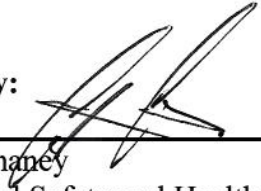


**Office of Secure Transportation  
Standard Operating Procedure**

| <b>Background</b>   |   |
|---|---|
| <b>Document Title:</b><br><br><b>SITE HAZARDOUS WASTE PROCEDURES</b>  | <b>Document Number:</b> <i>(Assigned by POPD)</i><br><br><b>OST SOP 7.00.05</b> |
| <b>Document Owner(s):</b><br><br>ESHB/TRACOM Safety   | <b>Approval Authority:</b><br><br>OST/ ESHB                                     |
| <b>Notify of Changes to SOP:</b><br><br>OST federal and contractor employees  |   |
| <b>Document(s):</b><br><br>Resource Conservation and Recovery Act (RCRA) 40 CFR Part 261<br>Arkansas Pollution Control and Ecology Commission Regulation 23 Part 261<br>Environmental Protection Agency (EPA)<br>Occupational Safety and Health Administration (OSHA)<br>DOE Directives, and other applicable regulations and standards |   |

| <b>Document History</b> |             |   |
|-------------------------|-------------|---|
| <b>Rev.</b>             | <b>Date</b> | <b>Description of Change</b>  |
| 0                       | 05/14/08    | Anthony Chaney, ESHB/TRACOM Safety, Site Hazardous Waste procedures |
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**Prepared By:**



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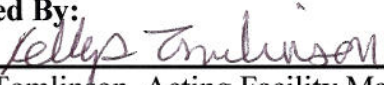
Anthony Chaney  
Occupational Safety and Health Manager  
Training Command Safety Office  
Office of Secure Transportation

5-14-08

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Date

**Reviewed By:**



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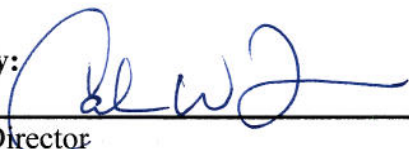
Kelly Tomlinson, Acting Facility Manager  
Training Command  
Office of Secure Transportation

5-14-08

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Date

**Approved By:**



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Cal Irvin, Director  
Training Command  
Office of Secure Transportation

5/8/08

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Date

## I. Purpose

This SOP is provided in keeping with Training Command's (TRACOM) overall goal of providing a safe and healthful working environment for all Department of Energy (DOE)/TRACOM employees and contractors, specifically in the area of hazardous waste management. In addition, this SOP gives guidance derived from federal and state regulations pertaining to hazardous waste generated by conditionally exempt small quantity generators. TRACOM is committed to the safe generation, handling, storage and disposal of hazardous waste in compliance with the Resource Conservation and Recovery Act (RCRA), Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA), DOE Directives, state environmental standards and other applicable regulations and standards.

## II. Scope

The procedures outlined herein apply to all TRACOM personnel, both federal and contractor.

## III. Responsibility

**Training Command (TRACOM) Director** - Provides facilities and resources in support of the site hazardous waste generation and storage.

**TRACOM Safety Office** - Provides federal safety oversight of all hazardous waste management on TRACOM. Act as a single point of contact for the data consolidation of hazardous waste totals maintained on TRACOM on a monthly basis. Conduct periodic inspections of all hazardous generation, waste collection points and disposal processes on TRACOM.

**TRACOM Contractors** - Generate, handle, store, and dispose of all hazardous waste in accordance with RCRA, DOT, EPA, OSHA, DOE, state of Arkansas and other applicable regulations and standards.

## IV. Definitions

**Hazardous Waste:** In general, waste is considered hazardous if they 1) are listed as a hazardous waste, or 2) meet the ignitability, corrosivity, reactivity, or toxicity characteristics outlined in 40 CFR Part 261 and the Arkansas Pollution Control and Ecology Commission Regulation 23( §261, §262.10-11).

**Conditionally Exempt Small Quantity Generator (CESQG):** A hazardous waste generator that does not generate in a calendar month a) more than 100 kilograms (220 lbs) of non-acute waste, no more than 100 Kilograms of acute spill cleanup residue, and c) no more than 1 kilogram (2.2 lb) of other acute hazardous waste. CESQGs are exempt from the RCRA hazardous waste management regulations if they: identify all hazardous waste that they generate, store no more than 1,000 kg (2,200 lb) of non-

acute waste, no more than 100 kg of acute spill cleanup residue, and no more than 1 kg of other acute hazardous waste onsite. CESQGs must also ensure that the hazardous waste they generate is sent to an appropriate offsite disposal facility (40 CFR Part 261.5(a-b, e-j)).

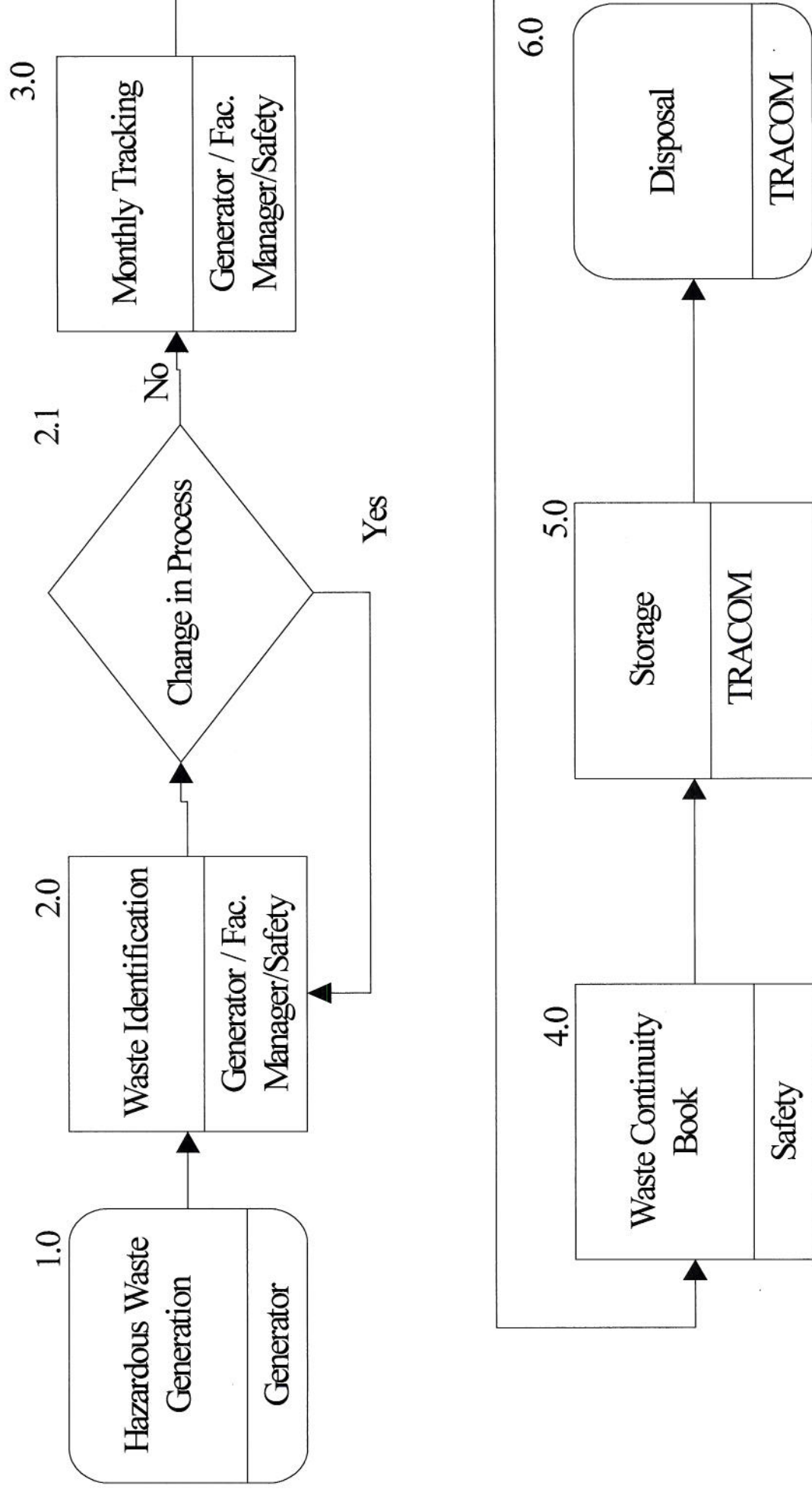
**Waste collection point:** A location on TRACOM where hazardous waste is accumulated and stored prior to disposal.

**Waste generator:** Any person on site whose act or process produces hazardous waste as defined by RCRA, 40 CFR Parts 260-279 or Arkansas Pollution Control and Ecology Commission Regulation 23

**Site Hazardous Waste Continuity Book:** A consolidated monthly total of all hazardous waste generated and stored on site and contractor hazardous waste identification documents. The site hazardous waste continuity book will be maintained in the TRACOM safety office.

**Contractor Hazardous Waste Identification Document:** A document produced by each site contractor listing the type, anticipated monthly totals, and location of all hazardous waste generated and stored on site. The document will also include a description of waste management and disposal procedures.

V. Process



## **1.0 Hazardous Waste Generation**

Site generators of hazardous waste will provide a baseline Hazardous Waste Identification Document, listing the type, anticipated monthly totals, and location of all hazardous waste generated and stored on site. The document will also include a description of waste management and disposal.

## **2.0 Waste Identification**

Each generator located at TRACOM, will submit a copy of their respective Hazardous Waste Identification Document to the site Facility Manager and TRACOM safety for review.

### **2.1 Change in Profile**

Any change in contractor work processes resulting in a change to their hazardous waste profile, will require a revised Hazardous Waste Identification Document. A copy of the revised document will be forwarded to the TRACOM safety office and Facility Manager for review.

## **3.0 Monthly totals**

Each Contractor will provide a monthly total of all hazardous waste generated during the pervious month, to the TRACOM Safety office and TRACOM facility manager, no later than the 7<sup>th</sup> duty day of each month

## **4.0 TSTS Hazardous Waste Continuity Book**

The TRACOM safety office will develop and maintain a Site Hazardous Waste Continuity Book. The book will contain a consolidated monthly total of all hazardous waste generated and stored on site and all Contractor Hazardous Waste Identification Documents.

## **5.0 Storage**

Waste generators will store waste in accordance with this SOP, hazardous waste identification document procedures, RCRA, DOT, EPA, OSHA, DOE, State of Arkansas and other applicable regulations and standards.

The TRACOM safety office will conduct an evaluation of each waste generator's storage location prior to use.

## **6.0 Disposal**

All generators of hazardous waste will dispose of waste in accordance with RCRA, DOT, EPA, OSHA, DOE, State of Arkansas, and other applicable regulations and standards.