Advanced Environmental Management (AEM) Training Phase I

TEACH







Introduction



You should complete EMAC & HazCom training prior to taking this module





AEM Phase I Purpose

This Training is Required by JBLE Instruction 32-101, Environmental Management & Environmental Management Procedure (EMP) 4.4.2.

The Primary purpose is to provide Initial Prerequisite and Annual Refresher training to the Activity's Technical Advisors (TAs)

- Activity Environmental Coordinator (AEC)
- Unit Environmental Coordinator (UEC)
- Hazardous Waste Coordinator (HWC)

The Secondary purpose is to provide a training bridge for Activities without Technical Advisors (TAs) & Contract Management

- New Activities
- New personnel which will be assigned as a TA
- Temporary training for TAs whose training has expired.
- Hazardous Materials Managers (HMMs)
- Contract: CORs,
 Administrators, Project
 Managers, Quality
 Assurance Evaluators

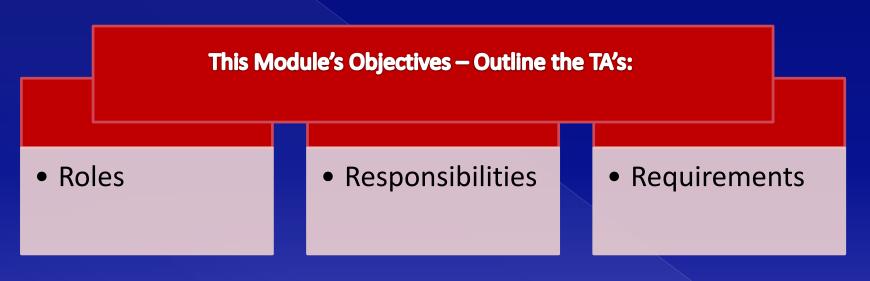
The following Leadership positions must take this Introduction to understand their TA roles & responsibilities

- Commanders at ALL levels
- Directors
- *ContractorLeadership
- Direct Line Supervisors of TAs

*TA Appointing Authority

AEM Phase I Introduction - Objectives

AEM Training: Provides detailed Environmental Management training to the Activity's Technical Advisors (TAs) who have been appointed by their Leadership



The Activity

It's Important to Understand the Definition of an "Activity", as it's a Key Concept in the Installation's Environmental Management System (EMS)

JBLE-I 32-101, Environmental Management is the Backbone to the Installation's EMS

As Defined in JBLE-I 32-101:

 "An Active Army or Air Force, National Guard or Reserve command or subcommand; 733d Mission Support Group Divisions/Squadrons; tenants (Department of Defense (DOD) or Non DOD); contractors and subcontractors; Government-Owned -Contractor-Operated facilities (GOCO); Corps of Engineers (COE) Office, Defense Logistics Agency; lessees (Army and Air Force Exchange Service [AAFES]; Defense Commissary Agency [DECA]; etc.); or any other organization."

The Technical Advisor Requirement

JBLE-132-101 Paragraph 4.4.1.2.5 Commanders, Directors, and Leaders of Activities

Paragraph 4.4.1.2.5.5

- •Appoint and ensure training of primary and alternate key Activity additional duty environmental Technical Advisor (TA) positions (Activity Environmental Coordinators (AECs), Unit Environmental Coordinators (UECs), and Hazardous Waste Coordinators (HWCs) as required.
- •Appointment, duty descriptions, and training requirements for these positions are found at EMP 4.4.2. TAs must have a business email address.
- •Job titles and duty descriptions for these positions are found in EMP 4.4.2 Tab 1.

Leadership Responsibilities

- ✓ Senior Leaders of Activities should be familiar with JBLE I 32-101 and understand their Activity's: Roles, Responsibilities, and Requirements
- ✓ Ensure the appointment and training of Technical Advisors (AECs, UECs, and HWCs)
- ✓ Technical Advisors (TA) represent and speak for the appointing Leadership during:
 - ✓ Interactions and requests from Installation Representatives and Staff
 - During Audits and Inspections by Regulators (EPA, State, and Local)
- ✓ Ensure Records are kept for 3 years Chain of custody transfers from one TA to another
- ✓ Ensure Compliance to prevent enforcement actions by the Regulators which may be civil or criminal in nature. Civil Fines can be up to \$93,500 per day per incident
- Recognize these additional duty appointments are significant and often time consuming
- ✓ Recognize that this is a TEAM effort and your TAs need your support and that of your Organization. TA contact info should be posted next to the Environmental Policy Must have open and easy access to Leadership! They cannot do this alone!
- **✓ Lastly, Ask yourself this:**
 - ✓ Do you properly Train and Supervise ALL of your personnel? Is training documented? Well Supervised?
 - ✓ Do your personnel really understand your orders when you give them?

The Technical Advisor Appointments

EMP 4.4.2 Environmental Awareness & Competency Training-AECs

(Paragraph 6.B.(a)(i)

AECs: Primary and Alternate

- •Military: Must be in the grade of Warrant Officer (WO1) or above.
- •Government Civilians: Must be in the grade of GS-11 or above or equivalent.
- •Contractors: Appropriate Management Level
- •All commands down to Battalion/Squadron/Flight or separate Company/Detachments; and Directorates down to Division or Department levels. Facility Managers must be an AEC.
- •AECs are required to have a business email address.

The Technical Advisor Appointments

EMP 4.4.2 Environmental Awareness & Competency Training-UECs (Paragraph 6.B.(a).ii)

UECs: Primary and Alternate

- •Military: Must be in the grade of E-5 or above
- •Government Civilians: Must be in the grade of GS-5 or above or equivalent.
- Contractors: Appropriate Supervisory Level.
- •All Commands below the Battalion/Squadron level; and Directorates below the Division/Department levels depending on organization.
- •UECs are required to have a business email address.

The Technical Advisor Appointments

EMP 4.4.2 Environmental Awareness & Competency Training-HWCs (Paragraph 6.B.(a).iii)

HWCs: Primary and Alternate

- •Military: Must be in the grade of E-5 or above.
- •Government Civilians: Must be in the grade of GS-5 or above or equivalent.
- Contractors: Appropriate Supervisory Level
- •Will appoint and train a primary and alternate HWC of each Temporary Storage Site (TSS), Satellite Accumulation Site (SAS) or Non-Hazardous Satellite Accumulation (NHSs) area.
- •HWCs are required to have a business email address.

DUTY DESCRIPTION: 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 the Activity's compliance with all DOD, USAF, JBLE, and JBLE - Eustis regulations, instructions and policies. Provides management oversight and assistance to the Activity's UECs, HWCs, HMMs, BREMs, and RCs.

MAJOR RESPONSIBILITIES: AEC

- ✓ Keeps the Activity's Chain of Command informed on all environmental matters.
- ✓ Coordinates communication between CEIE and the Activity.
- ✓ Ensures internal environmental management training and inspections are accomplished IAW established time frames.
- ✓ 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
- ✓ Conducts quarterly Environmental Multimedia Assessments of all subordinate Activities.
- ✓ Ensures environmental records are kept for at least 3 years
- ✓ Ensures the appointment of subordinates level UECs, HWCs, HMMs, BREMs, RCs, and other Activity environmental staff as appropriate.
- ✓ Assist the subordinate AECs, UECs, HWCs, HMMs, BREMs, and RCs in managing their environmental responsibilities.

MAJOR RESPONSIBILITIES: AEC

- ✓ Maintains the Hazardous Material Management Program (HMMP) for their Activity.
- ✓ Ensures all HMs are added to the Activity's AUL by the HazMart before purchase by using EESOH-MIS IAW EMP 4.4.6.6.1 HazMart Operations
- ✓ Ensures environmental data is reported to CEIE within the required timeframes.
- ✓ Ensures each of the Activity's functional or operational areas have a Functional Area Continuity Book (FACB).
- ✓ Coordinates new missions, new operations, construction, renovation, new system/ equipment deployment, new system/equipment testing and evaluation, and training/exercise actions with CEIE to determine the level of environmental impact assessment and subsequent environmental documentation required.

MAJOR RESPONSIBILITIES: AEC

- ✓ Signs and certifies 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.
- ✓ Maintains an up to date Activity Facilities and Operations Inventory, EMP 4.5.2.3 Tab 2
- ✓ Ensures ALL required Environmental & Competency training is completed.

Unit Environmental Coordinator (UEC)

DUTY DESCRIPTION: UEC

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.

Unit Environmental Coordinator (UEC)

MAJOR RESPONSIBILITIES: UEC

- ✓ Keeps the Unit's chain of command informed on all environmental matters.
- ✓ Coordinates communications between the AEC and Unit.
- ✓ Ensures appointment, training, management oversight, and assistance to the Unit's Universal Waste Handlers (UWHs), Building Recycling and Energy Monitors (BREMs), Recycling Coordinators (RCs), and Hazardous Materials Managers (HMMs).
- ✓ Establishes a system to track all inspections conducted at the Unit level and resolve findings.
- ✓ Maintains training and inspection files for at least 3 years.
- ✓ Maintains the Hazardous Material Management program for their Unit.
- ✓ Ensures all HMs are added to the Activity's AUL by the HazMart before purchase by using EESOH-MIS IAW EMP 4.4.6.6.1 HazMart Operations

Unit Environmental Coordinator (UEC)

MAJOR RESPONSIBILITIES: UEC

- ✓ Maintains the Unit's Energy and Natural Resources conservation program.
- ✓ Inspects HM and UW sites monthly within 30 days.
- ✓ Coordinates new missions, new operations, construction, renovation, new system/ equipment deployment, new system/equipment testing and evaluation, and training/exercise actions with the AEC.
- ✓ Ensures ALL required Environmental & Competency training is completed.

Hazardous Waste Coordinator (HWC)

DUTY DESCRIPTION: 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. The HWC is the Commander's or Leader's HW manager and Technical Advisor.

Hazardous Waste Coordinator (HWC)

RESPONSIBILITIES: HWC

- ✓ 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).
- ✓ Inspects TSSs, SASs, and NHSs weekly within seven calendar days.
- ✓ Inspects HM and UW sites monthly within 30 days.
- ✓ Ensures turn-ins of HWs & UWs are accomplished within the appropriate time limitations.
- ✓ Coordinates communications between the AEC and Unit.
- ✓ Ensures appointment, training, management oversight, and assistance to the Unit's Hazardous Waste Supervisors (HWSs), Hazardous Waste Handlers (HWHs), Universal Waste Handlers (UWHs), Building Recycling and Energy Monitors (BREMs), Recycling Coordinators (RCs), and Hazardous Materials Managers (HMMs).

Hazardous Waste Coordinator (HWC)

RESPONSIBILITIES: HWC

- ✓ Establishes a system to track all inspections conducted at the Unit level and resolve findings.
- ✓ Maintains training and inspection files for at least three years.
- ✓ Maintains the Hazardous Material Management program for their Unit.
- ✓ Ensures all HMs are added to the Activity's AUL by the HazMart before purchase by using EESOH-MIS IAW EMP 4.4.6.6.1 HazMart Operations
- ✓ Maintains the Unit's Energy and Natural Resources Conservation program.
- ✓ Coordinates new missions, new operations, construction, renovation, new system/equipment deployment, new system/equipment testing and evaluation and training/exercise actions with the AEC.
- ✓ Ensures ALL required Environmental & Competency training is completed.

Technical Advisor (TA) Summary

As a TA (AEC, UEC, or HWC), be aware of Your:

- Roles
- Responsibilities
- •Requirements

Have a working knowledge of the following:



- •4.4.2 Training-Awareness and Competency
- •4.4.1.2.5 Commanders, Directors, and Leaders of Activities
- •EMP 4.4.2 Environmental Awareness & Competency Training
- •EMP 4.4.2 Tab 1 Job Titles, Duty Descriptions, and Responsibilities of Key Positions
- •EMP 4.4.2 Tab 3 Activity Name Listings
- •EMP 4.4.2 Tab 4 AEC, UEC & HWC Appointment FEVA Form 32-643
- •EMP 4.4.2 Tab 5 ESOHTN Log-In & Training Procedures

Module Summary

- ✓ You have a now completed the first module of AEM Phase 1-Introduction training.
- ✓ There are a total of 18 modules.
- ✓ You must complete all 18 modules to receive credit for completing AEM Phase 1
- ✓ The completion date is when you complete the test at the end of module 18.
- ✓ You may take the remaining modules in any order, however it is recommended that you take Module 2-Environmental Management System next.
- Each of the remaining modules cover a specific environmental topic.

If you are in a Leadership position where you appoint TAs or are the direct line Supervisor of a TA, then you are finished. However, you should consider reviewing the remaining modules.

Environmental Management System (EMS)







The EMS Structure

- Policies
- Requirements
- Authorizes Environmental Management Procedures for implementing the policies and requirements

ISO-14001 AFI 32-7001 JBLE-I 32-101

- The Who
- The What
- The When
- The Where
- The How

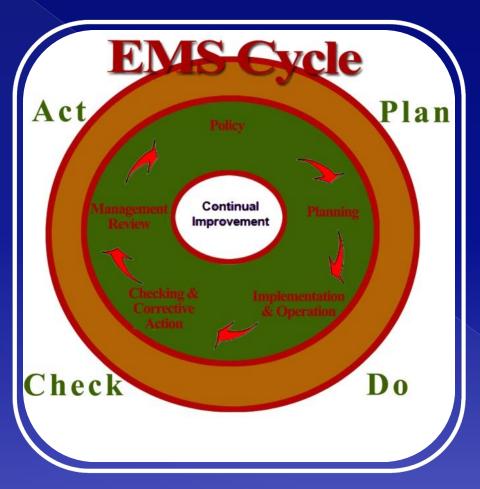
Environmental
Management
Procedures (EMPs)
articulate:

JBLE (Eustis) Sustainability Program

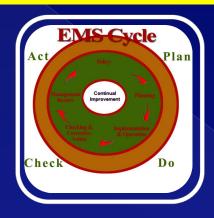
- ✓ Directive: Executive Order 13693 "Planning for Federal Sustainability in the next Decade" March 19, 2015
 - ✓ Extends requirement to reduce water consumption intensity and set new goals for 2025.
 - ✓ Divert at least 50% of non-hazardous solid waste annually, including food and compostable material but not construction and demolition (C&D) debris, and pursue opportunities to netzero waste or additional diversion opportunities.
 - ✓ Establish goals for reducing vehicle fleet GHG emission and increasing the use of zero emission or plug-in hybrid vehicles through 2025.
 - ✓ Continues requirement for promoting sustainable acquisition and procurement.
 - ✓ Revised and extends existing requirements for improving building efficiency, performance and management.
- ✓ Fort Eustis strives to integrate "sustainable" practices in all operations

JBLE Environmental Management System (EMS)

✓ JBLE uses an ISO 14001- based EMS



Key Document - Policy

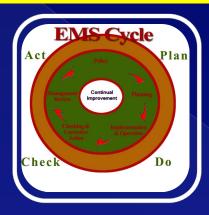


✓ AECs should know the JBLE Environmental Policy — C.L.E.A.N.

- \longrightarrow C.L.E.A.N. Card
- •Comply-with environmental federal, state, and local laws
- •Limit impact-prevent pollution, minimize waste, and protect the Chesapeake Bay
- Execute plans-follow the JBLE the JBLE (Eustis) policies and procedures
- •A chieve improvements-Make the environment everyday
- •Notify-communicate to others
- JBLE policy should be posted in work and living spaces
- C.L.E.A.N. Policy is available on a wallet size card to enhance soldier/employee knowledge

It is the responsibility of all military personnel, civilian employees and support contractors to perform their duties in a manner that prevents pollution, protects the environment, and conserves natural resources.

Planning



- ✓ Key documents AFI 32-7001 and JBLE I 32-101
- ✓ AECs should develop a "Continuity Book"
- ✓ Know specific Environmental Management Procedures
 (EMPs) for your areas and operations
- ✓ Keep records
 - ✓ Quarterly inspections
 - ✓ Appointment order/memorandum

Do and Check

- ✓ Use EMPs to manage environmental aspects of operations
 - ✓ Check area dumpsters and totters
 - ✓ Monitor energy usage (thermostats, lights)
 - ✓ Educate activity personnel
- ✓ Attend semiannual Cross Functional Team meetings (Feb & Aug)
- ✓ Brief Commander/Director on environmental challenges and opportunities



Act

- ✓ Attend the quarterly Environmental, Safety, and Occupational Health Council (ESOHC)
- ✓ Ensure ESOHC is on Commander/Director calendar. GET SENIOR LEADERS INVOLVED!
- ✓ Develop annual Activity Environmental Goals; get CED/EE involved to assist and to find funding



Information Sources

- ✓ Websites
 - ✓ Training https://esohtn.com/
- ✓ Civil Engineer Division, Environmental Element
 - **√** 878-4123

Pollution Prevention







Background of Pollution Prevention (P2)

Required by RCRA Section 6002 Defined by Pollution Prevention Act of 1990; further refined by Executive Orders

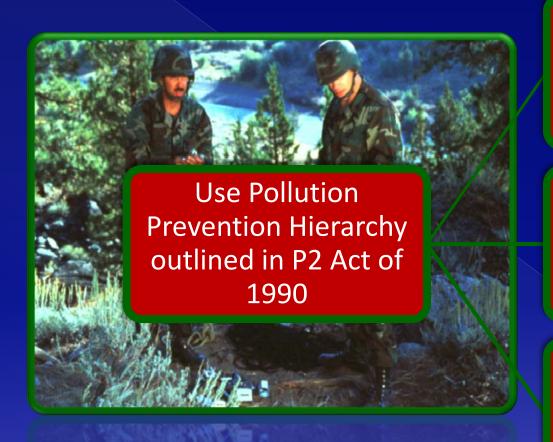
Required on EPA Biennial Report Every Federal installation must have a P2 Plan

P2 requires planning; results in saving money and protecting the environment

Opportunities for Prevention



How Do You Prevent Pollution



Source Reduction (Best)

Reuse/Recycling

Treatment/Disposal (Worst)

Source Reduction

Spill Prevention and Preventive Maintenance

HazMart

Improved Housekeeping

Improve Process
Efficiency

Buy Environmentally Preferable Products

- Material Substitution
- Affirmative Procurement
- Life cycle Considerations

Recycle, Treat, Dispose

- Reuse/Recycling
 - •Solid waste recycling includes paper cardboard, metal
 - Non-hazardous waste recycling includes antifreeze, waste oil, filters, batteries
 - •Consider recycling or reuse when source reduction is not feasible
- Treatment
 - Generally requires a permit
 - •Includes chemical detoxification or incineration
- Disposal
 - Most expensive and the least desirable option

Proper Equipment Management

Aqueous Parts Washers

Antifreeze Recycling Machines



Inland Technology Solvent Sinks

- Always follow disposal procedures concerning all equipment
- When in doubt, ask





Developing Your Activity's P2 Program

KNOW THE TYPES AND QUANTITIES OF HAZMAT NEEDED AT YOUR WORK SITE

READ SDSs

USE THE HAZMART

Know your wastestreams

Assess your equipment needs

RECYCLE IN THE SHOP AND OFFICE



Developing Your Activity's P2 Program con't



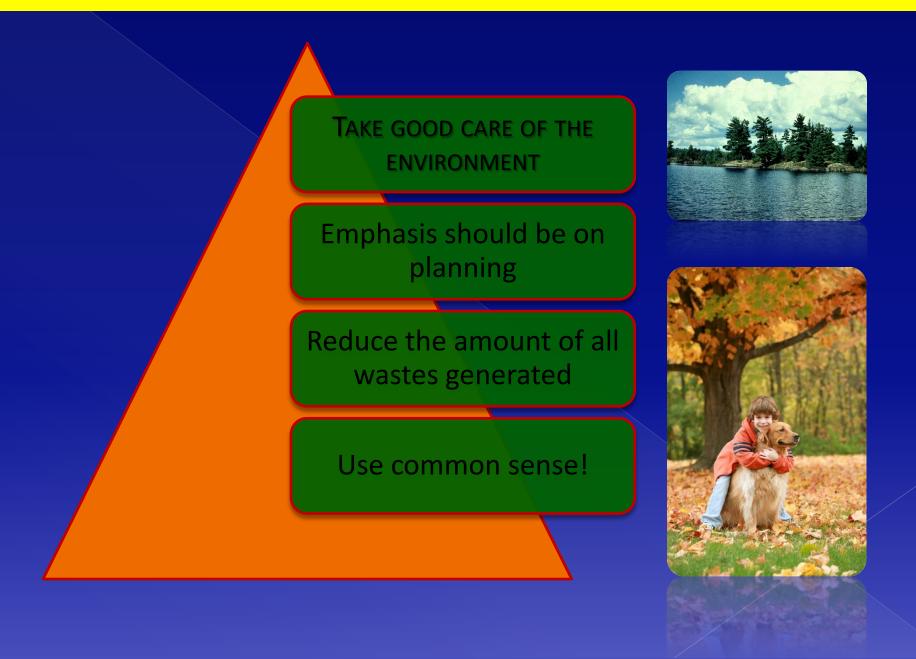




"Close the Loop" by purchasing products with post consumer content

Courtesy Inspections/ PPOAs Vendor/equip ment information

Pollution Prevention



Hazardous Materials Management (HWM) & Emergency Planning and Community Right to Know Act (EPCRA)







Objectives

- ✓ Environmental Management Procedures (EMPs)
- ✓ Commander/Director/Leadership Responsibilities
- Define Hazardous Materials (HMs)
- ✓ The HazMart Approval Process
- ✓ HazMat Compliance
 - **✓** SDSs
 - ✓ Storage
- Define Emergency Planning and Community Right to Know Act (EPCRA)
 - Inventory
 - ✓ Reporting

EMPs To Know

EMP 4.4.6.6 Installation Hazardous Materials Program (IHMP)

4.4.6.6 Tab 1-Hazardous Materials Storage and Container Management

4.4.6.6 Tab 2-Monthly Hazardous Material Site Inspections FEVA Form 32-680

EMP 4.4.6.6 Tab 3 Installation Hazardous Materials Management Process (IHMMP) Team Charter

4.4.6.6.1 –HazMart Operations

4.4.6.6.1 Tab 1-HazMart Authorization and Order Form FEVA Form 32-681

4.4.6.6.1 Tab 2 -Shop codes & Names

4.4.6.6.1 Tab 3-Process Codes

EMP 4.4.6.6.1 Tab 4 Contractor HazMart Registration Form FEVA Form 32-682

EMP 4.4.6.6.1 Tab 5 HazMart Inspection Checklist FEVA Form 32-683

EMP 4.4.6.6.1 Tab 6 Hazardous Materials Manager (HMM) Appointment FEVA Form 32-684

Commander/Director/Leadership Responsibilities

Ensure ALL Hazardous Materials (HM) are approved prior to being brought onto or used on JBLE-E, e.g., added to Authorized Use List (AUL)

Must follow all EMPs

Ensure Technical Advisors (AECs, UECs, & HWCs) are appointed at the appropriate levels. See EMP 4.4.2 Environmental Awareness and Competency Training

Ensure Primary and Alternate Hazardous Materials Managers (HMMs) are appointed. Unit personnel should know who are the TAs & HMMS. See EMP 4.4.6.6.1 HazMart Operations

Must use the EESOH-MIS tracking system to manage HMs

All containers of HMs must be Bar Coded by bar codes issued by the HazMart

Maintain a current inventory of Hazardous Materials

Maintain SDSs for all HMs. Manufacturer specific!

HMs must be stored in approved containers; properly stored; and labeled

HM storage areas must be inspected monthly

What are Hazardous Materials?

OSHA/HazCom Definition:

- ✓ Any Chemical which can cause a physical or a health hazard
- ✓ Those chemicals present in the workplace which are capable of causing harm

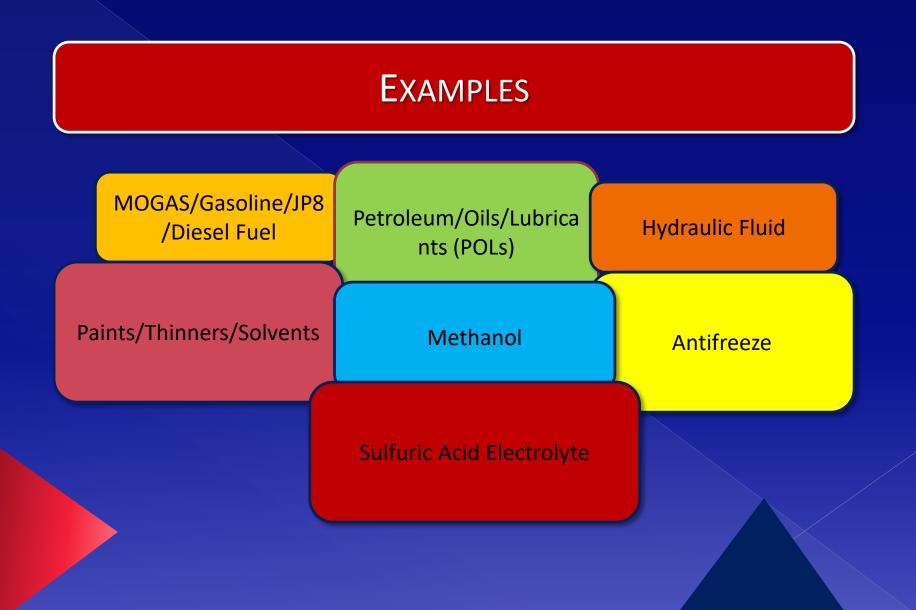
JBLE-I 21-101 Definition:

✓ A serviceable product which requires special management because in a particular form or quantity it has hazardous characteristics (ignitability, corrosivity, reactivity, or toxicity that may pose a risk to human health or the environment

Hazardous Materials

- ✓ Any Chemical which can cause a physical or a health hazard
- ✓ Those chemicals present in the workplace which are capable of causing harm

Examples of HMs



The HazMart – Approval Process



- Unit's Hazardous Material Manager (HMM) submits request using EESOH-MIS to add an item to the AUL
 - Training on EESOH-MIS is Provided by HazMart

- Requests are approved by: (This process takes about 10 days, so plan accordingly)
 - Industrial Hygiene, then;
 - Safety Office, then;
 - CED/CEIE (Environmental)
- Emergency Requests handled on case by case basis
- The item is approved when added to the Unit's Authorized Use List (AUL)
 - The item is authorized for purchase
 - The item is brought to HazMart for issuing of the Bar Code
 - Once the item is Bar Coded, the transaction is completed

HazMat Acquisition Procedures

JBLE-E HAZMART

- ✓ Acquisition: **MUST BE ON AUL FIRST**!!
 - ✓ Any Source on or Off Base
 - ✓ Supply System
 - ✓ AAFES, DECA, Ability One, etc.
 - ✓ Any vendor off Base
 - ✓ Contracts
- ✓ Payment Method:
 - ✓ Cash
 - ✓ Credit Card Government GPC or Civilian
 - ✓ Supply System
 - ✓ Contract
- ✓ Deliveries:
 - ✓ All deliveries should be to the HazMart; B1205, Taylor Road, 878-2781
 - ✓ All HM must be Bar Coded by HazMart Regardless
 - ✓ HazMart will deliver to the Unit
 - ✓ Units must have a Notice of Delegation of Authority Receipt for Supplies, DA Form 1687 on file with the HazMart
- ✓ Items not on the AUL and/or Bar Coded will be removed from the Unit and Placed in Free Issue at the HazMart and considered an illegal purchases. Units may use the proper procedures to add item to the AUL and acquire the item from Free Issue.
- ✓ Illegal purchases are a violation of EPCRA subject to Enforcement Actions. JBLE-E will take all required steps to prevent this non compliance.

Safety Data Sheets (SDSs)

- ✓ Hazardous Materials Manager (HMM)
 - ✓ Obtains SDSs
 - ✓ Organizes
 - Maintains
- ✓ Sources of SDSs:
 - ✓ EESOH-MIS
 - ✓ Manufacturer
 - Websites
 - ✓ Fax or email
 - ✓In person
- ✓Internet Resources
 - √http://www.dlis.dla.mil/hmirs/default.asp
 (registration required)
 - ✓ http://www.hazard.com
 - √http://msds.ogden.disa.mil/index.htm
 - ✓ Google or Other search engines

Note: The HazMart does not issue copies of SDSs!

NOTE

EESOH-MIS is very sensitive to the Manufacture's SDS!

For Example:

A SDS for Black Paint from one manufacture is not the same as from another's, therefore you need 2 items on your AUL in this case.

SDS should not be more than 3 to 5 years old.

Storing HM Containers

Remember:

- Containers not properly Labeled should not be accepted
- Trade name on the Label must match SDS
- Inspects HM sites monthly
- Labels must conform to OSHA as required
 - **DOT** labels
 - **-**HMIS
 - NFPA
- Containers must be Bar Coded with Bar Codes issued by the HazMat







Inventory Control

Remember:

- Know what you have on hand
 - Health
 - Safety
 - Compliance with Federal, State and Local regulations
- Properly labeled and Bar Coded
- Use properly
- Store appropriately
- Inspect sites









Storage Gone Wrong – Inspections???

















What is EPCRA?

EMERGENCY PLANNING AND COMMUNITY RIGHT TO KNOW ACT

Requires JBLE (Eustis) to report storage of large amounts of hazardous materials (fuel, used oil, paint, chlorine) to local fire and safety agencies Requires JBLE (Eustis) to report usage of highly toxic materials to the Environmental Protection Agency (EPA) and the Virginia Department of Environmental Quality (VDEQ)

EPCRA Reporting

EPA MANDATES ANNUAL REPORTING REQUIREMENTS

01 March: Emergency and Hazardous Chemical Inventory

 Tier Two – What is stored on post 01 July: Toxics Release Inventory (TRI)

- What is used on post
- Munitions data

HazMart provides HM data required for EPCRA reporting

Range Control provides munitions data for EPCRA reporting

Air Quality Management (AQM)







Air Quality Source Management

Fort Eustis operates under a state operating permit to construct and operate a military installation in accordance with the provisions of the Virginia Regulations for the Control and Abatement of Air Pollution

Stationary Source Permit to Operate issued 17 December 2010

Permitted Stationary Sources

Stationary Sources

- Abrasive Blasting
- Boilers
- Helicopter Engine Testing and Operation
- Generators
- Landfills
- Paint Booths

Stationary Sources

- Marine Engine Testing and Operation
- Fuel Pumping Station
- Parts Washers
- Storage Tanks
- Woodworking Shop Cyclones

Other Air Quality Sources of Concern

Open burning

Open containers not in immediate use

Asbestos NESHAP

All Permitted Sources Listed Emissions Data Must be Reported Monthly to:

CED/Environmental Element (EE) (757) 878-7373

BY THE 10TH DAY OF THE FOLLOWING MONTH IN WHICH THE DATA WAS COLLECTED

Permitted Source Monitoring

- ✓ The Fort Eustis Virginia Department of Environmental Quality
 Stationary Source Permit has specific source monitoring that
 must be completed and reported monthly!
 - ✓ Emergency generators hourly readings are obtained by CED contactor, MEDDAC staff, or JRRF staff according to activity and should be reported by the 10th of the following month.
 - ✓ Abrasive blasting media must be turned in to the Hazardous Waste Accumulation Facility (HWAF) and the amount in pounds must be totaled monthly and reported.
 - ✓ Paint Booths: Buildings 1411, 27502, 2411, and 3509 must track coating usage. Usage will be entered into the APIMS system out of a daily usage log. Each activity should enter data monthly as a minimum.
 - ✓ Helicopter of marine engine run time must be recorded individually and reported monthly by the activity.
 - ✓ MOGAS and JP8 deliveries to the TMP and Felker Airfield must be reported monthly by the affiliated contractor.

Permitted Source Monitoring (con't)

- ✓ Woodworking cyclones at buildings 27502 and 3509 must record drum or dumpster turn-in amount in pounds
- ✓ Parts washers must have the lids closed when not in immediate use. All parts washer solvent must be preapproved by the Environmental Element (EE).
 - ✓ Used solvent turned in the HWAF will be tracked, recorded by the HWAF and reported to EE.
 - ✓ Dispersal of parts washer solvent to activities by HAZMART will be tracked and reported to EE.
- ✓ Boiler operators of 2701 and 587 will follow all regulatory requirements for proper operation and maintain records of operation and maintenance for review.
- ✓ All activities using refrigerant or ODCs will have properly certified personnel and a system for tracking product purchase and disposal. All state and federal regulations including timely repair and leak rate computations must be recorded.

Storm & Waste Water Management





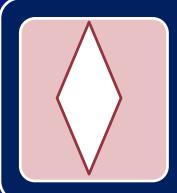


Storm Water

- ✓ Regulated by the Clean Water Act designed to reduce/eliminate polluted storm water runoff
- ✓ Permit allows the installation to discharge storm water from industrial activities into waters of Virginia
 - ✓ Permits
 - ✓ Individual Industrial VPDES and MS4 Phase II (Department of Environmental Quality)
- ✓ No UNAPPROVED discharges to the Storm Drain System.

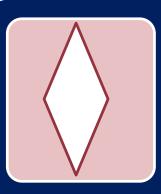
Permits

VPDES (Virginia Pollution Discharge Elimination System)



Industrial Storm water Sector Discharges

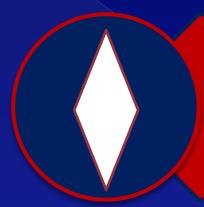
- Motorpools
- Airfield
- 3rd Port



Municipal Separate Storm Sewer System (MS4)Storm Water Management Plan

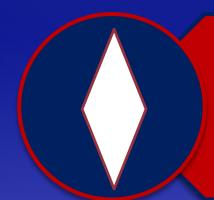
- Minimum Control Measures (MCMs)
- Special Conditions

Requirements



Outfall Sampling

- After discharge or sufficient rainfall
- Analysis
- Evidence of spills, dumping



No UNAPPROVED discharges to the storm drain system

Best Management Practices (BMP)

Ensure each vehicle has a drip pan and that pans are not allowed to overflow

All washing operations must occur at an approved washing facility (2408, 2413, 836, 2702 and 2750)

Ensure all possible sources of contamination are properly stored and have adequate "secondary containment"

Drain protection is important!







Unpermitted Discharges

TYPICAL UNPERMITTED DISCHARGES

Washing operations in locations other than approved washing facilities

Disposal of contaminated water

Processes not indentified in the permits

Fuel transfers/overfill

Criminal Provisions

CLEAN WATER ACTS (CWA) - FELONIES

Knowingly make false statement or representation in any document filed, maintained, or used for compliance to include omission of information.

Knowingly discharge, cause, or permit oil and hazardous substances in to waters, e.g. surface, ground, sanitary, storm, etc.

Wastewater

HRSD INDUSTRIAL WASTEWATER PERMIT

- Bi-monthly sampling requirements
- Regulates any discharges from activities that discharge into the sanitary sewer
- Discharges must be reported

REQUIRES BMPs

- Secondary containment
- Spill kits
- Drain covers
- Good Housekeeping

Oil/Water Separators

- Used to separate a small amount of oil from a larger volume of water
- Degreasers prohibited
- Check storage tank routinely to determine level and pumping requirements
- Don't use as a dumping spot
 - Used oil should be properly disposed

Oil/Water Separators

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- Don't use as a dumping spot
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Solid Waste Management (SWM)















Solid Waste & Recycling Disposition Guide



Helps to Determine the Disposition of Commodity

Educational Tool for Workforce

Ensures Compliance With Local and DOD Guidelines

Improves Sustainability

Special Solid Wastes

Non-Hazardous Waste (NHW)

Used Oil

Asbestos

Compressed Gas Cylinders

Containers of liquids

Rubber tires

Containers-Steel & Plastic Drums

Single Stream Recycling

✓ Fort Eustis uses a single stream recycling system throughout its offices.
All items placed into one toter:

- ✓ Paper of all types (except shredded)
- ✓ Fiber board (cereal boxes)
- ✓ Paper bags
- √ Magazines/catalogs
- ✓ Phone books

- ✓ Newspapers
- ✓ Aluminum cans
- √ Glass bottles
- ✓ Steel/tin cans (small food cans less than
- ✓ Plastic bottles (#s 1 & 2 only)

Please remember!!!

- **✓ Empty containers**
- ✓ Remove tops and drop them in the toters
- ✓ Call 878-7392 or 878-7364

TOTERS WILL BE PICKED UP ON TUESDAYS



Do NOT Place the Following in the Toters!

- ✓ Trash, Garbage, Refuse
- ✓ Wood Products
- ✓ E-Wastes (CDs/DVDs, Magnetic Media, etc.)
- ✓ Fluorescent or Projector bulbs
- ✓ Plastic bags
- ✓ Yard Waste
- ✓ Shredded Paper*
- ✓ Batteries
- ✓ Cardboard Boxes
- Cardboard Boxes





* Shredded paper (DO NOT shred CDs or DVDs with paper) place in clear plastic bag – Pickups will be on <u>Tuesday</u>. Activities must schedule with the SWRC NLT 1200 hrs on Monday (878-2692 or 878-4232)

Household Trash is NOT Allowed in Post Dumpsters!!!



















Municipal Solid (MSW) = Garbage - Rubbish - Trash



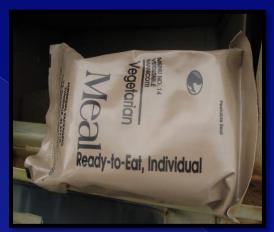


✓ Most of our MSW is sent to steam plants for energy recovery which reduces landfill

Not an Award Winning Recycling Program













This was found in Cardboard Containers











E - Wastes

E-Wastes: General term which includes discarded electronic products and related equipment/products

Electronic Products

Electronic Media Associated Equipment

E-Materials

Disposal of E-products are usually considered hazardous wastes







Electronic Products

- ✓ Components and devices (semiconductors)
- Electronic data processing
- ✓ Office equipment
- Consumer electronics
- ✓ Telecommunication
- ✓ Communication and radar
- ✓ Control and instrumentation
- Medical /industrial instrumentation
- ✓ Automotive electronics



















Contact Your Activity Environmental Coordinator (AEC) for Proper Disposition of E-Wastes



Hazardous Waste Management (HWM)



Introduction





Hazardous Waste Management

Background **Basic Regulations & Regulators Legal Aspects** Some Basic Definitions The Generators-"Generator Status" **Basic Generator Requirements** Waste Identification and Classification

HWM Background

In 1976, Congress passed the Resource Conservation and Recovery Act (RCRA), which directed the U.S. Environmental Protection Agency (EPA) to develop and carry out a program to protect human health and the environment from improper hazardous waste management practices.

The RCRA program is designed to control the management of hazardous waste from its generation to its ultimate disposal from "cradle-to-grave". In this management focus, RCRA is unlike other environmental regulations that focus on abating and/or reducing existing environmental threats. RCRA's intent is to prevent environmental threats.

R

- ✓ RCRA Defines: Solid Wastes & Hazardous Wastes
- ✓ Establishes: HWM System for:
 - ✓ Generators
 - ✓ Transporters
 - √ Treatment, Storage & Disposal Facilities (TSDFs)
- ✓ Authorizes States to run their own HWM programs
 - ✓ States can be more restrictive than the Federal Regs.
- ✓ Requires Pollution Prevention (P2) programs
- ✓ Universal Waste Management
- ✓ Used Oil Management
- ✓ Underground Storage Tanks

Basic Definitions

Hazardous Waste (HW) is simply defined as a <u>Solid Waste</u> that may pose a substantial present or potential hazard to human health or the environment due to it's ignitable, corrosive, reactive or toxic properties

Each Hazardous Waste is assigned a 4 digit alpha numeric code staring with: P, U, F, K, or D

A Solid Waste (SW) is simply defined as any solid, liquid or contained gaseous material which is discarded by being abandoned (thrown away, no longer use, burned or incinerated); Inherently Waste Like (poses a significant risk); certain Military Munitions; Recycle or Reclaimed materials; or Accumulated Speculatively (not expeditiously recycled)

2 Main Subdivisions:

Hazardous or

Non Hazardous SW

Hazardous Determination must be made when a SW is generated!

Before generation — This is preferred when possible — Allows you to Plan Post generation

Basic Definitions

- ✓ Person means an individual, trust, firm, joint stock company, Federal Agency, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, or any interstate body.
- ✓ Generator: Any person, by site, whose act first creates or produces a hazardous waste, used oil, or medical waste, or first brings such materials into RCRA regulation. The Installation is the RCRA Generator! Activities are considered generating Activities. No RCRA permit required
- Transporter Any person engaged in the off-site transportation of hazardous waste, used oil, universal waste, or medical waste. RCRA permit required
- ✓ Treatment, Storage, and Disposal Facilities (TASF): Facilities engaged in the treatment, storage, or disposal of hazardous waste. These facilities are the last link in the cradle-to-grave hazardous waste management system. RCRA permit required

Types of Generators - Generator Status

- Conditionally Exempt Small Quantity Generator (CESQG)
 - ✓ Less than 220 lbs
 - ✓ Less than or equal to 2.2 lbs of acute Hazardous Waste (P-listed)
- Small Quantity Generator (SQG)
 - ✓ Greater than 220 lbs but Less than 2200 lbs per month
 - ✓ Less than or equal to 2.2 lbs of acute Hazardous Waste (P-listed)
- ✓ Large Quantity Generator (LQG) Fort Eustis
 - Greater than 2200 lbs per month (About 4 to 5 Drums)
 - ✓ Greater than 2.2 lbs of acute Hazardous Waste (P-listed)

Large Quantity Generator (LQGs) Basic Requirements - Most Regulated

- Hazardous Waste Determination Generator Status
- Requires EPA ID Number
- Requires Personnel Training
- Maximum Accumulation Time Installation 90 Days
- ✓ Accumulation Sites 2 Types of Sites:
 - ✓ Less than 90-day Sites Temporary Storage Sites (TSS)
 - ✓ Satellite Accumulation Sites SAS
- Container Standards and Labeling
 - ✓ Accumulation Start Date (ASD) Starts 90 Day Clock; Depends on type of site
 - ✓ Must meet organic air emission standards DOT approved containers only!
- Contingency Plans and Emergency Response Updated and Dated Annually
- ✓ Weekly Inspections Within 7 Calendar Days
- Record Keeping At least 3 Years
- Manifesting to TSDF by Transporters
- Waste Identification and Classification

Hazardous Waste Classifications

Characteristic Waste - Generally Results from the use of HazMat-General Term for:

- Hazardous Chemicals as defined by OSHA, or
- Hazardous Substances as defined by the EPA, or
- Hazardous Materials as defined by DOT

Listed Hazardous Wastes (HWs)-On 1 of 4 EPA Lists:



- P Listed-Acutely Toxic
- U Listed
- Sole Active Ingredient of P or U chemical
- Waste from Non-Specific Processes-F Listed
- Waste from Specific Processes-K Listed
- Spill Clean Up of any listed Waste



Hazardous Waste Classifications

✓ Characteristics Wastes

- ✓ Ignitability D001
 - ✓ Liquids with Flash point less that 140°F
 - ✓ Flammable compressed gases by DOT or DOT Oxidizer
- **✓** Corrosivity D002
 - ✓ pH less than or equal to 2 or pH greater than or equal to 12.5
 - ✓ Corrodes steel SAE 1020
- **✓** Reactivity D003
 - ✓ Water reactive, Explodes
 - ✓ Generates cyanide or sulfide gases
 - ✓ DOT forbidden, Class 1.1; 1.2; or 1.3 explosives
- **✓** Toxicity D004 to D043
 - Concentration equal to or greater than the concentration limit
 - Examples-Heavy metals, solvents, pesticides, etc.

Non Hazardous Waste Classification

- ✓ Non Hazardous Wastes (NHWs) This term is not defined by RCRA regulations-Sometimes referred to as Special Solid Wastes.
- ✓ NHWs have been generally accepted in the Hazardous Waste Industry as:
 - ✓ Any wastes generated from Hazardous chemicals, Materials, Substances, etc., which do not meet the definition of RCRA HWs
 - ✓ Many NHWs can be more hazardous than HWs if not properly managed and disposed of.

Key First Step – Waste Identification

- ✓ The HWM process starts with Waste Identification and Classification 2
 Methods:
 - ✓ Sampling and Laboratory Analysis Preferred, however expensive
 - ✓ Knowledge Determination Commonly used, however must be well documented.
- ✓ In order to properly classify a waste, 3 items must be documented:
 - ✓ Identify chemical & physical properties of hazardous materials used
 - ✓ Description on how the waste was generated
 - Description of any non-hazardous materials used
- ✓ Note: the documentation must reflect everything that's in the container of waste, e.g., (1) list chemicals and physical properties (MSDSs or lab analysis); (2) brush and roller painting; & (3) paint cans, rags, rollers, brushes, paint, roller pans, etc.

The Documentation Process

- ✓ List of hazardous materials used: Block 15
 - ✓ Examples: absorbents, rags, oil dry, pans, brushes, cans, etc.
- ✓ Description of the process generating the waste: Block 16-Examples
 - ✓ Turning in no longer needed materials
 - ✓ Turning off-spec or out dated materials
 - ✓ Spill clean-up
 - ✓ Roller or brush painting
 - ✓ Spray painting

THE WASTE DESCRIPTION LOG (WDL) EMP 4.4.6.8 TAB 1 FORM FEVA 32-697 IS USED TO DOCUMENT

EMP 4.4.6.8 Tab 1 VASTE DESCRIPTION LOG (WDL

1. **MACOM/Wing Name (Column C): 2. **Group/Brigade Name (Column E): 3. **Squadron/Battalion Name (Column 4: **Unit Name (Column 1): 5. Name and Grade of HWC: 6. Name and Grade of AEC: 7. Certification and Signature of AEC:		.2 Tab 3 - All Entries Must Be Typed - See WDL (con't) for addi			s Tab Page 1 of:
11. New Waste Stream	12. Update Existing	Waste Stream	13. Site Type:	TSS S	SAS NH:
14. Hazardous Materials Information: (U	se Continuation Sheet if No	reded)			
HazMart Stock Number (NSN or LPN)	Shop Code(s)	MSDS ID Number	MSDS Date	Trade Name or	Item Name
15. List of Non-Hazardous Materials Used	d:				
16. Description of How the Waste was Ge	nerated using the above M	aterials:			
17. Estimated Generation Rate: 18. HWAF USE ONLY: Profi EPA Waste Codes:	Estimated An	nount (Gals or lbs):	UW	r (day, week, month): NHW Date Approved:	

FEVA Form 32-697 15 Jun 13

EMP 4.4.6.8 Tab

The Documentation Process (Con't)

- ✓ List of hazardous materials used: Block 14
 - ✓ Include all MSDSs of products used-must attach copies of all MSDs; & EMP 4.4.6.8 Tab 2 (see side graphic) received from the HazMart when new products are ordered.
 - ✓ Product specifications-attach copies of available; or
 - ✓ Laboratory analysis-attach copies of lab results
 - ✓ Laboratory analysis coordination CED/EE
 - ✓ CED/EE determines when sampling needs to be done
 - ✓ Activities must pay for the sampling-usually by credit card

HAZARDOUS MATERIAL - WASTE EVALUATION REPORT EMP 4.4.6.8 TAB 2

Shop Code:	Location Bldg No:		Shop	Name:			
	Ma	terial Requested					
MSDS ID Number:	.512	iteriai requesico		MSDS D	ate:		
				MSN:			
Manufacturer:			U/I:		Size:		
Manufacturer P/N:			Qty:				
Draw Amount:	Draw Frequency:	Quarterly		Max on Hand:			
	p	hemical & Physical	Datas				
	pH:	nemical & Physical	Flashpe	data			_
Physical State:	pn:		riasnp			-	
	Constitue	nt Waste Disposal	Data:				
CAS Number	Chemical Name	Weight %	Pote	ntial Waste Codes	UHC	Flashpoint	pН
			-				
			-		-		_
			+		-		_
		-	+-		_	-	
			+		_	_	
			_		_	-	
			_				
						\longrightarrow	
		OT Information					
DOT Proper Shipping Nam	DOT UN/NA Nur			PG			
DOT Hazard Class: Emergency Response Guide			Edition:		zard Sub	- class:	

Second Step-Accumulation Site Mgmt.

- ✓ Temporary Storage Sites (TSSs) Must meet all TSS requirements prior to approval
- ✓ Satellite Accumulation Sites (SASs) Must notify CED/EE within 3 days of establishment
- ✓ Non Hazardous Sites (NHSs) Must notify CED/EE within 3 days of establishment
- ✓ Site Approvals (New or Closing) Must Use -EMP 4.4.6.8.2 Tab 1 FEVA Form 32-699 (see side graphic)
 - ✓ Must have: Site Map, Site Specific Contingency Plan, Waste Description Log
 - ✓ FEVA Form 32-699 signed by Commander or Director
 - ✓ Fire Department approval of site location
 - ✓ Safety Office approval of site location
 - ✓ CED AMF EE Grants final approval on all actions
- ✓ CED/EE Notification Inactivation/Reactivation

FEVA FORM 32-699 EMP 4.4.6.8.2 Tab 1

	10	rms Must Be Typ	ed		
Request Date:	2. Type of A	Accumulation Site:	TSS	SAS	N
Type of Approval being req	uested: (Check Only Or	ne)			
		_	_		
Initial Notifi New Accum	cation of New SAS	- ⊢		n of an Existing Site f an existing site	2
4. New Accumi	ulation site		o. Closure of	i an existing site	
7. Temporary Action:	Inactivation	Reactivat	tion Date by	y Activity:	
Generating Activity:		8. Building Nu	mber of Site:		
** Activity Names from EM	IP 4.4.2 Tab 3	9. DODAC:			
 *MACOM/Wing 	Name (Column C):				
 *Group/Brigade 	Name (Column E):				
12. **Squadron/Batta	lion Name (Column G)	0			
13. **Unit Name (Co	lumn I):				
14a. Name and Grade	of HWC:			Telephone:	
14b. Name and Grade	of AEC:			Telephone:	
20. Has there ever be	Date Closed by Activi no wastes are stored or	18. Existing S: ty: will be stored at the	ite Number:	Certified	
19. Certification that20. Has there ever be21. If a spill has ever	Date Closed by Activi no wastes are stored or en a spill at this site? occurred, has the site b Weekly Site Inspection	18. Existing Sty: will be stored at the seen decontaminate " Checklist	ite Number:	Certified Yes	N N
19. Certification that 20. Has there ever be 21. If a spill has ever 22. Copy of the last.*	Date Closed by Activi no wastes are stored or en a spill at this site? occurred, has the site b Weekly Site Inspection	18. Existing Sty: will be stored at the seen decontaminate " Checklist	ne site.	Certified Yes Yes	N N
19. Certification that 20. Has there ever be 21. If a spill has ever 22. Copy of the last * 23. I certify that the above Date:	Date Closed by Activi no wastes are stored or en a spill at this site? occurred, has the site b Weekly Site Inspection	18. Existing S: ty: will be stored at the seen decontaminate " Checklist and accurate.	ne site.	Certified Yes Yes Included	N N
19. Certification that 20. Has there ever be 21. If a spill has ever 22. Copy of the last ** 23. I certify that the above in the second content in the s	Date Closed by Activi no wastes are stored or en a spill at this site? occurred, has the site b Weekly Site Inspection	18. Existing S: ty: will be stored at the seen decontaminate " Checklist and accurate.	tte Number: ne site. sd? S me of Battalion	Certified Yes Yes Included	N N
19. Certification that 20. Has there ever be 21. If a spill has ever 22. Copy of the last * 23. I certify that the above to Date: Telephone: Approvals:	Date Closed by Activi no wastes are stored no a spill at this site? occurred, has the site be Weekly Site Inspection information is complete	18. Existing S: ty: will be stored at the seen decontaminate " Checklist and accurate.	tte Number: ne site. sd? S me of Battalion	Certified Yes Yes Included	N N
19. Certification that 20. Has there ever be 21. If a spill has ever 22. Copy of the last * 23. I certify that the above : Date: Telephone:	Date Closed by Activi no wastes are stored or en a spill at this site? coccurred, has the site b Weekly Site Inspection information is complete	18. Existing S: ty: will be stored at the seen decontaminate or "Checklist and accurate. Na	tte Number: ne site. sd? S me of Battalion	Certifice Yes Yes Included Included Signature Commander or Direct and Rank/Grade:	N N
19. Certification that 20. Has there ever be 21. If a spill has ever 22. Copy of the last * 23. I certify that the above to Date: Telephone: Approvals:	Date Closed by Activi no wastes are stored or en a spill at this site? coccurred, has the site b Weekly Site Inspection information is complete	18. Existing S: ty: will be stored at the seen decontaminate " Checklist and accurate.	tte Number: ne site. sd? S me of Battalion	Certified Yes Yes Included	N N
19. Certification that 20. Has there ever be 21. If a spill has ever 22. Copy of the last * 23. I certify that the above: Date: Telephone: Approvals: 24. Post Safety Office	Date Closed by Activi no wastes are stored or en a spill at this site? coccurred, has the site b Weekly Site Inspection information is complete	18. Existing S: ty: will be stored at the seen decontaminate or "Checklist and accurate. Na	tte Number: ne site. sd? S me of Battalion	Certifice Yes Yes Included Included Signature Commander or Direct and Rank/Grade:	N N
19. Certification that 20. Has there ever be 21. If a spill has ever 22. Copy of the last * 23. I certify that the above to Date: Telephone: Approvals:	Date Closed by Activi no wastes are stored or en a spill at this site? coccurred, has the site b Weekly Site Inspection information is complete	18. Existing S: ty: will be stored at the seen decontaminate or "Checklist and accurate. Na	tte Number: ne site. sd? S me of Battalion	Certifice Yes Yes Included Included Signature Commander or Direct and Rank/Grade:	N N
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19. Certification that 20. Has there ever be 21. If a spill has ever 22. Copy of the last * 23. I certify that the above i Date: Telephone: Approvals: 24. Post Safety Office 25. Post Fire Departn CED/EE Approval:	Date Closed by Activi no wastes are stored or no a spill at this site? occurred, has the site be Weekly Site Inspection information is complete : Na nent: Na	18. Existing S: ty: will be stored at the seen decontaminate and accurate. Na when and Title: me and Title:	ite Number: ne site. S me of Battalion. Title ar	Certifice Yes Yes Included Included Signature Commander or Dire Date Date	N N
19. Certification that 20. Has there ever be 21. If a spill has ever 22. Copy of the last * 23. I certify that the above : Date: Telephone: Approvals: 24. Post Safety Office 25. Post Fire Departn CED/EE Approval: 26. Date of Final Approval	Date Closed by Activi no wastes are stored or no a spill at this site? occurred, has the site be Weekly Site Inspection information is complete : Na nent: Na	18. Existing S: ty: will be stored at the seen decontaminate ' Checklist and accurate. Na when and Title:	ite Number: ne site. S me of Battalion Title ar	Certifice Yes Yes Included Signature Commander or Dire and Rank/Grade: Date Date	N N
19. Certification that 20. Has there ever be 21. If a spill has ever 22. Copy of the last * 23. I certify that the above i Date: Telephone: Approvals: 24. Post Safety Office 25. Post Fire Departn CED/EE Approval:	Date Closed by Activi no wastes are stored or no a spill at this site? occurred, has the site be Weekly Site Inspection information is complete : Na nent: Na	18. Existing S: ty: will be stored at the seen decontaminate ' Checklist and accurate. Na when and Title:	ite Number: ne site. S me of Battalion. Title ar	Certifice Yes Yes Included Signature Commander or Dire and Rank/Grade: Date Date	N N

FEVA Form 32-699 30 Oct 12

EMP 4.4.6.8.2 Tab 1

TSS, SAS, NHS Common Items

- Signs
 - **HW or NHW Site**
 - ✓ Type of Accumulation Site
 - No Smoking
 - Unauthorized personnel Keep Out
- **Emergency Response Information**
 - Container Contents Logs (CCL) (each container)
- **Inspected Weekly**
 - ✓ EMP 4.4.6.8.2 Tab 2 Form
 - DO NOT store serviceable materials with wastes
 - ✓ NHWs will be kept in TSSs or SASs or NHSs
- Containment
- **Protection from the Elements**
 - ✓ Security
- Communications Equipment
- Fire Extinguisher
 - ✓ Two 10lb ABC or One 20lb ABC
- Spill Kit & Decontamination Equipment
 - Containers on pallets

EACH SITE MUST HAVE A COMPATIBILITY CHART





Acquisition of Containers and Labels

- ✓ HWAF will provide the following to Activities:
 - ✓ Containers for wastes and spill use
 - ✓ Header CCLs
- ✓ TSSs, SASs must be approved to used this service
- ✓ Activities will reimburse CED/EE
 - ✓ Container Contents Logs (CCL) (each container)

FEVA FORM 32-690 EMP 4.4.6.8.1 Tab 3

Activ	ity:									Page 1 of:	
DODA	AC:										
Activi	ty Environmental Coo	rdinator (Al	EC):							AEC Signatur	
AEC Phone Number:			Authorized Site Number:			Date:					
				D	escription	of Reimbu	rsable Iten				
Date	Description 1348 Doc No. Manifest No.	HWAF Overhead Fees	(DRMO) Charges	Sampling Charges	Size & Type	Container Charges	Antifreeze Charges	Off-spec Fuel Charges	Oily Rags/Abs Charges	Other Charges Specify	Total Line Cost
\Box											
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-											
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\neg											
	Page 1 TOTALS:										
	Issued By HWAF:								I	age 2 Total: =	

FEVA Form 32-690

EMP 4.4.6.8.1 Tab 3

HW & NHW Containers

- Only DOT approved containers will be used
- ✓ HW will have appropriate DOT labels
- ✓ NHW may require DOT label
- Container number on label will match the CCL
- Containers of ignitable or reactive wastes will be located at least 50 feet from installation's property line

DOT Approved Labels





Accumulation Site Management (Con't)

Temporary Storage Site (TSSs)

Satellite Accumulation Sites (SASs)

Non Hazardous Sites (NHSs)

TSS - Temporary Storage Sites

- ✓ Located at distance from generation point
- ✓ Receive wastes from multiple sites
- ✓ Any quantity of wastes
- ✓ Accumulation Start Date (ASD)-First drop in container
- ✓ Must be turned-in-to HWAF within 14 days
- ✓ Site Specific Contingency Plan Part of Installation Plan



SAS – Satellite Accumulation

- Waste from, at, or near the point of generation
- ✓ Under control of operator generating waste
- ✓ Only one generator
- Quantity Limitation
 - ✓ One quart of P-Listed Waste
 - ✓ 55 gallons of HW
- ✓ ASD
 - ✓ When quantity limit is reached
 - ✓ Container is full & ready for turn-in
 - ✓ Container has been accumulating wastes fro 1 year
- ✓ Must be turned-in within 3 days to:
 - ✓ TSS
 - ✓ HWAF



NHS – Non – Hazardous Site

- ✓ NO HAZARDOUS WASTES
- ✓ Located at distance from point of generation
- ✓ Receive wastes from multiple sites
- ✓ Any quantity of wastes
 - ✓ Non Hazardous Wastes (NHWs)
 - ✓ Universal Wastes (UWs)
 - ✓ USE Oil Containers
 - ✓ Recyclables
- ✓ Site Specific Contingency Plan Part of Installation Plan



Third and Final Step - Transportation & Disposal

Transportation of HWs & UWs EMP 4.4.6.8

Off Post Transportation
ONLY BY LICENSED
TRANSPORTERS

No HWs or UWs may be brought on Post from any Off-Post site
No HWs or UWs may be taken Off Post, except by licensed transporters
No HWs or UWs from re-deployments



HWAF Operations – EMP 4.4.6.8.1

- Pickup & Delivery of Containers & Wastes Must be Scheduled or Coordinated 3 Days in Advance!!!!
- ✓ Hours of Operation: Monday through Friday, 0800 to 1500 hrs, except federal holidays
- ✓ Location: Office Bldg 1207; HWAF Bldg 1208
- Telephone: 878-3915; 878-3384 fax
- ✓ Turn-in Documents Must be Completed at Time of Scheduling Appointments!!!!

HWAF Turn-Ins

Wastes must have Waste Description Log prior to turn-in Sites must be approved or have memorandum from Commander or Director appointing AEC Turn-in Documents:

DD Form 1348-1A signed by AEC or HWC

Container Contents Log (CCL): Must be Signed by AEC!!!

Pickups scheduled by AEC or HWC

AEC or HWC must be available at pickup site

Containers will be inspected by HWAF personnel at pickup Activity will have personnel available for opening and closing

containers at the pickup site

Activity will have personnel available for loading containers at the pickup site

Site evaluations will be accomplished at pickup

Activities will reimburse the installation for HWAF operations

Forms – Containers Contents Log (CCL)

Container No :	E101006	2. Pro	file No :0011		3. HWAF Doc. Reg. N	lo: /20:	59202/3
Generating Activity:	7 Gp HHC		3rd Port	4	5. Building No :	438	TSS
Authorized Site No :	ET99002 DO	DAAC: W26AKG	7. Phor		umber of HWC	SSG Coope	r 878-3898
DOT Proper SHipping	Name : Waste Paint			APPLICATION OF THE PROPERTY OF			
DOT Hazard Class :	3	10. DC		1263	11. Packaging Group 55	: _II	RQ: 100 lbs
2. DOT Container Type	1A2		13. 8	Size or Volume :	35		
PA REQUIRED INFO	14	. Waste Description : Paint, Ign	itable no metals	s			
5. ASD:	SCL & 1 16	. EPA Waste Codes : D001					
		Source Code : A21					
7. Origin Code:1	10	. Source code . AZI		19. F0	rm Code : B209	-	
0. Date of Activity	21. Type of Waste (Description of		22. Process G	Senerating Waste	23. Name of Person Adding Waste	24. Pour	rimated Quantity nds 25. Gallon:
17 14-61	WASTE PAIN	Т	EXPIRED	DI .	PFC BOWENS		40
20 July 01	WASTE PAIN	7	Expired		SSG LAXAran		C
			(1		/		
		2					
6. Comments :					27. Subtotal of Additional	Sheets	
o. comments .					28. Containe		
					29. ACTUAL WEIGHT BY	HWAF:	234 (65,
	ts of this container have been	fully and accurately described abo	ove and listed IAW		state, and local rules and regu		e: 20 Jul 01
certify that the content			THE R. LEWIS CO., LANSING MICH. LANSING MICH.	ature:			

Forms – Issue Release Receipt-1348-1A

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Forms – Container Turn-In Log

EMP 4.4.6.8.1 Tab 4 Container Turn-in Log FEVA Form 32-696

All Containers turnedin to the HWAF must be recorded on the Activities CTL

CONTAINER TURN-IN LOG

enerating Activity:				Building Number:					
Date of	Container Number	ASD for HWs or UWs	Common Name or Description	Quantity		Cost			Name of Person
Turn-in				Pounds	Gallons	HW	UW	NHW	Turning-in Waste
		_							
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FEVA Form 32-696 30 Oct 12

EMP 4.4.6.8.1 Tab 4

Universal Waste



Universal Waste

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

THE FOLLOWING MATERIALS ARE REGULATED AS A UNIVERSAL WASTE IN ACCORDANCE WITH 40 CFR PART 273.





___UW-BATTERIES
__UW-MERCURY
CONTAINING EQUIPMENT

__UW-LAMPS
PESTICIDES



Date:____

Cont. No:



D.O.T. PROPER SHIPPING NAME AND UN OR NA NO.
WITH PREFIX (REQUIRED DURING TRANSPORT, WHEN
MATERIAL IS ALSO REGULATED BY 49CRF PARTS 172-180)

HANDLE WITH CARE!

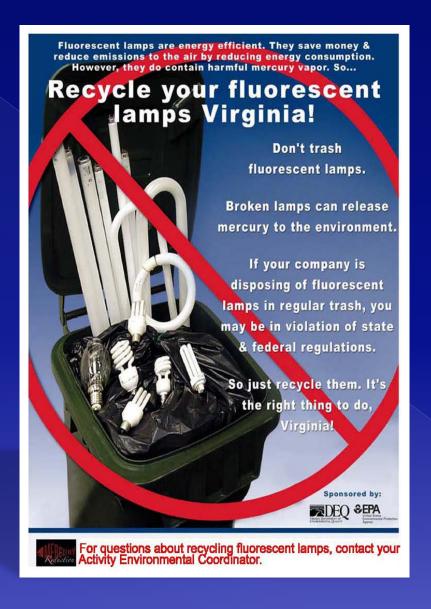
GENERATOR INFORMATION: Joint Base Langley-Eustis (JBLE) 733d Mission Support Group (MSG) Civil Engineer Division (CED) 1407 Washington Blvd. Fort Eustis, VA 23604-5332 EPA ID. NO: VA8213720321 757-878-3915



Universal Waste con't

- ✓ Universal Waste A limited number of wastes that would otherwise have to be managed as HWs, e.g., batteries, lamps, pesticides, mercury containing thermostats
- ✓ Sites Do Not need to be approved
- ✓ UWs will be stored in TSS, SAS or NHS where practical
- ✓ Will be inspected monthly
- ✓ UW labels will have the type UW marked
- ✓ ASD will be marked on label
- ✓ UWs excluding UW Lamps will be turned-in within 270 days of ISSUE
- ✓ UW Lamps will be turned-in within 60 days; Full containers within 10 days of ASD
- ✓ Broken UW Lamps will handled as UWs
- ✓ UWs with liquids will have containment & Spill kits

Universal Waste con't



Used Oil Containers and Tanks

- Used oil tanks will be labeled "USED OIL"
- Containers of used oil will be labeled "USED OIL"
- Containers of used oil will not be stored in TSSs or SASs; May be stored in NHS
- Containers and tanks of Used Oil should be secured or locked to prevent contamination

USED OIL

GENERATOR INFORMATION: Joint Base Langley-Eustis (JBLE) 733d Mission Support Group (MSG) Civil Engineer Division (CED) 1407 Washington Blvd. Fort Eustis, VA 23604 – 5332 EPA ID. NO: VA8213720321 757-878-3915

33d Mission Support Group (MS Civil Engineer Division (CED) 1407 Washington Blv d. Fort Eustis, VA 23604 – 5332 EPA ID, NO: VA8213720321 757-878-3915

Abandoned Containers

This Is a Significant Out of Compliance for the Installation

Immediately Report Abandoned containers to the MPs

> Failure To Do So – You Just Became the Owner

Safely - Try to Identify Contents From Labels, Markings Try to Identify Owner Containers of Unknown Contents

Remember Safety First – Contents May Not be What's on the Label

Label as "Awaiting Analysis"

Coordinate with the HWAF for assistance

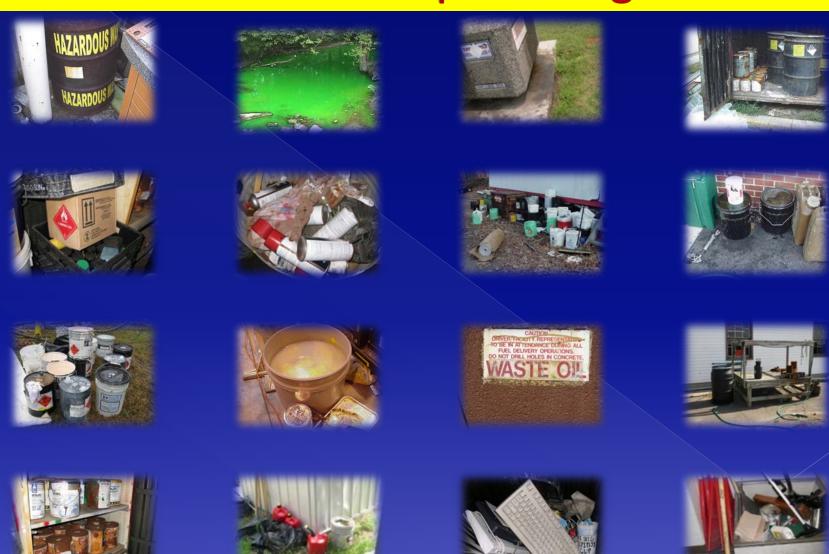








Perform Routine Inspections So Your Sites Does Not End Up Looking This



Spills, Contingency Plans (CP) & Emergency Response







Objectives

- **✓ Define Spill**
- √Why Spills Happen

- ✓ Reasons for Spill Response
- √ How to
 Prevent Spills

- ✓ Spill Response Procedures
- **✓** Penalties

What is a Spill?

✓ Leakage, seepage, or other release



√The unintentional or intentional spilling, leaking, pumping, pouring, emptying, or dumping of hazardous waste, material or petroleum product into or on any land, water or air





How do Spills Occur?

Refueling

Vehicle and vessel maintenance/movement

HazMat storage/handling/transporting

Auto accidents

Equipment malfunctions/breakage

Human error

What Can I Do To Prevent Spills?

Provide secondary containment

Use funnels when filling

Keep clear of water sources/drains

Use drip pans

Use proper materials

Follow written SOPs



Why Respond?

May Affect:

- Human health and/or life
- Wildlife (on land and in the water)
- Environment (i.e. drinking water)

Aesthetics

Mandated by Federal and State Regulations

- Oil Pollution Act of 1990 (OPA '90)
- Federal Water Pollution Control Act (Clean Water Act)
- Superfund amendments & Reauthorization Act (SARA)
- Resource Conservation & Recovery Act (RCRA)

If I don't Respond???

What are the Consequences of a Spill?

- ✓ Notice of Violation (NOV)
- ✓ Costs
 - ✓ Financial
 - ✓ Cleanup
 - ✓ Disposal
 - ✓ Remediation
- ✓ Legal Consequences
 - ✓ Fines:
 - √ \$250,000 per individual
 - √ \$500,000 per organization
 - ✓ Jail: Up to 15 years in prison.



Responsible parties at onshore facilities and deepwater ports are liable for up to \$350 million per spill

- ✓ Protect Yourself
 - ✓ Utilize Proper PPE
 - ✓ Proper ID of released material
- ✓ Stop the Flow
 - ✓ If **SAFE** to do so!
- ✓ Contain The Spill
 - ✓ Different Adsorbents for different spills (oil-only, universal & acid/bases)
- ✓ Call the Fire Department
 - ✓ 878-1008 or 911

- ALL spills must be reported to Fire and Emergency Services!
 - ✓ For Emergencies, Large Spills or any release into water or storm drains, dial:
 - **√**911
 - For small spills, controlled situations or if calling from a mobile phone, dial:
 - √ 878-1008 JBLE Eustis

Includes:

- All hazardous materials
- Chemicals
- Petroleum, Oil & Lubricants (POLs)
- ANY quantity
 released into any
 body of water, storm
 drains

FIVE LEVELS OF HAZWOPER TRAINING

First Responders - Awareness (Level 1)

Witness or discovers, and reports the release or spill, and Assist Emergency Personnel as requested

First Responders - Operational (Level 2)

Protects nearby persons, property, or the environment from the effects of the release/spill

Hazardous Materials Technicians (Level 3)

Stops the release at its source

Hazardous Materials Specialists (Level 4)

Supervise and supports the HM Technicians

Incident Commander (Level 5)

Assumes control of the incident



TRAINED INDIVIDUALS SHOULD:

- ✓ Understand the Role of the First Responder
- ✓ Understand What HMs & Wastes Are
- ✓ Understand Potential Risks and Outcomes Associated with a Release of HMs & Wastes
- ✓ Recognize the Presence and Identify the HM or Waste in an Emergency
- ✓ Have the Ability to Recognize the Need for Additional Resources

Recent Spills

- Fort Eustis Spill Response Personnel have responded to over 22 Spills during calendar year 2013 4 Have been reportable to Regulatory Agencies (I.E. VDEQ and the NRC)
- ✓ 09-07-2013— Raw sewage overflow from clogged sewer line. Line was clogged with grease, and paper towels and trash from barracks buildings Barracks 1001,2,3 and 1004 (200 Gallons)
- ✓ 05-48-2013 Improper discharge of paint clean up materials to storm drain. Not reported, discovered by FES 3 days later. −128th Aviation BDE (2 Gallons)
- ✓ 05-01-2013 oily bilge water-Skiffes Creek-US Navy operations (.01 Gallons)
- ✓ **04-22-2013 Leaking engine manifold** 3rd Port (.5 Gallons)

New Regulations!!!

- ✓ Site Specific Contingency Plans
 - Must contain certain information
 - ✓ Emergency Response Numbers
 - Verbal Notification for Evacuation
 - ✓ Site Specific Assembly Points
 - ✓ Location of Emergency Equipment
 - Eyewash
 - ✓ Fire Extinguishers
 - ✓ Spill Kits
 - ✓ PPF
 - Reviewed, Dated and Signed Annually
 - ✓ No "penciling in" of review dates
 - ✓ Posted at the Site

EMP 4.4.7 Tab 1 30 Oct 12

JBLE - EUSTIS

NAME of YOUR FACILITY

DATE

HAZARDOUS MATERIALS & WASTE CONTINGENCY PLAN

- 1. Scope: The primary purpose of this contingency plan is to minimize hazard to human health and the environment from fires, explosions, unplanned sudden and non-sudden releases of hazardous waste to the air, soil or surface waters. The scope of this plan is limited to hazardous materials & waste spills and emergencies at or adjacent to the [Name of Your Facility]
- 2. Location: The [Name of Your Facility] is located at Building [Bxxx] [Physical Address] [Installation], Virginia.

3. Emergency Procedures:

- a. Notifications: SIGNS ARE POSTED WITH EMERGENCY RESPONSE NUMBERS.
- Any person discovering any potential emergency situations at the facility should notify the Military Police or Fire and Emergency Services for assistance.
- (2) The Activity Environmental Coordinator (AEC), Hazardous Waste Coordinator (HWC), Site Supervisor, or trained personnel are present at all times while the facility is conducting routine operations. The Supervisor will notify Fire and Emergency Services when required.
- (3). The AEC, HWC, or Site Supervisor shall keep all unauthorized personnel out of the area while awaiting the arrival of the emergency response team or evacuate - see below.
- b. Fire and Emergency Services must be notified immediately at **911** (or 878-1008 if calling by cell phone) if any of the following situations occur:
 - (1) Fire involving Hazardous Materials (HMs), Hazardous Waste (HWs), Universal Waste (UWs), or Non-Hazardous Waste (NHWs).
- (2) Explosion involving HMs HWs, UWs, or NHWs.

Did You Know?

- ✓ In The United States there are more than 70 spills reported on an average day.
- ✓ Did you know that the used oil from one oil change can contaminate 1 million gallons of fresh water a years' supply for 50 people!
- ✓ In Many States, "Backyard Mechanics" dump more used oil into environment each year than the Exxon Valdez spilled into Alaska's Prince William Sound.

Tank Management







Aboveground Storage Tanks (ASTs) & Underground Storage Tanks (USTs)



What are ASTs?

EMP 4.4.6.14.1 Aboveground Storage Tanks (AST)

- ✓ (VDEQ) 9 VAC 25-91-10 et seq.: Facility and Aboveground Storage Tank Regulation
- ✓ (EPA) 40 CFR 112: SPCC Regulation
- ✓ Any one or combination of tanks, including pipes used to contain an accumulation of oil at atmospheric pressure, and the volume of which including the volume of the pipes is more than 90% above the surface of the ground.







Regulated ASTs

If a Facilities total storage capacity of Above Ground Storage Tanks is greater than 25,000 gallons then any AST with a capacity of 660 gallons or more becomes a regulated tank.

regulated tank.



JBLE-Eustis has a storage capacity greater than 125,000 gallons with 9 regulated tanks greater than 660 gallons

Daily Regulated AST Inspections



A complete walk through of the facility property in the areas where the AST is staged to ensure that no hazardous conditions exist



An inspection of the ground surface for signs of leakage, spillage, or stained or discolored soils



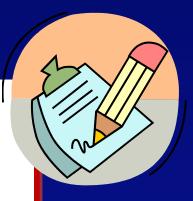
A check of the berm or dike area for excessive accumulation of water and to ensure the dike or berm manual drain valves are secured

- ✓ A visual inspection of the exterior tank shell to look for signs of leakage or damage
- ✓ An evaluation of the condition of the aboveground storage tank and appurtenances

Weekly Regulated AST Inspections

Checklist

- √ Containment dike/berm free of cracks
- √ Containment area free of standing water or oil
- √ Gate valves, fill valves secured and in good condition
- ✓ Containment area/base of tank free of high grass, weeds, dirt, and debris
- √ Tank free of rust and other deterioration.
- √ Ground surface and fuel transfer areas free of signs of leaks
- √ Leak detection equipment operational and in satisfactory condition
- √ OWS or drainage tank in satisfactory condition
- √ Tank water bottom draw offs not in use are secured.
- √ Valves inspected for signs of leakage or deterioration.
- √ All tank gauges are operational



Less-Regulated Tank Items of Concern

- ✓ Monthly Inspections!!
- ✓ Any signs of unexplained dead or withered vegetation in area?
- ✓ Ground surface is free of signs of leakage, spillage or stained or discolored soil?
- ✓ Is fill gauge functioning and operating properly?
- ✓ Is fill cap properly secure?
- ✓ Is vent pipe clear?
- ✓ Is the tank labeled indicating its contents and has legible warning labels?
- ✓ Is all piping secure and free of damage and/or wear?

What are USTs?

EMP 4.4.6.14.2 Underground Storage Tanks (UST)

- ✓ VDEQ Regulation: 9 VAC 25-580, Underground Storage Tanks, Technical Standards and Corrective Action Requirements
- ✓ EPA Regulation: 40 CFR Part 280
 - An underground storage tank system (UST) is a tank and any underground piping connected to the tank that has at least 10 percent of its combined volume underground



Regulated USTs

- ✓ Capacity greater than 110 gallons
- ✓ Does not include heating oil

POCS HOUTHURING HEARING OIL



AAFES UST Upgrades

JBLE - Eustis has 10 regulated USTs

Monthly Inspections

The monthly inspection should include the following

Complete walk through of the facility property in the area where the UST is staged to ensure that no hazardous condition exist

Inspection of the ground surface for signs of leakage, spillage, or stained or discolored soils

Check of the spill containment manhole (catchment basin) for excessive accumulation of water

Visual inspection of the fill pepe and surrounding areas to look for signs of leakage or damage

Evaluation of the condition of the UST

Non-Regulated Don't Exist!

Tanks

 All tanks are regulated in one way, shape or form! **Tanks**

 Help identify spills from overfills, damaged siphon lines, etc... **Tanks**

• SPILLS MUST BE REPORTED LIKE ANY OTHER SPILL!



Environmental Impact Assessments & Natural Resources

Environmental Impact Assessments







Environmental Impact Assessments

- ✓ National Environmental Policy Act (NEPA): Enacted from recognition of impact of federal government actions & use of federal resources on all components of human/natural environment.
- ✓ Federal government includes military operations.
- ✓ Evaluate impact of a "project/action" or use of federal resources on the human/natural environment.
- ✓ Prepare AF IMT 813 form and attach to one of the 4 documents below
- ✓ Prepare appropriate level of documentation:
 - = Environmental Impact Statement (EIS).
 - = Environmental Assessment (EA).
 - Record of Environmental Consideration (REC)
 (based on Categorical Exclusion or "CX"), or
 - = Environmental Impact Analysis (if no CX but does not require an EA).

EIS (significant)

EA (not sure if significant impact)

REC or EIA (no significant impact)

- ✓ Environmental impact assessments begin with the proponent
 - ✓ Coordinate with the Environmental Element-CED
 - ✓ Proponents is responsible for preparing a draft REC or EIA
- ✓ "Significant" impact is often a subjective term
- ✓ The location, time frame, duration and scope of the action can affect the type of documentation and the outcome
- ✓ Documentation is paramount
- Preparation of a REC/EIA can be completed in a matter of days if all information has been obtained
- ✓ A good rule of thumb is 6 months to complete an EA
- ✓ An EA will result in either a FONSI or a Notice of Intent to prepare an EIS
- ✓ An EIS may take a year or more to complete
- ✓ Environmental impact assessments should be considered as planning tools

✓ EIS:

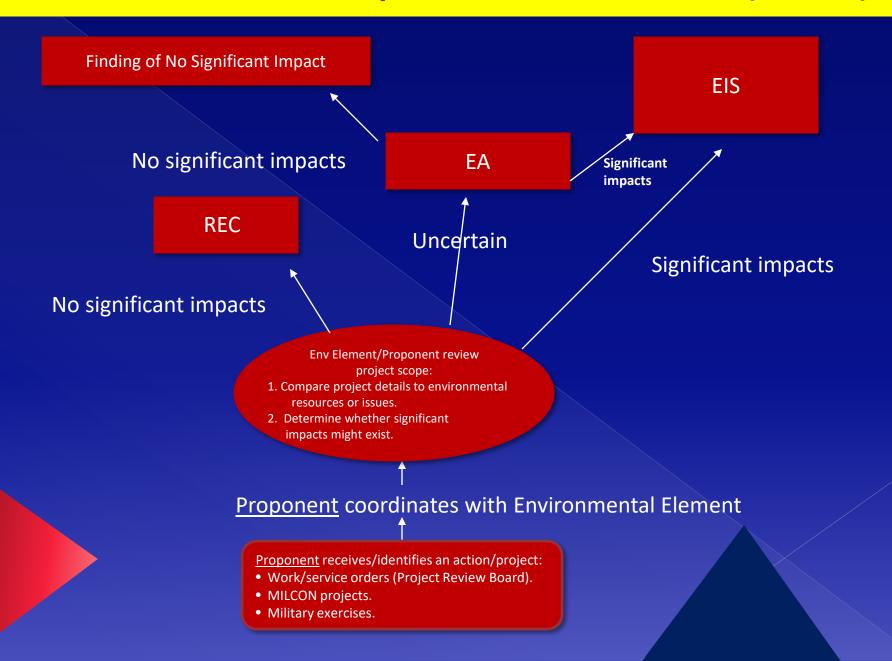
- Closure of a military installation under BRAC
- Conversion of 200 acres of forested wetlands to build a reservoir

EAs:

- Clearing of wetlands and forested land to accommodate a clear zone for aircraft safety at an airfield
- Dredging of sediment to retain a functional port facility
- ✓ Aerial spraying against mosquito disease vectors using military aircraft
- Realignment of Fort Eustis under BRAC 2005
- Clearing of 50 acres of forested land that does not contain federally listed or rare species
- Regional or installation-wide military exercise involving field operations.

REC/EIAs:

- Asbestos disturbance in a building being renovated
- Battalion-size tactical communication exercise
- Navy Operational Entomology course
- Construction/expansion of a parking area
- Addition to an existing building.



EVALUATE POTENTIAL IMPACTS BY COMPARING PROJECT TASKS TO ENVIRONMENTAL RESOURCES OR ISSUES.

Environmental Resources/Issues:

- ✓ Asbestos-containing materials and lead-based paint removal/abatement/disturbance
- ✓ Natural resources (wildlife, fisheries, soils, habitat [wetland, dunes, shoreline, sub-aqueous lands, streams, forested areas, surface waters])

✓ Water quality and permitting

✓ Coastal zone management

✓ Sedimentation & erosion

✓ Endangered/threatened species

✓ Soil/sediment deposition & disposal

✓ Soil/sediment deposition & disposal

- √ Radiation (ionizing & non-ionizing radioactive sources)
- √ Historical/cultural/archeological resources
- ✓ Air quality
- ✓ Noise
- ✓IRP sites
- **✓** UST/ASTs
- ✓Infrastructure
- ✓ Aesthetics
- ✓ Solid waste
- ✓ Land sustainability
- √ Hazardous materials & waste
- √ Environmental justice

Project tasks:

Excavation/Digging

Deposition of soil or other material.

Equipment operation & maintenance.

Fueling operations.

Live fire/munitions use.

Type & number of vehicles used.

Off-road vehicular movement.

Painting/paint removal.

Construction.

Demolition of structures/buildings.

Renovation of structures/buildings.

Tree/Vegetation removal.

Aircraft operations.

Need for pest control.

What else????

Quick definitions of the 4 types of impact assessments:

- ✓ Environmental Impact Analysis (EIA): Proposed action is exempt or assessed as environmentally insignificant and not requiring further analysis.
- ✓ Record of Environmental Consideration (REC): Proposed action is categorically excluded from further analysis (based on the AF's list of categorically exclusions). Format/content is virtually the same as an EIA.
- ✓ Environmental Assessment (EA): Proposed action has potential adverse environmental impacts and additional evaluation is needed to determine whether significant impact will occur (for example, a CX cannot be justified or there is uncertainty). Results in either a Finding of No Significant Impact (FONSI) or recommendation to prepare a more detailed Environmental Impact Statement. Usually completed as a contract coordinated with the Environmental Element.
- ✓ Environmental Impact Statement (EIS): Required for a major Federal action with significant environmental effects. Includes irreparable damage and lost resources & mitigation efforts. Usually completed as a contract coordinated with the Environmental Element.

Natural Resources (NR) Management

- ✓ Natural resources include game & non-game wildlife, forestry products, land and habitats
- ✓ Habitats include wetlands, commercial forests, urban forests, shorelines/riparian corridors, open fields/early successional habitats, lakes/ponds and streams
- ✓ These resources are managed/conserved in a manner to meet military missions
- ✓ Integrated Natural Resources Management Plan (INRMP)
 - ✓ Required by the Sikes Act
 - ✓ Is the installation's policy & procedures document for NR management
 - ✓ Required by virtually all military installations
 - ✓ Covers 5-year period but reviewed annually
 - ✓ Fort Eustis INRMP was revised for 2013-2018
 - ✓ Prepared by Environmental Element staff and based on mission requirements
 - ✓ Requires concurrence and signature by US Fish and Wildlife Service and Virginia Department of Game and Inland Fisheries
 - ✓ Approved by the 633 Air Base Wing Commander
 - ✓ Accessible from the Environmental Element webpage

Wildlife

✓ Wildlife documented on Fort Eustis to date:

✓ Mammals: 27

✓ Birds: 173

✓ Reptiles: 23

Amphibians: 14

✓ Fish: 35



Native bird species:

- Protected under the Migratory Bird Treaty Act (MBTA).
- ✓ Do NOT capture, kill or harass any bird species nor remove or collect nests, feathers, bird parts or eggs

Federally Endangered or Threatened Species:

- Protected under the Endangered Species Act
- ✓ None documented on Fort Eustis property
- ✓ Atlantic sturgeon listed as endangered in Feb 2012 and exists in James and possibly Warwick Rivers.

Wildlife

✓ Bald eagles:

- ✓ Were removed from the List of Federally Endangered and Threatened Species in 2007.
- ✓ Protected under Bald & Golden Eagle Protection Act and
- ✓ MBTA
- ✓ Seven active nests to date on Fort Eustis.



- ✓ Do NOT capture, kill, harass, collect, remove or relocate ANY wildlife species (excluding authorized hunting, fishing and trapping)
- ✓ Do NOT release non-native species onto Fort Eustis
- ✓ Many wildlife diseases exist on post that can be transmitted to people including rabies and tick-borne diseases
- ✓ No venomous snakes have been documented on Fort Eustis to date
- ✓ Nuisance and non-native wildlife issues must be addressed directly to the Environmental Element or through the Civil Engineer Division Help Desk (878-HELP)
- ✓ Other wildlife questions can also be addressed to the Environmental Element natural resources staff for assistance
- ✓ Fishing is prohibited from Browns Lake
- ✓ Fishing in Eustis Lake is a "catch and release" only



Wetland & Adjacent Habitats

- ✓ Fort Eustis contains approximately 3,000 acres of wetlands
- ✓ Includes tidal, non-tidal and ephemeral pools
- ✓ Constitute important habitats that:
 - ✓ Function as natural flood control systems
 - ✓ Function as contaminate filtering systems
 - ✓ Contribute to biodiversity and ecosystem productivity
 - ✓ Serve as part of the training area landscape
- ✓ Regulated by the Clean Water Act

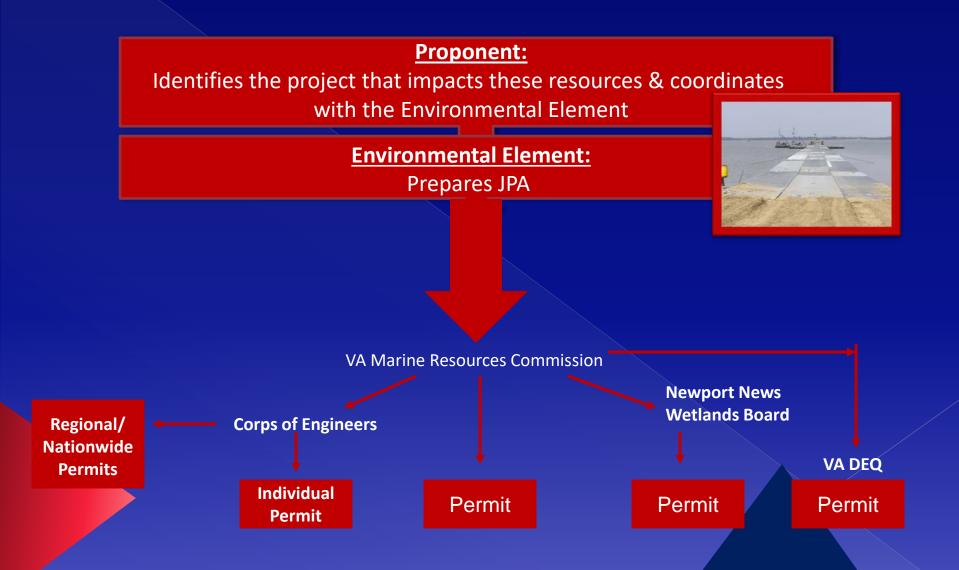


Unpermitted wetland damage from widening an existing trail (considered fill material).

Wetland & Adjacent Habitats (con't)

- ✓ Federal, State and local jurisdictions exist.
- ✓ Loss of, placement of fill material into or other impacts to wetlands or surface waters require permits from respective jurisdictional authorities.
- ✓ Permitting process accomplished via preparation/submission of a Joint Permit Application. Processing may take 3-6 months.
- ✓ The installation goal is to protect a 100-foot upland, vegetated buffer around wetlands to the extent practical (referred to as a Resource Protection Area under the Chesapeake Bay Preservation Act).

Wetlands/Surface Waters Permitting-Joint Permit Application (JPA) Process



Forestry Products and Forest Habitats

- ✓ 2,700 acres of commercial forested land valued at \$4.2 million.
- Primarily mixed hardwood-pine.
- Considered real property; timber must be assessed & offered for sale as opposed to disposal.
- ✓ Proceeds go into the 57F3875.0003 Air Force forestry account.
- ✓ Down/non-standing timber and kindling can be obtained but a firewood permit is required & may be subject to quarantines.
- ✓ Mulch availability is variable & may be
- ✓ subject quarantines.
- ✓ Contact the Environmental Element to obtain firewood permits and availability of mulch.
- Hazard trees and limbs should be reported to the CED Help Desk (878-HELP).



Poor drainage from construction leading to tree mortality

Cultural Resources







Why Does the US Air Force have Cultural Resources Managers (CRM)?

- ✓ The Antiquities Act
- ✓ The Historic Sites Act
- ✓ The National Historic Preservation Act
- ✓ The Archaeological Resources Protection Act
- ✓ The Abandoned Shipwreck Act
- ✓ The Native American Graves Protection and Repatriation Act
- ✓ National Environmental Policy Act
- ✓ Archaeological and Historic Preservation Act

The DOD's CRM Program

- √ 100,000 identified archaeological sites
- ✓ 20,000 National Register eligible and listed properties
- √ 8.5 million acres that have been surveyed for archaeology
- √ 31,870 cubic feet of artifacts and associated records curated to 36 CFR 79
- √ 73 Nation Historic Landmarks

The US Army's CRM Program

- √ 12,953,933 Acres available for survey
 - √ 4,949,038 surveyed (38%)
- √ 77,276 archaeological sites identified
- ✓ 27,997 cubic feet of artifacts
- ✓ 21 NHLs
 - ✓ Most Historic Districts with underappreciated with archaeological components
 - ✓ Yucchi Town

Over 200 sites Protected by law



Cultural Property Protection



- ✓ This symbol (The Blue Shield) means a place protected by international law
- ✓ The 1954 Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict, May 14, 1954.
- ✓ FM 27-10 The Law of War
- ✓ Like the Red Cross

Integrated Pest Management (IPM)







Integrated Pest Management

- ✓ What is a pest? Any plant or animal species that can cause illness or damage crops, trees, ornamental plants, food, stored products or materials or be of a nuisance that is disruptive to activities.
- Examples include (but not limited to) weeds, invasive vegetation, mosquitoes, ticks, rodents, termites and wasps.
- Pest management on military lands is governed by
 DOD Instruction 4157.07 and Air force Instruction 32-1053
- ✓ DOD Pest Management Program IAW parameters of Federal Insecticide, Fungicide & Rodenticide Act (FIFRA)
- Pest Management follows an integrated approach of biological, chemical, physical/mechanical techniques as feasible.



Integrated Pest Management (con't)

- ✓ Pest management includes preventive actions that begin w/the individual:
 - ✓ Exercise good sanitation and eliminate clutter
 - ✓ Close exterior doors and windows
 - ✓ Use of personal protection techniques
 - ✓ Perform good lawn/grounds & interior building maintenance
 - ✓ Avoid attracting feral domestic animals & wildlife
 - ✓ Avoid bring pets into work areas
- ✓ Pest control service is provided by the CED and is requested by calling 878-HELP
- ✓ Only DOD or VA certified pesticide applicators (in respective regulatory categories) can use pesticides on Fort Eustis. <u>There are</u> <u>no exceptions!</u>

Integrated Pest Management (con't)

- ✓ All pest control/pesticide use must be approved by Installation Pest Management Coordinator (Environmental Elements, CED)
 - ✓ Monthly and annual pesticide use reporting requirements
 - ✓ Annual Air Force/DOD pesticide reduction goals
 - ✓ Stormwater permits may be required for certain applications
 - ✓ Only approved pesticides can be used
 - ✓ Pest control/pesticides are only used after a pest status has been confirmed by pest control professionals
- ✓ The term pesticide includes insecticides, herbicides, fungicides, rodenticides, acaricides, algaicides & others.

Pesticides

INDISCRIMINATE, UNMANAGED USE & MISUSE OF PESTICIDES LEADS TO:

- Resistance of target organisms to pesticides,
- Destruction of non-target and beneficial organisms (plants & animals),
- Cumulative contamination of environmental, media
- Potential health and safety complications,
- Wastes time, money & manpower, and
- Legal implications and potential clean-up costs.

Why DOD Policy Requires
Certification &
Program Management!



Restoration







Environmental Cleanup Program



✓ JBLE-Eustis has spent approximately \$60 Million on investigation and cleanup efforts to date



✓ Remaining cleanup costs estimated at \$16 Million through FY17



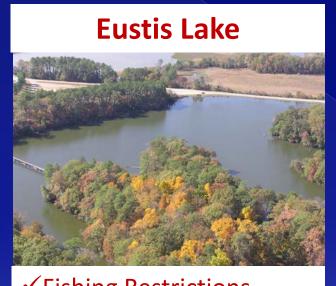






Are there any Restrictions Associated with These Sites?

YES, there are a few...



✓ Fishing Restrictions✓ Catch and release only



Environmental Assessments







Assessments Apply to ALL Environmental Media Areas

REQUIRED SECTIONS OF THE JBLE I-32-101

4.5-Checking and Corrective Action 4.5.1-Monitoring and Measurement 4.5.2-Evaluation of Compliance 4.5.2.1-External Assessments 4.5.2.2-Internal Assessments 4.5.2.3-Activity Level Assessments **4.5.2.3-Nonconformity and Corrective Actions**

Assessments Apply to ALL Environmental Media Areas

FINDING THE "How TOS" IN EMPS

- ✓ 4.5.2.1 Activity Assessments conducted by CED-EE
- ✓ 4.5.2.1 Tab 1 HWAF Site Evaluation Pickup Checklist
- ✓ 4.5.2.2 Regulatory and Permit Inspections
- √4.5.2.3 Internal Inspections Conducted by Activities
- √4.5.2.3 Tab 1 Activity Assessment Multi-Media Checklist
- √4.5.2.3 Tab 2 Activity Facilities and Operations Inventory
 FEVA Form 32-600
- √4.5.2.3.1 Activity Corrective Action Plans (ACAP)
- ✓ 4.5.2.3.1 Tab 1 ACAP Summary Report FEVA Form 32-601

Environmental Laws & Regulations

- •Many laws exist having impacts on mission and operations. These laws are designed to protect human health as well as the environment!
- Penalties for not following environmental laws and regulations can be stiff
 - •Civil Penalties fines up to \$37,500 per incident per day
 - •Criminal Penalties fines up to \$50,000 per day/incident and imprisonment up to 15yrs per incident

Requirements articulated in the publications below.

Executive Orders

DoD Directives

U.S. Air Force Policies and Instructions

- AFPD 32-70
 - Environmental Quality
- AFI 32-7001

Installation Policies

JBLE-I 32-101

Clean Air Act (CAA)

Clean Water Act (CWA)

Oil Pollution Act (OPA)

Superfund

Resource Conservation and

Recovery Act (RCRA)

- Recycling
- Tanks
- •Used Oil
- •Hazardous Waste
- Pollution Prevention

The Legal Aspects of Environmental Compliance

RCRA Civil Fines at Installations

- ✓ Storage of hazardous waste for more than 90 days
- ✓ No hazardous waste determination of containers
- ✓ Incomplete Emergency Contingency Plan
- ✓ Improper labeling of hazardous waste containers
- ✓ Discharge of spent photo fixer into sanitary system by a contractor
- ✓ No weekly inspections of hazardous waste storage site.
- ✓ Failure to keep containers tightly closed
- ✓ Not all hazardous waste handlers have had training
- ✓ No Accumulation Start Date (ASD) on containers
- ✓ Exceeded 55 gallons of hazardous waste in a SAS by the auto Craft Shop
- ✓ Failure to move waste from SAS within 3 days
- √ Three pounds or rags not analyzed
- ✓ Training; no job titles and names
- ✓ Leaking paint cans and unknowns
- ✓ SAS too far from point of generation
- ✓ Un-marked containers of used Oil
- ✓ No fire extinguishers and spill kits

RCRA Civil Fines at Installations

Knowingly make false statement or representation in any document filed, maintained, or used for hazardous waste compliance, e.g. training records, inspection forms, waste identification, etc...

Knowingly transport HW to an unpermitted facility

Potential Felonies

Transport, treat, store (more than 90 days from the Accumulations Start Date), or dispose of HW without a permit

In 2006 Ft Eustis was sited for operating without a RCRA permit for open and unlabeled Containers. Potential fines were negotiated down to \$6448

Key Environmental Law Concepts

- "Responsible Corporate Officer Doctrine" means that anyone in the chain of command, including commanders and directors, can be held accountable for the actions of his/her subordinates regardless of whether he had direct supervision or knowledge of the subordinate's actions.
- "Should have known" by position of leadership or supervision in the organization, the person is responsible for the actions or inactions of his/her subordinates.
- "Knowing" mere knowledge of the facts, but does not have to know that it was illegal or a regulated activity.
- "Negligence" an action or inaction outside your duty which a reasonable person would have not done.

The Regulators

Legal drivers for compliance efforts, established by Federal, State, or local laws to ensure we are in compliance

- Human Health & The Environment
 - U.S. Environmental Protection Agency (EPA)
 - Virginia Department of Environmental Quality (VDEQ)
- Work Place Safety
 - Occupational Safety and Health Administration (OSHA)
- Safe Transportation of Hazardous Materials
 - U.S. Department of Transportation (DOT)
 - Virginia DOT (VDOT)
- > Local
 - Hampton Roads Sanitation District (HRSD)

External Environmental Assessments

External to the Installation Assessments:

- The Assessors:
 - Environmental Protection Agency (EPA)
 - Virginia Department of Environmental Quality (VDEQ)
 - Hampton Roads Sanitation District (HRSD)
 - Department of the Army (Air Force)
- Types of Assessment, Audits, or Inspections:
 - Multimedia All environmental areas or selected groups of areas
 - Waste Water
 - > EMS Audits
 - Air Force Environmental Compliance Assessment and Management Program (ESOHCAMP)
- Installation Corrective Action Plan (ICAP)
 - > All Findings must be recorded in the ICAP
 - > All Findings must be tracked to resolution
 - All Non-resolved Internal Findings must be recorded and tracked

Internal Environmental Assessments

• Assessments and Inspections by EE:

- > EMP 4.5.2.1 Activity Assessments conducted by EE
- > EMP 4.5.2.2 Regulatory and Permit Inspections
- > EMP 4.5.2.4 Environmental Media Assessments

• Inspections by Activities:

- > EMP 4.5.2.3 Internal Inspections Conducted by Activities
- > EMP 4.5.2.3 Tab 1 Form Activity Assessment Multimedia Checklist
- > EMP 4.5.2.3 Tab 2 Form Activity Facilities and Operations Inventory

• Frequency of Activity Conducted Inspections:

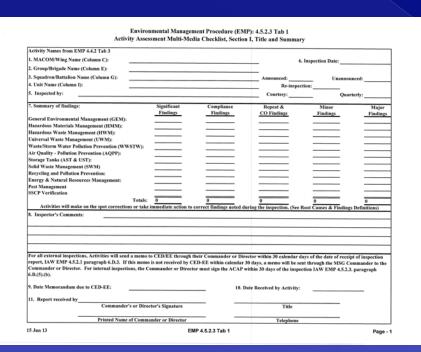
- > AEC Conducts Quarterly Assessments of All Activity Areas
- TSS, SAS, or NHS Weekly (less than 7 calendar days)
- Universal Waste Sites Monthly
- Hazardous Material Storage Areas Monthly

Activity Corrective Actions:

- EMP 4.5.2.3.1 Activity Corrective Action Plans (ACAP)
 - Root Cause Why Did It Happen?
 - Corrective Action Taken
 - Preventive Measures Taken
- > EMP 4.5.2.3.1 Tab 1 Form ACAP Summary Report

Quarterly AEC Multi-Media Inspections

EMP 4.5.2.3 Tab 1 Activity Assessment Multi-Media Checklist



EMP 4.5.2.3 Tab 2 Activity Facilities and Operations Inventory FEVA Form 32-600

Activity	Information	F	Prin	mar	y Pı	ırpe	se	of L	оса	tio	n		_	_	_	_	_	_	0	per	rati	ons	Pe	for	me	d at	Th	is L		tion	(C	hec	k A	ПT	hat	Ap	oly)					_
Building Number	Subordinate Activity (Company/Detachment) (Division/Branch)	Admin Office	Motor Peol	Class Room Training	Maintenance Facility	Warehouse (Storage)	Supply Room	NBC Room	Arms Room	Fraining Area	Tring Range	/chicle Maintenance	Vir Craft Maintenance	'essel Maintenance	Paintine	and Blancher	Zanzenia pare	solvent Staks	Aqueous Parts Washing	Hazardeus Materials Storage	Femporart Storage Site (TSS)	atellite Accumulation Site (SAS)	Non-Hazardous Site (NHS)	Iniversal Waste Sites	Sed Oil	Antifreeze	Verosol Cans	Filters	landling of Electrical and Electronic Equipment (EE)	Recycling Activities	Ombat Life Saving - RMW	Wash Rack	Oil Water Separators	Aboveground Storage Tank (AST)	inderground Storage Tank (UST)	Vrms Cleaning	ead Acid Battery Exchange with Off-site Vendors	Refrigerant Recovery; HVAC Servicing	Stationary Generator	Soiler Plants	Refrigerators; Ice Machines, Windon Air Conditioning Units, etc. Portable heaters Usane	Annual Control of the
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EMP 4.4.6.8.2 Tab 2 Weekly TSS, SAS, & NHS Inspection FEVA Form 32-698

Weekly Within 7 Calendar Days

		Weekly Hazar	rdous and Non Hazard	ous Waste Accumu	lation Site Inspe	ections							
Generating Activ	itv:	Authorized Site 1	No.	TSS	SAS	NHS	HWAF						
		icable Site Items		_									
INSPECTION IT	EMS:	Wee	kly inspections must	be conducted with	in 7 calendar d	lays of last inspec	tion.		$\overline{}$				
1. Does area ha	ve signs indicati	ng the type of TSS, SAS, NHS stor					quired? (HW, UW,	NHW, DOT, E	Empty)				
2. Does area ha			0				he stored materials?		1 .,				
		ed Personnel Keep Out" signs?		19. Are wastes separated from serviceable materials?									
4. Does area ha	ve sign for Eme	rgency Notification Instructions?		20. Ar	20. Are incompatible wastes separated from other wastes?								
		ngency Plan (CP) posted?		21. Do	es container hav	e unique containe	r number?						
6. Does site hav	e adequate aisle	space?		22. Is	correct generato	r or shipper addre	ss present?						
7. Is communication	ation equipment	(telephone, radio, etc) available an	d operational?	23. Is	23. Is DOT proper shipping name & UN/NA on HW labels?								
		ole? Charged? Seals intact?	-	24. Are Accumulation Times being met? SAS 3 Days; TSS 14 Days, UW 270 Da									
9. Is spill kit av				25. Are EPA waste codes correct for HW labels?									
10. Are drums av	ailable for over	packing leaking containers or spill	s ?	26. Is accumulation start date on HW and UW labels as required?									
11. Are wastes st	ored with adequ	rate containment? Sheltered from er	nvironment?	27. Is Emergency Eye Wash & Shower Operable? Weekly Monthly?									
12. Are the conta	iners DOT appr	oved?		28. Is PPE (goggles, gloves, boots, respirators, etc.) available/serviceable?									
Are the conta	iners serviceabl	e? (Free of dents, rust, leaks, etc.)		29. Is	29. Is the area secured when not in use?								
Are bungs/rin	ngs secured? Are	e containers tightly closed?		30. Ar	30. Are only HW, UW, or NHW are accumulated in TSS or SAS?								
Is a Containe	r Contents Log	present & complete for each contain	ner?	31. Are only NHW, UW, Used Oil, Recyclables stored in NHS? No HW!									
Is the Waste	Description Log	with MSDSs present for each was	te streams?	32. Ar	e any containers	stored longer than	n 75 days at the HW	/AF?					
DATE	TIME	NAME OF INSPECTOR	OBSE	RVATIONS		CORRE	CTIVE ACTIONS .	& DATE					
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FEVA Form 32-698 30 Oct 12

EMP 4.4.6.8.2 Tab 2

Monthly Hazardous Materials & Universal Waste Inspections

EMP 4.4.6.6 Tab 2 Monthly Hazardous Material Site Inspections FEVA Form 32-680

EMP 4.4.6.8.2 Tab 3 Monthly
Universal Waste Site Inspections FEVA
Form 32-695

	Inspections must be conducted within 30 days of last inspection.									
Activity:			Bldg No:							
SPECTION ITEM	IS:									
Does area have s Does site have co	'No Smoking' 'Unauthorized sign for Emery opy of Contin L present? Or	signs? I Personnel Keep Out* signs? pency Notification Instructions? gency Plan (CP) posted? ne FEVA Form 32-681 for each H2	14. 15. 16. 17.	Are HMs st Are HMs si Are the con Are bungs/r Are contain	we adequate aisk space? ord with adequate containment? heltered from the environment? tainers serviceable? (Free of dents, rust, leaks, etc.) rings secured? Are containers tightly closed? ers properly labeled as required? Bar Coded? tainers compatible with the stored materials?					
Is communicatio Are fire extingui Is PPE (goggles, Is spill kit availa	n equipment (shers available gloves, boots	beeing used, has it been approved? telephone, radio, etc) available and e? Charged? Seals intact? t, respirators, etc.) available/service eable for the type of HMs e.g., PO	d operational? eable?	21. 22. 23.	Are incomp Are Emerge Is Emergen	separated from serviceable materials? stible HMs separated from other HMs? nency fixe Wash & Shower Required? cy Eye Wash & Shower Operable? Weekly Monthly? secured when not in use?				
DATE	TIME	NAME OF INSPECTOR	OBSERVA	ATIONS		CORRECTIVE ACTIONS & DATE				
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EMP 4466 Tab 2

		Inspections must be conducted within 30 days of last inspection.												
Activity:			Bldg No:											
Do contained Is the type of Is the ASD Excluding U Are ASDs of Are Proken Excluding U Is this UW:	TUW Storage: The storage of the County of t	rked on the label?	11. Excluding UW La 12. Excluding UW La 13. Are coetainers tig 14. Are UW Batteries 15. Are UW Lampa b 16. Are MSUSs prese 17. Is UW site sited w 17. Turn-in Logs? 18. Does site have ce 19. Does site have ce 19. Does site have ce 20. Does sit	inining Devioes: Pesticides: mps, does the Container Number on CCL and container match? mps, are the containers DOT approved? thy closed? being sepenated by type? tent government of the proper septiment of the properties of										
DATE	TIME	NAME OF INSPECTOR	OBSERVATIONS	CORRECTIVE ACTIONS & DATE										

To Prevent This!

















