

# Reclamation Manual

## Directives and Standards

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- Subject:** Hazardous Materials and Hazardous Waste Auditing and Review Program Implementation
- Purpose:** Implements a documented audit and review program to ensure compliance with applicable Federal, State, and local environmental requirements that affect Reclamation lands, facilities, operations, and the uses thereof.
- Authority:** Environmental Quality Programs, 515 DM 2; and the Resource Conservation and Recovery Act of 1976 (RCRA) (Public Law 94-580) as amended by Public Law 95-609 and Public Law 98-616.
- Contact:** Environmental and Planning Coordination Office, D-5100
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1. **Scope.** Reclamation's responsibilities and requirements for the use of hazardous materials/waste auditing and reviews specified in these directives will apply, where appropriate, to all Reclamation lands, facilities, and operations. Reclamation lands and facilities are defined as all acquired and withdrawn lands under the jurisdiction of Reclamation including appurtenances and improvements on lands including, but not limited to, buildings, structures, installations, equipment, pipeline, well, pit, ponds, lagoon, impoundment, ditch, landfill, and storage unit. Assurance of hazardous materials/waste compliance of users' activities is included e.g., contractors such as irrigation districts, concessionaires, managing agencies (including managing agency contractors), etc., and facilities and lands leased by Reclamation.
2. **Compliance Priorities.** Evaluation of facilities and operations will focus on compliance involving the following statutes, regulations, and issues:
  - Management of Resource-Conservation Recovery Act waste and State regulated waste
  - Spill prevention control and countermeasure plans,
  - Underground storage tank requirements,
  - Pollution prevention,
  - Emergency Planning and Community Right-To-Know Act,
  - Clean Water Act,
  - Clean Air Act,
  - National pollution discharge elimination system permits,
  - Toxic Substances Control Act requirements,
  - Comprehensive Environmental Response, Compensation and Liability Act requirements,
  - Drinking water standards,
  - Land acquisition and disposal requirements,
  - Pest management,
  - Medical waste management where applicable, and
  - Hazardous materials and waste training.

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### 3. Implementation.

- A. Reclamation regions and the Reclamation Service Center will develop, implement, and document a comprehensive audit/review program in order to:
- (1) Ensure compliance with applicable Federal, State, and local environmental requirements, Departmental guidance, and Reclamation policy and directives and standards.
  - (2) Promote sound environmental practices.
  - (3) Monitor environmental compliance of users' activities (e.g., contractors, concessionaires, etc.).
  - (4) Identify and assign environmental compliance responsibility.
- B. Regional and Reclamation Service Center programs will be updated as necessary or at least every 3 years. Draft final and updates of program documentation will be provided to Policy Analysis Office (PAO), D-5100 for comment prior to approval and implementation at the regional level.

### 4. Program Criteria.

- A. Regional and Reclamation Service Center programs will include the following elements:
- (1) Identification of entities and facilities to be audited or reviewed.
  - (2) A schedule which ensures completion of baseline audits or reviews by the end of FY2002.
  - (3) Prioritization of the schedule of facilities and entities with highest potential liability for Reclamation are evaluated early in the process.
  - (4) Environmental auditing procedures including checklists which provide an evaluation of the appropriate statutes and regulations.
  - (5) A mechanism to verify timely and effective actions to address hazardous materials and waste audit findings with respect to both Reclamation facilities and activities, as well as other user activities.
  - (6) A mechanism for reporting hazardous materials and waste auditing program activities to PAO (D-5100). Reporting should include:

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- Tracking completion of audits/reviews,
  - Remaining number of audits/reviews for accomplishing baseline per regional schedule, and
  - Tracking of corrective actions required and their completion schedule.
- B. Audit and review team leaders will be independent from the facility to be audited or reviewed. Independence is defined as not being directly affected by management of the audited or reviewed entity and not eligible to benefit from corrective action or follow-up work. Exceptions to the independence requirement is allowed when minor facilities are audited or reviewed and adherence to the independence requirement would create a significant travel and economic hardship.
- (1) Examples of independence are:
- PAO (D-5100) providing team leadership for audits or reviews at Regional facilities, Technical Service Center, etc.
  - Regional office providing team leadership for area office audits or reviews.
  - Area office providing team leadership for audits or reviews of contractors such as irrigation districts, concessionaires, managing agencies, etc.
  - Interregional audits or reviews would be considered independent as long as a procedure was agreed upon to ensure the report and corrective actions were appropriately issued and tracked.
- (2) An example of minor facilities with economic and travel hardship is:
- The area office hazardous materials coordinator is allowed to conduct all hazardous materials audits or reviews for the managing agencies and concessionaires of a local facility, but is not considered independent of the local dam tenders facility. However, that person could conduct the review or audit of that local dam tenders facility if the costs of bringing in an independent auditor would be unreasonable.
- C. Minimum qualifications to be audit or review team leaders include:
- General knowledge of the facility and its operation.
  - Working knowledge of the hazardous materials and waste rules and regulations.

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- 24 hours of hazardous waste management “specific” formal training; i.e., Hazwoper, Haz-Mat awareness, etc.
- Experience as an audit or review team member within the last 2 years, or completion of audit/review training specific to Reclamation’s audit and review program.