

Appendix H

Hazardous Waste Management

H-1. Purpose.

a. Establishes policy, responsibilities and procedures for managing Hazardous Wastes (HWs), Universal Wastes (UWs), and Non-Hazardous Wastes (NHWs) that are generated and managed by Activities on of Fort Eustis and Fort Story.

b. Implements Installation policy to for complying with Department of Army, federal, state and local policies and regulations.

H-2. General Hazardous Waste Management (HWM).

a. The US Environmental Protection Agency (EPA) and the Commonwealth of Virginia, Department of Environmental Quality (VDEQ) consider each installation to be a single facility and generator of solid waste. Each installation is ultimately responsible for the proper management of hazardous materials and for all wastes generated on post, regardless of which activities actually manage hazardous materials or generate the waste. Each installation has its own EPA identification number (EPA ID) and mailing address, which must be, used on documents, e.g., official correspondence, manifests, labels, etc.

(1) Fort Eustis:

EPA ID Number: VA8213720321

Fort Eustis
US Army Transportation Center
ATTN: ATZF-PWE, Bldg 1407
Fort Eustis, VA 23604-5332
757-878-3915

(2) Fort Story:

EPA ID Number: VA 1213720815

Fort Story
US Army Transportation Center
ATTN: ATZF-PWE, Bldg 1407
Fort Eustis, VA 23604-5332
757-878-3915

b. Each installation is designated as a Large Quantity Generator of hazardous waste (LQG):

(1) LQG: LQGs generate 1000 kg or more per month during any calendar year. LQGs must properly ship Hazardous wastes within 90 days of the accumulation start date (ASD).

(2) The installations are only allowed to accumulate hazardous wastes in Temporary Storage Sites (TSSs) or Satellite Accumulation Sites (SASs).

(3) Accumulation Start Date (ASD): The ASD is a key compliance date for Hazardous Waste Management

(HWM) and Universal Waste Management (UWM). The ASD sets in motion when other actions must occur. The ASD must be assigned to a container of Hazardous Waste when HWs are first added to the container at a TSS or when the quantity limitation is reached at a SAS. The ASD must be assigned to a container of Universal Waste when UWs are first added to the container or the container is issued by the HWA. Once the ASD is placed on a container, it cannot be changed. The “shell game” of moving a container from one accumulation area to another or re-containerizing the hazardous or universal waste does not restart the ASD. *Do not falsify the ASD.*

(4) Each TSS and SAS must have a site specific Hazardous Waste Contingency Plan (HWCP) or Hazardous Material and Waste Contingency Plan (HMWCP).

(5) AECs, HWCs, HWSs, UWHs, and HWHs must meet specific training requirements. See Appendix C for training requirements.

c. Activities are required to comply with all HWM requirements at all times. Mismanagement of hazardous materials may be considered illegal HWM activity.

d. Hazardous Wastes (HWs) are defined as a solid waste that poses a potential hazard to human health or the environment when not properly managed due to its ignitable, corrosive, reactive, or toxic properties.

e. Non-Hazardous Wastes (NHWs) are defined as a special solid waste not meeting the definition of a hazardous waste and originating from hazardous chemicals or hazardous materials.

f. Universal Waste (UW) applies to a limited number of wastes that would otherwise have to be managed as Hazardous Wastes (HWs), e.g., batteries, lamps, pesticides, and mercury containing thermostats. Mismanagement of UWs will cause them to be managed as HWs. Mismanagement of UWs will be considered illegal HWM activity.

g. Hazardous Wastes (HWs) and Non-Hazardous Wastes (NHWs) will only be accumulated in Temporary Storage Sites (TSSs) or Satellite Accumulation Sites (SASs).

h. Activity Environmental Coordinators (AECs) may act on behalf of or in lieu of HWCs.

i. Activity level HWM Organization: For HWM purposes, AECs will provide management oversight of HWCs; HWCs will provide management oversight of HWSs and or HWHs; and HWSs should provide management oversight of HWHs.

j. Copies of all HWM records will be kept for at least three years. This includes training records, turn-in documents, inspection forms, etc.

H-3. Key applicable regulations.

a. Resource Conservation and Recovery Act (RCRA).

b. 40 CFR 260 –Series – Hazardous Waste Management System.

H-4. Activity Waste Identification: Each Hazardous Waste, Non-Hazardous Waste, and Universal Waste that an activity generates must be properly identified and classified.

a. Waste Description Logs (WDL): A written description prepared by the generating Activity of the waste which includes: names, quantities, and National Stock Numbers (NSNs) of HMs used (See the activity’s AUL); names and quantities of non hazardous materials used; and a description of the process used to generate the waste. The TCFE Form 646 (Figure K-2) will be used.

b. Activities must plan for anticipated waste generation prior to actual waste generation.

(1) Prior to generation: The WDL should be prepared based on the materials to be used and the proposed operational process.

(2) Post Generation: In addition to the above documentation for prior generation, laboratory analysis may be required.

(a) Generating activities knowledge may be used for unused commercial products or when the hazardous constituents from specific processes are well documented.

(b) Laboratory analysis will be used in other cases because often MSDS or product specifications are not sufficient to properly identify wastes.

(3) Laboratory analysis will be used for “unknown materials”.

b. Laboratory analysis: When laboratory analysis is required either due to an “unknown” situation or a poorly characterized waste, immediate priority must be given. The 90-day clock starts when the solid waste was generated or the “unknown” was discovered. Coordination with the HWAF is required ASAP.

(1) It’s the activity’s responsibility to fund for analysis. All purchase requests through contracting or other sources by the activity for sampling and analysis of waste streams will be coordinated with HWAF. Most sampling and analysis will be arranged through the HWAF and paid by Activity credit card.

(2) HWAF will secure sampling and analysis for activities as follows (all costs will be the activity’s responsibility and paid by the Activity’s government credit card):

(a) Sampling and analysis of unknown materials upon request.

(b) Sampling and analysis of poorly characterized materials or wastes.

(c) Periodic sampling and analysis of wastes turned in at the HWAF or accumulated at SASs and TSSs for the installation's QA/QC program. Activities should plan on sampling each waste stream annually.

(3) DPW-ENRD will assist when “abandoned” containers have been reported to the Military Police.

H-5. Waste Stream Classification:

a. Based on the information provided by the activity on the Waste Description Log, the HWAF will make a HW determination and classify the waste. It is extremely important that information provided by the activity is accurate! Misclassification of wastes is a major violation.

b. The HWAF verifies that the material is a SW and determines if any exceptions or exclusions can apply.

c. The HWAF determines if the SW meets the definition of a HW, if it meets any of the following criteria:

(1) It is a listed HW if:

(a) “P” - Listed (Acutely HW): Discarded commercial chemically pure products or sole active ingredient, off-specification species, container residues, or spill residues listed on the “P” list. Waste codes start with “P”, e.g. P001.

(b) “U” - Listed (Toxic HW): Discarded commercial chemically pure products or sole active ingredient, off-specification species, container residues, or spill residues listed on the “U” list. Waste codes start with “U” e.g. U001.

(c) “F” - Listed: Mostly spent solvents from non-specific sources. Waste codes start with “F” e.g. F001.

(d) “K” - Listed: Mostly wastes from specific manufacturing sources. Waste codes start with “K” e.g. K001.

(e) Container residues or spill residues from listed wastes.

(f) Mixture of SW and a listed hazardous waste.

(2) It is a Characteristic HW, if it exhibits any of the following characteristics (See Glossary for definitions):

(a) Ignitability.

(b) Corrosivity.

(c) Reactivity.

(d) Toxicity.

(e) Mixture of SW and characteristic HW, only if the resulting mixture exhibits a characteristic of a HW.

d. If the SW does not meet the definition of a HW and originated from a HM or HC, then it is classified as a Non-Hazardous Waste (NHW).

e. The HWAF will match the waste to an existing material profile or create a new profile.

f. Waste Tracking: Each container of waste must be tracked from origin to the final disposal. Various reporting requirements must be accomplished during this multi-year process.

H-6. Temporary Storage Sites (TSSs) and Satellite Accumulation Sites (SASs): Appendix K provides all the specific procedures to be used for managing TSSs, SASs.

H-7. Management of Containers. Appendix I provides all the specific procedures to be used for managing containers.

H-8. Transportation.

a. On-Post movements of HWs, UWs, and NHWs must meet the following requirements:

(1) Only government approved or licensed contractor vehicles will be used to move HWs, UWs, or NHWs - Absolutely no POV's.

(2) The HWC or AEC will supervise all movements of HWs and NHWs.

(3) Vehicles moving HWs, UWs, and NHWs will have fire extinguishers appropriate for the type of materials being moved.

(4) If containers of HWs, UWs, or NHWs have free liquids, then a spill kit will be carried.

(5) Vehicles must be placarded IAW DOT regulations as a guideline.

(6) A correctly completed DD Form 1348-1A, Turn-in Document IAW TAB 1 and or Container Content Log (CCL), will serve as shipping documentation.

(7) A correctly completed Container Content Log (CCL) IAW Appendix I TAB 1.

(8) Containers will be secured to prevent movement or spills.

(9) HWs will not be stored on vehicle(s) overnight.

b. Licensed Transporters. Only licensed transporters of HWs or UWs, will be allowed to transport HW or UWs, off either installation. These transporters will meet all requirements of DOT, EPA, and DEQ. No licensed transporter will bring HW or UWs onto either installation or between installations unless the HW or UWs is already correctly manifested and the licensed transporter is scheduled for pick up of HW or UWs at Fort Eustis or Fort Story.

H-9. General Disposal.

a. Activities will use the HWAFs for turn-ins or coordination of shipments of HW, UW, or NHW.

b. The HWAFs at Fort Eustis and Fort Story are operated by DPW-ENRD. The HWAF staffs are there to assist you, however they will not do your work for you.

c. All services offered by the HWAFs must be scheduled IAW TAB 2.

H-10. Non-Hazardous Solid Wastes and Special Solid Wastes.

a. The following hazardous and special solid wastes must be coordinated and or turned-in to one of the HWAFs:

(1) Hazardous Wastes.

(2) Non-Hazardous Wastes.

(3) PCB containing wastes.

(4) Asbestos containing wastes.

(5) Universal Waste Batteries

(6) Universal Waste Pesticides

(7) Universal Waste Thermostats.

(8) Containers of Free Liquids: Containers of liquids need to be identified as HWs or NHWs.

(9) Non-refillable compressed gas cylinders

(10) Compressed gas cylinders, unserviceable or rejected.

b. Fort Eustis Solid Waste, Recycling, and Pollution Prevention Center: Bldg 1209. The Following wastes are handled:

(1) Recyclables

(2) Municipal solid wastes.

(3) Household Hazardous Wastes.

(4) Universal Waste Lamps.

(5) Aerosol Cans.

c. Fort Story Solid Waste, Recycling, and Pollution Prevention Center: Bldg 1053. The Following wastes are handled:

- (1) Recyclables
- (2) Municipal solid wastes.
- (3) Household Hazardous Wastes.
- (4) Universal Waste Lamps.
- (5) Aerosol Cans.

d. Antifreeze: Antifreeze requires mandatory recycling. Activities must keep records of their recycling efforts. Only antifreeze that is grossly contaminated will be accepted at the HWAF. This will be evaluated on a case-by-case basis. An antifreeze recycler SOP is available at ENRD.

e. Aerosol Cans: All types of aerosol must be recycled. Aerosol cans must not be put into "Dumpsters" or mixed with Trash. Aerosol cans will not be stored with waste products in SASs or TSSs. These recyclable materials must be turned-in within 60 days of the date of initial accumulation or if the number of cans exceeds 50. Containers used to accumulate aerosol cans must be labeled as "Recyclable Materials". Cans being turned-in should be boxed or otherwise handled to prevent release of their contents. The CCL will be used as the turn-in document and does not have to be maintained during accumulation. The following line items on the CCL must be completed: 4, 7, and 20. Item 21 of the CCL should list each type of aerosol and quantity.

f. Parts Washers (Aqueous and Solvent). This use of this equipment typically causes the generation of several different wastes, e.g., solvent, filters, waste water, sludge, used oil, etc.). All wastes generated must be identified and managed correctly as HW, NHW, or Used Oil. The Used Oil from the operation of the oil skimmer will be collected in containers. All containers will be closed when the skimmer is not in operation. The container will be labeled as "Used Oil". This Used Oil may be added to the activity's Used Oil tank or container. SOPs for aqueous and solvent parts washers are available from ENRD.

g. Contaminated Used Oil:

(1) Used Oil that has been contaminated, usually with halogenated or non-halogenated solvents must be managed as a hazardous waste.

(2) Containers or tanks that held contaminated used oil must be cleaned before being used to hold used oil. The residue from the clean out must be managed as HW. Activities should contact the HWAF for tanking cleaning procedures.

h. Filter Management:

(1) Gasoline, Jet Fuel (all but JP8), Edge-Tek filters from Inland Technology Parts Washers, and any filter that has been contaminated with hazardous waste constituents must be managed as hazardous wastes.

(2) Recovered non-hazardous liquids will be managed as used oil (separate oils from fuels), recyclable antifreeze, or non-hazardous wastes. Filters must be drained of all fluids and separated into groups as listed below:

(a) Lube oil, transmission fluid, hydraulic fluid, Diesel fuel, jet fuel (JP8 Only), etc.

(b) Antifreeze.

(c) Air.

(3) Any filter which has metal as part of its construction will be recycled.

(a) Containers for filter recycling may be issued from the HWAF. HWAF issued containers may be delivered as part of normal operations.

(b) Containers not issued by the HWAF or SWCC need to be labeled as "Recyclable Materials".

(c) Containers of filters must **not** have any absorbents added.

(d) Containers must be turned-in when full. A CCL must be maintained for each container.

(4) Filters which do not have any metal content will be containerized and turned-in IAW paragraph (5) below. Non-metal filters will be crushed to remove most of the remaining fluids and disposed of as NHW or non-hazardous solid waste.

(5) Filter turn-in procedures:

(a) The CCL will be used as the turn-in document. The following line items on the CCL must be completed: 4, 7, and 20. Item 21 of the CCL should list each type of filter and quantity.

(b) Containers of filters will be turned-in at the SWRPPC or scheduled for pickup by the HWAF along with other waste operations.

THIS PAGE NOT USED