

COMMANDER, NAVY REGION SOUTHWEST

**MANAGEMENT OF
PHARMACEUTICALS AND
PERSONAL CARE PRODUCTS
GUIDANCE**



JUNE 2013

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RECORD OF AMENDMENTS

This Pharmaceuticals, Personal Care Products Management Guidance will be revised as necessary to reflect changes in waste generation/operations or Return to Vendor Program policies at **Insert Installation's Name**, and shall remain current with all applicable federal, state, and local regulations. This sheet shall therefore be used to reflect necessary updates to this document.

Revision Number	Date	Name of Person	Initials	Reason for Amendment	Pages Affected

ACRONYMS & ABBREVIATIONS

ACRONYM	DEFINITION
AOR	Area of Responsibility
AUL	Authorized Used List
BMP	Best Management Practice(s)
BOL	Bill of Lading
BUMED	Bureau of Medicine and Surgery
CERCLA	Comprehensive Environmental Response, Compensation, & Liability Act
CFR	Code of Federal Regulations
CNRSW	Commander Navy Region Southwest
CO	Commanding Officer
CUPA	Certified Unified Program Agency
DEH	Department of Environmental Health
DLA	Defense Logistics Agency
DOD	Department of Defense
DON	Department of the Navy
DOT	Department of Transportation
DTSC	Department of Toxic Substances Control
EHM	Excess Hazardous Material
EMS	Environmental Management System
EPA ID	Environmental Protection Agency Identification Number
ERM	Excluded Recyclable Material
FFCA	Federal Facilities Compliance Act
FY	Fiscal Year
GHS	Globally Harmonized System
HM	Hazardous Material
HMBP	Hazardous Materials Business Plan
HW	Hazardous Waste
HWPM	Hazardous Waste Program Manager
IEPD	Installation Environmental Program Director
MSDS	Material Safety Data Sheet
MWR	Morale, Welfare, and Recreation
NAVOSH	Navy Occupational Safety and Health
OPNAVINST	Office of Chief of Naval Operations Instructions
OSHA	Occupational Health and Safety Administration

ACRONYM	DEFINITION
OTC	Over-the-Counter
PPE	Personal Protective Equipment
P2	Pollution Prevention
PPCP	Pharmaceuticals and Personal Care Product(s)
QRP	Qualified Recycling Program
RCRA	Resource Conservation and Recovery Act
RL	Reverse Logistics
RM	Retrograde Material
RQ	Reportable Quantity
RTV	Return to Vendor
SAA	Satellite Accumulation Area
SM	Surplus Material
SOP	Standard Operating Procedures
SW	Solid Waste
TSCA	Toxic Substances Control Act
UIC	Unit Identification Code
UW	Universal Waste
WMP	Waste Management Plan
WSD	Waste Stream Determination

INTRODUCTION

Commander, Navy Region Southwest (CNRSW) Environmental Program's mission is to provide support and technical guidance for activities in the CNRSW area of responsibility (AOR), so as to assist these operations/activities in attaining the highest level of competence and compliance with existing federal, state, and local environmental protection laws.

Nationally, there is increasing concern about the effects of pharmaceuticals and personal care products (PPCPs) and un-regulated hazardous materials (HM) entering the environment. In some parts of the country, trace amounts of PPCPs have been detected in groundwater and surface waterways. The evidence is mounting that current practices for the disposal of PPCPs, such as landfilling and flushing to sanitary sewers, are inadequate to protect the drinking water resources of our country.

This issue is of importance to CNRSW's Environmental Program, since the installations are hosts to various operations that either sell, store, or come into contact with PPCPs and hazardous waste (herein referred to as PPCP/HW) items. Accordingly, PPCPs encompass a wide variety of consumer products that contain active ingredients which could render them subject to state or federal regulation as Hazardous Waste (HW), for example: dandruff shampoos, cosmetics and skin care products, pet products, non-prescription over-the-counter (OTC) "drugs", and health products.

However, as of fiscal year (FY) 13, the United States Environmental Protection Agency (U.S. EPA) has not promulgated regulations pertaining to the management and proper disposal of all PPCPs, except for the limited number of pharmaceuticals cited as Resource Conservation and Recovery Act (RCRA), P and U listed wastes. Various states, including California, currently regulate PPCPs either through medical waste management legislation or using their own criteria for state regulated hazardous waste.

SECTION 1 - ADMINISTRATION

1.1 Purpose

This Guidance Document establishes guidance to retail and non-retail operations/activities associated with Naval installations in the CNRSW AOR which handle, store, use, sell, or come into contact with PPCP/HW. These PPCPs include those which are purchased without a prescription and/or are not listed as a Drug Enforcement Agency (DEA) Scheduled Drug.

This Guidance Document provides the following specific information:

a. Essentially, the activity shall manage and dispose of all PPCP waste generated from expired, unused, surplus, damaged, spilled, retrograde, or otherwise non-saleable items as described in this guidance document.

b. Guidance on the identification, segregation, labeling, storage, and disposal of these items once they have been deemed non-saleable is provided in compliance with applicable federal, state, and local laws for pollution prevention (P2) and environmental compliance.

c. This guidance document also explains key environmental program elements which protect the health and safety of the activity's associates, their customers, and the environment.

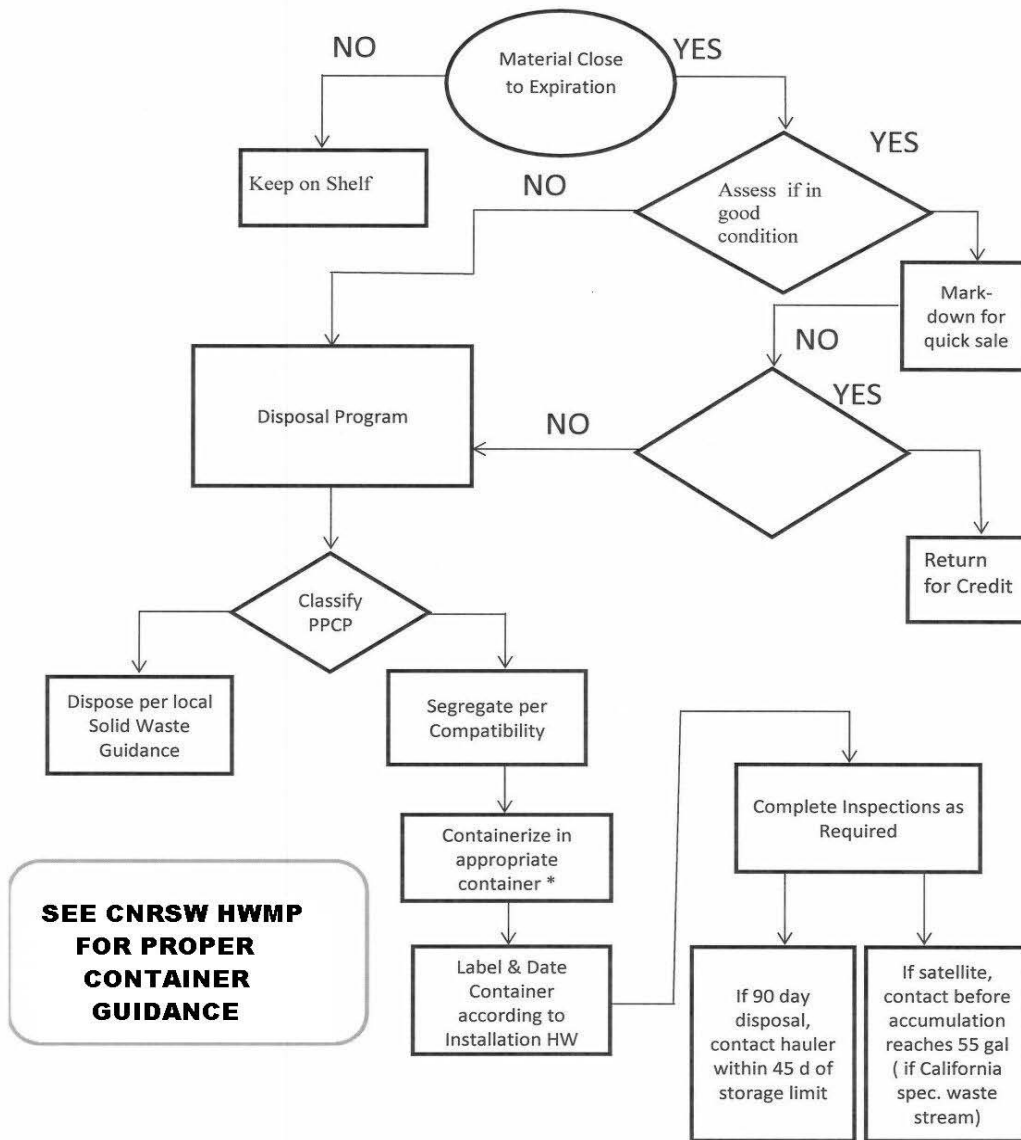
d. Additionally, it provides information that will assist in minimizing the risk of noncompliance in a manner that conserves resources and the taxpayer's investment in national security.

1.2 Applicability/Scope

Specifically, this document provides guidance for activities including but, not limited to departments, tenant commands, and contractors operating aboard a regional installation. This encompasses activities characterized as: retail stores; convenience stores; commissaries; medical facilities; lodging; morale, welfare, and recreation (MWR); day care facilities; food services; and other contractor-related operations not under the AOR of the Bureau of Medicine and Surgery (BUMED).

The rationale for achieving compliance depends on identifying PPCPs/HW and using existing inventory control mechanisms to prevent PPCP and HM waste-out; or where available, implement recycling, HM reuse, or Reverse Logistics (herein referred to as Return to Vendor-RTV) programs to eliminate the need for disposing of surplus, retrograde, or expired PPCP and HM as HW. Only where all methods for recycling, reuse, or RTV have been exhausted will these items be slated for HW disposal.

Training and environmental awareness are important to ensure the safety of associates at affected operations in the CNRSW AOR. Managers and associates working in areas with PPCPs and affected HM should be knowledgeable and trained about the core contents of this SOP in order to be informed of the importance of environmental compliance, P2, and related personnel safety.



PPCP Management Flowchart

Figure 1.1

SECTION 2 - APPLICABLE REGULATIONS

2.1 Overview

All military and civilian personnel under the CNRSW AOR must be aware of environmental laws and regulations related to the generation, storage, treatment, or disposal of hazardous waste resulting from any specific process or operation conducted at their activity. The procedures and requirements identified in this PPCP/HW SOP are mandated by federal, state, and local regulations; and are therefore not discretionary.

The following regulations are some of the applicable standards used as the basis for development and required implementation of this SOP.

2.2 Federal Facilities Compliance Act (FFCA)

The U.S. Congress waived sovereign immunity for Department of Defense (DOD) facilities subjecting them to full regulation including assessment of fines and/or criminal liability for personnel involved in violating HW regulations.

2.3 Resource Conservation and Recovery Act (RCRA)

The Resource Conservation and Recovery Act (RCRA) authorized the United States Environmental Protection Agency (U.S.EPA) to implement regulations for the management of Hazardous Waste (HW) from the point of generation through final disposal.

2.4 Code of Federal Regulation (CFR)

The Code of Federal Regulations (CFR) is an arrangement of federal regulations covering an extensive list of broad subject areas. It is divided into 50 titles, two of which, (40 CFR and 49 CFR) are applicable to the execution of this procedure, and are therefore outlined below.

2.4.1 Title 40 (40 CFR)

Title 40 was formed from the requirements of Toxic Substances Control Act (TSCA); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); and RCRA among other environmental legislations. This regulation is one of the major references for the management of standards applicable to hazardous waste management and spill response procedures.

a. 40 CFR 279. The U.S. EPA regulation for the management of used oil and used oil filters, and it includes reporting,

storage, disposal, recycling for energy value, and other related requirements.

b. 40 CFR 260-268, 270, 273. The U.S. EPA regulations that establish a "cradle-to-grave" approach for managing, storing, and disposing of HW including: waste characterization, manifest system, generator standards, treatment standards, and disposal requirements. These regulations also include the requirements for recycling materials, including burning material for its energy value.

c. 40 CFR 116-117. The U.S. EPA regulations governing when and how a release or spill of a chemical in quantities exceeding the reportable quantity (RQ) must be reported to the National Response Center.

2.4.2 Title 49 (49 CFR)

Title 49 is the federal rule that governs the transportation of hazardous material and hazardous waste.

a. 49 CFR 171-180. The Department of Transportation (DOT) regulations for the shipment of Hazardous Material and Hazardous Waste (HM/HW) across public highways. Regulations include the requirements for packaging, labeling, marking, and the placarding of vehicles. The DOT regulations include design specifications for containers used to hold HM/HW during transportation.

b. 49 CFR 390-397. The DOT rules that govern the manner of transport, qualifications of the drivers, the equipment in the vehicle, and in some cases, routing of HM or HW shipments.

2.5 Medical Waste Management Act (MWMA)

The Medical Waste Management Act (MWMA) of California, California Health and Safety Code Sections 117600 -118360, governs the management of medical waste in all jurisdictions of the state. (*refer to state specific regulations on medical waste management where applicable*).

SECTION 3 - TERMS & DEFINITIONS

** Terms and definitions may vary by state**

Abandoned or Unknown Waste. Abandoned waste is described as any unwanted hazardous material that is abandoned on property without the owner's permission. The waste containers have no information from which to identify the true hazardous waste generator. Unknown wastes include any material whose chemical makeup or characteristic is unidentifiable. Abandoned waste may also be an unknown waste and is considered a hazardous material until it is properly identified.

Accumulation Start Date means:

a. Accumulation Start Date at 90-day storage area:

(1) The accumulation start date is the date the first drop or item is placed into a HW container,

(2) The date that a container is moved from a satellite accumulation area (SAA) into a 90-day storage area.

b. Accumulation Start Date at a Satellite Accumulation Area:

(1) The date that the total amount of HW exceeds the 55-gallon limit,

(2) The date the HW is picked up from the SAA.

c. Accumulation Start date for Universal Waste: The date the first item is placed in the container.

Activity. An independent command performing a specific mission having its own UIC.

Authorized Representative. The person responsible for the overall operation of a facility or part of a facility. An authorized representative is normally the Commanding Officer or persons of equivalent responsibility. The Commanding Officer may designate in writing an "authorized representative" to act on their behalf.

Authorized Users List (AUL). An inventory list developed, and revised as necessary, and implemented at an activity-level for Hazardous Materials that identifies and quantifies HM, including categorizing the material as an extremely hazardous substance, hazardous substance, or toxic chemicals maintained on site.

Best Management Practices (BMP). These describe practical work techniques that limit the introduction of pollutants into the environment. BMPs achieve a compromise between the environmental ideal (no pollution whatsoever) and what is realistic and practical from an economic and operational standpoint. Emphasis, however, is on the best environmental solution.

Bill of Lading. A bill of lading is generated by a shipper, details a shipment of merchandise, gives title to the goods, and requires the carrier to deliver the merchandise to the appropriate party.

Certified Unified Program Agency (CUPA). An agency certified by DTSC to conduct the Unified Program, which consists of hazardous waste generator and onsite treatment programs, aboveground and underground storage tank programs, Hazardous Materials Management and Business/Contingency Plans and Inventory Statements, and the Risk Management and Prevention Program. (The CUPA is generally a part of the county or city Fire Department or Environmental Health Department).

Characteristic Waste. Waste that is considered hazardous under RCRA because it exhibits any of four different properties: ignitability, corrosivity, reactivity, and toxicity.

Characterization. Refers to the process of identifying waste components, their concentrations, and the work process from which HW is generated. Characterization is required to ensure the correct U.S. EPA waste codes or state waste codes are identified and for the proper handling, treatment, and disposal of HW. **Classification.** It is the generator's responsibility to determine whether the waste is a hazardous waste or not, to self-classify their waste as hazardous or non-hazardous waste, and to manage the waste according to applicable management standards. The generator has two options for classifying waste: using Analytical testing data or knowledge of the materials and processes used to generate the waste.

Container. Refers to any portable device in which a material is stored, transported, treated, or disposed.

Contaminant. Refers to any chemical that when present causes the waste to be regulated.

Contaminated Medium/Media. Refers to soil, sediment, surface water, groundwater, or air that contains a contaminant subject to regulations.

Contingency Plan. A document that contains an organized, planned, and coordinated course of action to be taken in case of a fire, explosion, or release of a hazardous material or waste.

Corrosivity. A characteristic of acidic and alkaline hazardous wastes. e.g., alkaline battery fluid, that causes burns to the skin and damage to metal.

Cradle to Grave. The time period from the initial generation of hazardous waste to its ultimate disposal.

Debris. Any solid material, with a diameter of 2.4 inches or larger, intended for disposal including manufactured objects, plants or animal matter, or natural geologic material; this includes brushes, rags, rollers, personal protection equipment (PPE), large and small equipment, etc.

Disposal. The discharge, deposit, injection, dumping, spilling, leaking, or placing of any waste so that the waste or any constituent of the waste is or may be emitted into the air or discharged into the land or water. This includes the abandonment of any waste.

Emergency Contingency Plan (ECP). See Hazardous Material Business Plan

Empty Container. Any HM or HW container, except a compressed gas cylinder, aerosol cans or an acute HW container, that has had all wastes removed, that may be removed, using all commonly employed techniques for the type of container, e.g., pouring, pumping, and aspirating, or with the approval of the regulatory agency and the Installation:

a. No more than 2.5 centimeters (one inch) of residue remains in the bottom of the container; or

b. No more than 3 percent by weight of the total capacity of the container remains in the container if the container is less than or equal to 119 gallons in size; or

c. A compressed gas is empty when the pressure inside the container approaches atmospheric pressure.

d. A container with an inner liner shall have the liner removed.

EPA Hazardous Waste Codes. The specific alphanumeric sequence assigned by the U.S. EPA to specify type and characteristic of a HW.

EPA Identification Number. A unique number assigned by EPA to each hazardous waste generator, transporter, or treatment, storage, and disposal facility.

E-Waste. Electronic and electrical equipment which is unusable or unwanted devices with a plug or battery, e.g., television; cell phone; digital camera; computer monitor; printer or scanner.

Excess Hazardous Material (EHM). Full or partially full containers of HM, exceeding the activity's requirements or that are no longer needed, that may be used by another activity or by a commercial industry.

Excluded Recyclable Material (ERM). Generators may classify and manage some of their hazardous wastes as Excluded Recyclable Material (ERM). Recyclable material is defined as a hazardous waste that is capable of being recycled, including residues, spent materials, contaminated materials, retrograde materials, and specific byproducts. The recycling exclusions or exemptions are conditional, and in general apply to on-site recycling, at unpermitted facilities, and for non-RCRA hazardous waste.

Facility. Regulated site or business entity encompassing all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage, resource recovery, disposal, or recycling of hazardous waste.

Flammables. A class of compounds that ignite easily and burn rapidly.

Flash Point. The lowest temperature at which a liquid generates enough vapor to ignite in air. If a waste has a flash point of less than 140° F., then it is an ignitable hazardous waste.

Free Liquids. Any liquid, which readily separates from the solid portion of a waste under ambient temperature and pressure.

Generator. Any person, by site, whose act first creates or produces a hazardous waste, used oil, or medical waste, or first causes such materials to become subject to regulation.

Global Harmonized System. The United Nations (UN) adopted the Globally Harmonized System of Classification and Labeling of Chemicals (GHS) in 2003. This system includes criteria for the classification of health, physical, and environmental hazards, in addition to specifying what type of information should be included on the labels of hazardous chemicals and safety data sheets.

Hazard Communication. The OSHA standard that requires workers be provided with information about the hazards and identity of the chemicals they are exposed to while working, as well as the measures they can take to protect themselves.

Hazardous Debris. Debris that contains a listed HW or that exhibits a characteristic of HW.

Hazardous Material (HM). Any material that, because of its quantity, concentration, or physical or chemical characteristics, may pose a real hazard to human health or the environment. Hazardous materials include the following categories: Flammable and Combustible Material; Toxic Material; Corrosive Material; Oxidizers; Aerosols; Compressed Gases; Mercury; Asbestos; Propellants; Bulk fuels; Ammunition; Medical Waste; Chemical; Biological; and Radiological materials. A new unused, unopened container of a hazardous substance is an example of hazardous material.

Hazardous Material Business Plan (HMBP). The document which identifies the organized plan and coordinated course of action to be followed for a fire, explosion or release of hazardous waste or hazardous waste constituents into the environment.

Hazardous Material Inventory. A complete inventory of all hazardous materials to include chemical/container location; common name; whether an EHS; quantity on hand; physical state

(e.g., solid, liquid or gas); container type; container size; etc.

Hazardous Waste (HW). Substances which can pose a substantial or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed. Hazardous waste is unwanted or discarded material (liquid, solid or gaseous) that meets the definition of a hazardous material and possesses at least one of these four characteristics: ignitability, corrosivity, reactivity or toxicity; or appears on special U.S. EPA lists, e.g., oil-based paints; car batteries; weed killers; chlorine bleach; and electronic devices.

Hazardous Waste Constituent. Chemical(s) that cause the waste to be regulated.

Ignitability. A characteristic of hazardous waste which identifies wastes that can readily catch fire and sustain combustion.

Incompatible Waste. Wastes that, when in contact with one another, have the potential to produce heat or pressure; fire; explosion; violent reaction; toxic or flammable dusts; mists; fumes; or gases.

Inner Liner. A continuous layer of material placed inside a container that separates the actual container from the material stored in it.

Lamp (Light Bulbs). The bulb or tube portion of electric lighting devices. Common universal waste (UW) lamps include fluorescent; high intensity discharge; neon; mercury vapor; high-pressure sodium; and metal halide.

Listed Waste. By definition, EPA determined that some specific wastes are hazardous. These wastes are incorporated into lists published by the Agency. These lists are organized into three categories:

a. The F-list (non-specific source wastes). This list identifies wastes from common manufacturing and industrial processes, such as solvents that have been used in cleaning or degreasing operations. Because the processes producing these wastes can occur in different sectors of industry, the F-listed wastes are known as wastes from non-specific sources. Wastes

included on the F-list can be found in the regulations at 40 CFR §261.31.

b. The K-list (source-specific wastes). This list includes certain wastes from specific industries, such as petroleum refining or pesticide manufacturing. Certain sludges and wastewaters from treatment and production processes in these industries are examples of source-specific wastes. Wastes

included on the K-list can be found in the regulations at 40 CFR §261.32.

c. The P-list and the U-list (discarded commercial chemical products). These lists include specific commercial chemical products in an unused form. Some pesticides and some pharmaceutical products become hazardous waste when discarded. Wastes included on the P- and U-lists can be found in the regulations at 40 CFR §261.33.

Manifest. The shipping document EPA Form 8700-22 (including, if necessary, EPA Form 8700-22A), originated and signed by the generator, that accompanies and is used for tracking the transportation of HW.

Material Safety Data Sheet (MSDS). A written document provided by the manufacturer containing information and instructions on hazardous materials present in the workplace; MSDSs contain details about chemical and physical properties, hazards and risks relevant to the substance; requirements for its safe handling; actions to be taken in the event of fire, spill, or overexposure; and recommended disposal procedures.

Medical Waste. Cultures and stocks of infectious agents; human pathological wastes; human blood and blood products; used sharps; certain animal wastes; certain isolation wastes; and unused sharps.

Mercury-Containing Equipment. Any device or part of a device (excluding batteries and lamps) that contains elemental mercury.

Non-RCRA Hazardous Wastes. All hazardous wastes regulated in the state, other than RCRA hazardous waste.

Notice of Violation (NOV). Notice to a generator/facility written as part of an administrative action.

Over-the-Counter (OTC). The Food and Drug Administration (FDA) defines OTC drugs as safe and effective for use by the general public without a physician's prescription.

Paint and Paint-Related Waste. Liquid paints, thinners and debris such as rags; brushes; rollers; tape; etc. or a mixture of pigment and suitable liquids that form an adherent coating when spread on a surface or any material.

Pesticide. Any substance or mixture of substances intended for preventing; destroying; repelling; or mitigating any pest or intended for use as a plant regulator, defoliant, or desiccant.

Permits. Certificates or other documents granted by local authorities to collect, accumulate and manage waste or to operate waste management facilities such as hazardous waste accumulation areas and recycling centers.

pH. A convenient way of describing the strength of an acidic or basic aqueous solution. The values range from 0 to 14, with a pH of 7 corresponding to neutral. Strongly acidic waste solutions (pH less than 2) and strongly basic ones (pH greater than 12.5) are defined as hazardous wastes because of their corrosive effect on metals and on skin.

Pharmaceutical. A prescription or OTC human or veterinary drug not regulated pursuant to the Resource Conservation and Recovery Act (RCRA) or the Radiation Control Law.

Point of Generation. The date and location that a material first becomes subject to the HW regulations.

Profile Sheet. The DRMS DD-1930 or other forms that are used to document specific disposal information for each waste stream sent to the disposal facility.

Reactivity. The characteristic which identifies substances that can create a poisonous gas or readily explode when combined with other chemicals, e.g., would react violently when mixed with water and would generate a toxic gas.

Reportable Quantity. A specific quantity of hazardous waste as identified in CFR 117, which once released into the environment, has specific reporting requirements.

Reporting and Recordkeeping. There are many recordkeeping requirements applicable to generators. Some records are

specific to the generator or type of facility, and others are required by law, e.g., manifests, bills of lading, analytical/supporting documentation to make waste determination; permits and correspondence with regulators; operational plans; required periodic data calls; inspection reports; spill release/response reports; and training documentation.

Representative Sample. A sample taken in a manner that when analyzed can be expected to exhibit the average properties of all material in the container.

Resource Conservation and Recovery Act (RCRA). A 1976 amendment to the first federal solid waste legislation, the Solid Waste Disposal Act of 1965. In RCRA, Congress established initial directives and guidelines for U.S. EPA to regulate and manage solid waste, including hazardous waste. RCRA established a regulatory system to track hazardous substances from the time of generation to final disposal.

Return to Vendor Program. See "Reverse Logistics"

Retrograde Material. Retrograde material means any hazardous material which is not to be used, sold, or distributed for use in an originally intended or prescribed manner; or for an originally intended or prescribed purpose and which meets any one or more of the following criteria:

- a. Has undergone chemical, biochemical, physical, or other changes due to the passage of time or the environmental conditions under which it was stored.
- b. Has exceeded a specified or recommended shelf life.
- c. Is banned by law, regulation, ordinance, or decree.
- d. Cannot be used for reasons of economics, health or safety, or as an environmental hazard.

Reuse. To use an item more than once for the same purpose, which helps save money, time, energy and resources.

Reverse Logistics. The process that is initiated when a consumer product goes backwards in the distribution chain; herein referred to as Return to Vendor (RTV).

Secondary Containment. A structure designed to capture spills or leaks, as from a container or tank. Construction of such containment must meet certain requirements, and periodic inspections are required.

Safety Data Sheet (SDS). The Hazard Communication Standard (HCS) (29 CFR 1910.1200(g)), revised in 2012, requires that the chemical manufacturer, distributor, or importer provide Safety Data Sheets (SDSs) (formerly MSDSs or Material Safety Data Sheets) for each hazardous chemical to downstream users to communicate information on these hazards.

Solid Waste (SW). Any garbage, refuse, sludge from a waste treatment plant, water supply treatment plant or air pollution control facility, and other discarded material; including solid, liquid, semisolid, or contained gaseous material resulting from industrial, municipal, commercial, mining, and agricultural operations, and from community and institutional activities.

Sorbent. A material used to soak up free liquids by either adsorption or absorption, or both.

Source Separation. The separation of recyclable materials at their point of generation by the generator.

Spill. The accidental or intentional leaking, pumping, emitting, emptying, or dumping of a HM, SW, or HW into or on any land or surface waters.

Storage. Holding hazardous waste for a temporary period, after which the hazardous waste is treated, disposed of, or stored elsewhere.

Toxicity. Ability to harm human health or environment, such as injury, death or cancer. One of the criteria used to determine whether a waste is a hazardous waste.

Training. Educating personnel to understand what hazardous substances are and the risk associated with their handling, storage and management; recognize a hazardous substance release, recognize the risk, and initiate an emergency response and notifications.

Transportation. The movement of HM/HW by air, rail, highway, or water.

Transporter. Any person engaged in the off-site transportation

of hazardous waste, used oil, universal waste, or medical waste which requires the use of a manifest. Regulated off-site transportation includes shipments of hazardous waste by highway, air, rail, or water.

Treatment. Any method, technique, or process designed to change the physical, chemical, or biological character or composition of any HW so as to neutralize such waste; or so as to recover energy or material resources from the waste; or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume. Treatments include but are not limited to, either physical or chemical extractions, chemical or thermal destruction. The residues from these treatments shall be managed in accordance with regulations.

Universal Waste (UW). Commonly recycled wastes with special simplified management provisions intended to facilitate recycling. There are four categories of universal wastes: hazardous waste batteries; hazardous waste pesticides that have been recalled or collected in waste pesticide collection programs; hazardous waste lamps, e.g., fluorescent light tubes; and hazardous waste mercury-containing equipment such as thermostats.

Used Oil. Any oil, refined from crude oil or synthetic oil that, as the result of use, is contaminated with physical or chemical impurities. Used oil does not include oil water mixtures that are mostly water.

Volatile. Describes substances that readily evaporate at normal temperatures and pressures, e.g., common solvents.

Wastewater. Waste that contain less than 1% by weight total organic carbon (TOC) and less than 1% by weight total suspended solids (TSS).

Waste Management. The management of waste collection; handling; processing; storage and transport from where it is produced to where it is finally disposed, i.e., "cradle to grave".

Waste Profiling. A method that identifies and classifies waste streams based on analytical testing and/or user knowledge of the specific process.

SECTION 4 - RESPONSIBILITIES & TRAINING

4.1 Installation Environmental Program Director

The Installation Environmental Program Director (IEPD) shall ensure that the Environmental Office maintains oversight of waste management at the activities outlined in this SOP. This includes, but is not limited to ensuring that the Hazardous Waste Program Manager (HWPM):

- a. Is aware of the contents of the RTV Program at their facility, and shall brief the IEPD on the program on a regular basis, and/or whenever known changes to the program is implemented.
- b. Ensures that personnel at the facility are aware of corresponding training requirements (for generator and transporter), and required records and reporting associated with HW management.
- c. Reviews the RTV Program to understand and ensure compliance with environmental regulations related to proper classification and management of HM to be shipped.
- d. Provides training to the activity for proper management of HW.

4.2 The General Manager/Activity Manager shall:

- a. Retain ultimate responsibility for environmental compliance and readiness of the activity including implementation of this SOP.
- b. Budget, fund, and manage PPCP/HW in compliance with applicable federal, state, local HW laws/regulations, and local county ordinances.
- c. Comply with the installation Commanding Officer's (CO) Environmental Policy/Environmental Management System (EMS) to continually improve environmental quality.
- d. Maintain and have available for review an updated inventory list of PPCP/HM with corresponding waste determination information (e.g., segregation protocol and waste disposal options).

e. Oversee development and implementation of a site-specific RTV Program. This program shall be updated and reviewed as inventories/authorized used lists(AULs) and vendors change, and shall be documented and communicated to the installation's Environmental Office.

f. Have a copy of the RTV Program readily available for review.

g. Ensure that personnel, their supervisors, Waste Coordinators and Alternates who generate or oversee the generation, segregation, collection, or containerization of PPCP/HW receive corresponding training within one month of assignment, and annual refresher thereafter.

h. Ensure that vendors who pick up HM have received proper DOT 49 CFR training for shipping PPCP/HM as it relates to the RTV Program. Documentation in support of such training shall be available for review.

i. Designate in writing, with a copy to the installation Environmental Office, the person(s) responsible for waste oversight.

j. Identify waste accumulation and claims return areas, and indicate on ECP site map if applicable.

4.3 Waste Coordinators & Alternates

Once Waste Coordinator(s) and Alternate(s) are designated, these persons shall:

a. Attend initial hazardous waste generator training within one month of assignment and annual refresher training thereafter.

b. Provide annual training to all assigned shop personnel regarding Hazardous Material Business (HMBP), emergency procedures, and any shop level HW and HM management requirements.

c. Maintain a current ECP at your location if applicable, and comply with all requirements of this document (see CNRSW Waste Management Plan for details).

- d. For retail operations: Coordinate with relevant departments/teams such as Loss Prevention, Safety, and Inventory Control to develop and utilize a qualified RTV program.
- d. Maintain all waste records for a minimum of three years.
- e. Ensure all storage limits for waste are adhered to, and that SAAs are approved by the Installation HWPM before waste is generated.
- f. Continuously review work processes for changes, modifications, or material substitutions and inform General Manager/Manager of such changes as they relate to waste generation.
- g. Ensure that all spilled items are properly identified at the point of generation and HW are properly managed.
- h. Ensure only approved containers are used to store waste.

SECTION 5 – HAZARDOUS MATERIAL MANAGEMENT PROCEDURES

Every person who produces, packages, handles, treats, or transports hazardous waste shall have received applicable Navy Occupational Safety and Health (NAVOSH) training. Proper personal protective equipment (PPE) and control measures must be in place before handling HM. In addition to the two sources below, contact the activity's Safety representative for additional information on HM management.

a. Detailed information on training and other requirements related to this guidance can be found in OPNAVINST 5090.1C, available at:

<http://doni.daps.dla.mil/Directives/05000%20General%20Management%20Security%20and%20Safety%20Services/05-00%20General%20Admin%20and%20Management%20Support/5090.1C%20CH-1.pdf>

b. Additional applicable HM management guidance is provided in OPNAVINST 5100 (series), Navy Safety and Occupational Health Instruction, available at:

http://www.public.navy.mil/navsafecen/Pages/instructions/OPNAV_Policy.aspx

SECTION 6 - ENVIRONMENTAL MANAGEMENT SYSTEM, WASTE MINIMIZATION, & POLLUTION PREVENTION

6.1 Environmental Management System (EMS)

This instruction provides guidance on the Implementation and Operation Phase of the EMS (Figure 6.1) that facilitates long-term mission sustainability by focusing on reducing negative environmental impacts/risk and continually improving environmental performance throughout the installation. This includes day-to-day compliance activities such as sampling, reporting, recordkeeping, and training, as well as working to achieve the objectives, targets, and action plans set during the Planning Phase of EMS.

Installations shall define and delegate specific roles and responsibilities, implement work instructions and operating procedures, and provide training to ensure personnel understand their responsibilities and can perform their tasks appropriately. Commands shall track performance toward meeting environmental sustainability performance measures and Executive Orders, as well as the Department of Defense (DOD) and Department of the Navy (DON) sustainability goals; and determine return on investment and reduction of environmental impact.

With respect to each activity, Managers and Waste Coordinators/Alternates can support and implement EMS in the following ways:

- a. Ensuring that the CO's Environmental Policy statement is communicated to all personnel and/or is posted in area where employees congregate.
- b. Communicating the installation's objectives, targets, and milestones to staff; and implementing job-related measures in observation of these.
- c. Identifying site-specific significant aspects and corresponding objectives, targets, and milestones.
- d. Ensuring that all roles and responsibilities are clearly defined, and personnel are aware of all documentations, training, and reporting requirements associated with their jobs.

e. Continuously evaluating departmental operating procedures and finding ways to promote conservation and P2 in daily activities.

f. Know what to do and who to call in case of an environmental emergency, such as a major spill.

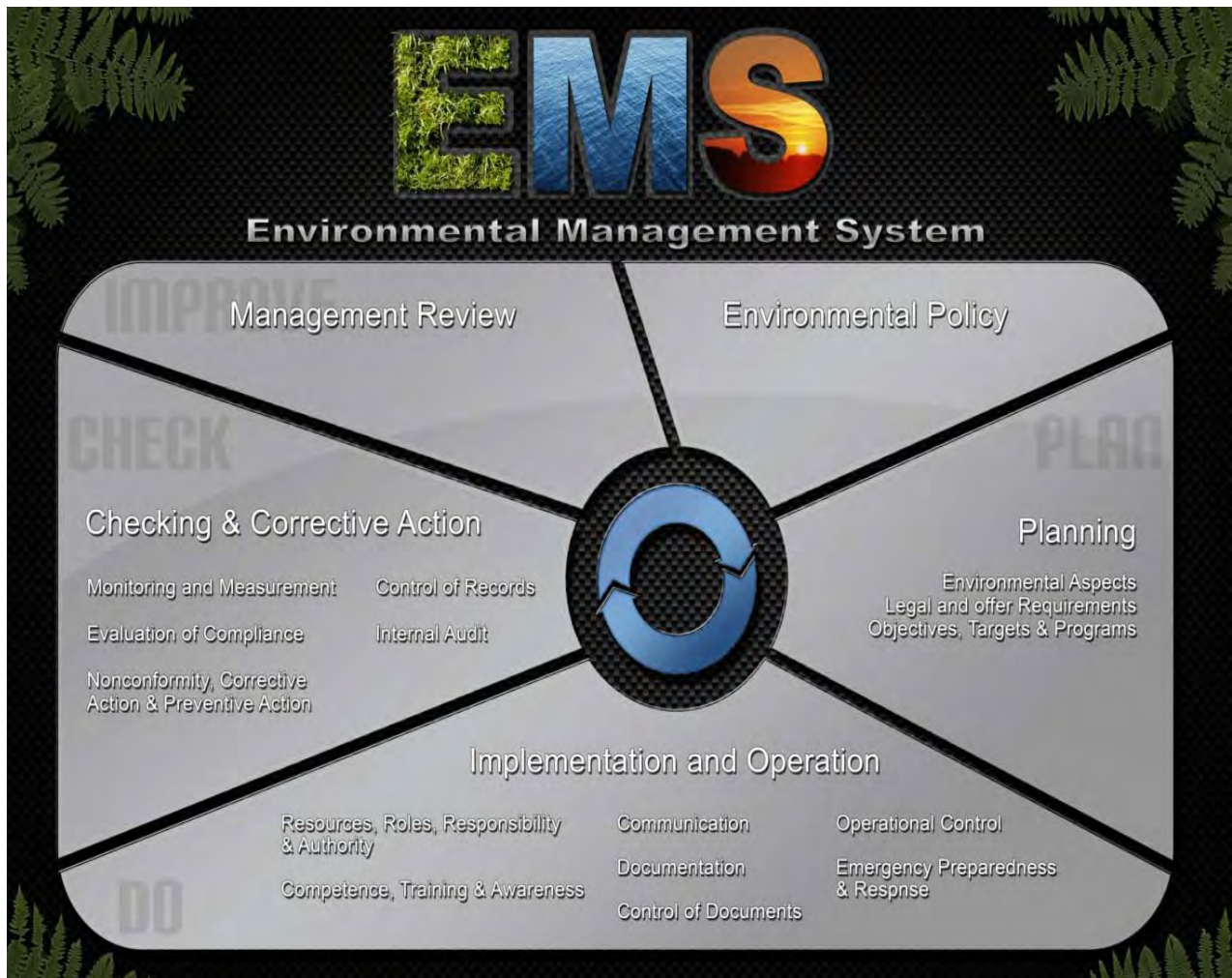


Figure 6.1 Environmental Management System (EMS)

6.2 Waste Minimization/Pollution Prevention (P2)

The Pollution Prevention (P2) Act established the national policy that affects all operations or processes that generate pollutants, hazardous or toxic waste, stating "pollution should

be prevented or reduced at the source whenever feasible, pollution that cannot be prevented should be recycled or treated in an environmentally safe manner, with disposal being the last option." To reduce the amount of hazardous waste generated, commands need to evaluate which processes or operations cause the generation of waste and what steps, process changes, chemical substitutes or modifications can be implemented to reduce or eliminate the generation of hazardous waste.

Once a PPCP or HM is deemed non-saleable, it is the responsibility of the activity to determine if such item can be managed using available P2 resources or programs before it is deemed a waste. An extensive effort shall be made to determine if a HM is usable before it may be disposed of as a waste.

Suggestions for minimizing waste generation and utilizing good inventory practices include, but are not limited to:

- a. Using older materials first
- b. Checking expiration dates continuously
- c. Ordering only what is required
- d. Purchasing less toxic or non-HM when possible.

SECTION 7 – MANAGEMENT OF NON-SALEABLE MERCHANDISE

7.1 Return to Vendor (RTV) Program Overview

If the merchandise is non-saleable, and it qualifies for the RTV program, every effort shall be made to ensure transparency, adequate record keeping, and compliance with all regulatory guidance related to containerizing, storage, and transportation of such items.

It is the responsibility of the generator of these non-saleable items to ensure that the vendor/contractor accepting the returns is also complying with applicable environmental regulations of the generator's location. This include, but is not limited to: ensuring that the vendor/contractor is not managing the returned merchandize as waste, and that if a request is made by a Compliance Inspector or other authorized person to view documents associated with the return process, such documents are readily available.

7.2 Benefits of an Effective Return to Vendor Program

Advantages of an effective and comprehensive RTV Program at activities which come in contact with PPCPs and HM may include the following:

- a. Take-back contract provisions will require vendors to take physical and/or financial responsibility for sustainable management methods.
- b. Decreases potential for environmental liability.
- c. Helps promote waste minimization and P2 goals.

7.3 Return to Vendor Program Requirements

In addition to other internal company and organizational policies closely related to this program, such as safety and loss prevention, a qualified RTV Program shall include, but is not limited to the following:

- a. Complies with all laws and regulations protecting the environment, and does not adversely affect human health or the environment.

b. Holds vendors to the same standards of environmental compliance.

c. Have in place a process to document and retain all records associated with this program.

d. Ensures that vendors managing the RTV pick-ups are appropriately trained in receiving, packaging, and transportation of HM.

It is essential that the RTV representative (vendor/contractor) demonstrate to the user that items "taken back" by the RTV program are managed in a manner that complies with all applicable local, state and federal regulations. In the past, some RTV representatives have "taken back" regulated items from retail operations, only to dispose of these items in the dumpsters on the installation. In the eyes of the law, this is not a valid RTV program and the installation is exposed to liability for the illegal disposal.

SECTION 8 - WASTE STREAM DETERMINATION

8.1 Classification and Disposition

The CNRSW policy regarding the classification and disposition of PPCP/HW is based on the assumption that **all** the consumer products in the following categories could be subject to HW regulations; and are therefore, subject to federal/state HW management and disposal guidelines until such time that the product manufacturer provides testing results from an accredited Environmental Standards Laboratory to prove otherwise.

a. Affected consumer product categories:

- Baby care products
- Bath products
- Cosmetics
- Detergents/Soaps
- Fragrances
- Hair care products
- Household cleaners
- Household maintenance
- Nail products
- Over-the-counter (OTC)/non-prescription medications
- Personal cleanliness products
- Pet care/veterinary supplies
- Shaving products
- Skin care
- Suntan/sunscreen

b. A complete listing of the sub-categories developed in accordance with guidance from the Personal Care Products Council is found in Appendix B. Vendors should be contacted to ascertain if the products in question do have accredited test results (HW Characterization) conducted by the manufacturer, distributor, or other responsible party, that can be used to determine how the non-saleable item will be managed and disposed of as HW. Examples of this include testing for ignitability, corrosivity, reactivity, and toxicity (such as the Federal Toxicity Characteristic Leachate Process). An example of State testing would be the California Bio-Assay.

c. MSDS, also known as SDS under the Globally Harmonized System (GHS) which commences being phased in on 1 December 2013, only provide information for safe handling and use of the specific product in question. An MSDS does not provide specific

information related to whether or not a product is a federal RCRA HW or a state non-RCRA HW. Additionally specific HW guidance documents are listed in the CNRSW Hazardous Waste Management Plan, located at:

http://www.cnrc.navy.mil/regions/cnrsw/om/environmental_support/environmental_core_support.html

Specifically, quick reference guidance documents are available which will provide detailed guidance on the proper management and disposal of the following:

- Hazardous materials management
- Used Absorbents
- Used oil management
- Automotive type spent lead-acid batteries
- Drained used oil filters
- Expired chemicals and materials
- Dumpster and landfill restricted items
- Hazardous waste and special waste manifesting
- Oily rags and debris
- Pesticide container management
- Compressed gas cylinders
- Aerosol container management
- EPA ID Numbers and manifest signature authority

SECTION 9 – PHARMACEUTICAL, PERSONAL CARE PRODUCTS, & HAZARDOUS WASTE MANAGEMENT

9.1 Waste Identification

Proper identification is critical because it determines how the waste will be managed from the point of generation to the point of disposal (from “cradle to grave”). It also helps ensure environmental compliance and reduces the potential for violations and/or fines.

PPCP/HW waste identification shall be based on: knowledge of process; manufacturer, distributor, or responsible party’s certification/literature; MSDS; if it’s a listed RCRA hazardous waste; or meets the definition of a state regulated waste. Guidance for California state-specific regulated HW and MW can be found in CNRSW Waste Management Plan.

Activities subject to this SOP may request guidance from the installation’s HWPM when determining the appropriate HW characterization, based on available documentation provided by vendors or manufacturers. Therefore, a copy of the current MSDS, SDS, or other manufacturer literature shall be provided to the HWPM, along with any other documentation that would assist in proper waste characterization, whenever such assistance is requested.

In some cases, it may be necessary to conduct HW characterization testing via NAVFAC SW Environmental Laboratory Services. In such instances, the cost for these services shall be borne by the generator.

For management of universal waste (UW), guidance is provided in Appendix D. Detailed information on the waste determination process is fully outlined in the CNRSW Waste Management Plan.

9.2 Waste Segregation

If there is a leak or spill, proper segregation of waste containers and items used in the clean-up process such as rags and absorbents, prevents incompatible chemicals from reacting that would have potentially resulted in fires, toxic gaseous releases, or explosions. While safety is the main concern, improper mixing of solid wastes through inappropriate bulking or consolidation may also render the subsequent mixture difficult to identify and more expensive to dispose.

Do not place **ignitable**, **oxidizers**, and **corrosive** wastes on the same tank pallet or storage bay without a separation device. These wastes must be separated to avoid chemical or physical reactions if they become mixed. If possible separate waste by hazard class (wastes that pose the same type of hazard). Ignitable and reactive wastes must be stored at least **50 feet** from the base property line. In general, incompatibles should be physically segregated from each other during storage and marked with appropriate warning signs. Check with Occupational, Safety and Health (OSH) Departments for other applicable workplace safety practices for incompatible chemical storage.

9.3 Waste Storage/Management

There are specific regulatory procedures for the storage and management of hazardous waste. Figure 9.1 outlines the basic procedures for PPCP/HW waste management. Contact the activity's Waste Coordinators for additional details on proper storage.

If a particular PPCP falls into the category of a state regulated medical waste, it shall be managed as such. There are specific regulatory requirements for the storage and management of medical waste. Contact the activity's Waste Coordinators, consult the installation's Environmental Office, or refer to CNRSW Waste Management Plan for details on labeling, storage limits, and storage conditions.

9.4 Records Management

All records related to waste disposal shall be retained on site for a minimum of three years and available for review. Records include but are not limited to: logs; manifests; bills of lading; waste-turn-in forms; profile sheets; any RTV receipts/documents; and relevant information regarding the disposal site. Information about records management can be

found in Appendix C (Requirements of Waste Management), or CNRSW Waste Management Plan.

FLOWCHART: DETERMINE THE DISPOSAL METHOD FOR MEDICAL-RELATED PRODUCTS AND SUPPLIES

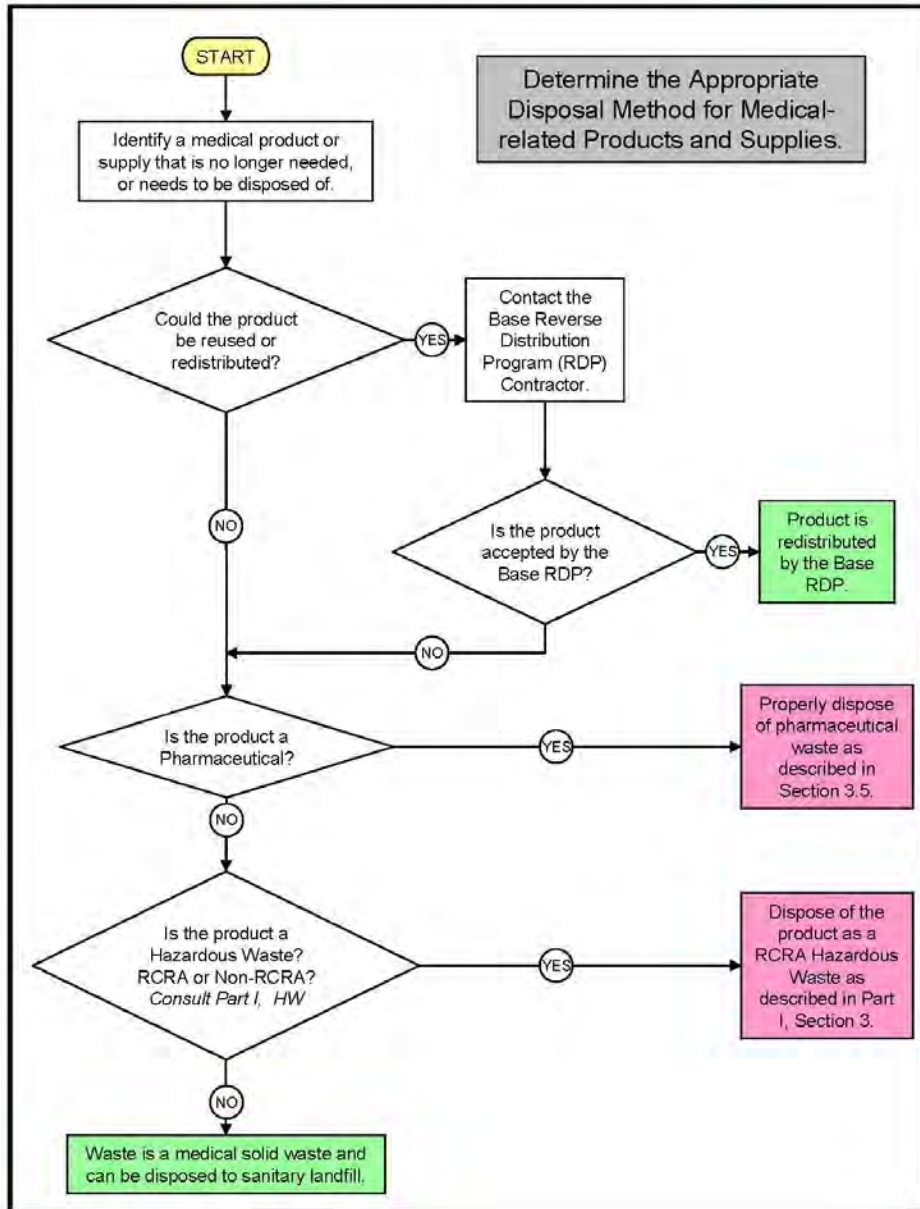
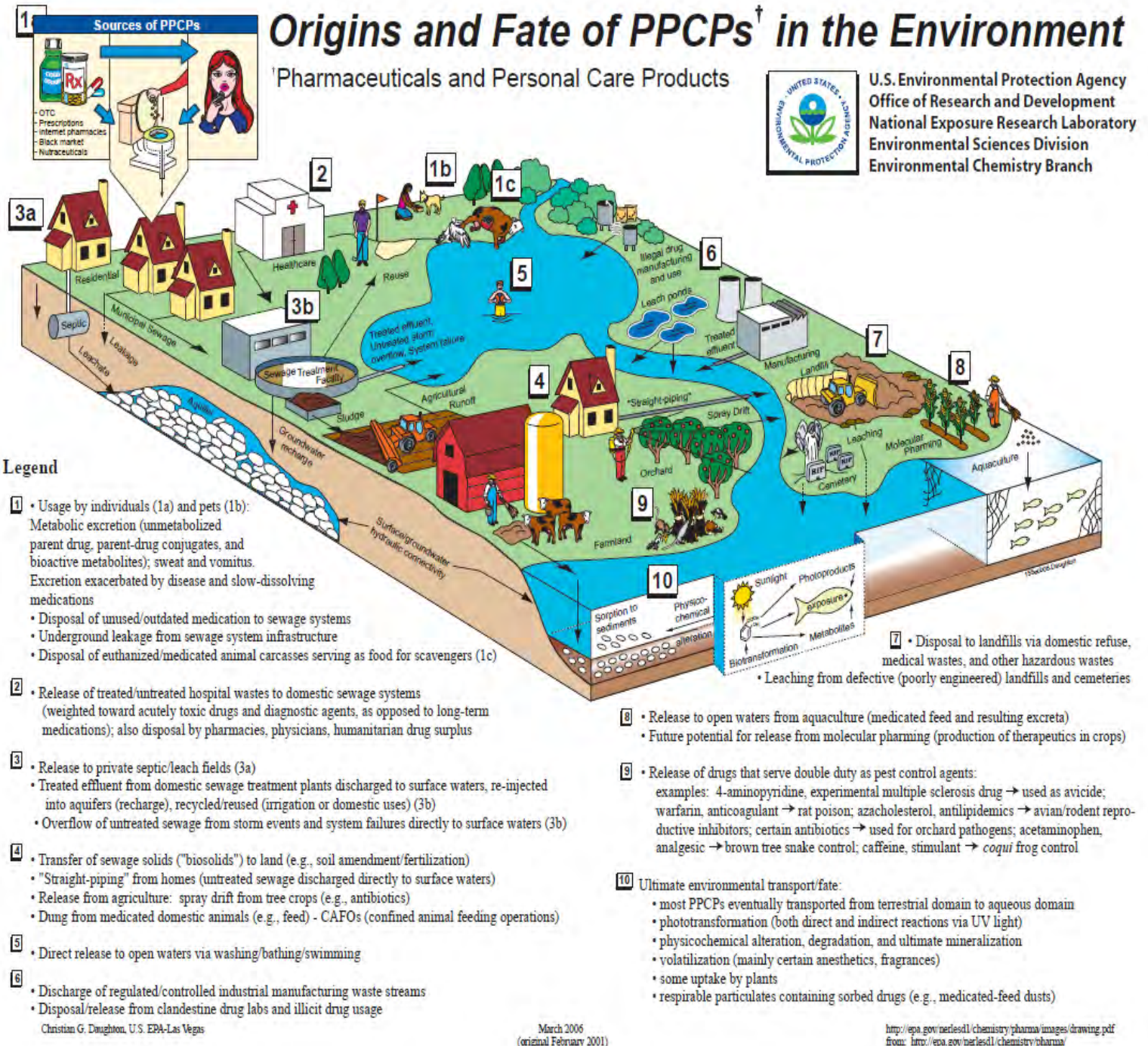


Figure 9.1

ORIGINS AND FATE OF PPCPs IN THE ENVIRONMENT



Consumer Product Classes and Typical Constituents

Consumer product classes and typical constituents in accordance with Personal Care Products Council guidelines:

<http://www.cosmeticsinfo.org/index.php>

Classification

Baby Products

Baby Lotions, Oils, Powders, & Creams
Baby Shampoo

Bath Products

Bath Oils, Tablets, Salts, & Capsules
Bubble Bath

Makeup

Eyebrow Pencil, Eyeliner, Eye Color, Remover, & Mascara
Cheek color, Face Powder, & Foundations
Lip Color & Concealers

Fragrance

Colognes, Perfumes, & Fragrance Mists
Dusting Powders or Body Powders

Hair Care

Shampoo/Conditioners, Sprays, Tonics, & Dressings
Permanent Waves, Straighteners, & Relaxers
Hair Dyes, Colors, Tints, Rinses, & Bleaches

Nail Products

Cuticle Oils, Creams, & Lotions
Polish, Enamel, & Remover
Manicure/Pedicure Products & Nail Extension Products

Oral Care

Tooth Paste
Mouthwashes & Breath Fresheners

Personal Cleanliness Products

Soap

Antiperspirants/Deodorants

Douches & Feminine Hygiene

Shaving

Aftershave Lotion

Preshave Lotions

Shaving Cream & Soap

Skin Care

Face/Body/Hand Creams & Lotions

Cleansers & Moisturizers

Foot Powder & Spray

Suntan/Sunscreen

Sun Block & Sun Screen Gels, Creams, & Liquids

Sunless Tanners

Vet Supplies/Pet Care

Flea Powder & Medications

Detergents/Soaps

Hand Soaps & Sanitizers

Dish & Laundry Detergents

Fabric Softeners

Automotive

Oils & Transmission Fluids

Windshield Wiper Fluid

OTC Medications/Prescriptions/Allergy Treatment

OTC Medications, Ointment & Powders

Epinephrine Pens

Household Cleaners

Floor Cleaners, Wax, or Varnish

Glass & Multi-surface Cleaners

Air Fresheners

Lawn & Garden

Pesticide/Herbicide
Fertilizer

Office Supplies
White-out
Inks
Compressed Air Canisters
Glues

Requirements for Waste Management

Identified personnel, designated as the shop waste handler or coordinator and with the appropriate title and written job description, who subsequently:

a. Attend initial waste generator training and annual refresher training.

b. Provide annual training for all assigned shop personnel regarding Hazardous Material Business Plans and emergency procedures, and any shop level waste management requirements.

c. Maintain a current Hazardous Material Business Plan at your location. Notify the appropriate authority when:

(1) Waste accumulation areas, or

(2) New processes are added that generate hazardous waste.

d. Maintain records for work center personnel. These records shall include job descriptions, business plan training muster sheets and any waste training certificates for **"three" years**.

e. Maintain waste records, copies of manifests, lab analyses or other information regarding waste determination and disposal, Return to Vendor documentation for **"three" years**.

f. Coordinate Return to Vendor (RTV) pick-ups.

Coordinate hazardous waste pick-ups for disposal with an authorized disposal facility within applicable waste accumulation framework.

g. Ensure all hazardous material containers are properly closed, labeled with the contents and the container is in good condition. All hazardous materials with expired non-extendable shelf life must be used, recycled, returned or managed as hazardous waste within **"one" year** after the expiration date.

h. Ensure all empty hazardous waste/material containers are properly managed within **"one" year** (recycled, reused or disposed as hazardous waste) from the date the cor

Appendix C

- i. Containers greater than **five** gallons must be marked "**Empty**" and have the date when the container became empty.

- j. Conduct and document weekly inspections of the waste accumulation area, ensuring all containers are properly closed, labeled with accumulation start date, are not leaking or have accumulated liquid on the tops and are **not** accumulated for more than **90 days**. Weekly inspections shall be maintained for **one year**.

- k. Clean up, containerize, document and properly manage spills of hazardous substances when they occur.

Universal Waste Management

Universal wastes, are a frequently generated classification of Hazardous Waste, which are commonly used by wide ranging community from the general public to industrial processes or operations. These wastes have been granted less stringent waste management and storage requirements than other types of regulated hazardous waste. This less stringent approach allows the generator longer accumulation time to promote proper recycling, treatment or disposal of larger amounts of the specific wastes.

Currently in California, universal wastes are comprised of the following classifications of used, spent, or discarded:

- a. Batteries. The full range of dry cell batteries regardless of size. This does not include spent lead-acid automotive type batteries managed under the provisions of the hazardous waste requirements.
- b. Lamps. All lamps, except incandescent lamps are included. All high intensity discharge, neon, mercury vapor, high-pressure sodium and metal halides lamps. Broken lamps shall be collected, containerized and managed as hazardous waste.
- c. Mercury Containing Items. All control devices, thermostats, dental amalgams, appliance switches, or any other type of devices or switches that contain mercury or ampoules of metallic mercury.
- d. Cathode Ray Tubes. Intact computer monitors, vacuum tubes, television picture tubes or similar type items that contain lead or any other regulated metal. Computer monitors should be returned to DRMO vice managed as hazardous or universal waste. However broken monitors shall be collected, containerized and managed as hazardous waste.
- e. Consumer Electronic Devices. Anything with a printed circuit board.
- f. Aerosol Containers. Although aerosol containers are classified as universal waste, these items shall continue to be managed as hazardous waste with the exception for transportation from off-site locations to a waste disposal facility or another universal waste handler.

Management & Storage

To maintain consistent hazardous waste management practices throughout CNRSW, and to simplify the waste management and training process for ashore commands hazardous waste personnel, universal waste generators should continue to properly manage and dispose of their universal waste through the CNRSW hazardous waste facilities.

a. Universal wastes must be recycled at an authorized facility, taken to a CNRSW hazardous waste facility or otherwise managed as hazardous waste and may **not** be placed or discarded in

solid waste (trash) containers. This includes fluorescent tubes broken or intact, thermostats or other switches that contain mercury ampules or any type of wet or dry cell batteries.

b. All universal wastes shall be segregated and stored under the requirements for hazardous waste management, and not be accumulation for longer than **six months** at the generator location.

c. Broken lamps, tubes, thermometer or other universal wastes items shall be containerized and managed under hazardous waste requirements of Section 3.4 of Commander, Navy Region Southwest's Waste Management Plan San Diego Metro Area.

Labeling and Marking

a. Each universal waste item that is not in a container and/or each container shall be labeled.

b. Each label shall be identified as "Used", "Waste" or "Universal Waste" followed by the type of universal waste being disposed (i.e., "Used Batteries", "Waste Lamps", Universal Waste-Cathode Ray Tube").

c. Each label shall also have the accumulation start date placed on it, identifying the date that the waste became a Universal Waste.

d. Hazardous waste labels shall not be used when labeling universal wastes for transportation or disposal.

Transportation and Record Keeping

a. Universal wastes may be transported to another universal waste handler or authorized disposal facility without using a hazardous waste manifest. However, the transporter must comply with Department of Transportation (DOT) shipping requirements for hazardous materials by using a bill of lading (BOL) or other approved shipping document. In addition, universal wastes shall not be classified as hazardous waste or waste on the shipping document.

b. Shipping documents shall be maintained at the generators location for three years from the date of shipment, to include the following information:

- (1) Name and address of generator
- (2) Quantity and type of each universal waste shipped
- (3) Date of shipment from the facility