DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY GARRISON, HAWAII
Schofield Barracks, Hawaii 96857-5000

USAG-HI
Regulation 200-4

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Environmental Quality
INSTALLATION HAZARDOUS WASTE MANAGEMENT PLAN (IHWMP)

This regulation provides plans and procedures for handling, storing, and disposal of hazardous materials (HM) and hazardous waste (HW) on United States Army Garrison, Hawaii (USAG-HI) installations.

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CHAPTER 1

INTRODUCTION

1.1. PURPOSE.

a. This regulation sets forth procedures that will ensure that hazardous materials (HM) and hazardous wastes (HW) on U.S. Army Garrison, Hawaii (USAG-HI) installations are handled and managed in full compliance with all federal, state, Army, and local laws, regulations, and directives.

b. The intent of the Installation Hazardous Waste Management Plan (IHWMP) is to provide guidance and ensure proper management of HM/HW on USAG-HI installations while working towards the reduction or eventual elimination of HW generated on all installations. The IHWMP proactively involves all activities currently generating HW in determining methods to minimize or eliminate the generation of HW within their activities. Some examples of waste minimization methods are listed below:

(1) Reuse, to the greatest extent possible, HMs instead of disposing of them. For example, use paints, solvents, and adhesives instead of disposing of them. Maintain only a 30-day inventory of the hazardous materials listed on the unit/activity Authorized Use List. Do not order quantities of hazardous substances in excess of the Authorized Use List (AUL) which may result in the generation of waste.

(2) For degreasing/cleaning operations, units/activities must use the government solvent recycling service as a substitute for solvents regulated as HWs (e.g., 1,1,1 trichloro-ethane, toluene, acetone, methyl ethyl ketone). For more information regarding these products, contact the Directorate of Public Works (DPW) Environmental Division.

(3) Aviation (AVN) units whose technical manuals direct the use of hazardous solvents for specific repair and maintenance activities should use those items as sparingly as possible and follow storage and disposal procedures in this IHWMP. Whenever possible, a non-hazardous substance should be used as a substitute. If this is not possible, then the Technical Manual that calls for the HM or other authorized documentation shall be provided by the unit commander indicating that there is no substitute.

(4) In the event a user receives an inaccurate shipment of HM (i.e., wrong size container, incorrect product, overstock of shelf-life items), return those items to the Hazardous Material Control Point (HMCP).

(5) Identify and manage all HW as identified in this plan.

1.2. SCOPE/APPLICABILITY.

a. The provisions of this plan apply to all personnel and activities involved in the generation, handling, storing, and disposal of HM and HW on USAG-HI installations. Non-USAG-HI tenant units who provide direct support to USAG-HI and are located on USAG-HI installations will also comply with the requirements of this plan.

b. This plan does not include:

(1) Army units/activities located on non-USAG-HI installations that must comply with host regulations or instructions.

(2) Tenant activities independent of United States Army, Pacific (USARPAC), the 8th Theater Sustainment Command (TSC) and 25th Infantry Division (ID) missions and situated on USAG-HI installations are considered separate tenant activities (to include contractors) and shall manage their HW according to the applicable portions of the Resource Conservation and Recovery Act (RCRA), Subtitle C.

(3) Contractor-generated waste from construction projects or service contracts where the contractor is responsible for properly managing and disposing of any and all waste they generate. The contractor must, however, coordinate and provide copies of HW manifests to the DPW, Engineering Division and/or Honolulu Engineer District (HED), Pacific Ocean Division (if applicable).

(4) Radioactive material covered under the provisions of Army Regulation (AR) 385-10 and Department of the Army Pamphlet (DA Pam) 385-24.

(5) Asbestos and polychlorinated biphenyl's (PCB). Asbestos and PCBs are not classified as HW and are not addressed in this plan. Contact the applicable program manager for information on proper management/disposal of asbestos and PCBs (see Appendix B).

(6) The procedures for responding to spills which are detailed in the USAG-HI Spill Prevention, Control and Countermeasures Plan (SPCCP). However, disposal of HW resulting from a spill must comply with requirements of the SPCCP.

(7) Wastes from individual family housing units.

(8) Waste generated from Medical Command (MEDCOM) medical facilities/operations on USAG-HI installations including regulated and non-regulated medical waste, excess and expired pharmaceutical products including all Class VIII medical materials. Medical wastes must be managed in accordance with (IAW) Policy Memorandum USAG-HI-45, Management of Class VIII Medical Supply Items.

(9) U.S. Army Reserve and IX Reserve Support Command (9th RSC) units located on USAG-HI installations are responsible for the management and disposal of HW generated as a result of their activities/processes IAW the applicable portions of Resource Conservation and Recovery Act (RCRA), Subtitle C.

(10) Hawaii Army National Guard (HIARNG) units located on USAG-HI installations are responsible for the management and disposal of HW generated as a result of their activities/ processes IAW the applicable portions of RCRA, Subtitle C.

(11) Tenants listed in paragraphs 1.2.b.(1) through 1.2.b.(11) are not all inclusive or limited to those listed; conditions vary and determination of applicability are made on a case by case basis.

1.3. KEY, APPLICABLE REGULATIONS.

a. Subtitle C of the Resource Conservation and Recovery Act (RCRA) provides "cradle to grave" authority to the Environmental Protection Agency (EPA) for controlling HW from generation to ultimate disposal. RCRA regulates five kinds of HW management activities: Generation, storage, transportation, treatment, and disposal. Title 40 of the Code of Federal Regulations (40 CFR), Protection of the Environment, includes the implementing federal regulations applicable to all aspects of managing HW under the provisions of RCRA.

b. Hawaii Administrative Rules (HAR), Title 11, Chapters 260-281. (Note: The State has authority from EPA to regulate HW management under the provisions of RCRA).

c. The Federal Facility Compliance Act (FFCA) of 1992 amends the solid and HW provisions of RCRA. It waives previous federal sovereign immunity under RCRA and allows state, county and local governments to impose substantive and procedural requirements; require payment of service charges, including fees; and to impose fines and penalties on federal facilities for violations of their solid and HW laws. The FFCA also requires the EPA to inspect all federal facilities annually. In addition, the states may conduct their own independent inspections.

d. AR 200-1, Environmental Protection and Enhancement, requires a written Installation Hazardous Waste Management Plan (IHWMP) that defines responsibilities and provides procedures for the management of HW.

1.4. DEFINITION OF TERMS. Special terms used in this plan are explained below:

a. Defense Reutilization and Marketing Organization - Hawaii (DRMO-HI). The DRMO-HI has accountability and, in most cases, physical possession of the excess, surplus, or foreign excess personal property that has been turned in for disposal by the various Department of Defense (DOD) components.

b. Empty Container (40 CFR 261.7). A container or inner liner removed from a container that held a HM that is regulated as a HW, or a container or inner liner removed from a container that was used to store a HW is empty when the following conditions exist (as described in 40 CFR 261.7):

(1) All wastes were removed that are transferable using the practices commonly employed to remove materials from that type of container, (e.g., pouring, pumping, aspirating) and no more than 3% by weight (for containers less than or equal to 119 gallons) of the total capacity of the container remain in the container or inner liner. For a standard 55-gallon drum, this is equal to approximately one inch of residue on the bottom of the drum.

(2) A pressurized container (i.e., aerosol cans) that has reached atmospheric pressure (i.e., all product and propellant under pressure was expelled by using the product for its intended purpose) is considered empty and is disposable as normal trash, except for containers that previously contained a listed toxic or acute HM (as listed at 40 CFR 261.31 to 261.33). Note: This does not apply to compressed gas cylinders. A hazardous waste determination must be made for any pressurized container that is not completely empty.

c. Generator. The unit, activity, or person (s) responsible for influencing the presence of HW on USAG-HI installations.

d. Hazardous Material (HM). Any material which, because of its quantity, concentration, physical, or chemical characteristics may pose a substantial hazard to human health or the environment when transported in commerce, stored, or otherwise managed.

e. Hazardous Waste (HW). HW is defined as any waste, be it solid, liquid, or contained gas that may pose a hazard to human health or may pollute the environment due to its quantity, concentration, or characteristics. HM becomes HW when it is no longer useable for its intended purpose and must be disposed of in accordance with applicable regulations. A waste is considered a HW if it is listed (see 1.4e(1) below) or meets any of the characteristics described in paragraphs 1.4.e.(2) to 1.4e.(5) below.

(1) Listed Wastes (Toxic and Acute HWs). Known substances that affect the proper functions of a human organism, where prolonged exposure may result in death (e.g., methyl ethyl ketone (MEK), trichloroethylene (TCE), lindane). These wastes are listed in 40 CFR 261.31 to 261.33.

(2) Ignitability. **Solid** wastes that are a **liquid**, having a flash point below 140° F (60° C). A solid waste that exhibits the characteristic of ignitability, compressed gas as defined in 49 CFR 173.300 or an oxidizer as defined in 49 CFR 173.127 is assigned the EPA waste code D001 (see 40 CFR 261.21) (e.g., waste paint, paint thinner, calcium hypochlorite, etc.).

(3) Corrosivity. Having a pH less than or equal to 2, or greater than or equal to 12.5, as determined by a pH meter. A solid waste that exhibits the characteristic of corrosiveness assigned the EPA waste code D002 (see 40 CFR 261.22) (e.g., battery acid, caustic cleaners). Aqueous solutions with a pH of 0 to 7 are acidic (acids); aqueous solutions with a pH of 7 to 14 are basic (bases) (caustic). Acids and bases are incompatible with each other and should never be stored together.

(4) Reactivity. A material that is normally unstable and readily undergoes violent change without detonating or will react violently when mixed with water. A solid waste that exhibits the characteristic of reactivity is assigned the EPA waste code D003 (see 40 CFR 261.23) (e.g., unbalanced lithium batteries).

(5) Toxicity. Extract of the waste fails the toxic characteristic leaching procedure (TCLP), using specified test methods, that equals or exceeds the concentration of contaminants listed and may release toxic substances or cause a poison hazard to human health or the environment. A solid waste that exhibits the characteristic of toxicity is assigned an EPA waste code varying from D004 through D043 (see 40 CFR 261.24) which corresponds to the toxic contaminant causing it to be hazardous.

f. Hazardous Waste Shop Storage Points (HWSSPs). Point at or near the point of generation where wastes initially accumulate, which is under the control and within sight of the process operator that generates waste. A generator may accumulate as much as 55 gallons of HW or 1 quart of acutely HW listed in 40 CFR 261.33(e).

g. Petroleum, Oil, Lubricant (POL) Products. Include, but are not limited to, petroleum based oil, motor gasoline (MOGAS), Jet Propellant 8 (JP-8), diesel fuel, kerosene, fuel oil, antifreeze, hydraulic fluid, grease, and "sludge."

h. Transfer and Accumulation Point (TAP). The 90-day temporary storage area for HW and non-HWs pending disposal through the DRMO-HI , their designated contractor or other channels.

i. Unbalanced Lithium Batteries/Balanced Lithium Batteries. Unbalanced Batteries contains 4.2 grams of lithium to 24.5 grams of sulfur dioxide. Balanced Lithium Batteries contain 2.6-3.0 grams of lithium to 23.5-24.5 grams of sulfur dioxide.

j. Waste Stream. The process through which the waste is, or was. generated.

k. Universal Waste (UW). Any of the following HW that is subject to UW requirements of 40 CFR Part 273. Batteries as described in 273.2, Pesticides as described in 273.3, Thermostats as described in 273.4, Lamps as described in 273.5.

l. Used Oil. Any oil, as defined in 40 CFR 279.1, that has been refined from crude oil, or any synthetic oil, that has been used and as a result of such use is contaminated by physical or chemical impurities. Examples of used oil are used engine oil, gear oil, transmission fluid, hydraulic fluid, brake fluid, power steering fluid, synthetic oil, non-PCB transformer oil, compressor oil, refrigeration oil, mineral oil and oily water exhibiting an oily sheen. All containers of used oil must be marked/labeled "USED OIL".

1.5. EXAMPLES OF HOW HW IS GENERATED.

a. Hazardous material that is opened and cannot be used for its intended purpose, or HM in leaking/deteriorated containers (contaminated, used/spent, or in damaged, rusty, ripped, or torn containers) which meet the definition of a hazardous waste as defined in 1.4.e.

b. Some types of spent solvents used in degreasing and paint equipment cleaning (e.g., acetone).

c. Spent paint strippers/removers or leftover paint that is not useable by the unit/activity for its intended purpose.

d. Fuels, such as diesel, JP-8, and MOGAS that are not reclaimed/recycled/reused due to excessive contamination.

e. Waste petroleum products, such as used oil mixed or contaminated with a HW (solvents, fuels, etc.).

f. Used acids, bases, and mixtures, such as spent battery acid.

g. Used or unused/expired chemical defense equipment (CDE) which contain regulated HW (e.g., M256/M256A1 kits).

h. Batteries: Broken or opened lead acid batteries that are not reclaimed.

i. Unused Flameless Ration Heaters (FRH) if not used to heat a Meal, Ready to Eat (MRE) or collected for reissue.

j. Rags used with an F-listed solvent, used in aviation maintenance operations that have been determined to contain heavy metals, and/or rags that have become saturated with an ignitable hazardous waste.

k. Examples of specific HW streams generated by activities on the installation are listed in Appendix 3.

1.6. RESPONSIBILITIES.

a. General responsibilities are described in AR 200-1. This plan provides specific responsibilities for HW management on USAG-HI installations.

b. The Commander, USAG-HI has overall responsibility for the HW management program and will:

(1) Ensure adequate resources are made available.

(2) Enforce compliance by tenant units/activities and USAG-HI directorates.

(3) Sign as the facility "owner" for all HW notifications, applications for permits and renewals, responses to inspections and reports to the EPA/Hawaii Department of Health (HDOH).

c. The Director, Directorate of Public Works (DPW) will:

(1) Act as the USAG-HI's executive agent for management of the HW program.

(2) Provide training to in-house staff members to ensure they are knowledgeable of HW requirements.

(3) Provide adequate personnel and resources necessary to comply with requirements of the Installation Hazardous Waste Management Plan (IHWMP).

(4) Provide assistance to activity/unit Environmental Compliance Officers (ECO) and Alternate Environmental Compliance Officers (AECO).

(5) Provide guidance on policy and procedures pertaining to the generation, storage and disposal of HW to activity/unit ECO and AECO.

(6) Systematically evaluate waste streams to ensure all potential hazardous or special wastes are properly identified, characterized and managed.

(7) Publish an Environmental Compliance Inspection Checklist (ECIC).

(8) At a minimum, conduct quarterly, unannounced inspections of all units and activities located on USAG-HI installations using all applicable sections of the ECIC in Appendix D. Make recommendations for corrective actions or procedural changes when necessary or advisable.

(9) Coordinate knowledge and response to EPA/HDOH inspections immediately with the command. Keep the command advised of results of inspections and prepare responses to inspection deficiencies.

(10) Implement pollution prevention initiatives to minimize the generation of HW.

(11) Monitor HW generated on USAG-HI installations.

(12) Prepare, consolidate, and submit HW permit applications, permit renewals, and reports for the installation.

(13) Provide for analysis of waste to determine if a waste is hazardous as defined in Federal, State, or local laws and regulations consistent with requirements of 40 CFR 262.11.

(14) Update the IHWMP as necessary.

(15) Develop programs for compliance projects.

(16) Manage the installation Hazardous Materials Management System (HMMS) HW Module for the tracking of hazardous waste on USAG-HI installations.

(17) Conduct quarterly Environmental Quality Control Committee (EQCC) meetings to inform commanders/directors of installation environmental compliance status.

(18) Staff and manage the Environmental Compliance Training program to train and certify all ECOs through the ECO training curriculum which includes, but is not limited to:

(a) A 3-day Basic ECO Certification course, 1-day Refresher course, and a 1-day Senior Leader Environmental Compliance Training (SLECT) course. The training material must be updated at least annually, or as necessary.

(b) Provide a certification exam for the Basic ECO and ECO refresher students. The ECO exam must be approved by the HW Program Manager. Students must achieve a score of 80% or better to gain/retain certification. Exam scores must be documented and transmitted to the HW Program Manager quarterly.

(19) Issue appointment orders, including a written job description delineating specific job duties associated with the position (see format at Appendix E-2), a TAP/90-day Accumulation and Storage Facility (ASF) manager and alternate, using this paragraph as authority, to manage all Transfer Accumulation Points (TAP) who will:

(a) Maintain daily operations of the TAP and ensure adherence to proper operational and record keeping procedures as set forth in this plan.

(b) Ensure that appropriate training (in accordance with the training matrix in Appendix 6) is provided for all personnel handling HW at the TAP.

(c) Maintain training and medical records of the TAP/90-day ASF manager/alternate.

(d) Ensure that the TAPs are properly identified, secured, and fulfills all regulatory requirements.

(e) Maintain the job description/appointment orders on-site at the TAP/90-day ASF and provide copies to the DPW, Environmental Division.

(f) Ensure daily operational requirements comply with all regulatory requirements.

(g) Provide assistance necessary to store and dispose of HW.

(h) Attend the resident Environmental Compliance Officer Certification Course within 30 days of assignment to the TAP/90-day ASF manager/alternate position and maintain certificates of this training on file at the TAP/90-day ASF.

(i) Attend the Annual Environmental Compliance Officer Refresher Course prior to the expiration date on their ECO identification cards and maintain certificates of this training on file at the TAP/90-day ASF.

(j) Attend a DOD-approved Transportation of Hazardous Materials course. Attend refresher training every 2 years. Maintain a copy of the training certificates and the Universal Hazardous Waste Manifest (UHWM) Delegation of Authority memorandum from the HW Program Manager on file at the TAP/90-day ASF.

(k) Complete an initial 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Training. Attend an 8-hour Annual Refresher every year. Maintain a copy of the training certificates on file at the TAP/90-day ASF.

(l) Maintain training records on current employees until facility closure; for former employees, keep for at least 3 years from the date the employee last worked at the facility (40 CFR 265.16(e)). Maintain medical clearance statement for the TAP/90-day ASF manager and alternate on-site.

(m) Maintain records of EPA Form 8700-22, Uniform Hazardous Waste Manifest (UHWM), laboratory analyses, and exception reports for a period of 3 years and Defense Reutilization and Marketing Service (DRMS) Form 1851, Notification for Waste Restricted from Land Disposal (LDR) for a period of 3 years at the TAP/90-day ASF.

(n) Maintain a Site Safety and Health Plan (SSHP) for the TAPs at all installations. The TAP/90-day ASF manager/alternate will ensure and document that all TAP personnel have read and understood the SSHP. The TAP/90-day ASF manager/alternate must update the SSHP as changes occur. All TAP personnel must comply with the requirements of the SSHP.

(o) Maintain an accurate inventory of all HW disposed and stored through the HMMS.

(p) Maintain a Standard Operating Procedure (SOP) for TAP/90-day ASF operations at all installations. The TAP/90-day ASF manager and alternate will sign a certification statement (as in the format provided in Appendix G) that they have read and understand the TAP/90-day ASF HW SOP. Provide a copy of this certification statement to the DPW Environmental Division upon signature. Update this SOP as changes occur or at least annually.

(q) Maintain a site-specific spill contingency plan (SCP) for the TAPs at all installations. The TAP/90-day ASF manager and alternate will sign a certification statement (as in the format provided in Appendix H) that they have read and understand the site-specific spill contingency plan. Provide a copy of this certification statement to the DPW Environmental Division upon signature. The TAP/90-day ASF manager or alternate will review the plan weekly, update the plan as changes occur, and submit the SCP to all emergency response teams, e.g., police, fire, Emergency Medical Systems (EMS), area hospitals, etc..

(r) Maintain environmental reference publications and regulations (see the TAP/90-day ASF Management Section of the Environmental Compliance Inspection Checklist (ECIC) in Appendix D for the required documents).

(s) Obtain and maintain Class I, II, IV and V forklift certification and maintain training certificates on file at the TAP/90-day ASF.

(t) Advise activity/unit ECOs on the proper requirements for packaging and labeling of HW/Non-RCRA waste and ensure proper transportation of these wastes conforms to Federal, State, and Army regulations.

(u) Complete all HW/Non-RCRA waste turn-in documentation as requested by ECOs through use of the HMMS. This documentation must include, but may not be limited to, DRMS Form 1930, Hazardous Waste Profile Sheet, Defense Department (DD) Form 1348-1A, Issue Release/Receipt Document, EPA Form 8700-22, UHWM and DRMS Form 1851, Notification for Waste Restricted from Land Disposal, when waste is transported directly to the DRMO-HI or their designated contractor, picked up by the DRMO-HI contractor from offsite installations and processed through the installation TAP.

(v) Enter all waste pickup requests into the HMMS at the time the request is made and conduct pre-inspections of all HW/Non-RCRA waste from USAG-HI units/activities, as requested by the unit/activity ECO, prior to the transfer of the HW/ Non-RCRA waste to the installation TAP.

(w) Identify all potentially usable materials during the pre-inspection, separate these materials from the waste items and advise the unit/activity ECO to call the HMCP to schedule an appointment to evaluate these items for reissue in order to minimize the amount of waste generated.

(x) Properly package and transport all HW/Non-RCRA waste from ECOs to the installation TAPs IAW all applicable Federal, State, Army and installation requirements.

(y) Manage and ensure that any HW in excess of 55-gallons or 1-quart of acutely HW is transferred to the appropriate installation TAP within 72 hours.

(z) Enter all TAP transactions into the Hazardous HMMS to ensure accurate output.

d. The Director, Directorate of Logistics (DOL) will:

(1) Provide training to in-house staff members, including contractors, to ensure they are knowledgeable regarding HW requirements.

(2) Provide adequate personnel and resources necessary to comply with the requirements of the IHWMP.

(3) Advise activity/unit ECOs on the proper requirements for packaging, labeling, and shipping of HM to ensure that on/off-post transportation of these materials conforms to Federal, State, and Army regulations.

(4) Provide, through the DOL Transportation Division, off-post transportation of all HW shipments to the DRMO-HI or their designated contractor.

(5) Install and manage the installation HMMS for the tracking of HM on USAG-HI installations.

(6) Develop an Authorized Use Lists (AUL) in coordination with DPW Environmental Division and individual units/activities located on USAG-HI Installations.

(7) Manage the operation of the Hazardous Material Control Point (HMCP). The HMCP will:

(a) Monitor HMs requisitioned through the Bldg 6040 warehouse on all USAG-HI installations utilizing the HMMS.

(b) Maintain a centralized location to receive and distribute hazardous material.

(c) Publish and maintain an external HMCP SOP which will outline current HM requisition, handling and turn-in procedures required for HMs at the DOL warehouse at East Range.

(d) Ensure that copies of the Material Safety Data Sheet (MSDS) are provided whenever shipments of HM are distributed to receiving units/activities.

(e) Ensure that HMMS labels are affixed to applicable HM products received at the HMCP.

(f) Inspect, by request, excess and expired hazardous material stocks for acceptance and reissue through the HMCP. Expired products should be evaluated to determine shelf-life extension and excess materials should be returned to the HMCP or transferred to a unit requesting the material through the HMMS.

(8) Manage, store, and dispose of radioactive materials and waste. Manage the Pacific Region Consolidated Radioactive Receiving, Storing, and Shipping Activity for Hawaii, Japan, Okinawa, and other Pacific Basin activities.

(9) Ensure all DOL personnel handling or transporting HM/HW receive adequate training.

e. Hazardous waste generators, to include tenant unit/activity commanders and all USAG-HI Directors.

(1) Examples of HW generators may include, but are not limited to, units assigned/ attached to the 25th ID, 45th Sustainment Brigade (45th SUS BDE), 8th TSC, Hawaii Air National Guard (HIANG), Hawaii Army National Guard (HIARNG), Army and Air Force Exchange Service (AAFES), and USAG-HI. All activities/units are directly responsible for properly handling the HW they generate.

(2) Installation activities such as the DPW and the DOL and outside agencies, such as the DRMO-HI, are responsible for providing assistance with actual management, storage, transportation, and disposal procedures. Hazardous waste, even after disposal, remains the responsibility of the generating activity.

(3) Visiting U.S. and multi-national units/activities (to include reserve and National Guard units) are also required to comply with the requirements of the IHWMP. In cases where visiting units are sponsored by specified tenants, the host unit/activity will be responsible for ensuring the visiting unit's and/or activity's environmental compliance.

f. Commanders of units and heads of activities that use and/or generate HW will:

(1) Comply with all items in the ECIC in Appendix D. NOTE: Some of the items in the checklist are locally imposed requirements that exceed Federal, State, and Army environmental laws, regulations, and directives.

(2) Properly identify, label, and store HW per EPA regulations and the IHWMP. This includes providing accurate identification of the HW and providing that information to the TAP/ 90-day ASF manager/alternate to complete the DD Form 1348-1A (DOD Single Line Item Release/Receipt Document), EPA Form 8700-22, DRMS Form 1930 (Hazardous Waste Profile Sheet), and DRMS Form 1851 prior to turn-in for disposal.

(3) Appoint in writing, as in the example in Appendix E-1, Environmental Compliance Officers (ECO) and alternates from the brigade-level through the company-level of the command or its equivalent, who will serve as the activity's functional HW managers. The Brigade Primary ECO must have rank of E-7 or above and will serve as the liaison between the DPW Environmental Division and the command. Primary and Alternate ECOs down to the company level should have a rank of E-5 or above and be personnel in key positions with environmental, and/or HM responsibilities.

(4) Brigade-level Primary and Alternate ECOs will be assigned to each of the following activities:

(a) 25th Infantry Division.
(i) 2/25 Stryker Brigade Combat Team.
(ii) 3/25 Infantry Brigade Combat Team.
(iii) 25th Combat Aviation Brigade.
(iv) 25th ID Special Troops Battalion (STB)

(b) 8th Theater Sustainment Command (TSC):
(i) 45th Sustainment Brigade
(ii) 8th Military Police (MP) Brigade
(iii) 130th Engineer Brigade

(c) All USARPAC attached units

(d) U.S. Army Garrison, Hawaii (USAG-HI)
(i) Directorate of Public Works (DPW)
(ii) Directorate of Logistics (DOL)
(iii) Directorate of Family, Morale, Welfare and Recreation (DFMWR)
(iv) Directorate of Planning, Training, Mobilization and Security (DPTMS)
(v) Directorate of Emergency Services (DES)

(e) Army and Air Force Exchange System (AAFES)

(5) Submit a written monthly update of revisions or a "no change" status (as in the format provided in Appendix I) of the unit's trained ECOs (to include appointment orders for new ECOs) to the Brigade ECO at their higher headquarters. The Brigade-level ECO will forward a consolidated list of ECOs to the DPW Environmental Division, Stop 253, or by fax (656-1039) or email to the Chief Inspector not later than (NLT) the 15th of each month. A copy of this update must be kept in the unit/activity's records.

(6) Provide command emphasis, adequate resources and personnel to ensure compliance with the IHWMP.

(7) Develop a unit/activity/directorate SOP to ensure compliance with all requirements of this plan. (A sample SOP is provided in Appendix J) Update this SOP annually or as changes occur. Ensure that all personnel who handle HW read and become familiar with the site specific unit/activity/directorate HW SOP prior to handling HW.

(8) Minimize waste generation to the greatest extent possible through Hazardous Waste Minimization (HAZMIN):

(a) HAZMIN is defined as efforts undertaken during the year to reduce the volume and toxicity of waste generated, and the changes in volume and toxicity of waste actually achieved during the year in comparison with the previous year.

(b) HAZMIN methods. There are several methods available to minimize the amount of wastes that are generated.

(i) Inventory control. A majority of the hazardous waste and non-hazardous wastes generated on USAG-HI installations are from unused products. The product is ordered in such quantities that only a portion of the product is used and the remainder is discarded or remains on hand until the shelf life is exceeded. To avoid this condition, utilize inventory control and rotate stock; first in, first out.

(ii) Waste segregation. When a waste is generated, segregation of the wastes is required to increase the reclamation potential of the waste material generated. Commingling of waste products can change a minimally regulated recyclable material into a very stringently regulated hazardous waste.

(iii) Product substitution. This is an excellent way to reduce hazardous waste by using a less hazardous or sometimes even a non-hazardous product in place of another.

(iv) Material handling improvements. Proper handling of hazardous materials and POL products can greatly decrease the amount of hazardous waste generated. Accidents do happen, but storing the HM in the most logical place to minimize the actual handling will reduce the spill or accidental handling possibility.

(v) Recycling. Used oil and oil based products (e.g., diesel, hydraulic and transmission fluid, MOGAS, etc.) will be placed into drums in the Recyclable Material Shop Storage Point (RMSSP). These products are then picked up by contractors and recycled through an energy recovery process.

(9) Eliminate all dumping and abandonment of HW on real property under their operational control. Report to the Military Police any dumping observed.

(10) Properly manage HW at all Hazardous Waste Shop Storage Points (HWSSP) until transfer to an authorized TAP and/or turn-in to the DRMO-HI or their designated contractor.

(11) Maintain an accurate inventory of all HW generated. Inform the DPW of any changes or modifications to the HW inventory (i.e., implementing a process which creates a new waste stream).

(12) Manage all Hazardous Materials IAW AR 385-10 and the following procedures:

(a) A Material Safety Data Sheet (MSDS) must be present in a visible and easily accessible location for each hazardous material.

(b) Do not store incompatible materials near each other; use MSDSs and compatibility charts (Appendix P) to determine which materials may be stored together.

(c) Storage areas shall have secondary containment (i.e., concrete curbs, spill pallets, etc.) to prevent any unplanned or sudden releases into the environment.

(d) A spill kit containing the following items must be kept on-site: (Quantities listed in parenthesis are minimums)

(i) Granular absorbent in new dry-sweep container with lid (50 pounds).

(ii) Absorbent pillows (5) or pads (Bundle of 100).

(iii) Straight edge, non-sparking shovel or dustpan (1).

(iv) Broom (1).

(v) Used dry sweep container with lid (1).

(vi) Rubber gloves (2 pair).

(vii) Rubber boots (2 pair).

(viii) Absorbent booms, 8 or 10 feet long (2)

(e) Ensure all products are used on a "First-in, First-out" basis.

(f) Ensure new products are segregated from in-use containers.

(g) Ensure product shelf lives are not expired; have a shelf life extension program in place to revalidate expiration dates.

(h) Ensure that containers are not damaged or leaking.

(i) Ensure products are absolutely required; promptly and properly turn in excess hazardous materials.

(j) Ensure flammable materials are placed back into flammable storage cabinets at the end of each day.

(k) Ensure that materials which are transferred from their original container are transferred to a new container that is capable of safely storing the material (e.g., do not place flammables in plastic containers larger than one pint; use approved metal containers instead).

(l) Ensure that new containers holding transferred materials are properly marked and labeled (i.e., chemical name, manufacturer, national stock number, Mil Spec, etc.).

(m) Required personal protective equipment items shall be available for all hazardous material handlers IAW MSDSs.

(n) Authorized Use List (AUL) for procurement of hazardous materials will be submitted to the DPW Environmental Division.

(o) Hazardous materials procured either by the credit card or SARSS system will be bar-coded at the Hazardous Materials Control Point (HMCP) IAW the HMCP Operational Guide.

(p) Contractors utilizing hazardous materials on post will provide a listing of hazardous materials utilized annually by 1 February of each year to the DPW Environmental Division.

(13) Create and maintain an updated HM/HW diagram to be included into the unit/activity/directorate SOP. The diagram will show the following locations:

(a) Hazardous Material Storage Points.

(b) Recyclable Material Shop Storage Point.

(c) Hazardous Waste Shop Storage Point (must include an HWSSP evacuation route which must be posted at the HWSSP).

(d) Universal Waste Storage Point

g. The ECO and alternate will:

(1) Serve as the unit/activity primary action officer regarding HW management and all other environmental compliance requirements.

(2) Be assigned on duty appointment orders as a primary or alternate ECO.

(3) Attend the resident Environmental Compliance Officer Certification Course within 30 days of assignment to the ECO position and maintain certificates of this training on file.

(4) Attend the Annual Environmental Compliance Officer Refresher Course prior to the expiration date on their ECO identification cards and maintain certificates of this training on file.

(5) Provide guidance and technical assistance to units/activities. Serve as liaison between the unit/activities and the DPW Environmental Division for additional assistance and guidance.

(6) Maintain the unit/activity/directorate SOP to ensure compliance with all requirements of this plan. (A sample SOP is provided in Appendix J. Update this SOP annually or as changes occur.

(7) Sign a certification statement (as in the format provided in Appendix K) that they have read and understand the unit/activity/directorate HW SOP. Provide a copy of this certification statement to the DPW Environmental Division upon signature.

(8) Conduct and document monthly internal compliance inspections using all applicable sections of the ECIC provided in Appendix D. Report a failure to meet a minimum of 85 percent compliance with all applicable items or noncompliance with any of the starred items on the checklist immediately to the DPW Environmental Division, who will then provide assistance in correcting the deficiencies.

(9) Maintain the unit/activity 30-day Authorized Use List (AUL) to ensure that it is accurate.

(10) Conduct Hazardous Materials inspections to ensure that:

(a) HMs are properly stored and segregated.

(b) All HM is procured through the HMCP.

(c) All HM has a Hazardous Substance Management System (HSMS) bar-code from the HMCP.

(d) No HM in the unit/activity inventory has been purchased from a source other than the HMCP without prior authorization.

(e) HM inventory does not exceed the 14-day AUL.

(f) HM expiration dates are updated.

(g) Expired/excess HMs are turned in to the HMCP.

(11) Conduct and document weekly HWSSP inspections using the HWSSP section of the ECIC.

(12) Contact the TAP/90-day ASF manager/alternate immediately after identifying a HW in order to schedule an on-site pre-inspection and pickup of the HW.

(13) Ensure that HWs are placed in the HWSSP in compatible storage containers and separately from in-use materials or incompatible HW. Sign all HM/HW turn-in/processing documentation. Contact the TAP/90-day ASF manager/alternate for assistance if proper packaging is not available.

(14) If HW is transported directly to the DRMO-HI or their designated contractor or picked up by the DRMO-HI contractor and not processed through the TAP on-post:

(a) Provide accurate information to the TAP/90-day ASF manager/alternate to ensure that all turn-in documentation, EPA Form 8700-22 and DRMS Form 1851 are properly completed prior to any HM/HW shipments off-post.

(b) Be present during DPW, DOL, and DRMO-HI turn-in inspections and ensure deficiencies identified by the DPW, the DOL, or the DRMO-HI during these inspections are corrected.

(15) Verify waste identification when requested by the DRMO-HI or the TAP/90-day ASF manager/alternate.

(16) Maintain an accurate inventory of all HW generated. Inform the DPW of any changes or modifications to the HW inventory (i.e., implementing a process that creates a new waste stream).

(17) Ensure that hazard warnings are posted and that containers of HM/HW are properly marked for identification and kept closed.

(18) Ensure remedial action is initiated for leaks, spills, or improper storage.

(19) Ensure HWSSP personnel who handle, or are occupationally exposed to, HW receive annual training as per Appendix F. Maintain training documentation for 3 years after termination of employment.

(20) Maintain the most current versions of applicable environmental reference publications and regulations (electronic copies on CD-ROM are acceptable):

(a) AR 200-1, Environmental Protection and Enhancement.

(b) AR 420-1, Army Facilities Management.

(c) The USAG-HI, Spill Prevention, Control and Countermeasures Plan (SPCCP).

(d) USAG-HI Reg 200-4, Installation Hazardous Waste Management Plan (IHWMP).

(e) The Environmental Compliance Program Book.

(21) Maintain Material Safety Data Sheets (MSDS) on-site for all HM utilized, stored, received, or shipped.

(22) Maintain a copy of the Installation Spill Prevention and Response Plan on-site.

(23) Develop a site-specific spill contingency plan and an emergency evacuation plan. Update this plan annually or as changes occur,

(24) Publicize to unit/activity personnel, the USAG-HI's environmental policies and procedures to ensure an effective, environmentally safe program.

(25) Be present during HW compliance inspections by EPA, State of Hawaii Department of Health (DOH), or other regulatory agencies.

(26) Provide and document quarterly internal (unit/activity/ directorate) HW/HM training (see training guide at Appendix L) for all personnel with HW/HM responsibilities in the following areas, as applicable:

(a) Hazard communication program.

(b) Hazardous materials management.

(c) Hazardous waste management.

(d) Hazardous waste minimization.

(e) Spill contingency procedures.

(f) Aboveground storage tank.

(g) Underground storage tanks.

(h) Oil/water separator.

(27) Obtain and maintain all personal protective equipment (PPE) required in the MSDS.

h. The Staff Judge Advocate (SJA) or designated representative will:

(1) Be present during all EPA/HDOH inspections, if available.

(2) Develop and forward all responses to enforcement actions from EPA/HDOH.

(3) Negotiate with the EPA/HDOH or other special interest groups regarding compliance actions.

(4) Coordinate with appropriate command and/or law enforcement representatives initiate investigations of potentially criminal activity such as dumping of HM/HW.

i. The Director, Directorate of Plans, Training, Mobilization and Security (DPTMS), Training Division.

(1) Fills 30 slots per class for the initial Environmental Compliance Officer Certification Course and Annual Environmental Compliance Officer Refresher Course.

(2) Provide a minimum of 10 standbys for each ECO training class.

(3) Uniformly allocate ECO training slots to activities/units.

(4) Report "no-shows" directly to unit commanders.

(5) Notify activities/units of confirmation of registration in scheduled courses.

(6) Ensure primary and alternate ECOs are on duty appointment orders prior to scheduling them for ECO training and provide copies of the appointment orders to the DPW Environmental Division.

(7) Ensure all civilians have Standard Form (SF) 182, Request, Authorization, Agreement and Certification of Training, filled out and approved prior to attending the Environmental Compliance Officer Certification Course.

j. Director, Installation Safety Office (ISO) will:

(1) Ensure personnel handling HM/HW comply with all Occupational Safety and Health Administration (OSHA) requirements as detailed in 29 CFR.

(2) Train personnel to comply with the OSHA hazard communication standard as detailed in 29 CFR.

(3) Conduct safety inspections of all HM/HW collection points.

(4) Ensure personnel handling HM/HW receive applicable training and protective equipment.

(5) Submit a DA Form 4283, Facilities Engineering Work Request, for work orders to the DPW, Bldg 104, WAAF, to correct facility safety violations.

k. The Defense Reutilization and Marketing Office-Hawaii (DRMO-HI) supports USAG-HI in the following capacities.

(1) Provide specific guidance for the proper turn-in of HM/HW to the DRMO-HI or their designated contractor.

(2) Conduct pre-inspections of HM/HW for turn-in on a scheduled basis and upon emergency request.

(3) Supply each unit/activity with a current SOP for turn-in of HM/HW.

1.7. ENVIRONMENTAL QUALITY CONTROL COMMITTEE (EQCC).

a. The USAG-HI EQCC was established to advise the Commander, USAG-HI on environmental priorities, policies, strategies, and programs on the installation. The EQCC is chaired by the Commander, USAG-HI. The senior leaders of all USAG-HI subordinate units, USAG-HI Directorates, and major installation tenant activities, are members of this committee. The EQCC meets quarterly and is the forum that will be used to discuss environmental topics or concerns. The EQCC includes the major installation and tenant activities.

b. The EQCC consists of members representing the operational, logistics, engineering, planning, resource management, legal, medical, environmental, morale, welfare, and recreation (MWR), commissary, exchange service, and safety interests of the command, including military installation tenant activities.

c. The EQCC will help to plan, execute, and monitor actions and programs with environmental implications. The committee will identify issues, make recommendations, and advise the Garrison Commander (GC).

CHAPTER 2

LAWS AND LIABILITIES

2.1. ILLEGAL DUMPING/ABANDONMENT. All personnel on USAG-HI installations are prohibited from:

a. Dumping HM/HW onto the ground or into waterways (including storm drains and ditches), sewers, and trash dumpsters. Do not abandon drums containing HM/HW on-post, off-post, or in training areas.

b. Using any trash receptacle on-post to dispose of HM/HW. The purpose of the transfer station and dumpsters is disposal of bulky, non-hazardous refuse only.

c. Using municipal and privately-owned landfills to dispose of HM/HW. Do not abandon drums containing HM/HW off-post.

2.2. REPORTING.

a. Anyone observing illegal HM/HW dumping activities shall immediately report the activity to the Military Police 911 or the DPW Environmental Division (Appendix B).

b. The DPW Environmental Division will report confirmed cases of dumping to the Staff Judge Advocate (SJA), who will coordinate with appropriate command and/or law enforcement representatives to ensure proper investigation and corrective/disciplinary action if warranted.

2.3. PENALTIES.

a. On-Post Dumping. The Commander, USAG-HI, will report violators to tenant unit/activity commanders for appropriate disciplinary action(s). Illegal dumping may also result in Uniformed Code of Military Justice (UCMJ), civil, or criminal penalties, as indicated in section 2.5.1 below.

b. Off-Post Dumping. Promptly report violators to the Department of Health, State of Hawaii and the EPA. The USAG-HI will cooperate in any investigation conducted by an outside agency involving off-post dumping. UCMJ, civil, or criminal penalties may result. Individuals involved in illegal dumping may be held personally liable to pay cleanup costs.

2.4. PREVENTION/CLEANUP/DISPOSAL.

a. Commanders of tenant units/activities and USAG-HI Directors are responsible for monitoring areas under their operational control to prevent illegal dumping.

b. If the responsible party is not found, cleanup and disposal of illegally dumped or spilled HM/HW rests with the current facility or site user/using activity. This responsibility includes all associated costs involved with any testing or cleanup required of contaminated sites.

c. The cleanup of small spills or minor contamination in motor pools or training areas due to daily operations is the responsibility of each individual activity/unit. Use good work practices to minimize contamination of the environment as much as possible.

d. Contact the DPW Environmental Division for assistance/guidance with the cleanup of larger spills that are beyond the capability of the activity/unit.

2.5. LIABILITY.

a. Department of the Army Regulation AR-200-1, 13 December 2007, Chapter 2–2. Army Environmental Policy Statement, addresses the responsibilities and liabilities of military and civilian personnel for compliance with environmental laws and implementing regulations at the Federal and State level. It states that:

> *"(a) All Army organizations and activities will comply with applicable Federal, State, and local environmental laws, regulations, executive orders (EOs), or overseas* Final Governing Standards *(FGS) , develop and implement pollution prevention and control strategies; and establish environmental priorities in consideration of the benefits to the sustainment of missions and operations.*
>
> *(b) All Army organizations and activities will strive to achieve continual improvement in overall environmental, performance and supporting management systems.*
>
> *(c) All Army organizations will ensure that this policy is implemented, maintained, and communicated to all military and civilian employees and supporting contractors. In addition, this policy will be made readily available to the public upon request.*
>
> *(d) All contracts and contract modifications will specify that contractors are liable for any enforcement actions, fines, and/or penalties resulting from their failure to comply with applicable environmental requirements."*

b. All personnel must ensure that activities for which they have responsibility are conducted in accordance with all applicable Federal and State environmental laws. Commanders, supervisors, managers, and operators are also responsible for ensuring that their tenant activities and Government-owned or operated contractors are in compliance and that personnel at all levels understand that neither operational necessity nor budgeting deficiencies will excuse noncompliance.

c. Certain environmental statutes contain provisions for civil as well as criminal penalties for violations. Federal employees may be subject to Federal and/or State criminal prosecution for any illegal activities. Employees may also be held civilly liable for violations of certain environmental statutes.

d. The element of knowledge in these statutes may be established by direct evidence (i.e., an individual was specifically told of the fact in issue) or circumstantial evidence (i.e., indication that the commander was aware of deficiencies and failed to take appropriate action). Furthermore, evidence that individuals shielded themselves from information which they should have known may be admissible to prove guilt.

e. All personnel must ensure that all instances of noncompliance with environmental laws and permits are identified and corrected immediately. Where corrections are dependent on major construction, budget submission, or other long-range programming and execution requirements, the options are limited. Cessation of the activity or negotiation for an exemption with the appropriate State or Federal authority is required to avoid continued violation of

applicable criminal statutes. In circumstances where national security interests mandate continued operation without correction, an exemption should be sought on such grounds through channels. (The President of the United States is the sole authority to grant such an exemption.)

2.5.1. SUMMARY OF CIVIL/CRIMINAL PENALTIES.

a. Hazardous Materials Transportation Act.

(1) Criminal Penalty. Shall be fined up to $250,000.00 / day for individuals and fined up to $500,000.00 / day for organizations under Title 18, United States (U.S.) Code, and imprisoned for not more than 5 years, or both; except that the maximum amount of imprisonment shall be 10 years in any case in which the violation involves the release of a hazardous material that results in death or bodily injury to any person. (49 CFR Subtitle III Chpt.51 #5124)

(2) Civil Penalty. A fine of not less than $250.00 / day and not more than $50,000.00 per each violation per day and not more than the maximum civil penalty of $100,000.00 if the violation results in death, serious illness or severe injury to any person or substantial destruction of property and/or up to 5 years of imprisonment or both. The fine is not less than $450.00/day if the violation relates to training (49 CFR #107.329).

b. Toxic Substances Control Act.

(1) Criminal Penalty. A fine of up to $27,500.00 per day, per violation and/or up to 1 year imprisonment.

(2) Civil Penalty. A fine of up to $32,500.00 per day of violation.

c. Resource Conservation and Recovery Act (RCRA).

(1) Criminal Penalty. A fine of up to $50,000 per day of violation and/or up to 2 years imprisonment for the first offense and both doubled for the second offense. If the crime was committed knowing imminent endangerment to human life will occur or with extreme indifference to human life, the fine is $250,000.00 for individuals and $1,000,000.00 for organizations and/or up to 15 years of prison.

(2) Civil Penalty. A fine up to $32,500.00 per day of violation.

d. Clean Water Act.

(1) Civil Penalty. $32,500.00 per violation per day.

(2) Criminal Penalties. For negligent offenses: $25,000.00 and/or 1 year of prison which is doubled for second offense. If the violation is knowingly, then the fine is $50,000.00 and up to 2 years in prison (doubled for the second offense). If the offense was committed knowing imminent endangerment to human life or serious bodily injury occurred, then the fine is $250,000.00 for individual / $1,000,000.00 for corporation and up to 15 years of prison. Both are doubled for a second offense.

e. Oil and Hazardous Substance Spills.

(1) Criminal Penalty. A fine can be levied of up to $10,000/ day and/or a maximum of 1 year imprisonment and $100,000.00 for failure to report a spill.

(2) Civil Penalties. The fine for failing to notify the appropriate Federal agency of a discharge is a maximum of $250,000 for an individual or $500,000 for an organization. The maximum prison term is five years. Civil penalties are authorized at $32,500.00 for each day of violation or $1,000.00 per barrel of oil discharged. Failure to comply with a Federal removal order can result in civil penalties of up to $32,500.00 for each day of violation.

f. Safe Drinking Water Act.

(1) Criminal Penalty. A fine of up to $5,000.00 per violation per day, not to exceed $25,000.00 per day can be levied.

(2) Civil Penalty. A fine of $20,000.00 for an attempt or threat to tamper with a public water system; a maximum penalty of $32,500.00 for failing or refusing to keep appropriate records, make notes, etc., and a maximum civil penalty of up to $50,000.00 for tampering with a public water system.

g. Clean Air Act.

(1) Criminal Penalty. A fine of up to $250,000 per violation for individuals and $500,000 (or twice the pecuniary gain from noncompliance) per violation for organizations. The maximum term of imprisonment varies depending on the type of violation but may be up to 15 years.

(2) Civil Penalty. Penalties for violation of stationary source requirements, fuels requirements, or most motor vehicle emission requirements (by a company or dealer) may be up to $32,500 per violation (per day or per motor vehicle/engine). Violations of the tampering requirements (by a person other than a company or dealer), or defeat of device provisions by anyone may incur penalties of up to $2,750 per vehicle or engine.

h. False statements. A false statement, representation or certification in the plan or reports can result in a maximum of a $10,000 fine and/or a maximum of 5 years imprisonment.

i. Best Management Practices Violation. Failure to prepare or comply with best management practices that result in a violation of an environmental statute may subject an individual to civil or criminal penalties applicable to violations of the underlying statute.

CHAPTER 3

ADMINISTRATIVE REQUIREMENTS FOR HW GENERATORS

3.1. ARMY FACILITIES WITH EPA IDENTIFICATION NUMBERS.

a. The EPA requires an HW identification number for any installation/activity that:

(1) Generates more than 100 kilograms (220 pounds) or approximately one-half of a 55-gallon drum of HW per month.

(2) Performs operations classified as a treatment, storage, or disposal facility for HW. Temporary storage (less than 90 days) at TAPs is exempt from EPA permitting requirements.

b. Currently, the following installations have received EPA permits as large quantity generators (LQG) or small quantity generators (SQG):

HW Generators/Transporters

Schofield Barracks, WAAF, East Range (LQG)	HI 3210022239
Fort Shafter (SQG)	HI 6214522207

c. Under normal operating conditions, the Pohakuloa Training Area (PTA) is considered a Conditionally Exempt Small Quantity Generator (CESQG) by the State of Hawaii; however, it is an episodic LQG. Therefore, PTA has obtained an EPA identification (ID) number (HIR000000513) and has been granted by HDOH to operate as a CESQG.

d. All other installations are considered Conditionally Exempt Small Quantity Generators (CESQG). If required, the DPW Environmental Division will prepare new EPA notification/permit applications with input from the HW-generating activity. The Commander, USAG-HI signs all notifications/permit applications as the facility "owner."

e. The Commander, USAG-HI reserves the right to require any activity/agency not under the USAG-HI to acquire an individual EPA identification number if deemed necessary by the DPW Hazardous Waste Program Manager.

3.2. INSTALLATION NOTIFICATIONS.

a. All tenant unit/activities and USAG-HI directorates on the installation that currently generate or will generate HW must have written notification of such activities registered with the DPW. Notifications are required prior to the generation of any HW.

b. New generators of HW will notify and obtain the approval of the DPW Environmental Division 30 days prior to generation on-post.

c. If a unit/activity HWSSP is managed without an EPA identification number and generates HW in excess of 220 lbs/month (or 2.2 pounds of an acute HW) or stores more than 2,200 pounds on-site at any one time, then all regulations that apply to a 90-day storage facility will also apply to the HWSSP. The unit/activity will immediately notify the DPW Environmental Division at 656-1111 if such circumstances occur.

d. All tenant unit/activity commanders and USAG-HI Directors will survey their operations for HW generation. Activities that generate or have the potential to generate HW as a result of routine, recurring-type, or one-time operations will appoint an ECO and alternate. Units/ activities shall submit appointment orders identifying the ECO/alternate to the DPW Environmental Division, along with phone numbers and email addresses for the ECOs. Units/activities will also submit an inventory to include: The type and approximate quantity of HW generated within the activity and the location where the wastes are collected (HWSSPs).

3.3. STANDING OPERATING PROCEDURE.

a. The ECOs of units/activities/directorates that generate or have a potential to generate HW must develop and implement an SOP specifically for their HW management activities. The SOP shall address proper HM/HW management, inventory, handling, storing, HW minimization, and transportation requirements at the activity (see the sample SOP at Appendix J).

b. Develop all SOPs prior to any generation of HW on the installation. Hazardous waste generators shall submit a copy of the SOP to the DPW no later than 30 days after publication.

c. The ECO and alternate will sign a certification statement that they have read and understand the unit/activity/directorate HW SOP. The ECO will provide the DPW Environmental Division a copy of this certification statement (see the sample certification statement at Appendix K).

d. All personnel who handle HW will read and become familiar with the site-specific unit/activity/directorate HW SOP prior to any handling of HW.

e. The ECOs of units/activities must also develop and implement a site-specific spill contingency plan for inclusion in the HW SOP. The plan will address spill procedures and installation notification requirements. (see the "Spill Response" section in the sample SOP at Appendix J).

3.4. REPORTING REQUIREMENTS.

a. Appoint in writing (as in the example in Appendix E) ECOs and alternates from the brigade level through the company level of the command or its equivalent, who will serve as the activity's functional HW managers. The Brigade Primary and Alternate ECOs must have an enlisted rank of E-7 or above and will serve as the liaison between the DPW Environmental Division and the command. Primary and Alternate ECOs down to the company level should be personnel in key positions with environmental, and/or HM responsibilities. Submit a copy of these orders to the DPW Environmental Office, Stop 253, 948 Santos Dumont Ave, Wheeler Army Airfield (WAAF) Bldg 105, Schofield Barracks, Hawaii 96857-5013.

b. Each unit/activity will submit a written monthly update of revisions or a no change status (as in the format provided in Appendix I) of the unit's trained ECOs (to include appointment orders for new ECOs) to the appropriate point of contact at their higher headquarters. A copy of this update will be sent to the DPW Environmental Division, Stop 253, or by fax (656-1039) or email to the Chief Inspector no later than the 15th day of each month. A copy of this update must be kept in the unit/activity's records.

3.5. HAZARDOUS WASTE DISPOSAL REQUIREMENTS.

a. All HW generated on the installation is shipped to the DRMO-HI or their designated contractor for disposal or picked up by the DRMO-HI's disposal contractor on-site. Never dispose of HW by means other than through the DRMO-HI. In cases where the DRMO-HI is unable to fully support the operation, the USAG-HI Commander retains the right to issue an emergency contract for disposal support.

b. HW generated from installation construction projects: DPW Engineering Division, United States Army Corps of Engineers (USACE) are managed and disposed through the construction project contractor.

3.6. COMPLIANCE INSPECTIONS (EPA, HDOH, INSTALLATION, ACTIVITY).

a. Environmental Protection Agency Compliance Inspection. If the DPW is given an advance warning of an EPA and HDOH compliance inspection, perform the following:

(1) Immediately inform the Command Group, SJA, and ECOs.

(2) The DPW will develop a schedule and inform ECOs of the date and time of the inspection.

(3) Make all logs, records, and facilities available to the inspector.

(4) If advance warning is not given, the ECO or activity representative will not make available any records or access to the facility until the DPW Environmental Division is notified. The ECO should direct inspectors to the DPW, Environmental Division. The DPW will then notify the Command Group, SJA, and other ECOs.

(5) All deficiencies identified by regulators and associated penalties will be paid by the unit/activity who caused the deficiency that resulted in a Notice of Violation.

b. Installation Compliance Inspections. The activity ultimately responsible for the unannounced compliance inspections on the installation is the DPW Environmental Division. In addition, any authorized external inspection teams will incorporate the ECIC into their inspections. The objective of the unannounced installation level compliance inspections is to ensure that units/activities involved in the generation, handling, storing, and disposal of HM and HW on the installation are in compliance with all applicable Federal, State, and Army regulations and this plan. Copies of findings and recommendations resulting from these inspections will be forwarded to the respective USAG-HI Directors or tenant activity Director/Commander.

c. Activity-level Noncompliance. Activities found in noncompliance will receive written notification identifying any/all deficiencies and recommended corrective actions required. DPW will send notifications to the activity's commander. DPW will forward a quarterly inspection status report to the installation commander. Corrective actions are required for all deficiencies. Submit a written response stating completion of all corrective actions to the DPW Environmental Division within 10 calendar days. If the corrective actions cannot be completed within 10 calendar days, then the response should address what corrective actions are planned and when they will be completed.

d. Activity-level Compliance Inspections. Hazardous waste generating activities are required to use the DPW ECIC to conduct internal compliance inspections. Conduct a complete monthly inspection using all applicable sections of the ECIC. Conduct a weekly inspection of the HWSSP using the HWSSP management section of the checklist. Keep inspection records with the activity's files for 3 years. The goal of these inspections is to ensure that the activity is operating in full compliance with all HW regulations. This will help the activity correct deficiencies and prepare the activity for external (EPA, HDOH, or installation) inspections. Immediately report inspections with a score of less than 85 percent, or not in compliance with all starred items on the ECIC, to the DPW Environmental Division for assistance in correcting problems and deficiencies.

3.7. TRAINING REQUIREMENTS.

a. In addition to training requirements set forth by the EPA, the Department of Transportation (DOT), and the OSHA in the area of HW management, this plan requires additional training for various personnel who handle HM/HW. (The matrix shown in Appendix F identifies the minimum training requirements for personnel who handle HM/HW.)

b. The DPW offers the Environmental Compliance Officer Certification Course and an Annual Environmental Compliance Officer Refresher Course. The Environmental Compliance Officer Certification Course and the Annual Environmental Compliance Officer Refresher Course are scheduled on a monthly basis. Contact the Assistant Chief of Staff (ACOFS), G3 (Training) for course prerequisites and enrollment.

3.8. RECORDKEEPING.

a. The ECO/Alternate ECO will retain the following documentation for a period of 3 years. The asterisk (*) indicates that this documentation is required only when on-site pick-ups take place, e.g., a conditionally exempt small quantity generator manifesting directly to the DRMO-HI or their designated contractor:

(1) EPA Form 8700-22, Uniform Hazardous Waste Manifest (Rev 9-88).*

(2) DD Form 1348-1A, Issue Release/Receipt Document, Jul 91.

(3) DRMS Form 1930, Hazardous Waste Profile Sheet, Oct 06.

(4) Laboratory Analyses and MSDSs.

(5) USAG-HI Form 33, SSP/TAP/90-day ASF Hazardous Waste Collection Log, Oct 08

b. The ECO/alternate will maintain the DRMS Form 1851 (Land Disposal Restriction Form) for a period of 3 years, if applicable.

c. Non-Hazardous Waste Manifests and other contractor receipts.

CHAPTER 4

STORAGE REQUIREMENTS FOR HW GENERATORS

4.1. DEFINITION OF HWSSPs.

a. Hazardous waste generator storage sites are defined as Hazardous Waste Shop Storage Points (HWSSPs). Ensure HWSSPs are located at or near the point of generation such as in motor pools and maintenance bays. As a general rule, locate them at or near the point of generation and within line of sight. These areas are used to collect and store HW from working areas such as shops, motor pools, and laboratories. Each working area that can potentially generate HW will have at least one HWSSP. If more than one unit/activity is located in the general area, each unit/activity should maintain its own HWSSP, unless SOPs clearly delineate the responsibilities of each activity. Once placed, the poly packs that serve as containment at the HWSSPs must remain stationary. No unit/activity will relocate the polypacks without authorization from the DPW, Environmental Division.

4.2. FACILITIES.

a. The ECO of the unit/activity/directorate generating the waste must keep areas or facilities used as HWSSPs under lock and key. This means that the area is properly secured at all times and that the HW generator using the facility maintains control of all entry into the HWSSP.

b. All HWSSPs shall meet minimum specifications of the poly safety-pack and contain three 15-gallon drums each for accumulation of HW unless approval to store larger drums is received from the DPW Environmental Division.

c. The HWSSPs shall have clearly posted signs that read "Danger - Flammables, No Smoking Within 50 Feet, Hazardous Waste Shop Storage Point (HWSSP), Authorized Personnel Only." The following emergency points of contact will have phone numbers posted: ECO and alternate, fire department, Military Police/DOD Police, DPW. Design these signs large enough to read from 50 feet away (1-inch letters).

d. Ensure storage areas are located away from storm and sewer drains, areas with excessive vehicle movement, or areas with little ventilation.

e. Maintain spill kits on-site for each HWSSP containing the following items: (Quantities listed in parenthesis are minimums).

(1) Granular absorbent in new dry-sweep container with lid (50 pounds).

(2) Absorbent pillows (5) or pads (Bundle of 100).

(3) Straight edge, non-sparking shovel or dustpan (1).

(4) Empty over-pack drum to accommodate largest storage container (e.g., 30 gallon over-pack for 15 gallon accumulation drum) (1).

(5) Broom (1).

(6) Rubber gloves (2 pair).

(7) Rubber apron (2).

(8) Rubber boots (2 pair)

(9) Goggles (2 pair).

(10) Absorbent booms, 8 or 10 feet long (2)

f. Ensure the drums used for the accumulation of flammable liquids are properly bonded and grounded with stranded copper or carbon-steel cable.

4.3. STORAGE LIMITATIONS (QUANTITY AND TIME).

a. Never store more than the quantities of HW listed below at HWSSPs. (These quantities refer to HW only.) The TAP/90-day ASF manager/alternate must be contacted prior to reaching these quantities of HW to ensure that the HW can be picked up by the TAP/90-day ASF manager/alternate and transferred to the TAP before exceeding the HWSSP storage limitations. This does not include items such as uncontaminated used oils and fuels that are intended for recycle or reuse for energy recovery.

(1) Fifty-five gallons or less of HW.

(2) One quart or less of an EPA-listed, acute HW. (40 CFR 261.33(e)).

(3) Not more than a 55-gallon container amount of solid HW.

b. Ensure any excess of the above quantities is removed from the HWSSP by the TAP/90-day ASF manager/alternate to a 90-day storage facility (i.e., the installation TAP) or to the DRMO-HI or their designated contractor (if directed by the TAP/90-day ASF manager/alternate) within 72 hours. Unless the DPW Environmental Division specifically authorizes larger containers, use three 15-gallon containers for the accumulation of HW at the HWSSPs to ensure the limits specified in 4.3.a. above are not exceeded. If several different types of HW are stored at the same HWSSP, the total volume of the different wastes shall not exceed the limits in 4.3a above.

c. There is no time restriction for the accumulation of a HW at a HWSSP as long as the quantity limits shown above are not exceeded. There is also no requirement for the accumulation start date to be marked on containers of HW less than or equal to the limits specified in 4.3.a. above. The accumulation start date refers to the date that these limits are exceeded (i.e., the date that the volume of HW at the HWSSP exceeds 55 gallons). Therefore, the ECO must mark the accumulation start date on containers of HW as soon as any of the limits specified in 4.3.a. above are exceeded. Transfer waste in excess of the limits at 4.3.a. above to the TAP within 72 hours, or all of the regulations that apply to a 90-day storage facility will also apply to the HWSSP.

4.4. MANAGEMENT.

a. Restrict access to HWSSPs to the ECO/alternate and personnel authorized by the ECO/alternate. Ensure storage containers are locked or otherwise secured to prevent access by unauthorized personnel. Wrench-tighten openings of all containers (i.e., bungs, lids) when not in use. If a funnel is used, it must have a lid to prevent contamination.

b. Designation of an ECO and/or alternate is required for each HWSSP and the ECO will have operational control of all activities at the HWSSP.

c. The ECO and/or alternate will maintain a separate collection log that accounts for the contents of all items placed into each drum or container. In addition to maintaining a separate collection log for each container inside the HWSSP, the ECO will have an additional copy of the collection logs kept in an area other than the HWSSP for spill response actions.

d. Maintain MSDSs for all HWs stored.

4.5. SEGREGATION.

a. Collect different types of HW in separate drums/containers. Mixing of HW may contaminate potentially recyclable material and may require further laboratory testing prior to disposal. Furthermore, mixing of incompatible wastes may result in potentially dangerous chemical reactions. Properly segregate incompatible waste. If assistance is required to determine HW compatibility, contact either your unit/activity ECO or DPW Environmental Office.

4.6. CONTAINERS.

a. Maintain at least one empty container (not currently in use) for each type of waste collected on hand to allow for smooth transition when containers become full. Ensure all containers used for the collection, storage, and disposal of HW are compatible for the wastes placed into each container. Re-use empty, single trip containers (STC) to collect HW if the containers are in good shape (free of holes, dents, rust, and with extraneous markings removed or painted over).

b. Each unit/activity will obtain its own supply of containers. Procure containers through the unit's/activity's supply channels. Unit/activity ECOs should contact the DPW Environmental Division for guidance on proper containerization procedures if necessary.

c. To allow adequate space for expansion of the contents, do not fill containers to the top. The minimum air space for full drums/containers (various sizes) is as follows:

(1) Provide 3 to 4-inches air space for all 55 gallon drums/containers.

(2) Provide 2-inches air space for all 15 to 25 gallon drums/containers.

(3) Provide 1.5 to 2-inches air space for all 5 gallon containers.

(4) Provide 1-inch air space for all 1 gallon containers.

(5) Provide 1-inch air space for all 1 quart containers.

d. Leaking or deteriorated HW containers will require repacking or over-packing into the next larger size container, with the void space filled with absorbent material (i.e., vermiculite or equivalent). Example: Use an 85-gallon steel recovery drum for repacking a 55-gallon container. Complete all repackaging at the HWSSP, prior to the TAP Manager/Alternate transferring the waste to the appropriate TAP.

e. During the period HW is collected/accumulated in the container, mark or label the container with the wording "IN USE." In addition, mark or label the following information on the container:

(1) The words "HAZARDOUS WASTE." The EPA HW label is recommended. It is available through GSA.

(2) The national stock number (NSN) and the supply name of the product being collected in the container.

f. Place Department of Transportation (DOT) hazard labels on each drum according to the hazard (e.g., corrosive, flammable liquid, oxidizer, etc.).

g. During the period HW is collected/accumulated in the container, HW collection logs must be filled out to reflect the amount of HW placed in the container. HW logs must be provided for each type of waste stored in the HWSSP.

h. After a container is filled, put a line through the words “IN USE” and mark it with the date filled and the term "FULL" above the HW label.

4.7. ON-POST TRANSFER TO A 90-DAY ASF.

a. When 15-gallon collection drums/containers become full or quantities exceed the allowable amounts for accumulation, transfer HW from the HWSSP to the TAP within 72 hours. The installation TAP is designated as the facility that will transfer and accept HW from all HWSSPs located on the installation. Because of the labeling, transportation, and recordkeeping requirements for transporting HW on public highways, only transfer waste from a specific installation’s HWSSPs to the TAP on that installation. Turn-in of HW to a TAP will follow procedures established by the DPW Environmental Division.

b. The ECO will accomplish the following actions prior to turning in HW to a TAP:

(1) Contact the TAP/90-day ASF manager/alternate for pre-inspection.

(2) Provide the TAP/90-day ASF manager/alternate with the MSDS or laboratory analysis and HW Collection Log.

(3) In cases where the HW accumulated is in excess of 55 gallons of HW or 1 quart of acute HW and a laboratory analysis is required, the generator will contact the TAP/90-day ASF manager/alternate immediately for an expedited pre-inspection. The TAP/90-day ASF manager/alternate will contact the DPW work order desk and request a service order to provide laboratory testing and analysis. TAP personnel will pickup and transport the HW container(s) to the TAP within the 72 hour transfer period. When the laboratory analysis is received from the contractor, the TAP/90-day ASF manager/alternate will provide copies to the generating unit/activity ECO.

c. HW generated on Army installations/training areas not at or near the unit/activity/ Directorate HWSSP:

(1) Contact the TAP/90-day ASF manager/alternate on the installation where the waste was generated for pickup of waste generated during field training exercises and/or other activities on the installation, but not *at* or *near* the HWSSP. If deemed necessary by the DPW HW Program Manager, the USAG-HI reserves the right to require any activity/agency not authorized to transfer HW to the DPW TAPs to acquire an individual EPA identification number and manage the HW with applicable provisions in the IHWMP. Containerize non-regulated waste and transport it to the unit/activity recyclable material shop storage point (RMSSP), unless otherwise specified.

(2) On an installation without a TAP, known HW generated during training exercises and/or other activities must be manifested directly to the DRMO-HI or their designated contractor. Generators will contact the DPW TAP Manager/Alternate to coordinate transportation either through the DOL Common Use Land Transport (CULT) or existing DRMO service contract.

(3) Units/activities/agencies will not transport HW from one installation/training area to another installation or abandon drums or containers. Generators will manage and remain with the HW drums/containers until arrangements are made to properly manage, transport and/or dispose of the waste.

d. Do not transport HW found on Army installations/training areas from unknown sources to the HWSSP.

(1) Contact the installation TAP/90-day ASF manager/alternate for waste characterization and proper disposal. The TAP/90-day ASF manager/alternate will contact the DPW, work order desk and request laboratory testing and analysis.

(2) If unknown wastes (orphan drums) are found on an installation that does not have a TAP, the ECO will immediately notify the DPW, Environmental Division for recommended actions.

(3) Direct any questions on unknowns to the DPW, Environmental Division.

4.8. TRANSFER OF WASTE FROM THE HWSSP DIRECTLY TO THE DRMO-HI OR THEIR DESIGNATED CONTRACTOR.

a. This section applies to (but is not limited to) HWSSPs at the following installations:

(1) Helemano Military Reservation (HMR).

(2) Makua Military Reservation (MMR).

(3) Fort DeRussy.

(4) Fort Ruger.

(5) Kilauea Military Camp (KMC).

(6) Pililaau Army Recreation Center (PARC).

b. The TAP/90-day ASF manager/alternate will coordinate the transfer of HW from the HWSSPs at the locations, listed in paragraph 4.8.a. above, directly to the DRMO-HI or their designated contractor when a 15 gallon collection drum/container becomes full.

4.9. MONITORING. The following actions will be accomplished prior to the turn-in of HW to the DRMO-HI or their designated contractor:

a. The ECO/Alternate will contact the DPW TAP/90-day ASF manager/alternate for turn-in guidance and/or pre-inspection.

b. The ECO/Alternate will provide MSDS or laboratory analysis, and HW Collection Log.

(1) The TAP/90-day ASF manager/alternate will complete DD Form 1348-1A (3 copies) and will provide a copy to the ECO who will maintain a copy on-site for 3 years.

(2) TAP/90-day ASF manager/alternate will complete the DRMS Form 1851 as required per 40 CFR 268.7 and will provide a copy to the ECO who will maintain a copy on-site for 3 years.

(3) The TAP/90-day ASF manager/alternate or DRMO-HI contractor will complete the EPA Form 8700-22, per 40 CFR 262.20 and 262. Only individuals with the proper training and delegation authority will sign the EPA Form 8700-22 as generator. The TAP/90-day ASF manager/alternate will maintain a list of authorized individuals on file at the TAP and at the DPW, Environmental Division.

(a) After the transporter accepts the waste, the TAP/90-day ASF manager/alternate will retain the "generator" copy at the TAP. The TAP/90-day ASF manager/alternate will provide a photocopy to the DPW Environmental Division HW Program Manager and to the ECO/alternate to retain on-site for a period of 3 years.

(b) Upon acceptance of the HW cargo, the transporter (driver) will sign and date the EPA Form 8700-22 as Transporter No. 1. The date is the actual date of movement. After arrival and acceptance at the DRMO-HI or their designated contractor, the transporter will remove the Transporter No. 1 copy of the EPA Form 8700-22 and forward to CULT or the contracted EPA licensed transporter.

(c) Once the EPA Form 8700-22 is signed and waste(s) transported off-site, the TAP/90-day ASF manager/alternate will annotate the date the EPA Form 8700-22 manifest number was issued on the USAG-HI Form 28, Manifest Log (Appendix M). The TAP/90-day ASF manager/alternate will annotate dates 35 days and 45 days out from the actual transportation date.

(d) If the TAP/90-day ASF manager/alternate does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility, the TAP/90-day ASF manager/alternate must, within 35 days of the date the waste was accepted by the initial transporter, contact the transporter and/or the owner or operator of the designated facility to determine the status of the HW. The ASF manager/alternate must document all phone conversations and applicable data on the USAG-HI Form 28, Manifest Log (Appendix M).

(e) If the TAP/90-day ASF manager/alternate has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter, the TAP/90-day ASF manager/ alternate must forward an Exception Report to the EPA Regional Administrator for Region IX. The Exception Report will include a legible copy of the manifest for which the generator does not have confirmation of delivery and a cover letter signed by the generator or authorized representative explaining efforts taken to locate the HW and results of those efforts.

(4) The TAP/90-day ASF manager/alternate will ensure that one copy of the DRMS Form 1930 are completed with the DRMO-HI guidance and that the TAP/90-day ASF manager/ alternate has certified the DRMS Form 1930 by signature. If the DRMS Form 1930 is not completed under the above requirements, the TAP/90-day ASF manager/alternate shall make corrections and return to the DRMO-HI, Hazardous Waste Storage Facility (HWSF) or their designated contractor with corrected copies.

(5) The ECO/Alternate will ensure that one copy of the USAG-HI Form 33, SSP/TAP/ 90-day ASF Hazardous Waste Collection Log (Appendix N) is completed and provided to the TAP/90-day ASF manager/alternate. The log will reflect the exact amount and content of the waste in the container being transported to the DRMO-HI, HWSF or their designated contractor. If logs do not match the contents of containers being transferred to the DRMO-HI HWSF or their designated contractor, the DRMO-HI HWSF or their designated contractor will refuse the shipment and request the ECO provide proper documentation.

(6) The TAP/90-day ASF manager/alternate will ensure that one copy of the MSDS accompany all wastes being turned into the DRMO-HI, HWSF or their designated contractor. Submit the MSDS in lieu of a laboratory analysis when specific generator knowledge and exact waste stream generation is identified by the ECO. The DRMO-HI, HWSF or their designated contractor will ensure that MSDSs reflect contents of containers.

(7) The TAP/90-day ASF manager/alternate will ensure that one copy of the laboratory analysis, if necessary, accompany all wastes being turned into the DRMO-HI, HWSF or their designated contractor. Laboratory analysis is required if generator knowledge of the exact waste stream is not known.

(8) The TAP Manager/Alternate shall ensure all documentation is entered properly into the HW section of the HMMS.

4.10. UNIVERSAL WASTE (UW) MANAGEMENT.

a. Universal Waste (UW) batteries. Examples of UW batteries used on USAG-HI installations include, but are not limited to, tactical and non-tactical/rechargeable and non-rechargeable Lithium-Sulfur Dioxide, Lithium-Manganese Dioxide, Lithium Thionyl Chloride, Magnesium, Nickel-Cadmium, and Nickel-Metal Hydride batteries. Waste characterization of these batteries is detailed in the Department of the Army publication, Technical Bulletin (TB) 43-0134, Battery Disposition and Disposal. The UW generator must manage UW batteries in a way that prevents releases of any UW or component of a UW to the environment, as follows:

(1) The UW generator must contain any UW battery in a container which must be closed, structurally sound, compatible with the contents of the battery, and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable

conditions. Any battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container must be managed and disposed as HW.

(2) Special handling procedures are required for non-rechargeable lithium batteries outfitted with a complete discharge device (CDD). Lithium batteries will be turned in to the TAP and managed as UW IAW 40 CFR 273 and Hawaii Administrative Rules (HAR) 11-273. The generator will not activate the CDD. The generator will ensure that CDD and exposed terminals are protected and taped. The batteries will be placed in a plastic bag and then inside a sturdy cardboard box. The generator will provide an itemized list of the amount and type of batteries (i.e. BA 5590, BA 5800) and a statement certifying that the lithium batteries are of the balanced type (see section 5.8.e.(1)). Lithium batteries that do not qualify under the universal requirements (i.e. cracked, leaking) will be managed and disposed of as Hazardous Waste.

(3) Unbalanced Lithium batteries (contains 4.2g of lithium to 24.5g of sulfur dioxide) will be managed IAW 5.8.e. In unbalanced batteries, lithium metal can react with the electrolyte in the absence of sulfur dioxide to produce lithium cyanide (toxic), lithium hydroxide (corrosive), heat and methane (flammable) which may cause rupturing. DRMO will not accept physical custody.

b. Universal Waste pesticides. The UW generator must manage UW pesticides in a way that prevents releases of any UW or component of a UW to the environment. The UW pesticides must be contained in one or more of the following:

(1) A container that remains closed, structurally sound, compatible with the pesticide, and that lacks evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions; or

(2) A container that does not meet the requirements of paragraph 4.10.b.(1) of this section, provided that the unacceptable container is over-packed in a container that does meet the requirements of paragraph 4.10.b.(1) of this section.

c. Universal waste thermostats. The UW generator must manage UW thermostats in a way that prevents releases of any UW or component of a UW to the environment, as follows: The UW generator must contain any UW thermostat in a container which must be closed, structurally sound, compatible with the contents of the battery, and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. Any thermostat that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container must be managed and disposed as HW.

d. Universal waste Lamps. The UW generator must manage lamps in a way that prevents releases of any UW or component of a UW to the environment, as follows:

(1) The UW generator must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. UW generators shall place spent lamps into the original containers to ensure the safe handling of bulbs.

(2) The UW generator must immediately clean up and place in a container any lamp that is broken and any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. Containers must be closed, structurally sound, compatible with the contents of the lamps and must lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or other hazardous constituents to the environment under reasonably foreseeable conditions.

4.10.1. UNIVERSAL WASTE LABELING/MARKING.

a. The UW generator must label or mark the UW to identify the type of UW as specified below:

(1) UW batteries (i.e., each battery), or a container or tank in which the batteries are contained, must be labeled or marked clearly with the following phrases: "Universal Waste-Battery" or "Universal Waste-Batteries."

(2) UW Pesticides. The label that was on or accompanied the product as sold or distributed; and the words, "Universal Waste-Pesticide(s)."

(3) UW thermostats (i.e., each thermostat), or a container or tank in which the thermostats are contained must be labeled or marked clearly with the following phrase: ``Universal Waste-Mercury Thermostat(s)."

(4) UW Lamps: Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with the following phrase: ``Universal Waste-Lamp(s)."

b. The Accumulation Start Date (ASD) must be annotated on the container when the first quantity of waste is generated (the date the item was taken out of service) for that specific container.

4.10.2. ACCUMULATION TIME LIMITS.

a. The units/activities that generate UW must turn in the waste to the appropriate TAP within 6 month of the ASD.

b. For UW Lamps, units/activities can accumulate no more than 150 of any type of spent lamps or for no more than 6 months from the ASD.

c. The TAP/90-day ASF manager/alternate of UW may accumulate UW for no longer than one year from the date (ASD) the UW is generated. The UW will be transported and turned-in to DRMO or their designated contractor.

4.10.3. TRANSFER OF UNIVERSAL WASTE TO A 90-DAY ACCUMULATIONSTORAGE FACILITY.

a. The ECO will accomplish the following actions prior to turning in UW to a TAP:

(1) Contact the appropriate TAP/90-day ASF manager/alternate for pre-inspection to ensure that all packaging, marking, and labeling requirements are met.

(2) Provide, complete, and/or sign the following documents that are required from the generator:

(a) MSDS.

(b) UW Lamp Collection Log (for UW lamps).

b. A UW transporter must comply with all applicable U.S. Department of Transportation regulations in 49 CFR part 171 through 180 for transport of any UW that meets the definition of hazardous material in 49 CFR 171.8. For purposes of the Department of Transportation regulations, a material is considered a hazardous waste if it is subject to the Hazardous Waste Manifest Requirements of the U.S. Environmental Protection Agency specified in 40 CFR, Part 262. Because UW does not require a hazardous waste manifest, it is not considered hazardous waste under the Department of Transportation regulations.

c. Some UW materials are regulated by the Department of Transportation as hazardous materials because they meet the criteria for one or more hazard classes specified in 49 CFR 173.2. As UW shipments do not require a manifest under 40 CFR 262, they may not be described by the DOT proper shipping name ``hazardous waste, (l) or (s), n.o.s.", nor may the hazardous material's proper shipping name be modified by adding the word ``waste".

4.11. MANAGEMENT OF BURN ASH RESIDUE.

a. Burn ash residue will be managed as a hazardous or non-regulated waste by the Range Division, Hawaii ECO according to the procedures outlined in this plan. The ash must be collected in separate consolidation drums according to the type of propellant residue (105mm, 155mm, 81mm, 60mm) IAW the Range Division Hawaii SOP. An inert certification statement signed by the Quality Assurance Specialist Ammo Surveillance (QASAS) is required for the residue each time a burn is conducted and prior to placing the residue in the consolidation drums. Individuals signing the certification/verification statement must be identified in writing as authorized to certify/verify and have a copy of this authorization on file at the TAP and with the Defense Reutilization and Marketing Office-HI (DRMO-HI).

b. Pohakuloa Training Area (PTA). The TAP/90 day ASF manager/alternate will accept burn ash residue from units/tenants/activities from the range at the PTA TAP IAW the procedures outlined above. The TAP/90-day ASF manager/alternate will then coordinate and arrange with DRMO and/or approved contractor for pick-up and transport to DRMO or their designated contractor. Non-tenant activities, i.e., HIARNG, United States Marine Corps (USMC) shall manifest the waste directly to a Treatment Storage and Disposal Facility (TSDF) through the activity's own contract.

c. Transfer of Burn ash residue to the TAP. The burn ash residue will be turned in to the appropriate TAP as a non-regulated or hazardous waste IAW the procedures outlined in this plan. Each type of residue (105mm, 155mm, 81mm and 60mm) must have a laboratory analysis on file for turn-in to the TAP. The same lab analysis may be used each time the residue is turned-in to the TAP provided that the residue is collected IAW the Range Division Hawaii SOP, the residues are from excess propellant of the same type and composition as those identified on the laboratory analysis, they are collected separately and the process generating the residue has not changed. In addition to the required turn-in documentation, the Range Division ECO must also provide a copy of the QASAS inert certification/verification

statement for each bag of residue in the collection drum at the time of pre-inspection by the TAP personnel. No burn ash residue can be transferred to the TAP without the proper QASAS inert certification/verification.

4.12. MANAGEMENT OF SMOKE POTS.

a. Wheeler Army Airfield (WAAF). The storage of Waste Military Munitions (WMM) smoke pots will be stored at the Wheeler Ammunition Supply Point (ASP) Bldg 1541W. ASP personnel will contact the TAP/90-day ASF manager/alternate requesting disposal and transport to DRMO-HI or their designated contractor. In addition to the required turn in documents, an inert certification statement certified/verified by Quality Assurance Specialist Ammo Surveillance (QASAS) is required. Individuals signing the certification/verification statement must be identified in writing as authorized to certify/verify and have a copy of this authorization on file at the TAP and with the DRMO -HI. The TAP/90-day ASF manager/alternate will inspect smoke pots prior to pick up to ensure proper packaging and labeling. TAP/90-day ASF manager/alternate will coordinate and arrange with DRMO-HI for smoke pots to be picked up and transported from Bldg 1541W to DRMO-HI.

b. Pohakuloa Training Area (PTA). The storage of Waste Military Munitions (WMM) smoke pots will be stored initially at the PTA Ammunition Supply Point (ASP) Bunker #11. Once the PTA ASP has accumulated a quantity of smoke pots determined by the QASAS to initiate transfer procedures, the PTA ASP will coordinate with the WAAF ASP to ship and consolidate the spent smoke pots at the WAAF ASP prior to disposition as identified in 4.11.a. above. ASP personnel will contact the TAP/90-day ASF manager/alternate requesting disposal and transportation to DRMO-HI.

4.13. MANAGEMENT OF USED OIL AND USED PETROLEUM, OIL AND LUBRICANT (POL) RELATED RECYCLABLE MATERIALS AND WASTE.

a. General. The Recyclable Material Shop Storage Point (RMSSP) is used for the accumulation of used oil and other recyclable materials (e.g., used oil, transmission or power steering fluid, diesel, synthetic oil, antifreeze, gasoline) and storage of Non-Regulated wastes.

b. Management of Containers. Recyclable materials will be stored at the RMSSP in DOT/POP approved 55 gallon steel drums. The containers must be compatible for the material they are holding and in good condition (i.e. free of deficiencies, such as leaks, rust, corrosion, unserviceable bungs, dents, bulges, and/or grooves). There should be at least 12 inches of aisle space between drums. The containers must have the following proper air spaces (free-board) between the top of the contents and the lid: for 55-gallon drums/containers, 3 to 4 inches; for 15-gallon drums/containers, 2 to 3 inches; for 5-gallon containers, 1.5 to 2 inches; for 1-gallon containers, 1 inch.

c. Segregation of recyclables. Never mix recyclable materials in the same drum. Mixing recyclable materials may contaminate the whole drum, requiring further laboratory testing prior to disposal. Incompatible recyclable materials should never be stored together. Improper storage may result in a potentially dangerous chemical reaction. Check the compatibility chart located at Appendix P to determine whether or not recyclable materials may be stored together. Incompatible recyclable materials should never be stored where they share the same secondary containment, as in the rare case that both containers leaked, a reaction could occur.

d. Security. Drum bungs or rings will be wrench tightened and the RMSSP will be locked at all times when recyclable material is not being added to the drums.

e. Signage. RMSSPs will be identified on the front by a 28" x 35" danger sign reading as follows:

FLAMMABLES
NO SMOKING WITHIN 50 FEET

RECYCLABLE MATERIAL
SHOP STORAGE POINT (RMSSP)
AUTHORIZED PERSONNEL ONLY

IN CASE OF EMERGENCY CONTACT:
PRIMARY ECO:
ALTERNATE ECO:
FIRE DIVISION:
MILITARY POLICE:
DPW: 656-1111/656-1275

Point of contact phone numbers will be listed in 1" letters in appropriate spaces. RMSSPs will be identified on all four sides by metal DANGER FLAMMABLES signs (Appendix U). A diagram showing a primary and alternate evacuation route will be posted on or next to the RMSSP.

f. Labeling. Drums will be color-coded and labeled appropriately as stated below:

2" BLACK LETTERING	**BAND COLOR**
USED OIL ONLY	Red
ASBESTOS-DANGER INHALATION HAZARD	White
USED ANTIFREEZE ONLY	Green
USED JP-8/DIESEL ONLY	Yellow
USED MOGAS	Fluorescent Orange

The color band will be painted around the middle third of the drum and the lettering will be stenciled on this band. Drums containing materials meeting the definition of any of the DOT hazard classes will be labeled with the appropriate DOT hazard label (e.g., MOGAS will be labeled with the "Flammable Liquid" label). Consult MSDSs to determine whether materials meet the definition of any of the hazard classes. All drums will be numbered to correspond with the accumulation log.

g. Accumulation Logs. The USAG-HI Form 31, RMSSP/NRW Collection Log, provided at Appendix X will be used to document the type and amount of recyclable material added to a drum in the RMSSP. One form should be used for each accumulation drum. Place the same number on the log and the drum to avoid confusion on which log corresponds to which drum. One copy of the accumulation log will be kept inside the RMSSP and one copy will be kept in another readily available location (i.e., an office at the motor pool, etc.). Both copies *must* be kept current to provide *accurate* information in the case of emergency. Accurate logs can save time, money, and even lives in the case of an emergency response, as responders will know what hazards they may face in the response operation.

h. Material Safety Data Sheets. One copy of the MSDS for each recyclable waste will be kept inside the RMSSP and one copy will be kept in another readily available location (i.e., an office at the motor pool, etc.).

i. Bonding and Grounding. Flowing liquids can charge drums with static electricity. To prevent fires and explosions that can be caused by this static buildup, the following procedures must be followed:

(1) Drums containing flammable liquids must be properly grounded by connecting the drum and the grounding point with a stranded copper or carbon steel cable.

(2) When transferring flammable liquids between containers (e.g., when pouring waste thinner from a one gallon can to the 55 gallon accumulation drum), the containers must be bonded (connected) together with a stranded copper or carbon steel cable. See the diagram at Appendix W.

(3) There will be no electrical equipment or potentially spark-generating machinery operated within a 50' radius of the polypack when transferring flammable liquids.

j. Turn-in of Recyclable Materials from the RMSSP. A scheduled pick up of recyclable materials by the contractor will be conducted on a monthly basis. If scheduled pick up does not occur then contact the DPW Service Contracts Branch who will contact the contractor to come and pump the drums into a pump truck for recycling. Drums may then be re-used for accumulation of the same recyclable material.

k. Used dry sweep and used rags/pads generated from maintenance/service contaminated with only POL will be transferred to the TAP for disposal as non-regulated waste.

(1) Place used rags/absorbent pads in 10 gallon clear plastic bags and store the bags in a closed metal container marked "USED POL RAGS/PADS". Affix non-regulated waste label on drum and mark the label with the words "USED POL RAGS/PADS".

(2) Used dry sweep must be stored in closed, open-head metal drums. Affix non-regulated waste label on drum and mark the label with the words "USED POL DRY SWEEP".

(3) Used dry sweep and used rags/pads must not be beyond saturation to the point that there is free-flowing liquid in the bag. Saturated rags must be managed separately. Contact the TAP/90-day ASF manager/alternate for guidance on managing saturated POL rags/pads.

(4) Call the TAP/90-day ASF manager/alternate for pickup. The TAP/90-day ASF manager/ alternate will transfer the bags of rags/pads from the collection drums to a portable container for transportation to the TAP. The unit/activity will retain possession of the drum used to collect the rags/pads for future use. Used POL Dry Sweep must be picked up in a collection drum provided by the unit/activity. Used POL Dry Sweep drums will not be returned to the unit/activity.

l. A spill kit containing the following items must be kept on-site in close proximity to the RMSSP: (Quantities listed in parenthesis are minimums)

(1) Granular absorbent in new dry-sweep container with lid (50 pounds).

(2) Absorbent pillows (5) or pads (Bundle of 100).

(3) Straight edge, non-sparking shovel or dustpan (1).

(4) Broom (1).

(5) Used dry sweep container with lid (1).

(6) Rubber gloves (2 pair).

(7) Rubber boots (2 pair).

(8) Absorbent booms, 8 or 10 feet long (2).

(9) Empty over-pack drum to accommodate largest storage container (e.g., 85 or 95 gallon over-QA pack for 55 gallon accumulation drum) (1).

m. Solvent Parts Washers.

(1) Cleaning vehicle parts should be done by using the DPW contractor provided solvents parts washers only. Conversely, the DPW provided solvent parts washers should be used only for cleaning vehicle parts.

(2) Only the DPW-provided solvent parts washer should be used for cleaning vehicle parts. Any other solvent parts washer (e.g. used for cleaning vehicle parts or weapons) must be approved by the DPW Environmental Division. Approval will be contingent upon the prior establishment of a process for the recycling or disposal of the used solvent.

(3) Solvent parts washer lids must be locked when not in use and kept free of dry sweep, rags, and other foreign matter

4.14. MANAGEMENT OF NON- REGULATED WASTE.

a. All waste(s) that do not meet the definition of a hazardous waste in 40 CFR261, RCRA-C/D or any other type of regulated waste will be turned in to the installation TAP as a Non-Regulated Waste. Contact the TAP/90-day ASF manager/alternate for guidance on making a proper waste determination, if necessary.

b. Non-Regulated Waste should be stored in the RMSSP prior to transfer to the installation TAP.

(1) Mark/Label the container holding the waste "Non-Regulated Waste" and indicate the name of the waste on the container or the label. Drums should be positioned so the markings/labels are easily read.

(2) Material Safety Data Sheets. One copy of the MSDS for each non-regulated waste will be kept inside the RMSSP and one copy will be kept in another readily available location (i.e., an office at the motor pool, etc.).

(3) Call the installation TAP/90-day ASF for pickup.

CHAPTER 5

TRANSFER AND ACCUMULATION POINT (90-DAY ACCUMULATION AND STORAGE FACILITY)

5.1. DEFINITION OF TAP/90-DAY ASF.

a. The TAP/90-day ASF serves as the only 90-day HW accumulation/storage facility for USAG-HI installations. The TAP serves as a receiving and temporary storage area for all HW turned in from HWSSPs, Units/Activities prior to final transfer to the DRMO-HI or their designated contractor. Accept HW at the TAPs only when: (a) transported within the installation's boundaries with the adoption of the HAR 262.20 (Reference 2.e), (b) transporter has an assigned EPA identification number, and/or (c) identified as a Unit/Activity of the USAG-HI.

b. The Schofield Barracks, East Range TAP at bldg-6040, Fort Shafter TAP at Bldg 420, and Pohakuloa Training Area (PTA) TAP at bldg-T330 is operated by the DPW Environmental Division. Off-site installations include, but are not limited to, Helemano Military Reservation (HMR), Makua Military Reservation (MMR), Pililaau Army Recreation Center (PARC), and Kilauea Military Camp (KMC).

c. All applicable requirements of a TAP/90-day ASF are defined in the 40 CFR 262. Establish the requirements prior to operating a TAP/90-day ASF. This section identifies the major requirements of a TAP/90-day ASF. Future TAP/90-day ASFs will comply with requirements identified in this chapter. The DPW Environmental Division reserves the right to direct any TAP or 90-day ASF on the USAG-HI installations to store wastes (hazardous and non-hazardous) generated on the same installation. Wastes generated from emergency situations (e.g., unplanned HM/HW releases, noncompliance with regulations, etc.) will be transported to the TAP/90-day ASF to maintain compliance with applicable regulations

d. The DPW TAP/90-day ASF manager and alternate will:

(1) Be assigned to a written job description or on appointment orders delineating specific job duties associated with the position (see appointment order format in Appendix E-2). Maintain the job description/ appointment orders on-site at the TAP/90-day ASF and provide copies to the DPW, Environ mental Division.

(2) Maintain daily operations of the TAP IAW Chapter 5 of this regulation.

(3) Ensure daily operational requirements comply with all regulatory requirements.

(4) Provide assistance necessary to store and dispose of HW.

(5) Attend the resident Environmental Compliance Officer Certification Course within 30 days of assignment to the TAP Mgr/Alt position and maintain certificates of this training on file at the TAP/90-day ASF.

(6) Attend the Annual Environmental Compliance Officer Refresher Course prior to the expiration date on their ECO identification cards and maintain certificates of this training on file at the TAP/90-day ASF.

(7) Attend a DOD approved Transportation of Hazardous Materials course. Attend refresher training every 2 years. Maintain a copy of the training certificates on file at the TAP/ 90-day ASF.

(8) Complete an initial 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Training. Attend an 8-hour Annual Refresher every year. Maintain a copy of the training certificates on file at the TAP/90-day ASF.

(9) Maintain training records on current employees until facility closure; for former employees, keep for at least 3 years from the date the employee last worked at the facility (40 CFR 265.16(e)). Maintain medical clearance statement for the TAP/90-day ASF manager and alternate on-site.

(10) Maintain records of EPA Form 8700-22, laboratory analyses, and exception reports for a period of 3 years and DRMS Form 1851 for a period of 3 years at the TAP/90-day ASF.

(11) Maintain a Site Safety and Health Plan (SSHP) for the TAPs at all USAG-HI installations. The TAP Manager or TAP Alternate Manager will ensure and document that all TAP personnel have read and understood the SSHP. The TAP Manager/Alternate TAP Manager must update the SSHP as changes occur. All TAP personnel must comply with the requirements of the SSHP.

(12) Maintain an SOP for TAP/90-day ASF operations at all installations. The TAP/90-day ASF manager and alternate will sign a certification statement, as in the format provided in Appendix G, that they have read and understand the TAP/90-day ASF HW SOP. Provide a copy of this certification statement to the DPW Environmental Division upon signature. Update this SOP annually or as changes occur.

(13) Maintain a site-specific spill contingency plan (SCP) for the TAPs at all USAG-HI installations. The TAP/90-day ASF manager and alternate will sign a certification statement (cited in the format provided in Appendix H) that they have read and understand the site-specific spill contingency plan. Provide a copy of this certification statement to the DPW, Environmental Division upon signature. The TAP/90-day ASF manager or alternate will review the plan weekly, update the plan as changes occur, and submit the SCP to all emergency response teams (Police, Fire, EMS, Area Hospitals, etc.).

(14) Maintain environmental reference publications and regulations (see the TAP/90-day ASF Management Section of the ECIC in Appendix D for required documents).

(15) Obtain and maintain Class I, II, IV and V forklift certification and maintain training certificates on file at the TAP/90-day ASF.

(16) Utilize/maintain the HMMS for the management of HW/NRW on USAG-HI installations.

(17) Enter all requests for HW/Non-regulated Waste (NRW) pickup/disposal into the HMMS upon receiving the requests.

(18) Advise activity/unit ECOs on the proper requirements for packaging, labeling, and shipping of HW/Non-RCRA waste and ensure proper transportation of these wastes conforms to Federal, State, and Army regulations.

(19) Complete all HW/Non-RCRA waste turn-in documentation as requested by USAG-HI ECOs. This documentation includes, but may not be limited to, DRMS Form 1930 (Hazardous Waste Profile Sheet), DD Form 1348-1A, EPA Form 8700-22, Uniform Hazardous Waste Manifest, and DRMS Form 1851, Land Disposal Restriction Forms (LDR), when waste is transported directly to the DRMO-HI or their designated contractor, picked up by the DRMO-HI contractor from offsite installations and processed through the installation TAP.

(20) Conduct pre-inspections of all HW/Non-RCRA waste from USAG-HI units/ activities, as requested by the unit/activity ECO, prior to the transfer of the HW/ Non-RCRA waste to the installation TAP.

(21) Identify all potentially usable materials during the pre-inspection, separate these materials from the waste items and call the HMCP to schedule an appointment with the ECO to evaluate these items for reissue in order to minimize the amount of waste generated.

(22) Properly package and transport all HW/Non-RCRA waste from USAG-HI units/activities to the installation TAPs IAW all applicable Federal, State, Army, and installation requirements.

(23) Ensure that any HW in excess of 55-gallons or 1-quart of acutely HW is transferred to the appropriate installation TAP within 72-hours of it exceeding the 55-gallon/1 quart limits.

5.2. FACILITIES.

a. Secure the TAP/90-day ASFs by a locked fence to prevent unauthorized access. In addition to a perimeter fence, consult with the military police to develop other internal security measures to discourage unauthorized access.

b. Structural requirements shall include:

(1) Adequate aisle space to allow for unobstructed movement of personnel and material handling equipment, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility in case of emergency. (40 CFR 265.35)

(2) Emergency equipment including, but not limited to, fire extinguishers, fire control equipment, spill control equipment (e.g., absorbent material), and decontamination equipment. (40 CFR 265.32(c))

(3) An internal communication or alarm system capable of providing immediate emergency instruction to facility personnel. (40 CFR 265.32(a))

(4) A telephone or a hand held two-way radio capable of summoning emergency assistance from local police or fire departments. (40 CFR 265.32(b))

(5) Water at adequate volume and pressure to supply hose streams, foam producing equipment, or automatic sprinkler systems. (40 CFR 265.32(d))

(6) A dike, berm, or wall to prevent migration of spillage and to separate incompatible wastes.

(7) Cover and physical security (e.g., roof, walls, fences, or gates).

(8) Properly bonded and grounded drums used for the accumulation of flammable liquids (e.g., paints) with stranded copper or carbon-steel cable.

c. Clearly identify the TAP/90-day ASFs with signs that read "Danger - Flammable Materials, No Smoking Within 50 Feet, Hazardous Waste Transfer and Accumulation Point (TAP)/90-day Hazardous Waste Accumulation and Storage Facility (90-day ASF), Unauthorized Personnel Keep Out." The following emergency points of contact will have phone numbers posted: TAP/90-day ASF manager and alternate, fire department, Military Police/DOD Police, DPW. Design these signs large enough to be read from 50 feet away (1-inch letters). Any deviations from these specifications require approval from the DPW Environmental Division.

d. Each TAP/90-day ASF shall have a site-specific spill contingency plan. As a minimum, the plan shall:

(1) Describe actions/procedures facility personnel must take to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden/non-sudden release of HW or HW constituents that could threaten human health or the environment.

(2) List names, addresses, and phone numbers of all persons qualified to act as emergency coordinators.

(3) List all emergency equipment (e.g., fire extinguisher, spill control equipment, communications, alarm systems, and decontamination equipment). The plan shall include the location and physical description of each item on the list and its capability.

(4) Contain an emergency evacuation plan.

5.3. SAFETY AND SPILL RESPONSE.

a. Personnel working at the TAP/90-day ASF will practice safety precautions, to include use of PPE as referenced on the MSDS of all chemicals handled at the facility.

b. The TAP/90-day ASF manager will have readily available telephone numbers of the fire department, Military Police, EMS, and the installation on-scene coordinator.

c. Maintain fire extinguishers, absorbent spill cleanup material, and communications equipment (e.g., telephone, radio, etc.) at the TAP/90-day ASF in the event of an emergency or spill.

d. The TAP/90-day ASF manager will respond to all spills and will follow spill response, containment, and cleanup procedures as contained in the TAP/90-day ASF Spill Contingency Plan. Give priority to the safety of workers and other personnel.

e. Maintain all TAP/90-day ASFs to minimize the possibility of spills, fire, and explosion. Minimize minor spills of HW to the greatest extent possible and clean up immediately. Perform daily housekeeping to police and cleanup spills.

f. The TAP/90-day ASF manager will maintain spill kits and protective equipment as per the ECIC to cleanup spills.

5.4. RECEIPT OF HW/NON-REGULATED WASTE. Prior to picking up and accepting wastes, the TAP/90-day ASF manager/alternate will:

a. Only accept HW from within the boundaries of the installation to the TAP/90-day ASF. Do not accept HW transported to the TAP/90-day ASF across State or Federal highways or from one installation to another. The TAP/90-day ASF on Schofield Barracks will accept HW from units/activities located at WAAF and the TAP/90-day ASF on Fort Shafter will accept HW from units/activities located at Fort Shafter Flats. A HW is transportable directly to the DRMO-HI or their designated contractor using an EPA licensed transporter and EPA Form 8700-22. Pre-approval from the DRMO-HI is required.

b. Pre-inspect HW/Non-regulated waste by ECO/generator request within 72 hours. The TAP/90-day ASF manager/alternate will conduct a pre-inspection of all HW/Non-regulated waste turn-in requests in order to initiate turn-in procedures. This pre-inspection must occur within 72 hours so that if the waste is in excess of 55 gallons of HW or 1 quart of acutely HW, the storage limits are not exceeded. The ECO will provide a copy of the MSDS (if available), and a completed HW or Non-Regulated Waste Collection Log at the time of the pre-inspection. The TAP/90-day ASF manager/alternate will inspect the HW/Non-Regulated waste packaging, marking, labeling to ensure that the containers are ready for transportation. If packaging materials are needed, the TAP/90-day ASF manager/alternate will provide guidance to the ECO on how to obtain the proper packaging or request the materials through the DPW Environmental Division. At the time of the pre-inspection, the TAP/90-day ASF manager/alternate will schedule a pickup date for the waste or schedule a date for a follow-up pre-inspection.

c. In cases where the HW accumulated at a HWSSP is known to exceed the 55 gallon HW/1 quart acute HW allowable limit, the generator will contact the TAP/90-day ASF manager/alternate to schedule a pre-inspection/pickup of the waste within 24 hours. If a laboratory analysis is required, the TAP/90-day ASF manager/alternate will contact the DPW work order desk and request a service order to provide laboratory testing and analysis. The TAP/alternate manager must arrange for the transfer of the waste within the 72-hour transfer period. When the laboratory analysis is received from the contractor, the TAP/90-day ASF manager/alternate will provide a copy to the generator. The TAP/90-day ASF manager/ alternate will complete documentation for final disposition of the waste.

d. Pickup the HW/Non-regulated waste from the requesting unit/activity and transfer to the appropriate TAP.

e. Pickup excess/used paint and aerosol paint cans from requesting units/activities. These paints will be evaluated for reuse/free issue. If they are determined by the TAP/90-day ASF manager/alternate that they may be reused/free issued, then the TAP will contact the HMCP and/or the DPW Free Issue center to schedule an evaluation of the paint at the TAP and transfer it to their facilities if it can be reused. If the paint cannot be reused, then the TAP/90-day ASF manager/alternate will empty them into an accumulation drum.

f. Visual container inspection.

(1) Ensure that containers used for transporting HW and non-HW are in good condition. If containers are not acceptable, the TAP/90-day ASF manager/alternate shall overpack the container into the next larger size.

(2) Ensure that the container being used will not react with, and is compatible with, the HW being stored. If containers are not compatible with wastes being disposed of, the TAP/90-day ASF manager/ alternate will repackage wastes into containers compatible with the wastes. For guidance, see the 49 CFR 172.101.

(3) Ensure containers holding HW are always closed during transportation/storage and handled in a manner that will not cause the container to rupture or leak. If containers do not meet these requirements, the TAP/90-day ASF manager/alternate shall take appropriate action (i.e., wrench tighten bungs/bolts, etc.).

(4) Ensure containers holding HW are labeled/marked describing the contents (i.e., waste solvent, waste paint, etc.) and with the words "HAZARDOUS WASTE." If not labeled properly, the TAP/90-day ASF manager/alternate will properly label or mark containers with applicable information.

d. The HW/Non-Regulated Waste Turn-In Documentation.

(1) The TAP/90-day ASF manager/alternate will complete all required documentation prior to picking up the waste from the facility.

(2) Ensure that one copy of the DRMS Form 1930 is completed with DRMO-HI guidance and Federal and State regulatory requirements and that the ECO/alternate has certified the DRMS Form 1930 by signature.

(3) Ensure that one copy of the USAG-HI Form 33,SSP/TAP/90-day ASF Hazardous Waste Collection Log (Appendix N) is completed by the ECO and provided with required TAP/90-day ASF turn-in documentation. The log will reflect the exact amount and content of the waste in the container being transported to the facility.

(4) Ensure one copy of the MSDS accompanies all wastes being turned-in to the TAP/90-day ASF. The ECO will submit the MSDS in lieu of a laboratory analysis when specific generator knowledge and exact waste stream generation is identified by the ECO. The TAP/90-day ASF manager/alternate will ensure that MSDS reflects the contents of containers.

(5) Ensure that one copy of the laboratory analysis (if necessary) accompanies all wastes being turned into the TAP/90-day ASF. Laboratory analysis is required if generator knowledge of the exact waste stream is not known. However, see subparagraph 5.4.c. for instances when the generator's 3-day transfer period is ready to expire.

(6) The ECO will complete and sign the ECO portion of the Waste Turn-in Record. The TAP/90-day ASF manager/alternate will complete the TAP portion of the waste turn-in record.

(7) The TAP/90-day ASF manager/alternate will provide the ECO with copies of all required turn-in documentation for the ECO's records.

5.5. RECEIPT OF ABANDONED/UNKNOWN HW FOUND ON THE INSTALLATION.

The TAP/90-day ASF will accept unknown HW found on the installation. Do not take unknown HW found on the installation to unit/activity SSPs. The unit/activity ECO discovering the abandoned containers will contact the TAP/90-day ASF manager/alternate to schedule a pre-

inspection and pickup of the waste. The TAP/90-day ASF manager/alternate will contact the DPW work order desk and request a service order to provide laboratory testing and analysis. The TAP/90-day ASF manager/alternate will pickup and transfer the waste to the TAP to await sampling.

5.6. RECEIPT OF SMALL QUANTITIES OF HW/NON-HW.

a. The following is a list of the types of HW that the DPW will consolidate/accept in small quantities at the TAP:

(1) Used/off specification paints.

(2) Used paint thinners.

(3) Asbestos brake shoes (packaged and sealed).

(4) Used/off specification adhesives.

(5) Used/off specification aerosol cans.

(6) Empty paint cans (crushed).

(7) Shop rags.

b. TAP personnel will pour waste paints into 55-gallon accumulation drums provided at the TAP and set empty containers resulting from waste paint consolidation in a covered, well ventilated area and leave open to solidify. Then crush containers and deposit in the collection drum at the TAP. TAP personnel will contact the Schofield Barracks (SB) Recycle Center to pick up all empty scrap metal containers.

5.7. STORAGE OF HW/NON-REGULATED WASTE AT THE TAP/90-DAY ASF.

a. The TAP/90-day ASF manager/alternate will clearly mark HW containers with the accumulation start date. If the HW transported from a HWSSP is in excess of the limits specified in subparagraph 4.3a, it will already have an accumulation start date/date container was filled marked on the container(s) by the ECO turning in the waste. The TAP/90-day ASF manager/alternate must mark the container(s) with an accumulation start date signifying the date the waste was received at the TAP/90-day ASF.

b. The TAP/90-day ASF manager/alternate will enter the appropriate information on the USAG-HI Form 27, TAP/90-day ASF Inventory Log (Appendix O).

c. Do not store HW longer than 90-days from the accumulation start date unless unforeseen, temporary, or uncontrollable circumstances occur (40 CFR 262.34(b)). If waste has not been transported from the TAP/90-day ASF for disposal within 75 days, the TAP/90-day ASF manager/alternate will notify (verbally and in writing) the DPW, HW Program Manager or one of his supervisors with details. The DPW HW Program Manager will take action to ensure transportation of the waste for disposal within the 90-day limit or, if necessary and applicable, request approval of an extension of up to 30-days from the EPA Regional Administrator.

d. Store all drums only within the containment area of the storage facility.

e. Store all containers, leaving enough space between containers for visual inspections and access for emergency response equipment.

f. Store all HWs in appropriate United Nations (UN) specification Performance-Oriented Packaging (POP) packaging as prescribed or permitted by 49 CFR 173 (unless exceptions are authorized in 49 CFR).

g. Segregate all wastes per the EPA's Chemical Compatibility Chart, EPA 600-2/80-076 at Appendix P, and place in the designated bays (e.g., corrosives, flammable, Class 9, etc.).

h. Label/mark all containers holding HW, describing the contents (e.g., waste solvent, waste paint, etc.) and with the words "HAZARDOUS WASTE."

i. Complete the USAG-HI Shop Storage Point (SSP)/TAP/90-day ASF Hazardous Waste Collection Log for all containers used for the accumulation of HW at the TAP (e.g., paint-pouring operations).

5.8. TRANSPORTING HW FROM THE TAP/90-DAY ASF TO THE DRMO-HI OR THEIR DESIGNATED CONTRACTOR.

a. Labeling Wastes. The TAP/90-day ASF manager/alternate will label all wastes per the DOT, 49 CFR 172 and the EPA, 40 CFR 262. (e.g., flammable, corrosive, class 9, etc.). Obtain appropriate labels from the General Service Administration (GSA) stores or through authorized, commercial sources using the Government Purchase Card (GPC).

b. Transportation of HW Off-island. Transportation of HW directly to an off-island HWSF or Treatment, Storage, and Disposal Facility (TSDF) is coordinated by the TAP/90-day ASF manager/alternate and accomplished through the on-site pick-up service provided from the DRMO-HI. The DRMO-HI contractor is authorized and certified to transport HW from the TAP/90-day ASF with an EPA transporter identification number.

c. Transportation of HW to DRMO-HI facilities or their designated contractor. The TAP/90-day ASF manager/alternate will arrange for transportation of HW directly to the DRMO-HI HWSF or their designated contractor. Transport is accomplished by the DOL, CULT or contractors authorized to transport HW with an EPA Transporter identification number. The TAP/90-day ASF manager/alternate shall prepare the following documents prior to shipment of HW to HWSFs:

(1) Complete DD Form 1348-1A.

(2) The TAP/90-day ASF manager/alternate will complete the DRMS Form 1851 as required per 40 CFR 268.7. The TAP/90-day ASF manager will keep a copy on-site for 3 years.

(3) The TAP/90-day ASF manager/alternate will complete the EPA Form 8700-22 per 40 CFR 262.20 and 262.

(a) Only DPW individuals with the proper training and delegation authority will sign the EPA Form 8700-22 as generator. Maintain a list of individuals/delegation authority memorandums on file at the TAP/90-day ASF.

(b) After acceptance by the transporter, the TAP/90-day ASF manager/alternate will retain the "generator" copy for a period of 3 years. The TAP/90-day ASF manager/alternate will provide a photocopy to the DPW, Environmental Division, HW Program Manager.

(c) Upon acceptance of the HW cargo, the transporter (driver) will sign and date the EPA Form 8700-22 as Transporter No. 1. The date is the actual date of movement. After arrival and acceptance at the DRMO-HI or their designated contractor, the driver will remove the Transporter No. 1 copy of the EPA Form 8700-22 and forward to the CULT or the contracted EPA licensed transporter.

(d) Once the EPA Form 8700-22 is signed and waste(s) transported off-site, the TAP/90-day ASF manager/alternate will annotate the date the waste(s) were transported off-site on the USAG-HI Form 28, TAP/90-day ASF Manifest Log (Appendix M). The TAP/90-day ASF manager/alternate will annotate dates 35 days and 45 days out from the actual transportation date.

(e) If the TAP/90-day ASF manager/alternate does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility, the TAP/90-day ASF manager/alternate must, within 35 days of the date the waste was accepted by the initial transporter, contact the transporter and/or the owner or operator of the designated facility to determine the status of the HW. The TAP/90-day ASF manager/alternate will document all phone conversations and applicable data on the USAG-HI Form 28, Manifest Log.

(f) If the TAP/90-day ASF manager/alternate has not received a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 45 days of the date the waste was accepted by the initial transporter, the TAP/90-day ASF manager/alternate must forward an exception report to the DPW, Environmental Division. The DPW, Environmental Division will provide the exception report to the EPA Regional Administrator for Region IX. The exception report will include a legible copy of the manifest for which the generator does not have confirmation of delivery and a cover letter signed by the generator or authorized representative explaining efforts taken to locate the HW and results of those efforts.

d. Special DRMO-HI Turn-in Requirements.

(1) Dispose of HW that the DRMO-HI will not accept physical custody of on-site by Service Contract through coordination with the DRMO-HI Environmental Branch and/or the DPW Environmental Division.

(2) The ECO will complete proper packaging, marking, labeling, and preparation of HW documentation prior to the DRMO-HI on-site pre-inspection.

e. Waste Unbalanced Lithium Batteries. The DRMO-HI will not physically accept unbalanced lithium batteries for disposal. The DRMO-HI will accept and process documentation for disposal of these batteries and will issue a service contract for contractor pickup of batteries on-site.

(1) Contract No. and NSN of known "unbalanced lithium batteries" are:

(a) Contract No. DAAB07-77-C-0464, NSN 6135-01-036-3495.

(b) Contract No. DAAB07-78-D-6353, NSN 6135-01-036-3495.

(c) Contract No. DAAB07-80-D-6504, NSN 6135-01-036-3495.

(2) The DD Form 1348-1A must contain the following additional information:

(a) Date of manufacturer.

(b) Contract No.

(c) Point of contact and telephone number.

(d) Appropriate Contract Line Item Number (CLIN), disposal cost per pound, and total cost.

(e) Provide the fund code (21) on the DD Form 1348-1A in columns 52 and 53.

(f) Weight per battery and total weight of container/box.

(3) Individually wrap and package each lithium battery prior to acceptance and turn in to the DRMO-HI or their designated contractor.

5.9. ADMINISTRATIVE MANAGEMENT REQUIREMENTS.

a. TAP/90-day ASF managers and alternates will be assigned to written job descriptions, to include publishing appointment orders, delineating specific job duties associated with the position (see format at Appendix E-2). Maintain the job description/appointment orders on-site at the TAP/90-day ASF and provide copies to the DPW, Environmental Division.

b. The TAP/90-day ASF manager/alternate will conduct all internal inspections with forms provided in the appendices of this document to ensure compliance.

(1) Complete the USAG-HI Form 29, Weekly/Daily TAP/90-day ASF Inspection Log on a daily and weekly basis as annotated, with dates, times and results entered accordingly. (See Appendix Q)

(a) Immediately correct any deficiencies noted and annotate the corrective actions in the remarks section of the USAG-HI Form 29, Weekly/Daily TAP/90-day ASF Inspection Log.

(b) Immediately bring any deficiencies not instantly correctable to the attention of the RCRA Program Manager or the Chief, Compliance and Pollution Prevention Division for initiation of corrective actions.

(2) Complete the USAG-HI Form 32, TAP/90-day ASF Container(s) Inspection Log (Leaking Drums) on a weekly basis (Appendix R). The log shall include inspection date, total number of drums inspected, identification numbers, and comments (i.e., satisfactory condition or, if containers are leaking, identify corrective actions taken.)

(3) Ensure all non-RCRA and HW documents are entered and managed using the HMMS HW database.

c. Record keeping Requirements.

(1) Review and Filing. The TAP/90-day ASF manager/alternate will review and maintain copies of the TAP/90-day ASF SOP, TAP/90-day ASF SSHP, and TAP/90-day ASF Spill Contingency Plan on-site at all times. The TAP/90-day ASF Spill Contingency Plan will be reviewed weekly. The TAP/90-day ASF SOP and the SSHP are reviewed on an annual basis and updates made as required.

(2) Retaining Forms. The TAP/90-day ASF manager/alternate will retain all forms listed below on-site at the TAP/90-day ASF for a period of 3 years.

(a) USAG-HI Form 33, SSP/TAP/90-DAY ASF HW Collection Log (Appendix N).

(b) The USAG-HI Form 27, TAP/90-day ASF Inventory Log (see Appendix O) to include the USAG-HI SSP/TAP/90-DAY ASF Hazardous Waste Collection Log (Appendix N).

(c) Laboratory analysis for all unknown contaminated waste containers.

(d) MSDSs supporting HW turn-in to the TAP/90-day ASF.

(e) EPA Form 8700-22.

(f) DRMS Form 1930.

(g) USAG-HI Form 28, HW Manifest Log (Appendix M).

(h) Exception Reports.

(i) DRMS Form 1851 (maintain for 3 years).

(3) Inspection Logs. The TAP/90-day ASF manager/alternate will retain copies of all inspection logs/records as listed below, on-site at the TAP/90-day ASF for a period of 3 years.

(a) The USAG-HI Form 32, Container(s) Inspection Log (Appendix R).

(b) The USAG-HI Form 29, Weekly TAP/ASF Inspection Log (Appendix Q).

d. Training.

(1) As a minimum, training for the TAP/90-day ASF manager and alternate shall consist of the following:

(a) Completion of the initial Environmental Compliance Officer Certification Course followed by the 8-hour Annual Environmental Compliance Officer Refresher Course.

(b) Completion of a DOD approved Transportation of Hazardous Materials Course followed by biennial refreshers.

(c) Completion of an initial 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Training followed by an 8-hour Annual Refresher.

(d) An annual review/revision of the SOP governing the operation of the TAP/90-day ASF.

(2) Keep training certificates in a training log per 40 CFR 265.16, for a period of 3 years from the date the employee last worked at the facility. Enter all dates and courses attended in the USAG-HI Form 34, TAP/90-day ASF Training Log (Appendix S).

e. Spill Response.

(1) The TAP/90-day ASF manager/alternate will read the TAP/90-day ASF Spill Contingency Plan and be familiar with procedures established to respond to any release of HW at the TAP/90-day ASF. The TAP/90-day ASF manager/alternate will review the TAP/90-day ASF Spill Contingency Plan on a weekly basis to ensure that it is current. Annotate any deficiencies in the plan on the USAG-HI TAP/90-day ASF Weekly/Daily Inspection Log and bring them to the attention of the Chief, Compliance and Pollution Prevention Division.

(2) Upon detection of a spill, the TAP/90-day ASF manager/alternate will immediately notify one of the following people (24-hours per day). These individuals are qualified to respond to spills or place orders with qualified contractors to respond to spills.

(a) Vincent Davis: Telephone 656-0866/Cell 864-1085 (qualified responder, SB ERTAP/FSTAP).

(b) Paul Raduziner: Telephone 656-0866/Cell 864-0937 (qualified responder, SB ERTAP/FSTAP).

(c) Keith Arakaki: Telephone 656-0866/Cell 864-1004 (qualified responder ,SB ERTAP/FSTAP).

(d) Mr. David McBride: Telephone Cell (808) 430-1038 (qualified coordinator and contract support, PTA TAP).

(e) Mr. Gary Akasaki: Telephone 656-7001/Cell 864-1001. (qualified coordinator and contract support).

(f) Mr. Jim Rice: Telephone 656-3105/Cell 864-1438 (qualified coordinators and contract support).

(3) After notifying one of the above individuals, the TAP/90-day ASF manager/alternate will initiate other procedures outlined in the appropriate section of the TAP/90-day ASF Spill Contingency Plan (SCP).

f. Medical Requirements. The TAP/90-day ASF manager/alternate will report annually to the Occupational Health Clinic, TAMC, to receive a medical baseline physical health examination. The Occupational Health Clinic will retain medical files. Copies of physician's medical clearance statements are maintained on-site at the TAP/90-day ASF and submitted to the DPW, Environmental Division.

CHAPTER 6

HAZARDOUS WASTE DISPOSAL PROCEDURES

6.1. GENERAL.

a. All HW generated on the installation is turned in to the DRMO-HI or their designated contractor for disposal. Assistance in disposing of HW is obtained from the activity ECOs. If ECOs require assistance, they may contact the TAP/90-day ASF manager/alternate or appropriate installation coordinator (see Appendix B for phone numbers).

b. The DRMO-HI will accept paper accountability and physical custody of HW and dispose of HW through private contractors. On-site pick up services of large quantities of HW are provided by the DRMO-HI disposal contractor. In these cases, the DRMO-HI accepts accountability only, and the generator would retain physical custody until pick up. Turn-in procedures shall follow current DRMO-HI guidance. (Turn-in procedures are revised periodically by the DRMO-HI.) The TAP/90-day ASF manager/alternate shall ensure that they are familiar with the DRMO-HI's most current turn-in procedures.

c. Only transporters permitted by the EPA are allowed to transport HW off the installation and across public highways. The CULT section of the DOL is a permitted transporter of HW and transports the majority of HW shipped to the DRMO-HI or their designated contractor.

6.2. REQUIREMENTS.

a. The DRMO-HI will conduct a physical inspection to ensure that all HW is properly packaged, containers are properly marked, labeled, palletized, and all turn-in documents are complete and comply with the latest DRMO-HI procedures.

b. The following are required as a minimum, prior to requesting a DRMO-HI turn-in pre-inspection:

(1) Properly label, mark, and inspect containers for acceptable condition before turn-in to the DRMO-HI or their designated contractor.

(2) Completed DD Form 1348-1A (six copies) and an EPA Form 8700-22. The EPA Form 8700-22 is required by the EPA and serves as a tracking document to ensure the HW reaches its proper destination. The DRMO-HI contractor prepares the EPA Form 8700-22 when on-site HW pick up is requested by the installation. Document numbers for EPA Form 8700-22 are furnished by the TAP/90-day ASF manager/alternate.

(3) The USAG-HI TAP/90-day ASF HW Collection Log, MSDSs, generator's knowledge, or laboratory test results are used to complete the DRMS Form 1930. Three copies of all documents are required.

(4) Three copies of the DRMS Form 1851 are required. Generators must determine if their waste is restricted from land disposal as specified in 40 CFR 268 and submit a completed DRMS Form 1851 with turn-in of these HWs. The DRMO-HI contractor prepares the DRMS Form 1851 when on-site HW pickup is requested by the installation.

6.3. THE DRMO-HI PRE-INSPECTIONS.

a. The DRMO-HI conducts HW pre-inspections.

b. Inspections are conducted on a by request basis..

6.4. TRANSPORTATION.

a. Upon completion of a satisfactory DRMO-HI inspection, activities may arrange for shipment of their HW to the DRMO-HI by coordinating with the DPW, Environmental Division (Appendix B).

b. At the time of pickup by CULT, the responsible activity (the TAP/90-day ASF manager or an ECO), along with the driver, will verify the load of HW. Upon acceptance of the cargo by the driver, the generator will sign, date, and retain the "GENERATOR COPY" of the EPA Form 8700-22. The TAP/90-day ASF manager will retain this copy until return of the completed "ORIGINAL - RETURN TO GENERATOR" copy from the DRMO-HI within 45 workdays.

c. The generators offering waste must provide the transporter with shipping placards as described by DOT (49 CFR).

d. The DRMO-HI can provide on-site pickups of HW upon direction from the installation.

6.5. FUNDING. The DPW currently programs and funds all requirements for HW testing and disposal. However, efforts to decentralize the funding program and have non-mission tenant generators pay for their own requirements are currently being analyzed. Having HW generating activities pay for testing and disposal should emphasize the importance of proper HW management and encourage minimization practices.

(IMPC-HI-PW)

DOUGLAS S. MULBURY
COL, IN
Commanding

OFFICIAL:

ROBERT M. STEPHENS, PhD.
Garrison Director of Human Resources

LIST OF ABBREVIATIONS AND ACRONYMS

AAFES	Army and Air Force Exchange Service
ADBM	Application Data Base Manager
ACOFS	Assistant Chief of Staff
AECO	Alternate Environmental Compliance Officer
AR	Army Regulation (or Regulations ~ plural)
ASD	Accumulation Start Date
ASF	Accumulation and Storage Facility
ASP	Ammunition Supply Point
AST	Above Ground Storage Tank
AUL	Authorized Use List
AVN	Aviation
BDE	Brigade
BN	Battalion
CDD	Complete Discharge Device
CDE	Chemical Defense Equipment
CD-ROM	Compact Disk – Read Only Memory
CELL	Cellular (Telephone)
CESQG	Conditionally Exempt Small Quantity Generator
CFR	Code of Federal Regulations
CLIN	Contract Line Item Number
COR	Contracting Officer's Representative
CSU	Colorado State University
CULT	Common Use Land Transport
DA	Department of the Army
DD	Defense Department
dd mmm yy	Day ~ Month ~ Year
DES	Directorate of Emergency Services
DFMWR	Directorate of Family, Morale, Welfare, and Recreation
DOD	Department of Defense
DOH	Department of Health
DOL	Directorate of Logistics
DOT	Department of Transportation
DPTMS	Directorate of Plans, Training, Mobilization, and Security
DPW	Directorate of Public Works
DRMO	Defense Reutilization and Marketing Organization
DRMO-HI	Defense Reutilization and Marketing Organization - Hawaii
DRMS	Defense Reutilization and Marketing Service
DTID	Disposal Turn-in Document
ECIC	Environmental Compliance Inspection Checklist
ECO	Environmental Compliance Officer
EMS	Emergency Medical Services
EPA	Environmental Protection Agency
EQCC	Environmental Quality Control Committee
ER	East Range
etc.	*Etcetera* (meaning: "and other unspecified things of the same class" and "so forth")
FFCA	Federal Facility Compliance Act

FGS	Final Governing Standard(s)
FRH	Flameless Ration Heater
GC	Garrison Commander
GPC	Government Purchase Card
GSA	Government Services Administration
HAR	Hawaii Administrative rules
HAZCOM	Hazardous Communication(s)
HAZMAT	Hazardous Materials
HAZMIN	Hazardous Waste Minimization
HAZWOPER	Hazardous Waste Operations and Emergency Response
HDOH	Hawaii Department of Health
HED	Honolulu Engineer District
HIANG	Hawaii Air National Guard
HIRANG	Hawaii Army National Guard
HM	Hazardous Materials
HMCP	Hazardous Materials Control Point
HMMS	Hazardous Materials Management System
HMR	Helemano Military Reservation
HSMS	Hazardous Substance Management System
HW	Hazardous Waste
HWSF	Hazardous Waste Storage Facility
HWSSP	Hazardous Waste Shop Storage Point(s)
IAW	In Accordance With
ID	Infantry Division (or Identification)
IG	Inspector General
IHWMP	Installation Hazardous Waste Management Plan
ISO	Installation Safety Office
JP-8	Jet Propellant (grade 8)
KMC	Kilauea Military Camp
LDR	Land Disposal Restriction
mm	Millimeter
MEDCOM	Medical Command
MEK	Methyl Ethyl Ketone
MMR	Makua Military Reservation
MOGAS	Motor Gasoline
MP	Military Police
MRE	Meal, Ready to Eat
MSDS	Material Safety Data Sheet
MWR	Morale, Welfare and Recreation
NLT	No (Not) Later Than
NRW	Non-Regulated Waste
NSN	National Stock Number
OSHA	Occupational safety and health Administration
OWS	Oil Water Separator
PAM or Pam	Pamphlet
PARC	Pilila'au Army Recreational Center
PCB	Polychlorinated Biphenyls
pH	Properties of Hydrogen
POL	Petroleum Oil Lubricants
POP	Performance-Oriented Packaging

PPE	Personal Protective Equipment
PTA	Pohakuloa Training Area.
QASAS	Quality Assurance Specialist Ammunition Surveillance
RAR	Rapid Action Revision
RCRA	Resource Conservation and Recovery Act
RMSSP	Recyclable Materials Shop Storage Point
RSC	Reserve Support Command
SB or Scho Bks	Schofield Barracks
SCP	Spill Contingency Plan
SF	Standard Form
SJA	Staff Judge Advocate
SLECT	Senior Leader Environmental Compliance Training
SOP	Standard Operating Procedure
SPCCP	Spill Prevention, Control and Countermeasures Plan
SSHP	Site Safety and health Plan
SSP	Shop Storage Point
STB	Special Troops Battalion
STC	Single Trip Containers
SUS BDE	Sustainment Brigade
TAMC	Tripler Army Medical Center
TAP	Transfer Accumulation Point
TCE	Trichloroethylene
TCLP	Toxic Characteristic Leaching Procedure
TEL or Tel	Telephone
TSC	Theater Sustainment Command
TSDF	Treatment Storage and Disposal Facility
UCMJ	Uniform Code of Military Justice
UN	United Nations
US or U.S.	United States
UHWM	Uniform Hazardous Waste Manifest
USACE	United States Army Corps of Engineers
USAG-HI	United States Army Garrison, Hawaii
USARPAC	United States Army, Pacific
USMC	United States Marine Corps
UW	Universal Waste
WAAF	Wheeler Army Airfield
WWM	Waste Military Munitions

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LIST OF PRESCRIBED, COMMAND FORMS

This Regulation prescribes the use of the following USAG-HI command forms in support of this regulation, the Installation Hazardous Waste Management Plan (IHWMP).

a. USAG-HI Form 27, TAP Inventory Log, Oct 08 (Appendix O).

b. USAG-HI Form 28, Manifest Log, Nov 08 (Appendix M).

c. USAG-HI Form 29, Weekly TAP/90-Day Inspection Log, Oct 08 (Appendix Q).

d. USAG-HI Form 30, Environmental Compliance Inspection Checklist, Jun 10 (Appendix D).

e. USAG-HI Form 31, Recyclable Material Shop Storage Point (RMSSP)/Recyclable Material/Non-Regulated Waste Collection Log, Oct 08 (Appendix X)

f. USAG-HI Form 32, Container(s) Inspection Log, Oct 08 (Appendix R).

g. USAG-HI Form 33, SSP/TAP/90-Day ASF Hazardous Waste Collection Log, Oct 08 (Appendix N).

h. USAG-HI Form 34, TAP/90-Day ASF Training Log, Apr 10 (Appendix S).

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APPENDIX A

REFERENCES

1. 29 CFR, Labor, Part 1910.1200, Hazard Communications, 1 Jul 09.

2. 40 CFR, Protection of Environment, Chapter 1 Environmental Protection Agency, Parts 260 thru 282, 1 Jul 09.

3. 49 CFR, Transportation, Subtitle B (Other Regulations Relating to Transportation), Parts 171 thru 179, 1 Oct 08.

4. Hawaii Department of Health, Solid and Hazardous Waste Branch: Hawaii Administrative Rules, Title 11, Chapters 260 to 271 (20 Sep 99); Chapters 273 & 279 (13 Mar 99); Chapter 280 (18 Jun 94); Chapter 281 (28 Jan 00)**

5. DOD 4160.21-M, Defense Material Disposition Manual, 18 Aug 97 (Chapter X, Environmentally Regulated and Hazardous Property)

6. AR 25-50, Preparing and Managing Correspondence, 3 Jun 02

7. AR 200-1, Environmental Protection and Enhancement, 13 Dec 27.

8. AR 385-10, The Army Safety Program, 23 Aug 07 with Rapid Action Revision issued 14 Jun 10.

9. AR 420-1, Army Facilities Management, 12 Feb 08 (Rapid Action Revision (RAR) 001, 28 Mar 09).

10. TB 43-0135, Battery Disposal and Disposition, 19 May 08.

11. Policy Memorandum USAG-HI-4, Environmental Compliance and Protection Program, 29 Jul 10.

12. Policy Memorandum USAG-HI-10, Environmental Policy, 27 Jul 10.

13. Policy Memorandum USAG-HI-19, Authorized Use List (AUL), 22 Jan 08.

** As of 3 Mar 10, all chapters cited were "Pending Amendment and Compilation..." by the Hawaii State Department of Health, Solid and Hazardous Waste Branch.

APPENDIX B

POINTS OF CONTACT

PROGRAM	TITLE	ACTIVITY	PHONE
Environmental Division	Administrative Assistant	DPW Environmental Division	656-2878
Environmental Division	Chief	DPW, Environmental Division	656-5790
Compliance/Pollution Prevention	Chief	DPW, Environmental Division Compliance/Pollution Prevention Branch	656-5301
Hazardous Waste	Hazardous Waste Program Manager	DPW, Environmental Division	656-7001
Environmental Training	Chief Instructor	DPW, Environmental Division	655-0584
Environmental Compliance Inspections	Chief Inspector	DPW, Environmental Division, Colorado State University (CSU)- Center for Environmental Management of Military Lands (CEMML)	656-3088
Clean Water Act (Wash Rack, OWS, Storm Water)	CWA Program Manager	DPW, Environmental Division	656-3105
Lead Paint/Asbestos	Program Manager	DPW, Environmental Division	656-5301
Recycling, Solid Waste, Pollution Prevention	Program Manager	DPW, Environmental Division	656-5411
Installation Restoration Program, UST, AST	Program Manager	DPW, Environmental Division	656-3106
Authorized Use List, HMMS, EPCRA	Application Data Base Manager (ADBM)	DOL	656-1308
Clean Air Act (CAA)	CAA Program Manager	DPW, Environmental Division	656-5301
Contracting Officer Representative, Used POL Pickup, Parts Washers	Contract Performance Evaluator/Contracting Officer's Representative (COR)	DPW, Contracts Branch	656-2440
Hazardous Material Control Point (HMCP), Hazardous Material (HAZMAT) Turn-in	HMCP Manager	BAE/DOL Hazardous Material Control Center	656-0720
Hazardous Waste Pickup	Transfer Accumulation Point (TAP) Manager	DPW, Environmental Division	656-0866

APPENDIX C

HW/NRW STREAMS ON USAG-HI INSTALLATIONS

Waste stream	Hazardous Material Used	Description of process generating waste	Description of Waste	Lab analysis #	Waste Characterization/ EPA Waste Code	Waste management procedures
Alcohol Rags	Alcohol	AVN MAINT: cleaning dirt, POL and grease off of parts	Cadmium from the corrosion protective coating of the aircraft	SB6040-7302-002 SB6040-7302-003	HAZARDOUS WASTE D006	Used alcohol rags are collected in a closable metal container in the maintenance bay labeled "USED ALCOHOL RAGS" for reuse. Rags that are no longer usable are placed into a 55 gallon collection drum in the HWSSP labeled HAZARDOUS WASTE AVIATION MAINTENANCE RAGS".
Alodine rags	Alodine	AVN MAINT: apply alodine to aircraft after repainting	Chromium residue from chromic acid	ER 6040-8245-03	HAZARDOUS WASTE D006	Used alodine rags are collected in a closable metal container in the maintenance bay labeled "USED ALODINE RAGS" for reuse. Rags that are no longer usable are placed into a plastic 55 gallon collection drum in the HWSSP labeled HAZARDOUS WASTE ALODINE RAGS".
Acetone Rags	Acetone	AVN MAINT: Acetone is used to soak blade pins to remove graphite coating. Acetone is wiped off with rags.	Acetone is an F-listed solvent.	MSDS	HAZARDOUS WASTE F003	Used acetone rags are collected in a closable metal container in the maintenance bay labeled "USED ACETONE RAGS" for reuse. Rags that are no longer usable are placed into a 55 gallon collection drum in the HWSSP labeled HAZARDOUS WASTE AVIATION MAINTENANCE RAGS".
Toluene Rags	Toluene	AVN MAINT:	Toluene is an F-listed solvent.	MSDS	HAZARDOUS WASTE F005	Used toluene rags are collected in a closable metal container in the maintenance bay labeled "USED TOLUENE RAGS" for reuse. Rags that are no longer usable are placed into a 55 gallon collection drum in the HWSSP labeled HAZARDOUS WASTE AVIATION MAINTENANCE RAGS".
POL Rags	POL	AIRCRAFT & VEHICLE MAINT: Rags used to wipe off excess POL from parts	Oily Rags	ER 6040-8352-03	NON-RCRA/NON-REGULATED WASTE	Used POL Rags are collected in a closable metal container in the maintenance bay labeled "USED POL RAGS" for reuse. Rags that are no longer usable are placed into a 55 gallon collection drum in the RMSSP labeled "USED POL RAGS ".
Aviation Paint Rags	Paint	AVN MAINT: Rags used to wipe off excess paint.	Wet paint on rags is flammable and contains Chromium.	SB6040-7302-004	HAZARDOUS WASTE D001, D007	Used paint rags are collected in a closable metal container in the maintenance bay labeled "USED PAINT RAGS" for reuse. Rags that are no longer usable are placed into a 55 gallon collection drum in the HWSSP labeled HAZARDOUS WASTE

						PAINT RAGS".
Alodine Rinse Water	Alodine	AVN MAINT: Aircraft is rinsed with water at the wash rack after alodine is applied following the depainting process.	Rinse water is mildly corrosive and has trace amounts of chromium from the chromic acid in the alodine.	SB6040-7302-001 SB6040-7324-002	HAZARDOUS WASTE D007	Alodine is applied at the wash rack with the approval of DPW Environmental Division. The drains are plugged during the process. The alodine is applied to the unpainted surface to be treated for 1-3 minutes, then rinsed with water to stop the treatment process. The rinse water collects in the wash rack containment area where it is pumped into 55 gallon poly drums labeled "HAZARDOUS WASTE ALODINE RINSE WATER" with a class 9 label. The drums are stored in the HWSSP next to the wash rack until they are transferred to the ER TAP.
Sodium Bicarbonate	Sodium Bicarbonate	AVN MAINT: Sodium Bicarbonate is used as media in media blast depainting process	Sodium bicarbonate mixed with paint dust	SB6040-7324-001	NON-RCRA/NON-REGULATED WASTE	Managed as NRW IAW IHWMP
Exhaust Air filters from AVN paint booth	N/A	AVN MAINT: Filters for paint booth exhaust	Paint overspray contains Chromium	SB6040-8008-004	HAZARDOUS WASTE D007	Managed as HW IAW IHWMP
Oily Rags with Paint Dust	N/A	AVN MAINT: Rags used to wipe aircraft before and after depainting	Oily rags with dry paint dust	SB6040-7346-003	NON-RCRA/NON-REGULATED WASTE	Managed as NRW IAW IHWMP
Paint dust from HEPA-vac bag	N/A	AVN MAINT: Vacuum bags used on HEPA -vac tools	Paint dust and chips from sanding and grinding operations.	SB6040-7346-004	NON-RCRA/NON-REGULATED WASTE	Managed as NRW IAW IHWMP
Waste Paint and thinner	Paint and thinner	AVN MAINT: Excess paint is generated from left over 2 part paint mixing operations. When paint operators change colors they need to purge and clean out the spray guns with thinner which is also accumulated with the waste paint.	Paint contains Chromium. Thinner is flammable.	MSDS	HAZARDOUS WASTE D001, D007	Managed as HW IAW IHWMP

Exhaust Filters from Sodium Bicarbonate Blasting of aircraft rotor blades	Sodium Bicarbonate	AVN Painting Process	Sodium Bicarbonate blast media and paint debris	SB6040-8008-005	NON-RCRA/NON-REGULATED WASTE	Managed as NRW IAW IHWMP
AVN Paint Rags with thinner	Paint and thinner	AVN Painting Process		SB6040-7302-004 MSDS # BNWVM, #BJZSK	HAZARDOUS WASTE D007, F003, F005	Managed as HW IAW IHWMP
Gas Path Effluent from UH-60	Gas Path Cleaner	Cleaning turbine fuel lines	Gas path cleaner is a liquid that is run through the fuel lines	W1020-1187-01	NRW	Gas path cleaning is done on a wash rack with an OWS. It is run through the fuel lines and allowed to drain onto the wash rack and into the OWS
Gas Path Effluent from OH-58	Gas Path Cleaner	Cleaning turbine fuel lines	Gas path cleaner is a liquid that is run through the fuel lines	W112-1187-01	NRW	Gas path cleaning is done on a wash rack with an OWS. It is run through the fuel lines and allowed to drain onto the wash rack and into the OWS
Burn ash residue from excess 155mm propellant bags	Excess propellant bags	Burning of excess propellant bags as part of training	Propellant residue	SBareaX-1211-04	NRW	Managed as NRW IAW IHWMP
Burn ash residue from excess 105mm propellant bags	Excess propellant bags	Burning of excess propellant bags as part of training	Propellant residue	SBareaX-1211-02	D008	Managed by DPTM Range Control. Residue is certified and verified as inert by QASAS. Training unit cleans burn pan and deposits residue into drum at HWSSP marked HAZARDOUS WASTE under direction of Range Control ECO.
Burn ash residue from excess 81mm propellant bags	Excess propellant bags	Burning of excess propellant bags as part of training	Propellant residue	SBareaX-1211-03	D008	Managed by DPTM Range Control. Residue is certified and verified as inert by QASAS. Training unit cleans burn pan and deposits residue into drum at HWSSP marked HAZARDOUS WASTE under direction of Range Control ECO.
Burn ash residue from excess 60mm propellant bags	Excess propellant bags	Burning of excess propellant bags as part of training	Propellant residue	SBareaX-1211-01	D003, D008	Managed by DPTM Range Control. Residue is certified and verified as inert by QASAS. Training unit cleans burn pan and deposits residue into drum at HWSSP marked HAZARDOUS WASTE under direction of Range Control ECO.
Water based CARC paint rinse water from BAE Paint booth	CARC paint	Cleaning spray paint guns	Rinse water	ER 6040-9034-06	NRW	Managed as NRW IAW IHWMP
AVN Paint Booth scouring pads with Pasa-Jell	Pasa-Jell	Depainting process	Used scouring pads	ER-6040-9034-04	HAZARDOUS WASTE D007	Managed as HW IAW IHWMP

AVN Paint Booth Rags with Formula 815 GD and water	Formula 815 GD and water	Painting process	Used rags	ER 6040-9034-03	NRW	Managed as NRW IAW IHWMP
Used "Breakthrough" weapons cleaning solvent from IT48WC	Breakthrough	Weapons cleaning	Used solvent	ER6040-8328-03	NRW	Managed as NRW IAW IHWMP
Used "Edge-Tek" filter from IT48WC weapons cleaning tank	"Edge-Tek" filter from IT48WC and solvent residue	Weapons cleaning	Used filter	ER6040-8328-04	HAZARDOUS WASTE D001, D008	Managed as HW IAW IHWMP
BAE Paint Booth used Kleen Strip spray gun tip cleaner	Kleen Strip	Cleaning spray gun tips	Used solvent	SB6040-8008-002	HAZARDOUS WASTE D001	Managed as HW IAW IHWMP
BAE Paint Booth used mop water	n/a	Cleaning paint booth after painting process	Mop water	SB6040-7144-006	NRW	Managed as NRW IAW IHWMP
BAE Paint Booth paint chips and dust.	CARC paint	Cleaning paint booth after painting process	Paint chips and dust	SB6040-6038-003	NRW	Managed as NRW IAW IHWMP
BAE Paint Booth PPE	PPE	Vehicle/equipment painting	Used PPE suits, gloves	SB6040-7144-008	NRW	Managed as NRW IAW IHWMP
BAE Paint Booth paper and filters	Paint	Vehicle/equipment painting	Used cover paper and exhaust filters	SB6040-7250-002	NRW	Managed as NRW IAW IHWMP
BAE Paint Booth used primer brushes	Primer	Vehicle/equipment painting	Used brushes	SB6040-6010-002	NRW	Managed as NRW IAW IHWMP
Used POL and coolant (Engine oil, Gear oil, Brake fluid, Hydraulic Fluid, Transmission fluid, JP-8, Diesel, Antifreeze/Coolant, Synthetic oil)	POL products (Engine oil, Gear oil, Brake fluid, Hydraulic Fluid, Transmission fluid, JP-8, Diesel, Antifreeze/Coolant, Synthetic oil)	Vehicle, aircraft and equipment maintenance	Used POL and coolant	MSDS	NRW (recycled)	Managed as NRW/Recyclable material IAW IHWMP

LiSO2, LiMnO2, Lithium Thionyl Chloride, Magnesium, NiCd, NiMH batteries	n/a	Batteries are used to power tactical and non-tactical equipment	Used batteries	MSDS	UW	Managed as UW IAW IHWMP
C2A1 Canisters	C2A1 Canisters	NBC/CBRNE protection	Training, expired	MSDS	HW, D00	Managed as HW IAW IHWMP
M256A1 decon kits	M256A1 decon kits		Training, MSDS	MSDS	HW D001	Managed as HW IAW IHWMP
Lead-Acid batteries	Lead-Acid batteries	Vehicle/equipment maintenance	Used batteries	MSDS	NRW (recycled)	Lead-acid batteries are turned-in to an approved recycling contractor.
UW Lamps	Fluorescent lamps, High pressure sodium lamps, etc	Building maintenance	Used lamps	MSDS	UW	Managed as UW IAW the IHWMP
POL contaminated rags from ground vehicles and equipment	POL products (engine oil, gear oil, hydraulic fluid, JP-8, transmission fluid, brake fluid	Vehicle/equipment maintenance	Used rags	MSDS	NRW	Managed as NRW IAW the IHWMP
POL contaminated dry sweep from ground vehicle and equipment maintenance	POL products (engine oil, gear oil, hydraulic fluid, JP-8, transmission fluid, brake fluid	Vehicle/equipment maintenance	Used dry sweep	MSDS	NRW	Managed as NRW IAW the IHWMP

APPENDIX D

USAG-HI Form 30, Environmental Compliance Inspection Checklist June 2010

USAG-HI Form 30, Environmental Compliance Inspection Checklist is included in this Appendix D in its approved, published format. Users should remove it for environmental inspections or preparation for the same.

Unit/Activity Name: Inspector: Date:

A. Environmental Program Management

			YES	NO	N/A	Comments	Citation
1	★	Is the U.S. Army Hawaii Environmental Policy posted in a visible location?	☐	☐	☐		**USAG-HI-10, 6.** *Copies of the Environmental Policy will be posted in shops, work areas, unit bulletins, and on all official bulletin boards as appropriate.*
2	★	Are current copies of the Primary and Alternate ECO's appointment orders, initial ECO training certificate and annual ECO refresher training certificate available for inspection?	☐	☐	☐		**USAG-HI-4, 3.b.** *Subordinate Commanders, Directors, and tenant activities will appoint one primary and one alternate ECO from brigade level down to the company level or equivalent. It is essential that "key" personnel are appointed and sent to the ECO Course.*
3		Have the unit/activity senior leaders attended the Senior Leaders Environmental Compliance Training (SLECT) course within 120 days of Assignment to their position?	☐	☐	☐		**USAG-HI-4, 3.c.** *Each senior leader with environmental compliance responsibilities in platoon level and above leadership positions, brigade/battalion/company executive officers, S-4s, logistics officers and civilians in supervisory positions will attend SLECT within 120 days of assuming these positions.*
4	★	Have the primary and/or the alternate ECO conducted and documented quarterly internal environmental compliance training ?	☐	☐	☐		**29 CFR 1910.1200 (e), USAG-HI-200-4.** *The ECO and alternate must conduct and document quarterly internal training in the following areas: Hazard Communication Program, HM/HW Management, HW Minimization, Spill Contingency Procedures, AST/UST, OWS.*
5		Does the unit maintain historic HW documentation for a period of 3 years for the following:					**USAG-HI-200-4,3.8.a.** All waste turn-in documentation must be kept on file for three years.
5.a.	★	HW Manifest(EPA 8700-22 rev)	☐	☐	☐		**40 CFR 262.40(a), USAG-HI-200-4,3.8.a.(1).** The HW Manifest is required only for units/activities located on installations that do not have a DPW TAP (e.g. AMR, MMR, KMC, etc.)
5.b.	★	DRMS Form 1851 (LDR)	☐	☐	☐		**40 CFR 268.7(a)(8).USAG-HI-200-4,3.8.b.** The LDR is required only for units/activities located on installations that do not have a DPW TAP (e.g. AMR, MMR, KMC, etc.)
5.c.	★	The DTID (DD Form 1348-1) (IHWMP)	☐	☐	☐		**USAG-HI-200-4,3.8.a.(2)**
5.d.	★	HW Profile Sheet(DRMS Form 1930)	☐	☐	☐		**USAG-HI-200-4,3.8.a.(3)**
5.e.	★	Laboratory analyses and MSDSs	☐	☐	☐		**USAG-HI-200-4,3.8.a.(4)**
5.f.	★	USAG-HI Form 33, SSP/TAP/90-day ASF Hazardous Waste Collection Log, Oct 08	☐	☐	☐		**USAG-HI-200-4,3.8.a.(5)**

A. Environmental Program Management			YES	NO	N/A	Comments	Citation
5.g.		Non-Hazardous Waste Manifests/contractor receipts (for RMSSP/OWS)	☐	☐	☐		**USAG-HI-200-4,3.8.c.**
6	★	Has the unit/activity or its higher headquarters sent an ECO update memorandum to the DPW Environmental Division each month since the last inspection?	☐	☐	☐		**USAG-HI-200-4, 1.6.f.(6).** *The Brigade ECO will forward a consolidated list of ECOs to the DPW Environmental Division...Chief Inspector no later than the 15th of each month. A copy of this update must be kept in the unit/activity's records.*
7	★	Does the unit have a current (updated annually or as changes occur) HM/HW standing operating procedure (SOP) and Spill Contingency Plan (SCP)?	☐	☐	☐		**USAG-HI-200-4,1.6.f.(6).**The ECO must develop a site-specific HM/HW SOP. (A sample SOP is available on the ECO website.)
8		Have the Primary and Alternate ECOs signed a certification statement that they have read and understand the unit/activity HM/HW SOP and SCP?	☐	☐	☐		**USAG-HI-200-4,1.6.f.(7).** A sample certification statement is available on the ECO website.
9		Does the unit/activity have readily available current (printed or electronic) copies of the following environmental documents and have the old, obsolete documents been removed?					
9.a.		AR 200-1, Environmental Protection and Enhancement?	☐	☐	☐		**USAG-HI-200-4, 1.6.g.(20)(a)-(e).** Copies of these documents must be maintained on the ECO CD in the ECP Book. The most current copies of these documents are available on the ECO website. The ECP Book is furnished by the DPW Environmental Division and maintained by the unit/activity ECOs. The ECP Book should be turned in to the DPW Inspectors before deployment and picked up when the unit returns.
9.b.		AR 420-1, Army Facilities Management?	☐	☐	☐		
9.c.		The USAG-HI, Spill Prevention, Control and Countermeasures (SPCC) Plan?	☐	☐	☐		
9.d.		The Installation Hazardous Waste Management Plan (IHWMP)?	☐	☐	☐		
9.e.		The Environmental Compliance Program Book?	☐	☐	☐		
10		Does the unit/activity have a current diagram of the area(s) where HMs/HWs are stored?	☐	☐	☐		**USAG-HI-200-4, 1.6.f.(14).** The diagram will show the following locations: the Hazardous Material Storage Points, RMSSP, HWSSP (must include an HWSSP evacuation route which must be posted at the HWSSP), and Universal Waste Storage Point.
11	★	Are monthly and weekly inspections conducted (and documented) using all applicable sections of the Environmental Compliance Inspection Checklist?	☐	☐	☐		**USAG-HI-200-4, 1.6.g.(8).** *Conduct and document monthly (and weekly HWSSP) internal compliance inspections using all applicable sections of the ECIC.*
12	★	Is the use of "listed" solvents, such as acetone, MEK, toluene or 1,1,1-trichloroethane justified by a technical manual or other authorized documentation?	☐	☐	☐		**USAG-HI-200-4 ,1.1.b.(2)-(3).** *For degreasing/cleaning operations, units/activities must use the Government solvent recycling service as a substitute for solvents regulated as HWs. If this is not possible, then the Technical Manual that calls for the HM or other authorized documentation shall be provided by the unit commander indicating that there is no substitute.*
13	★	Is the unit/activity free of all serious deficiencies other than those listed on this checklist? (if "No", describe in detail in the Comments section)	☐	☐	☐		**USAG-HI-200-4, 4.1.a.**

B. Hazardous Material Management

			YES	NO	N/A	Comments	Citation
1	★	Does the unit/activity have an approved Authorized Use List (AUL)?	☐	☐	☐		**USAG-HI-19, 3.a.** *All units down to the company level, are required to identify all HM necessary to meet daily mission requirements through their AUL. The AUL, which reflects a 30-day HM supply, shall be based upon the unit's basic load (UBL) and shall be approved by the Company Cmdr's signature.*
2	★	Are all Hazardous Materials (HM) authorized and documented on the unit/activity AUL?	☐	☐	☐		
3		Are all HMs bar-coded in accordance with HMCP guidelines? (HMCP SOP)	☐	☐	☐		**USAG-HI -19, 3.d.** *All HM stored on USAG-HI installations must be labeled with the HMMS bar code.*
4		Has the annual HM inventory been submitted to the DPW Environmental Division EPCRA Manager NLT 31 January?	☐	☐	☐		**USAG-HI -19, 3.a.** *AULs, along with a current on-hand inventory, must be submitted to the DPW Env Div...NLT 31 Jan of each year.*
5		Are inventories of HMs within the quantities of the unit/activity AUL?	☐	☐	☐		**USAG-HI-19 ,3.a.** *Units are permitted to store only up to the amount of HM designated on their AUL at their facilities.*
6		Do MSDSs cover all materials being stored and are they available in a visible location inside all HM storage areas ?	☐	☐	☐		**29 CFR 1910.1200(b)(4)(ii), USAG-HI 200-4,1.6.f(21).** *The ECO and alternate will maintain Material Safety Data Sheets (MSDS) on-site for all HM utilized, stored, received, or shipped.*
7		Are incompatible HMs properly segregated (e.g. oxidizers segregated from flammables and acids segregated from bases)?	☐	☐	☐		**NFPA-1, UFC 80.301(n), 29 CFR 1910.106, USAG-HI SPCCP 2.3.2.8.** *All materials shall be stored neatly, and segregation storage requirements for incompatible and flammable products shall be followed. ECOs should contact the installation Safety Office or DPW-ED for any questions about storage incompatibilities.*
8		Are all "flammable" HMs stored in approved "flammable" storage cabinets?	☐	☐	☐		
9	★	Are all HM containers properly marked/labeled for identification?	☐	☐	☐		**29 CFR 1910.1200(f)(5).** *...the employer shall ensure that each container of hazardous chemicals in the workplace is labeled, tagged or marked with the following information...Identity of the hazardous chemical(s) contained therein; and,...Appropriate hazard warnings...*
10		Are all hazardous material product containers in good condition?	☐	☐	☐		**29 CFR 1910, Subpart H.**
11		Are damaged/leaking HMs over-packed or transferred to a good container?	☐	☐	☐		
12		Are expired/excess HMs promptly turned-in to the HMCP or TAP?	☐	☐	☐		**USAG-HI-200-4,1.6.f(13)h.** Ensure products are absolutely required; promptly and properly turn-in excess hazardous materials.
13		Are containers of new material that are stored outside covered to prevent accumulation of rainwater on the containers or in containment pallets?	☐	☐	☐		**USAG-HI SWPPP, BMP 16.** *the ECO shall verify that POL and other significant liquid materials are not stored in areas or containers exposed to storm water.*

B. Hazardous Material Management					N/A	Comments	Citation
14		Do all HM storage areas have secondary containment capable of preventing spills into the environment?	☐	☐	☐		**USAG-HI-SPCCP, 2.2.3.1.** *USAG-HI policy is that all containers of POL and hazardous substances will be provided secondary containment, capable of containing the entire contents of the largest container or 10% of the total volume of all containers, whichever is greater.*
15		Is a spill kit available and contain adequate supplies to respond to a spill or release of the HM stored at the facility?	☐	☐	☐		**USAG-HI-200-4,1.6.f(13)d.** Spill kits should contain, at a minimum: (1) Granular absorbent (50 pounds) (2) Absorbent pillows (5 ea) or pads (bundle of 100) (3) Straight edge, non-sparking shovel or dustpan (1 ea) (4) Broom (1 ea) (5) Used dry sweep container with lid (1 ea) (6) Rubber gloves (2 pair) (7) Rubber boots (2 pair) (8) Absorbent booms, 8 or 10 feet long (2 ea)
16	★	Has all HW been properly identified and managed IAW the IHWMP?	☐	☐	☐		**USAG-HI-200-4,4.1.a**

Unit/Activity Name: Inspector: Date

C1. Hazardous Waste Shop Storage Point (HWSSP) Management (Weekly Requirement)

			YES	NO	N/A	Comments	Citation
1		Is the HWSSP free of severe structural deterioration?	☐	☐	☐		**USAG-HI-200-4,4.2.b**
2		Is there a warning sign designating the area as a HWSSP?	☐	☐	☐		**USAG-HI-200-4,4.2.c.** HWSSP signs are provided by the DPW Environmental Division.
3		Are signs stating "No Smoking Within 50 Feet" posted in locations where they are visible from all approachables sides?	☐	☐	☐		
4		Does the structure have secondary containment capable of preventing spills into the environment?	☐	☐	☐		**USAG-HI-200-4,4.1.a**
5		Is there a telephone (or other authorized communication device) in working order and easily accessible?	☐	☐	☐		**40 CFR 265.32(b)**
6		Are the emergency notification personnel and activity phone numbers posted in a visible location at the HWSSP?	☐	☐	☐		**40 CFR 262.40(a), USAG-HI-200-4,4.2.c.** *The following emergency points of contact will have phone numbers posted: ECO and alternate, fire department, Military Police/DOD Police, DPW. Design these signs large enough to read from 50 feet away (1-inch letters).*
7		Is a fire extinguisher readily accessible that is fully charged, sealed and compatible for the waste being stored?	☐	☐	☐		**40 CFR 265.32(c)**
8		Is a spill kit available and does it contain adequate supplies to respond to a spill or release of the waste being stored at the HWSSP?	☐	☐	☐		**USAG-HI-200-4,4.2.e.** Spill kits should contain, at a minimum: Granular absorbent (50 pounds), Absorbent pillows (5 ea) or pads (bundle of 100), Straight edge, non-sparking shovel or dustpan (1 ea), Empty over-pack drum to accommodate largest container(e.g., 30 gal over-pack for 15 gal drum) (1), Broom (1), Rubber gloves (2 pair), Rubber apron (2), Rubber boots (2 pair), Goggles (2 pair), Absorbent booms, 8 or 10 feet long (2)
9	★	Is there no unauthorized waste stored inside the HWSSP?	☐	☐	☐		**40 CFR 262.34(c)(1), USAG-HI-200-4,4.2.a.** The HWSSP must be established at or near the point of generation and must be under the control of the unit/activity generating the waste to ensure that no unauthorized waste is placed inside.
10	★	Does the Primary/Alternate ECO maintain security and accessibility to the HWSSP?	☐	☐	☐		
11		Is the HWSSP evacuation route posted in a visible location?	☐	☐	☐		**USAG-HI-200-4,1.6.f(14)c.**

NOTE: If HW is present inside the HWSSP, proceed with section C2. If there is no HW currently stored inside the HWSSP, the following section C2 questions do not apply.

MARK THIS BLOCK IF THERE IS NO HW CURRENTLY STORED INSIDE THE HWSSP: ☐

C2. Hazardous Waste Management

			YES	NO	N/A	Comments	Citation
1		Are copies of MSDSs/laboratory analyses for all HW present kept inside the HWSSP and in an alternate location other than the HWSSP for spill response (i.e., an office in the motorpool)?	☐	☐	☐		**USAG-HI-200-4,4.4.d.** The ECO/alternate must maintain MSDSs for all HWs stored. A laboratory analysis must accompany any waste that is a process generated waste or an unknown material.
2	★	Are HWs properly segregated?	☐	☐	☐		**40 CFR 265.177 (c), USAG-HI-200-4(4.5.a).** *Collect different types of HW in separate drums/containers.....Properly segregate incompatible waste.*
3		Are HWs stored away from new and in-use material?	☐	☐	☐		**40 CFR 262.34(c)(1)**
4	★	Are the words "HAZARDOUS WASTE" marked on container(s) holding HW?	☐	☐	☐		**40 CFR 262.34(c)(1)(ii)**
5	★	Are all containers free of deficiencies, such as leaks, rust, corrosion, dents, and/or bulges?	☐	☐	☐		**40 CFR 265.171**
6	★	Are containers compatible with the wastes they hold?	☐	☐	☐		**40 CFR 265.172.** Consult the EPA'S Chemical Compatibility Chart, EPA-600/2-80-076 for compatibility information. Contact the DPW Environmental Inspections for assistance.
7	★	Are containers holding ignitable or reactive waste located at least 15 meters (50 feet) from the facility's property line?	☐	☐	☐		**40 CFR 265.176**
8	★	Is one copy of the SSP/TAP Hazardous Waste Collection Log for each container accumulating HW accurately maintained and kept inside the HWSSP and an identical copy kept in a location away from the HWSSP for spill response (i.e., an office inside the motorpool)?	☐	☐	☐		**USAG-HI-200-4,4.4.c.** *Maintain a separate collection log that accounts for the contents of all items placed into each drum or container. In addition to maintaining a separate collection log for each container inside the HWSSP, the ECO will have an additional copy of the collection logs kept in an area other than the HWSSP for spill response actions .*
9	★	Are all container(s) properly marked and labeled, to reflect the name and DOT hazard class of the waste?	☐	☐	☐		**40 CFR 262.31, USAG-HI-200-4,4.6.f.** *Place DOT hazard labels on each drum according to the hazard (e.g.flammable liquid).*
10	★	Are drum bungs/bolts wrench tightened after every use?	☐	☐	☐		**40 CFR 265.173(a).** *A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.*
11	★	Does the HWSSP contain less than 55 gallons of HW or 1 quart of acutely HW?	☐	☐	☐		**40 CFR 262.34(c)(1)**
12	★	Is the accumulation start date annotated on the HW label for containers in excess of 55 gallons of HW or 1 quart of acute HW at the HWSSP?	☐	☐	☐		**40 CFR 262.34(c)(2).** As soon as the amount of HW at the HWSSP/facility exceeds 55 gallons or 1 quart of acute waste, the generator must annotate the date on the HW label affixed to the container and the generator must contact the installation TAP immediately to ensure that the HW is transferred there within 72 hours.
13	★	Has all HW in excess of 55 gallons or 1 quart of acutely HW been transferred to the TAP within three calendar days of 55 gallon limit?	☐	☐	☐		

D. Operational Area

			YES	NO	N/A	Comments	Citation
1		Are spills/leaks in work areas, maintenance bays, and vehicle parking areas promptly cleaned up to the extent that only a dry stain remains?	☐	☐	☐		**USAG-HI SWPPP BMP28.** *Minor spills are cleaned by the organization that caused the spill or the organization with operational control where the spill occurred.* All spills should be reported to DPW (656-1111) by the ECO.
2		Are shop floors cleaned with dry sweep only?	☐	☐	☐		**USAG-HI SWPPP BMP04.** *Dry sweep, along with brooms and receptacles, should be placed in clearly marked locations at the complex.*
3	★	Are trash containers free of Hazardous Waste?	☐	☐	☐		**40 CFR 262.11.** Disposal of Hazardous/Non-Regulated Waste and/or Recyclable Material in the general refuse is strictly prohibited.
4		Are trash containers free of Non-RCRA Regulated Waste/Recyclable Material?	☐	☐	☐		
5		Is dry sweep or dry absorbent peat available for the cleanup of spills?	☐	☐	☐		**USAG-HI SWPPP BMP04.** *Dry sweep, along with brooms and receptacles, should be placed in clearly marked locations at the complex.*
6		Are containers of used dry sweep or dry absorbent peat available for the clean up of spills and are the containers marked "USED DRY SWEEP"?	☐	☐	☐		
7		Are solvent parts washer lids locked when not in use and kept free of dry sweep, rags, and other foreign matter?	☐	☐	☐		**USAG-HI-200-4, 4.13.m.(3).**
8		Are solvent parts washers used for cleaning parts only?	☐	☐	☐		**USAG-HI-200-4, 4.13.m.(1).** *Cleaning vehicle parts should be done by using the DPW contractor provided solvents parts washers only. Conversely, the DPW provided solvent parts washers should be used only for cleaning vehicle parts.*
9		Is there a process for recycling/disposing of used solvent?	☐	☐	☐		**USAG-HI-200-4, 4.13.m.(2).** *Only the DPW-provided solvent parts washer should be used for cleaning vehicle parts. Any other solvent parts washer (e.g. used for cleaning vehicle parts or weapons) must be approved by the DPW Environmental Division. Approval will be contingent upon the prior establishment of a process for the recycling or disposal of the used solvent.*

D. Operational Area					N/A	Comments	Citation
10		Are all contaminated rags kept in closable metal containers and properly marked/labeled for identification? (e.g. USED POL RAGS, USED ACETONE RAGS)	☐	☐	☐		**USAG-HI 200-4, 1.6.f.(17).** *Ensure that hazard warnings are posted and that containers of HM/HW are properly marked for identification and kept closed.*
11		Are daily accumulation containers for used aerosol paint cans marked/labeled "Used Aerosol Paints?"	☐	☐	☐		
12	★	Are all containers used to collect used oil products marked "USED OIL"?	☐	☐	☐		**40 CFR 279.22(c)(1).** *Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil".*
13		If temporary storage containers are used for used POL and antifreeze, are they marked/labeled for identification and with the words "EMPTY DAILY" and transferred into the proper accumulation drums at the RMSSP daily?	☐	☐	☐		Temporary storage containers should only be used when access to the RMSSP throughout the work day is limited. The temporary storage containers must be properly marked labeled (e.g. "USED OIL") in addition to being marked "EMPTY DAILY" and must be stored on secondary containment. These containers must be transferred to the RMSSP at the end of the day and the amount transferred must be annotated on the RMSSP Collection Logs.
14		Are maintenance and other work activities that could cause water contamination conducted away from storm/sewer drains?	☐	☐	☐		**USAG-HI SWPPP BMP32.** *Whenever practical, equipment maintenance shall be performed indoors or in an area that is isolated from the rain and has adequate facilities for the containment of spills.*
15		Are items that can be a source of contamination, such as hazardous materials, containment pallets, engines, parts, tools, or loose equipment that are outdoors, kept under cover to avoid contaminated runoff?	☐	☐	☐		**USAG-HI SWPPP BMP31.** *Mechanical equipment, chemical storage containers, wrecked or salvaged vehicles, parts, scrap metals, batteries, and other items that have been in contact with oil or chemicals shall be stored under cover.*
16		Is there a hazard communication station available in a visible location that contains the MSDSs for all materials being used in the operational area?	☐	☐	☐		**29 CFR 1910.1200 (g)(8).** *The employer shall maintain in the workplace copies of the required material safety data sheets for each hazardous chemical, and shall ensure that they are readily accessible during each work shift to employees when they are in their work area(s).*

E. Recyclable Material Shop Storage Point (RMSSP)

			YES	NO	N/A	Comments	Citation
1		Is the Recyclable Material Shop Storage Point (RMSSP) clean,orderly and free of severe structural deterioration?	☐	☐	☐		**USAG-HI SWPPP BMP18.** *Complex buildings, paving, and outdoor sites such as wash racks, fueling stations, and storage sheds should be maintained in good operational condition with regular cleaning to prevent the accumulation of trash, scrap material, and debris.*
2		Is there a warning sign designating the area as an RMSSP and are signs stating "No Smoking Within 50 Feet" posted in locations where they are visible from all approachable sides?	☐	☐	☐		**USAG-HI-200-4, 4.13.e.**
3	★	Does the RMSSP have adequate secondary containment?	☐	☐	☐		**USAG-HI SWPPP BMP18.** *Drums with a capacity of 15 gallons or greater should be stored inside areas having permanent containment features to prevent contamination of storm water and soil in event of a spill.*
4		Are the current emergency notification personnel and phone numbers posted?	☐	☐	☐		**USAG-HI-200-4, 4.13.e.**
5		Is a spill kit containing adequate supplies for spill response available?	☐	☐	☐		**USAG-HI-200-4, 4.13.l.** *A spill kit containing the following items must be kept on-site: (1) Granular absorbent in new dry-sweep cont. w/lid (50 lbs)* *(2) Absorbent pillows (5) or pads (Bundle of 100)* *(3) Straight edge, non-sparking shovel or dustpan (1)* *(4) Broom (1)* *(5) Used dry sweep container with lid (1)* *(6) Rubber gloves (2 pair)* *(7) Rubber boots (2 pair)* *(8) Absorbent booms, 8 or 10 feet long (2)* *(9) Empty overpack drum for largest container*
6		Is adequate aisle space (1 foot) present between drums?	☐	☐	☐		**USAG-HI-200-4, 4.13.c.** *Recyclable materials will be stored in DOT/POP approved 55 gallon steel drums. The containers must be compatible for the material they are holding and in good condition. There should be at least 12 inches of aisle space between drums. The containers must have the following proper air spaces between the top of the contents and the lid: for 55-gallon drums/containers, 3 to 4 inches; for 15-gallon drums/containers, 2 to 3 inches; for 5-gallon containers, 1.5 to 2 inches; for 1-gallon containers, 1 inch.*
7		Are all containers free of deficiencies, such as leaks, rust, corrosion,unserviceable bungs, dents, bulges, and/or grooves?	☐	☐	☐		
8		Are containers compatible for the material they are holding?	☐	☐	☐		
9		Do containers have the proper air spaces between the contents and the lid?	☐	☐	☐		

E. Recyclable Material Shop Storage Point (RMSSP)			YES	NO	N/A	Comments	Citation
10		Are drum bungs and bolts wrench tightened after every use?	☐	☐	☐		**USAG-HI-200-4, 4.13.d.** *Drum bungs or rings will be wrench tightened and the RMSSP will be locked at all times when recyclable material is not being added to the drums.*
11		Are "Non-regulated Waste" labels affixed on the container(s) holding non-regulated waste(s)?	☐	☐	☐		**USAG-HI-200-4, 4.14.b.1.** *Mark/Label the container holding the waste "Non-Regulated Waste" and indicate the name of the waste on the container or the label. Drums should be positioned so the markings/labels are easily read.*
12		Are drums positioned so labels are easily read?	☐	☐	☐		
13	★	Are all containers properly marked to reflect their contents (e.g. USED OIL) and are all other non-applicable markings and labels removed?	☐	☐	☐		**USAG-HI 200-4, 4.13.f, k.**
14		Are all drums in the RMSSP color-coded and labeled appropriately as stated below?					
14.a.	★	"USED OIL" (USED OIL includes engine oil, gear oil, all synthetic oil and transmission, hydraulic and brake fluid): RED	☐	☐	☐		**USAG-HI 200-4, 4.13.f.** *The color band will be painted around the middle third of the drum and the lettering will be stenciled on this band. Drums containing materials meeting the definition of any of the DOT hazard classes will be labeled with the appropriate DOT hazard label (e.g., MOGAS will be labeled with the "Flammable Liquid" label). Consult MSDSs to determine whether materials meet the definition of any of the hazard classes. All drums will be numbered to correspond with the accumulation log.*
14.b.		"USED ANTIFREEZE ONLY": GREEN	☐	☐	☐		
14.c.		"USED JP-8/DIESEL ONLY": YELLOW	☐	☐	☐		
14.d.		"USED MOGAS": FLUORESCENT ORANGE	☐	☐	☐		
14.e.		"ASBESTOS-DANGER INHALATION HAZARD": WHITE	☐	☐	☐		
14.f.		USED AEROSOL PAINT	☐	☐	☐		
15		Are RMSSP Collection Logs accurately maintained for each container used for the accumulation of recyclable materials/non-regulated waste and are identical copies kept in the RMSSP and at an alternate location for spill response?	☐	☐	☐		**USAG-HI 200-4, 4.13.g.** *The RMSSP/NRW Collection Log, USAG-HI Form 31 provided at Appendix X will be used to document the type and amount of recyclable material added to a drum in the RMSSP. One form should be used for each accumulation drum. One copy of the accumulation log will be kept inside the RMSSP and one copy will be kept in another readily available location (i.e., an office at the motorpool, etc.).*

F. Universal Waste Management

			YES	NO	N/A	Comments	Citation
1	★	Are containers holding UW properly marked to identify the waste being stored? ex: "UNIVERSAL WASTE – BATTERIES, UNIVERSAL WASTE - LAMPS"	☐	☐	☐		**40 CFR 273.34**
2	★	Is each container holding Universal Waste (UW) marked with the Accumulation Start Date (the earliest date that the UW became a waste)?	☐	☐	☐		**40 CFR 273.35**
3	★	Has the UW been stored no longer than six months from the Accumulation Start Date?	☐	☐	☐		**40CFR 273.35**
4		Is a spill kit with the appropriate spill response materials to contain a release of the UW available?	☐	☐	☐		**40 CFR 273.37**
5		Is a UW Collection Log accurately maintained?	☐	☐	☐		**40 CFR 273.35.** The ECO must maintain an inventory that identifies the earliest date that the UW being accumulated became a waste.
6		Are MSDSs for all UW present in a visible location within the storage area?	☐	☐	☐		**29 CFR 1910.1200, USAG-HI 200-4,1.6.f(21)**

G. Storm Water Pollution Prevention Plan/ Best Management Practices (BMP)

			YES	NO	N/A	Comments	Citation
1		Is the complex clean, neat and in good repair and are proper signs displayed?	☐	☐	☐		**USAG-HI SWPPP BMP01.** *Neat work areas reduce pollution by reducing potential for spills and storm water exposure to contaminants.*
2		Is equipment clean and in good condition or labeled for repair and are maintenance records current?	☐	☐	☐		**USAG-HI SWPPP BMP02.** *Regular cleaning maintains a neat appearance and is needed to inspect for leaks and drips.*
3		Are trash bins closed?	☐	☐	☐		**USAG-HI SWPPP BMP01.** *Trash bins should be closed and there should be no excess rubbish in the work areas.*
4		Are parts, supplies, scrap metal, wood, and other materials stored on pallets and in a manner to minimize exposure to storm water run-off?	☐	☐	☐		**USAG-HI SWPPP BMP05.** *Materials such as parts, supplies, scrap metal and wood should be stored on pallets if kept outside to minimize exposure to storm water runoff.*
5	★	Are liquids, POLs, parts, supplies, and other materials located away from storm drains and stored on covered secondary containment?	☐	☐	☐		
6		Are chemicals stored in the secured areas?	☐	☐	☐		**USAG-HI SWPPP BMP03.** *Security features include fences with locked gates, industrial chemicals stored in secured areas, and locks on fuel pumps when not in use.*
7	★	Are drums, hazardous materials, hazardous and non-regulated wastes properly labeled and stored to prevent discharge to storm drains/State waters?	☐	☐	☐		**USAG-HI SWPPP BMP01,16, 17, 18.** *Drums should be stored inside areas with permanent containment features to prevent contamination of storm water and soil in event of a spill.*
8	★	Are fuel transfer operations authorized by DPW Env Div and are they properly conducted to prevent discharge into the storm water system?	☐	☐	☐		**USAG-HI SWPPP BMP21.** *Spill-response materials shall be placed at readily accessible locations in fueling areas so that spills can be immediately cleaned.*
9	★	Are fuel trucks properly emptied/contained, inspected and maintained and are fuel pumps secured when not in use?	☐	☐	☐		**USAG-HI SWPPP BMP22, 23.** *Fuel-hauling trucks and portable POL tanks should be stored empty or in areas with containment curbs or trench drains to intercept spills.*
10		Are spill response materials and neutralizing compounds for chemicals present?	☐	☐	☐		**USAG-HI SWPPP BMP04.** *Areas used to store corrosive chemicals should have appropriate neutralizing compounds and containment materials.*
11	★	Are spills/leaks cleaned up to prevent storm water contamination?	☐	☐	☐		**USAG-HI SWPPP BMP28.** *Minor spills are cleaned by the organization that caused the spill and must be reported by the ECO to the DPW Environmental Division.*
12		Are vehicles parked on paved surfaces with drip pans?	☐	☐	☐		**USAG-HI SWPPP BMP06, 07.** *Vehicles should be parked on an impermeable surface. Drip pans should be placed below engines and other potential areas of leakage on vehicles and equipment that are parked or stored outside and exposed to storm water. Water in drip pans should be visually inspected for oil or other contaminants and properly cleaned as needed.*
13	★	Are drip pans located beneath leaking vehicles and are they maintained and replaced regularly?	☐	☐	☐		

G. Storm Water Pollution Prevention Plan/ BMPs			YES	NO	N/A	Comments	Citation
14		Is there no discoloration/no oil sheen or visible illicit discharges in storm water basins or storm drains?	☐	☐	☐		**USAG-HI SWPPP BMP08, 11.** *Drains should be inspected monthly by the ECO to see if sediment is clogging the storm water system. The inspection should also check for possible contaminants in the storm water system such as oil stains on sediment, an odor of fuel or other chemicals coming from the storm water system, or a discoloration of water or oily sheen on water. Discharge of non-storm water to storm water conveyance features is prohibited.*
15		Is the wash rack/trench drain cleaned regularly?	☐	☐	☐		**USAG-HI SWPPP BMP15.** *Weekly inspections by the ECO shall check for debris in trench and floor drains, verify that pipes are not blocked, and note the amount of sediment in grit chambers and settling basins. If necessary, the ECO shall contact DPW to arrange for cleaning or repair of drains and washracks.*
16		Are trench drains adequate to intercept spills?	☐	☐	☐		**USAG-HI SWPPP BMP19.** *Weekly inspections by the ECO shall verify that work involving the handling, disbursement, or transfer of significant liquids is done only in areas with containment features or that material spills in areas without containment features can be quickly controlled with spill-response equipment on site.*
17		Is the oil water separator serviced and maintained quarterly and are contractor servicing records maintained at the facility?	☐	☐	☐		**USAG-HI SWPPP BMP10, 11,14.** *The ECO shall verify that oil-water separators and other facilities to treat industrial wastewater are cleaned and inspected according to maintenance contracts administered by DPW.*
18		Are storm drains stenciled and cleaned regularly?	☐	☐	☐		**USAG-HI SWPPP BMP08, 13.** *Inlets to the storm water system should have signs stenciled or posted nearby stating that the storm water inlets lead to the ocean (contact DPW Env Div for storm drain markers).*
19	★	Is only storm water going to storm system?	☐	☐	☐		**USAG-HI SWPPP BMP09.** *Storm water outside of contained process areas such as wash racks, maintenance platforms, and fueling areas should not flow to oil-water separators or enter the sanitary sewer system. Monthly visual inspections by the ECO should verify that, as far as can be determined and except for designated areas, storm water will only flow to the storm water system and not enter the sanitary-sewer system.*

Unit/Activity Name:	Inspector:	Date:

H. Transfer and Accumulation Point (TAP)/90-Day ASF Management

			YES	NO	N/A	Comments	Citation
1	★	Is a job title and description (or appointment orders), with the name of the person filling the job, available for the position of TAP/90-day ASF manager/alternate?	☐	☐	☐		USAG-HI 200-4, 5.1.d(1), 40 CFR 265.16(d)(2)
2	★	Has the TAP/90-day ASF manager/alternate attended the resident initial ECO class and are copies of the certificates on file?	☐	☐	☐		USAG-HI 200-4, 5.1.d(5), 40 CFR 265.16(a)(1))
3	★	Has the TAP/90-day ASF manager/alternate attended the resident ECO refresher training within 1 year of most recent training?	☐	☐	☐		USAG-HI 200-4, 5.1.d(6), 40 CFR 265.16(c)
4	★	Has the TAP/90-day ASF manager/alternate attended a DOD approved "Transportation of Hazardous Materials" course and refresher training every 2 years and are the certificates on file?	☐	☐	☐		USAG-HI 200-4, 5.1.d(7), DOD 4500.9-R
5		Has the TAP/90-day ASF manager/alternate been delegated by the HW Program Manager the authority to sign the Uniform Hazardous Waste Manifest (UHWM EPA 8700-22 (rev 3-05)) for the commander and is the delegation memo on file?	☐	☐	☐		USAG-HI 200-4, 1.6(19)(j), AR 200-1 10-1.d (6), 49 CFR 172.700–704 (Subpart H); DOD 4500.9–R, chapter 204
6	★	Has the TAP/90-day ASF manager/alternate completed an initial 40-hour course in "Hazardous Waste Operations and Emergency Response (HAZWOPER)"and is a certificate on file?	☐	☐	☐		USAG-HI 200-4, 5.1.d.(8), 29 CFR 1910.120(e)(2)
7	★	Has the TAP/90-day ASF manager/alternate completed an 8-hour refresher course in HAZWOPER within 1 year of most recent training and is a certificate on file?	☐	☐	☐		USAG-HI 200-4, 1.6(19)(k), 29 CFR 1910.120(e)(8)
8		Does the TAP/90-day ASF maintain historic documentation for a period of 3 years for the following :					
8.a.	★	The HW Manifest ?	☐	☐	☐		40 CFR 262.40(c), USAG-HI 200-4, 5.9.c.(2)(e)
8.b.	★	The DD Form 1348-1a and HW Profile Sheet, DRMS Form 1930?	☐	☐	☐		USAG-HI 200-4, 5.9.c(2)(f)
8.c.	★	Laboratory Analyses ?	☐	☐	☐		40 CFR 262.40(c), USAG-HI 200-4, 5.9.c.(2)(c)
8.d.	★	Exception Reports ?	☐	☐	☐		40 CFR 262.40(b), USAG-HI 200-4, 5.9.c.(2)(h)
8.e.	★	Land Disposal Restriction Forms ?	☐	☐	☐		40 CFR 268.7(a)(7), USAG-HI 200-4, 5.9.c.(2)(i)
9	★	Are the weekly TAP/90-day ASF Inspection Logs completed correctly (i.e., dates, times, and results entered accordingly)?	☐	☐	☐		40 CFR 265.174, USAG-HI 200-4, 5.9.c.(3)

H. Transfer and Accumulation Point (TAP)/90-Day ASF Management

			YES	NO	N/A	Comments	Citation
10	★	Are the TAP/90-day ASF container(s) inspection logs completed correctly on a weekly basis (i.e., inspection date, total number of drums inspected, ID numbers, and comments)?	☐	☐	☐		USAG-HI 200-4, 5.9.b.(1)
11		Are the TAP/90-day ASF inventory logs completed?	☐	☐	☐		USAG-HI 200-4, 5.7.b.
12	★	Has the TAP/90-day ASF manager/alternate followed up on UHWMs not returned in 35-days of date accepted by the transporter?	☐	☐	☐		40 CFR 262.42(a)(1), USAG-HI 200-4, 5.8.c.(e)
13	★	Has the TAP/90-day ASF manager/alternate submitted an exception report for UHWMs not returned within 45-days of date accepted by the transporter?	☐	☐	☐		40 CFR 262.42(a)(2), USAG-HI 200-4, 5.8.c.(f)
14	★	Does the TAP/90-day ASF have an updated SOP?	☐	☐	☐		USAG-HI 200-4, 5.1.d (12)
15		Does the TAP/90-day ASF have an updated Site Safety and Health Plan (SSHP)?	☐	☐	☐		USAG-HI 200-4, 5.1.d (11)
16	★	Have all TAP personnel signed a statement that they have read and understood the SSHP?	☐	☐	☐		
17		Does the TAP/90-day ASF have readily available copies of the USAG-HI, Spill Prevention, Control and Countermeasures (SPCC) Plan?	☐	☐	☐		USAG-HI 200-4, 5.1.d (14)
18	★	Does the facility have current "TAP Emergency Procedures"/ Spill Contingency Plan (SCP) in place with information on "Notifications and Arrangements" with local authorities and signed a certification statement that they have read and understood the SCP?	☐	☐	☐		40 CFR 265.37, 40 CFR 265.51(a), 40CFR 265.54, USAG-HI 200-4, 5.2.d, USAG-HI 200-4, 5.1.d (13)
19		Does TAP "Notifications and Arrangements" familiarize local authorities with the following information:					40 CFR 265.37(a)
19.a		Layout of the TAP Facility?	☐	☐	☐		
19.b.		Properties of HW handled and associated hazards?	☐	☐	☐		
19.c.		Places personnel will be normally working?	☐	☐	☐		
19.d.		Entrances to roads inside the facility?	☐	☐	☐		
19.e.		Evacuation routes?	☐	☐	☐		
19.f.		Types of injuries that could result from fires, explosions or releases from the TAP Facility?	☐	☐	☐		

H. Transfer and Accumulation Point (TAP)/90-Day ASF Management

			YES	NO	N/A	Comments	Citation
20		Were arrangements made with the following local authorities:					
20.a.		Federal and Local Police?	☐	☐	☐		40 CFR 265.37
20.b.		Federal and Local Fire Departments?	☐	☐	☐		
20.c.		State and Contractor Emergency Response Teams?	☐	☐	☐		
20.d.		Government and Local Hospitals?	☐	☐	☐		
21		Have the local authorities signed that they have received a copy of the "Notification and Arrangements" and Spill Contingency Plan and is a copy of the notification letter of arrangements with local authorities on file?	☐	☐	☐		40 CFR 265.37
22		Where State or Local authorities decline to accept such arrangements, is such refusal documented and kept on file?	☐	☐	☐		40 CFR 265.37(b)
23		Is the TAP/90-day ASF secured to prevent unauthorized access, free of severe structural deterioration and does the structure have secondary containment capable of preventing spills into the environment?	☐	☐	☐		40 CFR 265.31, USAG-HI 200-4, 5.2.a.
24		Are "Danger - Flammable Materials, No Smoking Within 50 Feet, Hazardous Waste Transfer and Accumulation Point (TAP)/90-day Accumulation and Storage Facility, Unauthorized Personnel Keep Out" signs posted on all visible sides?	☐	☐	☐		SWCP BMP 03, 29 CFR 1910.106(d)(6)(iv), 29 CFR1910.106(d)(7)(iii), 29 CFR 1910.106(e)(6), USAG-HI 200-4, 5.2.b.
25		Is there a telephone working, available and accessible?	☐	☐	☐		40 CFR 265.32(b), USAG-HI 200-4, 5.2.b.(4)
26	★	Is there, at all times, a designated emergency coordinator for the TAP/90-day ASF that has the responsibility and authority to commit the resources needed to carry out the contingency plan?	☐	☐	☐		40 CFR 265.55
27	★	Does the emergency coordinator know what responses are required in cases of fire, explosions, minor spills and major spills?	☐	☐	☐		
28	★	Is the facility equipped with a fire extinguisher that is charged, accessible, seal intact and compatible for the waste being stored?	☐	☐	☐		40 CFR 265.32(c), USAG-HI 200-4, 5.2.b.(2)
29	★	Is there an adequate supply of water via hose or sprinkler system?	☐	☐	☐		40 CFR 265.32(d), USAG-HI 200-4, 5.2.b.(5)

H. Transfer and Accumulation Point (TAP)/90-Day ASF Management

			YES	NO	N/A	Comments	Citation
30		Are the following emergency notification personnel and activity phone numbers posted in a visible location on the outside of the structure:					40 CFR 265.52(d), USAG-HI 200-4, 5.2.c.
30.a.	★	The TAP/90-day ASF Manager?	☐	☐	☐		40 CFR 265.55
30.b.		The TAP/90-day ASF Alternate?	☐	☐	☐		
30.c.		Fire Department?	☐	☐	☐		40 CFR 265.37
30.d.		Military/DOD Police?	☐	☐	☐		
30.e.		Directorate of Public Works?	☐	☐	☐		
31		Are spill control equipment (spill kits)/decontamination equipment (PPE) available and compatible/sufficient for wastes stored in the facility?	☐	☐	☐		40 CFR 265.32(c), USAG-HI 200-4, 5.3.f.
32		Does the TAP/90-day ASF have a current diagram of the area(s) where it stores HWs and an evacuation route posted in a visible location?	☐	☐	☐		40 CFR 265.37(a)(1)
33	★	Does the TAP personnel have copies of MSDSs/ laboratory analyses for all HW located on-site?	☐	☐	☐		29 CFR 1910.1200
34	★	Is adequate aisle space present between drums to allow unobstructed movement for emergency response equipment and inspections?	☐	☐	☐		40 CFR 265.35, USAG-HI 200-4, 5.7.e.
35	★	Are HWs properly segregated (i.e. acids and bases)?	☐	☐	☐		40 CFR 265.177(c)
36		Are SSP/TAP/90-day ASF Hazardous Waste Collection Logs maintained for containers used for the accumulation of HW?	☐	☐	☐		USAG-HI 200-4, 5.9.c.(2)(b)
37	★	Are all containers free of leaks (per 40 CFR 265.171), rust (more than surface rust) (per 40 CFR 265.171), corrosion (per 40 CFR 265.171),unserviceable bungs?	☐	☐	☐		40 CFR 265.171, 40 CFR 265.173
38	★	Are containers compatible with the wastes they are holding?	☐	☐	☐		40 CFR 265.172, USAG-HI 200-4, 5.7.g.
39	★	Are the words "Hazardous Waste" marked on container(s) holding HW?	☐	☐	☐		40 CFR 262.34(a)(3)
40	★	Are all container(s) properly marked, to reflect the name of the waste stored inside?	☐	☐	☐		40 CFR 262.32
41	★	Are all container(s) properly labeled?	☐	☐	☐		40 CFR 262.31, USAG-HI 200-4, 5.7.h.
42	★	Are containers positioned so labels can be easily read?	☐	☐	☐		
43	★	Are all containers kept closed except when adding or removing wastes or stored in a manner to prevent leakage?	☐	☐	☐		40 CFR 265.173(a)

H. Transfer and Accumulation Point (TAP)/90-Day ASF Management

			YES	NO	N/A	Comments	Citation
44	★	Is the accumulation start date annotated on the HW label on containers stored at the TAP/90-day ASF ?	☐	☐	☐		40 CFR 262.34(a)(2), USAG-HI 200-4, 5.7.a.
45	★	If holding ignitable or reactive wastes, is the TAP/90-day ASF located 50 feet from the post property line?	☐	☐	☐		40 CFR 265.176
46		Are drums used for the accumulation of flammable liquids properly grounded with the following:					29 CFR1910.106(e)(6)(ii)
46.a.	★	Is the cable constructed of stranded wire?	☐	☐	☐		
46.b.	★	Is cable free of visible signs of corrosion?	☐	☐	☐		
46.c.	★	Is the cable copper or carbon-steel?	☐	☐	☐		

Unit/Activity Name:	Inspector:	Date:

H1. Conditionally Exempt Small Quantity Generator (CESQG) Transfer and Accumulation Point (TAP) Management

			YES	NO	N/A	Comments	Citation
1	★	Is a job title and description (or appointment orders), with the name of the person filling the job, available for the position of TAP manager/alternate?	☐	☐	☐		USAG-HI 200-4, 5.1.d(1), 40 CFR 265.16(d)(2)
2	★	Has the TAP manager/alternate attended the resident initial ECO class and are copies of the certificates on file?	☐	☐	☐		USAG-HI 200-4, 5.1.d(5), 40 CFR 265.16(a)(1))
3	★	Has the TAP manager/alternate attended the resident ECO refresher training within 1 year of most recent training?	☐	☐	☐		USAG-HI 200-4, 5.1.d(6), 40 CFR 265.16(c)
4	★	Has the TAP/90-day ASF manager/alternate attended a DOD approved "Transportation of Hazardous Materials" course and refresher training every 2 years and are the certificates on file?	☐	☐	☐		USAG-HI 200-4, 5.1.d(7), DOD 4500.9-R
5		Has the TAP/90-day ASF manager/alternate been delegated by the HW Program Manager the authority to sign the Uniform Hazardous Waste Manifest (UHWM EPA 8700-22 (rev 3-05)) for the commander and is the delegation memo on file?	☐	☐	☐		USAG-HI 200-4, 1.6(19)(j), AR 200-1 10-1.d (6), 49 CFR 172.700–704 (Subpart H); DOD 4500.9–R, chapter 204
6	★	Has the TAP/90-day ASF manager/alternate/ completed an initial 40-hour course in "Hazardous Waste Operations and Emergency Response (HAZWOPER)" and is a certificate on file?	☐	☐	☐		USAG-HI 200-4, 5.1.d(8), 29 CFR 1910.120(e)(2)
7	★	Has the TAP/90-day ASF manager/alternate completed an 8-hour refresher course in HAZWOPER within 1 year of most recent training and is a certificate on file?	☐	☐	☐		USAG-HI 200-4, 1.6(19)(k), 29 CFR 1910.120(e)(8)
8		Does the TAP/90-day ASF maintain historic documentation for a period of 3 years for the following :					
8.a.	★	The HW Manifest ?	☐	☐	☐		40 CFR 262.40(c), USAG-HI 200-4, 5.9.c.(2)(e)
8.b.	★	The DD Form 1348-1a and HW Profile Sheet, DRMS Form 1930?	☐	☐	☐		USAG-HI 200-4, 5.9.c(2)(f)
8.c.	★	Laboratory Analyses ?	☐	☐	☐		40 CFR 262.40(c), USAG-HI 200-4, 5.9.c.(2)(c)
8.d.	★	Exception Reports ?	☐	☐	☐		40 CFR 262.40(b), USAG-HI 200-4, 5.9.c.(2)(h)
8.e.	★	Land Disposal Restriction Forms ?	☐	☐	☐		40 CFR 268.7(a)(7), USAG-HI 200-4, 5.9.c.(2)(i)
9	★	Are the weekly TAP Inspection Logs completed correctly (i.e., dates, times, and results entered accordingly)?	☐	☐	☐		40 CFR 265.174, USAG-HI 200-4, 5.9.c.(3)

H1. CESQG Transfer and Accumulation Point (TAP) Management

			YES	NO	N/A	Comments	Citation
10	★	Are the TAP container(s) inspection logs completed correctly on a weekly basis (i.e., inspection date, total number of drums inspected, ID numbers, and comments)?	☐	☐	☐		USAG-HI 200-4, 5.9.b.(1)
11		Are the TAP inventory logs completed?	☐	☐	☐		USAG-HI 200-4, 5.7.b.
12	★	Does the TAP have installation monthly HW generation logs that accurately document reflect the unit/activity, location, ECO, weight and date of the HW generated on the installation?	☐	☐	☐		USAG-HI 200-4
13	★	Do the installation HW generation logs show that there is no more than 220 lbs. (100 kg) per month of HW and no more than 2.2 lbs. (1 kg) of acute HW generated on the installation?	☐	☐	☐		40 CFR 261.5, USAG-HI 200-4
14	★	Do the installation HW generation logs show that no more than 2200 lbs. (1000 kgs) aggregate of HW has been stored on the installation at any one time?	☐	☐	☐		
15	★	If the installation HW generation logs show that the CESG limits have been exceeded, has the TAP been operating as a Small or Large Quantity Generator based on the amount of HW generated?	☐	☐	☐		40 CFR 261.5(g)(2), USAG-HI 200-4
16	★	Does the TAP have a current and updated SOP?	☐	☐	☐		USAG-HI 200-4, 5.1.d (12)
17		Does the TAP have readily available copies of the USAG-HI, Spill Prevention, Control and Countermeasures (SPCC) Plan?	☐	☐	☐		USAG-HI 200-4, 5.1.d (14)
18		Is the TAP secured to prevent unauthorized access, free of severe structural deterioration and does the structure have secondary containment capable of preventing spills into the environment?	☐	☐	☐		40 CFR 265.31, USAG-HI 200-4, 5.2.a.
19		Are "Danger - Flammable Materials, No Smoking Within 50 Feet, Hazardous Waste Transfer and Accumulation Point (TAP)/90-day Accumulation and Storage Facility, Unauthorized Personnel Keep Out" signs posted on all visible sides?	☐	☐	☐		SWCP BMP 03, 29 CFR 1910.106(d)(6)(iv), 29 CFR1910.106(d)(7)(iii), 29 CFR 1910.106(e)(6)
20		Is there a telephone working, available and accessible?	☐	☐	☐		40 CFR 265.32(b), USAG-HI 200-4, 5.2.b.(4)
21		Is the facility equipped with a fire extinguisher that is charged, accessible, seal intact and compatible for the waste being stored?	☐	☐	☐		40 CFR 265.32(c), USAG-HI 200-4, 5.2.b.(2)
22		Is there an adequate supply of water via hose or sprinkler system?	☐	☐	☐		40 CFR 265.32(d), USAG-HI 200-4, 5.2.b.(5)

H1. CESQG Transfer and Accumulation Point (TAP) Management

			YES	NO	N/A	Comments	Citation
23		Are the following emergency notification personnel and activity phone numbers posted in a visible location on the outside of the structure:					40 CFR 265.52(d), USAG-HI 200-4, 5.2.c.
23.a.	★	The TAP Manager?	☐	☐	☐		40 CFR 265.55
23.b.		The TAP Alternate?	☐	☐	☐		
23.c.		Fire Department?	☐	☐	☐		40 CFR 265.37
23.d.		Military/DOD Police?	☐	☐	☐		
23.e.		Directorate of Public Works?	☐	☐	☐		
24		Are spill control equipment (spill kits)/decontamination equipment (PPE) available and compatible/sufficient for wastes stored in the facility?	☐	☐	☐		40 CFR 265.32(c)
25		Does the TAP/90-day ASF have a current diagram of the area(s) where it stores HWs and an evacuation route posted in a visible location?	☐	☐	☐		40 CFR 265.37(a)(1)
26	★	Is adequate aisle space present between drums to allow unobstructed movement for emergency response equipment and inspections?	☐	☐	☐		40 CFR 265.35
27	★	Are HWs properly segregated (i.e. acids and bases)?	☐	☐	☐		40 CFR 265.177(c)
28		Are SSP/TAP Hazardous Waste Collection Logs maintained for containers used for the accumulation of HW?	☐	☐	☐		USAG-HI 200-4, 5.9.c.(2)(b)
29	★	Are all containers free of leaks (per 40 CFR 265.171), rust (more than surface rust) (per 40 CFR 265.171), corrosion (per 40 CFR 265.171),unserviceable bungs?	☐	☐	☐		40 CFR 265.171, 40 CFR 265.173
30	★	Are containers compatible with the wastes they are holding?	☐	☐	☐		40 CFR 265.172
31	★	Are the words "Hazardous Waste" marked on container(s) holding HW?	☐	☐	☐		40 CFR 262.34(a)(3)
32	★	Are all container(s) properly marked, to reflect the name of the waste stored inside?	☐	☐	☐		40 CFR 262.32
33	★	Are all container(s) properly labeled?	☐	☐	☐		40 CFR 262.31
34	★	Are containers positioned so labels can be easily read?	☐	☐	☐		
35	★	Are all containers kept closed except when adding or removing wastes or stored in a manner to prevent leakage?	☐	☐	☐		40 CFR 265.173(a)
36	★	Is the accumulation start date annotated on the HW label on containers stored at the TAP?	☐	☐	☐		40 CFR 262.34(a)(2)

H1. CESQG Transfer and Accumulation Point (TAP) Management								
			YES	NO	N/A	Comments	Citation
37	★	If holding ignitable or reactive wastes, is the TAPlocated 50 feet from the post property line?	☐	☐	☐		40 CFR 265.176
38		Are drums used for the accumulation of flammable liquids properly grounded with the following:					29 CFR1910.106(e)(6)(ii)
38.a.	★	Is the cable constructed of stranded wire?	☐	☐	☐		
38.b.	★	Is cable free of visible signs of corrosion?	☐	☐	☐		
38.c.	★	Is the cable copper or carbon-steel?	☐	☐	☐		

Unit/Activity Name:	Inspector:	Date:

H2. Small Quantity Generator (SQG) Transfer and Accumulation Point (TAP) Management

			YES	NO	N/A	Comments	Citation
1	★	Is a job title and description (or appointment orders), with the name of the person filling the job, available for the position of TAP/180-day ASF manager/alternate?	☐	☐	☐		USAG-HI 200-4, 5.1.d(1), 40 CFR 265.16(d)(2)
2	★	Has the TAP/180-day ASF manager/alternate attended the resident initial ECO class and are copies of the certificates on file?	☐	☐	☐		USAG-HI 200-4, 5.1.d(5), 40 CFR 265.16(a)(1))
3	★	Has the TAP/180-day ASF manager/alternate attended the resident ECO refresher training within 1 year of most recent training?	☐	☐	☐		USAG-HI 200-4, 5.1.d(6), 40 CFR 265.16(c)
4	★	Has the TAP/180-day ASF manager/alternate attended a DOD approved "Transportation of Hazardous Materials" course and refresher training every 2 years and are the certificates on file?	☐	☐	☐		USAG-HI 200-4, 5.1.d(7), DOD 4500.9-R
5		Has the TAP/180-day ASF manager/alternate been delegated by the HW Program Manager the authority to sign the Uniform Hazardous Waste Manifest (UHWM EPA 8700-22 (rev 3-05)) for the commander and is the delegation memo on file?	☐	☐	☐		USAG-HI 200-4, 1.6(19)(j), AR 200-1 10-1.d (6), 49 CFR 172.700–704 (Subpart H); DOD 4500.9–R, chapter 204
6	★	Has the TAP/180-day ASF manager/alternate completed an initial 40-hour course in "Hazardous Waste Operations and Emergency Response (HAZWOPER)" and is a certificate on file?	☐	☐	☐		USAG-HI 200-4, 5.1.d.(8), 29 CFR 1910.120(e)(2)
7	★	Has the TAP/180-day ASF manager/alternate completed an 8-hour refresher course in HAZWOPER within 1 year of most recent training and is a certificate on file?	☐	☐	☐		USAG-HI 200-4, 1.6(19)(k), 29 CFR 1910.120(e)(8)
8	★	Does the TAP/180-day ASF maintain historic documentation for a period of 3 years for the following:					
8.a.	★	The HW Manifest ?	☐	☐	☐		40 CFR 262.40(c), USAG-HI 200-4, 5.9.c.(2)(e)
8.b.	★	The DD Form 1348-1a and HW Profile Sheet, DRMS Form 1930?	☐	☐	☐		USAG-HI 200-4, 5.9.c(2)(f)
8.c.	★	Laboratory Analyses ?	☐	☐	☐		40 CFR 262.40(c), USAG-HI 200-4, 5.9.c.(2)(c)
8.d.	★	Exception Reports ?	☐	☐	☐		40 CFR 262.40(b), USAG-HI 200-4, 5.9.c.(2)(h)
8.e.	★	Land Disposal Restriction Forms ?	☐	☐	☐		40 CFR 268.7(a)(7), USAG-HI 200-4, 5.9.c.(2)(i)
9	★	Are the weekly TAP/180-day ASF Inspection Logs completed correctly (i.e., dates, times, and results entered accordingly)?	☐	☐	☐		40 CFR 265.174, USAG-HI 200-4, 5.9.c.(3)

H2. SQG Transfer and Accumulation Point (TAP) Management

			YES	NO	N/A	Comments	Citation
10	★	Are the TAP/180-day ASF container(s) inspection logs completed correctly on a weekly basis (i.e., inspection date, total number of drums inspected, ID numbers, and comments)?	☐	☐	☐		USAG-HI 200-4, 5.9.b.(1)
11		Are the TAP/90-day ASF inventory logs completed?	☐	☐	☐		USAG-HI 200-4, 5.7.b.
12	★	Does the TAP have installation monthly HW generation logs that accurately document reflect the unit/activity, location, ECO, weight and date of the HW generated on the installation?	☐	☐	☐		USAG-HI 200-4
13	★	Do the installation HW generation logs show that there is no more than 2200 lbs. (1000 kg) per month of HW generated on the installation?	☐	☐	☐		40 CFR 262.34(d), USAG-HI 200-4
14	★	Do the installation HW generation logs show that no more than 6000 kgs aggregate of HW has been stored on the installation at any one time?	☐	☐	☐		40 CFR 262.34(d)(1) ,USAG-HI 200-4
15	★	If the installation HW generation logs show that the SGG limits have been exceeded, has the TAP been operating as a Large Quantity Generator?	☐	☐	☐		
16	★	Has the TAP/180-day ASF manager/alternate followed up on UHWMs not returned in 50-days of date accepted by the transporter?	☐	☐	☐		40 CFR 262.42(b), USAG-HI 200-4, 5.8.c.(e)
17	★	Has the TAP/180-day ASF manager/alternate submitted an exception report for UHWMs not returned within 60-days of date accepted by the transporter?	☐	☐	☐		40 CFR 262.42(b), USAG-HI 200-4, 5.8.c.(f)
18	★	Does the TAP/180-day ASF have an updated SOP?	☐	☐	☐		USAG-HI 200-4, 5.1.d (12)
19		Does the TAP/180-day ASF have an updated Site Safety and Health Plan (SSHP)?	☐	☐	☐		USAG-HI 200-4, 5.1.d (11)
20		Have all TAP personnel signed a statement that they have read and understood the SSHP?	☐	☐	☐		
21		Does the TAP/180-day ASF have readily available copies of the USAG-HI, Spill Prevention, Control and Countermeasures (SPCC) Plan?	☐	☐	☐		USAG-HI 200-4, 5.1.d (14)
22		Does the facility have current "TAP Emergency Procedures"/ Spill Contingency Plan (SCP) in place with information on "Notifications and Arrangements" with local authorities and signed a certification statement that they have read and understood the SCP?	☐	☐	☐		40 CFR 265.37, 40 CFR 265.51(a), 40CFR 265.54, USAG-HI 200-4, 5.2.d, USAG-HI 200-4, 5.1.d (13)

H2. SQG Transfer and Accumulation Point (TAP) Management

			YES	NO	N/A	Comments	Citation
23		Does TAP "Notifications and Arrangements" familiarize local authorities with the following information:					40 CFR 265.37(a)
23.a.		Layout of the TAP Facility?	☐	☐	☐		
23.b.		Properties of HW handled and associated hazards?	☐	☐	☐		
23.c.		Places personnel will be normally working?	☐	☐	☐		
23.d.		Entrances to roads inside the facility?	☐	☐	☐		
23.e.		Evacuation routes?	☐	☐	☐		
23.f.		Types of injuries that could result from fires, explosions or releases from the TAP Facility?	☐	☐	☐		
24		Were arrangements made with the following local authorities:					40 CFR 265.37
24.a.		Federal and Local Police?	☐	☐	☐		
24.b.		Federal and Local Fire Departments?	☐	☐	☐		
24.c.		State and Contractor Emergency Response Teams?	☐	☐	☐		
24.d.		Government and Local Hospitals?	☐	☐	☐		
25		Have the local authorities signed that they have received a copy of the "Notification and Arrangements" and Spill Contingency Plan and is a copy of the notification letter of arrangements with local authorities on file?	☐	☐	☐		40 CFR 265.37
26		Where State or Local authorities decline to accept such arrangements, is such refusal documented and kept on file?	☐	☐	☐		40 CFR 265.37(b)
27		Is the TAP/180-day ASF secured to prevent unauthorized access, free of severe structural deterioration and does the structure have secondary containment capable of preventing spills into the environment?	☐	☐	☐		40 CFR 265.31, USAG-HI 200-4, 5.2.a.
28		Are "Danger - Flammable Materials, No Smoking Within 50 Feet, Hazardous Waste Transfer and Accumulation Point (TAP)/180-day Accumulation and Storage Facility, Unauthorized Personnel Keep Out" signs posted on all visible sides?	☐	☐	☐		SWCP BMP 03, 29 CFR 1910.106(d)(6)(iv), 29 CFR1910.106(d)(7)(iii), 29 CFR 1910.106(e)(6), USAG-HI 200-4, 5.2.b.
29		Is there a telephone working, available and accessible?	☐	☐	☐		40 CFR 265.32(b), USAG-HI 200-4, 5.2.b.(4)
30	★	Is there, at all times, a designated emergency coordinator for the TAP/180-day ASF that has the responsibility and authority to commit the resources needed to carry out the contingency plan?	☐	☐	☐		40 CFR 265.55

H2. SQG Transfer and Accumulation Point (TAP) Management

			YES	NO	N/A	Comments	Citation
31	★	Does the emergency coordinator know what responses are required in cases of fire, explosions, minor spills and major spills?	☐	☐	☐		40 CFR 265.55
32	★	Is the facility equipped with a fire extinguisher that is charged, accessible, seal intact and compatible for the waste being stored?	☐	☐	☐		40 CFR 265.32(c), USAG-HI 200-4, 5.2.b.(2)
33	★	Is there an adequate supply of water via hose or sprinkler system?	☐	☐	☐		40 CFR 265.32(d), USAG-HI 200-4, 5.2.b.(5)
34		Are the following emergency notification personnel and activity phone numbers posted in a visible location on the outside of the structure:					40 CFR 265.52(d), USAG-HI 200-4, 5.2.c.
34.a.	★	The TAP/180-day ASF Manager?	☐	☐	☐		40 CFR 265.55
34.b.		The TAP/180-day ASF Alternate?	☐	☐	☐		
34.c.		Fire Department?	☐	☐	☐		40 CFR 265.37
34.d.		Military/DOD Police?	☐	☐	☐		
34.e.		Directorate of Public Works?	☐	☐	☐		
35		Are spill control equipment (spill kits)/decontamination equipment (PPE) available and compatible/sufficient for wastes stored in the facility?	☐	☐	☐		40 CFR 265.32(c), USAG-HI 200-4, 5.3.f.
36		Does the TAP/180-day ASF have a current diagram of the area(s) where it stores HWs and an evacuation route posted in a visible location?	☐	☐	☐		40 CFR 265.37(a)(1)
37	★	Does the TAP personnel have copies of MSDSs/ laboratory analyses for all HW located on-site?	☐	☐	☐		29 CFR 1910.1200
38	★	Is adequate aisle space present between drums to allow unobstructed movement for emergency response equipment and inspections?	☐	☐	☐		40 CFR 265.35, USAG-HI 200-4, 5.7.e.
39	★	Are HWs properly segregated (i.e. acids and bases)?	☐	☐	☐		40 CFR 265.177(c)
40		Are SSP/TAP/180-day ASF Hazardous Waste Collection Logs maintained for containers used for the accumulation of HW?	☐	☐	☐		USAG-HI 200-4, 5.9.c.(2)(b)
41	★	Are all containers free of leaks rust (more than surface rust), corrosion,unserviceable bungs?	☐	☐	☐		40 CFR 265.171, 40 CFR 265.173
42	★	Are containers compatible with the wastes they are holding?	☐	☐	☐		40 CFR 265.172, USAG-HI 200-4, 5.7.g.
43	★	Are the words "Hazardous Waste" marked on container(s) holding HW?	☐	☐	☐		40 CFR 262.34(a)(3)

H2. SQG Transfer and Accumulation Point (TAP) Management								
			YES	NO	N/A	Comments	Citation
44	★	Are all container(s) properly marked, to reflect the name of the waste stored inside?	☐	☐	☐		40 CFR 262.32
45	★	Are all container(s) properly labeled?	☐	☐	☐		40 CFR 262.31, USAG-HI 200-4, 5.7.h.
46	★	Are containers positioned so labels can be easily read?	☐	☐	☐		
47	★	Are all containers kept closed except when adding or removing wastes or stored in a manner to prevent leakage?	☐	☐	☐		40 CFR 265.173(a)
48	★	Is the accumulation start date annotated on the HW label on containers stored at the TAP/90-day ASF ?	☐	☐	☐		40 CFR 262.34(a)(2), USAG-HI 200-4, 5.7.a.
49	★	If holding ignitable or reactive wastes, is the TAP/180-day ASF located 50 feet from the post property line?	☐	☐	☐		40 CFR 265.176
50		Are drums used for the accumulation of flammable liquids properly grounded with the following:					29 CFR1910.106(e)(6)(ii)
50.a.	★	Is the cable constructed of stranded wire?	☐	☐	☐		
50.b.	★	Is cable free of visible signs of corrosion?	☐	☐	☐		
50.c.	★	Is the cable copper or carbon-steel?	☐	☐	☐		

APPENDIX E-1
SAMPLE APPOINTMENT ORDERS

OFFICE SYMBOL DATE

MEMORANDUM FOR Unit Environmental Compliance Officer (ECO) Appointees

SUBJECT: Additional Duty Appointment

1. Effective this date, the following personnel are appointed as ECOs for (*Include complete unit name*).

   a. Name (Primary ECO).

   b. Name (Alternate ECO)

2. Authority. Para 1.6.f.(3), USAG-HI Regulation 200-4

3. Purpose. To perform duties IAW the provisions of indicated authority.

4. Period. Until officially released from appointment or reassigned.

5. Special Instructions. None.

6. Point of contact is (name, telephone number).

AUTHORITY LINE:

SIGNATURE BLOCK

NOTE: For guidance on preparing and formatting the formal and/or informal memorandum cited in this appendix, see Figures 2-1 and 2-15, AR 25-50, Preparing and Managing Correspondence.

APPENDIX E-2

SAMPLE APPOINTMENT ORDERS

OFFICE SYMBOL DATE

MEMORANDUM FOR Employee Name (s)

SUBJECT: Duty Appointment (TAP/90-Day Accumulation and Storage Facility (ASF) Manager)

1. Effective this date, the following personnel are appointed as TAP/90-Day Accumulation and Storage Facility (ASF) manager and alternate manager for (*Include complete unit name*) as indicated.

   a. Name (Primary).

   b. Name (Alternate)

2. Authority. Para 1.6.c.(19), USAG-HI Regulation 200-4.

3. Purpose. To perform duties IAW the provisions of indicated authority.

4. Period. Until officially released from appointment or reassigned.

5. Special Instructions. NONE.

6. Point of contact is (name, telephone number).

AUTHORITY LINE:

SIGNATURE BLOCK

NOTE: For guidance on preparing and formatting the formal and/or informal memorandum cited in this appendix, see Figures 2-1 and 2-15, AR 25-50, Preparing and Managing Correspondence.

APPENDIX F

INSTALLATION HAZARDOUS WASTE MANAGEMENT PLAN (IHWMP) TRAINING REQUIREMENTS

Position	Activity Level	Minimum Required Training
Brigade (BDE) and/or Battalion (BN) ECO and Alternate	Major Subordinate Command Bde/Bn Level or USAG-HI Directorates/DOD Tenants that Manage Hazardous Waste/Hazardous Material	a. Environmental Compliance Officer Certification Course b. Annual Environmental Compliance Officer Refresher Course
Unit ECO and Alternate	Company/Battery/Troop-Level or Civilian Shops/Activities that Manage Hazardous Waste/Hazardous Material	a. Environmental Compliance Officer Certification Course b. Annual Environmental Compliance Officer Refresher Course c. Internal Quarterly Environmental Compliance Training by ECO d. Read and be familiar with site specific HWSSP SOP
All Personnel	Company/Battery/Troop Level or Civilian Shops/Activities that Manage Hazardous Waste/Hazardous Material	a. Internal Quarterly Environmental Compliance Training by ECO b. Read and be familiar with site specific HWSSP SOP
TAP/90-day HW Accumulation and Storage Facility Manager and Alternate	Scho Bks/East Range TAP Fort Shafter TAP Pohakuloa Training Area TAP	a. Environmental Compliance Officer Certification Course b. Annual Environmental Compliance Officer Refresher Course c. A DOD approved Transportation of Hazardous Materials Course and Biennial Refresher Course d. A 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) Training and 8-hour Annual Refresher Course

APPENDIX G

INSTALLATION TRANSFER AND ACCUMULATION POINT (TAP)/90-DAY ASF STANDING OPERATING PROCEDURE (SOP) CERTIFICATION STATEMENT

OFFICE SYMBOL DATE

MEMORANDUM FOR Hazardous Waste Program Manager, Environmental Division, Directorate of Public Works (DPW), 947 Wright Avenue, Wheeler Army Airfield, Schofield Barracks, Hawaii 96857-5013

SUBJECT: Installation Transfer and Accumulation Point (TAP)/90-day ASF Standing Operating Procedure (SOP) Certification Statement

1. This memorandum serves as a record that the following personnel have read and understood the Installation TAP/90 Day ASF SOP.

a. Name of 1st individual date signature

b. Name of 2d individual date signature

2. Point of contact for this issue is (name, telephone number).

AUTHORITY LINE:

SIGNATURE BLOCK

NOTE: For guidance on preparing and formatting the formal and/or the informal memorandum cited in this appendix, see Figures 2-1 and 2-15, AR 25-50, Preparing and Managing Correspondence.

APPENDIX H

INSTALLATION TRANSFER AND ACCUMULATION POINT (TAP)/90-DAY ACCUMULATION STORAGE FACILITY (ASF) SITE SPECIFIC SPILL CONTINGENCY PLAN CERTIFICATION STATEMENT

[Activity Letterhead (Optional)]

OFFICE SYMBOL DATE

MEMORANDUM FOR Hazardous Waste Program Manager, Environmental Division, Directorate of Public Works (DPW), United States Army Garrison, Hawaii, 947 Wright Avenue, Wheeler Army Airfield, Schofield Barracks, Hawaii 96857-5013

SUBJECT: Installation Transfer and Accumulation Point (TAP)/90-day Accumulation Storage Facility (ASF) Site Specific Spill Contingency Plan Certification Statement

1. This memorandum serves as a record that the following personnel read and understood the Installation Transfer and Accumulation Point (TAP)/90-day Accumulation Storage Facility (AFS) Site Specific Spill Contingency Plan.

a. name of 1st individual date signature

b. name of 2d individual date signature

3. Point of contact for this issue is (name, telephone number).

AUTHORITY LINE:

SIGNATURE BLOCK

NOTE: For guidance on preparing and formatting the formal and/or the informal memorandum cited in this appendix, see Figures 2-1 and 2-15, AR 25-50, Preparing and Managing Correspondence.

APPENDIX I
SAMPLE MONTHLY ENVIRONMENTAL COMPLIANCE OFFICER (ECO) UPDATE

[Activity Letterhead (Optional)]

OFFICE SYMBOL DATE

MEMORANDUM THRU Commander/Director, Unit/Activity Name and Address

FOR Chief Inspector, ECO Program ,Environmental Division, Directorate of Public Works (DPW), United States Army Garrison, Hawaii, 947 Wright Avenue, Wheeler Army Airfield, Schofield Barracks, Hawaii 96857-5013

SUBJECT: Unit/Activity Environmental Compliance Officer (ECO) update for the month of _____.

1. The following personnel are the primary and alternate ECOs for Unit/Activity:

NAME	RANK	UNIT	P/A	DEROS	PHONE NO.
a. Last, first				dd mmm yy	
b. Last, first				dd mmm yy	
c. Last, first				dd mmm yy	

2. The following personnel are no longer ECOs. Please remove them from the DPW database:

NAME	RANK	UNIT	P/A
a. Last, first			
b. Last, first			

3. The point of contact is Bn ECO name, phone number.

AUTHORITY LINE:

SIGNATURE BLOCK

NOTE: For guidance on preparing and formatting the formal and/or informal memorandum cited in this appendix, see Figures 2-1 and 2-15, AR 25-50, Preparing and Managing Correspondence.

APPENDIX J

NOTE: This SOP is provided as a sample for units/activities to use as a template when creating a site-specific SOP as required by USAG-HI Regulation 200-4. ECOs must revise this SOP to reflect their unit/activity's work processes and procedures to be considered a valid SOP.

[UNIT OR ACTIVITY HEADING]

STANDING OPERATING PROCEDURE (SOP) **DATE**
Number __#__

HAZARDOUS MATERIAL AND HAZARDOUS WASTE MANAGEMENT

1. Purpose. This Standing Operating Procedure (SOP) provides procedures for the proper management of hazardous material (HM) and hazardous waste (HW) at all [UNIT/ACTIVITY] operational areas on U.S. Army Garrison, Hawaii (USAG-HI) installations.

2. Applicability. This SOP applies to all personnel assigned to the [UNIT/ACTIVITY] who are responsible for the proper handling, storage, use, and disposal of HM and HW.

3. Scope. This SOP implements the requirements of the Resource Conservation and Recovery Act (RCRA), Subpart C, as contained in United States Army Garrison, Hawaii (USAG-HI) Regulation 200-4, Installation Hazardous Waste Management Plan (IHWMP).

4. Reference.

a. Policy Memorandum, USAG-HI-4, Environmental Compliance and Protection Program.

b. Policy Memorandum, USAG-HI-10, Environmental Policy

c. Policy Memorandum USAG-HI-19, Authorized Use List (AUL)

d. USAG-HI Regulation 200-4, Installation Hazardous Waste Management Plan (IHWMP).

e. Army Regulation (AR) 200-1, Environmental Protection and Enhancement.

f. Army Regulation (AR) 420-1, Army Facilities Management.

5. Responsibilities.

a. [UNIT/ACTIVITY] Commander/Director will:

(1) Be the overall proponent for implementing and enforcing the provisions of this SOP.

(2) Appoint a unit/activity Environmental Compliance Officer (ECO) and alternate ECO for each level of command down to the company level or equivalent and ensure they attend the ECO certification class within 30-days of this appointment and annual Refresher training thereafter.

(3) Provide adequate resources for the successful implementation of the [UNIT/ ACTIVITY] environmental compliance program.

(4) Be an active member of the Environmental Quality Control Committee (EQCC) and attend the quarterly EQCC meetings. [*Brigade Commanders and Garrison Directors only*]

(5) Correct deficiencies discovered on installation, Army, state or federal environmental compliance inspections and submit documentation of corrective actions taken as directed by the Garrison Commander.

(6) Attend, and ensure all subordinate commanders/managers attend, the USAG-HI Senior Leader Environmental Compliance Training (SLECT) course as required by Policy Memorandum USAG-HI-4.

(7) Submit an ECO/Alternate ECO update memorandum for all ECOs, down to the company level, through their higher headquarters to the DPW Environmental Division IAW USAG-HI 200-4, 1.6.f.(5) NLT the 15th day of each month. Copies of this update memorandum should be sent to the [UNIT/ACTIVITY] ECOs to be kept in their ECO Program Management Book.

(8) Ensure that the Battalions/Shops ECOs carry out their responsibilities listed in this SOP.

(9) Publicize Garrison and [UNIT/ACTIVITY] environmental policies and procedures to all personnel to ensure an effective, environmentally safe program.

b. [UNIT/ACTIVITY] Environmental Compliance Officer (ECO) and Alternate will:

(1) Serve as the unit/activity primary action officer regarding HW management and all other environmental compliance requirements.

(2) Be assigned on duty appointment orders as a primary or alternate ECO.

(3) Attend the resident Environmental Compliance Officer Certification Course within 30 days of assignment to the ECO position and maintain certificates of this training on file.

(4) Attend the Annual Environmental Compliance Officer Refresher Course prior to the expiration date on their ECO identification cards and maintain certificates of this training on file.

(5) Provide guidance and technical assistance to units/activities. Serve as liaison between the unit/activities and the DPW Environmental Division for additional assistance and guidance.

(6) Be accountable to the commander/director to execute the ECO responsibilities as prescribed in USAG-HI Reg 200-4, 1.6.g.

6. Hazardous Material Management.

a. The procurement of all hazardous materials must be accomplished IAW Policy Memorandum USAG-HI-19, Authorized Use List (AUL) which requires all units/activities to:

(1) Maintain the unit/activity 30-day AUL to ensure that it is accurate.

(2) Ensure all HM is procured through the Hazardous Materials Control Point (HMCP).

(3) Ensure all HM has a Hazardous Material Management System (HMMS) bar-code from the HMCP.

(4) Ensure no HM in the unit/activity inventory has been purchased from a source other than the HMCP without prior authorization.

(5) Ensure HM inventory does not exceed the 30-day AUL.

(6) Ensure HM expiration dates are updated.

(7) Ensure expired/excess HMs are turned in to the HMCP.

b. The management of all hazardous materials on USAG-HI installations will be IAW AR 385-10, and all applicable safety requirements as prescribed by the Directorate of Installation Safety. The ECO will conduct Hazardous Materials inspections to ensure that:

(1) HMs are properly stored and segregated. Do not store incompatible materials near each other; use Material Safety Data Sheets (MSDS) and compatibility charts (USAG-HI Reg 200-4, Appendix P) to determine which materials may be stored together.

(2) A MSDS must be present in a visible and easily accessible location for each hazardous material.

(3) Storage areas have secondary containment (i.e., concrete curbs, spill pallets, etc.) to prevent any unplanned or sudden releases into the environment.

(4) All products are used on a "First-in, First-out" basis.

(5) New products are segregated from in-use containers.

(6) Containers are not damaged or leaking. Damaged or leaking containers will be over-packed.

(7) Flammable materials are placed back into approved flammable storage cabinets at the end of each day.

(8) Materials which are transferred from their original container are transferred to a new container that is capable of safely storing the material (e.g., do not place flammables in plastic containers larger than one pint; use approved metal containers instead). New containers holding transferred materials are properly marked and labeled (i.e., chemical name, manufacturer, national stock number, Military Specification, etc.).

(9) Required personal protective equipment items shall be available for all hazardous material handlers IAW MSDSs.

7. Hazardous Waste Minimization (HAZMIN).

a. HAZMIN is defined as efforts undertaken during the year to reduce the volume and toxicity of waste generated, and the changes in volume and toxicity of waste actually achieved during the year in comparison with the previous year.

b. HAZMIN methods. There are several methods available to minimize the amount of wastes that are generated.

(1) Inventory control. Hazardous materials will only be ordered through the HMCP according to the amount required during a 30-day period as reflected by the AUL. The purchase of HM outside of the HMCP is prohibited without proper authorization. The use of household HM not listed on the AUL on USAG-HI industrial operations is prohibited.

(2) Waste segregation. Recyclable materials will be properly segregated to increase their reclamation potential.

(3) Product substitution. Less hazardous or non-hazardous products will be used in place of HM whenever possible.

(4) Material handling improvements. HM will be stored in the most logical allowable location to minimize the excessive handling which will reduce the risk of accidental spills.

(5) Recycling. Recycling is mandatory for all [UNIT/ACTIVITY] personnel. All recyclable materials will be recycled to the fullest extent possible. Regular inspection of refuse containers will be conducted to ensure that recyclable materials (e.g. cardboard, metal, beverage containers, office paper, toner cartridges) are not discarded. Contact the Army Recycling Center located at SB 1087 McMahon Road, 655-0011 for operating hours to drop off recyclable materials.

8. Hazardous and Non-Regulated Waste Streams.

a. Hazardous Waste Streams. [*In the space below list each Hazardous Waste stream. Describe each process that generates a waste, the Hazardous Material(s) that is used in the process, the waste that is generated, and how it is managed. If no Hazardous Waste is generated, then state that "No Hazardous Waste is generated as a result of the established work processes at this facility. In the unlikely event that a Hazardous Waste is generated due to a spill, release, contamination, deterioration or expiration of a Hazardous Material, it will be managed in accordance with the procedures established in the Hazardous Waste Shop Storage Point (HWSSP) section (9) below.*]

(1) [*Name of HAZARDOUS WASTE, Example: hazardous waste methyl ethyl ketone (MEK) rags*]

(2). [*Process Generating Waste. Example: Cleaning OH-58 Rotor Blades after de-taping process.*]

(3) [*Hazardous Materials Used. Example: Methyl Ethyl Ketone (MEK)*]

b. Non-Regulated Waste Streams. [*In the space below list each Non-Regulated Waste stream. Describe each process that generates a waste, the Hazardous Material(s) that is used in the process, the waste that is generated, and how it is managed.*]

(1) [*Name of Non-Regulated Waste, Example: used petroleum oil lubricant (POL) rags*]

(2) [*Process Generating Waste. Example: General Ground Vehicle Maintenance*]

(3) [*Hazardous Materials Used. Example: POL products include engine/gear oil, hydraulic fluid, transmission fluid, grease and JP-8*]

9. Hazardous Waste Shop Storage Point Procedures (HWSSP).

a. General. The [UNIT/ACTIVITY] HWSSP will be managed IAW USAG-HI Reg 200-4, Chapter 4.

b. Equipment. The HWSSP consists of one polypack container located at [LOCATION], identified by one metal DANGER-HWSSP sign (USAG-HI Reg 200-4, Appendix T). The HWSSP will be secured at all times except when adding, removing or inspecting the waste stored inside. No personnel shall place any items in the HWSSP without first contacting the ECO or the DPW Environmental Division for guidance.

c. Hazardous Waste Determination. Before placing any waste in the HWSSP, the ECO must determine what the waste is and whether it is regulated as a hazardous waste. All HW at the [UNIT/ACTIVITY] operational area must be stored in the HWSSP as soon as it has been determined to be a HW.

d. Segregation of wastes. Incompatible wastes should never be stored together (in the same polypack). Improper storage may result in a potentially dangerous chemical reaction. Check the compatibility chart located at USAG-HI Reg 200-4, Appendix P to determine whether or not two wastes may be stored together (in the same polypack). Never mix two wastes in one drum.

e. Marking/Labeling. All HW must be marked with a HW label or the words "HAZARDOUS WASTE" and the type of waste it is (e.g., paint thinner). Do not place the accumulation start date on this label. The accumulation start date should only be filled in when a HWSSP exceeds 55 gallons of HW or 1 quart of acutely HW. Department of Transportation (DOT) hazard labels will be placed on each drum/waste item in accordance with the hazard (e.g., Corrosive, Flammable Liquid, Oxidizer, etc.).

f. Accumulation Logs. The USAG-HI Form 33, SSP/TAP/90-Day ASF Hazardous Waste Collection Log provided at USAG-HI Reg 200-4, Appendix N will be used to document the type and amount of waste added to the HWSSP. One copy of the accumulation log will be kept inside the polypack and one copy will be kept in another readily available location (i.e., an office at the motorpool, etc.). Both copies must be kept current to provide accurate information in the case of emergency.

g. Material Safety Data Sheets (MSDS). One copy of the MSDS or laboratory analysis for each waste will be kept inside the polypack and one copy will be kept in another readily available location (i.e., an office at the motorpool, etc.).

h. Bonding and Grounding. Drums containing flammable liquids must be properly grounded by connecting the drum and the grounding point with a stranded copper or carbon steel cable. When transferring flammable liquids between containers, the containers must be bonded (connected) together with a stranded copper or carbon steel cable. See the diagram at USAG-HI Reg 200-4, Appendix W.

i. A spill kit containing the following items must be kept on-site: (Quantities listed in parenthesis are minimums)

(1) Granular absorbent (50 pounds).

(2) Absorbent pillows, five (5) each, or pads, bundle of one hundred (100) each.

(3) Straight edge, non-sparking shovel or dustpan (1).

(4) Empty over-pack drum to accommodate largest storage container, e.g., 30 gallon over pack for 15 gallon accumulation drum, one (1) each.

(5) Broom, one (1) each.

(6) Rubber gloves, two (2) pair.

(7) Rubber apron, two (2) each.

(8) Rubber boots, two (2) pair.

(9) Goggles, two (2) pair.

(10) Absorbent booms, two (2) each, eight (8) or ten (10) feet long.

10. Transfer of HW to the Transfer and Accumulation Point (TAP).

a. When the [UNIT/ACTIVITY] has generated a hazardous waste, they will call DPW TAP Manager/Alternate at 656-0866 to transfer the waste to the TAP.

b. The ECO must ensure that they have two copies of the correct MSDS for the HW. If the waste is unknown or requires a laboratory analysis, contact the DPW TAP for assistance.

c. Prior to transferring wastes DPW Waste Handler will conduct a pre-transfer inspection of the waste to ensure a proper waste determination has been made, the waste is properly packaged and labeled for transportation. After all documentation and packaging has been completed, a pickup will be scheduled.

d. The ECO must retain copies of all HW transfer documentation/receipts for three years.

e. *In cases where the HW accumulated at the Hazardous Waste Shop Storage Point (HWSSP) is in excess of the 55 gallon hazardous waste/one quart acutely hazardous waste allowable limit*, the ECO will immediately annotate the date that the limit was exceeded as the Accumulation Start Date on the HW label. The generator will also immediately contact the DPW TAP Manager/Alternate and request to have the waste transferred to the [INSTALLATION] TAP within 72 hours.

f. Wastes generated on Army Installations/Training Areas not "at or near" the unit/activity/ directorate HWSSP.

(1) ECOs must contact the DPW TAP Manager to establish procedures for managing hazardous waste generated during field training exercises and/or other activities on the installation, but not "at or near" the HWSSP. Non-hazardous waste generated from these activities will be containerized and transported back to the unit/activity in accordance with DOT regulations for final disposition.

(2) If wastes (orphan drums) are generated on an installation that does not have a TAP, the ECO will immediately notify the DPW, Environmental Division for recommended actions.

(3) Hazardous Wastes from unknown sources shall not be transported to the HWSSP. These wastes will be transported to the installation Transfer and Accumulation Point for waste characterization and proper disposal. The unit/activity discovering the containers will immediately contact the DPW TAP at **656-0866**.

(4) Any questions on unknowns should be directed to the DPW, Environmental Division Emergency Spill Line @ 656-1111.

11. Recyclable Material Shop Storage Point (RMSSP) Procedures.

a. General. The RMSSP is used for the accumulation of recyclable materials (e.g., used oil, transmission or power steering fluid, diesel, synthetic oil, antifreeze, gasoline) and storage of Non-Regulated wastes. Recyclable materials will be stored at the RMSSP in DOT/POP approved 55 gallon steel drums and removed by a DPW contractor on a monthly schedule.

b. Segregation of recyclables. Never mix recyclable materials in the same drum. Recyclable materials will be segregated as indicated in section e. below.

c. Security. Drum bungs or rings will be wrench-tightened and the RMSSP will be locked at all times when recyclable material is not being added to the drums.

d. Signage. RMSSPs will be identified on the front by a 28" x 35" IAW USAG-HI 200-4, 4.13.e. It is imperative that the most current Primary and Alternate ECO names and phone numbers are listed on the RMSSP sign to ensure that the DPW contractor can access the RMSSP for service.

e. Labeling. Drums will be color-coded around the middle third of the drum and labeled appropriately as stated below:

2" BLACK LETTERING	**BAND COLOR**
USED OIL ONLY	Red
ASBESTOS-DANGER INHALATION HAZARD	White
USED ANTIFREEZE ONLY	Green
USED JP-8/DIESEL ONLY	Yellow
USED MOGAS	Fluorescent Orange

Drums containing materials meeting the definition of any of the DOT hazard classes will be labeled with the appropriate DOT hazard label (e.g., MOGAS will be labeled with the "Flammable Liquid" label).

f. Accumulation Logs. USAG-HI Form 31, RMSSP/NRW Collection Log, provided at USAG-HI Reg 200-4, Appendix X will be used to document the type and amount of recyclable material added to a drum in the RMSSP. One form should be used for each accumulation drum. One copy of the accumulation log will be kept inside the RMSSP and one copy will be kept in another readily available location (i.e., an office at the motorpool, etc.). Both copies *must* be kept current to provide *accurate* information in the case of emergency.

g. Material Safety Data Sheets. One copy of the MSDS for each recyclable waste will be kept inside the RMSSP and one copy will be kept in another readily available location (i.e., an office at the motor pool, etc.).

h. Bonding and Grounding. Drums containing flammable liquids must be properly grounded by connecting the drum and the grounding point with a stranded copper or carbon steel cable. When transferring flammable liquids between containers, the containers must be bonded (connected) together with a stranded copper or carbon steel cable. See the diagram at Appendix W, USAG-HI Reg 200-4.

i. Turn-in of Recyclable Materials. A scheduled pick up of recyclable materials by the contractor will be conducted on a monthly basis. Contact the DPW Contracts Branch at 656-2419 for the scheduled pickup time.

j. Turn-in of Non-Regulated Waste (used dry sweep/used rags). Used dry sweep and used rags accumulated from maintenance on service machinery will be turned-in to the TAP for disposal as non-regulated waste IAW the following procedures:

(1) Prior to transfer, place used rags/absorbent pads in 10-gallon, clear plastic bags and store the bags in a closed metal container.

(2) Used dry sweep must be stored in closed, open head metal drums.

(3) Used dry sweep and used rags/pads must not be beyond saturation to the point that there is free-flowing liquid in the bag. Saturated rags must be managed separately. Contact the TAP/90-day ASF manager/alternate for guidance on managing saturated POL rags/pads.

(4) Affix non-regulated waste label on drum and mark the label with the words "USED DRY SWEEP" or "USED RAGS/PADS".

(5) Call DPW for pickup at 656-0866. The TAP/90-day ASF manager/ alternate will transfer the bags of rags/pads from the collection drums to a portable container for transportation to the TAP. The unit/activity will retain possession of the drum used to collect the rags/pads for future use. Used POL Dry Sweep must be picked up in a collection drum provided by the unit/activity. Used POL Dry Sweep drums will not be returned to the unit/ activity.

k. A spill kit containing the following items must be kept on-site: (Quantities listed in parenthesis are minimums)

(1) Granular absorbent in new dry-sweep container with lid (50 pounds).

(2) Absorbent pillows, five (5), or pads, bundle of one hundred (100) each.

(3) Straight edge, non-sparking shovel or dustpan, one (1) each.

(4) Broom, one (1) each.

(5) Used dry sweep container with lid, one (1) each.

(6) Rubber gloves, two (2) pair.

(7) Rubber boots, two (2) pair.

(8) Absorbent booms, two (2) each, eight (8) or ten (10) feet long.

(9) Drum puncture repair paste, one (1) can or tube.

(10) Empty over-pack drum to accommodate largest storage container, e.g., 85 or 95 gallon over pack for 55 gallon accumulation drum, one (1) each.

12. Universal Waste (UW) Management.

a. General. Examples of universal waste generated at [UNIT/ACTIVITY] include UW batteries and UW lamps.

b. UW batteries. All used batteries with the exception of alkaline batteries, will be managed as UW batteries. Examples of UW batteries generated on USAG-HI installations include, but are not limited to Lead-Acid, Lithium-Sulfur Dioxide, Lithium-Manganese Dioxide, Lithium Thionyl Chloride, Magnesium, Nickel-Cadmium, and Nickel-Metal Hydride batteries.

(1) A battery becomes a UW battery as soon as it has been determined that it can no longer be used for its intended purpose. Once this has been determined, the battery must be managed as a UW battery IAW paragraph 4.10, USAG-HI Reg 200-4.

(2) Any battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container must be managed and disposed as HW.

(3) Non-rechargeable lithium batteries outfitted with a complete discharge device (CDD) will not be discharged. DO NOT ACTIVATE THE CDD. Tape the CDD and exposed terminals, place in a plastic bag and then inside a sturdy cardboard box that is marked/labeled as indicated below. The ECO will provide an itemized list of the amount and type of batteries (i.e. BA 5590, BA 5800) and a statement certifying that the lithium batteries are of the balanced type.

(4) All UW batteries must be clearly marked/labeled ``Universal Waste-Battery (ies)'' or "Used Battery (ies) and with the Accumulation Start Date (ASD) (the date the item was taken out of service). If the batteries are stored in a box/container, the box/container must be marked/labeled when the first quantity of waste is generated for that specific container. For larger batteries that will be stored separately, each battery must be marked and/or labeled.

(5) Lead-acid vehicle batteries must be individually marked/labeled "Used Battery" and with the date the battery was determined to be a UW. The batteries must be stored with secondary containment and overhead protection.

(6) A UW Collection Log must be maintained to show the dates, quantities and disposition of the UW.

c. Universal Waste Lamps. Most facilities on USAG-HI installations have their lamps changed by DPW who will manage the Universal Waste Lamps. If a lamp is changed by the unit, the lamps must be managed as a UW lamp IAW USAG-HI Reg 200-4, 4.10.

(1) UW lamps must be stored in closed containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps.

(2) The ECO must immediately clean up and place in a container any lamp that is broken and any lamp that shows evidence of breakage, leakage, or damage that could cause the release of mercury or other hazardous constituents to the environment. These lamps must be managed as HW.

(3) Each lamp or a container or package in which such lamps are contained must be labeled or marked clearly with the following phrase: ``Universal Waste-Lamp(s)" and the ASD must be annotated on the container when the first quantity of waste is generated (the date the item was taken out of service) for that specific container.

(4) A UW Collection Log must be maintained to show the dates, quantities and disposition of the UW.

d. Accumulation Time Limits.

(1) The units/activities that generate UW must turn-in the waste to the appropriate TAP or authorized contractor within 6 months of the ASD.

(2) For UW Lamps the units/activities can accumulate no more than one hundred and fifty (150) of any type of spent lamps or for no more than 6 months from the ASD.

e. On Post Transfer of UW to the TAP.

(1) Contact the appropriate TAP/90-day ASF manager/alternate for pre-inspection to ensure that all packaging, marking, and labeling requirements were met.

(2) Provide, complete, and/or sign the following documents that are required from the generator, e.g., MSDS and/or UW Collection Log. Maintain UW documentation on file for three years.

13. Spill Response.

a. Personnel will take immediate personnel protective measures. Within 5 minutes thereof, notify the DPW Environmental Division at 656-1111. This number will be posted on a bulletin board in the work areas were hazardous materials/waste are stored.

b. The unit will designate a spill response coordinator and an alternate (usually the ECOs) that will be responsible for spill response and reporting. The spill response coordinators will be identified to all personnel in the work area and on bulletin boards. The [UNIT/ACTIVITY] spill response coordinators are:

(1) Name, Phone Number

(2) Name, Phone Number

c. Points of contact for assistance within the DPW Environmental Division are listed below.

Title	Phone Number
Chief, Compliance Branch	656-5301
Storm Water and Waste Water	656-3105
Hazardous Waste	656-7001
Air Pollutants	656-5301
Tank Releases	656-5301

d. Initial Spill Response Actions. The following initial defensive actions shall be implemented as necessary upon discovery of a spill:

(1) Evacuate the area of non-essential personnel and direct personnel to notify DPW Environmental (656-1111), the Military Police (911), and Fire Department (911).

(2) Summon emergency medical services if personnel are injured.

(3) Remove ignition sources (cigarettes, torches, etc.) and turn off electric power in the case of a flammable spill to minimize fire hazards.

(4) Ventilate the area in the case of the presence of volatile materials or dense vapors spilled inside a building.

(5) Stop flow of material, *if it is safe to do so*, by plugging the leak, activating any emergency shut offs, reorienting the container, placing the container in a drip pan, placing the container in an over-pack container, or using any other expedient method available.

(6) Contain spilled material to keep spill from spreading and flowing beyond the immediate area or into drains, by using plugs, mats, absorbents, spill booms, or any other expedient method available.

(7) As the spill area is isolated, the "hot zone" should be expanded in a DOWNWIND DIRECTION, paying particular attention to sensitive populations (e.g., schools, child-care center, medical facilities, etc.) if spilled materials are volatile, or there is a short-term danger if material is inhaled.

e. Initial Notification Procedures. The person discovering the spill shall report it immediately to the organization's designated spill response coordinator, who will immediately notify DPW Environmental. The Military Police and/or the Fire Department shall be contacted if there is a threat of fire, danger to public health, or it could affect a sensitive environmental area (such as entering a water body). The [UNIT/ACTIVITY] spill response coordinator will submit a completed USAG-HI Spill Notification Form to the DPW Environmental Division as soon as possible.

13. Point of Contact. Questions regarding the procedures in this SOP should be directed to [ECO NAME, BUILDING/OFFICE NUMBER, PHONE NUMBER].

Encl
Abbreviations, Acronyms and Terms

SIGNATURE BLOCK (Printed Name, Unit Cdr)
GRADE, CONTROL BRANCH (e.g., CPT, IN)
Title (e.g., Commanding)

Enclosure 1: ABBREVIATIONS, ACRONYMS and TERMS

AR.	Army Regulation.
ASD	Accumulation Start Date.
AUL.	Authorized Use List.
CDD	Complete Discharge Device
DOT.	Department of Transportation.
DPW.	Directorate of Public Works.
ECIC.	Environmental Compliance Inspection Checklist.
ECO.	Environmental Compliance Officer.
e.g.	An editorial symbol to signify, "Such As"
EQCC	Environmental Quality and Control Committee
Etc.	Etcetera.
HAZMIN.	Hazardous Waste Minimization.
HM	Hazardous Material
HMCP	Hazardous Materials Control Point
HMMS.	Hazardous Material Management System.
HMSP.	Hazardous Materials Storage Point.
HSMS.	Hazardous Substance Material System.
HW.	Hazardous Waste.
HWSSP	Hazardous Waste Shop Storage Point.
IAW.	In Accordance With.
i.e.	An editorial symbol to signify "That Is"
MEK.	Methyl Ethyl Ketone.
MSDS.	Material Safety Data Sheet.
MOGAS.	Motor Gasoline.
POL.	Petroleum Oil Lubricants.

PPE. Personal Protective Equipment.

RCRA Resource Conservation and Recovery Act

RMSSP. Recyclable Material Shop Storage Point.

SLECT Senior Level Environmental Compliance Training

SOP. Standard Operating Procedure.

TAP Transfer Accumulation Point

USAG-HI United States Army Garrison, Hawaii.

UW. Universal Waste

WAAF. Wheeler Army Airfield.

Special Terms Found In This SOP

Accumulation Start Date. The date that any hazardous waste or material is placed in prescribed storage containers in hazardous waste storage points.

Activity. When used in this SOP, refers to an organization element below the company level, e.g., a shop, motor pool, etc., in a TO&E organization, or a Branch or shop below the Directorate level in a TDA organization.

Alternate. When used in this SOP, refers to the Alternate Environmental Compliance Officer (ECO)

Etcetera. "And other unspecified things of the same class." "And so forth."

Empty Container. A container or inner liner removed from a container that held a HM that is regulated as a HW, or a container or inner liner removed from a container that was used to store a HW is empty if:

a. All wastes have been removed that can be removed using the practices commonly employed to remove materials from that type of container, (e.g., pouring, pumping, aspirating) and no more than 2.5 centimeters (1 inch) of residue remain on the bottom of the container or inner liner.

b. Pressurized Containers. A pressurized container which has reached atmospheric pressure (i.e., all product under pressure has been expelled) is considered empty and may be disposed of as normal trash.

c. Listed Toxic and Acute Hazardous Product Containers. A listed toxic and acute hazardous product container (toxic and acute HW, listed at 40 CFR, section 261.31 to 261.33) must either be triple rinsed or crushed and over-packed for disposal through the Defense Reutilization and Marketing Office, Hawaii (DRMO-HI). Any rinsate occurring from triple rinsing will also be managed as a HW.

Generator. The unit/activity/person whose act or process produces HW.

Hazardous Material (HM). Any material which because of its quantity, concentration, physical, or chemical characteristics may pose a substantial hazard to human health or the environment when transported in commerce, stored, or otherwise managed. HM are normally accompanied by Material Safety Data Sheets (MSDSs).

Hazardous Waste (HW). A HW is defined as any waste, be it solid, liquid, or contained gas that may pose a hazard to human health or may pollute the environment due to its quantity, concentration, or characteristics. A hazardous material becomes a HW when it is no longer useable for its intended purpose and must be discarded. A waste is a hazardous waste if it contains one or more of the following characteristics:

a. Ignitability. A solid waste that is a liquid, having a flashpoint below 140 F as defined in 40 CFR 261.21. A solid waste that is an ignitable compressed gas as defined in 49 CFR 173.300 or an oxidizer as defined in 49 CFR 173.151. Ignitable wastes are assigned the EPA waste code D001 (e.g., waste paint, paint thinner, hydrogen peroxide, etc.).

b. *Corrosivity.* Having a Ph less than or equal to 2, or greater than or equal to 12.5, as determined by a Ph meter. Corrosive wastes are assigned the EPA waste code D002 (e.g., battery acid, caustic cleaners, etc.).

c. Reactivity. A material that is normally unstable and readily undergoes violent change without detonating, or that reacts violently with water. Reactive wastes are assigned the EPA waste code D003 (e.g., obsolete ammunition, MRE heaters, explosives, etc.).

d. Toxicity. Extract of the waste fails the Toxic Characteristic Leaching Procedure (TCLP), using specified test methods, that equals or exceeds the concentration of contaminants listed and may release toxic substances or cause a poison hazard to human health or the environment. Toxic wastes are assigned EPA waste codes varying from D004 through D043.

Hazardous Waste Shop Storage Points (HWSSPs). Point at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste. A generator may accumulate as much as 55 gallons of hazardous waste or 1 quart of acutely hazardous waste listed in 40 CFR section 262.34©(1).

Listed Wastes (Toxic and Acute Hazardous Wastes): Known substances which affect the proper functions of a human organism, where prolonged exposure may result in death (e.g., methyl ethyl ketone (MEK), trichloroethylene (TCE), lindane). These wastes are listed at 40 CFR, section 261.31 to 261.33.

Petroleum, Oil, Lubricant (POL) Products. Include, but are not limited to, petroleum based oil, MOGAS, JP-8, diesel fuel, kerosene, fuel oil, antifreeze, hydraulic fluid (OHA), grease, and (sludge).

Transfer and Accumulation Point (TAP). The ninety day (90-day) temporary storage area for HW and non-hazardous wastes pending disposal through DRMO-HI or other channels.

Unit, When used in this SOP, refers to a Company, Battalion, or Brigade-level of command in a TO&E organization, or a Directorate level of command in a TDA organization.

Waste Stream. The process through which the waste is/was generated.

APPENDIX K

SAMPLE HAZARDOUS WASTE SOP CERTIFICATION STATEMENT FORMAT

[Activity Letterhead (Optional)]

OFFICE SYMBOL DATE

MEMORANDUM THRU Commander/Director, Unit Activity Name, Address

FOR Hazardous Waste Program Manager, Environmental Division, Directorate of Public Works (DPW), United States Army Garrison, Hawaii, 947 Wright Avenue, Wheeler Army Airfield, Schofield Barracks, Hawaii 96857-5013

SUBJECT: Unit/Activity Name Hazardous Waste Standing Operating Procedure (SOP) Certification Statement

1. This memorandum serves as a record that the following personnel have read and understood the Unit/Activity Name Hazardous Waste SOP:

a. name of 1st individual date signature

b. name of 2d individual date signature

3. The point of contact for this issue is BN ECO name, phone number.

AUTHORITY LINE:

SIGNATURE BLOCK

NOTE: For guidance on preparing and formatting the formal and/or the informal memorandum cited in this appendix, see Figures 2-1 and 2-15, AR 25-50, Preparing and Managing Correspondence.

APPENDIX L

RECORD OF ECO INTERNAL QUARTERLY TRAINING MEMORANDUM

(OFFICE SYMBOL) (DATE)

MEMORANDUM FOR RECORD

SUBJECT: Unit Internal Quarterly Environmental Compliance Training for the ____Quarter, FY ____

1. Internal Environmental Compliance Training is conducted on a quarterly basis during the following intervals of the Fiscal Year:

a. 1st Quarter: October, November, December.

b. 2nd Quarter: January, February, March.

c. 3rd Quarter: April, May, June.

d. 4th Quarter: July, August, September

2. On _____(DATE)____the ____(UNIT NAME)_____received training in the following areas:

a. Hazard Communication:

(1) Location of the hazardous communications (HAZCOM) Station.

(2) *Material Safety Data Sheets* (MSDS): need MSDS for all HM in inventory, MSDS location, guidance on how to read MSDS.

(3) HM Labeling: guidance on how to read label, ensure HM containers are properly labeled

b. Hazardous Materials (HM) Management:

(1) MSDS must be present for each HM.

(2) Proper storage/segregation of HM: e.g. flammable materials in flammable lockers.

(3) HM containers: inspect containers to ensure they are in good condition, within shelf life.

(4) Separate new/in-use containers, "first-in, first-out" procedure, ensure no excess HM in inventory.

(5) Immediately report damaged/leaking HM, excess HM, unauthorized HM to ECO

(6) Personal protective equipment (PPE): proper PPE and adequate amounts must be available for all HM handlers.

(OFFICE SYMBOL)
SUBJECT: Unit Internal Quarterly Environmental Compliance Training for the ___ Quarter FY ___

(7) Paint management: used aerosol paints must be placed in accumulation container.

(8) Used oil containers must be labeled "USED OIL."

(9) Ensure ALL non-alkaline batteries are turned-in to the ECO to be managed as "UNIVERSAL WASTE."

(10) Ensure ALL fluorescent light bulbs are turned-in to the ECO to be managed as UNIVERSAL WASTE.

c. Hazardous Waste Management:

(1) Hazardous waste determination is made by the ECO.

(2) Immediately contact the ECO if a HM is no longer usable for its intended purpose.

(3) All HW must be stored in the HWSSP.

(4) Never place anything in the HWSSP without the ECO's knowledge.

(5) ECO must conduct weekly inspection of the Hazardous Waste Shop Storage Point(s) (HWSSP).

(6) NEVER dispose of HM/HW in the dumpster.

d. Hazardous Waste Minimization (HAZMIN):

(1) Inventory control: control inventory to minimize expired, excess and unusable HM.

(2) Waste segregation: properly store recyclable materials (e.g. in RMSSP) to prevent HW generation.

(3) Product substitution: use less hazardous/non-hazardous products as much as possible.

(4) HM handling: proper storage/handling of HM minimizes spills/accidents.

(5) Recycling: proper management of used POL products to ensure they can be recycled.

(6) Ensure proper management of Flameless Ration Heaters (FRH) for MREs: use to heat MRE or collect and turn-in to HMCP.

e. Spill Contingency Procedures:

(1) Spill Prevention: Proper utilization of drip pans and absorbent pads.

(OFFICE SYMBOL)
SUBJECT: Unit Internal Quarterly Environmental Compliance Training for the ___ Quarter FY ___

(2) Discuss storage areas/processes that have the greatest potential for spills (material and waste).

(3) Utilization of secondary containment.

(4) Spill Response: immediate action procedures, emergency alarm procedures.

(5) The Unit Spill Plan Site Map (to include evacuation routes, emergency phone numbers).

(6) Spill Reporting procedures and form: Call DPW Emergency Environmental Spill Line: 656-1111.

f. Aboveground Storage Tanks (AST):

(1) 55-gallon drum is an AST.

(2) Inspect piping, fittings for corrosion and leaks.

(3) Inspect secondary containment for leaks, storm water accumulation.

(4) Immediately report any deficiencies to the ECO.

g. Oil Water Separator (OWS) [Wash Rack]:

(1) Use high-pressure washers with water only whenever possible.

(2) When using detergents, use only those approved for use with the OWS.

(3) Ensure drains are not clogged and all grates are in place.

(4) Do not pour hazardous materials (e.g. acids, antifreeze, and solvents) in the floor drains or wash rack.

(5) Clean floors using dry sweep only and collect in used dry sweep container.

3. A list of attendees/sign-in sheet is attached.

4. The Instructor for this training was ___Full Name and Rank when applicable____.

5. POC for this memorandum is ___Name____at telephone number _____.

SIGNATURE BLOCK
GRADE, CONTROL BRANCH (e.g., C PT, IN)
Title (e.g., Commanding)

ORGINIZATIONAL NAME/TITLE)

ATTENDANCE RECORD
INTERNAL QUARTERLY ENVIRONMENTAL COMPLIANCE TRAINING

DATE:_____**QTR FY**_____

INSTRUCTOR:_____

TOPICS COVERED: HAZARD COMMUNICATION, HAZARDOUS MATERIAL/WASTE MANAGEMENT, HAZARDOUS WASTE MINIMIZATION, SPILL CONTINGENCY PROCEDURES, ABOVEGROUND STORAGE TANKS, OIL/WATER SEPARATOR

PRINT NAME (LAST, FIRST)	RANK	SIGNATURE

APPENDIX M: USAG-HI Form 28, Manifest Log

MANIFEST LOG

The USAG-HI proponent for this form is the Directorate of Public Works

DATE ISSUED	MANIFEST NUMBER	DELIVERY ORDER	COMPANY	DATE SIGNED	35 DAYS	FINDINGS	45 DAYS	EPA NOTIFIED	DATE RETURNED	DATE OF CD

USAG-HI Form 28, Oct 08 (This form replaces USAG-HI Form VG-GW-01-08-R-E, Feb 01, which is obsolete)

APPENDIX N

SSP/TAP/90-DAY ASF HAZARDOUS WASTE COLLECTION LOG

The USAG-HI proponent for this form is the Directorate of Public Works

ACTIVITY/COMMAND: _____
BUILDING NO. /INSTALLATION: _____
PRIMARY WASTE BEING COLLECTED: _____
CONTAINER SIZE/ID. NO.: _____
PROCESS GENERATING WASTE: _____

DATE	ITEM POURED	QTY POURED/ DEPOSITED		PRINT NAME	SIGNATURE
		GAL/WT	TOTAL		

I CERTIFY THAT I HAVE EXAMINED AND AM FAMILIAR WITH THE WASTE THROUGH ANALYSIS AND TESTING OR THROUGH COLLECTION PROCEDURES FOR THE WASTE TO SUPPORT THIS CERTIFICATION. I CERTIFY THAT ALL INFORMATION SUBMITTED IS ACCURATE AND THAT I HAVE PROPERLY IDENTIFIED THE WASTE.

PRINT NAME	SIGNATURE

USAG-HI Form 33, Oct 08 (This form replaces 25th ID (L) & USARHAW Form VG-GW-01-02-R-E, Feb 02, which is obsolete)

APPENDIX O

TRANSFER AND ACCUMULATION POINT INVENTORY LOG

The USAG-HI proponent for this form is the Directorate of Public Works

Page___ of___

MONTH: _____

BUILDING NO/INSTALLATION: _____

NAME/TELEPHONE NUMBER OF ACCUMULATION POINT MANAGER: _____

Date Rec'd	Total Quantity (gallons/pounds)	Total Containers (ID Numbers)	Hazardous Waste TYPE	Activity Turning-In Waste	Date Transported

USAG-HI Form 27, Oct 08 (This form replaces USAG-HI Form VG-GW-01-06-R-E, Feb 01, which is obsolete)

APPENDIX P

EPA'S CHEMICAL COMPATIBILITY CHART, EPA-600/2-80-076

EPA's Chemical Compatibility Chart

EPA-600/2-80-076 April 1980

A METHOD FOR DETERMINING THE COMPATIBILITY OF CHEMICAL MIXTURES

Please Note: This chart is intended as an indication of some of the hazards that can be expected on mixing chemical wastes. Because of the differing activities of the thousands of compounds that may be encountered, it is not possible to make any chart definitive and all inclusive. It cannot be assumed to ensure compatibility of wastes because wastes are not classified as hazardous on the chart, nor do any blanks necessarily mean that the mixture cannot result in a hazard occurring. Detailed instructions as to hazards involved in handling and disposing of any given waste should be obtained from the originator of the waste.

CODE	CONSEQUENCE
H	Heat Generation
F	Fire
G	Innocuous and non-flammable gas generation
GT	Toxic Gas formation
GF	Flammable Gas formation
E	Explosion
P	Violent Polymerization
S	Solubilization of toxic substance
U	May be hazardous, but Unknown

#	REACTIVITY GROUP NAME
1	Acids, Mineral, Non-oxidizing
2	Acids, Mineral, Oxidizing
3	Acids, Organic
4	Alcohols and Glycols
5	Aldehydes
6	Amides
7	Amines, Aliphatic and Aromatic
8	Azo Compounds, Diazo Compounds and Hydrazines
9	Carbamates
10	Caustics
11	Cyanides
12	Dithiocarbamates
13	Esters
14	Ethers
15	Fluorides, Inorganic
16	Hydrocarbons, Aromatic
17	Halogenated Organics
18	Isocyanates
19	Ketones
20	Mercaptans and Other Organic Sulfides
21	Metals, Alkali and Alkaline Earth, Elemental
22	Metals, Other Elemental & Alloys as Powders, Vapors, or Sponges
23	Metals, Other Elemental & Alloys as Sheets, Rods, Drops, etc.
24	Metals and Metal Compounds, Toxic
25	Nitrides
26	Nitriles
27	Nitro Compounds, Organic
28	Hydrocarbons, Aliphatic, Unsaturated
29	Hydrocarbons, Aliphatic, Saturated
30	Peroxides and Hydroperoxides, Organic
31	Phenols and Cresols
32	Organophosphates, Phosphothioates, Phosphodithioates
33	Sulfides, Inorganic
34	Epoxides
101	Combustible and Flammable Materials, Miscellaneous
102	Explosives
103	Polymerizable Compounds
104	Oxidizing Agents, Strong
105	Reducing Agents, Strong
106	Water and Mixtures Containing Water
107	Water Reactive Substances

APPENDIX Q

WEEKLY TAP/90 DAY ASF INSPECTION LOG

DATE:	AREA/BLDG:	SIGNATURE OF INSPECTOR(S):	INSPECTOR(S):
DATE:	AREA/BLDG:	SIGNATURE OF INSPECTOR(S):	INSPECTOR(S):

ITEM		WEEK 1 Date/Time	WEEK 2 Date/Time	WEEK 3 Date/Time	WEEK 4 Date/Time	WEEK 5 Date/Time	LOCATION AND PROBLEM OBSERVED	DATE & NATURE OF CORRECTIVE ACTION
SAFETY AND EMERGENCY EQUIPMENT	POTENTIAL PROBLEM(S) TO LOOK FOR:	**S**-SAT **U**-UNSAT **NA**-NOT APPL	**S**-SAT **U**-UNSAT **NA**-NOT APPL	**S**-SAT **U**-UNSAT **NA**-NOT APPL	**S**-SAT **U**-UNSAT **NA**-NOT APPL	**S**-SAT **U**-UNSAT **NA**-NOT APPL		
Face shield & chemical goggles	Broken, dirty or missing, etc.							
Protective clothing	Holes, worn, missing, etc.							
Empty drums/containers	Corrosion, structural damage, securely stored, etc.							
Emergency eyewash/shower	Low water pressure, leaking, flushed, etc.							
Nonsparking bung wrench	Missing, damaged							
Push broom	Missing, damaged							
Hose and Hose Bib	Low water pressure, inoperable condition							
Nonsparking shovel	Missing, damaged							
Fire Extinguishers	Not charged, not mounted, missing, etc.							
First aid equipment & supplies	Items out of stock, outdated, expired supplies							
SPILL CLEAN UP & CONTAINMENT EQUIPMENT	POTENTIAL PROBLEM(S) TO LOOK FOR:						LOCATION AND PROBLEM OBSERVED	DATE & NATURE OF CORRECTIVE ACTION
Spill kit								
3 bags absorbent material	Insufficient stock, unserviceable condition (reorder)							
2 bags/50 ea melt blown poly propylene pads	Insufficient stock, unserviceable condition (reorder)							
16 ea/3" X 48" socks	Insufficient stock, unserviceable condition (reorder)							
10 ea/3" X 10' socks	Insufficient stock, unserviceable condition (reorder)							
8- ea pillows/16" X 20"	Insufficient stock, unserviceable condition (reorder)							
20 ea absorbent wipes	Insufficient stock, unserviceable condition (reorder)							
10 ea disposal bags	Insufficient stock, unserviceable condition (reorder)							
1 ea/95 gal Overpack	Insufficient stock, unserviceable condition (reorder)							
Review TAP Spill Contingency Plan	Outdated information							
CONTAINER STORAGE AREA	POTENTIAL PROBLEM(S) TO LOOK FOR:						LOCATION AND PROBLEM OBSERVED	DATE & NATURE OF CORRECTIVE ACTION
Container inventory and inspection	All items stored not listed, recorded on inventory log, leaking containers							

ITEM		MON Date/Time	TUES Date/Time	WED Date/Time	THUR Date/Time	FRI Date/Time	LOCATION AND PROBLEM OBSERVED	DATE & NATURE OF CORRECTIVE ACTION
STRUCTURAL BUILDING	POTENTIAL PROBLEM(S) TO LOOK FOR:	**S**-SAT **U**-UNSAT **NA**-NOT APPL	**S**-SAT **U**-UNSAT **NA**-NOT APPL	**S**-SAT **U**-UNSAT **NA**-NOT APPL	**S**-SAT **U**-UNSAT **NA**-NOT APPL	**S**-SAT **U**-UNSAT **NA**-NOT APPL		
General debris & refuse	Obstructions, general housekeeping, etc.							
Odor, fumes	Detectable smell, eye or nose irritation, etc.							
Bases or foundations, containment, ramps, roof, walls	Deteriorating, leaking, cracks and spalling in concrete, evidence of leaking, wet spots from containers							
SECURITY	POTENTIAL PROBLEM(S) TO LOOK FOR:						LOCATION AND PROBLEM OBSERVED	DATE & NATURE OF CORRECTIVE ACTIONS
Telephone system	Not operating							
Warning Signs	Illegible , missing							
Building doors, locks, fence gates	Locks missing, unlocked, signs of tampering, etc.							
CONTAINER STORAGE AREA	POTENTIAL PROBLEM(S) TO LOOK FOR:						LOCATION AND PROBLEM OBSERVED	DATE & NATURE OF CORRECTIVE ACTION
Containers	Corrosion, structural defects, serious dents, leaking containers, etc.							
Sealing of containers	Open lid/bungs when not in use, leaking contents, etc.							
Labeling of containers	Improper identification; ASD missing, labeling not legible, "HW" missing							
Adequate aisle space	Obstructions, insufficient space for emergency response equipment							
Containment area, concrete	Cracks, presence of accumulated liquids, containers outside containment area							
Container placement and storage	Insufficient aisle space, excessive stack heights							
Segregation of incompatible wastes	Storage of incompatible wastes in same area, improper distance between barriers							
Pallets	Damaged, broken							
Containment system	Cracks, presence of liquids							
Identification of storage areas	Signs posted (i.e., Flammable, Corrosive, Combustible, Oxidizer, Class 9)							

APPENDIX R

Page ____ of_____

CONTAINER(s) INSPECTION LOG

The USAG-HI proponent for this form is the Directorate of Public Works

NAME/TELEPHONE NUMBER: _____

TAP/90-DAY ASF MANAGER: _____

LEAKING DRUMS

INSPECTION DATE	TOTAL NO. OF DRUMS INSPECTED	QUANTITY (ID. NOS.)	COMMENTS/CORRECTIVE ACTIONS

USAG-HI Form 32, Oct 08 (This form replaces USAG-HI Form VG-GW-02-03-R-E, Jan 02, which is obsolete)

APPENDIX S

TAP/90-DAY ASF TRAINING LOG

The USAG-HI proponent for this form is the Directorate of Public Works

NAME OF EMPLOYEE: _____

DATE OF EMPLOYMENT: _____

JOB DESCRIPTION: _____

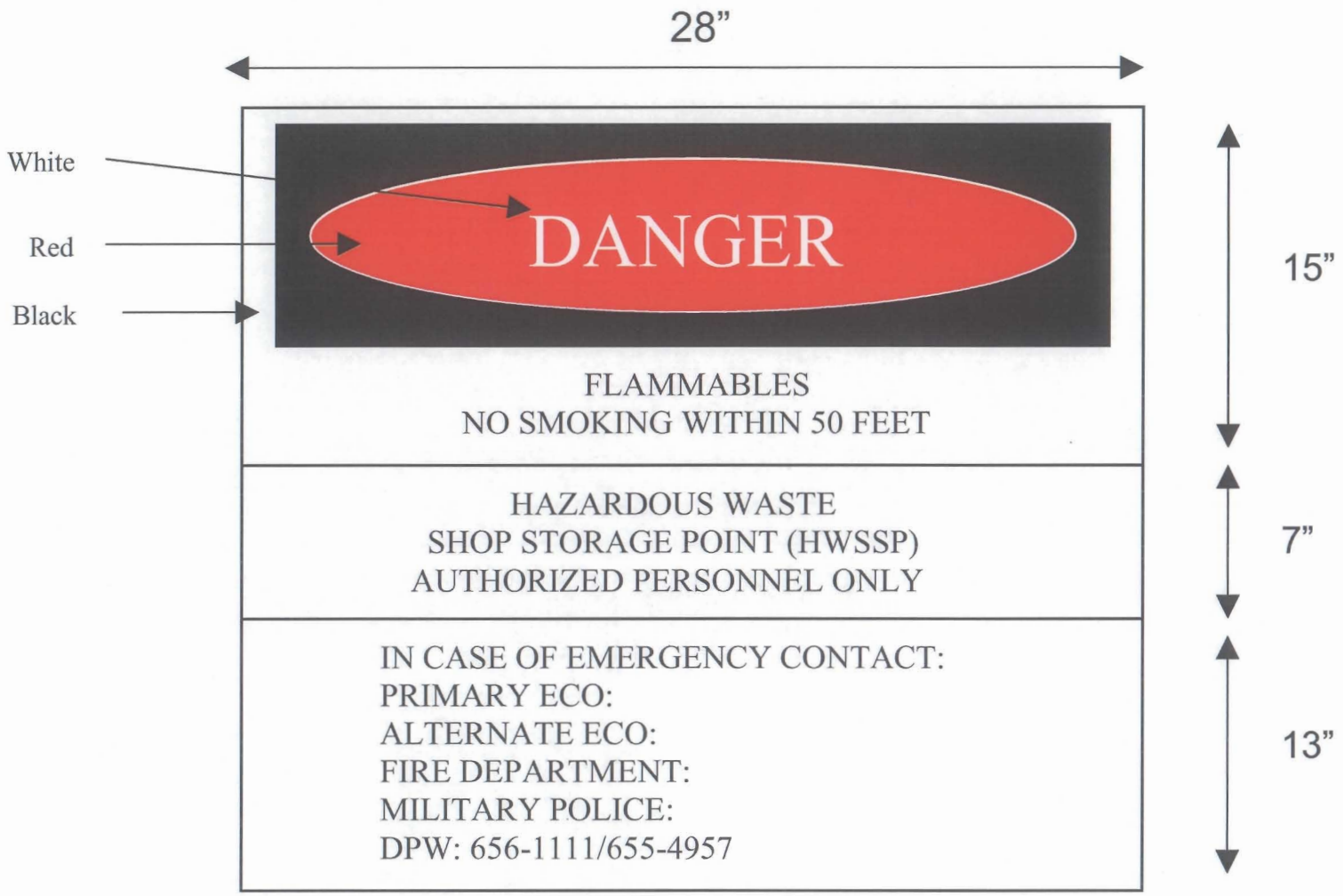
DATE OF RELEASE: _____

COURSE NAME/DESCRIPTION	DATE COMPLETED

USAG-HI Form 34, Apr 10
This form is prescribed for use in USAG-HI Reg 200-4, Installation Hazardous Waste Management Plan (IHWMP)

APPENDIX T

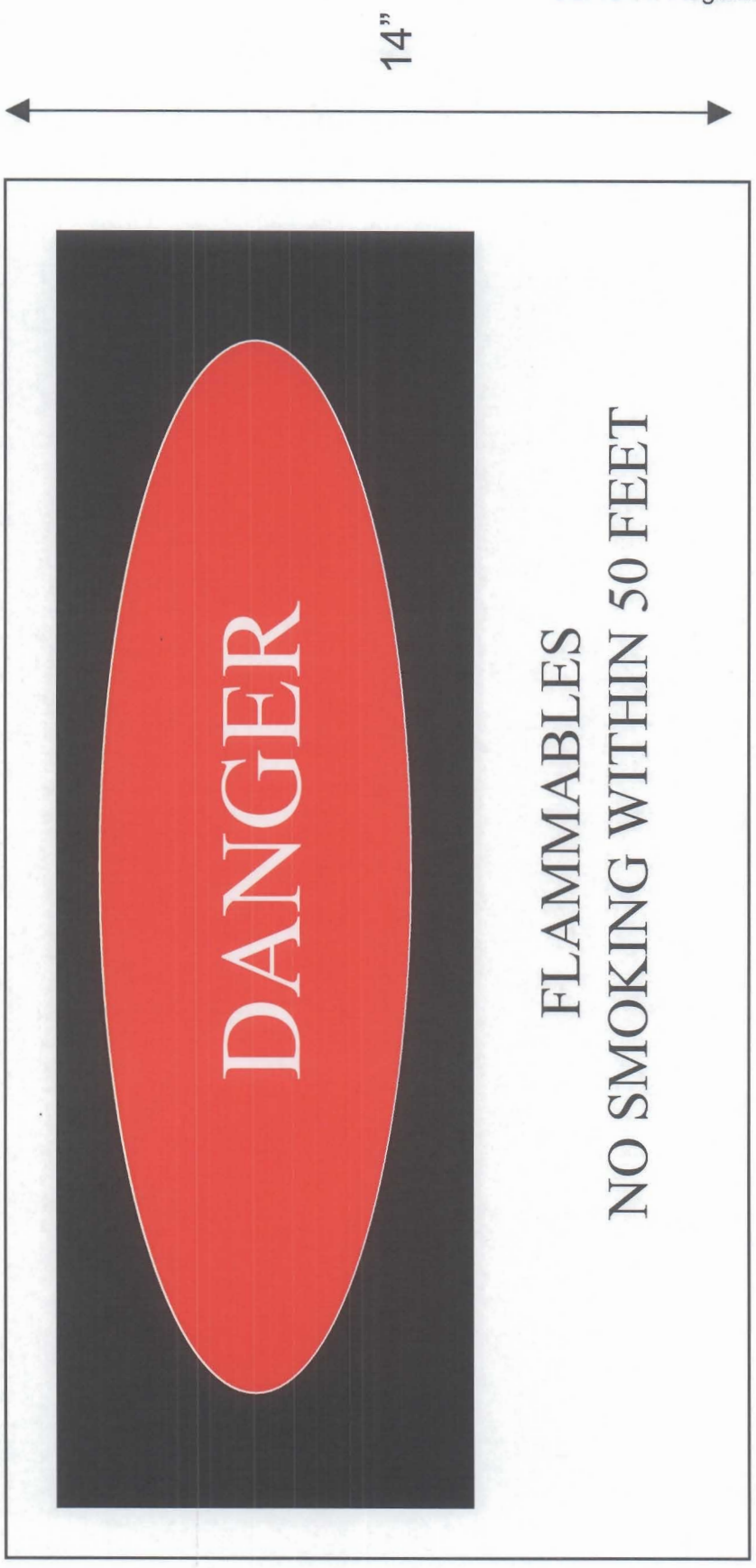
HAZARDOUS WASTE SHOP STORAGE POINT SIGN



All letters must be 1 inch

APPENDIX U

DANGER-FLAMMABLES SIGN

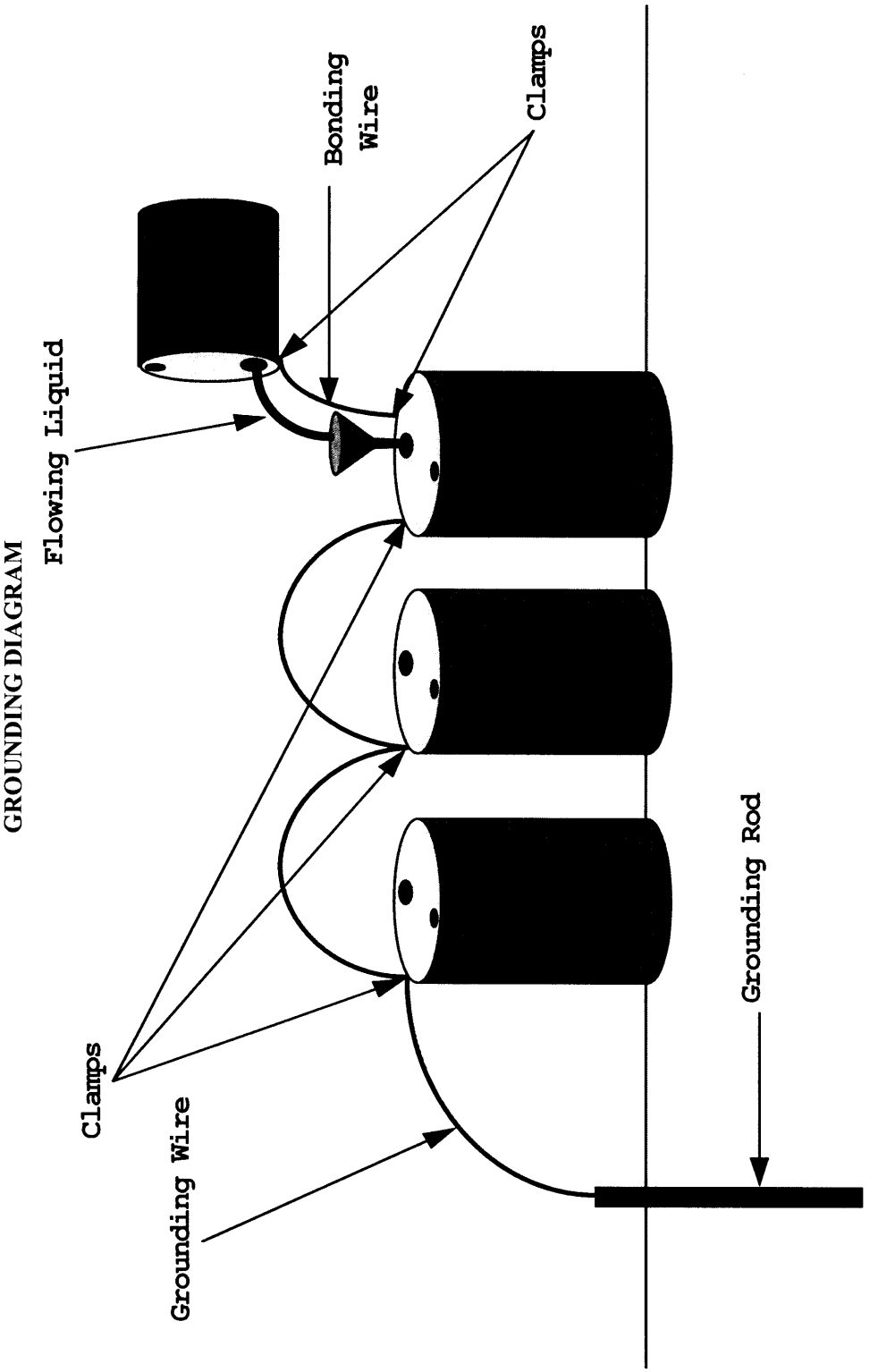


APPENDIX V

DANGER-CORROSIVES SIGN

APPENDIX W

Grounding Diagram



APPENDIX X

RECYCLABLE MATERIAL SHOP STORAGE POINT (RMSSP)
RECYCLABLE MATERIAL / NON-REGULATED WASTE COLLECTION LOG

The USAG-HI proponent for this form is the Directorate of Public Works

ACTIVITY/COMMAND: _____

BUILDING NO./INSTALLATION: _____

PRIMARY MATERIAL BEING COLLECTED: _____

CONTAINER SIZE/ID. NO.: _____

PROCESS GENERATING RECYCLABLE MATERIAL/NON-REGULATED WASTE: _____

DATE	ITEM POURED/ DEPOSITED	QTY POURED/ DEPOSITED		PRINT NAME	SIGNATURE
		GAL/WT	TOTAL		

I CERTIFY THAT I HAVE EXAMINED AND AM FAMILIAR WITH THE ABOVE LISTED MATERIAL / WASTE THROUGH ANALYSIS AND TESTING AND/OR COLLECTION PROCEDURES TO SUPPORT THIS CERTIFICATION. I CERTIFY THAT ALL INFORMATION SUBMITTED IS ACCURATE AND THAT I HAVE PROPERLY IDENTIFIED THE MATERIAL/WASTE.

PRINT NAME	SIGNATURE	DATE

USAG-HI Form 31, Oct 08 (This form replaces USAG-HI Form VG-GW-02-02-R-E, Jan 02, which is obsolete)