

Appendix I

Container Management

I-1. Purpose. This appendix establishes the requirements for the management of containers, e.g., Abandoned, Empty, Hazardous Materials, Hazardous Wastes, Non Hazardous Wastes, Universal Wastes, USED OIL, Recyclable Materials, Large Containers, etc.

I-2. General:

a. All containers must be properly labeled at all times. This includes serviceable materials, wastes, recyclable materials, and empty containers.

(1) Labels and markings must be replaced if they become damaged or lost.

(2) Labels have to remain on containers until they are sufficiently cleaned of residues and purged of vapors to remove any potential hazards.

(3) Labels and markings no longer applicable to the contents will be removed, defaced to make them unreadable, or painted over.

(4) Containers will be stored in such a manner that allows for easy access to container labels. Under no circumstances should containers have to be moved in order to read any label or opened to determined container contents.

b. Container usage and storage:

(1) If a container holding materials or wastes is not in good condition (signs of bulges, damage, or corrosion, etc) or begins to leak, the contents will be transferred to an approved serviceable container immediately.

(2) A container shall always be closed during storage except when it is necessary to add or remove materials or wastes.

(3) A container shall not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

(4) Incompatible materials or wastes will not be placed in the same container.

(5) A copy of the "Incompatible Materials" chart will be available at each site-specific HMs storage or accumulation site (TSS or SAS). Copies are available at Post Safety, Fire & Emergency Services, or HWAFF.

(6) Containers must be compatible with the materials or wastes being contained.

(7) Containers will not be reused for other purposes until the residues and hazards associated with the previously held materials or wastes are removed.

(8) Containers of materials or wastes which are incompatible with other containers of materials or wastes stored nearby will be separated or protected from the incompatible materials or wastes by means of a dike, berm, wall, or other device to prevent the mixing of incompatible materials if contents leak or are spilled.

(9) Containers must be kept on pallets if not using containment pallets or "HazMat Storage Buildings" with containment. Containers must be protected from the environment (rain, snow, etc.).

(10) Container storage areas must have sufficient containment to prevent releases to the environment from an undiscovered leak from the largest container.

(11) All material or waste storage areas will have adequate aisle space. Adequate aisle space will allow the unobstructed movement of fire protection; spill control, decontamination equipment and personnel in case of an emergency to the problem container(s) within a storage area.

(12) Serviceable products will not be stored with wastes. Wastes must be physically separated from other materials, e.g., chains or ropes with signs, fences, walls, etc.

I-3. Management of Unknown or Abandoned Containers: *ALL UNKNOWN OR ABANDONED CONTAINERS SHOULD BE HANDLED WITH CAUTION! DO NOT ASSUME THAT A LABEL ACCURATELY REFLECTS CONTENTS!*

a. Immediately, upon discovery or someone reporting an unknown or abandoned container, accomplish the following:

(1) If container is leaking, call 911.

(2) If the container is not leaking;

(a) Try to identify the contents from markings, labels, etc. Note date, time, and location.

(b) Try to identify the owner of the container(s) from area of responsibility, questioning personnel in the surrounding area, etc.

(3) If ownership can be determined, ensure appropriate personnel are notified and the container is properly managed.

(4) If ownership can not be determined, notify the Military Police (MPs), who will investigate to determine the owner of the container. The MPs will provide DPW-ENRD with a copy of their findings.

b. Containers not acted upon immediately (with 24 hrs) will become the property of the activity where the container is located.

c. DPW-ENRD will provide additional instructions and assistance on a case-by-case basis as required.

d. The reporting activity will be responsible for assisting HWAF personnel until the container is picked-up.

I-4. Empty Containers:

a. Containers may not be reused for other purposes or disposed until empty. RCRA empty containers are not managed as hazardous wastes, however, previously used containers must be:

(1) Sufficiently cleaned of residues and purged of vapors to remove any potential hazards before being classified empty.

(2) Previous labels have to remain on containers until empty.

(3) Previous labels must be removed, defaced, or painted over once the container is empty.

b. Empty containers must be labeled individually as “empty” unless the container storage area is clearly designated as a “storage area for empty containers”.

- c. Containers designated for spills will be labeled “EMPTY” and “FOR SPILL USE ONLY”.

I-5. Containers of Hazardous Materials:

- a. Containers of hazardous materials not properly labeled should not be accepted by the requisitioning activity.
- b. Labels must conform to OSHA, DOT, and Post Safety standards as required. The Post Safety Office can provide information on proper labeling requirements.
- c. The trade name on the label should match the trade name on the Material Safety Data Sheet (MSDS). If you do not have a MSDS for the product, request one from the HazMart or the supplying organization when you order the HMs.
- d. HM will be stored in well-ventilated areas. Temperature sensitive materials will be stored to prevent exposure to temperature extremes.

I-6. Containers of Hazardous Wastes (HWs) and Non Hazardous Wastes (NHWs):

- a. Only DOT approved containers will be used for waste accumulation. DOT approved containers must be marked with United Nations markings.
- b. Containers holding ignitable or reactive wastes shall be located at least 50 feet within the installation’s property line.
- c. Acquisition of containers and labels:
 - (1) For activities that use the HWAF for turn-ins, the HWAF will provide pre-labeled containers for wastes and “Empty” containers for spills to activities with approved TSSs or SASs on a reimbursable basis. The HWAF will also issue a partially completed Container Contents Log (CCL) for each container. See TAB 1.
 - (2) Activities that do not use the HWAF for waste turn-ins, the activity is responsible for all acquisition and “HazMat Employee” training requirements under DOT.
- d. A CCL must be kept for each container of HWs and NHWs. The HWAF will issue all container numbers, which must match the container number on the container label.
- e. Hazardous waste labeling:
 - (1) Containers of HW must have a HW label (correctly completed): The following information is required:
 - (a) DOT Proper shipping name.
 - (b) DOT ID Number.
 - (c) Name and address of the installation (See Appendix H).
 - (d) EPA ID Number (See Appendix H).
 - (e) EPA Hazardous Waste Codes.
 - (f) Accumulation start date (ASD) - entered as required by TSS or SAS personnel.
 - (g) Container number from the CCL should be written in the upper left hand corner of the HW label.

(h) Manifest document number - entered at time of shipment.

(i) DOT Hazard Class.

(j) DOT packaging group.

(2) DOT hazard class labels meeting DOT labeling requirements must be on each HW container (EPA and DOT labels must be within 6 inches of each other).

f. Non-Hazardous Waste labeling:

(1) Containers of non-hazardous wastes should be labeled with a non-hazardous waste label, correctly completed.

(2) The contents of the container must be adequately described. If the NHW is DOT regulated, all DOT shipping information must be entered and the appropriate DOT hazard class labels applied within 6 inches of the NHW label.

(3) Container number from the CCL should be written in the upper left hand corner of the NHW label.

(4) "Non regulated" labels should be avoided. The words "non-regulated" are often misleading. This label only means that this material is not regulated as a hazardous waste.

g. Activities will certify the contents of each container of waste are accurately listed on each CCL. The AEC and or the HWC will make this certification. When the activity does not have an AEC, the commander or director having appointing authority for the AEC will sign the CCL.

h. The Container Turn-in Log (CTL):

(1) Activities are required to maintain a calendar year CTL (Figure I -1) for each waste site. A CTL must be maintained and kept with the Activity's completed copy of the DD Form 1348-1As for each site.

(2) Most of the items on the CTL come directly from the CCL and DD Form 1348-1A and are self- explanatory. The following items may need clarification:

(a) Date of turn-in: This date must match the date the material was received by the HWAF or manifested (if other disposal options are used).

(b) Person turning-in: This should be the AEC or HWC.

I-7. Containers of Universal Wastes (UWs):

a. All containers of UWs must have a label indicating the type of UW, e.g., UW Lamps, UW Batteries, UW Pesticides, UW Thermostats.

b. All containers of UW must have the Accumulation Start Date marked on the label.

c. Some UWs will be required to have a DOT label.

d. All UWs excluding UW Lamps must be in DOT approved containers.

e. All UWs excluding UW Lamps will have a CCL.

- f. Turn-ins of all UWs excluding UW Lamps will be recorded on the CTL.
- g. Containers of UW Lamps will be closed in such a manner so that potentially broken lamp debris cannot be released from the container.
- h. UW Lamps cannot be stored in the same container with serviceable lamps.
- i. Broken lamps must be handled as UWs.

I-8. Packaging of Hazardous Wastes (HWs) and Non Hazardous Wastes (NHWs):

- a. Packaging may affect the disposal costs and options available for a specific waste stream.
- b. Do not mix waste streams in the same container.
- c. The following rules for packaging must be followed for turn-ins at the HWAFs or the waste will be rejected:
 - (1) Do not place free liquids in containers not approved for liquids, generally open-top type containers.
 - (2) Do not mix containers less than 5-gallon in capacity with containers that are equal to or larger than a 5-gallon in the same over pack container.
 - (3) Do not mix aerosol cans with any other containers in an over pack container.
 - (4) Do not mix solids and liquids in the same over pack container.

I-9. Containers or Tanks of “USED OIL”:

- a. Containers or tanks for used oil must be marked “USED OIL” not “Waste Oil”.
- b. Containers or tanks must be secured or locked to prevent contamination from unknown sources.
- c. Areas around “USED OIL” containers or tanks must be free of any signs of contamination.
- d. Containers of “USED OIL” should not be stored in TSSs or SASs.

I-10. Containers for Recyclable Materials:

- a. Containers of Recyclable Materials should be marked to indicate the commodity type, e.g., white paper, news paper, plastic, etc. These commodities need to be sourced separated.
- b. Containers used to stored aerosol cans waiting to be recycled must be labeled “Recyclable Materials Aerosol Cans”. Never used the word “waste”. These containers cannot hold other materials or trash.
- c. Containers used to stored antifreeze waiting to be recycled must be labeled “Recyclable Antifreeze”. Never used the word “waste”.

I-11. Large Containers:

- a. Large Containers are defined as shipping containers, connex boxes, Milvans, “HazMat storage buildings”, office or storage type trailers, trailers when separated from their tractors, etc.
- b. All large containers on the installation for more than 24 hours will have the following signs or labels:
 - (1) Name of owner or local organization.

(2) Address of owner or local organization.

(3) Individual name or point of contact of owner or local organization.

(4) Telephone number of owner or local organization.

c. Large containers used to store hazardous materials or wastes will be labeled or have the appropriate signs designating the type storage.

d. Immediately, upon discovery or someone reporting an “unknown or abandoned” container, the following must be accomplished:

(1) If container is leaking, call 911.

(2) If the container is not leaking;

(a) Try to identify the contents from markings, labels, etc. Note date, time, and location.

(b) Try to identify the owner of the container(s) from area of responsibility, questioning personnel in the surrounding area, etc.

(1) If ownership can be determined, ensure appropriate personnel are notified.

(2) If ownership cannot be determined, notify the Military Police (MPs), who will investigate to determine the owner of the container. The MPs will provide DPW-ENRD with a copy of their findings.

(a) If ownership can be determined, ensure appropriate personnel are notified.

(b) If ownership cannot be determined, then the MPs will handle the container as abandon property.

e. The owner will be liable for all costs associated with such investigations and disposal.

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