695.
  - Only low mercury or "Green Tip" fluorescent bulbs are authorized for use. Older bulbs must be replaced by the newer low mercury or "Green Tip" bulbs during bulb replacement.
  - Good housekeeping will be maintained at all times.
- Containers of Universal Wastes (UWs):
  - All containers of UWs must have a label indicating the type of UW, e.g., UW Lamps.
  - All containers of UW Lamps must have the Accumulation Start Date (the date the universal waste was first placed in the container) marked on the label.
  - Containers of UW Lamps will be closed in such a manner so that potentially broken lamp debris cannot be released from the container.
  - UW Lamps cannot be stored in the same container with serviceable lamps.
  - Lamps will be stored in containers to prevent breakage.
- Turn-in procedures:
  - UW lamps must be turned-in at:
  - Hazardous Waste Accumulation Facility (HWAF) Bldg. 1208.
  - Activities are responsible for transporting Lamps to the HWAF.
  - Partially filled containers must be turned-in within 60 days of the ASD.
  - Full containers must be turned-in within 10 working days and may not exceed the 60-day limit. If you are generating large quantities (more than 4 boxes), turn-ins must be scheduled with the HWAF before turn-in to the Hazardous Waste Accumulation Facility (HWAF) Operations.
  - Broken lamps must be handled as UWs.
  - Bulb crushing is prohibited on the Installation.
  - Containers of UW Lamps arriving at the HWAF will be inspected.
  - All lamps will be inappropriately closed containers.
  - Containers will be correctly labeled.
  - Containers will be dated.
  - Lamps not passing the inspection will not be accepted and the appropriate AEC will be notified.
- **The crushing of UW lamps/bulbs on the Installation is prohibited.**
- Activities will containerize and provide their transport of UW lamps to the HWAF. They will schedule all turn-ins with the HWAF. Upon arrival they are to check in with the HWAF Staff, fill out the sign-in. **To re-emphasize, all Activity lamps shall be appropriately containerized. If the lamps are not correctly containerized, the AEC will be contacted.**
- The HWAF staff will ship lamps for proper disposal.

7.6 Transportation

The HW Program Manager has overall responsibility for the shipment of HW from all TSS, SAS, and NHWs to an HWAF, and from an HWAF to the disposal facility. The HW Program Manager ensures:

- All transportation over public highways is conducted IAW applicable Department of Transportation (DOT) requirements
- Containers are DOT approved
- Transporters have the appropriate training
- Uniform HW manifests are prepared for offsite transportation (electronically or paper)
- All necessary documentation has been completed, and records are maintained IAW all applicable federal, state, and local requirements and the AF Records Disposition Schedule

Installation Supplement – Transportation

Procedures:

General HWAF Operations:

- Location and Hours of Operation:
  - HWAF is located in Building 1208, and the office is in Building 1207.
  - HWAF is open Monday through Friday from 0800 to 1500 hours.
  - Hours of operation are subject to change without notice due to mission requirements. HWAF is closed on all federal holidays and the Friday after Thanksgiving. If you cannot contact the HWAF and need an immediate answer, call CEIE.
- All scheduling of appointments must be made through the HWAF, 878-3915 and should be in writing or Fax (878-3384). Arrangements for services must be made at least the number of workdays in advance, as indicated below:
  - Delivery of containers and pick up of wastes: 3 days
  - Review and assistance with Waste Description Logs and Turn-in documents: 3 days
  - Review of material profiles: 3 days
  - Review of shipping documents, LDRs, and manifest signing: 5 days
  - Approval of Laboratories, Transporters, and TSDFs: 30 days
- Large Quantity Generator (LQG) requirements must be met, and all HWs and UWs must be disposed of within the appropriate time limits.
- The HWAF staff is there to assist you; however, they will not do your work for you.

Generating Activities Utilizing the HWAF for Waste Turn-ins:

- Schedule the appropriate appointment:
  - The HWAF will issue, deliver, and pick up containers of wastes from approved TSSs, SASs, and NHSs only.
  - Activities without approved sites must schedule an appointment and deliver wastes to the HWAF.
  - HWCs or AECs which fail to keep a scheduled appointment will have to schedule and deliver the wastes to the HWAF. If this causes a violation of the site time limits, the appropriate Commander or Director will be notified.

- Issue and delivery of containers:
  - The HWC, UEC, or AEC must be present during the scheduled delivery, or the scheduled service will be terminated and will be noted on a Pickup inspection report.
  - All Activities must have a Waste Description Log (WDL) approved for each waste before issuing of containers. Activities will schedule an appointment to have their Waste Description Logs approved before requesting containers.
  - The HWAF will also issue a partially completed Container Contents Log (CCL) for each container. Items 1, 2, 4, 6, 8, 9, 10, 11, 12, 13, 14, 16, and 19 will generally be completed at this time by the HWAF.
- Pickup of Containers:
  - The HWC, UEC, or AEC must be present during the scheduled pickup or the scheduled service will be terminated, and it will be noted on a Pickup inspection report.
  - Correctly completed CCL must be completed before scheduling an appointment for pickup.
  - If the HWAF vehicle cannot get reasonably close to the TSS or SAS for container loading, then the activity will move accepted containers to the HWAF pickup vehicle. The Activity may need to have additional personnel available to help move containers.
  - The HWAF staff will inspect all containers and conduct a site evaluation for compliance.
  - Containers will be opened during the inspection. Activity personnel will assist during this process and must bring appropriate Personal Protection Equipment. At a minimum, this will include eye protection and gloves.
- Rejections and Corrections:
  - Only AECs and HWCs can turn-in wastes. Trained Coordinators are the only personnel authorized to sign the turn-in documentation's certification (CCLs). This is an automatic rejection.
  - Containers failing to meet all turn-in requirements will be rejected.
  - On-the-spot corrections for some administrative requirements may be possible.
  - Activities that have containers rejected for any reason will have the rejection noted on the Pickup inspection report. Activities receiving a repeated rejection, numerous on the spot corrections for a single turn-in, or always requiring corrections over multiple turn-ins will have this noted on the inspection report. The Commander/Director will be required to send the Corrective Action Report through the MSG Commander to CEIE.
  - Compliance site evaluations conducted during delivery or pickups by the HWAF staff.
- Reimbursement for HWAF services: Activities may be required to reimburse the Base for services provided by the HWAF. The procedures below will be utilized for this process:
  - Reimbursements will be recorded and paid by using FEVA Form 32-690, “HWAF Reimbursable Log.”
    - Cost of containers received.
    - Sampling.

        - Off-spec fuel charges.
        - Antifreeze recycling charges.
        - Filters recycling charges
        - HWAF operational overhead rate (HWAF O/H). This per pound rate will be determined by CEIE based on HWAF volume and operational costs.
    - Reimbursements for DLA Disposition Services, Norfolk disposal charges will be recorded and paid by using DD Turn-in Form 1348-1A.
    - This log will be closed by HWAF personnel and submitted to Resources Flight for the transfer of funds.

Generating Activities Not Utilizing the HWAF for Waste Turn-ins:

- Generating Activities may seek permission or be directed by CEIE to contract for laboratory, transportation, and disposal services for the following reasons:

    - The Activity has unique mission requirements that prevent the utilization of DLA Disposition Services, Norfolk contracts. This action requires DA approval.
    - Waste disposal is not available from DLA Disposition Services, Norfolk, due to the type of waste.
    - Contractors with project-specific wastes that require them to arrange for transportation and disposal.
    - Other circumstances, e.g., generating Activity's mismanagement, which prevents utilization of DLA Disposition Services, Norfolk contracts, or may violate the 90-day accumulation limitation.
- In all cases, the generating Activity assumes all generator and generating Activity's liabilities, costs, and regulatory responsibilities for compliance and proper management in addition to accordance with this regulation. The CEIE will impose significant limitations, management oversite, and direction that will ensure installation compliance.
- All generating Activities contracting these services must have the contracts reviewed and approved by the Civil Engineer Division/Environmental Element.
    - Only CEIE approved laboratories, transporters and TSDFs will be used.
    - Activities will be required to fund laboratory, transporter, and TSDF audits contracted for or conducted by CEIE personnel as needed.
    - The HWAF O/H rate will be applied to each manifest or bill of laden based on total shipping weight using FEVA Form 32-690.
- Contactors accumulating wastes at SASs will move the waste to the HWAF to meet the 3 day time limit while awaiting transportation.
    - All containers will have Container Contents Logs.
    - Transporter and TSDF will be identified, or the waste management company handling the wastes will be identified before the commencement of any waste generating processes.
    - The approximate ship date will be given. All HWs will be transported by day 80. If not, the HWAF will have the wastes transported and disposed at the contractor's expense.
- Contractors will be responsible for:

  - Preparing the manifest and Land Disposal Restriction (LDR) documentation.
  - Providing placards.
  - The 24-hour emergency response number for the manifest.
- This requirement will be reviewed annually by CEIE for recurring needs.
- Proper Waste Stream management must be accomplished:
  - Activities must have an approved Waste Description Log for each line item (waste stream) on HW manifests or non-hazardous waste manifests/bills of lading before issue of a manifest document number.
  - Material profiles must be reviewed and approved by the HWAF before shipment.
- Personnel authorized to sign manifests or shipping documents:
  - Each manifest must have 24-hour emergency response information. The installation does not provide this capability; therefore, the activity must arrange for this service.
  - Manifest errors will be justification for the individual signing the manifest to be permanently removed from the authorized signature list and may incur other legal actions. Activities not having an authorized signature person will be required to schedule shipments with the HWAF to have the manifest signed.
- Activities signing materials profiles, LDRs, and manifests will have up to date copies of the following regulations and references as a minimum:
  - 40 CFR 260 – 299.
  - 49 CFR 100 – 177.
  - Virginia Hazardous Waste Management Regulations.
  - North American Emergency Response Guidebook.
- Correctly completed and certified Container Contents Logs (CCLs) must be delivered to the HWAF along with the signed legible copies of manifests, TSDF material profiles, analytical data, and LDRs within 2 working days of each shipment.

Transportation.

- On-Post movements of HWs, UWs, and NHWs must meet the following requirements:
  - Only government-approved, or licensed contractor vehicles will be used to move HWs, UWs, or NHWs **- Absolutely no POV's**.
  - The HWC or AEC will supervise all movements of HWs and NHWs.
  - Vehicles moving HWs, UWs, and NHWs will have fire extinguishers appropriate for the type of materials being moved.
  - If containers of HWs, UWs, or NHWs have free liquids, then a spill kit will be carried.
  - A correctly completed DD Form 1348-1A, Turn-in Document, and or Container Content Log (CCL) will serve as shipping documentation on Base.
  - Provide a correctly completed Container Content Log (CCL).
  - Containers will be secured to prevent movement or spills.
  - HWs will not be stored on a vehicle(s) overnight.
- 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 are already correctly manifested and the licensed transporter is scheduled for pick-up of HW or UWs at JBLE - Eustis.

- **Disposal: All HW, UW, or NHW turn-ins or shipments must be** coordinated with the HWAF.
- 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.
    - Must have Advanced Environmental Management (AEM) and DOT "HazMat Employee" training.
    - Also, we must have at least 4 hours of training on Land Disposal Restrictions (LDRs).

7.7 Turn In/Disposal

The turn-in procedures contained in DoD 4160.12-M. DLA Disposition Services are followed. In the event an alternate route for disposal is needed, a waiver will be obtained with proper justification and approval.

Containers are inspected before turn-in to ensure that container management procedures have been followed and that containers are appropriately labeled and in good condition. If the container is not in good condition, contents are transferred to a container that is in good condition.

Installation Supplement – Turn In/Disposal

- **Activities will:**
    - Either turn-in wastes directly to the HWAF or coordinate shipments of wastes with the HWAF to include laboratory analysis, container numbering, material profiling, manifesting, Land Disposal Restriction (LDR) approval, etc.
    - Reimburse the installation for HWAF operational overhead as required.
    - Reimburse HWAF for all containers and labels issued; and other charges as required, i.e., sampling. The HWC, UEC, or AEC must contact the HWAF to schedule the appropriate appointment. Additional personnel is not allowed to schedule appointments.
    - Unique "one-time" waste generation from Activities which do not routinely generate HWs or NHWs must submit a memorandum to the CEIE stating why this is a unique event signed by the Commander or Director having AEC appointment authority. The Commander or Director will sign all documents in the absence of an AEC. This action cannot be delegated to subordinates.
    - Activities having TSSs, SASs, or NHSs which do not have an AEC, HWC, or UEC must submit a memorandum to the CEIE stating why an AEC, HWC, or UEC has not been appointed and trained signed by the Commander or Director having AEC appointment authority. The Commander or Director will sign all documents in the absence of an AEC. This action cannot be delegated to subordinates.

- **Procedures:**

- **General HWAF Operations:**

  - Location and Hours of Operation:
  - HWAF is located in Building 1208, and the office is in Building 1207.
  - HWAF is open Monday through Friday from 0800 to 1500 hours.
  - Hours of operation are subject to change without notice due to mission requirements. HWAF is closed on all federal holidays and the Friday after Thanksgiving. If you cannot contact the HWAF and need an immediate answer, call CEIE.
  - All scheduling of appointments must be made through the HWAF, 878-3915, and should be in writing or Fax (878-3384). Arrangements for services must be made at least the number of workdays in advance as indicated below:
  - Delivery of containers and pick up of wastes: 3 days
  - Review and assistance with Waste Description Logs and Turn-in documents: 3 days
  - Analysis of material profiles: 3 days
  - Review of shipping documents, LDRs, and manifest signing: 5 days
  - Approval of Laboratories, Transporters, and TSDFs: 30 days
  - Large Quantity Generator (LQG) requirements must be met, and all HWs and UWs must be disposed of within the appropriate time limits.
  - The HWAF staff is there to assist you; however, they will not do your work for you.

- **Generating Activities Utilizing the HWAF for Waste Turn-ins:**

  - Schedule the appropriate appointment:
  - The HWAF will issue, deliver, and pick up containers of wastes from approved TSSs, SASs, and NHSs only.
  - Activities without approved sites must schedule an appointment and deliver wastes to the HWAF.
  - HWCs or AECs which fail to keep a scheduled appointment will have to schedule and deliver the wastes to the HWAF. If this causes a violation of the site time limits, the appropriate Commander or Director will be notified.
  - Issue and delivery of containers:
  - The HWC, UEC, or AEC must be present during the scheduled delivery, or the scheduled service will be terminated and will be noted on a Pickup inspection report.
  - All Activities must have a Waste Description Log (WDL) approved for each waste before issuing of containers. Activities will schedule an appointment to have their Waste Description Logs approved before requesting containers.
  - The HWAF will also issue a partially completed Container Contents Log (CCL) for each container. Items 1, 2, 4, 6, 8, 9, 10, 11, 12, 13, 14, 16, and 19 will generally be completed at this time by the HWAF.

- Pickup of Containers:
- The HWC, UEC, or AEC must be present during the scheduled pickup, or the scheduled service will be terminated and it will be noted on a Pickup inspection report.
- Correctly completed CCL (EMP 4.4.6.8.1 TAB 2) must be completed before scheduling an appointment for pickup.
- If the HWAF vehicle cannot get reasonably close to the TSS or SAS for container loading, then the activity will move accepted containers to the HWAF pickup vehicle. The Activity may need to have additional personnel available to help move containers.
- The HWAF staff will inspect all containers and conduct a site evaluation for compliance.
- Containers will be opened during the inspection. Activity personnel will assist during this process and must bring appropriate Personal Protection Equipment. At a minimum, this will include eye protection and gloves.
- Rejections and Corrections:
- Only AECs and HWCs can turn-in wastes. Trained Coordinators are the only personnel authorized to sign the turn-in documentation's certification (CCLs). This is an automatic rejection if not completed correctly.
- Containers failing to meet all turn-in requirements will be rejected.
- On-the-spot corrections for some administrative requirements may be possible.
- Activities that have containers rejected for any reason will have the rejection noted on the Pickup inspection report. Activities receiving a repeated rejection, numerous on the spot corrections for a single turn-in, or always requiring corrections over multiple turn-ins will have this noted on the inspection report. The Commander/Director will be required to send the Corrective Action Report through the MSG Commander to CEIE.
- Compliance site evaluations conducted during delivery or pickups by the HWAF staff will be IAW EMP 4.5.2.1.
- Reimbursement for HWAF services: Activities may be required to reimburse the Base for services provided by the HWAF. The procedures below will be utilized for this process:
- Reimbursements will be recorded and paid by using FEVA Form 32-690, “HWAF Reimbursable Log” (EMP 4.4.6.8.1 Tab 3).
    - Cost of containers received.
    - Sampling.
    - Off-spec fuel charges.
    - Antifreeze recycling charges.
    - Filters recycling charges
    - HWAF operational overhead rate (HWAF O/H). Per pound rate will be determined by CEIE based on HWAF volume and operational costs.
    - Reimbursements for DLA Disposition Services, Norfolk disposal charges will be recorded and paid by using DD Turn-in Form 1348-1A.
- This log will be closed by HWAF personnel and submitted to Resources Flight for the transfer of funds.

- **Generating Activities Not Utilizing the HWAF for Waste Turn-ins:**

  - Generating Activities may seek permission or be directed by CEIE to contract for laboratory, transportation, and disposal services for the following reasons:
  - The Activity has unique mission requirements that prevent the utilization of DLA Disposition Services, Norfolk contracts. This action requires DA approval.
  - Waste disposal is not available from DLA Disposition Services, Norfolk, due to the type of waste.
  - Contractors with project-specific wastes which require them to arrange for transportation and disposal.
  - Other circumstances, e.g., generating Activity's mismanagement, which prevents utilization of DLA Disposition Services, Norfolk contracts, or may violate the 90-day accumulation limitation.
  - In all cases, the generating Activity assumes all generator and generating Activity's liabilities, costs, and regulatory responsibilities for compliance and proper management in addition to compliance with this regulation. The CEIE will impose significant limitations, management oversite, and direction that will ensure installation compliance.
  - All generating Activities contracting these services must have the contracts reviewed and approved by the Civil Engineer Division/Environmental Element.
  - Only CEIE approved laboratories, transporters and TSDFs will be used.
  - Activities will be required to fund laboratory, transporter, and TSDF audits contracted for or conducted by CEIE personnel as needed.
  - The HWAF O/H rate will be applied to each manifest or bill of laden based on total shipping weight using FEVA Form 32-690.
  - Contactors accumulating wastes at SASs will move the waste to the HWAF to meet the 3 day time limit while awaiting transportation.
  - All containers will have Container Contents Logs.
  - Transporter and TSDF will be identified, or the waste management company handling the wastes will be identified before the commencement of any waste generating processes.
  - The approximate ship date will be given. All HWs will be transported by day 80. If not, the HWAF will have the wastes transported and disposed at the contractor's expense.
  - Contractors will be responsible for:
  - Preparing the manifest and LDR.
  - Providing placards
  - The 24-hour emergency response number for the manifest.
  - This requirement will be reviewed annually by CEIE for recurring needs.
  - Proper Waste Stream management must be accomplished:
  - Activities must have an approved Waste Description Log for each line item (waste stream) on HW manifests or non-hazardous waste manifests/bills of lading before issue of a manifest document number.
  - Material profiles must be reviewed and approved by the HWAF before shipment.
  - Personnel authorized to sign manifests or shipping documents:

- Each manifest must have 24-hour emergency response information. The installation does not provide this capability; therefore, the activity must arrange for this service.
- Manifest errors will be justification for the individual signing the manifest to be permanently removed from the authorized signature list and may incur other legal actions. Activities not having an authorized signature person will be required to schedule shipments with the HWAF to have the manifest signed.
- Activities signing materials profiles, LDRs, and manifests will have up to date copies of the following regulations and references as a minimum:
- 40 CFR 260 – 299.
    - 49 CFR 100 – 177.
    - Virginia Hazardous Waste Management Regulations.
    - North American Emergency Response Guidebook.
- Correctly completed and certified Container Contents Logs (CCLs) must be delivered to the HWAF along with the signed legible copies of manifests, TSDF material profiles, analytical data, and LDRs within 2 working days of each shipment.

7.8 Inspection

Inspection processes fulfill the "Check" function of the EMS "Plan, Do, Check, Act" cycle. HWASs are inspected at least weekly to ensure proper accumulation and container management. Resource Conservation and Recovery Act (RCRA) Part B permitted storage facilities are inspected according to the inspection schedule established in the permit. All other inspections occur IAW AFI 90-201, *The Air Force Inspection System,* and the Commander's Self Inspection Program. Inspection records are maintained IAW the Recordkeeping and Reporting section of this plan.

Installation Supplement – Inspection

- **Internal Inspection Procedures:**

- Activity inspectors will conduct inspections as required:

    - Weekly (within 7 calendar days) inspections of TSSs, SASs, and NHSs.
    - Monthly (within 30 days) inspections of all UW storage locations.
    - All findings will be corrected immediately if possible or NLT 10 calendar days.

- The Activity Environmental Coordinator (AEC) will conduct quarterly Activity Internal Inspections of all Activity facilities and operations.

    - The Activity Assessment Multi-Media Checklist will be used.
    - The AEC will maintain an inventory of all the Activity's facilities and operations using the Activity's Facilities and Operations Inventory FEVA Form 32-600. The AEC may modify this spreadsheet to fit the Activity's facilities and operations; however, format and column headers must be maintained.

- Each subordinate Activity will be inspected, e.g., for a Battalion, each company or detachment will be checked; for a Directorate, each division or department depending on organization will be inspected; for those organizations having contractor support, the contractor as a whole will be inspected.
- AECs will record findings of non-compliance found during the inspections.
- Prepare an Activity Corrective Action Plan (ACAP) IAW EMP 5.5.2.3.1 for each AEC quarterly inspection:
- The ACAP will be prepared using the format in EMP 4.5.2.3.1 Tab 1 ACAP Summary Report.
- The ACAP will be signed by the Commander or Director, having to appoint the authority of the AEC within 30 days of the inspection date.
- Subordinate Activities will be re-inspected by the AEC within 30 days of any inspection or re-inspection that shows 3 or more findings.
- Activities will make on the spot corrections or take immediate actions to correct all findings of non-compliance found during any assessment or inspection if possible or NLT 10 calendar days.

- Activities will record and report the status of the Activity's internal inspections and assessments:

  - Activity Inspectors will report completion to the AEC and provide a finding of non-compliance information if necessary for their required weekly and monthly inspections.
  - The original of the ACAP signed by the Commander or Director will be kept on-site in the AEC's files and made available for inspection.
  - A copy of the ACAP will be sent to the Activity's next higher HQs in the chain of command, e.g., a Battalion will send a copy to its Brigade HQs; Contractors will send a copy to their COR and the corporate/owner's office.
  - Documentation of this will be kept on-site in the AEC's files.
  - An inspection report will be sent to CED-CEIE within 10 calendar days of the completion of the AEC's quarterly inspection utilizing EMP 4.5.2.3 Tab 1 Activity Assessment Multi-Media Checklist.
  - The report will be signed and certified by the Commander/Director. By signing the report the Commander/Director is confirming that all information is true and accurate.
  - The report will be sent by digitally signed email to USAF JB L-E 733 MSG List CED-CEIE Internal Assessments (kenneth.w.dunn2.civ@mail.mil)
  - The report will include the following documents:

    - Copy of the completed Activity Assessment Multi-Media Checklist
    - Copy of the completed Activity Facilities and Operations Inventory FEVA Form 32-600
    - A copy of the transmittal correspondence required in paragraph (2) (a) above.

  - A copy of the completed ACAP Summary Report FEVA Form 32-601 will be sent to CED-CEIE within 30 calendar days of the completion of the AEC's quarterly inspection.
  - The ACAP is required when there are findings noted on the inspection in the paragraph.
  - The report will be sent by digitally signed email to USAF JBLE-Eustis 733 MSG List CED-CEIE Internal Assessments (kenneth.w.dunn2.civ@mail.mil)

- CED-CEIE will:

  - Report inspection metrics to the Installation Cross-Functional Team (CFT) quarterly and the Environmental, Safety, and Occupational Health (ESOH) Council semiannually.
  - Notify Command for Activities failing to report inspection data.
  - Use the Findings Tracker in eDASH to record and track all findings. This information is available to higher-level Commands.

- CED-CEIE Program Managers:

  - Media Program Managers will:
  - Review inspection reports and ACAPs.
  - Conduct unannounced inspections to verify inspection reports and ACAPs.
  - Inspection Program Manager will:
  - Enter data into eDASH Finding Tracking Tool within 15 calendar days of receipt of inspection reports.
  - Closeout findings in the eDASH Finding Tracking Tool within 15 calendar days of receipt of ACAPs.
  - Maintain inspection and ACAP database to track metrics.

7.9 Waste Minimization

HW manifests include a certification that a waste minimization program is in place. Below are essential activities and processes that are performed as part of waste minimization and pollution prevention efforts:

- Hazardous material process authorization and hazardous materials management processes – Each process involving the use of hazardous materials and the generation of waste streams is evaluated and authorized. Process authorization is performed through EESOH-MIS. The HW Program Manager, Hazardous Materials Management Program (HMMP) Team, and the generating activity make a final determination whether or not the results of the process authorization effort are sufficient to reduce waste toxicity and volume
- Procurement and use of minimal quantities – When a material with environmental risk must be used, minimum amounts are procured to minimize surplus quantities and shelf life exceedances

- Recycling – When the use of hazardous materials is unavoidable, excess or waste material is evaluated for reuse or recycling
- Environmental action planning – Environmental action plans (EAPs) are developed and maintained as part of the overall EMS. EAPs are management plans that translate environmental objectives and targets into actionable plans. Waste minimization efforts are considered during the development of EAPs

Installation Supplement – Waste Minimization

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

- HazMin Plan must be:
  - Reviewed and updated at least annually by the AEC.
  - It is signed by the Commander or Director, having AEC appointment authority.
  - Maintained at each TSS, SAS, or NHS with the Functional Area Continuity Book (FACB).
  - Must be available for waste site pickup, announced, and unannounced inspections.
- The purpose of the HazMin Plan is to:
  - Reduce the volume of wastes being generated.
  - Reduce the Toxicity of wastes being generated.
  - Reduce the number of Hazardous Materials utilized.
- The HazMin Plan will include:
  - Reductions Goals:
  - Reduce HW, NHW, & UW 20% by 2020.
  - Interim reduction by CY18, 15 % reduction.
  - Measures to Reduce the amount of Hazardous Materials (HMs) being utilized by:
  - Maintaining a list of HMs being used.
  - Referencing specific citations requiring the usage of the HMs.
  - Evaluating and substituting less toxic products for each HM.
  - Minimizing the purchasing and overstocking stocking of HMs.
  - Redistribution of overstocked HM to reduce waste generation.
  - Evaluating and tracking of waste steam generation by:
  - Maintaining a list of wastes being generated.
  - Annual coordination with the HWAF to validate Activity's Waste yearly generation for the previous calendar year.
  - Comparing the volume of each waste generated for the most recently completed calendar year to the previous calendar year. Use the Container Turn-in Log FEVA Form 32-696 for this comparison and reconciliation with HWAF numbers.
  - Maintaining a chart to track trends and identify opportunities to reduce waste generation. The chart should track at least calendar years. The reason for increasing waste generation from one year to the next must be cited.
  - Methods to evaluate changes in operations and processes to reduce waste generation.

7.10 Preparedness and Prevention

Preparedness and prevention practices are described in emergency prevention and response plans available through the references section of this plan and are maintained IAW the EMS on eDASH: Emergency Preparedness and Response, and shall include the Installation Spill Prevention, Control, and Countermeasure (SPCC) Plan (or equivalent) or a specific HW Contingency Plan.

7.11 Waste Specific Procedures

Waste-specific procedures are included in the installation supplement below or maintained as separate operational controls outside of this plan.

Installation Supplement – Waste Specific Procedures

Hazardous Waste Management (HWM) Special Procedures for Unique Wastes
Purpose: Special procedures for managing unique wastes streams that are generated by the Activities on the installation.

Roles and Responsibilities:

- Civil Engineer Directorate (CED); Environmental (CEIE) will:
  - Manage the Installation's HWM program.
  - Establish special procedures for the management of unique wastes on a case by case basis.
- Activities will:
  - Comply with all special procedures for the specified unique wastes in this EMP or the full HWM procedures will apply if not in full compliance.
  - Comply with all HWM procedures in EMP 4.4.6.8 and its related EMPs, unless otherwise modified in paragraph 6 below.

Procedures:

- Unique Waste Streams: The Unique Waste Streams listed below are the only waste streams subject to the modified special procedures:
  - Silver Nitrate Treatment Swabs/Sticks.
  - TBD.
- Pharmacological Wastes. No Regulated Medical Wastes to include, but not limited to; "Infectious Waste," "Bio-hazardous Waste," "Clinical Waste," "Biomedical Waste," etc. or any Drug Enforcement Agency (DEA) Scheduled compounds.
  - Silver Nitrate Treatment Swabs/Sticks :
  - Site Management:
    - Use FEVA 32-699 for approval; Block 2, SAS; Block 8, Bldg. # (Various); Block 15, all possible Container locations will be identified on the Site Map. Give each possible location its own identification number (ID), e.g., 1st Floor area 1 = 1F1; 3rd Floor area 2 = 3F2, etc.

        - Use FEVA Form 32-698 to conduct monthly inspections of each container location. One line per location. In the "CORRECTIVE ACTIONS & DATE," block indicates the appropriate location ID.
    - Waste Containers:
        - Properly labeled containers will be issued for each location by the HWAF.
        - DO NOT MOVE Containers from ONE Location to Another!
        - Containers may be reused if serviceable.
        - Containers will be marked with an Initial Accumulation Date (IAD) when waste is put in the container. Use a grease pencil or other easily removed marker for recording the date. This IS NOT an Accumulation Start Date (ASD). The maximum time waste can be at each location before consolidation is 180 days.
        - The HWAF will issue a container for the consolidation of the wastes from the various locations with a CCL.
        - When consolidation is made, in Block "Type of Waste," The Location ID and IAD will be recorded along with the type of waste. The consolidated waste will be moved to a TSS, never to a SAS or NHS. The date the consolidated waste is transferred to the TSS will become the ASD.

8.0 REFERENCES

Standard References *(Applicable to all AF Installations)*

- Advanced Distributed Learning Service (ADLS)
- AFI 32-7001, *Environmental Management*
- AFMAN 32-7002, *Environmental Compliance and Pollution Prevention*
- AFI 90-201, *The Air Force Inspection System*
- AFLOA HW Legal and Other Requirements – The Air Force Legal Operations Agency (AFLOA) legal registry lists and provides access to federal (e.g., CFR, U.S. Code), DoD, AF, and other legal requirements
- ARC Net – Training resource for Air Force Reserve Command
- DoD 4160.21 (all volumes), Defense Materiel Disposition
- EASI Database (includes SIRIS)
- eDASH HW Environmental Action Plans (EAPs)
- eDASH HW Home Page
- eDASH HW Training Matrix
- EESOH-MIS Application Login
- EESOH-MIS Support Portal
- The Environmental Awareness Course Hub (TEACH)
- HW Playbook

9.0 ACRONYMS

Standard Acronyms *(Applicable to all AF Installations)*

- eDASH Acronym Library
- HW Playbook – Acronym Section

- U.S. EPA Terms & Acronyms

10.0 DEFINITIONS

Standard Definitions *(Applicable to all AF Installations)*

- HW Playbook – Definitions Section

APPENDICES

Appendix A – Waste Analysis Plan

JBLE-Eustis WAP Contents

This plan contains procedures for characterizing HWs, including HW sampling and analysis, to comply with Federal and State RCRA requirements. This section includes base-specific procedures for obtaining the information necessary to complete the waste inventory, including the waste identification process, the waste evaluation process, the base Waste Characterization Plan (WCP), laboratory procedures, and the QCP.

HW Identification and Characterization Process

Waste identification is a process by which all newly generated wastes at JBLE-Eustis are evaluated to determine whether the waste is hazardous or non-hazardous. Waste identification and characterization also classify HWs. This process can be conducted either by using the waste generator's knowledge of the waste or by analytical testing. In either case, all evaluations must be based on the EPA solid waste and HW definitions. Analytical testing is required at JBLE-Eustis for all waste streams that are chemical mixtures. Testing is not generally needed for unused expired waste with SDS, commercial chemical products or laboratory chemicals in their original, marked container.

GA, with the help of CEIE, will (1) identify all potentially HW streams generated in or around facilities under their control and (2) bring these potentially HW streams to the attention of CEIE. All GAs will conduct periodic surveys of their facilities and processes to identify such waste streams; at a minimum, all GAs must conduct such a survey annually and provide an updated waste stream inventory to CEIE.

- The GAs should ask the following questions to determine if they have an HW stream which requires further testing:
    - Is the material no longer useful for its intended purpose because it is dirty, out of specification, expired, or spill residue?
    - Is it an unintended or unusable byproduct?
    - Does the base intend to discard the material for eventual treatment, storage, recycling, or disposal?
    - Does cleanup produce it at a previous uncontrolled waste site?
    - Is it a solid waste? Solid waste is generally defined as any discarded material, including solids, liquids, and containerized gases that are abandoned, recycled, or considered inherently waste-like.
    - Is it an HW? If the material is a solid waste, the solid waste must be evaluated to determine if it is an HW. Material is an HW if it has not been excluded from regulation and has the characteristics of an HW (e.g., ignitable, corrosive, reactive, or toxic), a listed HW, or a mixture of a listed waste and a solid waste. This evaluation can be conducted by either

using the generator's knowledge of the hazardous characteristics of the waste in light of the materials or processes used or by analytical testing, as described in 40 CFR 261 and the waste analysis plan.

CEIE will provide technical support, as necessary, in conducting these waste stream inventory surveys. During the waste stream surveys, each HW stream will be reviewed for changes in the work process or chemical usage. If a significant change is noted that would alter the waste stream, it will be re-characterized at that time.

Waste Evaluation.

In accordance with 40 CFR 262.11 (c) and the Virginia Hazardous Waste Management Regulations (VHWMR), the installation CEIE must determine whether a waste will be disposed of as hazardous either by testing, using approved methods, or by applying user knowledge of the materials and processes from which wastes are generated.

New waste streams and waste streams of unknown origin require characterization to determine whether they are hazardous. Also, there are USAF requirements to re-characterize known waste streams regularly. Also, the WAP, per AFMAN 32-7002, *Environmental Compliance and Pollution Prevention* specifies that high-volume wastes (those that generate more than three 55-gallon drums per year) must be re-characterized/re-analyzed at least annually and that low volume wastes (those that generate up to three 55-gallon drums per year) must be re-characterized/re-analyzed at least every 3 years.

Before wastes are accepted for storage at an HWAF site and before they can be disposed of off base, sufficient information must be obtained describing the waste's chemical and physical properties to allow safe storage and disposal of the wastes.

Potentially HW streams, once identified by GA personnel, must receive prompt attention and their status determined as soon as possible. Once a new waste stream is identified, the GA will notify CEIE, who will characterize the waste and complete a DRMS Form 1930 HWPS. Unknown potentially HW streams will be labeled with the following "This Container on Hold Pending Analysis," where the waste came from if known, date of sample, POC and phone number. An updated HWPS must be submitted to the HW disposal contractors and DRMO by December 1 of each year or when the waste stream changes, regardless of whether the waste stream was re-characterized.

CEIE personnel has specialized training and experience for evaluating potentially HWs. Also, they have access to both military and contract laboratory support. As a result, CEIE is the OPR for determining whether a particular waste is hazardous. However, the GA must provide sufficient information to CEIE personnel to make this determination and to assist in completing the HWPS. This information should include but is not limited to, a list of all materials and chemicals used, SDSs, manufacturer information, and process information.

CEIE will make every effort to evaluate potentially HW streams through the application of knowledge of the hazardous characteristic of the waste regarding the materials or processes used. Also, it may become necessary to sample and analyze the waste stream to accurately characterize the waste and ensure proper treatment, storage, disposal, and transportation of the waste.

- The generator's knowledge will be used to characterize a waste stream only if:
    - All constituents of the waste stream are known.
    - The waste stream does not contain more than one chemical formulation (i.e., chemicals or products containing chemicals have not been mixed together in the waste stream).
    - The process of generating the waste is thoroughly understood and documented.
    - The constituents of the waste stream and their concentrations do not vary.
    - SDSs for all constituents of the waste stream are available.

All waste streams that do not meet the criteria outlined above will be characterized using laboratory analysis results. All supporting documentation used to describe the waste stream will be attached to the HWPS. This documentation includes laboratory analysis results and any documents used to support the generator knowledge. GA personnel will certify that to the best of their knowledge, and the HWPS is an accurate representation/characterization of the waste stream.

Once a determination is made by CEIE personnel as to whether a particular waste stream is hazardous, that determination will remain in effect until rescinded in writing by CEIE. GA personnel must inform CEIE of any process change that may impact their waste stream. For example, the substitution of a non-hazardous, biodegradable cleaner for a hazardous chemical must be reported to and approved by CEIE in writing before replacement. Likewise, process changes that increase the volume or augment the hazardous nature of a particular waste stream must be reported.

Waste Stream Evaluation Process summarizes the specific steps taken in the waste stream evaluation process. Waste streams will be re-characterized annually, unless otherwise noted in the WCP and, as required, during quarterly QC reviews. The details of the chemical properties of all new materials received and used on base by the contractor are processed through the 733 CONS. This falls into two categories and is maintained as follows:

- Locally Purchased Materials: 733 CONS acquires SDSs on new chemicals that do not have current SDSs. The SDS is forwarded to the Hazardous Material (HAZMART) Pharmacy for programming into the EESOH-MIS.
- Federally and nationally listed stock items: BE can ascertain the makeup of the compound from SDSs on file.
- Contractors performing work on base are required to provide current SDSs to the assigned contracting officer detailing the chemical constituents and physical properties of all hazardous materials used for the project. The

contract administrator for the duration of the contract maintains these SDSs on file. All wastes generated as a result of the use of these materials are the responsibility of the contractor unless otherwise specified in the contract. CEIE must approve these deviations.

The GA has control over material contents placed in the storage containers maintained at the SASs. If the material's composition is unknown, the GA requests sampling in writing to CEIE.

No off-site chemicals/wastes are processed, managed, or received by JBLE-Eustis.

WCP

The WCP lists all existing waste streams and their current characterization for JBLE-Eustis. The WCP also provides the information necessary to re-characterize the waste streams. The WCP should be consulted when information is required for shipping, manifesting, disposal, storage, reporting, and re-characterization of a waste stream. The WCP should also be consulted when reviewing waste stream characterizations for the QCP.

- The WCP was developed to comply with 40 CFR 264.13(b) and VHWMR. Detailed explanations of the WCP columns are provided in Appendix H.
- Sequential waste stream identification numbers organize the WCP. CEIE will assign a specific JBLE-Eustis identification number for all Waste streams. The number is based on the type of waste (e.g., SC-002 references all types of absorbents contaminated with fuels, oils, hydraulic fluid, etc.).

Waste Sampling

A sampling of waste streams will be required to obtain analysis results for wastes not characterized by the generator's knowledge.

- A contractor authorized by AFCEC Fence-to-Fence (F2F) contract will take the sample using the sampling method specified in the WCP. Sample collection procedures will be IAW current federal guidelines or as outlined in USAF CDC 90750, Vol. I, Section 7.2 (or equivalent) and current AFIOH requirements.
- All sampling containers/lids will be compatible with the waste being sampled; samples will be chemically preserved and chilled if required and will have a protected identification label. The sampler will also provide a chain-of-custody seal on the container/lid to prevent tampering.
- The sampler will complete a sample and chain-of-custody form for all samples.
- Sample containers will be placed in an appropriate shipping container and shipped to the laboratory in a manner that ensures that holding

times for the analysis required will not be exceeded.

- All sample results will be provided within a period to ensure that wastes do not exceed storage limitations. Generally, this is within 10 calendar days following the sample collection date.

Sampling Methods

The COLIWASA is the primary sampling device/method chosen for collecting the various liquid waste stream samples. COLIWASA is referenced in 40 CFR 261, Appendix 1, as the recommended sampling device. According to EPA-600/2-80-018, *Samplers and Sampling Procedures for HW Streams* (January 1980), COLIWASA permits the representative sampling of multiphase wastes of a wide range of viscosity, corrosives/corrosiveness, volatility, and solids content. The simple design is easy to use and permits a rapid collection of samples, thereby minimizing exposure of the sample collector to potential hazards. Two types of COLIWASA samplers are common: plastic and glass. The plastic-type consists of translucent plastic (usually polyvinyl chloride) sampling tube. The glass COLIWASA is generally constructed of Borosilicate glass plumbing pipe for the sampling tube with a Teflon® plastic stopper rod. Disposable glass COLIWASA samplers are used for JBLE-Eustis sampling. For solid waste streams, sampling devices as specified in 40 CFR 261, Appendix I, will be used. All sampling methods are duly noted in the WCP. Proper personal protective equipment must be worn during all sampling activities. All disposable sampling equipment will be managed as HW IAW the JBLE-Eustis HWMP. All used disposable COLIWASAs, contaminated personal protective equipment, spill residue, etc., generated during sampling will be placed in an appropriate container and accumulated IAW all procedures as specified in the HWMP. Before the accumulated waste sampling equipment is disposed of, it will be characterized IAW this WAP. If reusable sampling equipment is used, it must be decontaminated IAW EPA Region III and Virginia Department of Environmental Quality procedures before it may be reused for additional sampling.

If a sampling device (e.g., glass COLIWASA) breaks off inside a waste accumulation container during sampling, the parts of the sampler remaining in the container must be removed before the waste is disposed of. It is the responsibility of the sampler to remove all broken pieces from the container and to ensure that the sampling device is disposed of as HW. Proper personal protective equipment must be worn when removing the damaged sampling device. While removing the broken sampling device, if it is necessary to open, damage, or otherwise compromise the integrity of the waste accumulation container, the container must be repackaged (e.g., drum over pack) or its contents transferred to a new container IAW the procedures specified in the HWMP.

Sampling Documentation

- All sampling activities will be documented on a chain-of-custody form. Chain-of- custody procedures ensure the integrity of the samples and

provide documentation of that integrity in case of any litigation.

- The laboratory analyzing the waste sample will provide the sampling forms with spaces provided to include the information specified above. The sampler will fill out the chain-of-custody for all samples. Anyone having possession of the sample will sign the chain- of- custody and indicate the date and time of their possession and will keep a copy of the sampling form.

Waste Analysis

Analysis of waste streams will be required to determine the chemical composition of waste that cannot be characterized by the generator's knowledge.

Analysis Parameter

The analysis parameters are indicated in the WCP and chosen based on the GAs current knowledge for each process and chemical constituent information derived from SDSs. Analysis of the selected parameters will provide sufficient information to properly manage the disposal of the wastes.

Analytical Methods

The SW-846 analytical test methods are designated in the WCP and were chosen based on the selected analysis parameters. These test methods will provide a comprehensive characterization of the chemical constituents and physical properties of each waste stream.

Laboratory Procedures

Analysis of HW samples will be performed by USAF laboratories or approved contractor laboratories. CEIE is the OPR for selecting the laboratory to analyze waste samples and ensuring that the laboratory meets all requirements specified in this WAP. The laboratory will provide the personnel, facilities, instrumentation, and materials necessary to conduct chemical and physical waste analysis IAW the methods in 40 CFR 261 Subpart C and VHWMR and any other methods incorporated by reference as indicated in 40 CFR 260.11 and VHWMR, as required. Other contractors will also provide additional general technical support as needed. This support will include collecting the sample and providing professional guidance on such issues as representative sampling, unknown product and waste stream characterization analyses, and container material compatibility when sampling. Qualifications of all professional consultants and critical personnel supplied by the contractor will be available on request.

Laboratory Certification

All laboratories will demonstrate that they are qualified and trained under one or more certification programs designed to ensure competence and integrity in the field of waste analysis. EPA, an authorized state regulatory agency, the American

Society for Testing and Materials, the American Chemical Society, the National Voluntary Laboratory Accreditation Program, the American Industrial Hygiene Association, or other accredited professional organizations, will administer such a program. An acceptable certification, at a minimum, demonstrates the ability of the laboratory to successfully analyze unknown materials provided by the administering agency.

All laboratories will abide by the EPA-approved QA/QC practices and procedures as outlined in EPA Publication SW-846, *Test Methods for Evaluating Solids Waste, Physical/Chemical Methods* third edition, to ensure that waste sampling and analysis are satisfactory. The QA/QC procedures will also be equivalent to those described in the RCRA QA Project Plans (HWD- 83D-1) or their equivalent. QA/QC procedures for all laboratories are available upon request.

Chain-of-Custody Consideration

For purposes of litigation, all laboratories will supply an accurate written record tracing possession and handling of samples from the point of collection through analysis and ultimate disposal. The laboratory will furnish a chain-of-custody form and establish written procedures to follow. All chain-of-custody procedures and forms will meet all applicable criteria. All sampling containers will have seals that will indicate whether tampering has occurred in transit. Identification labels will also be furnished with the containers.

Description of Services

All laboratories will provide sampling containers constructed of a material compatible with the waste type to protect container integrity in transit. Possible analytical interference imparted to waste from a container material will be taken into account when designating particular container types. The laboratory will provide specialized containers and chemicals when necessary to preserve sample integrity.

On completing an analysis, the laboratory will provide to the installation a report including:

- An identifying sample number.
- Date of sample receipts.
- Date of sample analysis.
- Date of report.
- A description of the analytical method(s) used.
- The result of applying the method(s) to a particular sample.
- An explanation of units used to report the results.
- An explanation of the sensitivity (i.e., detection limits) of the instrumentation or the method itself.
- A measure of the reliability of the result; the name of the person(s) sampling and conducting the analysis.
- A certification signed by an authorized representative stating that the analysis was performed within acceptable limits according to

QA/QC specifications.

CEIE personnel will use the report and determine whether the waste meets or does not meet the definition of hazardous or when tested under 40 CFR Part 268 and VHWMR, may or may not be land disposed without further treatment.

Sample Return or Disposal. Unless directed otherwise by CEIE, the laboratory will dispose of all waste samples. All laboratories will provide certification that the laboratory facilities to be used qualify for the exemption in 40 CFR 261.4(d) and VHWMR, which excludes waste samples from many HW management requirements. Also, all laboratories will provide JBLE-Eustis with an explanation of the disposal practices employed concerning sample residual.

Appendix B: HW Inventory

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
ETT1401	10 BN	TA18	O395-0243 V3	395	WATER, CONTAMINATED, (NONHAZARDOUS LIQUID)395	
ES11001	128 AVIATION BRIGADE	27510	0113-0371 V3	113	WIPES C/W SPENT SOLVENTS	F003, F005
				132	PAINT, COATING SOLUTION	D001
				357	PHOTO COPYING CHEMICAL LIQUID (NON-HAZARDOUS)	N/A
ES18003	128 AVIATION BRIGADE	2413	0134-0338 V3	134	HARDNER (SOLID) CHROMIUM & MEK	D007, D035
ES13010	331 TC	2702	0115-0495 V4	111	PAINT DEBRIS W/ LEAD, CHROMIUM, AND SPENT SOLVENTS	F005, D007, D008, F003, D035
ET99002	3RD PORT	438	0101-0137 V3	101	ACID, SULFURIC	D002
				103	OXYGEN GENERATING DEVICES (OBA), (EEBD)	D001, D003, D005
				130	ADHESIVES, IGNITABLE W/MEK	D035, D001
				132	PAINT, COATING SOLUTION	D001
				137	PAINT, IGNITABLE W/ LEAD, CHROMIUM, MEK	D007, D008, D001, D035
				145	GREASE W/LEAD	D008
				311	ABSORBENTS C/W OIL & WATER (>10% LIQUID)	N/A
				315	DEBRIS, ABSORBENTS, DRY SWEEP, RAGS, SOIL (NON-HAZARDOUS SOLID)	N/A

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
				345	GREASE (NON-HAZARDOUS)	N/A
				347	WATER C/W PETROLEUM PRODUCTS (NON-HAZARDOUS)	N/A
				352	NBC: DECON KIT M291, M295	N/A
				354	PART WASHER, WATER (NONHAZARDOUS)	N/A
				356	FIRE EXTINGUISHING CHEMICAL, AQUEOUS FILM FORMING FOAM (AFFF)	N/A
				358	WATER TREATMENT, CLEANING, COOLING, CORROSION INHIBITOR, NON-HAZARDOUS	N/A
				381	CLEANING COMPOUNDS, SOLID	N/A
				386	POLISH, FLOOR FINISH, NON-BUFFING	N/A
				835	PAINT, LATEX, LIQUID FOR RECYCLING	N/A
ES12008	508 T DET	2743	0312-0072 V3	312	DRY SWEEP C/W PETROLEUM PRODUCTS, WATER, ANTIFREEZE	N/A
ET18001	53 TRANS	868	0312-0072 V3	312	DRY SWEEP C/W PETROLEUM PRODUCTS, WATER, ANTIFREEZE	N/A

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
ET12002	567 ICTC	836	165-0309 V1	311	ABSORBENTS C/W OIL & WATER (>10% LIQUID)	N/A
				312	DRY SWEEP C/W PETROLEUM PRODUCTS, WATER, ANTIFREEZE	N/A
				315	DEBRIS, ABSORBENTS, DRY SWEEP, RAGS, SOIL (NON-HAZARDOUS SOLID)	N/A
ES05003	MCDONALD HEALTH CLINIC	576	0151-0405 V4	151	MEDICAL MICROSCAN WASTES(LIQUID)	D001, D002
				160	ALCOHOL, METHANOL (SPENT)	D001, F003
ES05009	MCDONALD HEALTH CLINIC	576	0101-0610 V3	101	ACID, TRICHLORO ACETIC, SOLUTION	D002
				151	TINCTURES (ACETONE, ETHANOL, METHANOL, GLYCERINE, BENZOIN, P UHC CODES:166	D001
				160	ALCOHOL, METHANOL (SPENT)	D001, F003
ES14007	MCDONALD HEALTH CLINIC	576	0151-0503 V4	151	Hazardous Wastes - Medical, Food Grade	U248, P001, U205, D001, P042, P204, P075, P081
ET18002	SEAPORT OPERATIONS SUPPLY, 7TH SUSTAINMENT BRIGADE	836	0312-0072 V3	312	DRY SWEEP C/W PETROLEUM PRODUCTS, WATER, ANTIFREEZE	N/A

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
EN05005	AMCOM	2411	0381-0043 V3	381	CLEANING COMPOUNDS, SOLID	N/A
				523	UW BATTERIES, LITHIUM METAL	N/A
EN05004	ADDE METAL SHOP	3509	0347-0328 V3	347	WATER C/W PETROLEUM PRODUCTS (NON-HAZARDOUS)	N/A
				395	WATER, CONTAMINATED, (NON-HAZARDOUS LIQUID)	N/A
ES98012	AUTO CRAFT SHOP	660	0118-0005 V3	118	FILTERS, FUEL C/W BENZENE	D018
				312	DRY SWEEP C/W PETROLEUM PRODUCTS, WATER, ANTIFREEZE	N/A
EN16001	CED/OF FIRE TECHNICIANS SHOP	2750	0313-0686 V2	313	DEBRIS (RAGS, WIPES, PADS) W/UREA	N/A
				395	WATER, CONTAMINATED, (NONHAZARDOUS LIQUID)	N/A
EN13003	CED/OF MAINT SUPPLY	1406	0376-005 V4	376	ASBESTOS CONTAINING MATERIAL (ACM)	N/A
				835	PAINT, LATEX, LIQUID FOR RECYCLING	N/A
ES13005	JBFE 0110-CED/OF HVAC SHOP B1411	B1411	0312-0072 V3	312	DRY SWEEP C/W PETROLEUM PRODUCTS, WATER, ANTIFREEZE	N/A
ES11005	CEIE-HWAF	1208	0118-0398 V4	118	FILTER, AEROSOL CAN PUNCTURER UHC CODES:106 137 183 187 197 3 D035	D035, D040, D039

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
				138	CAN PIERCING MACHINE RESIDUE UHC CODES:135 187 190 194 71	D018, D001, D008, D039, D040, D035, D007
				192	AEROSOL, FLAMMABLE, LAB PACK	D001
ET10001	CEIE-HWAF	1208	0113-0366 V3	113	RAGS, (PAPER, CLOTH) C/W BENZENE	D018
				122	Hazardous Wastes-Batteries-Lead Acid	D002, D008
				130	ADHESIVES, IGNITABLE W/MEK UHC CODES:108 166 38	D035, D001
				133	EPOXY, RESIN SOLUTION W/CHROMIUM AND MEK	D007, D001, D035
				134	EPOXY HARDENER, IGNITABLE W/CHROMIUM, MEK	D001, D007, D035
				137	PAINT, IGNITABLE W/ LEAD, CHROMIUM, MEK	D007, D008, D001, D035
				175	POTASSIUM & SODIUM CHLORATES	D001, D003
				182	CLEANING COMPOUND, STRIPPER	D002
				192	AEROSOL, FLAMMABLE, LAB PACK	D001
				301	ACID, BORIC	N/A
				312	DRY SWEEP C/W PETROLEUM	N/A

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
					PRODUCTS, WATER, ANTIFREEZE	
				314	SOIL/SAND C/W PETROLEUM PRODUCTS, WATER, ANTIFREEZE	N/A
				315	DEBRIS C/W ACID	N/A
				331	JOINT COMPOUND	N/A
				356	FIRE EXTINGUISHING CHEMICAL, AQUEOUS FILM FORMING FOAM (AFFF)	N/A
				381	CLEANING COMPOUND, DETERGENT GENERAL PURPOSE (LIQUID)	N/A
				386	POLISH, FLOOR FINISH, NON-BUFFING	N/A
				523	UW BATTERIES, LITHIUM METAL	N/A
				526	UW BATTERIES, NICAD, (DRY) (CONTAINS POTASSIUM HYDROXIDE)	N/A
				597	UNIVERSAL WASTE LIGHTBULBS	N/A
				821	BATTERIES, ALKALINE, DRY, NON RECHARGEABLE FOR RECYCLING	N/A
				835	PAINT, LATEX, LIQUID FOR RECYCLING	N/A
ES12001	EMC	2715C	304-0500 V1	347	WATER C/W PETROLEUM PRODUCTS	N/A

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
					(NON-HAZARDOUS)	
				357	TONERS	N/A
				395	WATER, CONTAMINATED, (NONHAZARDOUS LIQUID)	N/A
EN05003	EQUIPMENT CONCENTRATION SITE	2505	0312-0072 V3	311	DRY SWEEP C/W PETROLEUM PRODUCTS, WATER, ANTIFREEZE	N/A
				312	DRY SWEEP C/W PETROLEUM PRODUCTS, WATER, ANTIFREEZE	N/A
				378	SLUDGE, GREASE & OIL (NONHAZARDOUS)	N/A
ES05010	EXPERIMENTAL FAB	3509	0118-0656 V3	118	FILTERS C/W CHROMIUM	D007
				130	ADHESIVES, IGNITABLE W/MEK UHC CODES:108 166 38	D035, D001
				131	COATING KIT, ALUMINUM (ALODINE 1201)	D002, D007
				133	EPOXY, RESIN SOLUTION W/CHROMIUM AND MEK	D007, D001, D035
				134	EPOXY HARDENER, IGNITABLE W/CHROMIUM, MEK	D001, D007, D035
				138	PAINT RELATED MATERIALS	F005, D018, D022, F002, F003, D035,

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
						D007, D008, D039, D040, D001, D028
				182	CLEANING COMPOUND, STRIPPER	D002
				395	WATER, CONTAMINATED, (NONHAZARDOUS LIQUID)	N/A
ES01002	FAAF	2448	0113-0366 V3	113	RAGS, (PAPER, CLOTH) C/W BENZENE	N/A
				130	ADHESIVES, IGNITABLE W/MEK UHC CODES:108 166 38	D035, D001
				131	COATING KIT, ALUMINUM (ALODINE 1201)	D002, D007
				133	EPOXY, RESIN SOLUTION W/CHROMIUM AND MEK	D007, D001, D035
				134	HARDNER (SOLID) CHROMIUM & MEK	D007, D035
				188	BLEACH, SODIUM HYPOCHLORITE & HYDROXIDE SOLUTION	D002
				312	DRY SWEEP C/W PETROLEUM PRODUCTS, WATER, ANTIFREEZE	N/A
				333	EPOXY RESIN LIQUID (BISPHENOL A RESIN BASED)	N/A

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
				345	GREASE (NON-HAZARDOUS)	N/A
				523	UW BATTERIES, LITHIUM METAL	N/A
ES14001	FIRESTONE	700	0118-0005 V3	118	FILTERS, FUEL C/W BENZENE	D018
				395	WATER, CONTAMINATED, (NONHAZARDOUS LIQUID)	N/A
ES12006	GAS STATION	700	015-0367 V3	115	DEBRIS (ABSORBENTS, DRYSWEEP, RAGS, SOIL) C/W BENZENE	D018
ET94001	HAZMAT BLDG	586	101-0193 V1	102	POTASSIUM HYDROXIDE SOLUTION	D002
				103	HYDROGEN PEROXIDE SOLUTION (>50%)	D002, D001
					Hazardous Wastes-General Chemicals, Ac	U044, D022
				137	PAINT, IGNITABLE W/ LEAD, CHROMIUM, MEK	D007, D008, D001, D035
				151	TINCTURES (ACETONE, ETHANOL, METHANOL, GLYCERINE, BENZOIN, P UHC CODES:166	D001
				182	CLEANING COMPOUND, STRIPPER (SODIUM HYDROXIDE, SODIUM METASILICATE) LIQUID	D002

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
				183	CLEANING COMPOUND, CHROME CYLINDER (ACID)	D002
				330	ADHESIVES & SEALANTS, SOLID, LATEX, (NON-HAZARDOUS)	N/A
				346	LUBRICANTS & FLUIDS NON HAZARDOUS LIQUIDS	N/A
				381	CLEANING COMPOUND, DETERGENT GENERAL PURPOSE (LIQUID)	N/A
ET04001	HHC	845A	0108-0329 V3	108	ENGINE STARTING FLUID (GAS)	D001
				152	NBC: FILTER ELEMENTS (M17A1,M17A2 MASK, M40 MASK) C2	D011, D007
				312	DRY SWEEP C/W PETROLEUM PRODUCTS, WATER, ANTIFREEZE	N/A
				352	NBC KIT COMPONENTS, SOLID (NON HAZARDOUS) M2, M3, M9, M13, M273	N/A
ES15001	HQ HEADQUARTERS COMPANY	1010	0331-0106 V3	331	JOINT COMPOUND	N/A
				835	PAINT, LATEX, LIQUID FOR RECYCLING	N/A
ET96001	JRRF	2606	0315-0049 v3	315	DEBRIS, PAINT	N/A
				345	GREASE (NON-HAZARDOUS)	N/A

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
				773	PCB - Investigation Derived, Sampling	N/A
EN13001	LRC MAINT DIV	2750	0312-0072 V3	312	DRY SWEEP C/W PETROLEUM PRODUCTS, WATER, ANTIFREEZE	N/A
ET13001	LRC MAINT DIV	B1411	0311-0171 V3	311	ABSORBENTS C/W OIL & WATER (>10% LIQUID)	N/A
				354	PART WASHER, WATER (NONHAZARDOUS)	N/A
				384	CLEANING COMPOUND, PETROLEUM BASED (COMBUSTIBLE LIQUID)	N/A
ES13008	LRC MAINT DIV - BLAST FRONT - VECTOR	B1411	0115-0495 V4	115	PAINT DEBRIS W/ LEAD, CHROMIUM, AND SPENT SOLVENTS (F003, F0 UHC CODES:137 55 69	F005, D007, D008, F003, D035
				138	PAINT, AND SPENT SOLVENTS W/ CHROMIUM (F003, F005)	D007, D001, F003, F005
				316	BLASTING, MEDIA, ALUMINA, ZIRCONIA MIXTURE	N/A
ES13002	LRC MAINT DIV - BLAST OUTSIDE REAR	B1411	0138-0527 V4	138	PAINT, AND SPENT SOLVENTS W/ CHROMIUM (F003, F005)	D007, D001, F003, F005
				316	BLASTING, MEDIA, ALUMINA, ZIRCONIA MIXTURE	N/A

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
ES13003	LRC MAINT DIV - BLAST OUTSIDE REAR	B1411	0316-0354 V3	316	BLASTING, MEDIA, ALUMINA, ZIRCONIA MIXTURE	N/A
				376	ASBESTOS CONTAINING MATERIAL (ACM)	N/A
ES13004	LRC MAINT DIV - CE SHOP	B1411	0316-0354 V3	316	BLASTING, MEDIA, ALUMINA, ZIRCONIA MIXTURE	N/A
				523	UW BATTERIES, LITHIUM METAL	N/A
ES13007	LRC MAINT DIV - INSIDE PAINT	B1411	0115-0495 V4	115	PAINT DEBRIS W/ LEAD, CHROMIUM, AND SPENT SOLVENTS (F003, F0 UHC CODES:137 55 69	F005, D007, D008, F003, D035
				138	PAINT, AND SPENT SOLVENTS W/ CHROMIUM (F003, F005)	D007, D001, F003, F005
ES13006	LRC MAINT DIV - NEW PAINT	1411	0138-0527 V4	138	PAINT, AND SPENT SOLVENTS W/ CHROMIUM (F003, F005)	D007, D001, F003, F005
				316	BLASTING, MEDIA, ALUMINA, ZIRCONIA MIXTURE	N/A
ES18002	LRC/MSD HEAVY MAINT, MATERIAL SUPPORT DIVISION	1411	0316-0354 V3	316	BLASTING, MEDIA, ALUMINA, ZIRCONIA MIXTURE	N/A
ES16001	MEDICAL DEPARTMENT ACTIVITY (MEDDAC)	576	157-0493 V2	313	DEBRIS (RAGS, WIPES, PADS) W/UREA	N/A
ES14002	PHARMACY 1ST FLOOR	576	0151-0498 V3	151	MEDICINE EMPTY P-LISTED	P001, P081,

APPENDIX B: JBLE-EUSTIS HW INVENTORY						
Waste Site Number	**Shop Code – Shop Name**	**Waste Site Location/Bldg.**	**Waste Profile Number**	**Waste Stream Number**	**Waste Stream Description**	**Waste Codes**
					CONTAINERS & NON REVERSE DISTRIBUTED	P204, P042, P075, P188, U248
ES13001	SIKORSKY AEROSPACE MAINTENANCE INC.	2413	0101-0579 V3	101	ACID, PHOSPHORIC	D002
ES10001	US FALCON	2413	0130-0053 V4	130	ADHESIVES, IGNITABLE W/MEK UHC CODES:108 166 38	D035, D001
				132	PAINT, COATING SOLUTION	D001
				133	EPOXY, RESIN SOLUTION W/CHROMIUM AND MEK	D007, D001, D035134
				134	EPOXY HARDENER W/MEK	D001, D035
				137	PAINT, IGNITABLE W/ LEAD, CHROMIUM, MEK	D007, D008, D001, D035
				160	ALCOHOL, ISOPROPANOL	D001
				168	PAINT REMOVER, STRIPPER, METHYLENE CHLORIDE, PHENOL, SODIUM	D007
				345	GREASE (NON-HAZARDOUS)	N/A
				378	SLUDGE, GREASE & OIL (NONHAZARDOUS)	N/A

Appendix C

HWAF Site Evaluation Pickup Checklist FEVA Form 32-641

Appendix C: HWAF Site Evaluation Pickup Checklist FEVA Form 32-641

Activity Names from EMP 4.4.2
1. MACOM/Wing Name (Column C):

2. Inspection Date:

3. Group/Brigade Name (Column E): _____

6. Site Number: _____

4. Squadron/Battalion Name (Column G): _____

5. Unit Name (Column I): _____

7. Summary of findings:

	Significant Findings	Compliance Findings	Repeat & CO Findings	Minor Findings	Major Findings
Hazardous Waste Management (HWM):	**Totals:**				

Activities will make on the spot corrections or take immediate action to correct findings noted during the inspection. (See Root Causes & Findings Definitions)

8. Inspector's Comments: _____

9. Date Signed by HWAF Staff: _____ _____ _____

HWAF Staff Printed Name **HWAF Staff Signature**

10. CED - CEIE Comments: _____

11. Date Signed by AEC/HWC: _____ _____ _____

AEC:
HWC:

Printed Name of AEC or HWC **AEC or HWC Signature**

NOTE: Reports having findings must submit the ACAP. Reports which do not have findings, no further action is required. Activities will submit an Activity Correction Action Plan (EMP 4.5.2.3.1 Tab 1 ACAP Summary Report FEVA Form 32-601) NLT the date specified on the inspection report below IAW EMP 4.5.2.3.1, paragraph 6.B.3. If the ACAP is not received by the specified date, a memo will be sent through the MSG Commander to the Commander or Director.

Appendix C

HWAF Site Evaluation Pickup Checklist FEVA Form 32-641

CED-CEIE Use Only

12. Date ACAP due to CED-CEIE:_____ **13. Date ACAP Received by CED-CEIE:** _____

Appendix C

HWAF Site Evaluation Pickup Checklist FEVA Form 32-641

Media Area	Inspection Item	Finding Type	YES	NO	N/A	Building Number(s)	Root Cause	Comments
Hazardous Waste Management (HWM)								
Pick UP 1	Does the Activity have Activity Environmental Coordinator (AEC)? **Name:**	MMSF						
Pick UP 2	Does the Activity have Alternate AEC? **Name:**	MMSF						
Pick UP 3	Hazardous Waste Coordinator (HWC): **Name:**	CF						
Pick UP 4	Alternate HWC: **Name:**	CF						
General Site Requirements								
Pick UP 5	Is the AEC or HWC Present and on time for pickup?							
Pick UP 6	Are Turn-in documents complete and ready at the scheduled appointment?							
Pick UP 7	Does the site have an up to date Functional Area Continuity Book (FACB)? Date:	MMSF						
Pick UP 8	Does the site have an up to Hazardous Waste Minimization (HazMin) Plan? Date:	CF						
Pick UP 9	Does Activity have an up to date site-specific Contingency Plan and posted at the site? Date:	CF						
Pick UP 10	Does Activity maintain copies of all HWM records for 3 years?	CF						
Pick UP 11	Is the site inspected weekly?	CF						
Pick UP 12	Are the most up to date Weekly TSS, SAS, & NHS Inspections FEVA Form 32-698 being used IAW EMP 4.4.6.8.2 Tab 2? Date of form:	MMSF						
Pick UP 13	Is an up to date (Annually) Waste Description Log (WDL) for each waste stream available (FEVA Form 697)?	CF						
Pick UP 14	Are the most up to date Waste Description Log FEVA Form 32-697 being used? Date of form:	CF						
Pick UP 15	Does Activity maintain a Container Turn-in Log (CTL) for each calendar year?	MMSF						
Pick UP 16	Are the most up to date Container Turn-in Log FEVA Form 32-696 being used IAW EMP 4.4.6.8.1 Tab 4? Date of the form:	MMSF						
Pick UP 17	Does the site have a sign indicating type of storage area?	MMSF						
Pick UP 18	Does the site have a "NO SMOKING" sign?	MMSF						
Pick UP 19	Does the site have "Unauthorized Personnel Keep Out" sign?	MMSF						
Pick UP 20	Does the site have up to date emergency response information posted at the site?	CF						

Appendix C

HWAF Site Evaluation Pickup Checklist FEVA Form 32-641

Media Area	Inspection Item	Finding Type	YES	NO	N/A	Building Number(s)	Root Cause	Comments
Pick UP 21	Are telephones, two-way radios, or similar alarm devices located near the site?	MMSF						
Pick UP 22	Does the site have portable fire extinguishers?	CF						
Pick UP 23	Does the site have a spill kit?	CF						
Pick UP 24	Does the site have an "Incompatibility" chart?	MMSF						
Pick UP 25	Is the site protected from the elements?	MMSF						
Pick UP 26	Does the site have containment insufficient capacity to hold 110% of volume of the largest container in the site?	CF						
Pick UP 27	Is containment system clean and dry at all times	MMSF						
Pick UP 28	Does the site have adequate aisle space to allow for the unobstructed movement of fire equipment, spill control, and other personnel in an emergency?	CF						
Pick UP 29	Is proper housekeeping being maintained?	MMSF						
	Container Requirements							
Pick UP 30	Are all containers of wastes correctly labeled as HWs, UWs, or NHWs?	CF						
Pick UP 31	Are accumulation start dates marked on the labels of all HW and UW containers as required?	CF						
Pick UP 32	Are containers stored to allow easy access to labels?	CF						
Pick UP 33	Are containers in good condition, i.e., no signs of bulges, leaks, damage, or corrosion?	CF						
Pick UP 34	Are containers kept tightly closed during storage?	CF						
Pick UP 35	Are containers compatible with the waste stored in them?	CF						
Pick UP 36	Are containers compatibly stored, i.e., ignitable wastes are separated from reactive wastes, strong acids and bases are separated, etc.?	CF						
Pick UP 37	Are containers being kept on pallets?	CF						
Pick UP 38	Are all empty containers labeled as "empty"?	CF						
Pick UP 39	Are only DOT approved containers being used to store wastes?	CF						
Pick UP 40	Does Activity maintain a Container Contents Logs (CCL) for each container of waste?	CF						

Place an **Color Code and Fill the Response Blocks as Indicated**

CF NO = X	MMSF NO = N	MMSF NO = R

Appendix C

HWAF Site Evaluation Pickup Checklist FEVA Form 32-641

Codes	Root Cause Category	Root Cause Descriptions
Command Emphasis and Oversight		
	Management (CM)	
CM01	**CM**	Environmental management is not aware of or has misinterpreted the regulations.
CM02	**CM**	Management review process supporting, controlling, or improving daily/contract operations is absent or inadequate.
CM03	**CM**	Environmental responsibilities are not clearly defined in position standards or understood by personnel.
CM04	**CM**	Management functions within the organizational structure are not afforded appropriate priority to support the environmental program, ensuring mission readiness.
	Policy (CP)	
CP01	**CP**	Strategic planning or formal policies of environmental protection and stewardship are not established or are deficient.
CP02	**CP**	Formal policies are not issued from an appropriate level of authority.
Plans and Implementation		
	Communications (IC)	
IC01	**IC**	Communication with external agencies is ineffective.
IC02	**IC**	Communication channels within the organization are ineffective.
	Implementation (II)	
II01	**II**	Document control or retention for reporting and tracking is absent or is inadequate.
II02	**II**	Personnel ignores or is not held accountable for established environmental plans, policies or procedures.
II03	**II**	Personnel do not consistently follow established environmental plans, policies or procedures.
II04	**II**	Review and follow-up of assessments, inspection programs, and identified environmental problems are not conducted or are inadequate.
	Plans (IP)	
IP01	**IP**	Environmental management plans or procedures are not in place or inadequate.
IP02	**IP**	Environmental management plans or procedures are not properly implemented.
IP03	**IP**	Review process to update existing plans, procedures, or systems is not established or is inadequate.

Appendix C

HWAF Site Evaluation Pickup Checklist FEVA Form 32-641

Codes	Root Cause Category	Root Cause Descriptions
Other (External Phenomena)		
	Other (OO)	
OO01	**OO**	Non-compliance resulted from theft, tampering, sabotage, criminal trespass, vandalism, or fire.
OO02	**OO**	Non-compliance caused by weather, ambient conditions, or acts of God.
OO03	**OO**	Compliance is dependent upon external entity action.
OO04	**OO**	To be determined by ENRD.
Resources		
	Resources (RR)	
RR01	**RR**	Funds for environmental-related activities are not sufficient.
RR02	**RR**	Staffing levels for environmental-related activities are not sufficient.
RR03	**RR**	Inadequate design or failure in equipment or material selection.
RR04	**RR**	Supplies/contracted deliverables were not correctly identified or have not been received.
Training and General Awareness		
	Training (TT)	
TT01	**TT**	General environmental awareness training is not conducted or is inadequate.
TT02	**TT**	Environmental media-specific management training is not conducted or is inadequate.

Appendix C
HWAF Site Evaluation Pickup Checklist FEVA Form 32-641

Finding Name	Code	Finding Description
Significant Finding	**SF**	Any noncompliance with federal, state, or local laws, regulations, permits, or ordinances that poses a direct and immediate threat to human health or safety, mission, and the environment.
Compliance Finding	**CF**	Compliance Finding—Any noncompliance with federal, state, or local laws, regulations, permits, or ordinances that is not a significant finding.
Minor Management System Finding	**MMSF**	A **single instance** where an Activity has failed to conform to a DoD, Army, Air Force, or installation instruction, policy, or another requirement.
Major Management System Finding	**Major**	**Multiple instances** of nonconformance to a DoD, Army, Air Force, or installation instruction, policy, or another requirement.
Potential Best Practice	**PBP**	A finding that is considered a standard of excellence or achievement considered best in class.
New Finding	**N**	A new finding is one that was identified for the first time during the current assessment.
Repeat Finding	**R**	A repeated finding is one that was identified and documented during a previous assessment that has been closed, but the same condition has reoccurred.
Carry-Over	**CO**	A carry-over finding is one that was observed and documented in a previous assessment and has remained open.

A

Appendix D

Container Contents Log – CCL FEVA Form 32-646

Sheet___of ___

1. Container Number: _____ 2. Profile No: _____ 3. HWAF Doc. Reg. No: _____

Appendix D: Container Contents Log (CCL) FEVA Form 32-646

4. Generating Activity: _____ 5. Building Number: _____

6. Authorized Site Number: _____ 7. Phone Number of HWC: _____

8. DOT Proper Shipping Name: _____

9. DOT Hazard Class: _____ 10. DOT ID Number: _____ 11. Packaging Group: _____

12. DOT Container Type: _____ 13. Size or Volume: _____

EPA REQUIRED INFO: 14. Waste Description: _____

15. ASD: _____ 16. EPA Waste Codes: _____

17. Origin Code: _____ 18. Source Code: _____ 19. Form Code: _____

20. Date of Activity	21. Type of Waste (DESCRIPTION OF CONTENTS)	22. Process Generating Waste	23. Name of Person Adding Waste	ESTIMATED QUANTITY 24. Pounds	25. Gallons

26. Comments: _____ 27. Subtotal of Additional Sheets _____ _____

28. Container Total _____ _____

29. ACTUAL WEIGHT BY HWAF:

I certify that the contents of this container have been fully and accurately described above and listed IAW all applicable federal, state, and local rules and regulations.

30. Name of HWC: Signature: Date:

31. Name of AEC: Signature: Date:

A

Appendix D

Sheet___of ___

Container Contents Log – CCL FEVA Form 32-646

1. Container Number: **2. Profile No:** **3. HWAF Doc. Reg. No:**

4. Generating Activity:_____**5. Building No.:** _____

6. Authorized Site No: _____ **DODAAC:** **7. Phone Number of HWC/AEC:** _____

8. RQ:_____**lbs.** **9. DOT ID No:**_____ **10. DOT PSN:**_____

11. DOT Hazard Class:_____**12. PG:** _____

13. DOT Container Type:_____**14. Size or Volume:**_____

EPA REQUIRED INFO: **15. Waste Description:**_____

16. ASD:_____**17. EPA Waste Codes:**_____

18. Origin Code:_____**19. Source Code:**_____ **20. Form Code:**_____

21. Date of Activity	22. Type of Waste (DESCRIPTION OF CONTENTS)	23. Process Generating Waste	24. Name of Person Adding Waste	ESTIMATED QUANTITY	
				25. Pounds	26. Gallons

26. Comments: _____

_____

_____

28. Subtotal of Additional Sheets	
29. Container Total	
30. ACTUAL WEIGHT BY HWAF:	

I certify that the contents of this container have been fully and accurately described above and listed IAW all applicable federal, state, and local rules and regulations.

31. Name of HWC:_____**Signature:**_____**Date:**_____

32. Name of AEC:_____**Signature:**_____**Date:**_____

HWAF REIMBURSABLE LOG FEVA Form 32-690

Appendix E: HWAF REINBURSABLE LOG FEVA Form 32-690

Activity: _____ **Page 1 of:** _____

DODAAC: _____

Activity Environmental Coordinator (AEC): _____

AEC Signature

AEC Phone Number: _____ **Authorized Site Number:** _____ **Date:** _____

		Description of Reimbursable Items and Charges									
Date	Description, 1348, Doc No. Manifest No.	DLA-DS HW HERT 145604 27456 53411	DLA-DS NHW HERT 145602 27456 53411	DLA-DS UW HERT 145483 27456 53415	Sampling Charges	QTY Size & Type	Container Charges	Off-spec Fuel Charges	Oily Rags/Abs Charges	Other Charges Specify	Total Line Cost
	Page 1 TOTALS:										

Page 2 Total: _____

Issued By HWAF: _____ **Date:** _____ **TOTAL:** _____

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		Description of Reimbursable Items and Charges									
Date	Description, 1348, Doc No. Manifest No.	DLA-DS HW HERT 145604 27456 53411	DLA-DS NHW HERT 145602 27456 53411	DLA-DS UW HERT 135483 27456 53415	Sampling Charges	QTY Size & Type	Container Charges	Off-spec Fuel Charges	Oily Rags/Abs Charges	Other Charges Specify	Total Line Cost

Appendix F: Monthly Universal Waste Site Inspections FEVA Form 32-695

Generating Activity: _____ Building Number: _____

Date of Turn-in	Container Number	ASD for HWs or UWs	Common Name or Description	Quantity		Cost			Name of Person Turning-in Waste
				Pounds	Gallons	HW	UW	NHW	

Appendix G

CONTAINER TURN-IN LOG FEVA Form 32-696

Appendix G: Container Turn-In FEVA Form 32-696

Generating Activity:_____ Building Number: _____

Date of Turn-in	Container Number	ASD for HWs or UWs	Common Name or Description	Quantity		Cost			Name of Person Turning-in Waste
				Pounds	Gallons	HW	UW	NHW	

Appendix H
WASTE DESCRIPTION LOG (WDL) FEVA Form 32-697

** Activity Names from EMP 4.4.2 - All Entries Must Be Typed - See WDL (cont.) for additional Space & Instructions

Page 1 of:

1. **MACOM/Wing Name (Column C): _____

2. **Group/Brigade Name (Column E): _____ **8. Bldg. No.** _____

3. **Squadron/Battalion Name (Column G): _____ **9. Site Number** _____

4. **Unit Name (Column I): _____ **10. DODAAC:** _____

5. Name and Grade of HWC: _____ **Telephone:** _____

6. Name and Grade of AEC: _____ **Telephone:** _____

7. Certification and Signature of AEC: _____ Date: _____

☐ **11. New Waste Stream** ☐ **12. Update Existing Waste Stream** **13. Site Type:** ☐ TSS ☐ SAS ☐ NHS

14. Hazardous Materials Information: (Use Continuation Sheet if Needed)

HazMart Stock Number (NSN or LPN)	Shop Code(s)	SDS ID Number	SDS Date	Trade Name or Item Name

15. List of Non-Hazardous Materials Used: _____

16. Description of How the Waste was Generated using the above Materials: _____

17. Estimated Generation Rate: Estimated Amount (Gals or lbs.): _____

18. HWAF USE ONLY: Profile No._____ HW ☐ UW ☐ NHW ☐

EPA Waste Codes:_____ Date Approved: _____

Preferred Container Size:_____ Preferred Container Type:_____

Per (day, week, and month):_____

WASTE DESCRIPTION LOG (WDL) FEVA Form 32-697

14. (Cont.) Hazardous Materials Information: (Use Continuation Sheet if Needed)				Page 2 of
HazMart Stock Number (NSN or LPN)	Shop Code(s)	SDS ID Number	SDS Date	Trade Name or Item Name

15. (Cont.) List of Non-Hazardous Materials Used:

16. (Cont.) Description of How the Waste was Generated using the above Materials:

WASTE DESCRIPTION LOG (WDL) FEVA Form 32-697

Instructions: (Entries must be typed.)

** Activity Names from EMP 4.4.2 Tab 3

1. **MACOM/Wing Name (Column C):
2. **Group/Brigade Name (Column E):
3. **Squadron/Battalion Name (Column G):
4. **Unit Name (Column I):
5. Name and Grade of HWC:
6. Name and Grade of AEC:
7. Certification and Signature of AEC:
8. Building Number of Site Location
9. Enter the Authorized Site Number in Item 1. This should be the site at which the waste initially accumulates
10. Enter your DODAC
11. Put an "X" in this block if this is a new waste stream
12. Put an "X" in this block if this is an update to an existing waste stream
13. Put an "X" in the appropriate block for the type of site
14. Hazardous Materials Information: (Use Continuation Sheet if Needed) - **Hazardous Material Waste Evaluation Report MUST be attached - Received when product issued - ALL SDSs MUST BE LISTED and INCLUDED**

    Enter the HazMart Stock Number NSN or LPN
    Enter the Shop Code(s) where the waste was generated
    Enter the SDS ID Number from the Hazardous Material Waste Evaluation Report - Received when product issued
    Enter the SDS Date from the Hazardous Material Waste Evaluation Report - Received when product issued
    Enter Trade Name or Item Name from the Hazardous Material Waste Evaluation Report - Received when product issued
    If the waste stream has analytical data, then provide a copy of the data and enter "See Attached Data" in the NSN block.

15. In Item 10, list all of the non-hazardous components of the waste stream. **Items that have SDSs must be listed in Block 14 and not in this Block**
16. Provide a brief description of how the waste stream was generated. This description should be from 1 to 2 sentences long. This statement must include an estimate of how much of each hazardous and non-hazardous materials are in the waste stream.
17. Estimated Generation Rate: Estimate the amount of waste to be generated in gallons (gals) or pounds(lbs.) per period of time (day, week, or month)
18. HWAF USE ONLY:

NOTE: The WDL Must be reviewed an updated as needed, but at least annually!

Appendix H

WASTE DESCRIPTION LOG (WDL) FEVA Form 32-697

The WDL must accurately describe the chemical and physical characteristics of the contents of the container as it is being turned-in and provide a description of how the waste was generated! For containers which are receiving wastes from multiple locations (3rd Port for example), the consolidated container must be accurately reflect the contents. If might be a good practice to have personnel bringing wastes from the individual locations for consolidate to complete a mini WDL for the Waste site HWC/AEC.

Appendix I: Weekly TSS, SAS, and NHS Inspections FEVA Form 32-698

Generating Activity: Authorized Site No. TSS ☐ SAS ☐ NHS ☐ HWAF ☐

Inspector Must Check All Applicable Site Items

INSPECTION ITEMS: **Weekly inspections must be conducted within 7 calendar days of the last inspection.**

1. Does the area have signs indicating the type of TSS, SAS, or NHS storage?
2. Does the area have "No Smoking" signs?
3. Does the area have "Unauthorized Personnel Keep Out" signs?
4. Does the area have a sign for Emergency Notification Instructions?
5. Does the site have a copy of the Contingency Plan (CP) posted?
6. Does the site have adequate aisle space?
7. Is communication equipment (telephone, radio, etc.) available and operational?
8. Are fire extinguishers available? Charged? Are seals intact?
9. Is the spill kit available and serviceable?
10. Are drums available for over packing leaking containers or spills?
11. Are wastes stored with adequate containment? Sheltered from the environment?
12. Are the containers DOT approved?
13. Are the containers serviceable? (Free of dents, rust, leaks, etc.)
14. Are bungs/rings secured? Are containers tightly closed?
15. Is a Container Contents Log present & complete for each container?
16. Is the Waste Description Log with MSDSs present for each waste stream?
17. Are containers adequately labeled as required? (HW, UW, NHW, DOT, Empty)
18. Are the containers compatible with the stored materials?
19. Are wastes separated from serviceable materials?
20. Are incompatible wastes separated from other wastes?
21. Does container have unique container number?
22. Is the correct generator or shipper address present?
23. Is DOT proper shipping name & UN/NA on HW labels?
24. Are Accumulation Times being met? SAS 3 Days; TSS 14 Days, UW 270 Days
25. Are EPA waste codes correct for HW labels?
26. Is accumulation start date on HW and UW labels as required?
27. Is Emergency Eye Wash & Shower Operable? Weekly Monthly?
28. Is PPE (goggles, gloves, boots, respirators, etc.) available/serviceable?
29. Is the area secured when not in use?
30. Are only HW, UW, or NHW are accumulated in TSS or SAS?
31. Are only NHW, UW, Used Oil, Recyclables stored in NHS? No HW!
32. Are any containers stored longer than 75 days at the HWAF?

DATE	TIME	NAME OF INSPECTOR	OBSERVATIONS	CORRECTIVE ACTIONS & DATE

Appendix J: TSS, SAS, and NHS Site Approval FEVA Form 32-699

Forms Must Be Typed

1. Request Date: _____ 2. Type of Accumulation Site: ☐ TSS ☐ SAS ☐ NHS

Type of Approval requested: (Check Only One)

☐ 3. Initial Notification of New SAS
☐ 4. New Accumulation Site
☐ 5. Relocation of an Existing Site
☐ 6. Closure of an existing site

7. Temporary Action: Inactivation Reactivation Date by Activity:

Generating Activity: 8. Building Number of Site:

** Activity Names from EMP 4.4.2 Tab 3 9. DODAAC:

10. **MACOM/Wing Name (Column C): _____
11. **Group/Brigade Name (Column E): _____
12. **Squadron/Battalion Name (Column G): _____
13. **Unit Name (Column I): _____

14a. Name and Grade of HWC: _____ Telephone:

14b. Name and Grade of AEC: _____ Telephone:

New Accumulation Site Requirements:

☐ 15. Copy of Site Map
☐ 16. Copy of Site Specific Contingency Plan (CP)
☐ 17. Copy of Waste Description Logs (WDL)

Closure of an Existing Site Requirements: 18. Existing Site Number: _____

Date Closed by Activity: _____

19. Certification that no wastes are stored or will be stored at the site. ☐ Certified
20. Has there ever been a spill at this site? ☐ Yes ☐ No
21. If a spill has ever occurred, has the site been decontaminated? ☐ Yes ☐ No
22. Copy of the last "Weekly Site Inspection" Checklist ☐ Included

23. I certify that the above information is complete and accurate.

Date: _____ Signature

Name of Battalion Commander or Director:

Telephone: _____ _____

Title and Rank/Grade:

Approvals:

24. Post Safety Office: _____ _____
Name and Title: Date

25. Post Fire Department: _____ _____

Appendix J

TSS, SAS, and NHS Site Approval FEVA Form 32-699

Name and Title: Date

CED/CEIE Approval:

26. Date of Final Approval: _____ 27. Authorized Site Number:

28. Date of Intact/React: _____ 29. Date of Final Closure:

Signature of CED/CEIE Personnel

Appendix J

TSS, SAS, and NHS Site Approval FEVA Form 32-699

INSTRUCTIONS - **Forms Must Be Typed To Be Acceptable**

ITEM 1: Check either the Inactivation or Reactivation block. Complete items 19, 22, and 23 for Inactivation's or item 23 for Reactivations. AECs may sign the certification. Sent to CED/CEIE within 3 working days.

ITEM 2: Check either the TSS (Temporary Storage Site) block; the SAS (Satellite Accumulation Site) block; or the NHS (Non-Hazardous Site) block depending on which type of site is involved.

ITEM 3: Within 3 working days of creating a new SAS or NHS, this form must be received by CED/CEIE. Check item 3 and complete items 8 through 17 and Block 23. The Contingency Plan (CP) may be a draft and the AEC may sign the certification.

ITEM 4: For all TSSs, SASs, or NHSs, which will be established for longer than 30 days, check item 4, complete items 8 through 18, and items 23 through 25 before submitting to CED/CEIE. The commander or director must sign the certification.

ITEM 5: All requests for relocations must be coordinated with CED/CEIE before any move is accomplished.

ITEM 6: Check item 6 and complete items 8 through 14 and items 19 through 23 before submitting to CED/CEIE.

ITEM 7: Check either the Inactivation or Reactivation block. Complete items 19, 22, and 23 for Inactivation's or item 23 for Reactivations. AECs may sign the certification. Sent to CED/CEIE within 3 working days.

ITEM 8: Enter the building number of the site or closest building to the site.

ITEM 9: Enter the DODAAC number, which will be used, on the DD Form 1348-1A.

ITEM 10: Enter the MACOM/Wing Name (EMP 4.4.2 Tab 3 Column C)

ITEM 11 Enter the Group/Brigade Name (EMP 4.4.2 Tab 3 Column E)

ITEM 12: Enter the Squadron/Battalion Name (EMP 4.4.2 Tab 3 Column G)

ITEM 13: Enter the Unit Name (EMP 4.4.2 Tab 3 Column I)

ITEM 14a: Enter name, grade, and telephone number of the HWC.

ITEM 14b: Enter name, grade, and telephone number of the AEC.

ITEM 15: Check block and provide a copy of strip map of the site's location. It does not need to be to scale.

ITEM 16: Check block and provide a copy of the site specific Contingency Plan (CP).

ITEM 17: Check the block and provide a copy of Waste Description Logs (WDL).

ITEM 18: Enter the Site Number for the existing site.

ITEM 19: Check block to certify that: "No wastes are currently being stored or will be stored at this site."

ITEM 20: Check "Yes" if any spills have ever occurred at this site, otherwise certify a "No" response.

ITEM 21: If "Yes" to item 19, the site must be decontaminated. Check if this has been done or not done.

ITEM 22: Check block and provide a copy of the last "Weekly Site Inspection" checklist.

ITEM 23: The information listed above must be certified by the authority, which appoints the appropriate AEC.

ITEM 24: Ground Safety Office must approve the site location.

ITEM 25: F&ESF must approve the site location.

ITEM 26: CED/CEIE will issue the date of the final approval of a new TSS, SAS, or NHS.

ITEM 27: CED/CEIE will conduct a final site inspection and issue a dated last Authorized Site Number, upon receiving all approvals and associated documents.

ITEM 28: CED/CEIE will issue the date of the final approval of Inactivation or Reactivation.

ITEM 29: CED/CEIE will issue the date of the final closure.

Appendix K
Emergency Notification FEVA Form 32-700

Appendix K: EMERGENCY NOTIFICATION FEVA Form 32-700	BUILDING NUMBER:
IF ENTRY IS REQUIRED INTO THIS BUILDING - NOTIFY:	
NAME:	NAME
HOME ADDRESS / UNIT:	HOME ADDRESS / UNIT:
DUTY TELEPHONE:	DUTY TELEPHONE:
HOME OR AFTER DUTY TELEPHONE:	HOME OR AFTER DUTY TELEPHONE:
EMERGENCY DIAL 911 IF CALLING FROM A CELL PHONE - LET 911 KNOW YOU ARE ON FORT EUSTIS	

PRIVACY ACT STATEMENT AUTHORITY: Title 5 U.S.C. 552a and 44 U.S.C. 310.

PURPOSE: Emergency Notification Poster is attached to the front door of buildings. The name, home address, and telephone number are required to ensure persons can be contacted in case the building is left unlocked, is broken into or some situation that does not constitute breaking doors/windows.

ROUTINE USE: Emergency Notification Poster will be attached to the front door of the building. The home address and telephone number will be used to contact you in case of an emergency, i.e., doors and windows found unlocked, broken into, or some situation that does not constitute breaking doors/windows (i.e. Fire Alarm Trouble Notification).

DISCLOSURE AND EFFECT ON INDIVIDUAL: Disclosure of your home address and telephone number is voluntary/if not furnished, you cannot perform duties as building custodian or alternate custodian of property for which you are responsible. If the building custodian home address and telephone number are not provided on this form, the building custodian must provide and **keep updated information in the Ft Eustis Emergency Communications Center at (757) 878-1008.**

Individuals whose signatures appear below have read the preceding and consent to the disclosure of personal information recorded thereon.

PRINTED NAME	SIGNATURE

Appendix L

Site Pickup Evaluation/Inspection Check List

Appendix L: Site Pickup Evaluation/Inspection Check List

Generating Activity: _____ Building Number: _____

HWC: _____ Phone#: _____

Authorized Site No: _____

Items to be checked:

		Yes	No
1	Does the area have the appropriate Site Accumulation Sign?		
2	Does the area have "No Smoking" signs?		
3	Does the area have "Unauthorized Personnel Keep Out" signs?		
4	Does the area have a sign for Emergency Notification Instructions?		
5	Does the site have copy of Contingency Plan posted?		
6	Does the site have adequate aisle space		
7	Is communication equipment (telephone, radio, etc.) available		
8	Are fire extinguishers available? Charged? Are seals Intact?		
9	Is the spill Kit available? Serviceable?		
10	Are drums available for over packing?		
11	Are wastes stored with adequate containment? Protected?		
12	Are containers DOT approved?		
13	Are containers in good shape, no rust, holes, or dents?		
14	Are bungs/rings secured? Tightly closed?		
15	Are CCLs (Container Contents Logs present & completed?		
16	Is current AUL (Authorized Use List) up to date?		
17	Are containers adequately labeled? Have container ? number		
18	Are containers compatible with stored materials or separated?		
19	Are wastes and materials separated?		
20	Do the labels have all the required information filled out?		
21	Is the accumulation start date on HW labels?		
22	Is AEC & HWC training up to date and current?		
23	Our weekly inspections being done and current?		
24	Does the site have a compatibility chart?		

Appendix L

Site Pickup Evaluation/Inspection Check List

Comments:_____

_____

_____

Signature of HWAF Representative: Date: