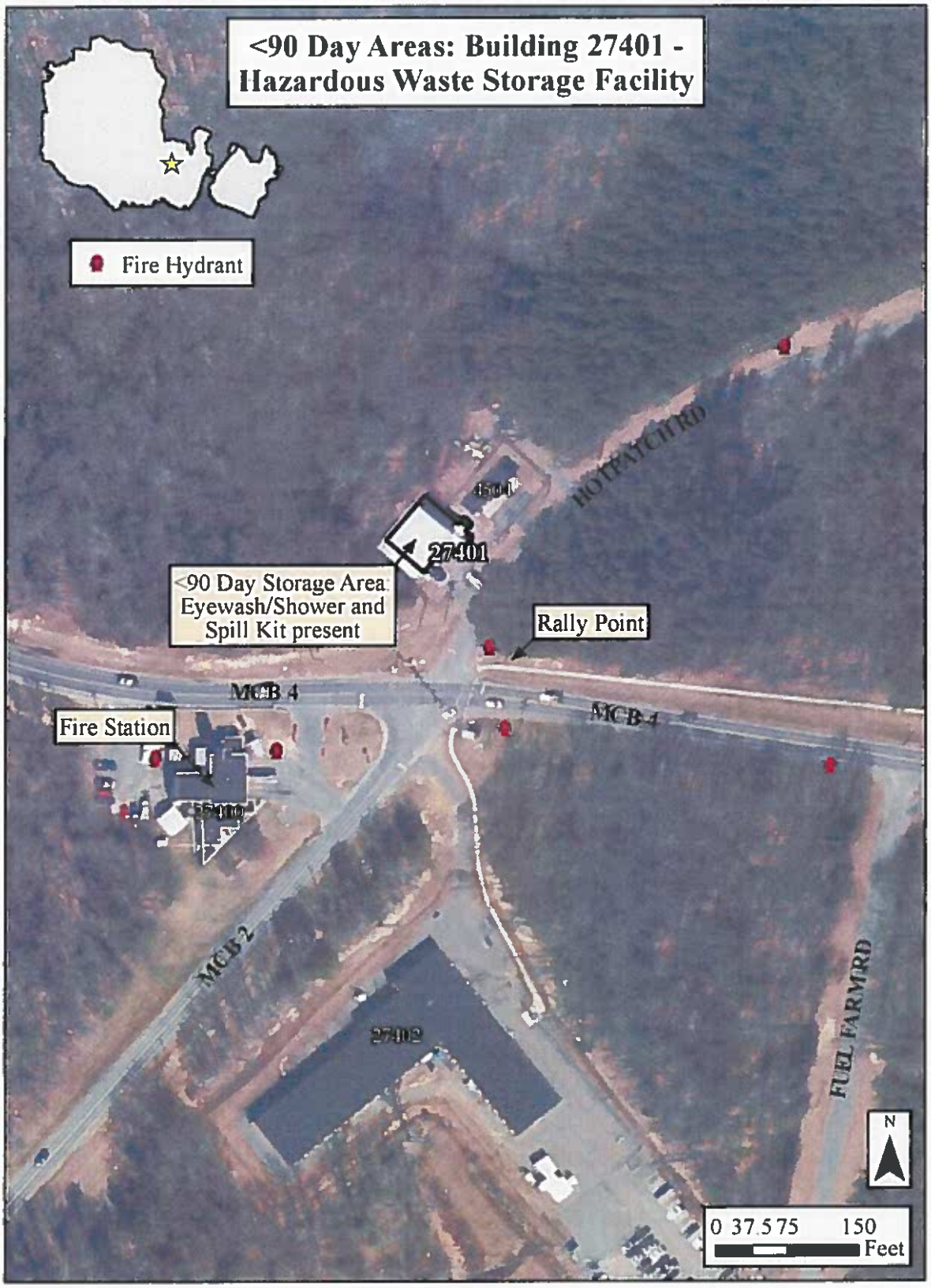
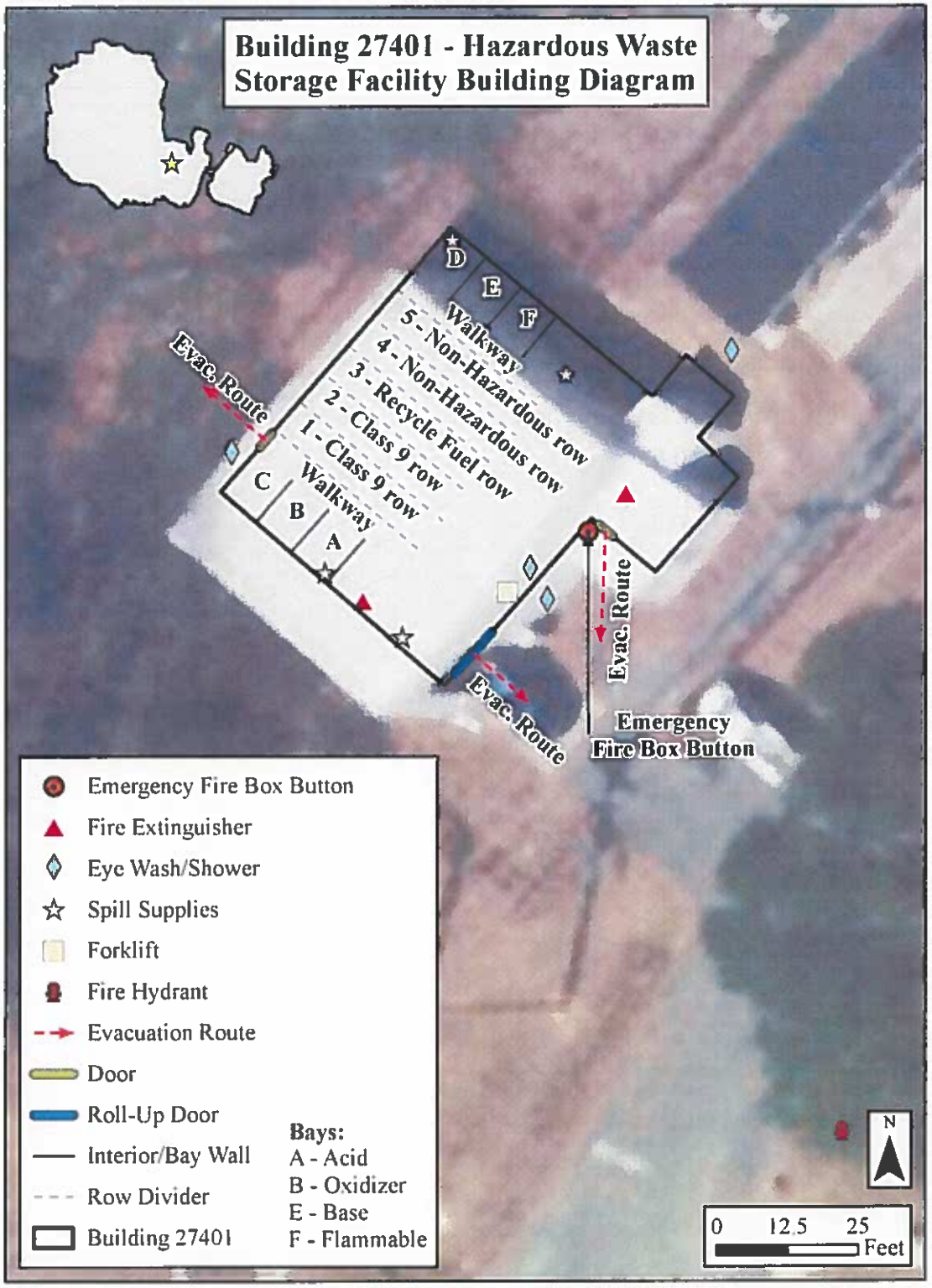
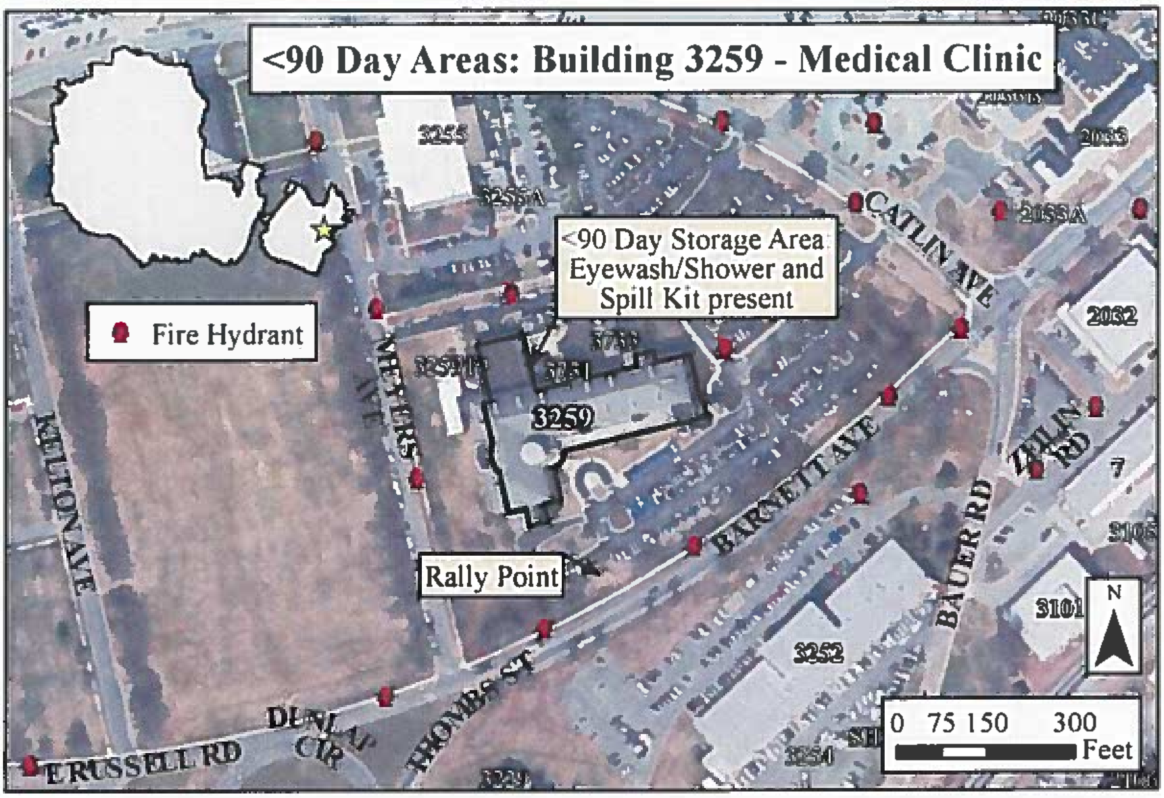
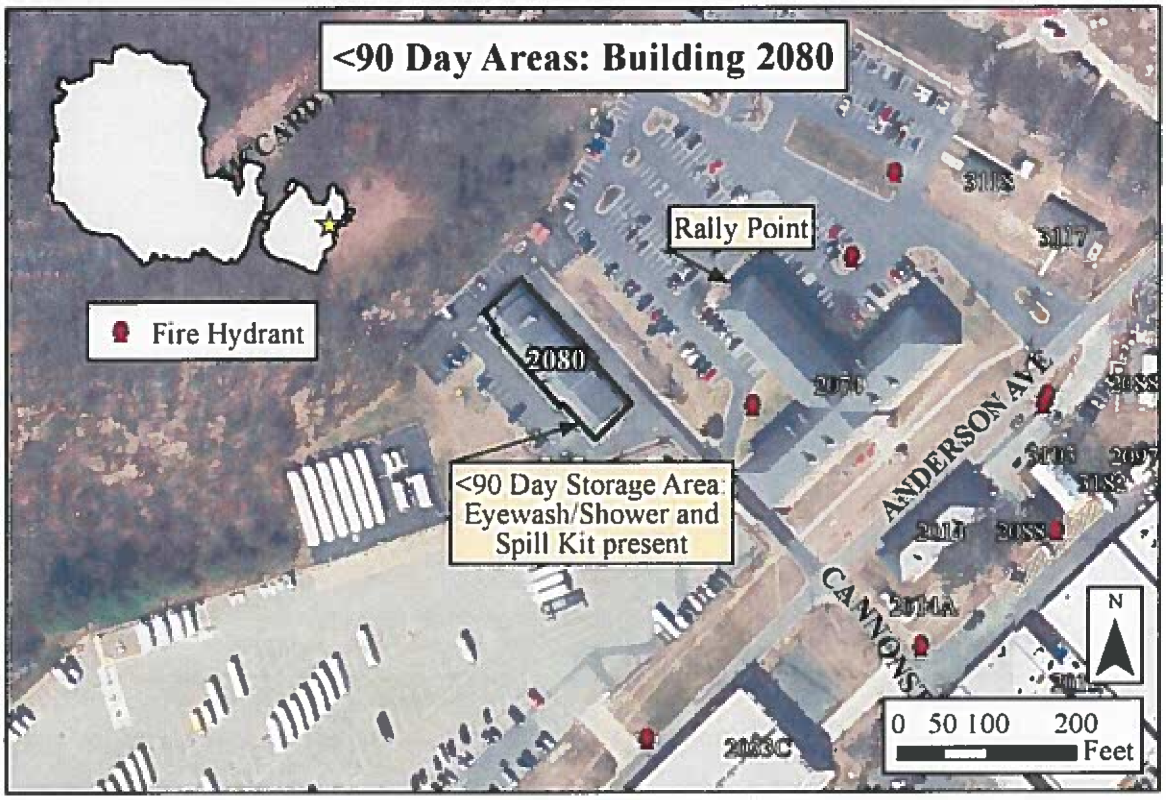
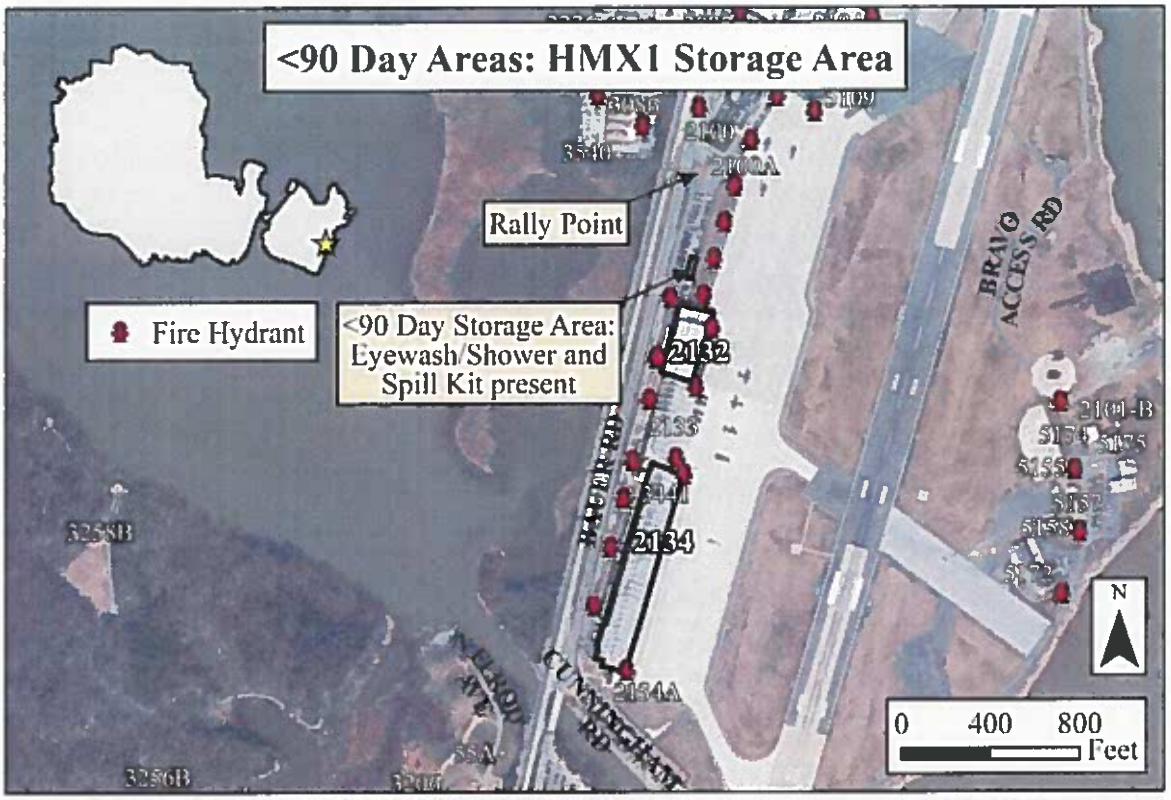
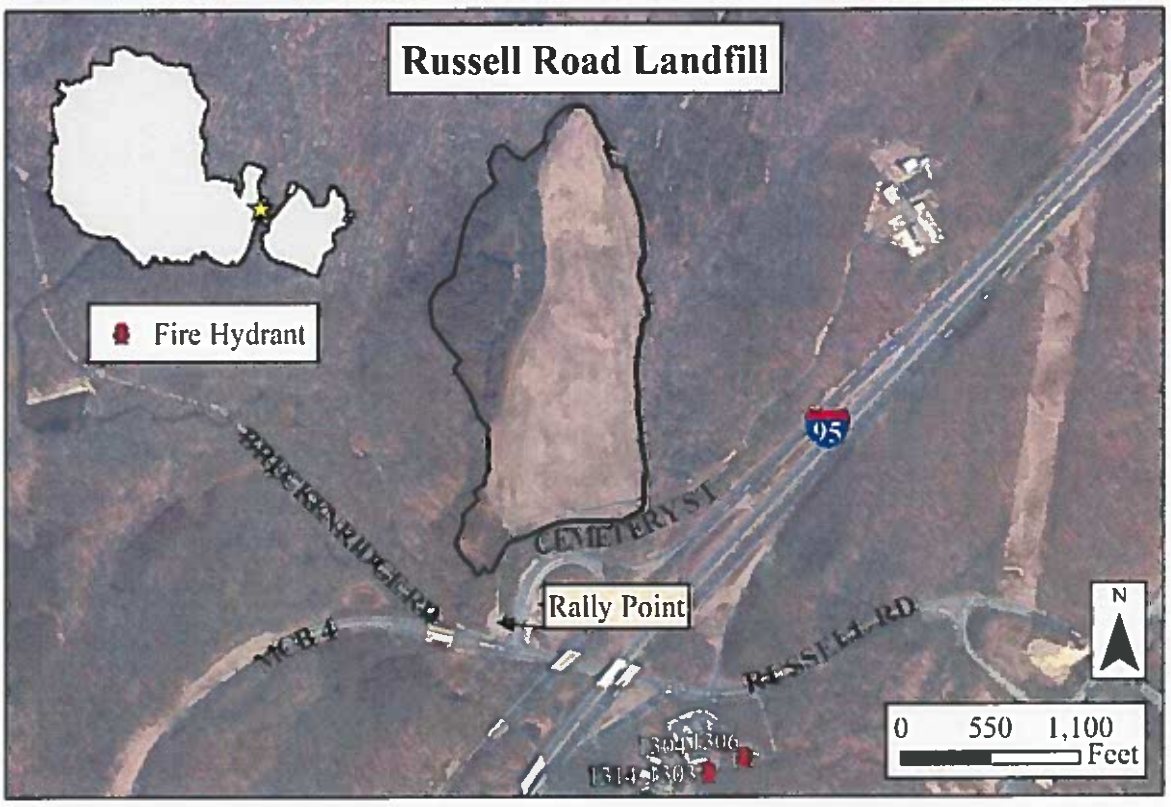

<90 Day Areas: Building 27401 - Hazardous Waste Storage Facility
Fire Hydrant
HOTPATCH RD
450-1
27401
<90 Day Storage Area Eyewash/Shower and Spill Kit present
Rally Point
MCB 4
MCB 4
Fire Station
55400
MCB 2
27402
FUEL FARM RD
N
0 37.5 75 150
Feet


Building 27401 - Hazardous Waste Storage Facility Building Diagram
D
E
F
Walkway
5 - Non-Hazardous row
4 - Non-Hazardous row
3 - Recycle Fuel row
2 - Class 9 row
1 - Class 9 row
Walkway
C
B
A
Evac. Route
Evac. Route
Evac. Route
Emergency Fire Box Button
Emergency Fire Box Button
Fire Extinguisher
Eye Wash/Shower
Spill Supplies
Forklift
Fire Hydrant
Evacuation Route
Door
Roll-Up Door
Interior/Bay Wall
Row Divider
Building 27401
Bays:
A - Acid
B - Oxidizer
E - Base
F - Flammable
N
0
12.5
25
Feet


<90 Day Areas: Building 3259 - Medical Clinic
Fire Hydrant
<90 Day Storage Area
Eyewash/Shower and
Spill Kit present
Rally Point
3255
3255A
3259
3252
3254
3101
2032
2033
2033A
CATLIN AVE
BARNETT AVE
MEYERS AVE
KELTON AVE
BAUER RD
THOMBS ST
DUNLAP CIR
E RUSSELL RD
N
0 75 150 300
Feet


<90 Day Areas: Building 2080
Fire Hydrant
Rally Point
<90 Day Storage Area
Eyewash/Shower and
Spill Kit present
2080
3117
ANDERSON AVE
CANNON ST
N
0 50 100 200
Feet


<90 Day Areas: HMX1 Storage Area
Rally Point
Fire Hydrant
<90 Day Storage Area: Eyewash/Shower and Spill Kit present
2132
2133
2134
2134A
BRAVO ACCESS RD
CUNNINGHAM RD
N
0 400 800
Feet


Russell Road Landfill
Fire Hydrant
Rally Point
CEMETERY ST
MCB-4
RUSSELL RD
95
N
0 550 1,100
Feet

Attachment C-3
SAAs

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SATELLITE ACCUMULATION AREAS

Location	Building	Waste Streams
Motor T Maintenance East	2013	Contaminated fuels Gasoline-soaked debris Lead-acid battery waste Aerosol waste F-24-soaked debris and filters Gasoline filters
Motor T Maintenance West	27054	Contaminated fuels Gasoline-soaked debris Lead-acid battery waste Aerosol waste Gasoline filters
Facilities Maintenance	3252	Paints and paint-related materials Broken lamps Lead-acid battery waste Expired corrosive cleaners Pesticide-contaminated debris Expired maintenance products (D001, D002)
Golf Course Maintenance	3066	Lead-acid battery waste Expired corrosive cleaners Pesticide-contaminated debris Gasoline-soaked debris Aerosol waste
Security Battalion	3164	Water contaminated with various fuels
MCAF Refuelers	5170	F-24-soaked debris and filters
TBS Health Clinic and Dental Clinic (Ray Hall)	24008	Dental amalgam Expired alcohols
Fuel Farm	27263	F-24-soaked debris F-24 lab waste
HMX GSE	2104	Armory debris containing lead
HMX-1	2134	Flammable paints and paint-related materials Corrosive paints and paint-related materials Broken lamps Lead-acid battery waste Expired corrosive sealants Flammable sealants Oxidizing sealants Contaminated F-24 fuels F-24-soaked debris Spent solvents Solvent-soaked debris Expired maintenance products (D001, D002)

Location	Building	Waste Streams
HMX-1 Health Clinic and MCAF Dental Clinic	2132 (2nd floor)	Dental amalgam Expired alcohols
TBS MT Maintenance	24009B	Contaminated fuels Lead-acid battery waste Aerosol waste
TBS Armory	24018	Armory debris containing lead Weapons cleaning solvents
TBS Ops	24142	Gasoline-soaked debris Broken lamps
TBS COMM	24009B	Lithium batteries
TBS AIB	24009B	Armory debris containing lead
MCCS Auto Hobby Shop	2080	Lead-acid battery waste Expired corrosive cleaners Pesticide-contaminated debris Gasoline-soaked debris Aerosol waste
Naval Medical Clinic	3259	Hazardous waste pharmaceuticals Non-hazardous pharmaceuticals Aerosol waste Fluorescent bulbs Unused solvents Unused corrosives
H&S Bn Armory	2006	Armory debris containing lead Broken lamps Fluorescent bulbs Aerosol waste Contaminated gasoline
Vet Clinic	3310	Hazardous waste pharmaceuticals Non-hazardous pharmaceuticals
Marine Security Guard	27275	Armory debris containing lead
OCS Medical Center A-168	5003	Aerosol waste Hazardous waste pharmaceuticals Non-hazardous pharmaceuticals
TBS Communications	24009	Lithium batteries
M&RA Marsh Center	3280	Lithium batteries Broken lamps
Sewage Treatment Plant	660	Expired waste
TBS Heat Plant	24162	Spent Solvents
Marine Corps Systems Command	2249 / 2201A / 2200	Lithium batteries Broken lamps
Museum	1775	Paints and paint-related materials Broken lamps Lead-acid battery waste Expired corrosive cleaners

Location	Building	Waste Streams
MCIA	2033	Lithium batteries Broken lamps
Crossroads Inn	3018	Lithium batteries Broken lamps
Marine Corps University	2040	Broken lamps
Expeditionary Warfare School	2077	Broken lamps
Marine Embassy School	27277	Broken lamps Armory debris containing lead
Commissary	2100	Broken lamps
Joint Non-Lethal Weapons	3097	Armory debris containing lead
NCIS Ops Center	Russell Knox	Armory debris containing lead
Guad Maintenance Shop 34	27001	Paints and paint-related materials Aerosol waste Broken lamps Lead-acid battery waste Expired corrosive cleaners Pesticide-contaminated debris Expired maintenance products (D001, D002)
Schools	3307	Paints and paint-related materials Broken lamps Expired corrosive cleaners Pesticide-contaminated debris Expired maintenance products (D001, D002) Chemistry lab (D001-D043) Medical waste
Davis Center MCCDC	3300	Lithium batteries Lead-acid battery waste
MLB – G6	3037	Lithium batteries Broken lamps
MCCS Maintenance	3167	Lithium batteries Broken lamps Expired maintenance products (D001, D002)
MCNOSC	27410	Lithium batteries Broken lamps
MCCS Vending	3164	Expired corrosive cleaners
MCCS Gas Station and MCX	3500B	Discarded alcohols Gasoline-soaked debris Lithium batteries Broken lamps Fluorescent bulbs
TDSA	28000	Lithium batteries Lead-acid battery waste

Location	Building	Waste Streams
4th LAR	26100	Contaminated fuels Gasoline-soaked debris Lead-acid battery waste Aerosol waste Gasoline filters
WTBn PWS	27250	Armory debris containing lead Spent bluing solutions Carbon lead swabs
Ordnance (S4)	3045	Expired weapons cleaning products (D001, D002)
Marina	3215	Expired maintenance products (D001, D002) Oily rags Used dry sweep Used oil
Raids and Recon	3230A	Lithium batteries Lead-acid battery waste
TDSA	28000	Lithium batteries Lead-acid battery waste
Museum Restorations	17001 Interstate Dr. Dumfries	Paints and paint-related materials Aerosol waste Blast media material
ITAM	3228	Batteries - lithium, nickel-cadmium, lead-acid Aerosol waste
McMart	3048	Batteries - lithium, nickel-cadmium, lead-acid
Firestone	3141	Batteries - lithium, nickel-cadmium, lead-acid Used oil
Recycle Reuse Center	3185	All waste streams
OCS Armory	2189A	Fluorescent bulbs Batteries - lithium, nickel-cadmium, lead-acid
Security Battalion Gates	All	Water contaminated with various fuels
Motor Pool	3015	Oily debris Gasoline-soaked debris Water contaminated with various fuels
MCCS West Side Gas Station and MCX	Hot Patch Road across from 27401	Discarded alcohols Gasoline-soaked debris Lithium batteries Broken lamps Fluorescent bulbs
Hazardous Waste Storage Building	27401	All waste streams

Attachment C-4
SAA Contingency Plan Template

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Contingency Plan Quick Reference Guide

Marine Corps Base Quantico (Base) is considered a Large Quantity Generator (LQG) of hazardous waste, therefore each accumulation area shall comply with the standards in 40 CFR 262 subpart M, Preparedness, Prevention and Emergency Procedures for LQGs (40 CFR §§262.15(a)(8) and 262.17(a)(6)). The Quick Reference Guide (QRG) is a brief summary of the information included in a contingency plan designed to provide emergency responders with information that will allow them to respond to emergencies safely and effectively (40 CFR 262.262(b)(1)-(8)).

1.0 Elements of a Quick Reference Guide

A Quick Reference Guide (QRG) must include the following elements as required in 40 CFR 262.262(b)(1)-(8):

a. The types/names of hazardous wastes at your facility in layman's terms and the associated hazard associated with each (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid) and estimated maximum amount of each hazardous waste that may be present at any one time, and identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff;

b. A map of the facility showing where hazardous wastes are generated, accumulated and routes for accessing these wastes, the locations of water supply (e.g., fire hydrant and its flow rate), fire extinguishers, and spill control material, on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and

c. The name of the emergency coordinator(s) and the 7/24-hour emergency telephone number(s).

1.1 Application and Implementation

Each accumulation area including hazardous waste (HW) and hazardous waste pharmaceutical (HW Pharms) satellite accumulation area (SAA) and less than 90 day, central accumulation area (CAA), universal waste (UW) and other non-regulated (NR) by RCRA exclusion accumulation areas shall create a Quick Reference Guide (QRG) that will be posted at each accumulation location. The provisions of this plan shall be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that could threaten human health or the environment.

1.2 Amendment Requirements

The QRG must be reviewed, and immediately amended whenever (40 CFR 262.263);

a. Applicable regulations are revised;

b. The contingency plan fails in an emergency;

c. The generator changes in its design, construction, operation (the practice), maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;

d. The list of emergency coordinators or unit command practice owner changes; or

e. The list of equipment changes.

1.3 Required Documents

NREA shall provide QRG template to each unit command on Base to complete in compliance with the regulatory requirements pursuant to 40 CFR 262.17(a)(6)-(7). Each completed QRG will be submitted to NREA's HW compliance staff and will be included in the MCBQ Hazardous Waste Contingency Plan (contingency plan). The emergency responders identified in the MCBQ Hazardous Waste Management Plan will receive copy(s) of the contingency plan; including all QRGs, and all revisions as required in 40 CFR 262.262(a).

Quick Reference Guide

MCB Quantico, EPA ID. VA1170024722, Quantico, Virginia

1.0 General Information

Provide the unit/command's location information in **Table 1**, including the number of SAA's and indicated whether or not there is a <90 day, CAA within the same building (number), and the ID number of the SAA (i.e. SAA-1). If there are more than one accumulation area within a building, the SAAs shall be numbered and each location requires its own Quick Reference Guide (QRG). This template allows additional rows to be added to the tables as needed and **Table 1** can be inserted at the top of each Attachment, as applicable.

Table 1: Location Information *(* example)*

Building Name	Building Number	Unit/Command	Number SAAs and/or CAAs	SAA ID
**Hazardous Waste Storage Building*	**27401*	**NREA*	**(1) SAA and (1) CAA*	**SAA-1*

1.1 Types of Generated Hazardous Waste

Provide the list in **Table 2** of the possible hazardous or non-regulated wastes that will be present in the identified SAA in **Table1**. Please note that each SAA may not exceed 55 gallons of non-acute HW and/or either one (1) quart of liquid or 1 kg (2.2 lbs.) of solid acute hazardous waste. Table 2 can be inserted at the top of each Attachment, as applicable.

Table 2: Possible Non-Regulated and Hazardous Waste(s) Present *(*example)*

Type/Common Name	Associated Hazard	Maximum Quantity
**spent solvent*	**ignitable*	**(1) 55-gallon drum*

1.1.1 Hazardous Wastes Requiring Special Medical Treatment

Provide a list in **Table 3** of any possible hazardous wastes that may be present in the identified SAA in **Table 2** that may require unique or special treatment by medical staff if exposed. If not applicable indicate with "**NA**". **Table 3** can be inserted at the top of each Attachment as applicable.

Table 3: Hazardous Wastes with Special Treatment Requirements

Hazardous Waste	Treatment

1.2 Emergency Response Coordinators, Practice Owners, and/or Duty Officers

At all times, there must be at least one employee either on-site or on-call to respond to an emergency by coordinating all emergency response measures. The duties and responsibilities of the emergency response are described in the MCBQ Hazardous Waste Management Plan (HWMP). Provide the unit command practice owner or duty officer per location contact information whom is identified as the as spill response as their Practice Aspect in **Table 4**.

Table 5 includes the NREA emergency coordinators' contact information; which are available 24 hours, seven (7) days a week as stated in the HWMP. The procedures and notification requirements for a response to an emergency are detailed in the HWMP. Please note that Alternates are not a requirement at the unit command level but are suggested as a best management practice. **Table(s) 4 and 5** can be inserted at the top of each Attachment, as applicable.

Table 4: Practice Owners or Duty Officers Contact Information

Position	Name	Contact Phone Number
Primary		
Alternate 1		
Alternate 2		
Alternate 3		

Table 5: NREA Emergency Environmental Coordinators' Contact Information

Role	Emergency Contact Phone Number
Compliance Manager	703-432-1335 (Office)
Spill Response Manager	703-432-0523 (Office)
Hazardous Waste Program Manager	703-432-0530 (Office)
NREA After Hours Cell Number	540-379-5143

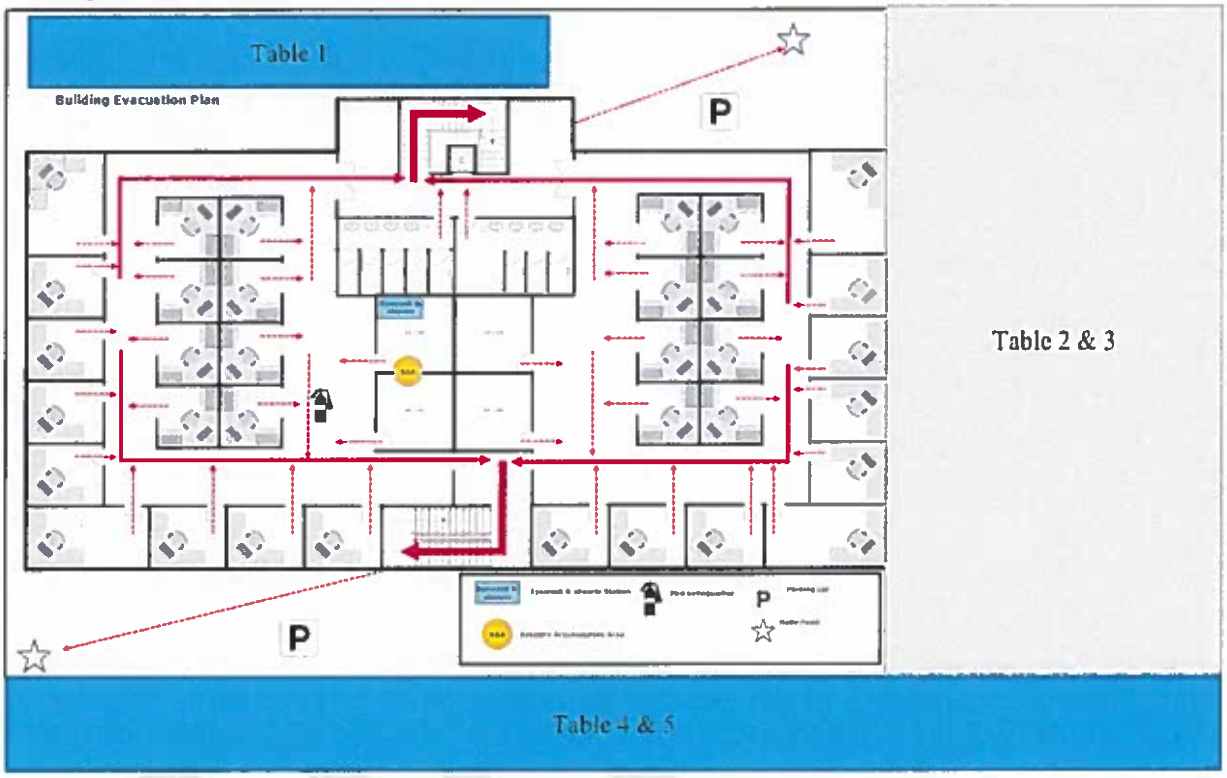
1.3 Attachments

Provide the following attachments. The attachments that are required to also be posted at the accumulation areas will be indicated in the narrative.

Attachment A: Location Map

A map showing areas where hazardous waste is generated, accumulated, treated or otherwise managed and routes for accessing these areas, onsite notification systems (e.g., fire alarm that rings onsite and offsite, smoke alarms), locations of fire extinguishers, eyewash and shower and spill control material. Additionally, the previous tables may be included in the design of the map.

**Example*



Attachment B: Waste Streams and Disposal

Provide the waste streams and disposal of waste generated in the location's operations in the table below *(*example)*.

Table B: Waste Streams

Waste Stream	Disposal
**Used Oil*	**Used oil sent for recycling as Non-Regulated Waste*

Attachment C: Inventory of Spill Response and Safety Equipment

Provide a list of spill response and safety equipment that will be maintained at this SAA in the table below *(*example)*. Please note that the column titled, "Quantity", is a suggested best management practice but not required.

Table C: Inventory of Spill Response and Safety Equipment *(*example)*

Quantity	Name of Item	Application Description
*1 bag	*Absorbent	*Apply to oil or fuel spills

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APPENDIX D

Training Documents

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The HW Coordinator is responsible to ensure that THIS UNIT/COMMAND is in compliance with the following regulations.

SAA Regulations

MCINCR-MCBQ is classified as an LQG of HW and must comply with all RCRA regulations for LQGs.

Accumulation [40 CFR 262.15] - This site is may accumulate up to 55 gallons of non-acute HW and/or either 1 quart of liquid acute HW or 1 kg of solid acute HW. Multiple HW containers may be used to collect various waste streams; however, a total of 55 gallons of HW (and/or either 1 quart of liquid acute HW or 1 kg of solid acute HW) cannot be exceeded and must remain at or near the point of generation and under the control of the operator or the process generating the waste.

Labeling [40 CFR 262.17(a)(5)]- The container must be marked with the words "HAZARDOUS WASTE" and an indication of the hazards of the contents (e.g., ignitable, corrosive, reactive, toxic), or other words that identify the contents of the containers. Labels must be consistent with the DOT requirements, OSHA Hazard Communication Standard, and/or NFPA Code 704 (commonly referred to as an "NFPA Diamond").

Containers [40 CFR 262.17(a)(1)(ii), (iii), and (iv)] - The container must be DOT-approved and in good condition. A container that leaks, has a large dent larger than a dollar bill, or shows excessive rust is not acceptable for storage of HW. The container must be compatible with the waste stored within. The container must remain closed and opened only to add, remove, or consolidate the HW, or to temporarily vent the container for proper equipment operation or relieve pressure. Containers are not be opened, handled, or stored in any way that could damage, rupture, or cause leakage. MCINCR-MCBQ requires that container storage areas be inspected at least weekly for signs of deterioration, corrosion, or leaks.

Transportation - Transportation should be scheduled just prior to the container reaching maximum capacity. Once the container is full, record the date on the label and call for HW pickup or transfer to a less than 90-day accumulation area. A DATED CONTAINER NOT TRANSPORTED WITHIN 3 DAYS TO A LESS THAN 90-DAY ACCUMULATION AREA IS SUBJECT TO RCRA VIOLATIONS.

HW pickup must be coordinated with the NREA Compliance Section. Phone numbers are provided below. **Only qualified NREA Environmental Compliance personnel may transport HW on MCINCR-MCBQ.**

Please allow 24 hours' notice for waste pickup Call NREA at (703) 784-4030	
(703) 432-0531	HW Operations Manager
(703) 432-0520	HW Non-Commissioned Officer (NCO)
(703) 432-0522	HW Inspector
(703) 432-0530	HW Program Manager

UW Regulations

MCINCR-MCBQ is a large quantity handler (LQH) of UW and must comply with Standards for UW Management listed at 40 CFR 273.

UW Batteries - Batteries that may be managed as UW include the following: lead-acid, lithium, mercury, silver-ion, and nickel-cadmium types. UW Site Managers/Handlers (i.e., HW Handlers) must place any UW battery in a DOT-approved container if the battery shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. If a DOT-approved container is not available, the damaged battery may be stored in a non-DOT-approved container onsite but will be transferred to a DOT-approved container prior to shipping. All containers used for UW batteries must be closed; structurally sound; compatible with the contents of the battery; and lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

If the casing of each individual UW battery cell is not breached, remains intact and closed, shows no evidence of leakage or spillage, and is properly prepared for shipment (e.g., strapped to pallets and/or containerized in hard rigid plastic containers), the following controls are permitted:

- Sorting UW batteries by type;
- Discharging UW batteries to remove the electric charge;
- Disassembling batteries or battery packs into individual batteries or cells;
- Removing batteries from consumer products; and
- Taping battery terminals to ensure arcing does not occur when turning in for off-site transfer.

UW Pesticides - UW pesticides include stocks of a suspended or canceled pesticide that are part of a voluntary or mandatory recall and stocks of other unused pesticide products that are collected and managed as part of a waste pesticide collection program. HW handlers manage UW pesticides to prevent release to the environment. UW Pesticides must be stored in a container that is closed; structurally sound; compatible with the pesticide; and lacks evidence of leakage, spillage, or damage.

UW Mercury-Containing Equipment - Mercury-containing equipment includes devices, items, or articles that contain varying amounts of elemental mercury. Typical devices include thermostats, barometers, manometers, temperature and pressure gauges, and mercury switches. HW Handlers manage mercury-containing equipment to prevent releases to the environment. Mercury-containing equipment must be placed in a separate container if it shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. The container must be closed; structurally sound; compatible with the contents; lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions, and be reasonably designed to prevent the escape of mercury into the environmental by volatilization or any other means.

If UW mercury-containing equipment does not show evidence of leakage, spillage, or damage that could reasonably cause leaks, HW Handlers may remove mercury-containing ampules from UW mercury-containing equipment, provided the handler performs the following:

- The ampules must be removed and managed in a manner designed to prevent breakage; and

- The removed ampules are subsequently placed in a container meeting the conditions above for leaking, damaged or compromised UW mercury-containing equipment, and with appropriate packing materials adequate to prevent breakage during storage, handling, and transportation.

If the non-mercury containing components of the waste do not exhibit characteristics of HW, the waste may be disposed as SW.

UW Lamps - Lamps often exhibit the toxicity characteristic due to mercury or lead contained within, making them a HW when discarded. Lamps managed in accordance with UW regulations and transferred to another UW Handler or permitted destination facility, may be managed as UW. Examples of common UW lamps include, fluorescent, high-intensity discharge, neon, mercury vapor, high pressure sodium, and metal halide lamps. UW lamps must be managed to prevent any release to the environment. Intact lamps must be stored in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Containers must remain closed and lack evidence of leakage, spillage, or damage that cause leakage under reasonably foreseeable conditions. Broken lamps will be immediately cleaned to prevent the potential release of mercury or other hazardous constituents to the environment. Broken lamps or lams not managed in accordance with UW regulations must be managed as HW. MCINCR-MCBQ prohibits crushing UW lamps.

UW Labeling/Marking - Adhere the standard, purple "UNIVERSAL WASTE" label UW to the container. Immediately write the ASD. Write UW type and details under Contents. Within 3 inches to either side of the label, place the DOT Class 9 diamond. The UW will be shipped in labeled and marked DOT-approved containers to another UW Handler or permitted destination facility.

UW Accumulation Time Limits - Mark each container with the ASD at the earliest date any UW was received. Regardless of the volume of UW accumulated, it must be shipped within one year from the ASD.

UW Employee Training - All employees must be thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal operations and emergencies.

UW Responses to Releases - Immediately contain all releases. Determine whether any material resulting from the release is a HW, and if so, manage the HW in compliance with all applicable requirements.

Aerosol Cans - Aerosol cans of any type are managed as HW.

Non-Regulated or Non-HWs

Non-Regulated or Non-HWs are not accumulated at SAAs and are exempt from HW RCRA regulations; however, can become a HW if they are mixed with or contaminated by a HW. Non-HW may include used oil, used antifreeze, used absorbent, oily rags, diesel-contaminated water, latex paint, and alkaline batteries. These wastes are not regulated as HW but require special handling to ensure proper disposal.

Containers - All non-HW is accumulated in containers that remain closed when not adding or removing material and lack evidence of leakage, spillage, or damage that cause leakage under reasonably foreseeable conditions. Non-HW must not be mixed with other wastes. Mixing non-HW with other substances such as oil or solvents prevents its ability to be recycled and/or may cause it to become HW.

Labeling/Marking - Each non-HW container must be labeled as to its contents. Adhere the standard, blue "NON-REGULATED WASTE" label. Write the Non-HW type under Constituents.

Used Antifreeze Labeling/Marking - MCINCR-MCBQ requires all used antifreeze to be disposed within 1 year; therefore, an ASD is required on used antifreeze containers.

Used Oil Labeling/Marking [40 CFR 279] - Used oils that are NOT contaminated with solvents, glycols, or fuels are exempt from HW regulations under RCRA if they will be recycled or reprocessed. Used oils are typically generated through vehicle and equipment maintenance and include motor oil, hydraulic fluid, electrical insulating oil, transmission fluid, compressed oils, cutting oils, and coolants. Mixtures of used oil and HW are managed under HW RCRA regulations. Stencil "USED OILS FOR RECYCLE" on the container. (Note: Labeling the contents "WASTE OIL" indicates the material is not suitable for recycling and will be managed as HW). Add the ASD to the container at the date it is declared used oil for recycling.

Recycling - If the waste is recycled, the recycling facility must be authorized by the federal and/or state environmental regulatory agencies, as applicable.

IF YOU HAVE ANY QUESTIONS CONCERNING THE MANAGEMENT OR INTERPRETATION OF THE REGULATIONS CONCERNING HW, NON-HW, OR UW, PLEASE CONTACT NREA AT (703) 784-4030.

The HW Coordinator is responsible for properly managing the waste(s) at SAAs and UW sites within the Command/Unit and must be familiar with MCINCR-MCBQ's HWMP.

Satellite Accumulation Training/UW Training [40 CFR 262.17(a)(7)]

Training is provided to all personnel that manage or handle HW and/or UW. Qualified personnel from the Environmental Affairs branch of NREA or HW Coordinators at less than 90-day accumulation areas may provide the required training. Training is documented by NREA and copies of training records must be posted at each site. Training includes the following topics:

Identification and Labeling of Waste

- Recognizing and identifying waste (HW, Non-HW, UW)
- Container markings
- Compliance
- SDSs

Management of Containers

- Selecting and purchasing containers for HW, Non-HW, and UW
- Checking for damage or leaks
- Empty container management
- Proper head space
- Safety
- Compatibility

Accumulation

- When to record the ASD (SAA vs. UW storage)
- Maximum quantity of HW, Non-HW, or UW that may be accumulated
- Storage time limits for HW, Non-HW, and UW

Handling and Transportation of Waste

- Proper protective equipment (PPE)
- How to report spills
- Use of open Government vehicles for transportation

Miscellaneous

- Specific training concerning applicable waste streams
- HW, Non-HW, and UW packaging
- SW storage requirements
- Types of UWs: Batteries (lead-acid, lithium, magnesium, nickel-cadmium), lamps, pesticides, mercury- containing equipment, and mercury containing thermostats.

Command/Unit:	Site/Location:	Building Number:

HW OTJ Trainer:	Contact Phone #:

List specific waste streams at this site:

1.

2.

3.

4.

5.

6.

I HAVE RECEIVED SATELLITE ACCUMULATION TRAINING, UW TRAINING, AND DETAILED TRAINING CONCERNING THE WASTE STREAMS GENERATED BY MY ACTIVITY.

Printed Name and Rank _____ Signature/Date _____

Printed Name and Rank _____ Signature/Date _____

Printed Name and Rank _____ Signature/Date _____

Printed Name and Rank _____ Signature/Date _____

Printed Name and Rank _____ Signature/Date _____

Printed Name and Rank _____ Signature/Date _____

Table D-1: HW Training Matrix

COURSE DESCRIPTION REFERENCES: • RCRA: 40 CFR 262.17(a)(7) • OSHA: 29 CFR 1910.120(e) • DOT: 49 CFR 172 Subpart H • MCO 5090.2, Vol. 9, Ch. 3, Section 030501.M.4 • OPNAVINST 5090.1C (series), Chapter 29 (paragraph 5.6)	HW COORDINATORS			NREA BRANCH PERSONNEL					
	Less Than 90-Day Accumulation Area	SAA/MSA	UW Site	HM/HW Program Personnel	Solid Waste Program Personnel	Air Program Personnel	Tank Program Personnel	Water Program Personnel	Remediation Program Personnel
INITIAL TRAINING [1]									
1. RCRA HW TRAINING (24-HR)	X			X	X	X	X	X	X
2. OSHA HM/HW GENERAL SITE WORKER COURSE (24-HR)				X	X	X	X	X	X
3. SAA TRAINING		X	X						
4. UW SITE TRAINING		X	X						
5. DOT HM/HW TRAINING				X	X				X
6. MCINCR-MCBQ INSTALLATION RESTORATION (IR) TRAINING				X	X		X		X
7. LANDFILL TRAINING				X	X				X
8. ENVIRONMENTAL QUALITY SAMPLING				X	X			X	X
REFRESHER TRAINING [1]									
9. RCRA HW REFRESHER	X			X	X	X	X	X	X
10. OSHA HM/HW GENERAL SITE WORKER REFRESHER (8-HR)				X	X	X	X	X	X
11. SAA REFRESHER		X	X						
12. UW SITE REFRESHER		X	X						
13. DOT HM/HW REFRESHER (every 3 years)				X	X				X
14. MCINCR-MCBQ IR PERMIT REVIEW				X	X		X		X

COURSE DESCRIPTION REFERENCES: • RCRA: 40 CFR 262.17(a)(7) • OSHA: 29 CFR 1910.120(e) • DOT: 49 CFR 172 Subpart H • MCO 5090.2, Vol. 9, Ch. 3, Section 030501.M.4 • OPNAVINST 5090.1C (series), Chapter 29 (paragraph 5.6)	HW COORDINATORS			NREA BRANCH PERSONNEL					
	Less Than 90-Day Accumulation Area	SAA/MSA	UW Site	HM/HW Program Personnel	Solid Waste Program Personnel	Air Program Personnel	Tank Program Personnel	Water Program Personnel	Remediation Program Personnel
15. LANDFILL REFRESHER TRAINING				X	X				X
16. RCRA HW GENERATOR (online when timeframes cannot be met due to scheduling conflicts with CECOS/NREA)	X			X	X		X	X	X
17. OTJ TRAINING [2]									
Must be approved and documented by HW Coordinator's Supervisor, HW Program Manager, and Environmental Training Coordinator.	X	X	X	X	X		X	X	X

[1] Training may be classroom or online
[2] May be substituted for any refresher training

Table D-2: Course Descriptions

INITIAL TRAINING
1. RCRA HW TRAINING **Course Length:** 24 hours **Taught By:** Naval Civil Engineer Corps Officers School (CECOS)/NREA **Description:** This RCRA course trains personnel that work with, store, and dispose of HM/HW to perform their duties safely and in compliance with legal requirements as well as help meet the annual refresher training requirement. Topics include: • HM/HW laws and regulations • HM/HW management policies • HW identification and classification • HW labeling, packaging, handling, and transportation requirements • Health/environmental effects and personal safety • Emergency response procedures **Who Should Attend:** Personnel who generate, package, handle, store, transport, or manage HM/HW in the performance of their normal duties
2. OSHA GENERAL SITE WORKER COURSE **Course Length:** 24 hours **Taught By:** NREA/CECOS **Description:** This course provides personnel who work at HW sites with the initial health and safety information they need to perform their duties safely and in compliance with 29 CFR 1910.120(e). The course also focuses on how to comply with RCRA HW generator requirements. This course covers the following concepts: • Safety • Hazard recognition • Toxicology • Air monitoring instruments • PPE • Physical hazards • Drum handling • Decontamination • Laws and regulations **Who Should Attend:** Individuals who package, handle, store, transport, and manage HM/HW, and who require initial safety training

INITIAL TRAINING
3. SAA TRAINING **Course Length:** Varies. Dependent on waste stream(s) and questions from personnel, generally less than 30 minutes **Taught By:** NREA staff and/or HW Site Managers and/or Environmental Coordinators **Description:** Addresses appropriate accumulation, container selection (ensuring the container is compatible with the waste to be containerized), handling and transportation procedures at SAAs and MSAs. See CETEP Training Document 9.1.5. **Who Should Attend:** All personnel in charge of satellite accumulation and personnel who handle HW in SAAs and MSAs
4. UW SITE TRAINING **Course Length:** Varies. Dependent on waste stream(s) and questions from personnel, generally less than 30 minutes **Taught By:** NREA staff and/or HW Site Managers and/or Environmental Coordinators **Description:** Addresses appropriate accumulation of UW, container selection, handling and transportation procedures at UW accumulation sites. See CETEP Training Document 9.1.5. **Who Should Attend:** All personnel that accumulate UW
5. DOT HM/HW TRAINING **Course Length:** 24 hours **Taught By:** Commercial providers, such as Environmental Resources Center (ERC) **Description:** This RCRA course provides training on DOT HM/HW transportation and manifests in compliance with 49 CFR 172 Subpart H. The course includes: • Regulatory changes that have occurred recently • Shipping goods • Classifying materials • Packaging, marking, labeling, and shipping • Manifests **Who Should Attend:** Environmental Protection Specialists (e.g., NREA Staff) and anyone who has duties/ is responsible for the shipment of HM/HW and/or the signing of HW manifests

INITIAL TRAINING
6. MCINCR-MCBQ IR TRAINING **Course Length:** 4 hours **Taught By:** NREA Remediation Program Manager **Description:** This course provides training on all permits managed by the MCINCR-MCBQ Remediation Program including Russell Road Landfill. Topics include: • Permits • General facility conditions • Post-closure care • Detection and assessment monitoring • Inspection schedule • Compliance issues **Who Should Attend:** Environmental engineers or anyone who manages permitted landfills
7. LANDFILL TRAINING **Course Length:** 8 hours **Taught By:** NREA Compliance Section **Description:** This course provides compliance with legal requirements training for personnel who work at the Russell Road Landfill. Topics include: • Landfill laws and regulations • Groundwater monitoring • Gas management program • Landfill inspection and maintenance requirements • Health/environmental effects and personal safety • Emergency response procedures **Who Should Attend:** NREA HW staff, Facility Maintenance Shop personnel who maintain landfill, Rhea contractors

INITIAL TRAINING

8. ENVIRONMENTAL QUALITY SAMPLING

Course Length: 24-Hour RCRA Course

Taught By: CECOS

Description: This course is designed to satisfy the training requirements for Navy environmental samplers specified in Chapter 29 (paragraph 5.6) of OPNAVINST 5090.1C (series) by providing training on basic sampling techniques (grab / composite / multi-increment sampling, avoidance of cross-contamination, use of preservatives, etc.) and specific sampling techniques for soil, potable water, waste water (including stormwater), groundwater and HW. Topics include:

- Completion of environmental sampling paperwork (e.g., sample container labeling, field log books, chain of custody documentation)
- Health and safety considerations
- Field testing techniques (i.e., use of pH meter, conductivity / total dissolved solids meter, temperature indicator, and dissolved oxygen meter)
- Use of a flow-through cell for micro purging of monitoring wells.

Who Should Attend: This course is required for environmental samplers as specified in Chapter 29 (paragraph 5.6) of OPNAVINST 5090.1C (series) in the performance of their duties

REFRESHER TRAINING

9. RCRA HW REFRESHER

Course Length: 8 hours

Taught By: CECOS/MCINCR-MCBQ CETEP Coordinator

Description: This course provides personnel with updated regulatory and technical information needed to perform their duties safely and in compliance with all legal policies and requirements. The course reviews:

- HM/HW laws and regulations (40 CFR, 29 CFR, 49 CFR)
- HM/HW management policies
- Compliance
- HW identification and classification
- HW labeling, packaging, handling, and transportation requirements

Who Should Attend: Personnel who have taken the initial the 3-day (24-hr) course and require annual updated training

INITIAL TRAINING
10. OSHA HM/HW GENERAL SITE WORKER REFRESHER **Course Length:** 8 hours **Taught By:** NREA **Description:** This course provides personnel who work at HW generation sites with the refresher health and safety information they need to perform their duties safely and in compliance with 29 CFR 1910.120(e). The course also focuses on how to comply with RCRA HW generator requirements. This course covers the following concepts: • Safety • Hazard recognition • Toxicology • Air monitoring instruments • PPE • Physical hazards • Drum handling • Decontamination • Laws and regulations **Who Should Attend:** Individuals who have taken the initial training and package, handle, store, transport, and manage HM/HW, and who require annual refresher safety training
11. SAA REFRESHER **Course Length:** Varies. Dependent on waste stream(s) and questions from personnel, generally less than 30 minutes **Taught By:** NREA and/or HW Coordinators **Description:** Addresses accumulation, container selection, handling, and transportation procedures. See CETEP Training Document 9.1.5. **Who Should Attend:** All personnel who have received the initial training, require annual refresher training, and are responsible for satellite accumulation or any person who handles HW in those areas

INITIAL TRAINING
12. UW SITE REFRESHER **Course Length:** Varies. Dependent on waste stream(s) and questions from personnel, generally less than 30 minutes **Taught By:** NREA and/or HW Coordinators **Description:** Addresses accumulation of UW, container selection, handling, and transportation procedures. See CETEP Training Document 9.1.5. **Who Should Attend:** All personnel that accumulate UW and require annual refresher training
13. DOT HM/HW REFRESHER TRAINING **Course Length:** 8 hours **Taught By:** Commercial providers, such as ERC **Description:** This course provides training for DOT HM/HW transportation in compliance with 49 CFR 172 Subpart H. The course includes: • Regulatory changes that have occurred recently • Shipping goods • Classifying materials • Packaging, marking, labeling, and shipping • Manifests **Who Should Attend:** All personnel that transport HM/HW and require refresher training at least once every three years

INITIAL TRAINING

14. MCINCR-MCBQ IR PERMIT REVIEW

Course Length: 8 hours

Taught By: NREA Remediation Program Manager

Description: This course provides a refresher and review on all permits managed by the Remediation program of NREA including Russell Road Landfill. Topics include:

- Permits
- General facility conditions
- Post-closure care
- Detection and assessment monitoring
- Inspection schedule
- Compliance issues

Who Should Attend: Environmental engineers or anyone who manage permitted landfills.

15. LANDFILL REFRESHER TRAINING

Course Length: 3 hours

Taught By: NREA Compliance Section

Description: This course provides compliance with legal requirements training for personnel who work at the Russell Road Landfill. Topics include:

- Landfill laws and regulations
- Groundwater monitoring
- Gas management program
- Landfill Inspection and maintenance requirements
- Health/environmental effects and personal safety
- Emergency response procedures

Who Should Attend: NREA HW staff, Facility Maintenance Shop personnel who maintain landfill, Rhea contractors

INITIAL TRAINING
16. RCRA HW GENERATOR (Online When Time Frames Cannot Be Met Due to Scheduling Conflicts with CECOS/NREA) **Course Length:** 3 hours **Taught By:** National Environmental Training **Description:** This course is intended for individuals who deal with or manage HW. Topics include: • Definition of a HW • Labeling requirements • Storage areas • Disposal facilities • HW determination **Who Should Attend:** Personnel who generate, package, handle, store, transport, or manage HM/HW in the performance of their duties
OTJ TRAINING
17. OTJ TRAINING **Description:** OTJ Training for newly hired employees who will be handling and storing HM/HW can replace required refresher courses if the OTJ training teaches them to perform their duties in a way that will ensure the facilities compliance with the requirements as per 40 CFR 262.17(a)(7). The employee must receive an official certification from NREA stating that he/she has been involved in the HM/HW handling activities listed below, sufficient to waive his/her attendance to an annual refresher course and still maintain his/her certification for "HM/HW Handling." Topics include: • Training others in HM/HW handling • Researching and testing HM/HW for their toxic characteristics • Developing waste profiles • Studying HW characteristics and compatibilities • Preparation for EPA and VDEQ annual HW (RCRA) inspections • Participation in EPA and VDEQ annual HW (RCRA) inspections • Preparation of HW manifests • Overseeing MCINCR-MCBQ's NREA HW Storage Facility - Building 27401 and accepting, labeling, identifying, testing, and/or preparing waste for shipment to a disposal or recycling facility • Emergency responses and spill training/exercises

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Appendix E

ESOPs - Inspection Checklists

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	MCINCR-MCBQ **NREA** **Monthly HW Compliance Inspection Checklist**	References: • MCO 5020.2 Vol. 9, Chapter 3 • RCRA: 40 CFR • OSHA: 29 CFR • DOT: 49 CFR

Unit:	Inspected by:
Unit POC:	Date:
Phone No.:	Site Rep:
☐ COMPLIANT ☐ NONCOMPLIANT	

SAA Requirements [40 CFR 262.15]:

1. ☐ Waste is stored at or near any point of generation and under the control of the operator of the process.
2. ☐ Site is property labeled "SATELLITE ACCUMULATION AREA" with site contact name and number.
3. ☐ Waste is stored in quantities not to exceed 55 gallons (1 quart for acutely HW).
4. ☐ Excess waste moved to less than 90-day accumulation area within 3 days of ASD.
5. ☐ All containers labeled with "HAZARDOUS WASTE," an indication of the hazards of the contents, (or "WASTE PENDING ANALYSIS"), and DOT label. Labels are legible and facing forward.
6. ☐ Waste is stored in containers in good condition; free of leaks, dents, and deterioration; and compatible with the waste stored.
7. ☐ Waste containers remain closed, except when adding or removing waste. All drum bungs/caps, rings, bucket tops properly secured/tightened.
8. ☐ No signs of spills on the container(s) or in the surrounding area.
9. ☐ Adequate aisle space present between containers.
10. ☐ Clearly visible "NO SMOKING" signs and fire extinguisher(s).
11. ☐ Contingency plan including evacuation map, quick reference guide, and points of contact posted and visible.

UW Requirements [40 CFR 273.33 and 273.34]:

1. ☐ UW container is properly labeled with purple label, UW type, ASD, and DOT label. Labels are legible and facing forward.
2. ☐ Site is properly labeled as "UNIVERSAL WASTE AREA."
3. ☐ UW is properly packaged and no evidence of leakage.
4. ☐ UW accumulates less than one year from date generated/ASD.
5. ☐ Batteries (lead-acid, lithium, mercury, silver-ion, and nickel-cadmium): All cases intact; terminals taped; marked "UNIVERSAL WASTE – [TYPE OF BATTERY] BATTERIES," ASD.
6. ☐ Pesticides: Waste is in NREA-approved containers, properly labeled, closed, and compatible.
7. ☐ Lamps: Stored in approved container, properly labeled, closed, and secured.
8. ☐ Mercury-containing equipment: Stored in approved container, properly labeled, closed, and secured.

	MCINCR-MCBQ **NREA** **Monthly HW Compliance Inspection Checklist**	References: • MCO 5020.2 Vol. 9, Chapter 3 • RCRA: 40 CFR • OSHA: 29 CFR • DOT: 49 CFR

Miscellaneous:

Aerosol Cans

1. ☐ Punctured and drained utilizing an authorized aerosol can puncture unit.
2. ☐ Manage aerosol cans as HW.

Used Oil [40 CFR 279]

1. ☐ Is used oil container properly label with white recycling label, marked "USED OIL" under contents, and ASD.
2. ☐ Containers kept closed. All drum bungs/caps, rings, bucket tops properly secured/tightened.

Used Oil Filters

1. ☐ Punctured and "Hot Drained." Once filters are drained place in the used oil filter container. label container "USED OIL FILTERS," ASD.
2. ☐ Containers kept closed. All drum bungs/caps, rings, bucket tops properly secured/tightened.

Used Antifreeze

1. ☐ Label "GLYCOL-BASED ANTIFREEZE," ASD.
2. ☐ Containers kept closed. All drum bungs/caps, rings, bucket tops properly secured/tightened.

Uncontaminated Gasoline, MOGAS, Diesel, and F-24 Fuel (do not mix with any other fuel)

1. ☐ Label "[FUEL TYPE] FUEL FOR RECYCLE," ASD, adhere DOT Class 3 diamond.
2. ☐ Containers kept closed. All drum bungs/caps, rings, bucket tops properly secured/tightened.

Non-HW

1. ☐ Adhere "NON-HAZARDOUS WASTE" label, write the type of waste under contents, ASD.
2. ☐ Containers kept closed. All drum bungs/caps, rings, bucket tops properly secured/tightened.

Segregation of HM/HW

1. ☐ HW and HM are clearly segregated.

	MCINCR-MCBQ **NREA** **Monthly HW Compliance Inspection Checklist**	References: • MCO 5020.2 Vol. 9, Chapter 3 • RCRA: 40 CFR • OSHA: 29 CFR • DOT: 49 CFR

Central Accumulation Area (Less Than 90-Day) Requirements [262.17, 262.250-265]:

1. ☐ Weekly site inspections are conducted.
2. ☐ Site is property labeled as a "Less Than 90-Day Accumulation Area."
3. ☐ Waste from Unit-level Central Accumulation Area (Less Than 90-Day Accumulation Area) is moved within 10 days of the ASD to the NREA HW Storage Facility – Building 27401).
4. ☐ All labels marked with ASD.
5. ☐ All containers labeled with "HAZARDOUS WASTE," an indication of the hazards of the contents, and DOT label. Labels are legible and facing forward.
6. ☐ Drums/containers are shipped within the LQG 90-day timeframe.
7. ☐ Containers are NREA-approved, in good condition, and compatible with waste being stored.
8. ☐ Incompatible wastes or incompatible wastes and materials are not placed in the same container.
9. ☐ Waste containers kept closed. All drum bungs/caps, rings, bucket tops properly secured/tightened.
10. ☐ Containers managed in a manner to prevent rupture or leakage.
11. ☐ No signs of spills in the surrounding area.
12. ☐ Secondary containment is clean, free of cracks or other failures, and empty of free-standing liquid.
13. ☐ Unit HW Contingency Plan is on file with NREA HW Program Manager and Environmental Management System Coordinator.
14. ☐ Maps are posted of all emergency equipment locations, including fire control, spill equipment, decontamination equipment, evacuation routes, and site locations.
15. ☐ All inspection results are kept on file for three years.
16. ☐ Training records for current HW personnel kept on file until facility closure for former HW personnel for 3 years.
17. ☐ All personnel completed required training within 6 months of joining the activity. Untrained personnel perform HW management tasks only with trained supervision.
18. ☐ Fire control, spill control, eyewash / shower station is available, adequate and working properly.
19. ☐ Clearly visible "NO SMOKING" signs and fire extinguishers in place.
20. ☐ Adequate aisle spacing allowing for unobstructed movement of personnel, emergency equipment, spill control equipment and decontamination equipment.
21. ☐ Facility communications available or access to communications or alarm system (voice, signal, or cell phone).

	MCINCR-MCBQ **NREA** **Monthly HW Compliance Inspection Checklist**	References: • MCO 5020.2 Vol. 9, Chapter 3 • RCRA: 40 CFR • OSHA: 29 CFR • DOT: 49 CFR

Hazardous Waste Pharmaceuticals (Medical Storage Areas) Requirements [40 CFR 266 Subpart P]:

1. ☐ Site is property labeled "MEDICAL STORAGE AREA" with site contact name and number.
2. ☐ Waste is stored in containers in good condition; free of leaks, dents, and deterioration; and compatible with the waste stored.
3. ☐ Ignitable or reactive wastes managed safely.
4. ☐ Incompatible wastes or incompatible wastes and materials are not placed in the same container.
5. ☐ Waste containers remain closed and secured to prevent unauthorized access to contents.
6. ☐ All containers labeled with HW label, "HAZARDOUS WASTE PHARMACEUTICALS," and DOT label provided by NREA. Labels are legible and facing forward.
7. ☐ All labels marked with ASD.
8. ☐ Inventory system maintained.
9. ☐ Waste moved to less than 90-day accumulation area within 9 months of ASD.
10. ☐ No signs of spills on the container(s) or in the surrounding area.
11. ☐ Clearly visible "NO SMOKING" signs and fire extinguisher(s).

Environmental Management System (All Sites):

1. ☐ Was the person(s) interviewed able to define the acronym "EMS" correctly?
2. ☐ Was the person interviewed able to define the term Environmental Significant Aspect as it would apply to the processes performed at this command?
3. ☐ Was the person interviewed able to identify what adverse effect to the environment could take place if the identified significant aspect(s) at this command were not managed correctly?
4. ☐ Did the person interviewed know where the Commanding Officer's Environmental Policy was posted and what it states?
5. ☐ Did the person interviewed know who to call in the event of a spill and how to fill out a spill report?
6. ☐ Was all required training for the person(s) interviewed up to date and properly filed?

   ☐ All personnel have had Environmental Management System awareness training?

Comments/Names of Person(s) Interviewed:

MCINCR- MCBQ Satellite Accumulation Area and Medical Storage Area
Weekly Inspection Checklist

1. **File this inspection in your Environmental Operations or Records Binder and retain for 3 years.**
2. **Call NREA HW Program for pick-up when containers are almost full at (703) 432-0527.**

Month /Year:	Unit:
Inspector's Name:	Signature:

Inspection Items:	**Week Inspected**				
Answer all questions with Yes, No, or N/A	**1**	**2**	**3**	**4**	**5**
Inspection Date:					
1. Waste stored at or near the point of generation?					
2. All spills or leaks on drums or around the area quickly and thoroughly addressed?					
3. Does the SAA contain **LESS than** 55 gallons of HW or 1 quart of acutely HW?					
4. Liquid HW containers stored on clean, dry secondary containment with proper capacity?					
5. Containers in good condition and free from severe rusting, bulging, or structural defects?					
6. Containers compatible with waste being stored?					
7. Incompatible wastes not stored in the same container or containment?					
8. All drum bungs and self-closing lids serviceable?					
9. Containers securely closed except when adding or removing contents?					
10. Containers grounded when transferring flammable liquids?					
11. Containers marked as appropriate: "HAZARDOUS WASTE," "HAZARDOUS WASTE PHARMACEUTICALS," "NON-REGULATED WASTE," "UNIVERSAL WASTE," or "USED OIL"?					
12. HW labels visible, include Hazard Class labels (DOT), and facing forward?					
13. Is the following label information filled-out and legible? a. Generator name and address					
b. Accumulation state date (if Non-Regulated / UW / HW ready for pick-up)					
c. Contents, physical state, hazardous properties, UN Number (HW)					
14. Expired HM treated as a waste or shelf-life extended?					

Inspection Items:	**Week Inspected**				
Answer all questions with Yes, No, or N/A	**1**	**2**	**3**	**4**	**5**
Inspection Date:					
15. HM clearly separated from waste?					
16. Adequate aisle space between containers?					
17. Waste fluids stored only in authorized used oil tank or waste container?					
18. All battery terminals taped?					
19. Contingency plan including evacuation map, quick reference guide, and points of contact posted and visible (SAA only)					
20. All deficiencies identified during previous inspections corrected?					
REMARKS (continue on back of more space is needed):					

MCINCR-MCBQ Central Accumulation Area - Weekly Inspection Checklist

1. **File this inspection in your Environmental Operations or Records Binder; retain for 3 years.**
2. **Email a copy of your completed CAA Weekly Inspection Checklist to NREA by COB each Friday.**

Month /Year:	Unit:
Inspector's Name:	Signature:

Inspection Items:	**Week Inspected**				
Answer all questions with Yes, No, or N/A	**1**	**2**	**3**	**4**	**5**
Inspection Date:					
1. Containers properly labeled as "HAZARDOUS WASTE" and the date upon which each period of accumulation begins?					
2. Drums/containers **within** the LQG 90-day time limit?					
3. Containers in good condition; free from severe rusting, bulging, or structural defects; NREA-approved; and stored in a manner to prevent rupture and leaks?					
4. Containers compatible with waste being stored?					
5. Incompatible wastes stored in separate containers, containments, or bays?					
6. Containers kept closed? All drum bungs/caps and bucket tops properly secured and tightened? (NREA CAA: Are rings secured at proper torque?)					
7. HW labels visible and completed properly to include Hazard Class labels (DOT)?					
8. All battery terminals taped?					
9. "NO SMOKING" signs and fire extinguishers in place and clearly visible?					
10. Fire control, spill control, and eyewash equipment working properly and inspected?					
11. No signs of spills or leaks on the containers or in the surrounding areas? (Note: If **No**, must be addressed immediately.)					
12. Adequate aisle spacing allowing for unobstructed movement of personnel, emergency equipment, spill control equipment, and decontamination equipment?					
13. Secondary containment clean, serviceable, and empty of free-standing liquid?					
14. Maps posted of all emergency equipment locations including fire control, spill equipment, decontamination equipment, evacuation routes, and site locations?					

Inspection Items:	**Week Inspected**				
Answer all questions with Yes, No, or N/A	**1**	**2**	**3**	**4**	**5**
Inspection Date:					
15. Operating record up to date with items within storage? (NREA CAA: Updated daily on Sharedrive)					
16. All deficiencies identified during previous weekly inspection corrected?					
REMARKS (continue on back of more space is needed):					

APPENDIX F

Waste Stream Sheets

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HAZARDOUS WASTE STREAMS

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F-24 Contaminated Rags (Non-Metals Only)*

Note: This sheet is provided as guidance only based on typical operations. A complete laboratory analytical must be performed to determine all hazardous constituents of the waste to ensure proper management.

Contact NREA HW Program Manager at (703) 432-0527 with any questions.

Possible Contaminants of Concern

F-24 residual fuels

Characterization

This waste stream consists of any rags or wipes that came into contact with F-24 from spills, cleanup, or maintenance. These items must be managed as HW. No free liquids may be in containers.

Container Marking and Labeling

1) Obtain an open-top UN/NA-rated drum (metal or high-density polyethylene [HDPE]) from NREA for accumulation of solid F-24 debris waste. Immediately after material is placed into the drum, perform the following:
   1. Adhere the standard, yellow "HAZARDOUS WASTE" label to the outside of the drum.
   2. Circle or check the hazard "IGNITABLE."
   3. Write "D001" under Waste Codes.
   4. Write "UN3175, WASTE SOLIDS CONTAINING FLAMMABLE LIQUIDS, N.O.S 4.1, PG II (F-24-CONTAMINATED RAGS AND DEBRIS)" under Chemical Constituents.
   5. DO NOT add the date until the drum is full or ready to be turned in.
   6. Within 3 inches to either side of the label, place the DOT Class 4.1 diamond.
2) Confirm the drum is in the SAA. When adding waste to the drum, wear proper PPE listed on the SDS of the material originally used to create the associated waste stream. Immediately upon completion of adding waste material to the drum, ensure that the lid and bungs are closed and secured tightly.
3) When the drum becomes full or the process generating the waste is complete (whichever occurs first), mark the accumulation start date and call NREA at (703) 432-0527.

***Refer to current HW profile. See waste sheet for F-24 Contaminated Rags (metals) for rags contaminated with metals.**

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F-24 Contaminated Rags (Metals)†

Note: This sheet is provided as guidance only based on typical operations. A complete laboratory analytical must be performed to determine all hazardous constituents of the waste to ensure proper management.

Contact NREA HW Program Manager at (703) 432-0527 with any questions.

Possible Contaminants of Concern

F-24 residual fuels, heavy metals

Characterization

This waste stream consists of any rags, wipes, or solid debris that came into contact with F-24 from spills, cleanup, or maintenance and are contaminated with heavy metals of any type. These items must be managed as HW. No free liquids may be in containers.

Container Marking and Labeling

1) Obtain an open-top UN/NA-rated drum (metal or high-density polyethylene [HDPE]) from NREA for accumulation of solid F-24 debris waste. Immediately after material is placed into the drum, perform the following:
   a. Adhere the standard, yellow "HAZARDOUS WASTE" label to the outside of the drum.
   b. Circle or check the hazard "IGNITABLE." (Note: "TOXIC" may also be needed based on waste characterization).
   c. Write "D001" and the applicable heavy metal waste code(s) under Waste Codes. See Table F-1.
   d. Write "UN3175, WASTE SOLIDS CONTAINING FLAMMABLE LIQUIDS, N.O.S 4.1, PG II (F-24- CONTAMINATED RAGS AND DEBRIS)" and heavy metal type(s) under Chemical Constituents.
   e. DO NOT add the date until the drum is full or ready to be turned in.
   f. Within 3 inches to either side of the label, place the DOT Class 4.1 diamond and applicable heavy metal DOT Class diamond listed in Table F-1.
2) Confirm the drum is in the SAA. When adding waste to the drum, wear proper PPE listed on the SDS of the material originally used to create the associated waste stream. Immediately upon completion of adding waste material to the drum, ensure that the lid and bungs are closed and secured tightly.
3) When the drum becomes full or the process generating the waste is complete (whichever occurs first), mark the accumulation start date and call NREA at (703) 432-0527.

† Refer to current HW profile. Rags may be classified as Combustible Waste depending on the profile.

Table F-1: Heavy Metal HW Labeling Requirements

Metal	Waste Code	DOT Hazard Classification	DOT Diamond
Arsenic	D004	6.1	
Barium	D005	4.3	
Cadmium	D006	6.1	
Chromium	D007	4.1	
Lead	D008	N/A	N/A
Mercury	D009	8	
Selenium	D010	6.1	
Silver	D011	N/A	N/A

HW Paint-Contaminated Rags and Debris (Solid Only)

Note: This sheet is provided as guidance only based on typical operations. A complete laboratory analytical must be performed to determine all hazardous constituents of the waste to ensure proper management.

Contact NREA HW Program Manager at (703) 432-0527 with any questions.

Possible Contaminants of Concern

Various paints, solvents, and possible heavy metal contaminants from the painting process or original paint product.

Characterization

This waste stream consists of rags, wipes, barrier paper, tarps, masking tape, booth filters, gloves, stir sticks, mixing implements, sandpaper, and paint chips or dust that has come in contact with a flammable paint or solvents during painting activities. These items may be flammable based on usage. MCINCR-MCBQ manages all HW paint-contaminated rags and debris as HW. No free liquids may be in containers.

Container Marking and Labeling

1) Obtain an open-top UN/NA-rated drum (metal or HDPE) from NREA for accumulation of solid paint-contaminated rags and debris waste. Immediately after material is placed into the drum, perform the following: perform the following:
   a. Adhere the standard, yellow "HAZARDOUS WASTE" label to the outside of the drum.
   b. Circle or check the hazard "IGNITABLE."
   c. Write "D001" under Waste Codes.
   d. Write "UN3175, WASTE SOLIDS CONTAINING FLAMMABLE LIQUIDS, N.O.S 4.1, PG II (SOLID PAINT- CONTAMINATED RAGS AND DEBRIS WASTE)" under Chemical Constituents.
   e. DO NOT add the date until the drum is full or ready to be turned in.
   f. Within 3 inches to either side of the label, place the DOT Class 4.1 diamond.
2) Confirm the drum is in the SAA. When adding waste to the drum, wear proper PPE listed on the SDS of the material originally used to create the associated waste stream. Immediately upon completion of adding waste material to the drum, ensure that the lid and bungs are closed and secured tightly.
3) When the drum becomes full or the process generating the waste is complete (whichever occurs first), mark the accumulation start date and call NREA at (703) 432-0527.

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Solvent-Contaminated Wipes (Rags)

Note: This sheet is provided as guidance only based on typical operations. A complete laboratory analytical must be performed to determine all hazardous constituents of the waste to ensure proper management.

Contact NREA HW Program Manager at (703) 432-0527 with any questions.

Possible Contaminants of Concern

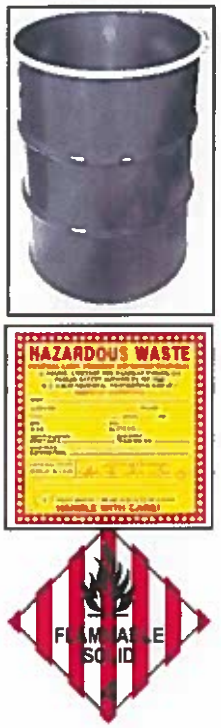
Various solvents, and possible heavy metal contaminants from the cleaning processes from Crystal Clean Solvent

Characterization

This waste stream consists of rags, wipes, gloves, items coming in contact with solvents during cleaning activities. These items may be flammable based on usage. MCINCR-MCBQ manages all solvent-contaminated rags and debris as HW. No free liquids may be in containers.

Container Marking and Labeling

1) Obtain an open-top UN/NA-rated drum (metal or HDPE) from NREA for accumulation of solid paint-contaminated rags and debris waste. Immediately after material is placed into the drum, perform the following: perform the following:
   a. Adhere the standard, yellow "HAZARDOUS WASTE" label to the outside of the drum.
   b. Circle or check the hazard "IGNITABLE."
   c. Write "D001", "D010", "F001" under Waste Codes.
   d. Write "UN3175, WASTE SOLIDS CONTAINING FLAMMABLE LIQUIDS, N.O.S 4.1, PG II (SOLID PAINT- CONTAMINATED RAGS AND DEBRIS WASTE)" under Chemical Constituents.
   e. DO NOT add the date until the drum is full or ready to be turned in.
   f. Within 3 inches to either side of the label, place the DOT Class 4.1 diamond.
2) Confirm the drum is in the SAA. When adding waste to the drum, wear proper PPE listed on the SDS of the material originally used to create the associated waste stream. Immediately upon completion of adding waste material to the drum, ensure that the lid and bungs are closed and secured tightly.
3) When the drum becomes full or the process generating the waste is complete (whichever occurs first), mark the accumulation start date and call NREA at (703) 432-0527.



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Aerosol Cans (Expired or Empty)

Contact NREA HW Program Manager at (703) 432-0527 with any questions.

Possible Contaminants of Concern

Aerosol cans that CAN NOT be punctured include such items as foam filler, adhesive spray, cleaning agents which contain corrosive constituents, and pesticides. It is the generator's responsibility to read the SDS and be familiar with the contents of the aerosol.

Characterization

This waste stream consists of any non-punctured aerosol cans, regardless of content volume. Aerosol cans with material in them that cannot be punctured must be managed as HW.

Container Marking and Labeling

1) Obtain an open-top UN/NA-rated drum (metal or HDPE) or a 5-gallon open-top plastic pail from NREA for accumulation or aerosol cans. When placing non-punctured cans into the container, ensure that the can is capped, or the spray nozzle is removed. Ensure that no can exceeds 1- liter capacity. Immediately after material is placed into the drum or pail, perform the following:
   a. Adhere a standard "HAZARDOUS WASTE" label to the outside of the drum or pail.
   b. Circle or check the hazard "IGNITABLE."
   c. Write "D001, D035" under Waste Codes
   d. Write "UN1950 WASTE, AEROSOLS, 2.1" under Chemical Constituents and write two or more of the ignitable propellants listed in SDS. Examples include butane, methyl ethyl ketone, ethylbenzene, propane, acetone, toluene, xylene, or oil-based paints.
   e. DO NOT add the date until the drum is full or ready to be turned in.
   f. Within 3 inches to either side of the label, place the DOT Class 2.1 diamond.

2) For pesticide aerosols, note the chemical constituents on the label.
3) For corrosive aerosols, note the chemical constituents on the label, add the "D002" waste code, circle the "CORROSIVE" hazard, and adhere the DOT Class 8 diamond as well.
4) Confirm the drum or pail is in the SAA. When adding waste to the drum, wear proper PPE listed on the SDS of the material originally used to create the associated waste stream. Immediately upon completion of adding waste material to the drum or pail, ensure that the lid and bungs are closed and secured tightly.
5) When the drum or pail becomes full or the process generating the waste is complete (whichever occurs first), mark the accumulation start date and call NREA at (703) 432-0527.

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Flammable Paint

Contact NREA HW Program Manager at (703) 432-0527 with any questions.

Possible Contaminants of Concern

Paint may be solvent-based and include organic solvents such as toluene, xylene, propane, methyl ethyl ketone, ethyl and methyl benzene, isobutyl isobutyrate, acetone, and alcohols. Refer to SDS for specific hazards.

Characterization

This waste stream consists of any liquid solvent-based material and oil-based paints. These liquid paints and solvents must be managed as HW.

Container Marking and Labeling

1) Obtain closed-top UN/NA-rated drum (metal), perform the following:
   a. Adhere the standard, yellow "HAZARDOUS WASTE" label to the outside of the drum
   b. Circle or check the hazard "ignitable."
   c. Write "D001, D035, possible "F001-3" under Waste Codes.
   d. Write "UN1263 WASTE PAINT, 3, II" under Chemical Constituents and write two or more of the ignitable propellants listed in SDS. Examples include butane, methyl ethyl ketone, ethylbenzene, propane, acetone, toluene, xylene, or oil-based paints.
   e. DO NOT add the date until the drum is full or ready to be turned in.
   f. Within 3 inches to either side of the label, place the DOT Class 3 diamond.
2) Confirm the drum is in the SAA. When adding waste to the drum, wear proper PPE listed on the SDS of the material originally used to create the associated waste stream. If a respirator is required per the SDS, only personnel enrolled in an approved respiratory protection program may perform the task. Immediately upon completion of adding waste material to the drum, ensure that the lid of the is closed and locked, if applicable.
3) When the drum becomes full or the process generating the waste is complete (whichever occurs first), mark the accumulation start date and call NREA at (703) 432-0527.

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Armory Debris Waste

Note: This sheet is provided as guidance only based on typical operations. A complete laboratory analytical must be performed to determine all hazardous constituents of the waste to ensure proper management.

Contact NREA HW Program Manager at (703) 432-0527 with any questions.

Possible Contaminants of Concern

Lead, carbon dust, contaminants of possible concern (CPC) dry residue

Characterization

This waste stream consists of armory debris waste and includes wipes, rags, cotton swaps, or other materials used to clean weaponry that would have come into contact with CPC, carbon, and residue from standard weapon cleaning processes. No free liquids may be in containers.

Container Marking and Labeling

1) Obtain an open-top UN/NA-rated drum (metal or HDPE) from NREA for accumulation of armory debris. Immediately after material is placed into the drum, perform the following: perform the following:
   a. Adhere the standard, yellow "HAZARDOUS WASTE" label to the outside of the drum.
   b. Circle or check the hazard "TOXIC."
   c. Write "D008" under Waste Codes
   d. Write "UN3077, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S, 9, III (LEAD-CONTAMINATED DEBRIS)" under Chemical Constituents.
   e. DO NOT add the date until the drum is full or ready to be turned in.
   f. Within 3 inches to either side of the label, place the DOT Class 9 diamond.

2) Confirm the drum is in the SAA. When adding waste to the drum, wear proper PPE listed on the SDS of the material originally used to create the associated waste stream as well as PPE listed in the weaponry cleaning SOP. Immediately upon completion of adding waste material to the drum, ensure that the lid and bungs are closed and secured tightly.

3) When the drum becomes full or the process generating the waste is complete (whichever occurs first), mark the accumulation start date and call NREA at (703) 432-0527.

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Broken Mercury Bulb Waste

Contact NREA HW Program Manager at (703) 432-0527 with any questions.

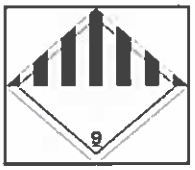
Possible Contaminants of Concern

Mercury

Characterization

This waste stream consists of all materials associated with the cleanup of broken fluorescent bulbs containing mercury including broken glass, dust, dirt, cardboard, and debris.

Container Marking and Labeling



1) Obtain an open-top UN/NA-rated HDPE pail from NREA for accumulation of broken mercury bulb waste. Immediately after material is placed into the container, perform the following:
   a. Adhere the standard, yellow "HAZARDOUS WASTE" label to the outside of the container.
   b. Circle or check the hazard "TOXIC."
   c. Write "D009" under Waste Codes.
   d. Write "UN3077, WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S, 9, III (MERCURY)-CONTAMINATED DEBRIS" under Chemical Constituents.
   e. Within 3 inches to either side of the label, place the DOT Class 9 diamond.
2) Confirm the container is in the SAA. When adding waste to the container, wear proper PPE listed in the broken fluorescent bulb SOP. Immediately upon completion of adding waste material to the container, ensure that the lid is closed and secured tightly.
3) When the container becomes full or the process generating the waste is complete (whichever occurs first), mark the accumulation start date and call NREA at (703) 432-0527.

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Gasoline and/or Diesel-Contaminated Rags (Solid Only)

Note: This sheet is provided as guidance only based on typical operations. A complete laboratory analytical must be performed to determine all hazardous constituents of the waste to ensure proper management.

Contact NREA HW Program Manager at (703) 432-0527 with any questions.

Possible Contaminants of Concern

Gasoline, MOGAS, or diesel residual fuels.

Characterization

This waste stream consists of any rags, wipes, or solid debris that came into contact with gasoline or diesel from spills, cleanup, or maintenance. These items must be managed as HW. No free liquids may be in containers.

Container Marking and Labeling

1) Obtain an open-top UN/NA-rated drum (metal) from NREA for accumulation of gasoline or diesel solid debris waste. Immediately after material is placed into the drum, perform the following:
   a. Adhere the standard, yellow "HAZARDOUS WASTE" label to the outside of the drum.
   b. Circle or check the hazard "IGNITABLE."
   c. Write "D001, D018" under Waste Codes.
   d. Write "UN3175, WASTE SOLIDS CONTAINING FLAMMABLE LIQUIDS, N.O.S 4.1, PG II (GASOLINE AND DIESEL DEBRIS)" under Chemical Constituents.
   e. DO NOT complete the date until the drum is full, or ready to be turned in.
   f. Within 3 inches to either side of the label, place the DOT Class 4.1 diamond.

2) Confirm the drum is in the SAA. When adding waste to the drum, wear proper PPE listed on the SDS of the material originally used to create the associated waste stream. Immediately upon completion of adding waste material to the drum, ensure that the lid and bungs are closed and secured tightly
3) When the drum becomes full or the process generating the waste is complete (whichever occurs first), mark the accumulation start date and call NREA at (703) 432-0527.

Hazardous Waste Pharmaceuticals‡

Contact NREA HW Program Manager at (703) 432-0527 with any questions.

Possible Contaminants of Concern

"Dropped" or otherwise unusable pills and medications from pharmacies that are not potentially credible under the pharmaceutical return program are managed as HW pharmaceuticals. These are referred to as "non-creditable HW pharmaceuticals."

Characterization

This waste stream consists of pills and medications that meet characteristic hazardous waste definitions or are listed as HW under RCRA regulations must be managed as HW. MCINCR-MCB manages all non-creditable pharmaceuticals as HW, regardless of whether the waste meets the definition of a HW pharmaceutical under RCRA. Common examples include Epinephrine (excluding salts), Warfarin >.03%, Nitroglycerin (in unfinished dosages), Physostigmine salicylate, arsenic trioxide, physostigmine, Dichlorodifluoromethane, Hexachlorophene, Lindane, Paraldehyde (CIV), Reserpine, Resorcinol, and Saccharin. This also includes common chemotherapy agents such as Melphalan, Daunomycin, Cyclophosphamide, Chlorambucil, Mitomycin C, and Streptozotocin. Note: Nicotine and Epinephrine salts are NOT considered HW pharmaceuticals.

Container Marking and Labeling

1) Obtain an open-top UN/NA-rated pail or other approved container from NREA for accumulation of HW pharmaceuticals. Immediately after the first waste is placed into the container, perform the following:
   a. Contact NREA for "Hazardous Waste Pharmaceuticals" label.
   b. Write the accumulation start date
   c. Check the applicable boxes.
   d. Keep an inventory of waste added.
   e. Contact NREA for appropriate DOT diamond and place within 3 inches to either side of the label.
2) Confirm the container is in the MSA. When adding waste to the container, wear proper PPE listed on the SDS of the material originally used to create the associated waste stream. Immediately upon completion of adding waste material to the container, ensure that the lid is closed and secured tightly.
3) Every 9 months, when the container becomes full, or the total accumulation exceeds volume/weight requirements (whichever occurs first) call NREA at (703) 432-0527.

An additional best management practice is to post quick reference HW pharmaceuticals, including lists of common HW pharmaceuticals, color coding, or other displays to alert personnel to the difference between pails for incompatible materials and other HWs.

‡ Does not apply to controlled substances, regulated medical waste, or used dental amalgam.

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Incompatible Pharmaceutical Waste[§]

Contact NREA HW Program Manager at (703) 432-0527 with any questions.

Possible Contaminants of Concern

"Dropped" or otherwise unusable pills and medications from pharmacies with properties that make them incompatible for storing with other materials for disposal (Table F-2) that are and not potentially credible under the pharmaceutical return program, must be managed as HW pharmaceuticals and stored separately from other HW pharmaceuticals.

Characterization

This waste stream consists of pills and medications that are incompatible with other wastes. See Table F-2 for examples of common incompatible pharmaceutical wastes.

Container Marking and Labeling

1) Obtain an open-top UN/NA-rated pail or other approved container from NREA for accumulation of HW pharmaceuticals. Immediately after the first waste is placed into the container, perform the following:
   a. Contact NREA for "Hazardous Waste Pharmaceuticals" label.
   b. Write the accumulation start date.
   c. Check the applicable boxes.
   d. Keep an inventory of waste added.
   e. Contact NREA for appropriate DOT diamond and place within 3 inches to either side of the label.
2) Confirm the container is in the MSA. When adding waste to the container, wear proper PPE listed on the SDS of the material originally used to create the associated waste stream. Immediately upon completion of adding waste material to the container, ensure that the lid is closed and secured tightly.
3) Every 9 months, when the container becomes full, or the total accumulation exceeds volume/weight requirements (whichever occurs first) call NREA at (703) 432-0527.

An additional best management practice is to post quick reference HW pharmaceuticals, including lists of common HW pharmaceuticals, color coding, or other displays to alert personnel to the difference between pails for incompatible materials and other HWs.

[§] Does not apply to controlled substances, regulated medical waste, or used dental amalgam.