



PART I

HAZARDOUS WASTE MANAGEMENT

PART I

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PART I

HAZARDOUS WASTE GUIDANCE DOCUMENTS

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Dumpster & Landfill Restricted Items	Painted Construction Debris
Ship-To-Shore Offload Procedures	Hazardous Waste Addendum for Paints & Painted Debris
Used Oil Management	Resins, Urethanes & Epoxy Paints
Drained Used Oil Filters	Latex Paint & Debris
Oily Rags & Debris	Low Level Radioactive Wastes (LLRW)
Used Absorbents	Electronic Waste
Automotive Type Spent Lead-Acid Batteries	Fluorescent & H.I.D. Lighting Wastes
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Abrasive Blast Media	Hazardous Materials Management
Process Ash Residuals	Pesticide Container Management
PCB Management	Aerosol Container Management
PCBs in Caulk	Contaminated Containers
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	Waste Leather Product Management
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INTRODUCTION

Commander Navy Region Southwest (CNRSW) Environmental Program's goal is to be recognized for its leadership and excellence in environmental protection, pollution prevention and compliance while effectively executing fleet support functions and shore based operations for national defense. The CNRSW Environmental Program mission is committed to providing environmental support and technical guidance that maximizes the operational flexibility for command operations in a manner that emphasizes the protection of the environment and compliance with hazardous waste laws.

To accomplish this mission and obtain our goal, the CNRSW Hazardous Waste Program Office provides a personal commitment, resource management, and technical knowledge in order to strive for environmental excellence for the protection of the environment, and provide maximum support to shore based and afloat communities.

Environmental laws and regulations have increased exponentially in recent years. General hazardous waste management requirements are specified in federal, state and local laws and regulations. For example, Title 40, Code of Federal Regulations (CFR), Title 22, California Code of Regulations (CCR), California Health and Safety Code (HSC) and San Diego County Code of Regulatory Ordinances. Because sovereign immunity has been waived for hazardous waste requirements, Commands located on CNRSW are required to comply with these standards. Military installations are routinely inspected for compliance with these requirements by the California Environmental Protection Agency (Cal-EPA) [Department of Toxic Substance Control](#) (DTSC), the San Diego County, Department of Environmental Health (DEH), and on occasion, by the U.S. Environmental Protection Agency (U.S. EPA). Each regulatory agency has their specific jurisdiction regarding hazardous waste compliance. In addition, these agencies, through enforcement actions are authorized to issue Notices of Violation (NOV) for issues of non-compliance. If violations occur, fees or fines can be levied against the overall Navy, the specific effected command, or the individual responsible for causing the violation.

Normally, state and local regulatory agencies have more stringent environmental requirements and policies than those established by federal law. To identify and comply with these more stringent requirements, specialized knowledge and expertise are required. CNRSW Hazardous Waste Program Office through the information provided within this Hazardous Waste Management Plan (HWMP) will help your command identify and understand your responsibilities for compliance with hazardous waste requirements.

Compliance with environmental requirements is mandated by the Federal Facilities Compliance Act, signed into law in 1992 by then President Bush. Additionally, operational guidelines are established within OPNAVINST 5090 (series), along with other DoD and DoN Policies. Therefore, compliance with these requirements is mandatory, not only by directive, but also as a good environmental steward in the role of leadership.

SECTION 1 - HAZARDOUS WASTE MANAGEMENT PLAN ADMINISTRATION

1.1 Purpose

- a. To provide CNRSW commands and activities military and civilian personnel with an environmental reference document to support overall hazardous waste management by defining your responsibilities “as **generators of hazardous waste**” relating to hazardous materials/waste accumulation, storage, record keeping, training and disposal issues. Additionally, this document will establish an effective waste management program for hazardous waste compliance for all areas under the cognizance of the Admiral.
- b. The requirements specified within part I of this plan only reflect the provisions for non-explosive hazardous waste. **Explosive hazardous waste requirements are identified in the Commander Navy Region Southwest, Explosive Hazardous Waste Management Plan**, or established installation plans and policies.

1.2 Command Responsibilities

- a. Commands whose operations or processes generate [hazardous waste](#) and or maintain less than 90-day hazardous waste [accumulation areas](#) or operate [satellite accumulation areas](#) must comply with all federal, state and local hazardous waste laws and [regulations](#).
- b. Become familiar with any environmental permits and their provisions that may apply to their operations or processes, and recognize the responsibilities of a hazardous waste generator relating to the “[cradle to grave](#)” hazardous waste disposal requirements.
- c. [Appoint in writing](#), personnel that are designated as the command or shop hazardous waste coordinator, who will be responsible for handling of hazardous waste for that area. These may be collateral duty positions, but their tasking must be prioritized to allow them to serve as a point of contact in matters regarding hazardous waste and related environmental issues.
- d. Ensure all command personnel assigned to hazardous waste operations complete a program of classroom instruction or on-the-job training as identified in [Section 3-5](#) within 6 months after being assigned their duties. This training must also include an annual refresher, which addresses the specific duties and responsibilities being performed by the individual.
- e. Maintain at each generator location, [records](#) for hazardous waste turn-in, waste profile sheets, laboratory analysis, copies of manifests or any other information relating to hazardous waste determination or disposal.
- f. Maintain at each generator location, copies of environmental training records, designation letters and waste handler certificates for personnel currently and previously involved in

hazardous waste operations. These records shall also include annual [Hazardous Material Business Plan](#) (HMBP) training and any other documented hazardous waste training.

- g. Coordinate with the CNRSW [Environmental Program](#) and the Navy On-Scene Coordinator (NOSC) immediately after a spill to provide all necessary clean-up, disposal and /or reporting information to ensure proper compliance with applicable hazardous waste laws and regulations.

1.3 CNRSW Environmental Program Responsibilities

Shall research, develop and disseminate hazardous waste instructions and guidance, serve as the primary point of contact to regulatory agencies, and provide oversight for the overall management of hazardous waste. This includes, but is not limited to:

- a. Advise commands on changing environmental laws, regulations or other requirements that will effect or potentially adversely impact command specific hazardous waste operations or processes.
- b. Request funding from higher echelon commands for containerized hazardous waste disposal, storage area permits, hazardous waste analysis and hazardous waste generation fees.
- c. Submit documentation for hazardous waste accumulation area permits and Hazardous Materials Business Plans, including plan or site map modifications or site closures to the DEH.
- d. Develop and disseminate appropriate guidance and instructions on the proper management, storage and handling of hazardous waste.
- e. Act as liaison to address CNRSW specific questions or concerns on hazardous waste management issues, CNRSW policy or guidance, Unified Facility Permits, Tiered Permitting or other issues relating hazardous waste operations.
- f. Coordinate submittal information for required environmental reports or data calls such as: [EPCRA](#), P2ADS and biennial reports to the appropriate regulatory agencies or naval activities.
- g. Conduct oversight inspections for host and tenant commands relating to specific areas of environmental compliance under applicable hazardous waste standards.

1.4 Contractor Operated Hazardous Waste Facilities

- a. The Naval Facilities Engineering Command Southwest (NAVFAC-SW) is the primary contracting organization responsible for the proper operation, transportation, storage and disposal of hazardous waste via the permitted hazardous waste facilities at CNRSW Metro installations. These operations have been outsourced under Navy contract to various public waste management companies. This includes the operation of RCRA permitted

hazardous waste storage facilities, an accredited analytical laboratory, and several bilge and oily waste treatment systems (BOWTS).

- b. To the maximum extent feasible, all hazardous wastes or substances should be disposed of through the NAVFAC-SW operated hazardous waste facilities in accordance with their waste acceptance requirements. Hazardous waste turn-in procedures are provided in [Section 3.10](#).
- c. Any customer services issues that arise associated with analysis/transportation/storage/treatment/disposal of hazardous waste should be addressed directly to the appropriate NAVFAC-SW Subject Matter Experts (SME). See [Appendix 6](#) for contacts and phone numbers.

SECTION 2 - REGULATORY AUTHORITY & REQUIREMENTS

2.1 Overview

CNRSW military and civilian personnel must be aware of the environmental laws and regulations which pertain to their specific process or operation which generate, store, treat or dispose of hazardous wastes. These requirements have been established and mandated by federal, state or local law and are not discretionary. Cited below are the environmental laws and requirements that outline the major components of overall hazardous waste management program.

2.2 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. The law requires safe and secure procedures to be used in treating, transporting, storing and disposing of hazardous waste. RCRA also addresses “[cradle to grave](#)” hazardous waste management, establishes the duties and responsibilities of hazardous waste generators regarding the storage, treatment and disposal of hazardous waste, and authorizes the EPA to issue corrective actions clean-up orders for hazardous waste releases.

2.3 Comprehensive Environmental Response, Compensation & Liability Act (CERCLA)

Federal law authorizes U.S. EPA to manage and respond directly to releases of hazardous substances that may endanger public health or the environment. Imposes strict liability for environmental clean-up on persons whose actions caused the release, and requires immediate reporting to the National Response Center on hazardous substances or chemical releases exceeding the Reportable Quantity (RQ) limitations. The Superfund Amendments and Reauthorization Act (SARA) were enacted in 1986 to amend the provisions of CERCLA. SARA Title III, is the Emergency Planning and Community Right-to-Know Act of 1986 or (EPCRA). **EPCRA** requires each state to have an emergency response plans, and any company that produces, uses or stores more than certain amounts of listed chemicals must meet emergency planning requirements, including release reporting. EPCRA also focuses on hazards associated with toxic chemical usage and release data, and includes notifications of listed chemical usage to federal, state and local regulatory agencies.

2.4 Federal Facilities Compliance Act (FFCA)

Enacted by presidential proclamation in 1992 this law expands the enforcement authority of Federal, State and local regulators with respect to hazardous waste management and other relevant areas of environmental compliance at federal facilities. Requires the payment of fees for service, assessed in connection with hazardous waste regulatory inspection programs, or

for the amount of hazardous waste generated at the facility. Waives government sovereign immunity, allowing regulatory agencies to issue fines and penalties for violations on issues of non-compliance.

2.5 Code of Federal Regulations (CFR)

Title 40, CFR is formed from the requirements of RCRA, CERCLA, TSCA and several other specific environmental legislation. 40 CFR is overseen and enforced throughout the U.S. and its territories by the U.S. EPA, and by most state and local regulatory agencies. From these regulations, come the management standards applicable for hazardous waste, spill notification and required reporting, including exclusion and exemptions from hazardous waste management requirements.

2.6 California Health and Safety Code (HSC)

As with RCRA being federal law, the Health and Safety Code is state law. Within the aspects of state law, or statute, each state, has the ability to meet or exceed the standards specified by federal law. California has far more stringent environmental requirements than the federal regulations. In addition, under the HSC an entire classification of hazardous waste exists. These state specific hazardous waste classifications are known as Non-RCRA, meaning the waste or series of wastes are not addressed or enforced under the provisions of RCRA, but are hazardous waste none the less within California, and must be managed accordingly.

2.7 California Code of Regulations (CCR)

Title 22, CCR is the state equivalent of 40 CFR, but only specifically addresses hazardous waste management, and some aspects of hazardous materials that are improperly labeled or stored. Again, Title 22 is far more stringent than the federal counterpart, to the point, if compliance is achieved under Title 22, most, if not all of the federal regulations governing hazardous waste management will also be achieved. Title 22 also addresses California specific waste determination testing, storage and inspection requirements, presumed wastes, and waste management requirements.

2.8 Local Environmental Requirements

San Diego County, Department of Environmental (DEH) acts as the Certified Unified Program Agent (CUPA) under authorization from Cal-EPA to implement state environmental requirements. Under these aspects city/county ordinances were enacted to manage hazardous waste/materials, medical waste, underground tanks, etc. In some cases these ordinances exceed state requirements or require special requirements such as the Unified Facility Permits for hazardous waste accumulation areas.

SECTION 3 - HAZARDOUS WASTE MANAGEMENT

3.1 Hazardous Waste Determination

- a. Once a hazardous material, substance or residue is discarded, abandoned, or is no longer usable for its intended purpose, it becomes classified as a waste. The waste classification is contingent on the properties of the material and any associated hazard obtained during the process or usage. Hazardous waste is any hazardous material, substance or residue, which is spent, off-specification, expired, retrograde or non-recyclable or due to the concentration, toxicity, physical or chemical characteristics meets or exceeds the threshold limitation levels identified in environmental regulations, or any waste substance that may cause or significantly contribute to death, serious irreversible illness or pose a substantial present or potential hazard to human health or the environment.
- b. Hazardous wastes are identified and classified under several different and distinct sets of waste streams, and waste management requirements. The Federal hazardous waste classification system uses specific listing (F, K, P, and U) and characteristic testing to determine if a waste is **RCRA** hazardous waste. California has additional listing and testing criteria that captures more wastes. These are identified as **Non-RCRA** hazardous wastes. All hazardous waste generators in California must comply with both RCRA and Non-RCRA hazardous waste requirements. This waste classification is important based on the disposal process and waste acceptance criteria of the receiving facility. Furthermore, several wastes may be managed as Universal Wastes (UW) and some non-hazardous wastes must be managed under the requirements of Special Waste (SW), as identified in [Part II](#) of the HWMP. Based on waste determinations, all wastes must be classified into one of these categories, or be managed as non-hazardous solid waste (trash) under the requirements of RCRA Subtitle D.

3.2 Hazardous Waste Analysis

- a. The [generator](#) must determine either by laboratory analysis or user (generator) knowledge that the waste or expired substance or material is to be managed as a hazardous or non-hazardous waste. The EPA publication, SW-846, entitled, Test Methods for Evaluating Solid Waste Physical/Chemical Methods provides test procedures and guidance for making waste determinations. Based on volume and variability, a minimum of *four* [representative samples](#) of the waste substance or waste must be analyzed to determine with statistical significance, if the specific waste can be classified and non-hazardous. In addition to the SW-846 testing methods, waste analysis specific to California standards include the [Total Threshold Limit Concentration](#) (TTLIC), and [Solubility Threshold Limit Concentration](#) (STLC), and a 96-hour acute bioassay. After performing the hazardous waste determination and characterizations, summarized in a “profile”, the generator must properly treat, store, recycle or dispose of the waste in accordance with all applicable environmental laws and regulations.

- b. Applying user knowledge for waste determination is adequate if the suspected waste is to be managed and disposed of as hazardous waste. However, for a waste to be managed as non-hazardous, the application of this type of waste determination, or management practice must have a scientific or analytical backing, or other means of being quantifiable. Waste determination and classification without foundation, or another form of defensible position or other clinical data is subject to extreme scrutiny from regulatory agencies. In cases where waste classification and management is questionable, the regulatory agency can, and will, sample the suspected waste for analysis.

3.3 Hazardous Waste Characteristics

- a. A waste becomes classified as a RCRA or non-RCRA hazardous waste when the characteristic or hazardous property of the waste meets or exceeds the regulatory limits set for ignitability ([flash-point](#)), corrosivity ([pH](#)), reactivity or toxicity ([heavy metals](#) or [bioaccumulative](#) substances).
- b. Hazardous wastes are identified, classified, and segregated by characteristics or hazardous class. Although most wastes have only a single characteristic, some wastes exhibit multiple hazards, such as being both ignitable and reactive or toxic and corrosive.
- c. It is important to know what the waste characteristic or hazards are when handling, selecting containers, placing the waste into storage, or selecting a location for your accumulation area. The following standards apply to both [RCRA](#) and [non-RCRA](#) hazardous wastes, except when specified otherwise.

(1) [Ignitability](#): (D001) When a wastes, substance, residue or spent material exhibit any of the below characteristics, it becomes classified as ignitable hazardous waste.

- Is a liquid (other than an aqueous solution containing less than 24% alcohol by volume) and has a flash point of less than or equal to 140 degrees Fahrenheit.
- Is non-liquid and is capable under standard temperature and pressure to cause fire through friction, absorption of moisture or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard;
- Is an ignitable compressed gas as defined in 49 CFR (Department of Transportation)
- Is classified as an [oxidizer](#), as defined in 49 CFR (Department of Transportation).

(2) [Corrosivity](#): (D002) When a waste, substance, residue or spent material exhibits any of the below characteristics, it becomes classified as corrosive hazardous waste.

- Is an aqueous substance and has a pH of less than 2 or greater than 12.5.
- Is liquid that corrodes steel at a rate greater than ¼ inch per year.
- Is a solid that when mixed with equal parts of water, produces a solution with a pH

of less than 2 or greater than 12.5.

- Is not a liquid and when mixed with equal parts of water, produces a solution that corrodes steel at a rate greater than ¼ inch per year.

(3) **Reactivity:** (D003) When a waste, substance, residue or spent material exhibits any of the below characteristics, it becomes classified as a reactive hazardous waste.

- Is normally unstable and readily undergoes violent change without detonating;
- Reacts violently with water;
- forms potentially explosive mixtures with water;
- Forms potentially explosive mixtures when mixed with water.
- When mixed with water produces toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment;
- Is capable of detonation or explosive reaction when subjected to an ignition source, in heated confinement or under standard (normal) temperature and pressure.
- The substance or waste is a forbidden explosive, a Class A explosive or a Class B explosive as defined by the Department of Transportation 49 CFR.

(4) **Toxicity:** (D004-D043) When a waste, substance, residue or spent material exhibits any of the below characteristics, it becomes classified as a toxic hazardous waste.

- Meets or exceeds, by laboratory analysis, the standards for specific compounds known to be persistent and bioaccumulative. These compounds are specific heavy metals, organic compounds and pesticides. The federal analytical testing for these compounds is known as the Toxicity Characteristic Leachate Procedure (TCLP). In California testing is performed to compare results to the Total Threshold Limit Concentration (TTLC) and the Soluble Limit Threshold Concentration (STLC).
- Meets or exceeds, the lethal dose (LD) or lethal concentration (LC) standards under acute oral, acute dermal, acute inhalation, or acute aquatic toxicity testing.
- Contains any of the sixteen known human carcinogens in a single or combined concentration, equal to or greater than 0.001% by weight or 10 parts per million (ppm).
- Contains substances as shown by experience or testing, to pose a hazard to human health or the environment when released, discarded or disposed of (such as Freon).

(5) **Mixture Rule and Derived-From Rule and Dilution:** The “Mixture Rule” requires that mixtures of solid waste and federally-listed hazardous waste, must be regulated as hazardous

waste. The resulting mixture becomes classified as hazardous waste for the highest waste characteristics classification of which the mixture previously contained, even if the resulting mixture falls below hazardous testing. Wastes generated from the treatment, storage, or disposal of hazardous waste is referred to as “Derived-From” hazardous waste. These types of wastes include spill residues, sludges, and ash from incinerators. The Mixture and Derived-From rules do not apply if the listed waste was listed solely for failing the characteristics of ignitability, corrosivity or reactivity. Regardless, mixing or diluting wastes may also fall under the criteria as hazardous waste treatment, and are subject to treatment standards, which are expanded upon in [Section 3.8](#).

3.4 Hazardous Waste Accumulation Areas

Hazardous Waste or [Excluded Recyclable Materials](#) may be accumulated at the generator location for up to *90 days* or *1 year* at an authorized [satellite accumulation](#) area.

3.4.1 Storage & Segregation

Each 90-day accumulation area should, at the minimum, be constructed or utilize the following waste management practices.

- a. Impervious Base: The foundation of the waste accumulation areas should be impervious to spills or leaking waste, constructed of concrete, plastic or metal and be compatible with the waste being stored, with all cracks or gaps repaired or sealed.
- b. Containment Capacity: A [containment](#) system should be incorporated and designed to have the capability of containing the contents of the largest container of liquid waste plus 10% to prevent the release of hazardous waste into the environment.
- c. Drains: Storm or floor drains adjacent to, or drainage valves located within the accumulation area, should be covered, closed or sealed to avoid any possible release of waste, or contaminated rain water, into the storm drains, sewer system or surrounding environment. Also, identify where these drains will discharge in the event there is a release.
- d. Aisle Space: Adequate aisle space (2-3 feet minimum) shall be maintained between rows of pallets or containers to allow for inspections, container identification, spill clean up or emergency response personnel.
- e. Inspections: Personnel managing a 90-day waste accumulation area must conduct and document inspections of their facility at least *weekly*. Any hazardous waste storage tanks under their control must have documented *daily* inspection records identifying the tank and piping conditions, secondary containment or leaking substances. Leaking tanks or piping or containers must be repaired, replaced or over-packed immediately upon discovery.
 - “*Weekly Inspection*” is an inspection that is conducted at some point within every calendar week or about every 5-7 days. The weekly accumulation area inspection form in [Appendix 2](#) shall be used to conduct weekly inspections

- “*Daily Inspection*” means each operating day. An operating day is any day that personnel are in the work place conducting operations, or actually doing work, regardless if hazardous waste is being generated. The daily tank inspection form in [Appendix 3](#) shall be used to conduct daily inspections
- f. Waste Segregation: 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.
 - g. Security: Waste storage areas must be controlled, with limited access to unauthorized personnel. Warning signs should be posted identifying that location as a hazardous waste accumulation area.
 - h. Housekeeping: Spills, leaking containers/tanks, piping systems or puddles on top of drums must be contained and cleaned-up immediately. All trash, absorbent materials or other debris must be collected and disposed of properly.

3.4.2 Containers & Storage Tanks

- a. Labels: Hazardous wastes labels must be placed on containers or tanks as soon as the first drop of hazardous waste is placed inside. An example of a completed hazardous waste label is provided in [Appendix 9-A](#). Ensure each section of the label is properly and completely filled out with a water-resistant marker with the information indicated below.
 - Generator name & address
 - The word “Hazardous Waste”
 - Hazardous properties (ignitable, corrosive, toxic...)
 - Composition (oil & water, paint debris, solvent contaminated rags...)
 - Physical state (liquid, solid, gas..)
 - Accumulation start date
- b. Storage Time: Monitor the accumulation start date. Hazardous waste in containers or tanks **must not exceed the 90-day storage limit** unless they meet the requirements of a satellite accumulation area.

- c. Markings/Stenciling: Ensure all piping associated with hazardous waste storage tanks or piping systems associated with waste transfer operations are properly identified.
- d. Closed Containers: All [containers](#) or tanks must be *closed* unless waste is being added or removed. Ensure the containers have proper fitting and tightly secured lids, rings or bungs. Screw type funnels may be left attached if they have a one way check or ball valves or another type of securing cover to prevent spillage if the container tips over.
- e. Protect Against Accidental Ignition (Bonding/Grounding): In addition to eliminating obvious sources of ignition, to protect against electrostatic discharge (ESD) as an ignition source, storage areas that contain ignitable wastes (paints, solvents or fuels) must have these containers or tanks grounded during storage with bonding equipment available and used during liquid transfer operations. Bonding is the process of connecting two or more conductive objects with a conducting wire (i.e. copper), that equalizes the potential charge between them. Note that bonding does not eliminate the static charge. Grounding is connecting one or more conductive objects directly to the earth using ground rods, cold water copper pipes, or building steel. Unlike bonding, grounding drains the static charges away as quickly as they are produced. Consult with your federal fire representatives to ensure all bonding and grounding procedures meet the fire code.
- f. Empty Containers: Containers that held acutely or extremely hazardous material (P or U listed), regardless of size, must always be disposed of as hazardous waste. Used empty containers greater than *5 gallons* must be marked or labeled "empty" along with the date that the container became empty and managed (dispose or recycle) within one year of that date. Used empty containers less than 5 gallons may be placed in scrap metal or plastic bins. For more details, refer to ([Contaminated Container Guidance](#))
- g. Waste Bulking/Consolidation: Bulking is defined as the process of consolidating various quantities of the same type of waste by placing them into a single, larger container. During such operations, ensure that waste being consolidated or transferred is compatible with the container the waste will be consolidated or transferred into. Allow 2-3 inches for liquid expansion when temperatures rise and clean up any spills or puddles remaining on the top or sides of containers.
- h. [Compatibility](#): Ensure the waste that is placed into the containers will not react or cause damage to the container. Avoid placing corrosives into metal containers or using containers which previously contained an unknown substance.
- i. Damaged Containers: Use only containers that are structurally sound, in good condition and for substances for which the container was intended, preferably containers that meet DOT performance-based standards. Avoid using old, rusted or damaged containers. Waste in these types of containers must be repackaged. All containers holding hazardous waste must be managed in a manner to prevent leakage or spillage with secure fitting cap, lids or bungs and that is compatible with the type of waste that it is holding.

- j. Containment Sumps: [Sumps](#), and catch basins that contain or store hazardous waste are required to be managed as hazardous waste storage tanks, except if these containment devices are managed in accordance with the “emergency containment systems” requirements. Such devices systems must remain clean, empty and dry free of trash or other substances. Any accumulated rainwater, spilled or released hazardous waste, materials or substances must be removed in an expeditious manner, typically within 24 hours.
- k. Tank Certifications: All hazardous waste tank systems that accumulate, treat, or store hazardous waste must have an engineering assessment certification from an independent third party professional engineer registered in California. This assessment can be valid no longer than 5 years, upon which time a new assessment must be performed. The only exception are above ground used oil or waste antifreeze tank systems meeting specific criteria with a written request sent to the Certified Unified Program Agency (CUPA). The Federal Fire Department inspects the installation, usage and design and the CNRSW-HQ Environmental Office submits the appropriate forms to the CUPA for concurrence. An approved request is good for three years and the approval letter must be readily available for presentation during inspections.

3.4.3 Satellite Accumulation Areas

Satellite accumulation areas must be managed under the same requirements of 90-day sites with the exception of weekly inspections. In addition, **ALL** of the following apply:

- a. Hazardous waste must be accumulated in containers only, with volumes not exceeding **55 gallons** of a hazardous waste or **1 quart** of acute or extremely hazardous waste, per waste stream. On February 11, 1987, EPA clarified that normally only one RCRA waste shall be accumulated at each satellite area. However, DTSC allows a location to have one or more Non-RCRA waste streams in the same satellite area.
- b. The waste must be stored at the initial accumulation point, which must be at or near the area where the waste was generated.
- Initial accumulation point: waste cannot be stored at any other location prior to being stored in the satellite area. However, temporary storage may be allowed if the storage is necessary to that waste generation process, and if that waste is placed into the satellite accumulation storage area prior to the end of the work shift by the person that generated the waste.
 - At or near: the process generating the waste and the satellite accumulation area must be in the same or adjacent room or work area.
- c. The initial accumulation point must be under the control of the operator of the process generating the waste.

- Operator of the process: the “hands-on” operator of the machinery or process that generates the hazardous waste, not the overall operator of the generator site or facility as a whole.
 - Under the control: containers must be stored in the line of sight of the operator of the process generating the waste or in a locked room or compartment to which the operator can control the access.
- d. The initial accumulation start date must be clearly visible on the hazardous waste label for each container used to stored waste in the satellite area.
- Initial start date: the date that the first amount of hazardous waste was placed into the container.
- e. Wastes shall not be accumulated at the satellite area for any longer than **1 year** or until the maximum volume limitation (55 gallons or 1 quart) has been reached. However, the 1-year time period must not be exceeded.
- f. After reaching the applicable storage volume or time limitation (55 gallons, 1 quart, or 1 year) the container must be marked with the date that the limitation was reached.
- There will be 2 dates on the container or label, the initial start date (when the waste was first placed into the container) and the end date (when the time or volume limit was reached).
- g. Within 3 days after reaching the applicable volume, the waste container must be transferred or relocated to a 90-day hazardous waste storage area, or to an onsite or offsite RCRA-permitted storage facility. The total storage time limitation from initial accumulation start date to the disposal of hazardous waste from the generator location (entire installation) shall not exceed **1 year**, regardless of the volume in the container.
- If the container is transferred to a 90-day storage area before the 1-year time period expires, the container must be re-labeled, so the accumulation start date is the date the container reached its specified volume in the satellite storage area (the second date indicated on the container or label).
- h. All containers holding hazardous waste must be in good condition and not leaking, with no excess rust or damage that would potentially compromise the containers’ integrity.
- i. All containers shall remain **closed**, except when waste is being added or removed and have secure fitting caps, lids, bungs or rings to avoid spillage if the container was tipped over.
- Screw in type funnels may be used in place of caps or bungs if the funnel is equipped with a one-way check valve.

- j. To avoid any physical or chemical reactions the container used to accumulate waste must be compatible with the waste that it will be containing.

3.5 Hazardous Waste Coordinator Training

- a. Coordinators and Handlers: All personnel that handle or manage hazardous waste are required to successfully complete either formal classroom training or a *supervised* on-the-job training program, ([Appendix 4](#)) coordinated and overseen by qualified hazardous waste personnel within 6 months of being assigned their tasks or assignments. This is to be followed by an annual refresher program.
- b. Business Plan: Documented training for Hazardous Materials Business Plans is required for any newly assigned personnel and reviewed by all shop personnel annually. This review is to update personnel on emergency procedures, spill response and notification requirements, along with any waste or material storage locations that may have changed and information on materials that are used in the shop area. The CNRSW also submits an annual certification to the CUPA on all Business Plans within their area of responsibility.
- c. Shop Specific: Along with the coordinator / handler training, personnel that handle or manage hazardous waste shall have shop specific training, outlining any specific waste-streams processes, permit requirements, record keeping, or other hazardous waste issues.
- d. [Designation Letters](#): Environmental coordinators and waste handlers are required to have designation letters outlining their job title for their position. This includes a written job description for their duties and responsibilities in managing hazardous waste at their location. The designation letter is prepared by the individual's supervisor or chain of command. [Appendix 1](#) is an example designation letter provided by CNRSW Environmental staff.

3.6 Record Keeping Requirements

The following information must be available for review and maintained at the generator location for a minimum of **3 years**.

- a. Disposal Receipts: Waste turn-in forms, copies from manifests, bills of lading, receipts from recycled oils or other substances, Safety Kleen change outs, [lead acid battery](#) turn-ins or other items turned in or disposed of as a hazardous waste, universal waste or excluded recyclable material. CNRSW policy on when manifest error correction letters are to be prepared is provided in [Appendix 8-B](#). This policy also gives specific instructions regarding generator mailing addresses.
 - Waste Analysis: Lab analysis, waste profile sheets, test results or other documentation regarding the waste sent for treatment, storage or disposal.
 - Training Records: Current and previous personnel (from the date they departed) who handle or manage waste must have copies of their environmental training

records, letters of designation, job descriptions, diplomas, training certificates or any other environmental training documents.

- Inspections: Daily inspection records for hazardous waste storage tanks and ancillary piping.
- Hazardous waste accumulation area inspection records shall be maintained at the generator location for *1 year*.

3.7 Permits & Hazardous Material Business Plans

- a. Permits: A copy of the CUPA “Unified Facility Permit” or other type of permit issued by an authorized agency shall be current, readily available and posted in a conspicuous location.
- b. Business Plans: [Hazardous Material Business Plans](#) are required at any location that generates hazardous waste or stores hazardous materials at any time through the year in quantities greater than or equal to 500 pounds of solid, 55 gallons of liquid or 200 cubic feet of compressed gas. Business Plans identify material and/or waste storage locations, emergency points of contact, emergency and safety procedures, site maps and other information to assist emergency personnel in the event of a spill or release. A copy of the Hazardous Material Business Plan must be maintained at the generator location and must be updated within 30 days whenever there is a change to:
 - The emergency contact person or phone numbers.
 - A significant increase or decrease (50%) in the amount of hazardous material or waste that is used or stored.
 - The physical relocation of waste or material storage areas.
 - Installation of waste or material storage tanks
 - Any other pertinent information relating to hazardous waste or materials management.
- c. Documented training must be conducted annually or whenever newly assigned personnel arrive at the shop, work center, or generator location.
- d. After initial submittal, annual certification is required regardless of changes. A certification form is sent to the CUPA by the installation Environmental Office for all Business Plans under their area of responsibility.

3.8 Hazardous Waste Treatment

- a. Treatment is defined as any method, process or technique that is designed to change the physical or chemical composition, remove or reduce the toxic or hazardous effects, properties or characteristics of a hazardous waste.
- b. Hazardous waste may be treated at the generator location in lieu of or in conjunction with disposal. Environmental regulations require generators that treat hazardous wastes at their location to apply for permits that relate to the type, the amount, and toxicity of the waste being treated.
- c. Treatment permits are categorized in a process known as Tiered Permitting. Each tier has a very specific permit application, specific requirements, notifications, record keeping requirements, and operating procedures, in addition to those of hazardous waste generators. Refer all questions and provide notification prior to conducting any new treatment process to the installation Environmental Office for additional information regarding hazardous waste treatment and permitting requirements.

3.9 Hazardous Waste Recycling

- a. 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.
- b. ERM are subject to all regulations that apply to hazardous waste generators, including **90-day** storage limits, and shall not be excluded from the classification as a waste and be used or reused as specified below.
 - The material is used or re-used in an industrial process to make a product not being reclaimed, or is used or reused as a safe and effective substitute for commercial products if the material is not being reclaimed or returned to the original process from which the material was generated, without first being reclaimed.
 - The material is recycled and used at the same facility that generated the material.
 - The material is recycled within the accumulation time of 90 days from when the material was first generated.
 - The tank or container used to accumulate the recyclable material shall be labeled, and marked in accordance with the applicable hazardous waste generator requirements. Except that the container or tank must be labeled or clearly marked with the words “**Excluded Recyclable Material**” instead of “Hazardous Waste”. A sample Excluded Recyclable Material label is provided in [Appendix 9-B](#).

- c. Generators that recycle more than 100 kilograms per month (35 gallons) of recyclable material shall every two years provide in writing the following information to the local authorizing agency on a official agency form. This does not apply to generators who recycle anti-freeze or solvents since CNRSW requested and the CUPA agreed to this exemption.
- The name, site address, mailing address, and telephone number of the owner or operator of any facility that recycles the generator's material.
 - The name and address of the generator of the recyclable material.
- d. Regardless of paragraphs (a) or (b) all of the following recyclable materials are hazardous waste and subject to full hazardous waste regulations even if the recycling involves use, reuse or return to the original process.
- Materials used in a manner constituting disposal or used to produce products that are applied to the land including, but not limited to fertilizers, herbicides, soil amendments or agricultural minerals.
 - Used or spent etchants, stripping or plating solutions that are transported to an offsite facility operated by a person other than the generator.
 - Used oil - (See Guidance for [Used Oil Management](#))
 - Materials accumulated speculatively – Means a material or waste that is accumulated with the intent of recycling, however less than 75% of the waste onsite at the beginning of the calendar year is actually recycled by the end of the calendar year.
- e. Any person who manages hazardous waste as a recyclable material shall maintain adequate records to demonstrate that there is a known market or disposition for the material and that any exemptions or exclusions are met.
- f. Refer all questions and provide notification prior to conducting any new recycling processes to the installation Environmental Office for additional information regarding hazardous waste recycling and reporting requirements. A biennial report must be submitted to the CUPA for the ERM.

3.10 Hazardous Waste Turn-in Procedures

- a. This subsection outlines the requirements for CNRSW commands regarding the turn-in ([disposal](#)) of hazardous waste regardless if the turn-in is to NAVFAC-SW contractor hazardous waste operations or a private hazardous waste transporter.
- b. The contractor is required to adhere to an existing pickup schedule and coordinate non-routine pickups based on customer requests. To schedule a hazardous waste pick-up, contact the NAVFAC-SW hazardous waste facility at your installation. **Refer to [Appendix 6](#)**

for the current list of service locations and phone numbers. Ensure all hazardous waste containers are properly labeled, and the containers are not leaking. For items such as closed and sealed cans, aerosol cans or non-saturated rags, plastic bags or boxes may be used in lieu of drums. However, all non-identical waste must have individual labels or markings.

- c. Submit supporting documentation that identifies the type and concentration of the waste that is being disposed. This documentation is normally a waste profile sheet used in conjunction with a MSDS for known or non-mixed waste. Laboratory analyses may also be required for unknown wastes or consolidated known waste-streams. The environmental laboratory located at North Island, Building M-9, can be reached at (619) 545-8431.
- d. All hazardous waste going out on the EPA identification numbers owned by CNRSW shall have only authorized personnel sign the hazardous waste manifests, see [Appendix 8-C](#). The NAVFAC-SW operations staff and CNRSW staff who have completed and maintained the required DOT training may sign manifests. Additionally, ensure that a copy of the manifest is maintained at the generator location for three years and the original copies are submitted to NAVFAC-SW contractors' hazardous waste operations for proper management and tracking.

3.11 Hazardous Waste Generation Categories

There are three categories of hazardous waste generation for accountability which are described below and described in further detail in the “[Policy on Hazardous Waste Generated by Contractors](#)”, [Appendix 7](#). Determining the category of hazardous waste generation must be resolved before pursuing any disposal option.

- a. **Government Generated Hazardous Waste:** Hazardous waste generated solely by the physical actions of military forces or Federal government employees shall only bear a generator EPA identification number issued to the installation where the waste was generated. Contractors removing such waste must obtain concurrence with the hazardous waste profile as Government generated, before completion of the manifest. The manifest shall be presented to the NAVFAC-SW service provider contractor for review and upon approval, the service provider shall sign the manifest, representing the installation as the generator of the hazardous waste. For more information on “[Hazardous Waste Manifesting Procedures for Contractors](#)”, see [Appendix 8-A](#).
- b. **Contractor-Generated Hazardous Waste:** Hazardous waste generated solely by the physical actions of contractors that is not identified under the contract terms *shall not* be turned-in to the government hazardous waste facilities. Examples of these wastes are excess hazardous substances purchased by the contractor for a job, and wastes generated by a contractor working on non-government buildings or equipment (i.e. contractors servicing their own or leased vehicles, emergency diesel generators, painting contractor-owned or leased equipment, etc.). In these cases, the contractors will need to obtain either a permanent or a temporary EPA identification number that belongs only to the contractor. Pursuant to 6.5 HSC 25163.3, some contractors may be eligible to take the waste offsite and consolidate it at their other facilities.

- c. **Co-Generated Hazardous Waste:** Hazardous waste generated by contractors working on government owned property, such as buildings, equipment and vessels, may be turned-in to the government hazardous waste facilities under specific conditions. Examples of hazardous waste that are acceptable at these facilities include building demolition, asbestos abatement, lead abatement, contaminated soil removal, spent sandblast grit, paint chip debris, oil/lubricants and hazardous substances found when cleaning-out government spaces. Under these circumstances, the installation EPA identification number would be used and the contractor would receive a “waste turn-in form” for billing, tracking and data collection purposes. Prior to being provided with a government hazardous waste facility pickup (or delivery for industrial and oily wastes) appointment, the contractor must establish funding for the services and provide a waste profile. Regardless of whether the contractor uses the government hazardous waste facilities or private hazardous waste hauler and disposal facility, the government service provider shall sign the manifest, representing the installation as the waste generator. For more detailed information, see [Appendix 7](#). For more information on manifesting for contractors, see [Appendix 8-A](#).

SECTION 4 - UNIVERSAL WASTE MANAGEMENT

4.1 Overview

- a. 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.
- b. Currently in California, universal wastes are comprised of the following classifications of used, spent, or discarded.
 - **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.
 - **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.
 - **LED Bulbs**: All Light emitting diode (LED) bulbs, broken or intact, are included due to their potential lead and arsenic content. If a LED bulb is broken, any other material generated (e.g. cleanup supplies) would be identified as hazardous waste.
 - **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.
 - **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.
 - **Consumer Electronic Devices**: Anything with a printed circuit board.
 - **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.

4.2 Management & Storage

- a. 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.
- b. 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.
- c. All universal wastes shall be segregated and stored under the requirements for hazardous waste management, and not be accumulation for longer than **6 months** at the generator location.
- d. Broken lamps, tubes, thermometer or other universal wastes items shall be containerized and managed under hazardous waste requirements of [Section 3.4](#) except for broken LED bulbs.

4.3 Labeling & Marking

- a. Each universal waste item that is not in a container and/or each container shall be labeled. 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").
- b. Each label shall also have the accumulation start date placed on it, identifying the date that the waste became a Universal Waste.
- c. Hazardous waste labels shall **not** be used when labeling universal wastes for transportation or disposal.

4.4 Transportation & 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 requirement for hazardous materials by using a bill of lading 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:
 - Name & address of generator.

- Quantity and type of each universal waste shipped.
- Date of shipment from the facility.

SECTION 5 - EMERGENCY AND NON-EMERGENCY PROCEDURES

5.1 Purpose

To inform CNRSW personnel on the process in which hazardous materials or waste spills are handled and reported. Upon discovery of *any* spill or release either in or outside the work area, which meets or exceeds the below criteria, follow the procedures outlined in Section 5.2. The command that has responsibility for the area where the spill or release occurred or was discovered shall coordinate all initial notifications.

- Any spilled substance that is greater than 5 gallons in total volume.
- Spilled substance(s) that enters a storm drain, sewer system or body of water (bay).
- The spill is not easily controlled or contained.
- Spills that threaten human health, safety, or the environment.

5.2 Emergency Notification Procedures

- a. BE SAFE. If you do not know what the spill is, STAY AWAY and simply notify the emergency responders. Do NOT try to rescue any downed personnel.
- b. Notify: Federal Fire at **9-911** or Central Dispatch at (619) 524-2001 and notify the installation Environmental Office (Refer to [Appendix 6](#)), and installation Safety Office. Provide the required information as outlined in [Internal Spill Report Form, Appendix 5](#).
- c. Secure: Limit the access of personnel to where the spill or release has occurred. Use barrier tape from the spill kit, warning cones or other warning items or signs to restrict access to the surrounding area.
- d. Identify: Find out what type substance was spilled or released and if possible obtain an MSDS, lab analysis or other information pertaining to that substance.
- e. Isolate: If safe, prevent the spill from spreading, cover or dike any nearby floor, storm, or sewer drains.
- f. Follow all the specified response, notification or evacuation requirements outlined within your shops [Hazardous Materials Business Plan](#).

5.3 Emergency Spill Equipment

All shops that generate or accumulate hazardous waste shall maintain the following emergency equipment and inspect these every thirty days:

- a. Spill Control: Spill kits containing [absorbent materials](#) (socks, pads, absorbent clay aka: kitty litter) must be located near the storage/work areas to clean up and control leaking or spilled substances or wastes.

- b. Communication Devices: Telephone, two-way radio, alarms must be located at or near the waste storage area to notify emergency response personnel (fire, security) in case of a spill, release or injury.
- c. Fire Fighting: Portable fire extinguishers or other fire suppression equipment designed to extinguish the specific waste or material being stored must be available at or near the storage area.
- d. Decontamination: Eyewash and or shower stations (required for all corrosives being handled) shall be located at or near the storage location or operating process.
- e. Equipment Maintenance: Ensure that all communication, fire fighting, and other emergency equipment is regularly inspected, tested and maintained in proper operating condition.

5.4 Non-Emergency Notifications

All hazardous substance spills that occur outside of the work area, on roadways, common areas or building must be reported as soon as practical to the installation Environmental Office, regardless of whether the spill meets or exceeds the thresholds specified in [Section 5.1](#).

5.5 Abandoned & Discarded Hazardous Substances

The following procedures are for CNRSW personnel who discover abandoned or discarded hazardous waste, medical waste or hazardous materials at unauthorized locations, common areas, outlying Navy property (housing areas) or that has been inadvertently placed into solid waste (trash) containers or dumpsters. In addition, this section identifies the steps necessary for the proper reporting, recovery, transportation and disposal of these wastes or materials.

5.6 Notification Procedures

- a. In the event of the discovery of abandoned or discarded hazardous substance the discovering person shall notify 9-911 and report the incident *only* if the abandoned substance poses an immediate threat to human safety or is being released into the environment
- b. If the discovered substance poses no immediate danger as indicated above, then notify the installation Environmental Office as soon as possible.
- c. If the abandoned item is a compressed gas cylinder and located on a pier contact Port Operations.

5.7 Transportation & Disposal

- a. A licensed and fully trained hazardous waste hauler shall be the only entity authorized to transport Navy owned abandoned, discarded or recovered hazardous waste or materials from off-site locations.
- b. All recovered abandoned or discarded hazardous waste, medical wastes or hazardous materials, along with all corresponding documentation (manifests, if applicable), shall be transported to a Navy owned, RCRA Part B-permitted, hazardous waste storage facility (TSDF), authorized to receive offsite hazardous waste.
- c. All abandoned or discarded wastes or materials that have been recovered shall be managed and disposed of as **hazardous waste** even if the material could be deemed “usable” or recycled.
- d. Any recovered medical wastes shall be held at the permitted, waste storage facility until arrangements can be made for transportation and disposal to an authorized medical waste disposal facility.

NOTE: If CNRSW personnel are notified by a regulatory or other official agency that hazardous waste or materials from their organization have been recovered from a landfill or other location, immediately notify the installation Environmental Office.

SECTION 6 - HAZARDOUS WASTE MINIMIZATION

6.1 Purpose

The Hazardous Waste Source Reduction and Management Review Act, requires generators of hazardous waste to reduce the waste they generate. Additionally, the Pollution Prevention 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.

6.2 Implementation

Pollution reduction and prevention can be accomplished by specific process review or operational improvement measures commonly known as Source Reduction. Outlined below are specific waste minimization measures that may be implemented to reduce the amount of hazardous waste generated and to reduce the overall waste disposal cost.

- a. Operational Controls: Command personnel should minimize the use of hazardous materials or use less hazardous products or substances whenever possible, and incorporate operational improvements, chemical/material substitution or process modifications, thus potentially reducing or eliminating the generation of hazardous waste at the source or at the initial point of generation. Substitution of raw materials or chemicals may offer the greatest opportunity for waste reduction. Replace materials that generate large amounts of hazardous waste with materials that produces little or no waste.
- b. Administrative Controls: Implementing best management practices or centrally managed material inventory controls can reduce the amount of expired, excess or retrograde materials from being disposed of as a hazardous waste. Procedural changes can be implemented in many areas of the operational process such as chemical change-out timeframes. Since these procedures only affect the operating parameters they can be implemented at no or low cost to the activity. Additionally, implementing a strict and thorough maintenance program that stresses corrective and preventive maintenance will reduce the risk of releasing hazardous materials due to equipment break down or failure.
- c. Recycling/Re-use: Numerous types of hazardous waste (e.g. oils, solvents) may be re-used or recycled at the process, command hazardous waste site, or by a contractor at an offsite location. Metal or plastic [containers](#) less than 5 gallons in capacity, holding hazardous material may also be recycled as scrap, pending *ALL* the material or residue has been removed. Solvents could be re-used in cleaning or degreasing process, which may only require surface preparation prior to another cleaning or stripping process. Review [Section 3.9](#) for the specific requirements regarding hazardous waste recycling.

- d. [Treatment](#): Treating wastes can be effectively used to reduce the volume of hazardous waste generated and waste disposal cost by converting the waste to a non-hazardous or less toxic state. However, hazardous waste treatment requires permitting and specialized treatment units, which could potentially offset any saving in waste disposal cost. For additional information on hazardous waste treatment refer to [Section 3.8](#).
- e. Training: Educating command personnel on basic material handling practices can result in immediate and direct reductions of waste generation and cost savings. This can involve taking steps as basic as complying with existing hazardous material or waste management regulations, the operational capacity and capabilities of different types of equipment (presses, conveyers, forklifts, etc.) to prevent spills or overfills during maintenance, to keeping containers closed to prevent the deterioration or spillage of the material.

SECTION 7 - CONTRACTOR RESPONSIBILITIES

7.1 Contractor Generated Wastes

- a. The Government will not provide any support, containers, technical assistance, equipment, or storage at a Government facility for contractor-generated HW. All contractors conducting operations or processes located at CNRSW that produce “**contractor generated**” hazardous waste shall, label, segregate, accumulate, containerize, dispose and overall manage their waste as “the generator of the hazardous waste” in accordance with all Federal, state and local environmental laws or regulations including but not limited to the following.
- Hazardous waste shall be placed into Department of Transportation (DOT) shipping containers.
 - All wastes shall be compatible with the containers used to store the waste.
 - Inspect container storage area weekly, checking for open or leaking containers, missing labels, and or deterioration of containers or containment system.
 - Ignitable and/ or reactive waste must be stored at least 50 feet from the base property line or from the closest inhabitable building.
 - All containers shall be kept closed during storage except when adding or removing contents.
 - All waste/material must be compatible if they are mixed or consolidated.
 - All containers must have a clearly and properly filled out label with the accumulation start date.
 - All waste must be properly disposed within 90 days from the initial accumulation start date.
 - Hazardous waste/material **shall not** be placed or disposed in dumpsters or other solid waste (trash) containers.
 - All hazardous waste/material spill or releases regardless of quantity must immediately be reported to the Federal Fire Department at **9-911**. Cost of the clean-up and disposal of the spilled or released material shall be the sole responsibility of the contractor.
- b. Contractor hazardous waste may not use the government EPA identification number for purposes of waste disposal, and shall apply for a permanent or temporary EPA identification number specific to their operations. Contractors working on Naval vessels

shall not name the vessel but are directed to provide the installation name and pier where the vessel is berthed for purposes of providing the generating site information. Reference [Appendix 11](#) for the CNRSW policy on this topic. Under no circumstances shall contractors applying for EPA identification numbers identify the government as owner of the number.

- c. Contractors/subcontractors shall negotiate with the Certified Unified Program Agency (CUPA) directly to determine whether the CUPA requires a permit for their activities involving hazardous materials, hazardous waste, medical waste, and underground storage tanks. Having a CUPA permit is not dependent upon the contractors/subcontractors having an individual EPA I.D. number. [Appendix 12](#) provides guidance to contractors/subcontractors pertaining to CUPA permits for contractor/subcontractor work in the Metro San Diego area.
- d. Contracting officers or their representatives shall obtain a copy of the EPA ID number application submitted to DTSC by the generating contractor. It is their responsibility to confirm that the Navy is NOT listed as the generator of the waste. For any application found to list the Navy as the generator, the contracting officer shall immediately contact the contractor to remove the Navy as the generator and get the application corrected to list the contractor as the generator.

7.2 Co-Generated and Government-Generated Hazardous Wastes

- a. CNRSW commands using contractors that generate navy owned hazardous waste shall be responsible for the proper management of their waste in accordance with the provisions of the CNRSW Hazardous Waste Management Plan. For HW that the contracting officer has provided an e-mail stating that the HW is to be designated Government generated or Co-generated waste, the waste may be disposed of using the installation EPA identification number and the manifests must be signed by the CNRSW environmental services provider.
- b. The contractor is required to characterize the waste, which includes any analytical testing necessary to develop a waste profile to be used for disposal. Containers are not provided to any contractor unless the HW is being turned in to the government hazardous waste facilities. The contractor must establish a Job Order Number (JON) for any environmental services. The contractor must contact the NAVFAC-SW staff (see [Appendix 6](#)) to set up this line of accounting prior to any services provided.
- c. Additional fees for waste disposal may need to be secured for waste disposal payment to the California Board of Equalization. These fees are paid twice each year in various amount based on the volume of waste manifested for disposal. Refer to [Appendix 10](#), CNRSW Policy Letter for additional information.

NOTE: Contractors should refer all questions or comments regarding this section to their respective Contract Office or NAVFAC-SW environmental point of contact. Refer to [Appendix 6](#) for a list of contacts.