

DEPARTMENT OF THE NAVYCOMMANDER NAVY REGION SOUTHWEST

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IN REPLY REFER TO: 5090 Ser N45/773 16 AUG 19

From: Commander, Navy Region Southwest

Subj: REGIONAL EXPLOSIVE HAZARDOUS WASTE MANAGEMENT PLAN

Ref:

- (a) Code of Federal Regulations (CFR), Title 40
- (b) DoDM 4715.26
- (c) California Code of Regulations (CCR), Title 22
- (d) Nevada Administrative Code (NAC), Sections 444.842-444.980
- (e) CFR, Title 49
- (f) CFR, Title 29
- (g) OPNAV M-5090.1
- (h) NAVSEA OP5
- (i) NOSSAINST 8023.11
- (j) NFESC User's Guide for Qualified Recycling Program(QRP),

UG-2039-ENV and Installation Procedures

- (k) DoD Instruction 4140.62
- (1) DoD Manual 4160.21
- (m) DoD Instruction 4160.28
- (n) DoD Manual 4160.28
- (o) OPNAVINST 8020.14

Encl: (1) Regional Explosive Hazardous Waste Management Plan (REHWMP)

- 1. <u>Purpose</u>. To establish policy, procedures, responsibilities, and guidelines for use by Commander, Navy Region Southwest (CNRSW) departments, tenant activities, and contractors during management, handling, accumulation (short-term storage), and turn-in of explosive hazardous waste (EHW). For non-explosive hazardous wastes, the requirements are identified in the Hazardous Waste Management Plan (CNRSW Metro Area or local plan) located at each Environmental Office.
- 2. <u>Cancellation</u>. CNRSW Regional Explosive Hazardous Waste Management Plan (REHWMP) of 09 Nov 17.

3. Background.

a. The Resource Conservation and Recovery Act (RCRA) of 1976 established a framework for national programs to achieve environmentally sound management for hazardous and non-hazardous wastes. Subtitle C of RCRA is specific to hazardous waste (HW) and is the basis for U.S. Environmental Protection Agency (EPA) regulations that define HW and how it must be managed. In 1992, the Federal Facility Compliance Act was signed into law and

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required the EPA, in consultation with Department of Defense (DoD) and the States, to publish regulations identifying when conventional and chemical military munitions become HW subject to Subtitle C of RCRA. The regulations, the Military Munitions Rule (MR) (40 CFR 260), define when military munitions become waste military munitions (WMM) and how these WMM will be managed. The MR became effective on 12 August 1997, and is codified in 40 CFR, reference (a).

- b. EHW includes hazardous waste class/division 1.1, 1.2, or 1.3 WMM and other munitions manufacturing, processing, or miscellaneous waste presenting an explosive hazard as outlined in reference (b). In essence, EHW is HW that has a "reactive" characteristic and must be managed as established in reference (b) and reference (h). Any conflicts between HW and EHW management requirements shall be referred to the Naval Ordnance Safety and Security Activity for resolution.
- c. Reference (b) provides DoD procedures necessary to determine when military munitions become EHW. Explosives and EHW accumulated/stored on or transported to/from naval shore activities are regulated by References (a) through (o) as applicable. Military munitions safety requirements, regardless of classification as EHW, are established in reference (h). Reference (i) delineates guidelines for writing Standard Operating Procedures.
- 4. <u>Scope</u>. This REHWMP is applicable to CNRSW departments, tenant, activities, and contractors who generate, handle, transport, or manage EHW, or perform any operation that has the potential to generate EHW.

5. Policy.

- a. All EHW shall be managed in accordance with this REHWMP.
- b. CNRSW departments, tenant activities, and contractors are not authorized to receive or treat EHW from geographically separated activities within or outside of CNRSW. Explosive Ordnance Detachment Mobile Unit 3 Det Southwest shall be contacted at (619) 545-0481 when emergency responses are necessary as requested by military or civilian law enforcement or emergency response authorities.
- c. The site operator at each CNRSW department, tenant activity, or contractor's site is considered the generator, as his or her act or process produces hazardous waste identified or listed in 40 CFR 261 or his or her act first causes a hazardous waste to become subject to regulation (40 CFR 260.10). As such, the generator is responsible to ensure that all EHW is managed according to this REHWMP.

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- 6. Action. CNRSW departments, tenant activities, and contractors will:
 - a. Conduct their operations in a manner that reduces or eliminates the generation of EHW.
 - b. Reuse, reclaim, or recycle material to the maximum extent possible.
 - c. Manage EHW according to applicable federal, state, local reporting requirements as well as Navy policy

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By direction

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SECTION 1: Applicable Regulations and Permits

Listed below are the primary regulations and permits that CNRSW and its activities, tenant commands, and contractors must comply with to legally operate.

1.1. Federal Laws and Regulations.

- 1. Resource Conservation and Recovery Act (RCRA). The law was enacted in 1976 and is codified in 40 CFR 146, 148, and 260 299. These Parts regulate facilities that manage and/or dispose of HW including EHW.
- 2. <u>Military Rule (MR) (62 FR 6621, February, 1997)</u>. The regulations became effective (under RCRA) 12 August 1997. These regulations define when military munitions become waste and how these WMM will be managed.

1.2. State Regulations.

- 1. CCR Title 22, Division 4.5. These regulations provide the requirements for HW management in California.
- 2. NAC, Sections 444.842 444.980. These regulations provide the requirements for HW management in Nevada.

1.3. Federal Permits.

A RCRA permit is required for HW Treatment, Storage, and Disposal Facilities (TSDFs). A RCRA permit application consists of two parts, Part A and Part B, with the exception of those exclusions specified in 40 CFR 270.1(c)(2).

1.4. State and Local Permits.

For states that have been delegated RCRA TSDF regulatory oversight authority, these states will issue the TSDF permit. Local municipal permits also may be required for generators who accumulate HW. Local permits are for storage of HW not to exceed 90 days.

1.5. Navy Directives, Instructions, and Plans.

- 1. <u>DoD Manual 4715.26, 25 April 17.</u> DoD Military Munitions Rule (MR) Implementation Procedures is Navy's policy to implement the EPA's MR. This procedure document interprets the requirements of the MR and establishes an overarching policy for the management of WMM that is consistent among DoD Components.
- 2. NAVSEA OP5, Volume 1, Seventh Revision. Ammunition and Explosives Ashore, Safety Regulations for Handling, Storing, Production, Renovation, and Shipping. The explosives safety policies of the Department of the Navy (DON) are directed at providing reliable ammunition and explosives in sufficient quantity to satisfy Navy and Marine Corps requirements in a safe manner. These policies emphasize safe and efficient operating procedures while: (1) Providing the maximum possible protection to personnel and

property from the damaging effects of potential accidents involving DON ammunition and explosives, (2) Limiting the exposure of a minimum number of persons, for a minimum time, to the minimum amount of ammunition and explosives consistent with safe and efficient operations. The purpose of this manual is to acquaint personnel with the characteristics and hazards of ammunition, explosives, and other related hazardous materials and to specify standardized safety regulations for all operations where ammunition and explosives are or are intended to be present.

- 3. OPNAV-M 5090.1. Environmental Readiness Program Manual. This manual contains the Navy's policy guidance for environmental readiness. It discusses requirements, delineates responsibilities, and issues policy guidance for the management of the environmental, natural, and cultural resources for all Navy ships and shore activities.
- 4. CNRSW Metro and Non-Metro Installation Hazardous Waste Management Plans. These plans establish policy for the HW management program at specific activities. Although EHW is a subset of HW, installations have the option of including the EHW management plan within their HW management plan, or issuing a separate EHW management plan. If issued separately, the installation HW management plan must include a reference to the EHW management plan.

SECTION 2: Definitions

The following definitions are used throughout this document:

2.1. Conditional Exemption (CE).

An exemption from the regulatory definition of HW; therefore, from compliance with specific environmental requirements pertaining to the storage and transport of HW. This exemption is conditional in that compliance with certain criteria and requirements set forth in references (a) and (b) must be met. CE may only be used in states that have adopted the CE regulations or in states that do not have more stringent regulations than federal standards.

2.2. Demilitarize.

According to NAVSEA OP5, demilitarized is the act of destroying the military offensive or defensive advantages inherent in certain types of equipment or material. The term includes mutilation, dumping at sea, cutting, crushing, scrapping, melting, burning or altering; designed to prevent the further use of this equipment and material for its originally intended military or lethal purpose. The term applies equally to material in unserviceable or serviceable condition, that has been screened through the Inventory Control Point (ICP) and declared surplus or foreign excess.

2.3. Designated Disposition Authority (DDA).

The DoD is responsible for providing munitions disposition instructions for excess, obsolete, unserviceable (for example, aged, deteriorated, or damaged), and waste ammunitions and explosives. Upon receipt of request for disposition instructions from the installation, the DDA will consider all legitimate use and beneficial reuse for the ammunition and explosives. The Navy has four DDAs, one each for large and small Navy missile systems, a third for cartridge/propellant actuated devices, and a fourth for ammunition.

2.4. EPA Hazardous Waste Code.

An EPA hazardous waste code should be written on the HW label for transportation to a treatment or disposal facility.

2.5. EPA Identification Number.

In order to legally generate, treat, store, dispose of, or transport HW, a facility must request and receive an EPA identification number. To inquire about your installations EPA number contact your installations environmental support team or the Region RCRA environmental representative.

2.6. Excess Material.

A material is excess if it is usable but no one in the DoD has a current or projected need for it.

2.7. Explosive-Contaminated Waste.

An explosive-contaminated waste is any inert material such as rags, paper, wood, plastic, soil, or metal contaminated with an explosive material. Contaminated waste that meets the characteristic of reactivity, as defined in reference (a), is managed and disposed of as EHW. Explosive contaminated waste that does not possess the characteristic of reactivity, as defined in Appendix A, is a combustible and explosive scrap AND defined below.

2.8. Explosive Hazardous Waste (EHW).

- 1. EHW includes hazard class/division 1.1, 1.2, or 1.3 WMM and other munitions manufacturing, processing, or miscellaneous wastes presenting an explosive hazard as outlined in 40 CFR 261.23 for characteristics of reactivity.
 - a. Military Munitions become waste when:
 - (1) Abandoned by being disposed of, incinerated, or treated prior to disposal.
 - (2) Removed from a military magazine or other storage area for the purpose of treatment or disposal as directed by the appropriate DDA.
 - (3) Determined by a DDA to be damaged or deteriorated to the point they cannot be put into serviceable condition or cannot be reasonably used for some other purpose. An example would be when a Notice of Ammunition Reclassification (NAR) or similar document that requires treatment within a specified period.
 - (4) Declared a waste by an AMO.
 - (5) Used or fired munitions that are transported off-range, buried, or land filled.
 - (6) Munitions that land off-range, if they are not promptly rendered safe and/or retrieved.
 - (7) Munitions that are deteriorated or damaged to the point that they cannot be put into serviceable condition and cannot reasonably be recycled or used for other purposes.
 - b. Non-military munitions or other explosives become waste when:
 - (1) Discarded or considered inherently waste-like.
 - (2) Disposed of, burned, or incinerated.
 - (3) Accumulated, stored, or treated before or in lieu of being disposed of, burned, or incinerated.
 - (4) Used in a manner constituting disposal.
 - (5) The item poses a threat to human health or the environment, is inadequately labeled

or packaged, and is not repackaged within 96 hours or relabeled within 10 days (California requirement in CCR Title 22, 66261.2).

(6) Any other applicable federal, state, or local definition of HW is met.

2.9. Explosives or Munitions Emergency Response.

To the extent possible, the DoD Components will provide EOD personnel in support of an explosives or munitions emergency when military authorities request such support. To the extent practicable and when it does not interfere with military duties, the DoD Components may provide EOD personnel in support of an explosives or munitions emergency when requested by authorized officials (e.g., civilian law enforcement, emergency response authorities) and in accordance with DoDI 3025.21. The MR exempts explosives or munitions emergency response specialists (e.g., EOD personnel) from full compliance with RCRA generator, transporter, and permitting requirements during an explosives or munitions emergency response. See reference (b), paragraph 3.9. for information about emergency responses.

2.10. Explosives or Munitions Emergency Response Specialist.

Individuals trained in conventional or chemical munitions or explosives handling, transportation, render-safe procedures, or destruction techniques. Explosives or munitions emergency response specialists include DoD emergency Explosive Ordnance Disposal (EOD) technicians, Technical Escort Unit (TEU) personnel, DoD-certified civilian or contractor personnel; and other federal, state, or local government, or civilian personnel similarly trained in explosives or munitions emergency responses.

2.11. Hazardous Waste (HW).

A waste is hazardous if it meets any one of the definitions in Appendix A.

2.12. Hazardous Waste Accumulation Site.

A site where properly packaged and labeled HW (i.e., EHW) may be accumulated without a permit prior to being shipped offsite for treatment or disposal. The two types of HW accumulation sites are a 90-day Accumulation Site and Satellite Accumulation Site. Note that HW and explosives safety regulations are applicable to both accumulation sites. When there is a conflict between these regulations, the more stringent requirement applies.

2.13. Hazardous Waste Generator.

A HW "generator" means any person whose act or process produces HW, or whose act first causes a HW to become subject to regulation.

2.14. Military Munitions.

- 1. Any item that meets all of the criteria below:
 - a. All ammunition products and components produced or used by or for the U.S. Department of Defense or the U.S. Armed Services for national defense and security,

including military munitions under the control of the Department of Defense, the U.S. Coast Guard, the U.S. Department of Energy, and National Guard personnel. The term military munitions includes: confined gaseous, liquid, and solid propellants, explosives, pyrotechnics, chemical and riot control agents, smokes, and incendiaries used by DOD components, including bulk explosives and chemical warfare agents, chemical munitions, rockets, guided and ballistic missiles, bombs, warheads, mortar rounds, artillery ammunition, small arms ammunition, grenades, mines, torpedoes, depth charges, cluster munitions and dispensers, demolition charges, and devices and components thereof:

- b. Produced or used by or for DoD or the U.S. Armed Services for national defense and security (including military munitions under the control of the DoD, the U.S. Coast Guard, the U.S. Department of Energy, and National Guard personnel); and
- c. The production or use of the item is for national defense and security.
- 2. The following are **excluded** from the definition of Military Munitions:
 - a. Wholly inert items, defined as those munitions or munitions components that are incapable of containing or have never contained energetics or chemical agents (e.g., unloaded projectile bodies, rotating bands, lifting plugs, bomb lugs). Once a munitions component is used in military munitions, it is no longer considered to be wholly inert.
 - b. Improvised explosive devices, defined as devices fabricated in an improvised manner that are designed to destroy, disfigure, distract, or harass and that consist of explosive, destructive, lethal, noxious, pyrotechnic, or incendiary chemicals. These non-standard devices may be made from military or non-military materials.
 - c. Nuclear weapons, nuclear devices, and nuclear components thereof.

Note: The MR makes no changes to existing environmental regulations regarding waste materials produced incidental to the manufacturing or testing of explosives.

- 3. Specific Application of the definition of Military Munitions to Manufacturing, Research, Development, Testing, & Evaluation (RDT&E), and Renovation. These processes sometimes result in certain items that fail to meet specifications (rejects) or in the generation of materials that are incidental to the process (residues). Only those rejects and residues that are defined as military munitions are subject to reference (b).
 - a. Rejects or Residues that **are** Military Munitions. A reject or residue from manufacture, RDT&E, or renovation activities is a military munition if it is an ammunition product or component produced for or used by or for DoD or Armed Services for national defense and security. As a general rule, these items are products of manufacturing, RDT&E, or renovation processes; or are undergoing quality, performance, and safety testing; and are managed within the DoD munitions accounting systems. For example, an explosive produced specifically for use in artillery ammunition that would be issued to the DoD Components would be a military munition even if the explosive did not meet production specifications. Likewise, complete ammunition items produced for use by DoD that do

not meet production specifications would be military munitions. If the reject or residue is a military munition, then it is subject to the MR and the waste evaluation process described herein.

b. Rejects or Residues that are **not** Military Munitions. Materials that are produced incidental to manufacturing, RDT&E, or renovation processes are not military munitions. For example, wastewater or sludge from the production of explosives would not be military munitions because their production was incidental to the production of the explosives and are not intended to be used for national security or defense. If the reject or residue is not a military munition, then it must be evaluated to determine if it is a solid waste under RCRA regulations for non-munitions wastes or under the analogous state regulations.

2.15. Combustible and Explosive Scrap.

Except for approved uses, combustible materials such as paper, oily rags, cotton waste, oakum, paints, solvents, volatile liquids, and painting cloths shall not be permitted in or near a PES. When required, these items shall be stored in authorized fireproof lockers or containers specifically designated and used for that purpose. Particular care shall be taken to avoid the presence of steel wool, glass wool, sand, gravel, or any other abrasive substances and debris on or near floors, tables, loading docks, landing platforms, or other working surfaces where explosives are handled. Waste materials like oily rags, combustible and explosives scrap, and paper shall be separated and placed in approved containers that are properly marked and preferably located outside the building or isolated from the immediate vicinity of the explosives operation. The waste containers shall be painted different colors and the name of the contents plainly marked on the exterior surface. All combustible and explosive scrap and waste shall be removed at least daily from operating buildings or areas and taken to isolated collection and/or disposal sites in accordance with the Standard Operating Procedure (SOP). Hazardous waste must be removed to a less than 90 day accumulation site or to a permitted storage facility. For Research, Development, Test and Evaluation (RDT&E) operations, explosive waste is generated when a determination is made by the generator to discard scrap material, without intent to reuse, recycle, recover or sell it. See reference (h) appendix G, paragraphs G-12.4.1 through G-12.4.5 for requirements involving waste resulting from RDT&E operations. Scrap shall not be left or stored in buildings or areas that are not occupied, but shall be removed to a treatment area before any building or area is vacated.

2.16. Treatment, Storage, and Disposal Facility (TSDF).

A TSDF is permitted under RCRA to treat, store or dispose of HW. The permit's specific conditions determine the HW types, quantities, and procedures at the TSDF.

2.17. Reclaim.

A material is reclaimed if it is processed to recover a usable product or is regenerated.

2.18. Recycle.

To employ a component of an end item as an ingredient or feedstock to produce a product, or to process an end-item to recover a usable product.

SECTION 3: General EHW Management Practices

The following chapter is general guidance for EHW generators. Several flow charts outlining the general concept of evaluating and managing WMM are included in Appendix B.

3.1. Management Liability.

If an item is considered an EHW and is not managed properly, the generator is liable for any and all legal actions (fines and/or imprisonment) taken against him or her.

It is a violation of federal and state law to accumulate EHW for longer or more than the time and the quantity specified at generator accumulation sites without a proper exemption or an extension granted by the state.

3.2. Unstable or Deteriorating, Excess or Unusable Munitions and the DDA Process.

- 1. <u>Unstable or Deteriorating Munitions</u>. Munitions with an unknown stabilizer, or a stabilizer that is deteriorating at an unacceptable rate, present an immediate safety hazard. When the munitions item manager or the Naval Operational Logistics Support Center (NOLSC) first becomes aware of unstable or deteriorating munitions, they will issue an urgent Notice of Ammunition Reclassification (NAR) under authority of the Navy DDA for ammunition. Upon receipt of a NAR, the activity storing the unstable or deteriorating munitions will:
 - a. Determine if the munitions identified in the urgent NAR are in their possession;
 - b. Follow the disposition instructions given in the NAR by the item manager or NOLSC. Urgent NARs direct the activity to execute disposition instructions (i.e., ship the EHW to either an on- or off-site TSDF within 60 days. After that time, the unstable or deteriorating munitions must be handled as an Explosives or Munitions Emergency Response; and
 - c. For an urgent NAR that identifies the unstable or deteriorating material as a hazardous waste, manage it as EHW.
- 2. Excess or Unusable Munitions. On occasion, an activity may identify munitions as excess to an activity's needs or, through inspection, be considered defective or unusable. Since activity munitions managers do **not** have authority to declare these munitions as EHW, managers must:
 - a. Report the excess or unusable munitions to the NOLSC and request disposition instructions;
 - b. Execute NOLSC disposition instructions to either:
 - (1) Ship the munitions within the designated timeframe to be reused at another DoD activity or to be recycled at a DoD or commercial facility. Munitions shipped under NOLSC disposition instructions are **not** EHW; or

- (2) Ship the munitions within the designated timeframe to a TSDF. Only when the munition is removed from storage for disposal or treatment does it become an EHW.
- (3) Whether the material is identified through NAR or local processes, unstable/suspect energetic material may be stored in the same magazine as serviceable munitions, but must be stored separately from all other materials. These materials may be stored with unstable/suspect materials only when the conditions in OP5 are met.

3.3. Designating EHW Locally.

In limited circumstances, local, qualified munitions handlers are authorized to classify a munition as an EHW. These involve MR provisions that define a munition as waste without a specific designation by a DDA and include:

- 1. An unused munition that is abandoned by being disposed of by burial; burned; detonated (the exception is when detonated as a consequence of intended use); incinerated; or treated prior to disposal.
- 2. An used military munition become WMM under any of the circumstances:
 - a. Transported off a range or from the site of use for the purposes of reclamation, treatment, disposal, or storage prior to or instead of reclamation, treatment, or disposal.
 - b. Recovered, collected, and then disposed of by burial, or landfill either on or off a range.
- 3. Ammunition that lands off range and is not promptly destroyed in place rendered safe or retrieved.

3.4. Identification of EHW Composition.

RCRA requires that the generator characterize EHW before it is placed in an accumulation site. When necessary, EOD should be contacted for assistance. Three methods for EHW characterization may be used: generator knowledge, publications, and analytical methods.

1. Generator Knowledge

- a. Known Composition. In almost all instances, the hazardous constituents and characteristics of EHW are known. Munitions in inventory are designated with a DoD Identification Code (DODIC) or Navy Ammunition Logistics Code (NALC). Local inventory managers and/or EOD detachments can use the DODIC and/or NALC to look up the filler constituents.RCRA requires that the generator characterize EHW before it is placed in an accumulation site. When necessary, EOD should be contacted for assistance. Three methods for EHW characterization may be used: generator knowledge, publications, and analytical methods.
- b. If identification is impossible via labeling, marking, DODIC/NALC, etc., two scenarios can occur depending on the visual appearance of the item.

- (1) The item appears unstable or decomposed (e.g., crystals have formed and its visual appearance offers no further assistance for its identification). The item will be handled and treated as a safety emergency by EOD.
- (2) The item appears stable and its visual appearance offers enough evidence for identification of the item that further handling can be allowed safely. Chemical and physical analysis to identify the item can be conducted as outlined below in this Section.

2. Publications.

- a. For standard munitions waste and laboratory waste of the military munitions type, the following publications may be used to identify its physical and chemical characteristics.
 - (1) The classified or unclassified <u>EOD 60-Series</u> publications include information on obsolete, classified, and foreign military munitions, and all standard munitions.
 - (2) <u>Demolition Materials and Properties</u> <u>NAVSEA SW060-AA-M-AA010</u> is used by Explosives Safety Offices, Naval Mobile Construction Battalion, Firing Officers, and EOD.

This unclassified document lists national stock numbers and DODICs and NALCs (if available) for each item.

- (3) <u>Transportation and Storage Data for Ammunition Explosives and Related Hazardous Materials NAVSEA SW020-AC-SAF-010</u>. This unclassified document includes 8,000 Navy items and lists national stock numbers, and DODICs and NALCs (if available).
- (4) <u>List of Explosives for Navy Munitions</u> <u>S</u>W010-AG-ORD-010. This document lists all explosives used in current Navy munitions.
- (5) <u>Munitions Items Disposition Action System (MIDAS)</u>. This is a web-based data source, developed by the Defense Ammunition Center, containing over 6,500 munitions items. MIDAS can be found at http://www.dac.army.mil/td/midas or at http://206.37.241.30/.

3. Analytical Methods.

- a. If a waste cannot be identified via generator knowledge or publications, the waste must be analyzed. Analysis will occur only when the stability of the waste does not threaten human safety. Analysis of waste is more applicable to laboratory waste streams, than for munitions items.
- b. Ideally, a representative sample of the waste is collected and analyzed by a state-certified laboratory. However, if the hazardous classification of the waste item cannot be determined because the identification of the item is unknown, then shipment of samples to an off-site certified laboratory is against DoD policy.

Depending on its origin, the waste can be analyzed by any of the following parameters and respective analytical methods.

3.5. Sampling and Analysis of Explosive Waste.

- 1. All environmental samples that are being analyzed to determine if the waste is an EHW will meet the following sampling and analysis requirements:
 - a. Individuals and/or laboratories involved in the sampling and analysis shall have the proper training, certification, technical knowledge, and experience to perform the testing. Records shall be maintained on the relevant qualifications, training, skills, and experience.
 - b. Testing shall be performed in accordance with a controlled written procedure.
 - c. Fill out the appropriate information on the sample tag, or field logbook for off-site testing, and chain of custody documents.
 - d. Analysis data shall be maintained in the laboratory and by the generator for each sample tested. Information must include identification of the procedure followed, signature and title, or equivalent of the person accepting responsibility for the content of the report, analysis findings, and any noted deviations or discrepancies.
 - e. Records shall be maintained on calibration status of the equipment used in the sampling or analysis testing.
 - f. Samples shall be taken according to the following procedures:
 - (1) For drums of liquid wastes, experienced Navy personnel will determine whether the drummed material is homogeneous or layered. If homogeneous, a small glass tube or pipette is used to sample the portion of the liquid nearest to the surface. If layered, a Coliwasa sampler shall be used to collect a sample from the entire liquid column.
 - (2) For a drum with no free liquids, the appropriate personnel assess the degree of homogeneity of the wastes. Stainless steel or sterile plastic spoons, spatulas, or a core sampler is used to collect grab samples from different portions of the drum, such that the composite sample represents the drum's contents.
 - (3) Care should be taken when obtaining samples to ensure the sample is representative of the total waste volume. If a reasonable degree of homogeneity cannot be assumed, multiple samples must be obtained, analyzed, and compared for uniformity.
 - (4) In addition, due caution should be taken in order to minimize direct exposure of sampling personnel to the waste being sampled. The general hazardous characteristics of the waste should be known prior to sampling to determine appropriate sampling safeguards.

(5) Potentially explosive samples to be analyzed by laboratories shall be stored separately from non-waste materials in the laboratories prior to the analysis. After being analyzed, any leftover explosive samples that are determined to be hazardous shall be stored and handled as EHW.

3.6. EHW Accumulation Site.

The two types of EHW accumulation sites are described below. Note that HW and explosives safety regulations are applicable to all accumulation sites. When there is a conflict between these regulations, the more stringent requirement applies.

- 1. <u>EHW 90-day Accumulation Site</u>. A site where any amount of EHW may be accumulated for up to 90 days is called an EHW 90-day Accumulation Site. This site must meet the following requirements:
 - a. Containers must be shipped for disposal within 90 days of the accumulation start date (i.e., the date EHW is first added to the container).
 - b. EHW must be stored in a manner that minimizes the possibility of a fire, explosion, or any unplanned release of waste to the environment. Secondary containment is recommended for liquid wastes not already in a secondary over- pack container. The foundation of the area should be impervious to spills or leaking EHW, constructed of concrete, plastic, or metal and be compatible with the EHW being stored, with all cracks or gaps repaired or sealed. Storm or floor drains adjacent to or drainage valves located within the area should be covered, closed or sealed to avoid any possible release of EHW into the storm drains, sewer system or surrounding environment. Also identify in the appropriate storm water/spill/business plan where these drains will discharge in the event there is a release.
 - c. There must be adequate aisle space (2 feet minimum) to allow for the unobstructed movement of personnel and emergency equipment.
 - d. Personnel managing an EHW 90-day site must conduct and document inspections of their facility at least weekly (See Appendix D).
- 2. <u>EHW Satellite Accumulation Site</u>. A site where up to 55 gallons of EHW may be accumulated for up to one year is called an EHW Satellite Accumulation Site. This site must meet the following requirements:
 - a. Containers may be used to accumulate waste for no more than one year prior to being transported off the installation for disposal.
 - b. Containers must be at or near the point where the waste is generated and under the control of the operator or supervisor of the process generating the waste.
 - c. When the 55-gallon quantity limitation has been reached, the waste must be moved to an EHW 90-day Accumulation Site or TSDF within three days.

- d. The total storage time limitation from the initial accumulation start date to the date the waste is transferred to a TSDF shall not exceed one year regardless of the volume in the container and regardless if it is ever moved to a EHW 90-day Accumulation Site.
- e. If a container is moved to an EHW 90-day Accumulation Site, that container must be relabeled and the new accumulation start date for that container is the date that the container reached its volume or storage limitation in the satellite area.
- 3. The following requirements are applicable to EHW 90-day and Satellite Accumulation Sites.
 - a. HW labels (also used for EHW) must be placed on containers or tanks as soon as the first drop of EHW is placed inside. Ensure each label section is properly and completely filled out with a water-resistant marker.
 - b. All containers and tanks must be closed unless waste is being added or removed. Ensure the containers have proper fitting and tightly secured lids, rings, or bungs.
 - c. Ignitable EHW must be contained in grounded containers, tanks, or metal pallets prior to conducting transfer operations.
 - d. Used empty containers greater than 5 gallons must be marked or labeled "empty" along with the date that the container became empty, and disposed of or recycled within one year of that date.
 - e. During consolidation or transfer operations ensure that the waste being consolidated or transferred is compatible with the container the waste will be consolidated or transferred into. Allow space for liquid expansion when temperatures rise and clean up any spills or puddles remaining on container tops or sides.

3.7. EHW Storage Options.

Activities that, due to extenuating circumstance, anticipate exceeding the time limits outlined above have the option of using the CE for munitions offered by references (a) and (b). This option is not available in California due to regulatory restrictions.

3.8. EHW/Hazardous Materials (HM) Segregation.

- 1. Whenever possible, EHW shall be accumulated separately from serviceable munitions.
- 1. EHW may be accumulated in the same building with serviceable munitions, except for situations described in Section 3.2.1, only if the following conditions are met:
 - a. Stable EHW, except for laboratory samples, may be stored in the same magazine with other serviceable munitions but must be segregated into a readily identifiable area within the magazine.
 - b. EHW and serviceable munitions stored in the same magazine must be compatible per

OP5.

- c. Liquid wastes and the non-waste materials must **not** share the same secondary containment unit. Secondary containment is recommended, but not required.
- d. All wastes at an accumulation site must be physically located together, taking OP5 compatibility requirements into consideration. Non-waste materials must **not** be scattered among the waste.

3.9. EHW Turn-in Procedures.

Prior to EHW generation as a product from laboratory and testing operations, it is the tenant activities responsibility to fund and set contract task to disposal of waste. Tenant activity will include turn-in contract procedures in their SOP and update when contract task changes. All EHW will be properly labeled, containerized and segregated. Contact the base Environmental Office to review SOP and disposal contract. Approved certified contractors will pick-up the EHW and transport it to a permitted treatment/disposal facility. Note that the transporter may affix a U.S. Department of Transportation label, which will identify the manifest number and proper shipping codes.

3.10. Demilitarizing Items.

- 1. Before military munitions can be released from military control, they must first be certified to be free of explosives and other hazardous materials and be demilitarized in accordance with references (l), (m) and (n). Demilitarization serves four purposes:
 - a. For cased munitions, demilitarization vents or opens the casing to confirm the munitions item contains no explosive filler;
 - b. It renders it incapable of being used for its original, military purpose;
 - c. It removes some the military characteristics of the item; and
 - d. It allows it to be released to the general public.
- 2. Demilitarization is a common operation within the DoD. Once munitions items have been demilitarized, components (e.g., metal casings, primers, propellant, etc.) can be reused (motors may be reloaded with new propellant, etc.) or recycled (the metal parts may be sold as scrap metal). Demilitarization can be done using any person, agency, or contractor that is identified as being qualified to do so. Because demilitarization involves explosively filled (or formerly explosively filled) items, an approved SOP must be in place.
- 3. Waste management requirements will not apply to the demilitarization or disassembly process until after the components are separated and there is a demonstrated intent to discard.

3.11. Combustible and Explosive Scrap Metals.

Since munitions demilitarization operations may produce combustible and explosive contaminating metals, the following applies:

- 1. All metals that have come into direct contact with explosives are classified as combustible and explosive scrap metals. This may include spent hardware from test firings.
 - a. Explosive scrap metals. All metals contaminated with more than trace amounts of explosives are classified as explosive scrap metals. These scrap metals shall be placed into separate, lockable containers. Containers must be secured, except when adding additional contaminated scrap metals. The explosive scrap metals must be managed as EHW.
 - b. Combustible scrap metals. Those metals having insufficient explosives to support combustion or detonation are classified as combustible scrap metals. These metals shall be placed into separate, lockable containers. Containers must be secured, except when adding additional contaminated metals. These combustible metals are not RCRA reactive and thus will not be managed as EHW; however, they may be considered HW based on other non-reactive characteristics.
- 2. Combustible scrap metals can be recycled using one of the following RCRA exclusions:
 - a. The "processed scrap metal" exclusion from 40 CFR 261.4(a)(13) excludes recyclable materials from RCRA waste determination requirements. In other words, the recycled material never becomes a solid waste and no waste characterization is required. Key elements of this exclusion are:
 - (1) The scrap metal must be certified inert;
 - (2) The scrap metal must be recycled and not be accumulated speculatively;
 - (3) The scrap metal cannot contain low-level radioactive materials; and
 - (4) The DoD Hazardous Waste Management Subcommittee encourages its use.
 - b. The "recyclable materials scrap metal" exclusion contained in 40 CFR 261.6(a)(3)(ii). Key elements of this exclusion are:
 - (1) The recycled scrap metal is not subject to generator, transporter, and permitting requirements;
 - (2) The exclusion is applicable regardless of hazardous waste characteristics;
 - (3) The exclusion is intended for scrap metal not excluded under 40 CFR 261.4(a)(13); and
 - (4) For the "recyclable materials scrap metal" exclusion, no waste determination and disposition records are required.

Note: Generators should consult with their Environmental Office to determine which exclusion is most appropriate, or if state or local regulations preclude these exclusions.

- 3. Although explosive-contaminated metals are excluded under RCRA, OP5 interim hazard classifications may still apply to their storage and transportation, and treatment/disposal.
- 4. Only Navy personnel or Navy-certified contractors shall transport containers with combustible and explosive scrap metal to the authorized Qualified Recycling Program (QRP) center or Defense Logistic Agency Disposition Service (DLA). With few exceptions, procedures described in (k), (l), (m), (n) and (o) shall be complied with. Only Material Documented as Safe (MDAS) can be sent to the QRP or DLA. Material that cannot be MDAS will need to be Material Documented an Explosive Hazard (MDEH) and can be sent to a qualified receiver per reference (h) paragraph 13-15.5.2 and reference (k), paragraph 3.2.i.

Note: A Qualified Receiver is an activity that has personnel or individuals who are trained and qualified in the identification and safe handling of used and unused military munitions, and any known or potential explosive hazards that may be associated with the MDEH they receive; and are licensed and permitted or otherwise qualified to receive, manage, and process MDEH.

3.12. Combustible and Explosive Scrap Non-Metals.

- 1. <u>Explosive scrap non-metals</u>. All non-metals contaminated with more than trace amounts of explosives are classified as explosive scrap non-metals. These scrap non-metals shall be placed into separate, lockable containers. Containers must be secured, except when adding additional contaminated scrap non-metals. The explosive scrap non-metals must be managed as EHW.
- 2. <u>Combustible scrap non-metals</u>. All non-metals having insufficient explosives to support detonation are classified as combustible scrap non-metals. These non-metals shall be placed into separate, lockable containers. Containers must be secured, except when adding additional contaminated non-metals. These combustible non-metals are not RCRA reactive and thus will not be managed as EHW; however, they may be considered HW based on other non-reactive characteristics.

SECTION 4: Emergency Response Procedures

4.1. Emergency and Non-Emergency Procedures and Spill Equipment.

- 1. The purpose of this section is to inform CNRSW personnel on the process in which EHW spills or releases are handled and reported and to maintain consistency with the spill/release notification requirements. However, due to the inherent reactive nature of EHW and the safety requirements in OP5, some of the following procedures may not apply (e.g., do not use a fire extinguisher to fight a fire involving munitions).
- 2. Upon discovery of any spill or release that meets or exceeds the below criteria, follow the procedures outlined below.
 - a. Any spilled substance that is greater than 5 gallons in total volume; or
 - b. Spilled substances that enters a storm drain, sewer system or body of water (bay); or
 - c. The spill is not easily contained and/or requires outside assistance to clean up; or
 - d. Spills that threaten human health, safety and/or the environment or that are from an unknown substance.
- 3. For spills/releases of any EHW meeting the criteria above, do the following:
 - a. Notify: Call 9-911 or other appropriate local emergency number and notify your respective EHW personnel, Environmental Office, and Safety Office. Explain that there is an emergency situation involving explosives so that the appropriate emergency personnel may respond.
 - b. Secure: Limit the access of personnel to where the spill/release has occurred. Use barrier tape from the spill kit or other warning items or signs to restrict access to the surrounding area.
 - c. Identify: Determine what type of substance was spilled/released by obtaining information pertaining to the substance.
 - d. Isolate: If safe, prevent the spill from spreading, cover or dike any nearby floor, storm, or sewer drains.
- 4. The responsible command (the command that has responsibility for the area where the spill/release occurred or discovered) shall coordinate any and all internal and external reporting requirements in accordance with Navy policy. The Spill/Release reporting form, Appendix E, shall be completed and retained as a permanent facility spill record.
- 5. Emergency equipment:
 - a. Spill control: Spill kits containing absorbent materials (socks, pads, kitty litter) must be located at or near accumulation areas to clean up and control liquid EHW.

- b. Communication devices: Telephones, two-way radios, or alarms must be located at or near EHW accumulation areas to notify emergency response personnel in case of a spill/release or injury.
- c. Firefighting: Portable fire extinguishers or other fire suppression equipment must be located at or near EHW accumulation areas. Note that fire extinguishers should not be used to deal with an EHW emergency, but should be used for other types of emergencies such as grass fires.
- d. Decontamination: Depending on the EHW being accumulated, an eyewash and/or shower station may be appropriate.
- e. Equipment maintenance: Ensure that all communication, firefighting, and other emergency equipment is regularly tested and maintained in proper operating condition.
- 6. Non-Emergency notification procedures: All EHW spills/releases that occur outside a building, and that do not meet or exceed the thresholds specified above, should be reported to EHWPM and the Environmental Office for any potential external notification requirements.

4.2. Explosives or Munitions Emergency Responses.

- 1. When EOD personnel conduct an emergency response, they may determine that either:
 - a. A "Level 1 Immediate Response" is required as described in detail below. In this situation, according to 40 CFR 270.1 (c)(3)(i)(D), the MR's immediate response exemption from RCRA permitting applies. Although California has not adopted the MR to date, a permit is not required to perform an immediate response to an imminent and substantial threat of a discharge of hazardous waste (22 CCR 66270.1 (c)(3)(A)). Nevada has adopted the MR and, similar to California, does not require permit to perform an immediate response to an imminent and substantial threat of a discharge of hazardous waste.
 - b. An immediate response is not required, but the situation poses an imminent and substantial risk to human health or the environment, thus a "Level 2 Imminent and Substantial Endangerment Response" is required as described in detail below. In this situation, the MR's "immediate response" exemption from RCRA does not apply.
 - c. An emergency response is not required. In these situations, continued support by EOD may not be required and the items may or may not be EHW.

2. Level 1 Immediate Response.

a. EOD and TEU personnel will use established procedures and good judgment to determine whether a situation requires a Level 1 response. The emergency response specialists will take whatever action is necessary to control or eliminate the immediate threat. Such actions may include the movement (transport) of an item to a safer location for defusing, detonation, or the performance of render-safe procedures. A EOD or TEU

- emergency response specialist is the only authority that can determine when a level 1 response is terminated.
- b. When extenuating circumstances (e.g., adverse weather, nightfall, safety) delay actions necessary to terminate an explosives or munitions emergency, the response may be delayed until the necessary action can be completed. EOD or TEU personnel, with the assistance of explosives safety and security personnel, must ensure the explosives or munitions are in a safe and secure environment during the delay.
- c. Once the EOD or TEU personnel determine the Level 1 response is over, remaining EHW, if any, must be collected and characterized by the EHWPM and/or Environmental Office to determine whether it should be managed as HW.
- d. The EOD or TEU personnel upon completion of the emergency response shall prepare an incident report. The response unit shall retain this report for three years. The report shall identify the dates of the response, the responsible persons responding, the type and description of material addressed, and its disposition.
- 3. Level 2—Imminent and Substantial Endangerment Response.
 - a. EOD and TEU personnel must determine whether the response action can be delayed until an emergency permit can be obtained without compromising safety or the environment. Once the situation is determined as a Level 2 emergency, the EHWPM shall contact the Department of Toxic Substances Control (for the State of California) or the Nevada Division of Environmental Protection (for the State of Nevada) to obtain an emergency permit by telephone and immediately follow up with a written request according to 40 CFR 270.61. After receiving the emergency permit, qualified personnel such as EOD, TEU, Quality Assurance Specialists (Ammunition Surveillance) (QASAS), weapons officers, ammunition handlers, and trained and certified DoD contractors may conduct the Level 2 response.
 - b. The emergency response specialists will take whatever action is necessary to control or eliminate the imminent and substantial endangerment threat. Such actions may include the movement (transport) of an item to a safer location for defusing, detonation, or the performance of render-safe procedures.
 - c. Once the explosives or munitions emergency response specialists determine the Level 2 response is over, remaining EHW, if any, must be collected and characterized by the EHWPM and/or Environmental Office to determine whether it shall be managed as EHW.
 - d. The EOD or TEU personnel upon completion of the emergency response shall prepare an Incident Report. The response unit shall retain this report for three years. The report shall identify the dates of the response, the responsible persons responding, the type and description of material addressed, and its disposition.
- 4. Pre-Planned EOD Support. If EOD or TEU emergency response specialists determine that emergency responses are not required for a situation, EOD may still be requested to handle

the EHW. However, if disposal support is requested from EOD, the EHWPM and/or Environmental Office shall ensure that the operations comply with applicable federal, state, local laws and regulations as well as Navy policy.

APPENDIX A: DEFINITIONS OF HAZARDOUS WASTE (HW)

- 1. A waste is a HW if it exhibits any of the characteristics of HW or is specifically listed in the CFR, CCR, or NAC.
- 2. The four HW characteristics are described below:
 - a. Ignitability.
 - (1) It is a liquid, other than an aqueous solution containing less than 24 percent alcohol by volume, and has a flash point less than 60°C (140°F), as determined by a Pensky- Martens Closed Cup Tester (ASTM Standard D-93-79 or D-93-80) or a Setaflash Closed Cup Tester (ASTM Standard D-3278-78); or
 - (2) It is not a liquid and is capable, under standard temperature and pressure, of causing fire through friction, absorption of moisture, or spontaneous chemical changes and, when ignited, burns so vigorously and persistently that it creates a hazard; or
 - (3) It is an ignitable compressed gas; or
 - (4) It is an oxidizer.
 - b. Corrosivity.
 - (1) It is aqueous and has a pH less than or equal to 1 or greater than or equal to 12.5; or
 - (2) It is a liquid and corrodes steel (SAE 1020) at a rate greater than 0.250 inches (6.35 mm) per year at a test temperature of 55°C (130°F) using test method NACE Standard TM01- 69; or
 - (3) It is not aqueous and, when mixed with an equivalent weight of water, produces a solution having a pH less than or equal to 2 or greater than or equal to 12.5; or
 - (4) It is not a liquid and, when mixed with an equivalent weight of water, produces a liquid that corrodes steel at a rate greater than 0.25 inch per year at a test temperature of 55°C.
 - c. Reactivity.
 - (1) It is normally unstable and readily undergoes violent change without detonating; or
 - (2) It reacts violently with water; or

- (3) It forms potentially explosive mixtures with water; or
- (4) When mixed with water, it generates toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment; or
- (5) It is a cyanide or sulfide bearing waste which, when exposed to pH conditions between 2 and 12.5, can generate toxic gases, vapors, or fumes in a quantity sufficient to present a danger to human health or the environment; or
- (6) It is capable of detonation or explosive reaction if it is subjected to a strong initiating source or if heated under confinement; or
- (7) It is readily capable of detonation or explosive decomposition or reaction at standard temperature and pressure; or
- (8) It is a forbidden explosive as defined in Department of Transportation regulations.

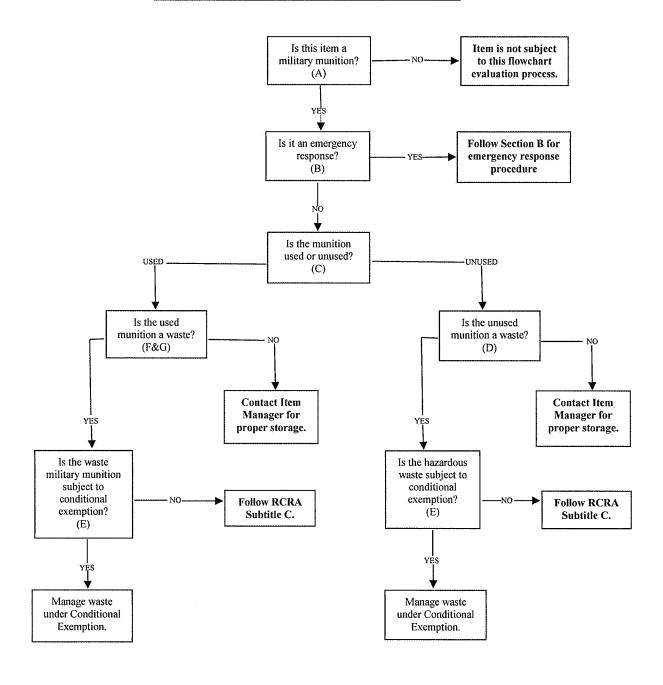
d. Toxicity.

- (1) It meets or exceeds the standards in parts-per- million for heavy metals, inorganics, organics or bioaccumulative substances, such as mercury and lead specified in federal and state regulations; or
- (2) Fails the acute aquatic 96-hour bioassay for LC 50 (Applicable in California only); or
- (3) When released, discarded or disposed of, poses a significant or potential threat to human health or the environment.
- 2. The listed HWs are included in 40 CFR 261.31 261.33. If the HW is a listed HW, use the EPA HW description for the waste. If the HW is not a listed HW use the characteristic description.

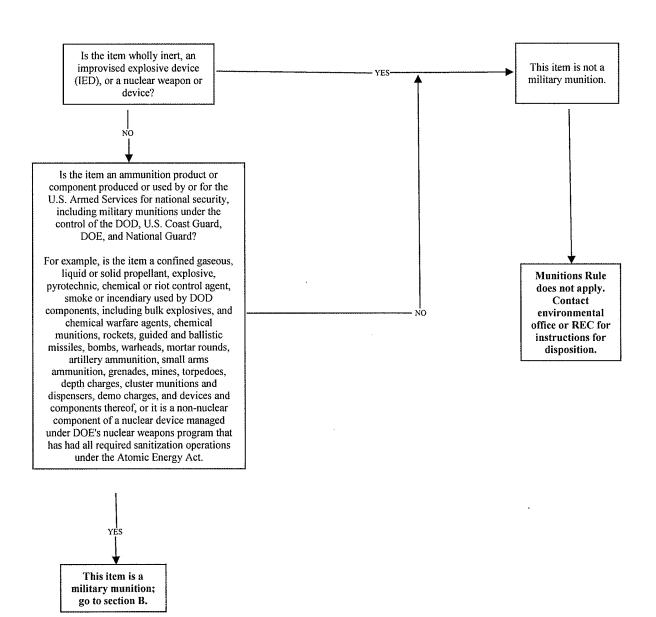
APPENDIX B: EVALUATING AND MANAGING WASTE MILITARY MUNITIONS

EVALUATION SCHEMATIC FOR IDENTIFYING WHEN MILITARY MUNITIONS BECOME WASTE.

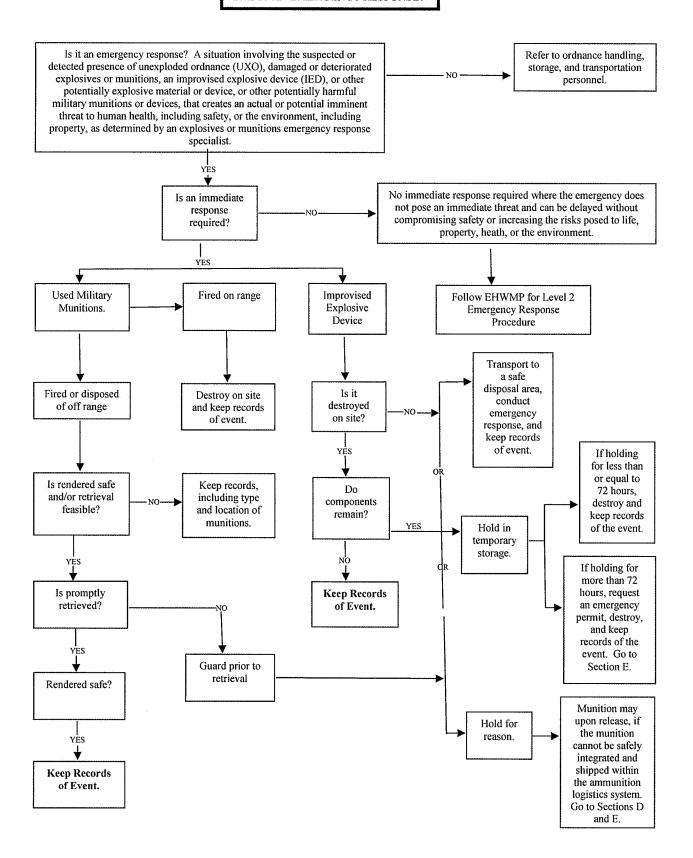
(In order to answer each question refer to the letter in parentheses & proceed to that flowchart.)



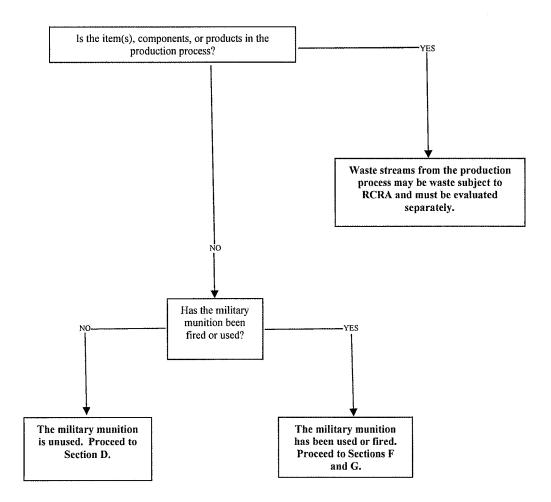
A. IS IT A MILITARY MUNITION?



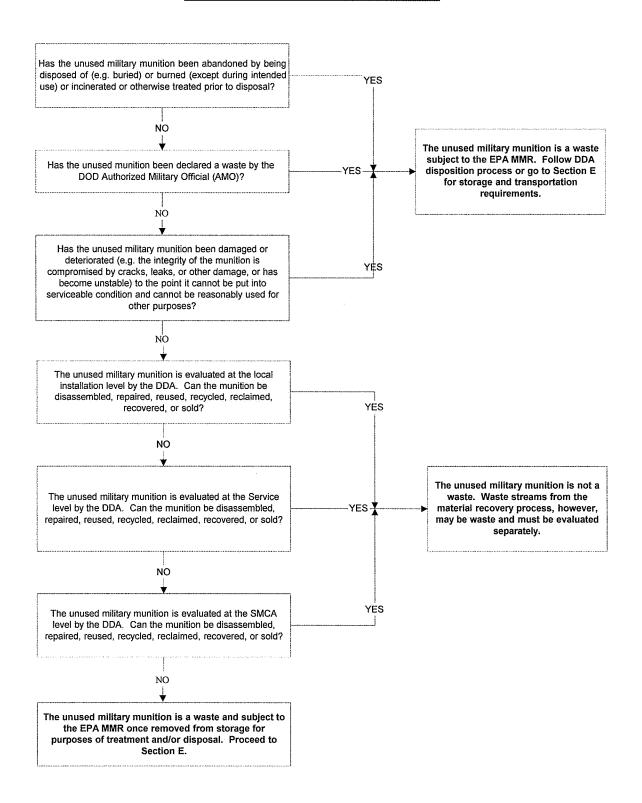
B. IS IT AN EMERGENCY RESPONSE?



C. IS THE MUNITION UNUSED OR USED?

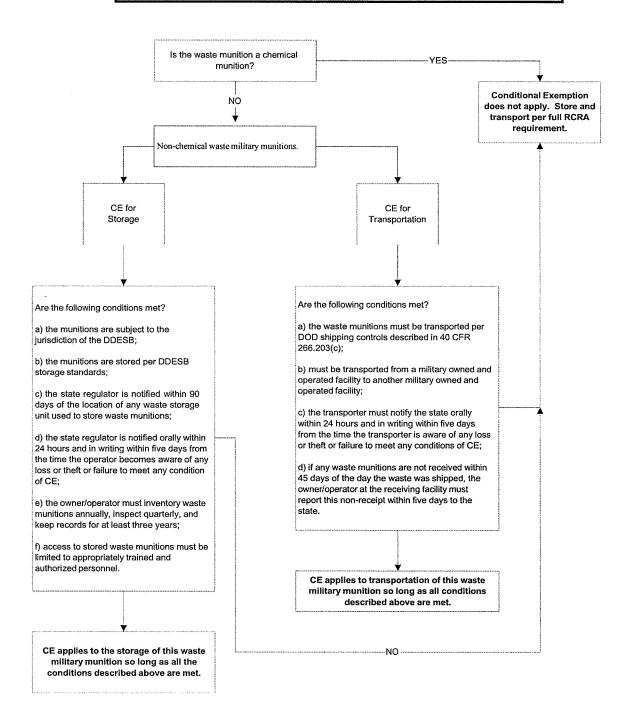


D. IS THE UNUSED MUNITION A WASTE?

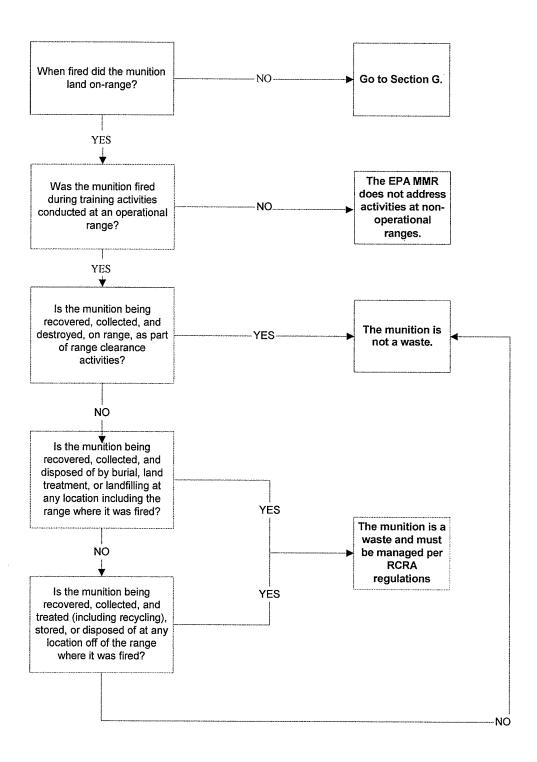


E. DOES CONDITIONAL EXEMPTION (CE) APPLY?

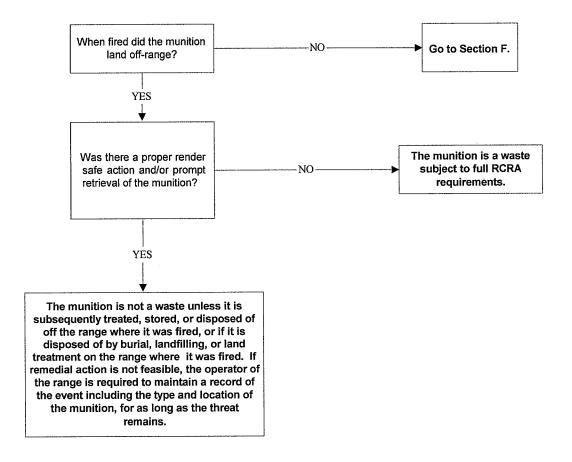
(The CE only applies to the state where munitions rule has been adopted to the extent the CE is acceptable for managing waste military munitions.)



F. USED/FIRED MUNITIONS THAT LAND ON-RANGE.



G. USED OR FIRED MUNITIONS THAT LAND OFF-RANGE



APPENDIX C: TRAINING PLAN

- 1. Personnel who have the potential to manage EHW shall successfully complete Munitions Rule training via Navy on-line training.
- 2. In addition to the above requirement, personnel who physically handle EHW shall successfully complete a HW training program per reference (a). This training program must be directed by a person trained in HW management procedures and shall include instruction dealing with HW management operations, emergency procedures, and compliance requirements. At a minimum, this program shall be designed to ensure the personnel:
 - a. Are able to respond effectively to emergencies by familiarizing themselves with emergency procedures, equipment and systems that are work center specific.
 - b. Are able to identify, separate, and segregate HW by hazard class and/or compatibility.
 - c. Are able to properly containerize, manage, and label HW.
 - d. Conduct HW accumulation area inspections by identifying deficiencies and performing corrective actions.
 - e. Take part in an annual review of the initial HW training as it applies to their assigned duties.
 - f. Comply with all requirements identified in this REHWMP.
- 3. Personnel who physically handle EHW must successfully complete the initial training within six months after the date of their assignment and cannot work unsupervised until they have completed the initial training requirements. An annual refresher course must be completed during the month when the initial training was completed. Refresher training can be provided as on-site or off-site classroom, or as documented on-the-job training (i.e., safety stand downs, weekly safety stand- up meetings, hazard control briefings).

APPENDIX D: HAZARDOUS WASTE ACCUMULATION SITE WEEKLY INSPECTION FORM AND CHECK LIST

Month/Year ______ Building _____

Inspector (Spell out Full Name)						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
					,	

Note to Inspector: You must inspect your area once a week. Sign and date the block when the inspection was conducted. If you have a deficiency, write down the nature of the deficiency and how you corrected the deficiency in the table below. If you do not have a deficiency then you do not need to write in the table.

Date/Time	Deficiency Observed/Corrected	Corrective Action Performed Date/Initial	

INSPECTION CHECK LIST

- 1. Is overall good housekeeping maintained?
- 2. Are all the trash cans and bins, including outside dumpsters, free of HW and hazardous material?
- 3. Is the pavement or floor near the area free of spills, debris, or other hazardous conditions that could interfere with proper handling?
- 4. Is there adequate aisle space to allow inspectors to move between drums and read all labels?
- 5. Is hazardous material stored separately from EHW?
- 6. Are incompatible wastes stored separately or separated by their own secondary containment (if applicable)?
- 7. Is the secondary containment, if used, free of leaks, accumulated liquid, and in good condition?
- 8. Do all waste containers have properly completed hazardous waste labels to include the words "HAZARDOUS WASTE", address, building number, accumulation start date, contents, hazard class (ignitable, reactive, corrosive, or toxic), and physical state (solid, liquid, or gas)?
- 9. If the container is full, is the date the container became full marked along with the accumulation start date?
- 10. For empty drums being stored for reuse (capacity greater than 5 gallons), is the container marked empty and is the container marked with the date it became empty?
- 11. Are all EHW containers closed/secured, with the ring or bung attached if using drums, except when adding waste?
- 12. When drums are reused, are all old labels and markings removed or obliterated?
- 13. Are containers holding ignitable wastes grounded during transfer operations?
- 14. Are all EHW containers in good condition?
- 15. Is all EHW being stored for less than 90 days?
- 16. Is a spill kit containing absorbent materials (socks, pads, kitty litter) located at or near the site to clean up and control liquid EHW releases?

- 17. Is a portable fire extinguisher or other fire suppression equipment located at or near the site? Note that fire extinguishers should not be used to deal with an EHW emergency, but should be used for other types of emergencies such as grass fires.
- 18. Is a telephone, two-way radio, or alarm located at or near the site to notify emergency response personnel in case of a spill/release or injury.
- 19. Is an eyewash available and operable at or near the site (if applicable for the EHW being accumulated)?
- 20. Are all communication, firefighting, and other emergency equipment regularly tested and maintained in proper operating condition?
- 21. Are any deficiencies found corrected immediately and is the word "corrected" noted in the inspection log along with the responsible party's initials?

APPENDIX E: SPILL REPORT

- 1. Name of the person reporting:
- 2. Command reporting spill:
- 3. Phone number of the person reporting:
- 4. Date and time that the spill occurred:
- 5. Exact address or location of the spill:
- 6. Type of HM or HW spilled:
- 7. The amount of HM or HW spilled:
- 8. Describe the conditions at the spill location:
- 9. Describe control and containment:
- 10. Describe any samples taken:
- 11. What notifications were made:
- 12. Disposition of spilled substance: