

APPENDIX D

VISITING CONTRACTOR HW MANAGEMENT SOP

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Acronyms and Abbreviations

ASD.....	Accumulation Start Date
AUL	Authorized User List
BMP	Best Management Practice
CE	Conditionally Exempt
CFR	Code of Federal Regulations
CO	Commanding Officer
DDA	Designated Disposition Authority
DDESB	Department of Defense Explosives Safety Board
DEA	Drug Enforcement Administration
DLA	Defense Logistics Agency
DoD.....	Department of Defense
DOT	Department of Transportation
EC	Emergency Coordinator
EHM.....	Excess Hazardous Material
EHW	Explosive Hazardous Waste
EMS	Environmental Management System
EOD	Explosive Ordnance Disposal
EPA.....	United States Environmental Protection Agency
EPCRA.....	Emergency Planning and Community Right-to-Know Act
ESO	Explosive Safety Officer
FEAD	Facilities Engineering, Acquisition, and Design
HM.....	Hazardous Material
HPW	Hazardous Pharmaceutical Waste
HW	Hazardous Waste

HWC	Hazardous Waste Coordinator
HWMP	Hazardous Waste Management Plan
HWPM	Hazardous Waste Program Manager
IC	Incident Commander
IEPD	Installation Environmental Program Director
ISSA	Interservice Support Agreement
MDAS	Material Documented as Safe
MDEQ	Mississippi Department of Environmental Quality
MM	Military Munitions
MMR	Military Munitions Rule
MRIP	Munitions Rule Implementation Policy
MPPEH	Material Potentially Presenting an Explosive Hazard
NAVFAC SE	Naval Facilities Engineering Command Southeast
NAVHOSP	Naval Hospital
NCBC	Naval Construction Battalion Center
NCF	Naval Construction Force
NCG	Naval Construction Group
OPNAVINST	Chief of Naval Operations Instruction
OSHA	Occupation Health and Safety Administration
PMRP	Precious Metals Recovery Program
POP	Performance Oriented Packaging
PPE	Personal Protective Equipment
PWD	Public Works Department
RCRA	Resource Conservation and Recovery Act
SAA	Satellite Accumulation Area

SDS *Safety Data Sheet*

SOP *Standard Operation Procedure*

SW *Solid Waste*

TCLP *Toxicity Characteristic Leaching Procedure*

TSDF *Transfer, Storage, and Disposal Facility*

UW *Universal Waste*

WMM *Waste Military Munitions*

WSD *Waste Stream Determination*

INTRODUCTION

Naval Construction Battalion Center (NCBC) Gulfport, Mississippi is a large quantity generator of hazardous waste (HW) and operates a Less-Than-90-Day Storage Facility for the storage of HW. The management of wastes at NCBC Gulfport is the responsibility of the Public Works Department (PWD) Environmental Division who are aligned as part of Naval Facilities Engineering Command Southeast (NAVFAC SE). The Installation Environmental Program Director assigns the HW Manager, who is responsible for HW management at NCBC Gulfport.

D.1 Purpose

The purpose of this Standard Operating Procedure (SOP) is to establish authorities, policies, and responsibilities of visiting contractors who may generate hazardous waste (HW) and/or non-HW when performing construction activities on board Naval Construction Battalion Center (NCBC) Gulfport. For purposes of this SOP, contractors are considered either permanent or visiting. Permanent contractors are those who are Department of Defense (DoD) contractors, working for one of NCBC Gulfport's Tenant Command and who are conducting work that is considered "mission-related". Visiting contractors are those who are brought onto NCBC Gulfport through the Naval Facilities Engineering Command Southeast (NAVFAC SE) Public Works Department (PWD) Facilities Engineering, Acquisition, and Design (FEAD) Division to conduct facility-type work that is considered to be construction, repair, or maintenance. This SOP applies specifically to those FEAD contractors but also applies to any visiting contractor on NCBC Gulfport to conduct similar work by other Tenants.

D.1.1 Overview

The NAVFAC SE PWD Contracting Officer is responsible for the administration of contracts awarded through the FEAD. Communications between government and contractor personnel shall be arranged and coordinated through the Contracting Officer.

NCBC Gulfport is considered as a Large Quantity Generator (LQG) of HW and, as such, is subject to **all** of the requirements contained within 40 Code of Federal Regulations (CFR) Part 264. The NCBC Gulfport Commanding Officer (CO), as the facility owner and operator, is considered as the "Generator" of hazardous and non-HW produced within NCBC Gulfport's fence line and has sole responsibility for maintaining regulatory compliance at NCBC Gulfport.

On behalf of the CO, the NCBC Gulfport Hazardous Waste Program Manager (HWPM) acts as the oversight authority for environmental compliance, responsible for ensuring that personnel are made aware of, and comply with, **all** of the associated environmental laws, rules, regulations, DoD Directives, and Navy policies. The NCBC Gulfport HWPM interprets these requirements and is responsible for providing personnel with the guidance regarding procedures and instructions necessary to maintain environmental compliance.

The NCBC Gulfport HWPM manages the HW Program for NCBC Gulfport. This individual represents the CO on hazardous and non-HW issues and is responsible for ensuring that compliance with hazardous waste regulations are maintained throughout the facility.

D.2 Definitions

A list of definitions is provided for convenience, but refer to the definitions found in the hazardous waste regulations found in 40 CFR 260-268.

Accumulation Start Date:

a. Accumulation Start Date at Less-Than-90-Day Storage Facility:

1. The accumulation start date is the date the first drop or item is placed into a HW container at the Less-Than-90-Day Storage Facility, or
2. The date that a satellite accumulation area (SAA) transfers a container to a Less-Than-90-Day Storage Facility or a permitted HW storage facility.

b. Accumulation Start Date at a SAA:

1. The date that the total amount of HW exceeds the 55-gallon limit, or
2. The date that a HW container is transferred from the SAA.

c. Accumulation Start Date for Universal Waste:

1. The date the container first receives waste.

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 an “authorized representative” to act on their behalf.

Best Management Practices (BMPs): Describes 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.

Characterization: The process of identifying waste constituents, their concentrations, and the work process generating the waste. Characterization ensures waste is properly handled, treated, and disposed. Characterization is required to identify the EPA waste codes, the underlying hazardous constituents, and the DOT proper shipping name.

Commercial HW Management Facility: Any HW management facility that accepts HW or polychlorinated biphenyls for a charge.

Container: Any portable device in which a material is stored, transported, treated, or disposed.

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

Contaminated Medium/Media: 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 HM or waste.

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

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, personnel protection equipment (PPE), large and small equipment, etc.

Dilution: The deliberate mixing of HW with another material for the purpose of changing either the characteristic(s) or the concentration of a constituent in the waste. Dilution of a HW is prohibited.

Disposal: The process of treating a HW to render it non-hazardous or the placing of a HW into a landfill that is a permitted HW Transfer, Storage, and Disposal Facility (TSDF).

Empty Container: Any HM or HW container, except a compressed gas cylinder, aerosol can, or an acute HW container, that has had wastes removed by using 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 (1 inch) of residue remain 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.
- c. A compressed gas cylinder is empty when the pressure inside the container approaches atmospheric.
- d. A container with an inner liner shall have the liner removed.

EPA HW Codes: The specific alphanumeric sequence assigned by the EPA to specify type and characteristic of a HW.

Free Liquids: The liquid component of a waste.

Generator: Any person by site whose act first causes a waste to be subject to regulations.

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

HM: Any material that because of its quality, concentration, physical, chemical, or infectious characteristics, may pose a substantial hazard to human health or the environment when incorrectly used, purposefully released, or accidentally spilled.

HW: Before a waste can be a HW, it must first meet the definition of a solid waste (SW). A SW is a HW if it is a chemical listed in 40 CFR 261, if a chemical listed in 40 CFR 261 is the sole active ingredient of a commercial product, or if a SW exhibits one or more of the HW characteristics listed below:

a. Ignitable:

1. a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, that has a flash point less than 140 degrees F;
2. a non-liquid capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture or spontaneous chemical changes, **and** when ignited burns so vigorously and persistently that it creates a hazard;
3. an ignitable compressed gas; or
4. an oxidizer.

b. Corrosive:

1. an aqueous (water) solution that has a pH equal to or less than 2.0 or equal to or greater than 12.5; or
2. a non-aqueous liquid capable of corroding steel at a rate greater than 0.25 inch per year.

d. Reactive:

1. is normally unstable and readily undergoes violent change without detonating;
2. reacts violently with water;
3. forms potentially explosive mixtures with water;
4. when mixed with water, it generates toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment;
5. is a cyanide or sulfide-bearing material that, when exposed to pH conditions between 2.0 and 12.5, it can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment;

6. is capable of detonation or explosive reaction if it is subjected to a strong ignition source or is heated under confinement;
 7. is readily capable of explosive detonation or reaction at standard temperature and pressure;
or
 8. Is a forbidden explosive or a Class A or Class B explosive as defined in 49 CFR 173.51, 173.53, or 173.88, respectively.
- e. Toxic : that a representative sample, using the toxicity characteristic leaching procedure (TCLP), leaches one or more hazardous constituents at a concentration equal to or greater than the concentration listed in 40 CFR 261.24.

HW Constituent: The chemical that causes the waste to be regulated.

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 container from the material stored in it.

Lamps (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.

Leachate: The liquid, including any suspended components in the liquid, which has percolated through or drained from a waste.

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.

Manifest Tracking Number: The alphanumeric identification number pre-printed in Item 4 of the manifest by a registered source.

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

Military Munitions (MM): Ammunition and their components produced or used by or for the DoD or the United States Armed Services for national defense and security including military munitions controlled by the DoD, the United States Coast Guard, the United States Department of Energy, and the National Guard.

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.

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

Profile Number: The unique, optional, alphanumeric identification number used to designate a specific waste stream.

Profile Form: The Defense Reutilization and Marketing Service Form DD-1930 or other forms that are used to document specific disposal information for each waste stream sent to the TSDF.

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

Sludge: Any solid, semisolid, or liquid waste generated by a wastewater treatment plant, water supply plant, or air pollution control facility. This does not include the treated effluent from a wastewater treatment plant.

Soil: Unconsolidated earth material composing the superficial geologic strata, consisting of clay, silt, sand, or gravel size particles, or a mixture of such materials with liquids, solids, and sludges.

Solid Waste: 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.

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

Thermostat: A temperature control device that contains metallic mercury.

TCLP: The analytical procedure used to determine if a solid waste leaches contaminants into the environment

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

Transporter: A person engaged in the offsite transportation of HM/HW.

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.

Underlying Hazardous Constituent: Any constituent listed in §268.48 that can reasonably be expected to be present at the point of generation of a characteristic HW at a concentration exceeding the constituent-specific Universal Treatment Standards.

UW: Batteries, fluorescent lamps, some pesticides, and mercury-containing equipment formally classified as a HW, but that are now subject to less stringent regulations, when recycled if recycling is available.

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

Wastewaters: Waste that contain less than 1% by weight total organic carbon and less than 1% by weight total suspended solids.

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

D.3 Applicable Regulations

The procedures and requirements set forth in this HWMP are mandatory; therefore, they are not discretionary. There is a potential for fines and criminal liability for persons violating HW regulations.

- a. 40 Code of Federal Regulations (CFR) 260-268, 270, 273. The federal (EPA) regulations that establish a “cradle-to-grave” approach for managing, storing, and disposing of HW including waste characterization, the manifest system, the generator standards, the treatment standards, and the disposal requirements. These regulations also include the requirements for recycling materials, including burning material for its energy value as well as precious metal recovery.
- b. 40 CFR 279. The EPA regulation for the management of used oil and used oil filters including reporting, storage, disposal, recycling for energy value and other related requirements.

- c. 40 CFR 266.200. The EPA regulation, Waste Military Munitions (WMM) Rule, which exempts WMM from the RCRA regulations, including the storage and manifest requirements when the WMM are managed per the conditions specified in this regulation.
- d. 49 CFR 171-180. The Department of Transportation (DOT) regulations for the shipment of hazardous material (HM) and HW across public highways. The 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 and specific closure requirements for those containers.
- e. 49 CFR 390-397. The DOT regulations that govern the qualifications of the drivers, the equipment in the vehicle, and in some cases, routing of HM or HW shipments must take during transport.
- f. 40 CFR 112. The EPA regulation governing spill containment for petroleum storage tanks and spill reporting.
- g. 40 CFR 116-117. The EPA regulations governing when and how a release or spill of a chemical in quantities exceeding the reportable quantity must be reported to the National Response Center.
- h. 11 Mississippi Administrative Code Part 3, Chapters 1, 2, and 3. The State of Mississippi's regulations governing HW.

D.4 Authorities

The Resource Conservation and Recovery Act (RCRA) authorized the United States Environmental Protection Agency (EPA) to implement regulations for the management of HW from the point of generation through final disposal. The United States Congress waived sovereign immunity for DoD facilities subjecting them to full regulation including assessment of fines and penalties. The EPA granted the State of Mississippi the authority to implement and enforce HW regulations including the identification, packaging, labeling, storing, transporting, and the treatment standards for proper disposal of regulated waste.

The Chief of OPNAVINST 5090.1 series requires shore installations to develop a HWMP in accordance with applicable federal, state, and local regulations.

This SOP is not a replacement for the regulations. Rather, it is a reference that provides the assigned waste management coordinator or project environmental manager/supervisor with a basic instruction and overview of the expectations and responsibilities when generating hazardous and non-hazardous waste which may result from the implementation of construction projects conducted on NCBC Gulfport.

This SOP is not intended to be used as a substitute for the training requirements outlined in

40 CFR 264.16. However, the information contained within this SOP can be referenced and used in developing such a program. To ensure that wastes generated as part of a construction project are being managed in a safe and compliant manner, it is strongly encouraged that contractor employees assigned to a project become familiar with **all** of the Authorities listed above as well as this SOP. If have any questions regarding this SOP, contact the NCBC Gulfport HWPM (228-323-1654) or the HW Handler (228-323-9877).

D.5 Responsibilities

D.5.1 NCBC Gulfport Commanding Officer (CO)

The NCBC Gulfport CO, through the NAVFAC SE PWD FEAD, grants access to contractors working at NCBC Gulfport. Any contractor who improperly manages HW or fails to comply with this instruction may be denied access to the installation. Any inspector from NCBC Gulfport shall have immediate access to inspect contractor's work areas and shall report discrepancies to the NAVFAC SE PWD FEAD.

D.5.2 NAVFAC SE PWD FEAD

The NAVFAC SE PWD FEAD contracts for projects that focus on construction or maintenance of facilities at NCBC Gulfport. Each contract shall contain specifications requiring compliance with the NCBC Gulfport Environmental requirements.

In addition, each Project Manager shall perform the following:

- a. Ensure contractors comply with federal, state, and local regulations, in addition to Navy and NCBC Gulfport instructions;
- b. Provide the contractor's Environmental Protection Plan to the NCBC Gulfport NAVFAC SE PWD Environmental Division for review and concurrence;
- c. Provide this HWMP and SOP to all contractors;
- d. Notify NCBC Gulfport, **before HW is generated**, if a contractor expects to generate waste;
- e. Coordinate approval for contractor's HW storage location(s) with NCBC Gulfport HWPM;
- f. Notify the NCBC Gulfport Environmental Division if a contractor unexpectedly generates hazardous waste, is found to have violated Federal, State, or local environmental regulations, or causes a spill / release to the environment;
- g. Provide NCBC Gulfport HWPM access to HW records;
- h. Ensure that the contractor includes costs for the handling, management, and disposal of hazardous and non-HW as part of the overall cost of the project.

Certain contracts will require an Environmental Protection Plan to include the proper management of HW and Non-RCRA regulated wastes. The Environmental Protection Plan will perform the following:

- a. Identify an estimate of the type and amount of waste to be generated during the performance of the contract;
- b. Identify and ensure required documents are accurate and timely;
- c. Require that an EPA-approved and certified laboratory completes chemical analysis if necessary;
- d. Require EPA waste codes be properly identified;
- e. Require proper disposal of regulated waste such as petroleum products and/or wastewater;
- f. Require best management practices to minimize the amount of HW and other waste generated; and
- g. Require that disposal costs be included in the contract cost. **The Government shall not pay for the disposal of any waste that is generated by a visiting contractor.**

D.5.3 NCBC Gulfport HWPM

The NCBC Gulfport HWPM shall perform the following:

- a. Review scopes of work, contract specifications, requests for proposals, etc. to ensure that a project includes all aspects of HW management in accordance with this SOP;
- b. Review the contractor's Environmental Protection Plan to ensure that it follows the guidance provided in this SOP;
- c. Recommends the use of a SAA or 90-day accumulation area based on the size of the project and the estimated amount of HW that will be generated;
- d. Assist the contractor in the establishment of a SAA or 90-day accumulation area that will support the project
- e. Maintain organized records of required documentation including logs, inspections, and reports for a minimum of 3 years; and
- f. Ensure action is taken to either resolve a deficiency or notifies the appropriate department when potential safety violations are identified.

D.5.4 Contractor Hazardous Waste Coordinator (HWC)

Contractors shall designate, in writing, a primary and alternate HWC for all working shifts where it is anticipated that hazardous and non-hazardous waste will be generated. The Contractor HWC will perform the following:

- a. Provide liaison to the Contracting Officer and the NCBC Gulfport HWPM for all waste management issues;
- b. Be trained per Section D.6 of this Appendix; and
- c. Be the person(s) with the overall responsibility for maintaining compliance with HW regulations within the project area, including any SAAs or 90-day accumulation areas that may have been established to support the project. The Contractor's Project Manager/Site Supervisor/Site Superintendent assigned to this project is ultimately responsible for all work areas and should also be encouraged to participate in proper waste management training.

D.6 Training Requirements

At a minimum, personnel who may be assigned to handle HW must have completed the Occupation Safety and Health Administration (OSHA) 24-hour Hazardous Substance Incident Response Management Course and the 8-hour refresher training on an annual basis in accordance 29 CFR 1910.120. Also personnel must complete the 24-hour Introduction to Hazardous Waste Generation and Handling Course and the 8-hour RCRA Hazardous Waste Review annually. If such training has not been completed, the waste coordinator cannot perform those duties unless directly supervised by a person who has received such training. Training record(s) shall be kept in an accessible location and/or at the project office/trailer, and be made available during any state or EPA inspection.

In addition, Contractor HWCs should also be provided with, and satisfactorily complete, a NCBC Gulfport-approved waste management training program prior to handling and or managing waste at the worksite(s). Contact the NCBC Gulfport HWPM (228-323-1654) or the HW Handler (228-323-9877) to arrange for training.

D.7 HW Management

HW shall be managed in accordance with federal, state and local regulations in addition to Navy and NCBC Gulfport policies and instructions. Contact the NCBC Gulfport Environmental Office, with the FEAD Project Manager, regarding proper handling, storage and disposal procedures.

It is strictly prohibited to dispose of any waste into any wastewater treatment system, oily waste treatment system, storm drain, surface waters, or upon the land without written authorization from NCBC Gulfport.

D.7.1 Waste Stream Determination (WSD)

The Contractor will make arrangements with the NCBC Gulfport HWPM to review the WSD for waste. The NCBC Gulfport HWPM shall review Safety Data Sheets (SDS) and work processes that will be associated with the project to determine if any industrial wastes will be generated during the project. If it is determined that wastes will likely be generated during the

project, the contractor will provide documentation to NCBC Gulfport Environmental, who may also assist the contractor in completing the WSD properly. All WSDs at NCBC Gulfport will be approved by NCBC Gulfport Environmental.

The WSD(s) will provide the documentation required for waste disposal from NCBC Gulfport. The HW is being disposed using the NCBC Gulfport EPA Identification Number, and NCBC is ultimately responsible for the waste disposal.

Should a change occur that results in the use of different chemicals and/or processes than was originally described and reviewed, the Contractor will be required to inform the NCBC Gulfport HWPM of the change(s). These notifications are vital in assuring that wastes are being identified and managed properly.

D.7.2 Accumulation Area(s)

All HW accumulation areas at NCBC Gulfport must be requested, approved, assigned, and designated by NCBC Gulfport HWPM. The Contractor may set up SAAs or 90-day accumulation sites to temporarily accumulate waste that is generated as a result of a project. **Hazardous or non-HW generated from a construction project shall not be transported to, or managed by, the NCBC Gulfport Less-Than-90-Day Storage Facility (Building 276).**

Before establishing either type of accumulation area, the Contractor should first consult with NCBC Gulfport HWPM for guidance, assistance, and approval of the type of accumulation area and their location(s).

Signs shall be posted at the accumulation site. These signs are intended to designate the accumulation area and provide the reader with important information that includes, but is not limited to, the name and phone number of the HWC, the accumulation site number, and emergency response procedures in case of a spill. Sign information is to be current and legible.

D.7.3 Satellite Accumulation Areas (SAA)

The Contractor may initiate an SAA, which is an accumulation area at or near the point of generation, controlled by the operator generating the waste and where less than 55 gallons of HW or 1 quart of acute HW is accumulated at any one time. The 55-gallons limit (also known as the "55 Gallon Rule") includes all types of HW but does not include universal waste, non-RCRA regulated waste or Used Oil.

It is strictly prohibited to dispose of any waste into any wastewater treatment system, storm drain, surface waters, or upon the land without proper authorization from NCBC Gulfport Environmental.

An extensive effort shall be made to determine if a HM is usable before it may be disposed of as a waste. To minimize waste generation, utilize good inventory management e.g., use older material

first, check expiration dates, order only what is required, and purchase less toxic or non-HM when possible.

Based on the size of the project, it may necessary to establish more than one SAA within the project area. To avoid any situation that may jeopardize the NCBC Gulfport's compliance posture, the Contractor should first discuss this with the NCBC Gulfport HWPM for guidance and assistance.

D.7.4 90-Day Accumulation Site

A contractor may operate a 90-day accumulation site; however, the site may not be established without prior approval from NCBC Gulfport Environmental. Each approval is evaluated on a case-by-case basis. Approval must be gained before waste may be stored in it.

For a 90-day accumulation site, the "55 Gallon Rule" does not apply. More than 55-gallons of HW can be accumulated in this type of area. However, there is a time restriction associated with this type of area. That restriction being that the HW must be removed from this type of area within 90 days of when HW was first placed into the container. For projects where it is anticipated that there will be large quantities of HW generated, this type of accumulation area should be considered in order to reduce the number of times HW gets transported to the Transfer, Storage, and Disposal Facility (TSDF).

There is no requirement for this accumulation area to be located at or near the point of hazardous waste generation. More than one 90-day accumulation site may be set up based upon the size of the project.

Other requirements for the establishment of a 90-day accumulation site include the following:

- a. Weather-resistant signs stating "**NO SMOKING WITHIN 50 FEET**" on all exterior sides of the fenced area. Each sign shall be clearly visible from 50 feet;
- b. Weather resistant signs reading "**DANGER - UNAUTHORIZED PERSONNEL KEEP OUT**" and "**HAZARDOUS WASTE STORAGE AREA**" on each entrance. Each sign shall be clearly visible from 25 feet;
- c. Access control at all times by fencing the area and keeping it locked or locating the area within a secured building or trailer;
- d. Provide secondary containment for containers holding liquid waste (e.g., concrete curbs, spill pallets, etc.);
- e. Provide **fire extinguisher(s)**, **eyewash station(s)** and **internal communication** devices (telephone, two-way radio, etc.) or other communication system capable of summoning emergency assistance;

- f. Maintain sufficient aisle space around containers for unobstructed movement of personnel for fire protection, spill control and access to decontamination equipment;
- g. Maintain and make available a spill kit and emergency response equipment. The spill kit will be clearly marked and located in an accessible area. Contents of the spill kit will include:
 - 1. Material and equipment necessary to contain and clean up spills, (i.e., non-sparking shovel and dust pan);
 - 2. Absorbent material that is compatible with the waste stored in the 90-day accumulation site;
 - 3. Personal protective equipment including gloves, face shields, rubber boots, etc.; and
 - 4. Sufficient container(s) and label(s) to properly clean up a spill and the debris thereof.

D.7.5 Container Management Requirements

Containers shall be in good condition (minor surface rust or dents may be allowed) and compatible with the waste stored in them. A container can be defined as any portable device, in which a material is stored, transported, treated, disposed, or otherwise managed. Containers used at NCBC Gulfport include performance oriented packaging, steel drums, polyethylene drums, and portable tanks. Types and sizes of containers used are dependent upon factors such as the type of waste, the rate of generation, and the treatment/disposal method used. The NCBC Gulfport HWPM provides the container to be used for each waste at NCBC Gulfport.

Containers shall be properly closed and sealed at all times except when adding waste. The rings on drums shall be positioned with the bolt down and tightened. All containers will be kept closed except for when adding and waste. Proper closure means the following:

- a. All containers are closed per manufacturer's instructions;
- b. Bungs are securely tightened;
- c. Locking rings and bolts are properly secured with the nut tightened enough to prevent any person from loosening the nut using thumb and forefinger;
- d. Lever locks are properly secured with the handle arm properly secured under the safety tab;

NOTE: Lever locks are authorized in an SAA for containers holding solid hazardous and non-HWs. Locking rings provide better container integrity in the event of turnover.

- e. Funnel covers and latches are to be secured when waste is not being added. Gaskets are to be in good working order so to provide the protection intended in the event the container is tipped over or if applicable to the situation to prevent vapor emissions;
- f. Manual shut-off valves, including those used in conjunction with funnels, are in the closed position when not adding waste;
- g. Covers on containers will be in good condition with gasket in place and fully functional for the purpose intended;

NOTE: Any rust, dents or crimps affecting a cover in a manner which jeopardizes the integrity of the container is unacceptable and the cover is to be replaced.

NCBC Gulfport HWPM has final authority in determining the proper closure and or condition of a container holding waste at NCBC Gulfport.

Containers that cannot be properly sealed shall have the contents transferred to a proportionally sized container, or shall be placed in an over-pack container. There shall be no evidence of spills (e.g., no dry or wet waste on the outside of containers).

D.7.6 Labeling

Only NCBC Gulfport-approved labels shall be used on waste containers. Waste containers must be labeled according to the respective WSD and before adding a waste. The following is required for proper labeling of containers:

- a. Labeling will be evenly spaced (if applicable) and affixed to the upper or middle section of the container;
- b. Labels will be in print form, fully legible to the reader and completed using indelible marker;
- c. Labels that are faded marred and or illegible are unacceptable; and
- d. Labels are to be clearly visible at all times.

Labeling over an existing label is a violation of State law and NCBC Gulfport policy. If a new label is needed for any reason, always remove the existing label first before affixing the new one.

Containers will be positioned in such a manner as to allow an inspector clear and accessible viewing without having to move them. If Fiber Drums are used, make sure that the labels for that drum are placed in such a way so that they are not inadvertently covered by the lid of that drum. DO NOT place the label on the lid of a Fiber Drum since removing the lid will remove the label from the drum and that drum would be considered out of compliance. Also, if work is to be conducted off-hours and/or on weekends, the Contractor is responsible for making sure that there

are enough labels to affix to containers during these times.

Used Oil shall be labeled with the words "USED OIL". Used Petroleum-based products such as hydraulic fluids, lubricating oils, and diesel fuel marine, and other fuels with a flash point above 100 degrees Fahrenheit that do not contain solvents of any type, chlorinated or non-chlorinated, are managed as Used Oil.

Universal Waste shall have the Universal Waste label on the container, as well as the date the first waste is added to the container.

Non-hazardous waste shall have the Non-Hazardous Waste label on the container, with the name of the Contractor and the description of the waste in the container.

Sample labels are provided in Enclosure D-2.

D.8 Disposal

If the Contractor is managing an SAA, and the HWC determines that the cumulative total of HW is at 55-gallons, the HWC must carefully manage the disposal of the waste within regulatory constraints.

When the total quantity of hazardous waste reaches 55-gallons (or 1-quart of acute hazardous waste), the HWC must enter the current date on the Hazardous Waste Label in the "Accumulation Date" section and transfer the waste to a 90-day accumulation site or a TSDF within 3 days. If a HW container in an SAA has an accumulation date exceeding three days, it is deemed to be out of compliance. It is the responsibility of the Contractor to ensure the HW is transferred within the 3-day limit.

D.9 Spill Response Actions

The Fire Department and NCBC Gulfport Environmental waste management personnel respond to spills occurring at NCBC Gulfport. The following steps are part of NCBC Gulfport's contingency plan and shall be implemented whenever a spill occurs.

Immediately dial 911 from any NCBC Gulfport telephone and report the following:

- a. The location is NCBC Gulfport, and state the building number or street/intersection,
- b. The type of material (if known),
- c. The quantity of material (if known),
- d. Provide your name

In addition to notifying the Fire Department, also notify the NCBC Gulfport Command Duty

Officer and the NCBC Gulfport HWPM.

Personnel that are familiar with the chemical spilled and have been properly trained can assist by containing or diverting the spill away from any soil, water and/or storm drains. At a minimum when a spill has occurred, the area shall be secured until the appropriate response personnel arrive. The Fire Department is NCBC Gulfport's first responder. NO ONE shall enter into a situation that could potentially jeopardize personnel or the environment.

D.10 Inspections

Compliance oversight inspections will be performed weekly by the Contractor using the appropriate sample inspection forms located in Enclosure D-1 of this Appendix. The NCBC Gulfport HWPM may make periodic inspections. The Contractor is expected to correct deficiencies at the time of notification or within a timeframe that has been agreed upon by the Contractor and the NCBC Gulfport HWPM. Violations, on the other hand, must be addressed immediately. Any violation of hazardous waste regulations are the responsibility of the NCBC Gulfport Commanding Officer and it is the job of NCBC Gulfport HWPM to protect the CO from liability that may be the direct result of a Contractor's performance.

D.11 Monetary Penalties

If a Contractor's work site is visited by a State or EPA inspector and violation and/or deficiencies are identified which result in a Notice of Violation, then any monetary penalty that is associated with that Notice of Violation shall be the financial responsibility of the Contractor.

D.12 Recycling of Materials

Recycling intentions should be reviewed by the FEAD and NCBC Gulfport HWPM before implementing. The FEAD Project Manager will assist the Contractor with Government points of contact for recycling.

D.12.1 Recycling of Solvents

Solvents will not be recycled at this facility until the intended process is fully reviewed and approved in writing by NCBC Gulfport HWPM.

ENCLOSURE D-1
SAA AND 90-DAY INSPECTION FORMS

SAMPLE SAA INSPECTION FORM

Satellite Accumulation Area (SAA) Inspection Form			
Date:	Time:		
Command:	Bldg. Location:		
POC:	Telephone #:		
Inspector's Name:	Signature:		
INSPECTION ITEMS	YES	NO	COMMENTS
1. Are containers in good condition with no or minimal dents or corrosion?			
2. Are containers labeled Hazardous Waste or with other words identifying contents?			
3. When quantity of waste reaches 55 gallons, is waste transferred to the Less-than-90-day Storage Facility within 72 hours?			
4. Are containers properly closed?			
5. Is the Satellite Accumulation Area located at or near the point of generation?			
6. Is the hazardous accumulation limited to less than 55-gallon (or 1 quart Acute) of total accumulated hazardous waste?			
7. Is the 2-inch expansion rule in liquid containers complied with?			
8. Are accumulation/fill dates marked once 55-gallon limit is reached?			
9. Is waste compatible with the container?			
10. Are incompatible wastes kept separate?			
11. Is proper isle space maintained?			
12. Is the SAA clean (no signs of spillage) and are containers non-leaking?			
13. Are liquid waste containers placed in a berm area, or an area which will contain all leaks?			
14. Is a fire extinguisher available within 50 ft.?			
15. Is housekeeping neat and clean in all areas?			
16. Is there a spill kit in the accumulation area?			
17. Are containers inspected weekly?			
18. Does the assigned Hazardous Waste Coordinator and Alternate have proper training?			
19. Are training records maintained for three years?			
Comments:			

SAMPLE 90-DAY ACCUMULATION SITE INSPECTION FORM

Contractor Hazardous Waste 90-Day Accumulation Site Inspection Form			
Date:	Time:		
Bldg. Location:	POC:		
Inspector's Name:	Signature:		
INSPECTION ITEMS	YES	NO	COMMENTS
1. Has all accumulation of hazardous waste been limited to a time less than 90 days?			
2. Is the accumulation start date clearly marked and visible for inspection on each container?			
3. Is each container or tote/tank clearly marked with the words "Hazardous Waste?"			
4. Are hazardous wastes compatible with the containers in which they are stored?			
5. Are all containers in the accumulation area maintained in good condition?			
6. Are all containers free of leaks, bulging, and corrosion?			
7. Are all containers kept closed in accordance with DOT regulations and mfg. specifications?			
8. Is aisle space maintained at a minimum of 24 inches?			
9. Is the containment system free of cracks or gaps?			
10. Is the sump or collection area free of spilled or leaked waste and accumulated precipitation?			
11. Are containers holding ignitable or reactive waste at least 15 meters (50 feet) from the installation property line?			
12. Are incompatible wastes separated by means of a dike, berm, wall or other device?			
13. Are the containers protected from sources of ignition or reaction?			
14. Are smoking and open flame confined to specifically designated locations?			
15. Are "No Smoking" signs placed wherever there is a hazard from ignitable or reactive waste?			
16. Does the area have a "Hazardous Waste" sign posted?			
17. Is the area secured with a lock or other positive means to prevent access by unauthorized personnel?			
18. Is lighting in the area sufficient to identify leaks and spills?			
19. Is emergency contact information located near the communications equipment (telephone)?			
20. Are appropriate spill clean-up materials readily available?			
21. Is a copy of the RCRA Contingency Plan available?			
22. Do wastes requiring sampling have "Pending Analysis" labels filled out correctly?			
23. Are used oil storage tanks maintained in working order and inspected weekly along with the 90-Day Accumulation Site(s)?			
24. What is the latest HW container Accumulation Start Date?			

ADDITIONAL COMMENTS:

ENCLOSURE D-2

SAMPLE WASTE LABELS

HAZARDOUS WASTE

FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL

**IF FOUND, CONTACT THE NEAREST POLICE OR
PUBLIC SAFETY AUTHORITY OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY**

GENERATOR INFORMATION:

NAME: _____

ADDRESS: _____

CITY _____ STATE _____ ZIP _____

EPA ID NO. _____ EPA WASTE NO. _____

ACCUMULATION START DATE _____ MANIFEST TRACKING NO. _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

Figure D-1: Sample Hazardous Waste Label (Yellow)

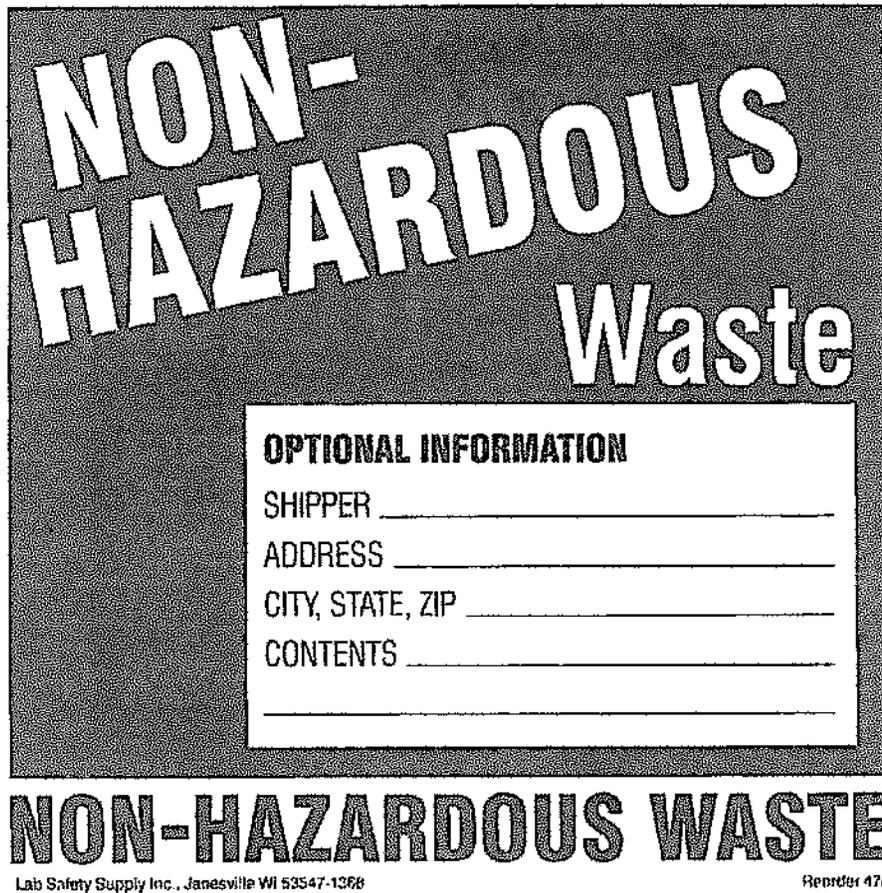


Figure D-2: Sample Non-Hazardous Waste Label (Green)

**UNIVERSAL
WASTE**

SHIPPER _____

ADDRESS _____

CITY, STATE, ZIP _____

CONTENTS _____

ACCUMULATION START DATE _____

www.accuforn.com • reorder # MHZ#16

Figure D-3: Sample Universal Waste Label (Purple)



Figure D-4: Sample Used Oil Label (Yellow)

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