

Appendix K

Storage & Accumulation Site Management

K-1. Purpose. This appendix establishes the procedures for establishing, inspecting, and maintaining storage and accumulation sites for Hazardous Materials, Hazardous Wastes, Non-Hazardous Wastes, Universal Wastes, Recycling Materials.

K-2. General Requirements for all Hazardous Materials (HMs) Storage Areas and Hazardous Waste (HWs) Accumulation Sites:

a. Site Locations:

(1) Must be correctly sited where a spill or leak of HM, or HWs or NHWs would not constitute a discharge of wastes to surface waters, storm drains, or the sanitary sewage system.

(2) Must have containment in sufficient capacity to hold the largest volume of an undetected leak.

(3) Sites will be protected from the elements. Collection of rain water, HMs, or NHWs or HWs in the containment unit must be containerized and treated as a HW until determined otherwise.

b. Required equipment:

(1) An internal communication or alarm system capable of providing immediate emergency instructions to activity personnel.

(2) Telephone or hand-held two way radio capable of summoning emergency assistance from the military police.

(3) Portable fire extinguishers, and/or fire control equipment. Portable fire extinguishers must be a single 20 lb ABC Dry Chemical type or TWO 10 lb ABC Dry Chemical.

(4) Spill kit and decontamination equipment.

(5) Water, at adequate volume and pressure, to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray equipment.

c. All areas will have signs indicating (must be readable from 50 feet for outside locations):

(1) "Hazardous Materials Storage Area" or "Hazardous Waste Temporary Storage Site – TSS" or "Hazardous Waste Satellite Accumulation Site – SAS"

(2) "No Smoking"

(3) "Unauthorized Personnel Keep Out"

d. Emergency Response Information: "Points of Contact" and "Telephone Numbers" will be posted at each site.

e. Each area will have a site specific Contingency plan (CP) specifying emergency procedures to be followed by activity personnel.

f. Sites storing containers holding ignitable or reactive materials or wastes shall be located at least 50 feet within the installation's property line.

g. All areas must meet all applicable health, safety, and fire rules and regulations. Personnel should contact Post Safety and the Fire Department for specific requirements.

h. All materials and wastes stored in containers IAW Appendix I.

i. All sites will maintain a copy of the "Incompatible Materials Chart." Copies of this chart may be obtained from the HWAF.

K-3. Hazardous Materials Storage Areas:

a. All storage areas will be inspected at least monthly using the TCFE Form 192 (Figure K-1, Front Page).

b. An MSDS will be available on-site for each HM stored and/or used by that activity.

K-4. General Hazardous Waste Accumulation Site Management:

a. Fort Eustis and Fort Story are Large Quantity Generators and must properly manifest HWs with 90 days of the Accumulation Start Date (ASD); therefore each installation is authorized to accumulate Hazardous Wastes (HWs) in only two types of accumulation areas:

(1) Less than 90 Temporary Storage Sites (TSSs): TSSs are usually permanent long term waste accumulation sites that support ongoing operations. Occasionally, construction projects or other short term projects may require use of a TSS.

(2) Satellite Accumulation Sites (SASs). SASs can be permanent or very short term, i.e. days or weeks intended to accumulate very limited quantities and one type of hazardous waste.

b. TCFE Form 646, Waste Description Log (Figure K-2) provides a written description prepared by the generating Activity for each hazardous and non-hazardous 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. A copy of MSDSs, product specifications, or lab analyses will be kept with each WDL.

c. TCFE Form 199 "Temporary Storage Site and Satellite Accumulation Site Approvals" (Figure K-3) will be used for establishing a new site, relocating an existing site, or closing a site, the proposed action must be approved.

d. All TSSs and SASs will be inspected at least weekly (within 7 calendar days) using the TCFE Form 6036 (Figure K-4).

e. Due to mission requirements, a TSS or SAS may be inactivated for a short period of time. The inspection form must be annotated that all wastes have been turned-in and no un-corrected deficiencies remain. Upon reactivation, an initial inspection will be accomplished. DPW-ENRD, utilizing TCFE Form 199 will be notified within 3 working days of both inactivation and reactivation.

f. Non-Hazardous Wastes (NHWs) will be accumulated in TSSs or SASs.

g. Hazardous wastes generated during field training exercises on post or on vessels, which remain on-site over night, must be stored in a SAS.

h. The Virginia Department of Environmental Quality (VDEQ) must be notified by DPW-ENRD 15 days in advance

of accumulating wastes in a TSS. DPW-ENRD is required to keep an up to date list of all TSSs and SASs.

K-5. TSS and SAS Approval Process:

- a. DPW-ENRD must grant approval prior to closing a site.
- b. A TSS cannot be changed to a SAS or vice versa without prior written approval from DPW-ENRD.
- c. All activities using any type of outside or free standing storage building should coordinate with DPW Master Planner.
- d. TSS Approvals:
 - (1) The Fire Department, Post Safety Office, and DPW-ENRD must grant approval prior to establishing a new site or relocating an existing site.
 - (2) All TSS requirements must be met before the site can be used or approved.
 - (3) At least 20 days prior to the establishment and use of a TSS, a completed approval form must be submitted to DPW-ENRD. All items on the form must be completed. As a minimum, Waste Description Log (WDL) for each waste stream, and site specific Contingency Plan will be included. The form will be signed by the Commander or Director having AEC appointment authority.
 - (4) The Fire Department and Post Safety Office must ensure the proposed location or relocation meets fire and safety regulations for the wastes that will be accumulated. Their approval is for location only. The Fire Department and Post Safety Office may conduct additional inspections for fire and safety once the site is operational.
 - (5) DPW-ENRD will inspect the site prior to granting final approval. Each site will be given an approval number that must be used for waste disposal and reporting.
- e. SAS Approvals:
 - (1) All SAS requirements must be met while the site is operational.
 - (2) Within 3 days of the establishment and use of a SAS, a draft approval form must be submitted to DPW-ENRD. As a minimum, a Waste Description Log for each waste stream and draft site specific Contingency Plan must be included. This draft may be signed by the AEC. DPW-ENRD will inspect the site to determine if it meets SAS requirements and issue a provisional approval number. The Fire Department and Post Safety Office will be notified by DPW-ENRD.
 - (3) If the SAS is expected to continue operating for more than 30 days, then formal approval must be obtained within 30 days. The approval form will be signed by the Commander or Director having AEC appointment authority.
 - (4) The Fire Department and Post Safety Office must ensure the location meets fire and safety regulations for the wastes being accumulated.
 - (5) DPW-ENRD will inspect the site prior to granting final approval. Each site will be given an approval number that must be used for waste disposal and reporting.

K-6. Less than 90 Day Temporary Storage Sites - TSSs:

- a. May be located at a distant site from the point of initial generation.
- b. May receive HWs from multiple generation sites including SASs.

- c. May store any quantity of HWs.
- d. Accumulation start date must be the date that HW is first put into a container at the TSS or the accumulation start date put on at the SAS.
- e. All containers of HW must be transferred to the HWAF within 14 days of the accumulation start date or 17 days if the waste was transferred from a SAS.

K-7. Satellite Accumulation Sites - SASs:

- a. Must be located at or near the process generating the HW, where the waste initially accumulates and which is under the control of the operator of the process generating the waste.
- b. Must not accumulate more than 55 gallons of HW or one quart of acutely HW (P-listed and some high number F-listed wastes).
- c. The accumulation start date must be filled in when the quantities above are reached or when a smaller container is filled and ready to be turned in. These containers must be transferred to a TSS or the HWAF within three (3) days.
- d. Containers of wastes must be turned in within 1 year from the date of initial accumulation. (THIS IS NOT THE ACCUMULATION START DATE).

K-8. Universal Waste (UW) Sites:

- a. UW sites need to be sited where a spill or leak would not constitute a discharge to surface waters, storm drains, or the sanitary sewage system.
- b. UW sites, excluding UW Lamps must have containment in sufficient capacity to hold the largest volume of an undetected leak.
- c. Emergency Response Information: "Points of Contact" and "Telephone Numbers" will be posted at each site.
- d. The Accumulation Start Date (ASD) must be the date that UW is first put into a container or the date the UW container was issued by the HWAF.
- e. UWs, excluding UW Lamps must be turned-in at the Hazardous Waste Accumulation Facility (HWAF) within 270 days of the ASD.
- f. UWs that have liquids must have containment and the appropriate spill kits (acid, base, mercury, etc).
- g. Turn-in procedures in Appendix H for HWs will be used for UWs excluding UW Lamps.
- h. UW lamps must be turned-in at the Fort Eustis Solid Waste, Recycle, and Pollution Prevention Center Collection Center (SWCC), Bldg 1209 or the Fort Story Recycling Center, Bldg 1053 within 60 days of the ASD. Full containers must be turned-in within 10 working days and may not exceed the 60-day limit.
- i. Universal Waste storage sites do not require site approval or signs.
- j. Universal Wastes will be stored in existing SASs or TSSs where practical.
- k. Universal Wastes sites will be inspected at least monthly using the TCFE Form 192 (Figure K-1, Back Page).
- l. All Universal Wastes stored in containers IAW Appendix I.

K-9. Recycling Areas: To be published.

Appendix K Figure K-1 Page 1

Appendix K Figure K-3 Page 1

HWM Accumulation Site Approval

Instructions for completing this form are on the reverse side.

1. Request Date: _____ 2. Type of Accumulation Site: TSS SAS

Type of Approval being requested: (Check Only One)

3. Initial Notification of New SAS 5. Relocation of an Existing Site
 4. New Accumulation Site 6. Closure of an existing site

7. Temporary Action: Inactivation Reactivation Date by Activity: _____

Generating Activity: _____ 8. Building Number of Site: _____
 9. DODAAC: _____

10. Group or Brigade: _____
 11. Battalion or Directorate: _____
 12. Company or Division: _____
 13. Name and Grade of HWC: _____ Telephone: _____
 14. Name and Grade of AEC: _____ Telephone: _____

New Accumulation Site Requirements:

15. Copy of Site Map
 16. Copy of Site Specific Contingency Plan (CP)
 17. Copy of Waste Description Logs (WDL)

Closure of an Existing Site Requirements: 18. Existing Site Number: _____
 Date Closed by Activity: _____

19. Certification that no wastes are stored or will be stored at the site. Certified
 20. Has there ever been a spill at this site? Yes No
 21. If a spill has ever occurred, has the site been decontaminated? Yes No
 22. Copy of the last "Weekly Site Inspection" Checklist Included

23. I certify that the above information is complete and accurate.

Date: _____ Signature _____
 Name of Battalion Commander or Director: _____
 Telephone: _____ Title and Rank/Grade: _____

Approvals:

24. Post Safety Office: _____ Name and Title: _____ Date: _____
 25. Post Fire Department: _____ Name and Title: _____ Date: _____

DPW-ENRD Approval:

26. Date of Final Approval: _____ 27. Authorized Site Number: _____
 28. Date of Inact/React: _____ 29. Date of Final Closure: _____

 Signature of DPW, ENRD Personnel

Appendix K Figure K-3 Page 2**Instructions for TCFE 199**

ITEM 1: Enter the current date.

ITEM 2: Check either the TSS (Temporary Storage Site) block or the SAS (Satellite Accumulation Site) block depending on which type of site is involved.

ITEM 3: Within 3 working days of creating a new SAS, this form must be received by DPW-ENRD. Check item 3 and complete item 8 through 17 and Block 23. The Contingency Plan (CP) may be a draft and the AEC may sign the certification.

ITEM 4: For all TSSs and SASs which will be established for longer than 30 days, check item 4, complete items 8 through 18, and items 23 through 25 before submitting to DPW-ENRD. Commander or director must sign the certification.

ITEM 5: All requests for relocations must be coordinated with DPW-ENRD before any move is accomplished.

ITEM 6: Check item 6 and complete items 8 through 14 and items 19 through 23 before submitting to DPW-ENRD.

ITEM 7: Check either the Inactivation or Reactivation block. Complete items 19, 22, and 23 for Inactivations or item 23 for Reactivations. AECs may sign the certification. Sent to DPW-ENRD within 3 working days.

ITEM 8: Enter the building number of the site or closest building to the site.

ITEM 9: Enter the DODAAC number, which will be used, on the DD Form 1348-1A.

ITEM 10: Enter the Group or Brigade information or the activity's next higher headquarters.

ITEM 11: Enter Battalion or Directorate information.

ITEM 12: Enter Company or Division information.

ITEM 13: Enter name, grade, and telephone number of the HWC.

ITEM 14: Enter name, grade, and telephone number of the AEC.

ITEM 15: Check block and provide copy of strip map of the site's location. Does not need to be to scale.

ITEM 16: Check block and provide copy of site specific Contingency Plan (CP).

ITEM 17: Check block and provide copy of Waste Description Logs (WDL).

ITEM 18: Enter the Site Number for the existing site.

ITEM 19: Check block to certify that: "No wastes are currently being stored or will be stored at this site".

ITEM 20: Check "Yes" if any spills have ever occurred at this site, otherwise certify a "No" response.

ITEM 21: If "Yes" to item 19, the site must be decontaminated. Check if this has been done or not done.

ITEM 22: Check block and provide copy of the last "Weekly Site Inspection" checklist.

ITEM 23: The information listed above must be certified by the authority, which appoints the appropriate AEC.

ITEM 24: the Post Safety Office must approve the site location.

ITEM 25: the Post Fire Department must approve the site location.

ITEM 26: ENRD will issue a date of final approval of a new SAS.

ITEM 27: ENRD will conduct a final site inspection and issue a dated final Authorized Site Number, upon receiving

all approvals and associated documents.

ITEM 28: ENRD will issue a date of final approval of Inactivation or Reactivation.

ITEM 29: ENRD will issue a date of final closure.

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