



**GUIDE TO  
ENVIRONMENTAL COMPLIANCE  
REQUIREMENTS  
  
FOR  
  
CONTRACTORS AND  
SUBCONTRACTORS**

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# Environmental Compliance Requirements for Contractors and Subcontractors

## Revision Status

| REVISION | ISSUE DATE | BRIEF DESCRIPTION OF CHANGE   |
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| NR       | 30 JAN 18  | Initial Release   |
| 1        | 16 OCT 19  | Revised, updated, and clarified guidance. Revised manual to make it consistent with Naval Base Kitsap (NBK) guidance and practices. |
| 2        | 4 DEC 20   | Some minor format changes.  |
|          |            |   |
|          |            |   |

## **ABOUT THIS GUIDE**

Compliance with all applicable Federal, State, local laws, and Department of Navy environmental requirements is mandatory. This *Contractor's Guide* is provided to help assist contractor's with complying with Environmental requirements while working on base.

This guide is intended to provide general guidance for contractors working within the Naval Base Kitsap (NBK) Keyport installation, and is sometimes referred to in the document for simplicity sake as the "base" or "Keyport". Where the guide references the "Base Environmental Office (BEO)" the document is referring to the Points-of-Contact listed in the guide's BEO telephone listing. These points of contact may be NAVFAC or NUWC Division Keyport personnel depending upon internal Navy roles and responsibilities and host-tenant command support agreements. All contractor BEO coordination should be coordinated through the contracting officer's representative and/or contracting officer.

This document is for guidance and training purposes only. It remains the contractor's duty to comply with all applicable laws, regulations, and local requirements and this guide alone cannot assure such compliance. To the extent, the guidance contained in this document conflicts with contract specifications, the contract specifications are the controlling document. If the contractor believes this guidance conflicts with contract specifications, these concerns shall be addressed with the Contracting Officer and/or Contracting Officer's Representative (COR).

## **EMERGENCY RESPONSE INFORMATION WHILE WORKING ON BASE**

When an emergency happens (Medical Assistance, Fire, Flooding, Spill Response, etc.) minutes matter and valuable time can be lost if searching for an emergency contact or location information.

**IMPORTANT:** There are different numbers to call at Keyport depending upon what phone system you are calling from.

### **Personal/Company Mobile, or Non-Navy Phones**

When using a personal or company supplied *mobile phone or a non-Navy phone* call:

**Navy Regional Dispatch Center:**

- **Emergency Phone: (360) 396-4444**
- **Non-Emergency Phone: (360) 315-4064**

NOTE: All 911 calls made on Navy property from mobile phones or non-Navy phones are routed to Kitsap County Central Command (CENCOM), which must then relay your information to the Navy Regional Dispatch Center. This is an unnecessary additional step, which could delay response.

### **Navy Phones**

When using a *Navy phone* on a Navy exchange call:

**Navy Regional Dispatch Center:**

- **Emergency Phone: 911**
- **Non-Emergency Phone: 5-4064**

**NUWC Division, Keyport Duty Office Only:**

- **Non-Emergency: 6-2244**

Critical information the dispatcher needs to know:

- ♦ **WHAT BASE ARE YOU CALLING FROM?** NBK Keyport
- ♦ **WHERE IS THE EMERGENCY?** Give the address, nearest cross street, and include building number, spelling out, e.g.; Building One-Zero-Five-Zero, instead of Building Ten-Fifty.
- ♦ **WHAT'S THE EMERGENCY?** Medical, Hazardous Material (HAZMAT) Spill, Explosive incident, Fire (Smell of smoke, etc.)
- ♦ **WHO NEEDS HELP?** Age, gender and number of people.

Once you have relayed the information, the dispatcher will verify it so don't hang up yet!

Remain calm and give direct answers to the questions asked. Speak slowly and clearly. The dispatcher will ask additional questions so they can send the right type of help. All questions are important. The dispatcher may also provide you with CRITICAL PRE-ARRIVAL INSTRUCTIONS, so listen carefully. Lastly, ensure someone with knowledge of the emergency is standing by at the building entrance or street corner to flag down responding units and escort them to the scene.

## **BEO TELEPHONE LISTING**

Below are designated points of contact for various Environmental program areas. These individuals may provide information and guidance, but are not authorized to provide direction to contractors. Only the Contracting Officer is authorized to make final determinations on appropriate actions. For general Environmental compliance information related to projects, the Environmental Project Coordinator will be the primary Environmental office point of contact, and should be able to direct any questions to the appropriate program manager or subject matter expert.

### **EMERGENCIES** (Medical Assistance, Fire, Flooding, Emergency Spill Response, etc.):

When using a (personal) telephone/mobile (360) 396-4444  
When using a Keyport (government) telephone ..... 911

**ENVIRONMENTAL PROJECT COORDINATOR (NUWC KEYPORT) ....** (360) 315-8571  
**ENVIRONMENTAL PROJECT COORDINATOR (NBK) .....** (360) 396-5879

**ENVIRONMENTAL DIRECTOR (NAVAL BASE KITSAP) .....** (360) 315-5411  
**ENVIRONMENTAL MANAGER (NUWC KEYPORT) .....** (360) 396-5682

### **ENVIRONMENTAL POINT OF CONTACT**

Air Discharges and Ozone Depleting Substances ..... (360) 396-5878  
Asbestos Management ..... (360) 315-3833  
Hazardous Material Management ..... (360) 396-5438  
Hazardous (Dangerous) Waste Management ..... (360) 396-2320  
Installation Restoration (Contaminated Superfund Sites) ..... (360) 396-0060  
Solid Waste Management ..... (360) 396-7005  
Spill Prevention and Response Planning ..... (360) 315-8571  
Spill Prevention and Response (SPCC) and Tanks (UST's & AST's) .... (360) 315-2451  
Storm water ..... (360) 315-1992  
Water Quality, Sewer/Wastewater Discharge ..... (360) 315-8571  
Forestry ..... (360)-396-0064

### **ENVIRONMENTAL SERVICES:**

Hazardous Waste Services (Labels, Drums, Pickups, etc.) (360) 396-7992  
Hazardous Waste Services Email: KYPT\_TSDFHazardousWaste@navy.mil  
Hazardous Waste Designation ..... (360) 396-7991

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**Note- Forms listed in Appendix A are Examples provided for training and background and are not maintained up to date. Current up-to-date versions of Submittal forms should be obtained from the Project Manager and/or BEO.**

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## **INTRODUCTION**

The Navy is committed to being a good environmental steward; operating in a manner compatible with the environment and in compliance with environmental regulations. The NUWC Division, Keyport's Environmental Policy proclaims the Navy will operate in an environmentally responsible manner while performing its mission, and any company under contract with the Navy, must also provide a personal commitment to environmental protection.

### **ENVIRONMENTAL POLICY**

It is the Environmental Policy of the NUWC Division, Keyport that we are committed to:

- *Conducting business in an environmentally responsible manner that promotes pollution prevention, resource conservation, and environmental stewardship.*
- *Operating our processes in compliance with applicable legal requirements and with other requirements that relate to our environmental aspects.*
- *Continually improving our workplace to reduce environmental risk.*
- *Developing annual targets to serve as guidance for planning and operations.*
- *Ensuring this policy is communicated to all persons working for or on our behalf and is available to the public.*

This commitment is important regardless of whether your job is large or small. Whether you are involved in a major construction project or a small paint job, it is mandatory to consider the environment in all of your operations. Your awareness and participation are vital to the success of the Navy's mission and our ability to comply with the various environmental laws.

To support the Navy's Environmental policy, all contractor's working at Keyport should be knowledgeable of:

- ◆ NUWC Division, Keyport's Environmental Policy (included above),
- ◆ Potential environmental impacts/aspects associated with their work, and
- ◆ Emergency response procedures while working on base.

Environmental regulations continue to evolve and change. Keyport operates under separate discharge permits for air emissions, wastewater/sewer discharges, and stormwater discharges. Specific to hazardous waste, Keyport operates as a large quantity generator. Compliance with environmental regulations requires specialized knowledge and expertise. The Base Environmental Office (BEO) will provide information that will help in understanding environmental compliance responsibilities while working on base.

## **ENVIRONMENTAL COMPLIANCE**

“Environmental compliance” means conforming to all applicable environmental laws/regulations including site-specific permits and program requirements. The cost of environmental compliance is a legal responsibility. Non-compliance is far more costly over time as consequences of serious violations can include individual penalties and civil/criminal charges as well as bad publicity, which will affect relations with the community as well as the ability to receive new contracts. Contractors must always include environmental compliance in their policies, procedures, and operations.

Large projects such as construction projects will have environmental controls specified in the contract. The contract will specify if a formal Environmental Protection Plan must be submitted to the Contracting Officer for review and comment (a generic Environmental Protection Plan template is available upon request). If this requirement is not specified in the contract, a meeting with members of the Base Environmental Office (BEO) is recommended and may be required by the contract prior to starting the job to ensure that the contractor has an adequate understanding of all applicable requirements and site specific considerations for working at Keyport.

All contractors and contractor personnel are required to comply with all applicable federal, state, and local environmental laws and regulations applicable to the work they are performing at all times. It is incumbent upon the contractor to know, understand, and follow all relevant rules and regulations pertaining to protection of the environment while performing work for which they are contracted.

Additionally, there may be project and site specific considerations to ensure compliance with environmental rules and regulations while performing work in conjunction with the government at Keyport.

Potentially significant environmental considerations for working at Keyport, depending upon the specific work to be performed, includes but is not limited to:

- Knowing the Emergency response numbers and procedures at Keyport.
- Hazardous Material (HM) approval and management procedures for use of HM at Keyport.
- How to properly manage and dispose of solid waste, recyclable waste, and Hazardous waste on base
- Your requirements, roles, and responsibilities for specific environmental impacts known to be applicable to the work being performed.
- Understanding your responsibilities related to existing government permits applicable to the work being performed.

If it is not clear how these considerations should be addressed during your project, you should request clarification from your COR.

## **ENVIRONMENTAL TRAINING**

In addition to compliance with all applicable federal, state, and local environmental laws and regulations, all contractors and contractor personnel are required to comply with applicable certification and training requirements related to the work performed.

Depending upon the work being performed, Navy instructions and existing facility permits may require that contract employees receive additional site specific environmental compliance training prior to beginning work onsite. This *Contractor's Guide* is provided to help assist contractor's with complying with Environmental requirements while working on base.

Keyport has developed general environmental awareness training for personnel working onsite, which is designed to meet all site specific awareness level environmental training requirements for working on-base. Awareness training specifically satisfies personnel awareness level training requirements for Emergency Response, NUWC Division, Keyport's Environmental Management System (EMS), stormwater pollution prevention, Hazardous Waste (HW) management, and base environmental protection programs.

Additionally, groups that generate and manage Hazardous Waste (HW) at Keyport are required to appoint a HW Site Manager and HW Site Manager Alternate. HW Site Managers and Alternates receive more detailed training on HW management procedures and requirements while working on base than general awareness level training.

Site specific government provided training does not relieve the contractor from knowing and complying with all federal, state, and local training and certification requirements necessary in order to perform the duties specified in the contract.

Site specific government provided environmental training is available from the BEO in person and electronically and should be scheduled through the project COR

## **SPILL PREVENTION AND RESPONSE**

To ensure protection of Washington waters, land, air, and natural resources from the impacts of Oil and Hazardous Substance (OHS) spills, you must operate in a manner that will provide the best protection for the environment. Implementing the following procedures will help reduce the risk of a spill occurring and minimize the potential impacts if a spill does occur.

### **Storage Tanks and Oil Filled Equipment**

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Keyport has many Above Ground Tanks (ASTs), transformers, generators, and oil filled

operational equipment. Due to the quantity of oil in storage at Keyport, an Oil Spill Prevention Control and Countermeasure (SPCC) Plan is required to meet the Environmental Protection Agency (EPA) regulations of 40 CFR 112. The purpose of the SPCC Plan is to describe the general operating design/procedures that affect the facility's potential for the discharge of oil products (which includes oil in any form) and to document measures taken to prevent discharges of oil into waters of the United States. It also describes procedural, structural and equipment improvements, and/or upgrades that must be implemented to satisfy the requirements of 40 CFR 112 for over water transfer of oil.

Oil in any form in containers of 55 gallons or larger is subject to the regulations of 40 CFR 112 (known as the "SPCC Rule"). Any new oil containers of 55 gallons or larger brought on base must be listed in the Keyport SPCC plan and follow the SPCC Rule. Any repair, change in location, or alteration to any Underground Storage Tank (UST), Above ground Storage Tank (AST), oil container, or oil filled operational equipment must be reported to the BEO so it can be documented in the SPCC plan and to ensure that there are adequate spill containment controls in place. Any new USTs or changes to existing USTs or their ancillary systems must also be in accordance with federal, state, and local requirements and reported to the BEO.

Additional information regarding Oil and Hazardous Substance (OHS) storage and OHS storage tanks, may be obtained from the BEO via the COR.

## **Preventative Measures**

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- ◆ All OHS Handling and transfer equipment shall be inspected prior to use and during operation to ensure equipment is in proper working condition. All connections and transfer points shall be carefully checked prior to, during, and after transfer operations to monitor for leaks. Hose connections shall be wrapped and/or containment placed under them. All storm drains near the transfer location shall be covered with temporary storm drain mats.
- ◆ All OHS shall be carefully controlled and all OHS liquid storage areas must be properly managed. Areas that can impact the stormwater system must have discharge control structures (e.g., curb, sumps, secondary containments, or other types of spill prevention) to contain potential spills, leaks, and discharges. Storage of OHS containers in uncovered secondary containment locations must have provisions for sampling of, controlled draining of, and proper disposal of stormwater that accumulates in the containment area. You, as a contractor, are responsible for storing your OHS only in authorized areas and in an authorized manner.
- ◆ Keyport will respond to all spills, but contractors must provide a spill response kit and discharge control devices for any handling and transferring operation involving OHS. The kit needs to contain items appropriate for the clean up of the type of spill that could occur. If you have any questions concerning this requirement,

contact the COR and the BEO.

## **Required Training for Petroleum Transfers**

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The Washington Department of Ecology requires that all personnel involved in bulk petroleum handling operations are certified. Certification is accomplished by successful completion of a training course in Oil Spill Prevention and Response. Key supervisory and operations personnel must have a certification that meets the requirements of WAC 173-180C.

Key operations personnel are identified as employees with direct involvement in the transfer, storage, handling, or monitoring of oil (e.g., person-in-charge, storage tank operators, or oil transfer monitors). Key supervisory personnel must directly supervise the transfer, storage, handling, or monitoring. Before conducting any OHS transfer at Keyport, you are responsible for ensuring your personnel are trained to the State and facility specific requirements **before** starting the operation. Over-water OHS transfers are subject to additional requirements and must be coordinated with the BEO.

Additional help or clarification on the required training for certification may be obtained from the BEO via the COR

## **SPILL EVENTS**

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A spill event involves the unauthorized spilling, leaking, pumping, emitting, emptying, discharging, injecting, escaping, leaching, disposing, or dumping of oil or a hazardous substance. Spill events are categorized as non-emergency or emergency. All spill events, regardless of whether they are classified as an emergency or non-emergency spill event, must be reported by dialing (360) 396-4444.

### **NON-EMERGENCY SPILL EVENT**

A non-emergency spill event is a discharge of a known material or any hazardous substance that can be cleaned up as part of normal housekeeping by the personnel who discovered the spill. The spill does not pose an immediate threat to human health or the environment and is not released on the soil, into any waterway inlet (e.g., storm drain), or outside Keyport's boundaries.

Actions Required:

- Stop the source of the spill.
- Call 360-396-4444 and report the event.
- Contain the spilled material by keeping the spill away from drains or waterways and by blocking off drains located near the spill if the spill may reach them.

- Clean up the spilled material wearing the proper personal protective equipment.
- Dispose of the spill debris properly (see Waste Management sections of the guide).

## **EMERGENCY SPILL EVENT**

An emergency spill event is any release of a known or unknown material or hazardous substance that poses an immediate threat to human health or the environment. In these situations, the individual that discovers the spilled material must immediately dial (360) 396-4444 to report the incident. All unpermitted or uncontrolled releases on land, or discharged to any waterways or outside base properties, are classified as emergency spill events.

### **Actions Required:**

- Immediately take action as appropriate to contain or stop the source of the spill if this action can be taken without jeopardizing the health or safety of yourself or other people.
- If the properties of the material are unknown or they are a threat to human health, evacuate the area and go upwind.
- Immediately dial (360) 396-4444 and provide the requested information.
- Warn others in the area and direct them upwind.
- Make yourself available to emergency response personnel.
- Provide Safety Data Sheets (SDS) for the spilled material to the emergency response personnel
- Notify the Contracting Officer.

## **HAZARDOUS MATERIAL MANAGEMENT**

***“Hazardous Material (HM)”*** is defined as any material that, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may pose a substantial hazard to human health or the environment.

The procurement, storage, use, and minimization of HM's at Keyport requires control and management measures to protect the user and environment from potential or actual hazards. All HM's to be brought onsite, must be reviewed and approved by the BEO.

To ensure employee safety, plan for effective emergency response, and to ensure compliance with facility Emergency Planning and Community Right-to-Know reporting requirements, contractors are required to provide Safety Data Sheets for all Hazardous Material they bring onto the base, and provide information regarding the amount and type of HM they will be using and storing while performing contract work on base.

## **Hazardous Material Management and Approval**

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All HM brought onto Keyport by contractors must be labeled clearly as “Contractor Owned Material” and reported to the BEO. This requirement is accomplished by contractor pre-labeling material prior to bringing the material onsite, and by submission of Safety Data sheets (SDS’s) and the Contractor’s Hazardous Material Inventory (CHMI) form (*an example of the CHMI form is include in Appendix A*).

Provide a *Safety Data Sheet* (SDS) for each HM to that will be used and stored on base during the performance of the contract along with the quantity (to include type and size of containers) that will be brought on base, where and how it will be used, and how many days it will be on base. HM’s include, but are not limited to, hazardous gases, liquids, powders, or solids, such as acids, alkalis, bases, caustics, cleaners, coatings, coolants, corrosives, cryogenics, degreasers, finishes, epoxies, flammables, fluxes, inks, lubricants, oils, paints, sealants, solders, solvents, strippers, toners, thinners, varnishes, and waxes.

If additional HM’s are needed as work progresses, submit SDS’s for new material along with a revised CHMI that includes information for the new material. Contractors are responsible for ensuring that while on base, their HM is stored safely and in compliance with applicable federal, state, and local regulations so that the material does not become an employee safety, fire, or spill risk. Contractors shall also ensure their employees are apprised of material hazards per the Occupational Safety and Health Administration (OSHA) Hazard Communication (HAZCOM) standard. This standard states that employees have the “Right-to-Know” about hazardous materials in their workplace. Any personnel working with hazardous material should have hazard training in accordance with the HAZCOM standard.

All unused or partially used HM that is brought on base by the contractor for the performance of their work is the property of the contractor and shall not be left at the facility or turned in to the government for disposal as Hazardous Waste upon completion of work.

**Quick Tip: Plan jobs to ensure processes or operations use the least hazardous option and minimum quantity necessary for the job. This saves costs and reduces waste. Ensure that all HM is clearly labeled as “Contractor Owned Material” while onsite, and ensure that SDS’s are submitted and an up to date CHMI form is maintained for all of your on-site HM that will be used as part of the contract. Upon completion of the project, remove all unused/partially used HM from the site.**



## **Restricted Hazardous Materials**

Certain chemicals contained in HM's are prohibited for use on base without a viable and compelling technical need and the use of HM's containing some chemicals are restricted due to specific safety and environmental risks associated with the chemicals.

Example of potentially prohibited or restricted chemicals include but are not limited to: leads, chromiums, mercury, phenols, trichloroethylene, halons, PCBs, asbestos, silica sand (for use as blasting agent), Class I Ozone Depleting Substances (ODS) within Heating, Ventilation, & Air Conditioning System (HVAC) or fire suppression systems, radioactive materials or instruments capable of producing ionizing radiation, and chemicals listed in 40 CFR 355.50, Appendix A. The Contracting Officer may consider exceptions to the use of any of the above excluded materials upon written request by the Contractor, and with BEO approval via the COR

Restricted materials will require special controls for use, and may not be used in a manner such that the vapors, fumes, aerosols, or other mobile hazards could potentially reach unprotected work areas or thoroughfares.

## **WASTE MANAGEMENT**

The composition and estimated quantity of each waste expected to be produced as part of your project should be identified. For larger projects, this information is typically included within the project Specifications.

Each waste that will be produced must be categorized as Hazardous (HW), Refuse (R), or Recyclable Material (RM). A waste is considered hazardous if it meets certain levels of reactivity, ignitability, corrosivity, or toxicity, or is otherwise listed as a hazardous waste. The State of Washington regulates more waste as hazardous than mandated by Federal Law, and has adopted the term "dangerous waste" to include Federal hazardous waste and State regulated waste.

Proper waste management coordination is not only needed for compliance, it also benefits projects by preventing time delays or operational shutdowns and improves public relations. Therefore, it is always beneficial to maintain a proactive approach to ensure that waste is handled properly, and disposed of in a timely manner.

## **HAZARDOUS (DANGEROUS) WASTE MANAGEMENT**

The Keyport facility is regulated as a large quantity generator of Hazardous Waste (HW). All HW generated onsite must be designated at the point of generation, and managed in accordance with NUWC Division, Keyport's dangerous waste management plan and procedures and WAC 173-303 requirements for large quantity generators.

Keyport uses the terms hazardous waste and dangerous waste interchangeably, so use of the term hazardous waste in this guide includes all waste regulated by Washington State.

Hazardous waste management and compliance with HW management requirements is a responsibility which must be planned for and accepted as a cost of doing business with the government.

## **HW Management Training**

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Projects which generate and manage HW at Keyport are required to appoint a HW Site Manager and HW Site Manager Alternate. The HW Site Manager and Alternate receive detailed site specific training on HW management procedures and requirements for working on base and are responsible for interfacing with the BEO to ensure HW management requirements are satisfied throughout the duration of the project.

NUWC Division, Keyport HW Site Manager/Alternate training is provided by the BEO and may be conducted in-person or electronically, contractors should contact their COR for scheduling HW Site Manager/Alternate training.

## **Waste Determination (Designation)**

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Waste Designation is the process of determining whether a waste meets the requirements of a Hazardous (Dangerous) Waste. All waste, not just the waste that is known to be dangerous or hazardous, is required to be designated at the point of generation, to ensure proper storage and management of the waste. Hazardous waste is required to be managed properly and accounted for from the point where the waste is generated (cradle) to the point where it is finally disposed of and determined to no longer be hazardous (grave).

As the owner of the facility, and owner of the facility's Environmental Protection Agency (EPA) Waste ID#, the Navy is responsible for determining whether waste generated at the facility meets the requirements of hazardous (dangerous) waste.

Designation of waste at Keyport is performed by the BEO, and is documented using the Waste Generation Record (WGR) form (*an example of a WGR form is included in Appendix A*). The project HW Site Manager/Alternate submits a WGR form to the BEO for each waste stream that will be generated while working on-base as part of the contract.

In some cases, it may not be known whether a waste is a HW until testing can be conducted to verify the waste's dangerous characteristics. In such cases, the waste containers shall be put into separate secondary containment, based on the type of

waste contained, and labeled as “*Waste Awaiting Designation (WAD)*” along with the most probable waste hazards, if known (for example flammable liquid/solid, corrosive, toxic, etc.). WAD containers, shall be managed as HW and labeled with known or reasonably expected hazards, until determined otherwise, but should be physically segregated from containers of known designated HW.

The project HW Site Manager/Alternate will be expected to fill out the WGR form to the best of their knowledge and provide any information requested in order for the government to properly and accurately designate the waste.

## **Waste Sampling**

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At times, it is necessary to sample and analyze waste to determine whether the waste meets the definition of hazardous waste. The BEO will determine the required analysis necessary in order to properly and accurately designate waste. The contract will specify whether sampling and analysis services for hazardous waste designation is the responsibility of the contractor or the government.

Typically, sampling and laboratory analysis for waste designation for projects is conducted by the BEO. If waste designation sampling and analysis will be conducted by the BEO, you will need to coordinate with the COR to partner with BEO personnel to obtain a representative sample(s) of project waste streams.

If the contractor is to provide sampling and analysis services for waste designation as part of the contract, contract sampling personnel must be trained and proficient in required environmental sampling techniques and procedures and contract laboratories must meet applicable accreditation standards for the analysis being conducted.

If you will be providing sampling and analysis services as part of the project, sampling personnel qualifications and laboratory, accreditation should be included within the project’s contract submittals.

## **Waste Containers**

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HW generated during work on base must be stored in appropriate containers immediately at the point where the waste is produced. Projects must have proper containers on-hand to contain hazardous waste, **BEFORE** any hazardous waste is produced.

General tips and guidelines for container management:

- Maintain containers closed at all times, except when waste is being added or removed. Containers with liquids must be closed and secured with ring and bolt, or bung screwed in (wrench tight) and provided with secondary containment that will contain 100% of the single largest container present and at least 25% of all

containers. Containers with solids must have snug fitting lids. Containers containing volatile organic compounds, must meet appropriate requirements for adequately containing vapors.

- No items except waste specifically designated for the container may be placed in the container.
- Only re-use containers for the same waste stream.
- All containers must be appropriately labeled (see labeling) and positioned so that the labels are clearly visible. Place the labels on the side of the upper one-third of the drum whenever possible. When using roll-off boxes, place labels on the door of the container.
- Maintain a minimum of 30 inches of aisle space between each row of containers, so that all containers can be readily inspected and material handling and emergency response personnel can access all containers.

The contract will specify who is responsible for supplying containers for storing HW while working on base. If the contract does not specify or is unclear, immediately notify the COR.

If it is your responsibility to provide hazardous waste containers, ensure the containers used meet all federal, state, and local requirements for storage and transportation of the waste that will be stored in it. It is also recommended that consideration be given to optimizing the size of the containers for ease of handling, transport, and management.

If it is the government's responsibility to provide HW containers for the project, containers will be supplied by the BEO. Contact the BEO through the COR to schedule container pickup/delivery.

*Hazardous Waste Services (Labels, Drums, Pickups, etc.) (360) 396-7992*  
*Hazardous Waste Services Email: KYPT\_TSDFHazardousWaste@navy.mil*

## **Waste Labeling**

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All containers containing HW must be labeled appropriately in accordance with federal, state, and local environmental regulations.

The BEO will supply the appropriate waste labels (i.e., HW, WAD, and DOT) for waste produced by projects at Keyport. Empty containers shall be labeled clearly as "Empty". Contact the BEO to schedule label pickup/delivery.

*Hazardous Waste Services (Labels, Drums, Pickups, etc.) (360) 396-7992*  
*Hazardous Waste Services Email: KYPT\_TSDFHazardousWaste@navy.mil*

## **Waste Accumulation Areas**

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Project HW is required to be controlled properly at the point of generation. All project HW must be stored at the project site in accordance with the waste accumulation requirements for large quantity generators. Contractor waste accumulation areas must meet Satellite Accumulation Area (SAA) and <90 day accumulation area requirements, contained in WAC 173-303, as applicable. Keyport is required to maintain an up to date record of all HW accumulation areas located on base, along with information regarding the types and quantities of HW stored in those areas to ensure effective emergency management planning.

General tips and guidelines for establishing and managing Waste Accumulation Areas:

- Locate project SAA's and <90 day areas in order to minimize the potential impact of spills. Pick a site that minimizes weather impact. If possible, avoid siting accumulation areas over the water or upslope from the water or a storm drain. Consider the use of curbing or storm drain protectors to minimize the impact of potential spills.
- Ensure fire extinguishers are available and emergency response signage is adequately posted.
- Accumulation start dates must be accurately maintained. Waste from SAA's must be transported to a <90 day site or to the Building 1051 TSD within 72 hrs of filling the waste container. Waste from <90 day sites must be transported offsite or to the Building 1051 TSD within 90 days of the waste being generated.
- Ensure Accumulation areas are used only for the storage of HW and waste awaiting designation (WAD). Do not store HM, materials, or other equipment within project waste accumulation areas.
- All Project Accumulation areas must have appropriate signage. Signs reading "HAZARDOUS WASTE ACCUMULATION AREA" and "DANGER - UNAUTHORIZED PERSONNEL KEEP OUT" must be posted at the entrance to the accumulation area and legible from a minimum distance of 25 feet.
- **"NO SMOKING OR OPEN FLAME"** signs should be posted on all visible sides of the accumulation area and be legible from 50 feet.
- The HW Site Manager and/or Alternate must perform weekly documented self-inspections of accumulation areas.

The BEO will conduct periodic inspections of facility accumulation areas and the HW Site Manager/Alternate and the COR will be notified if any deficiencies are identified. During the duration of the project, the HW Site Manager/Alternate should maintain a weekly logbook of their self-inspections and document any findings and corrective actions implemented. The COR and BEO should be notified of any significant findings of non-compliance.

When the project is complete, prior to closure of any accumulation area(s), any and all containers, liners, signage, or material must be removed from the site and the site returned to its original condition.

The BEO will inspect project HW accumulation areas prior to establishment and disestablishment. Arrange for establishment and disestablishment of project Satellite Accumulation Area's (SAA's) and < 90 day areas by contacting the BEO and using the Site Registration Form (*an example of the Site Registration Form is included in Appendix A*).

*Hazardous Waste Services (Labels, Drums, Pickups, etc.): (360) 396-7992*  
*Hazardous Waste Services Email: KYPT\_TSDFHazardousWaste@navy.mil*

## **Waste Pickup, Shipment, and Disposal**

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HW generated at Keyport is required to be managed under NUWC Division, Keyport's HW management program, and shipped and disposed of under Keyport's site EPA ID#. NUWC Division, Keyport owns and operates a permitted Treatment, Storage, and Disposal (TSD) Facility on base, where HW may be safely stored, consolidated, and sometimes treated onsite. The permit for NUWC Division, Keyport's TSD facility allows for safe storage of HW at the site for a period of time of up to one year.

Arrange for waste pickup and/or shipment for disposal with the BEO prior to project waste meeting accumulation area storage time limits. The majority of project non-bulk waste will be arranged for pickup by the BEO and consolidated and stored at the onsite TSD facility prior to eventual shipment offsite for disposal. In some instances, it may be advantageous to ship waste directly to an offsite receiving facility from the project site. In either instance, the government will determine waste shipment requirements and must maintain documentation related to the HW being shipped, the HW receiving facility, and the means by which the waste was ultimately disposed of by the receiving facilities.

The contract will specify whether HW disposal costs are the responsibility of the government or the contractor. Regardless of who is responsible for waste disposal costs, no HW may be shipped offsite without the authorization and documentation of the BEO, and the BEO signing the HW shipment manifest.

The BEO will determine appropriate waste pickup/shipment/disposal requirements for all HW. Waste pickup and disposal requirements at Keyport are documented on the Waste Disposal Request (WDR) form (*an example WDR form is included in Appendix A*). Contact the COR to schedule waste pickup/shipment/disposal through the BEO.

## **SOLID (NON-HAZARDOUS) WASTE MANAGEMENT**

The term “solid waste” is used to describe designated waste that is not “HW”, “PCB”, “Universal Waste”, or “Asbestos”. This term can include construction debris, liquids, and landfill controlled waste. Remember that all waste must be designated prior to removal from Keyport.

Solid waste shall be reported to the COR as required by contract submittals. The waste material must be identified along with whether it was reused, recycled, or disposed of, its solid waste tracking sheet (SWTS) serial number, its load numbers, and its weight. In addition, include government provided Waste Determination documentation that the waste was not HW (WDR).

### **Control and Management**

- Place solid waste in approved and labeled containers so that it is not stored on the ground.
- If recycling is an option for a waste stream, (e.g., asphalt, concrete, cardboard, scrap metals, and unpainted, untreated wood) keep it free from other types of waste.
- Keep solid waste accumulation area along with the surrounding area clean and free of debris.
- Liquids are not allowed in the dumpster or at the landfill. Containerize and recycle or dispose of them in accordance with applicable requirements.

### **Disposition**

- Be sure to empty containers no less than once per week unless the COR has approved a different schedule. Vehicles and haulers used for the transportation of solid waste shall be permitted, licensed, or otherwise approved, by the applicable County Health District(s).
- Ensure waste is not taken to any site that has not been approved by the COR prior to removal from the work site and contractors must be sure their drivers take the waste to a location the contractors specified to the government.
- Contractors are responsible to ensure no disposal action is taken which could be construed as illegal dumping.

**A cover must be in place over the waste while it is being transported**

## **RECYCLING**

**Waste Minimization** is one of Keyport’s top priorities. Recycling is one tool to help reduce the quantity of waste produced on base.

The contract will specify responsibilities and procedures for recyclable waste produced while working on base. If the contract does not specify or is unclear, immediately notify the COR.

It is important to note that in many instances where the Navy does not provide recycling services, the Navy may require monthly reports of what was recycled and what was wasted (land filled or disposed of as hazardous) within project contract submittals. If a Monthly Project Waste Summary Report (CMPWSR) is required by your contract, fill out the CMPWSR each month and turn the information in to the COR. If you have questions or concerns regarding recycling for your project, please request clarification from the COR.

Regulations vary on how waste must be managed prior to recycling, depending on the waste itself. The most common categories for recycling are:

(1) Specifically regulated recyclable materials. These are recyclable materials regulated under their own respective sections of Washington State Administrative Code (WAC) 173-303 (e.g., spent lead-acid batteries).

(2) Recyclable materials that are not regulated. These are materials that are not regulated prior to use or reuse (e.g. cardboard or paper).

(3) Recyclable materials that are fully regulated. These materials are fully regulated up to the point when they actually enter the recycling process that recycles the material (e.g. Chlorofluorocarbons (CFC) and anti-freeze).

Oftentimes, waste that is destined for recycling must still be controlled and managed as HW until the point at which the waste is reclaimed.

Kitsap County Public Works Solid Waste Division is an excellent resource for local recycling options and can provide guidance and information regarding Recycling resources within Kitsap County.

<http://recycle.kitsapgov.com/Pages/Home.aspx>

## **POLYCHLORINATED BIPHENYLS (PCBs)**

Since 1979, the Environmental Protection Agency regulates the use, storage, disposal, and distribution in commerce of PCBs. The law for PCBs is the Toxic Substance Control Act (TSCA). Common equipment containing PCB's includes electrical transformers and fluorescent light ballasts.

Light ballasts may or may not contain PCBs. If they are not labeled "No PCB" then they



are assumed to contain greater than 50 parts per million (ppm) PCB and are regulated under the TSCA. Transformers should be labeled identifying their PCB content. Discarded transformers, capacitors, or bushings containing PCBs at concentrations of 2 ppm or greater (except when drained of all free-flowing liquid) are regulated in Washington state as HW. Fluid, core, and core papers from these specific sources are also regulated in Washington as a HW when generated from the salvaging, rebuilding, or discarding of transformers, capacitors, or bushings.

Samples are required for materials that have been shown in the past to contain PCBs above the regulatory limit of 50 ppm. See Waste Management section for information on management requirements for PCB containing waste.

## **CLEAN WATER**

### **Drinking Water**

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Obtain a connection permit from the Naval Base Kitsap Public Works Department prior to making any connections or changes to the potable drinking water system. A connection permit is necessary even for small or temporary connections (e.g. connecting an ice machine, temporary connection to a fire hydrant, etc.).

- Call (360) 396-4060 to obtain a permit.
- Backflow Preventer need/size/type will be determined by the base water shop; only the water shop is authorized to make this decision.
- If making significant system changes (system extension, system improvement, capacity change, etc.) permission from the Department of Health may be required. Contact the COR immediately if significant water system changes may be required.

Decommissioned wells or geotechnical borings drilled for a project shall be in accordance with **MINIMUM STANDARDS FOR CONSTRUCTION AND MAINTENANCE OF WELLS** (WAC 173-160).

### **Stormwater**

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The purpose of storm drains is to prevent flooding by conveying stormwater runoff to saltwater or stormwater facilities. All discharges going directly into surface waters such as Liberty Bay, Hood Canal, or streams and wetlands are strictly controlled and no contaminants are authorized. Examples of prohibited discharges include all hazardous materials and wastes, petroleum products, solvents, detergents, wastewater, and contaminated ground water. Industrial wastewaters cannot be disposed of as stormwater and must be disposed of in accordance with hazardous waste regulations. Get approval for projects disturbing more than one acre before discharging any water anywhere!

**Information you will need to know about your project regarding stormwater control:**

- Will there be any ground disturbing activity? Make sure to include not only the footprint of the project, but also staging areas, temporary trailers, parking, retention ponds, etc.
- Will there be total ground disturbance greater than 1 acre?
- Does the slope exceed 35% at any point within the project or will any work within the footprint take place on known unstable soils?
- Will there be groundwater dewatering for foundations or other construction activity?
- Will any hazardous material, waste, demolition debris, soil, open or leaky dumpsters, or any other potential pollutant be exposed to stormwater?
- Is this a major renovation or construction project (> \$5 million if renovation, > \$750K if construction)? If yes, "Low Impact Development" (LID) must be considered in the design, or justification must be provided if LID is not utilized.
- Does the project add 2000 square feet or more of new impervious surface, convert 3/4 acre or more of native vegetation to landscaped area, or have land disturbing activities of 7000 square feet or more? If yes, have the 10 minimum requirements listed in Volume I of the Stormwater Management Manual for Western Washington been evaluated for applicability, and has a hydrologic analysis been conducted. Does the analysis indicate a requirement for flow control and/or runoff treatment structures? Are these structures included in the project footprint?
- Which water body will receive the project stormwater?

**Stormwater Pollution Prevention Plan**

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*Sites disturbing 1 Acre or More:*

A Stormwater Pollution Prevention Plan (SWPPP) must be completed by the Contractor and be approved by the COR prior to beginning construction activities. The SWPPP shall be prepared in accordance with the requirements outlined in the latest version of the Stormwater Management Manual for Western Washington, which can be found at the following link.

<http://www.ecy.wa.gov/programs/wq/stormwater/manual.html>

The SWPPP must be completed and approved prior to submitting the Notice of Intent (NOI) to EPA for the construction project. The NOI must be approved by EPA prior to commencing construction activities. Upon completion of construction, submit a Notice of Termination (NOT) to the EPA.

Sites disturbing under 1 Acre:

When a site covers less than one acre, a SWPPP, NOI, and NOT are unnecessary; instead, the contractor is required to submit a brief statement and receive approval by the BEO regarding adequate controls prior to construction activity. This statement shall include:

- Brief project description.
- Total acreage disturbed.
- Project supervisor and other points of contact.
- Project drainage information.
- Sequence of construction.
- Stormwater Best Management Practices (BMPs) that will be applied to the site.
- Site map showing where BMPs will be implemented.
- Description/checklist of weekly inspections.
- Hazardous materials handling and storage processes.
- Practices for exposed soil coverage (in compliance with the requirements of the Stormwater Management Manual for Western Washington).

Contact the BEO for questions regarding SWPPPs and environmental compliance.

**Worksite Cleanup:**

- Keep the work site clean to minimize loss of accumulated debris into the storm drains. When dirt, surplus materials, solid waste, and dropped materials are allowed to accumulate, these materials can be washed into the stormwater system when it rains.
- Conduct weekly cleanliness inspections of outdoor work and storage areas. Clean up work areas as necessary to maintain control of potential pollutants.

**Material Storage and Handling:**

- Handle and store materials using methods that reduce or eliminate exposure to rainfall.
- Minimize the potential for spills. Protect containers storing liquids (e.g. fuels, paints, and solvents, etc) from the weather, by placing inside a covered area (or under a tarp) in a secure location, away from storm drains. Proper protection methods require placing materials inside secondary containments. Use rubber mats over storm drains when loading and unloading supplies from trucks and trailers. Contractors are responsible for establishing the secondary containments if none exist. Secondary containment is an impervious basin compatible with all

materials stored in the basin, and large enough to contain 100% of the volume of the single largest container, or 25% of the volume of all containers stored. If the secondary containment is exposed to rain (i.e. uncovered), the containment must be able to hold 125% of the single largest container.

- If outdoor material storage is necessary, protect smaller parts, material, and containers from the weather by covering and placing them on pallets.

### **Drip Pans**

- When doing work where drips or leaks could occur, use drip pans, tarps, or other protective devices to prevent pollutants from reaching the ground.
- Use drip pans or other protective devices at hose connections while transferring oil, fuel, solvent, industrial wastewater, etc. Also, use drip pans when making or breaking hose connections. Where design constraints, vertical connections, or interferences do not allow use of drip pans, use other measures such as absorbent pads or chemical resistant drapes for protection.
- Immediately repair, replace, or isolate leaking connections, valves, pipes, hoses, and chutes carrying wastewater, fuel, oil, or other hazardous materials. Place drip pans under leaking connections before starting any corrective action.
- Do not leave drip pans out to collect stormwater when it rains.

### **Control of Dust and Overspray**

- Carry out any activity that generates pollutants (i.e., painting, welding) in enclosed, covered areas to the maximum extent practical.
- Perform spray paint operations in a way that contains the over spray and spillage and minimizes emissions of particulates. (Also see Air Pollution section of this document).
- During windy conditions, cease operations.

### **Preventative Maintenance**

- Regular preventative maintenance on vehicles and equipment will help prevent drips and leaks (which wash into storm drains when it rains).
- Inspect vehicles and equipment for leaks before use. Immediately stop all identified leaks.

### **Discharges into Storm Drains**

- Unless authorized in writing by the Contracting Officer with the approval of the BEO, do not discharge anything other than stormwater into the storm drains.

## **Dewatering**

- Special requirements apply to dewatering of excavations because some areas are contaminated due to past activities that took place at the site. The BEO can provide further guidance if dewatering is anticipated.

## **Equipment Cleaning**

- The preferred method is to arrange for cleaning of equipment off-station. If equipment must be cleaned immediately after use, never discharge rinsate directly into the storm drains or allow it to run into Liberty Bay, the Hood Canal, or any tributary. The BEO can provide additional guidance if any equipment cleaning is required.

## **Pressure Washing**

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Pressure washing requires special handling procedures to properly deal with wash water and prevent contaminants from entering storm drains. These procedures are identified in the Naval Base Kitsap (NBK) Keyport Pressure Washing Process for Buildings and Structures (Appendix B) and shall be implemented throughout the pressure washing process. As identified in Appendix B, pressure wash water must never be allowed to enter storm drains or surface waters.

Contact the BEO for additional guidance regarding pressure washing controls.

## **Wastewater and Sanitary Sewer Discharges**

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Keyport has a facility State Waste Discharge Permit (SWDP), which regulates facility wastewater discharges into the sanitary sewer system. Keyport's on-base sanitary sewer system connects to Kitsap County's system where the wastewater is treated at the Central Kitsap Publicly Owned Treatment Works (POTW), located in Brownsville, WA, prior to discharge to the Puget Sound. The permit is designed to protect both the capacity and the treatment capabilities of Kitsap County's public system.

All project connections to the Keyport sanitary sewer system require NBK Public Works department approval.

Connections or discharges to the system of industrial wastewater, which is considered to be any wastewater that is not sewage or common household gray water requires BEO approval prior to connection or discharge.

It is important to note that ALL- non-sewage or common household gray water discharges require BEO evaluation, due not only to potential pollutant content, but also due to capacity and turbidity considerations which could affect the Central Kitsap POTW. Common examples of project wastewater requiring evaluation includes but is not limited to; stormwater, project dewatering water, cooling water for equipment,

concrete wash water, and equipment and vehicle washing operations.

Request authorization from the BEO for project discharges to the sanitary sewer system in accordance with the Waste Determination (Designation) section of this guide, utilizing the Waste Generation Record (WGR) form. Guidance for proper disposal will be communicated in accordance with the Waste Pickup, Shipment, and Disposal section as documented in the Waste Disposal Request (WDR).

The project HW Site Manager/Alternate will be expected to fill out the WGR and WDR forms to the best of their knowledge and provide any information requested in order for the government to properly and accurately determine whether the wastewater can be discharged to the sanitary sewer system in accordance with the conditions of NUWC Division, Keyport's permit for discharge of wastewater to the sanitary sewer system.

**See Appendix A for:**

- Waste Generation Record (WGR)**
- Waste Disposal Request (WDR)**

All spills and releases from the sanitary sewer system and unauthorized discharges of Oil and Hazardous Substances (OHS), should be reported immediately in accordance with the Spill Event section of this guide.

## **CLEAN AIR**

Air pollution consists of airborne contaminants that can be injurious to human health, plant, or animal life, or which can unreasonably interfere with enjoyment of life and property. Common sources of air pollution at Naval Facilities includes but is not limited to:

- Combustion devices (boilers, diesel generators)
- Abrasive blasting, grinding, sanding, and welding
- Gasoline loading and dispensing
- Dust from construction/demolition
- Painting and solvent cleaning
- Equipment containing refrigerants, such as chillers, compressors, and condensers
- Odors, which interfere with human health, or enjoyment of life and property are regulated as air pollution.

Activities, which generate air pollution, are regulated within Kitsap County primarily by the Puget Sound Clean Air Agency (PSCAA). PSCAA is the local regulatory agency responsible for air pollution control in Kitsap, King, Pierce, and Snohomish Counties, including new construction or modification of air pollution sources, as well as all

asbestos, demolition, and renovation work.

PSCAA Regulations and Information website: <http://www.pscleanair.org/>

Keyport has a facility air permit issued by PSCAA. All activities taking place within the fenceline of the facility are subject to and must comply with the permit at all times, as well as complying with numerous individual equipment and process permits issued by PSCAA that regulate distinct air pollution generating processes or equipment at Keyport.

## **Refrigerants and Ozone Depleting Substances (ODS)**

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All projects involving equipment-containing refrigerants must comply with the requirements of 40 CFR 82 – Protection of Stratospheric Ozone.

Contractors performing work on refrigerant containing equipment are required to meet applicable EPA refrigerant technician certification standards.

Additionally, Keyport is required to maintain detailed facility records regarding installation, servicing, and maintenance of equipment at the facility that contains ozone-depleting refrigerants. If your project installs, removes, or maintains equipment that contains Ozone Depleting Substances (ODS), your company is required by law to supply records to the facility regarding the work done on that equipment. Records regarding installation, removal, and maintenance of equipment containing ODS should be submitted to the COR and BEO as a contract submittal.

## **Air Contaminant Generating Processes and Equipment (including Control Equipment)**

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Equipment that contributes to or controls air pollution may require Notification to or a Notice of Construction (NOC) Permit from the PSCAA to install, service, or operate. If the equipment does require a NOC Permit, special emission controls or features may be required as part of the design and will be a requirement to obtain the permit to establish or construct the equipment. Furthermore, some equipment that does not require NOC permitting from PSCAA is still subject to federal emission control requirements. Required emission controls on air pollution sources can change over time and are different for different parts of the United States.

It is unlawful to begin construction or establish a regulated air pollution source without meeting emission standards and obtaining the required permits. Additionally, equipment purchased or supplied that does not meet established emission standards is illegal to install and operate and would need to be replaced, thus incurring a liability and added cost for the government and the contractor.

No internal combustion or compression ignition engine may be used inside buildings or

any confined space unless specific provision is made to conduct exhaust gases to the outside air, or the area is adequately ventilated so as to prevent the accumulation of dangerous gases.

Contractor owned equipment that will be brought on site for work as part of the contract must be maintained in good working order per manufacturer's recommendations; contracting Officers may direct that defectively maintained equipment be secured until adequate repairs are completed.

If Clean Air Act permits are required, roles and responsibilities for obtaining permits must be addressed within the contract. If there is any question regarding whether project work requires a Clean Air Act permit or affects an existing clean air act permit, seek guidance from the COR and BEO.

### **Temporary Portable Non road Engines for Projects**

A Non road engine is an engine that, by itself or in or on a piece of equipment, is portable or transportable, meaning designed to be and capable of being carried or moved from one location to another. Characteristics of being portable includes, but is not limited to, wheels, skids, carrying handles, dolly, trailer, or platform. The most common type of facility equipment affected by non road engine rules is portable electrical generators used for temporary electrical power at a work site.

Washington State and PSCAA require advance notification for the operation of non-road engine(s) at a facility when the cumulative brake horsepower rating of non-road engine(s) utilized for a project exceeds 500 brake horsepower (bhp). The regulations also require advance notification and permit approval prior to the operation of non-road engine(s) at facility when the cumulative horsepower rating of non-road engine(s) utilized for a project at a facility exceeds 2000 bhp. In certain situations, a non-road engine permit may require restrictions to be placed on the operation of the engine(s).

Non-road engines that are exempt from the notification requirement:

(1) Engines that are in or on a piece of equipment that is self-propelled or serves a dual purpose by both propelling itself and performing another function.

(2) Engines that are in or on a piece of equipment that is intended to be propelled while performing its function.

(3) Projects utilizing non road engines with a cumulative (summation of all applicable project engines) less than 500 bhp.

(4) Common examples of exempt equipment include lawnmowers, string trimmers, portal cranes, and non-road construction equipment such as bulldozers, loaders, and trenchers.



A non-road engine notification must be submitted prior to bringing onsite any contractor owned or rented non road engine(s) meeting the requirements of PSCAA Regulation I, Article 15.

Provisions for compliance with PSCAA Regulation I, Article 15 non road engine requirements should be included in Contract submittals. Any required Notifications should be submitted to the COR and BEO.

## **Common Clean Air Act Concerns for Projects**

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PSCAA requires the use of Best Available Control Technology (BACT) to control fugitive emissions. Fugitive emissions are those emissions (e.g., dust, mist, vapors, fumes) not caught by a capture system. Depending on the project, BACT can be as simple as a light water spray or as complex as a manufactured containment. Some examples include:

- Performing spray-painting operations inside a spray enclosure equipped with an overspray emission collection device. When working outdoors a reasonable method of containment might be a tarp, shrink-wrap, or a mobile enclosure.
- Keep containers of paints or solvents closed unless they are in use.
- Control of dust from construction, road travel, renovation, demolition, sanding, grinding, concrete work, abrasive blasting, and clean-up work with a BACT such as water spray, enclosures, or specially designed control equipment.

Emissions from the exhaust of internal combustion or compression ignition engines can cause a unique problem for construction projects. PSCAA regulations require that the “opacity” (which is a visual measure of air contaminants contained within the exhaust) not exceed regulatory standards. The regulatory standard can be difficult for older or poorly maintained engines to meet. Internal combustion and compression ignition engines must be maintained in good working order to meet regulatory requirements. Contractors should be mindful of this requirement if planning to bring an older piece of equipment on base. **All internal combustion or compression ignition engines must operate in compliance with PSCAA visual emission standards at all times while operating on base.**

All air pollution source and control equipment brought to Keyport must be maintained in good working order and maintained per manufacturer’s recommendations. Contracting Officers may direct that defectively maintained equipment be secured until adequate repairs are completed.

## **ASBESTOS**

The government (owner) is responsible for identifying and disclosing the location and quantity of asbestos containing materials that will be removed or disturbed as part of a project. This action is done either in-house or by contract, and is often included as part of a Hazardous Material Survey conducted for the project. Contractors are responsible to ensure their employees and designated asbestos work areas comply with OSHA and PSCAA regulations during any Class I to Class IV asbestos work. PSCAA defines an asbestos project as any activity involving the abatement, renovation, demolition, removal, salvage, clean up, or disposal of Asbestos Containing Material (ACM).

Asbestos Workers, Supervisors, Inspectors, Project Designers shall be trained and certified as required by 29 CFR 1926.1101 or Washington State equivalent regulations, prior to commencing any asbestos contract work. Contractors performing maintenance and repairs, or providing janitorial services shall meet the minimum training requirements specified for Class III and Class IV asbestos associated tasks.

Asbestos removal projects involving quantities of materials that exceed 260 square feet, 160 linear feet or 35 cubic feet of ACM require a written “Asbestos Removal Plan” signed by a Certified Asbestos Project Designer. The removal plan shall include the written specifications provided by the government (Engineering Control of Asbestos Containing Materials Section 02-82-00). The Navy’s qualified person shall edit and/or approve the specifications provided by the government and review the contractors “Asbestos Removal Plan” for acceptance. The Puget Sound Clean Air Agency (PSCAA) website outlines detailed requirements for renovation/demolition notification (<http://www.pscleanair.org/regulated/asbestos/default.aspx>).

Submit notification for asbestos removal to PSCAA at least ten days prior to start of work for all renovation projects that involve asbestos and **for all demolition projects, whether or not asbestos is present**. Demolition projects require a comprehensive asbestos survey of the structure using destructive test methods; remove any detected ACM before the demolition commences to prevent release of fibers resulting from the demolition process. The approved notification (“permit” to disturb or remove asbestos or perform a demolition) must be in hand prior to work. Provide a copy of the approved notification to the COR, the Keyport Asbestos Program Manager, and the BEO prior to starting work.

Only a licensed hauler may transport Asbestos waste. Asbestos waste must be disposed of at a landfill permitted to receive asbestos waste.

Contractors will meet with the Asbestos Program Manager to review all work that involves the abatement of ACM or to review specific locations where potential disturbance may occur. Should any accidental disturbance or uncontrolled release of ACM occur, the contractor should immediately suspend operations and notify the COR who will contact the appropriate government personnel for technical guidance and/or site visit to assess and resolve such an incident.

## **DEMOLITION**

Demolition is defined as wrecking, razing, leveling, dismantling, or burning of a structure, making the structure permanently uninhabitable or unusable. If your project involves the demolition of a structure, it will require coordination with the BEO. Typical Environmental concerns regarding the demolition of a structure include the following:

### **Site Approvals and Environmental Considerations during Demolition Projects**

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#### Site Approval Environmental Considerations

- Coordinate removal of utility services through the Naval Base Kitsap Public Works Department. Private utilities to consider include cable, electricity, natural gas, water, sewage, telephone and steam.
- If the project has the possibility of impacting existing trees on site, the project should be coordinated with the Navy's Forestry representative (see Forestry Section).
- Precautions must be taken to ensure that runoff from the demolition construction site does not impact local water quality (see Stormwater Section).
- All Demolition waste materials must be designated and disposed of properly. Coordinate the Designation and disposal of waste materials with the BEO (see applicable Waste Sections).

### **Clean Air and Asbestos Considerations for Demolition Projects**

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- A whole-building Demolition Asbestos survey is required to identify any asbestos within a building prior to demolition. This survey might have been done previously as part of a separate contract or might be part of your contract. (see Asbestos Section). This is required to be done WHETHER OR NOT Asbestos is known or believed to be present.
- Puget Sound Clean Air Agency requirements for asbestos and demolition are detailed at the following website:  
*<http://www.pscleanair.org/business/Asbestos/Pages/default.aspx>*
- An Asbestos Work Plan is required if asbestos is present within a building to be demolished (see Asbestos Section). The asbestos must be properly abated prior to Demolition to ensure that no asbestos is inadvertently released during the Demolition process.
- Building HVAC equipment or Refrigerant in building HVAC systems must be removed in a way that will not cause the release of ODS to the environment (see Clean Air Section).

- Dust generated by the building demolition must be controlled so as not to create a nuisance dust issue; mitigation actions should be specified in project Submittals (see Clean Air Section).
- Demolition projects require a **ten day waiting period** and **Notification of the Puget Sound Clean Air Agency for EACH STRUCTURE to be demolished WHETHER or NOT ASBESTOS IS PRESENT in the structure to be demolished.** Submit copies of completed Notification form(s) to the COR prior to building demolition.

## **CONTAMINATED SITES**

There are a number of sites located at Keyport that are managed under the Navy's Installation Restoration Program (IRP), where underlying soils or groundwater is known to contain some level of contamination due to past activities that took place at or near the site.

The Navy's Installation Restoration Program (IRP) is responsible for investigating and cleaning up soil and groundwater contamination from past practices at Department of Defense sites. The Navy has developed Land Use Controls (LUCs) for these sites to ensure that human health and the environment are not impacted by the contamination known to be present in the soil and/or groundwater at these sites..

The location of and Land Use Controls (LUCs) that apply to each of the known areas of contaminated soil and groundwater at Keyport are detailed in Naval Base Kitsap Instruction 5090.15B, Land Use Controls at Naval Base Kitsap – Keyport. In general, the LUCs applicable at contaminated sites located at Keyport include:

- Maintain existing asphalt paving/site impermeable cover.
- Restrict use of site groundwater as a potable water supply.
- Restrict land use and other activities at the location that could result in soil or groundwater contact by implementing procedures to control activities that involve digging or construction that could cause exposures to contaminants in soil or groundwater. These restrictions are primarily controlled through the Public Works dig permit process. Note: There are instances where digging and construction activities (e.g., street and utilities improvement or maintenance) may take place on or through a contaminated site with little or no risk of concern, depending upon the type of work to be performed. In instances where soil or ground disturbing work must be conducted at these sites, the specific activities needing to be conducted must be evaluated and necessary preventative measures must be taken to protect workers against short-term and long-term health risks from contaminants.
- Restriction of facility access.

The dig permit process is used to control access to these contaminated sites and to ensure proper controls are implemented when work must be performed inside and around those areas. All soil or groundwater generated from within these areas must be disposed of off-base and cannot be reused at the site. Additionally, these areas cannot be used as material/equipment laydown areas, stockpile laydown areas, or project office areas without the approval of the Navy's Installation Restoration Manager.

## **EXCAVATIONS**

Major portions of the electrical, steam, water, sewage, communication, fiber-optic, and natural gas systems at Keyport are buried underground in locations shown only on "as built" drawings. Excavation prior to locating and marking buried systems can lead to costly outages and may cause serious injury. Therefore, all excavation requires review and approval through the base Dig Permit process.

### **Soil Handling Procedures**

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If a project requires excavation in an area of known contamination (e.g. an Installation Restoration site), handle the soil and excavation per Installation Restoration site requirements.

All excess soil generated during construction, maintenance and repair projects shall be handled, tested and disposed of in accordance with the "Soil Testing and Disposal Guidance" (Enclosure 1). If project soil meets the requirement of "Hazardous Waste", the project soil must be disposed of through the BEO in accordance with the "Hazardous Waste" section of this guide.

### **Site Approval and Environmental Considerations**

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Submit requests for excavation (dig) permits to the Naval Base Kitsap Public Works Department and receive approval well in advance of any planned excavation.

#### **Site Approval Environmental Considerations**

- If the project has the possibility of impacting existing trees on site, the project should be coordinated with the base's Forestry representative (see Forestry Section).
- Precautions must be taken to ensure that runoff from excavation does not impact local water quality (see Stormwater Section).
- Dewatering must be conducted in a manner to ensure protection of water quality (see Stormwater Section).

## **NATURAL RESOURCES**

Natural resources are comprised of the natural features located on the base, which includes but is not limited to soil, streams, water-bodies, animals, plants, and trees. The Navy is required to protect, preserve, and enhance these natural resources when at all possible.

Natural resource compliance requires steps be taken to ensure certain aspects of the natural environment are protected. There are many laws that regulate the Navy and those working under contract to the Navy, to protect and preserve natural features of the land and water. These laws include but are not limited to the Endangered Species Act, the Clean Water Act, and the Marine Mammal Protection Act. Presently, there are several species on the Threatened and Endangered Species list that are found on or around Keyport. Depending on the nature of the project, some restrictions may be imposed on the work being performed to protect these species. Most of these restrictions affect project timing and should not significantly affect the performance of the project. Contractors will be made aware of any restrictions or limitations in terms of threatened and endangered species when the project goes through Keyport's project review cycle.

### **Forestry**

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If a project impacts forest products (e.g. trees, firewood, seedlings, vegetation, etc.), consult the BEO well in advance of operations. Planned removal of any forest product requires field review, appraisal, or permit. Often payment for commercial forest products is required from the construction contractor prior to the execution of work.

No Trees may be removed without prior consultation and approval from the Navy Forester.

Project information you will need to discuss with a Navy Forester to ensure that your project complies with forestry laws and regulations:

- Are there trees with a diameter of 8 inches or greater (measured at 4.5 feet above the ground) that are planned for removal?
- Will the project disturb other forest products? (In addition to the project area consider the need for equipment lay down areas, contractor trailer sites, retention ponds, auxiliary power placement, etc.)
- Is tree or vegetation removal required beyond the final project footprint?
- Are there dead, damaged, or defective trees that pose a safety hazard to the work area that may need removal?
- Are there invasive species (Scotch broom, Japanese knotweed, Butterfly bush, Reed canary grass, etc.) in the project area? Could project actions potentially

spread invasive species (consider equipment moving seed to other sites, vegetative debris disposal methods, and vegetative debris disposal locations)?

- Will project implementation use non-native species in landscape design?
- Will there be any firewood present on site that workers are interested in purchasing?

Contact the COR and BEO for questions regarding compliance with requirements associated with forest products.

## **CULTURAL RESOURCES**

Cultural Resources are comprised of both Historic and Archaeological resources. Historic resources are items such as buildings, monuments and structures.

Archaeological resources are items such as sacred places, ruins, remnants of past historic or prehistoric civilizations, and buried or discarded artifacts, including human remains. These resources are often important because they hold some significant cultural or historical significance to the history of our nation.

Cultural resource compliance requires the protection and preservation of significant cultural resources. At Keyport, most of the cultural resources are historic in nature. These resources are the buildings and quarters on base identified as being eligible for listing on the National Register of Historic Places. While archeological artifacts are uncommon at Keyport, project construction involving trenching and excavation has the potential to unearth unknown, subsurface archaeological resources. If archeological artifacts are discovered during a project, the law requires that any work, which could further damage the archeological site, must be stopped and the Contracting Officer and BEO must be notified immediately. Intentional disturbance of archeological sites or removal of artifacts from Federal property is subject to criminal and civil penalties under Federal law. If a proposed project disturbs or may disturb cultural resources or archeological artifacts, investigation of the site and possible impact will require formal consultation with the State Historic Preservation Office in coordination with the National Environmental Protection Act.

## **APPENDIX A- EXAMPLE FORMS**

Note- Forms listed in Appendix A are Examples provided for training and background and are not maintained up to date. Current up-to-date versions of Submittal forms should be obtained from the COR and/or BEO.

### Example Forms

1. Contractor Hazardous Material Inventory (CHMI)
2. Waste Generation Record (WGR)
3. Site Registration Form
4. Waste Disposal Request (WDR)



## Contractor Hazardous Material Inventory (CHMI)

NUWCDIVKPTINST-5090.3

### Contractor Hazardous Material Inventory

Please submit this form and corresponding SDSs to [KYPT\\_WA\\_Code102HazmatSupport@navy.mil](mailto:KYPT_WA_Code102HazmatSupport@navy.mil) prior to the start of work. Keyport Environmental and Safety will review the listed materials for prohibited chemicals and potential exposure hazards related to Keyport Employees. Contractors are responsible for their own safety and should consult with their own safety personnel prior to using hazardous materials.

**PROJECT-ID:** → Click or tap here to enter text.

**DATE(S)-OF-PROJECT:** → Click or tap here to enter text.

**COMPANY:** → Click or tap here to enter text.

**POINT-OF-CONTACT:** → Click or tap here to enter text.

| Material(s)-Used: |              |             |                   |                   |                      |
|-------------------|--------------|-------------|-------------------|-------------------|----------------------|
| Material-Name     | Manufacturer | Part-Number | Quantities        |                   |                      |
|                   |              |             | Average-Daily-Use | Maximum-Daily-Use | Estimated-Annual-Use |
|                   |              |             |                   |                   |                      |
|                   |              |             |                   |                   |                      |
|                   |              |             |                   |                   |                      |
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## Waste Generation Record (WGR)

| WASTE GENERATION RECORD (WGR)  |             |                              |   |         |                                   |
|--|-------------|------------------------------|---|---------|-----------------------------------|
| <b>WASTE GENERATION RECORD</b><br><small>Return completed form to Waste Operations, Bldg. 1051. For assistance call ext. 6-7991 or 6-2320.</small>   |             |                              |   |         |                                   |
| GENERATOR'S NAME   |             | CODE                         | BUILDING  | PHONE # |                                   |
| SITE MANAGER'S NAME  |             | CODE                         | BUILDING  | PHONE # |                                   |
| GENERATION SITE  |             | COLLECTION SITE              |   |         |                                   |
| <b>WASTE</b>   |             |                              |   |         |                                   |
| WASTE NAME:  |             |                              | SDS #s:   |         |                                   |
| CONTAINER TYPE:  |             |                              | CONTAINER SIZE:   |         |                                   |
| <input type="checkbox"/> Original Manufacturer's Container<br><input type="checkbox"/> Aerosol<br><input type="checkbox"/> Gas, Propane, Oxygen Etc. Tank – List dimensions here:<br><input type="checkbox"/> Other Container -Explain:<br><input type="checkbox"/> No Container -Explain:   |             |                              | <input type="checkbox"/> < or = 5 gallon<br><input type="checkbox"/> > 5 gallon |         |                                   |
| PROCESS GENERATING WASTE:  |             |                              |   |         |                                   |
| <input type="checkbox"/> Non-Process, Expired Shelf Life <input type="checkbox"/> Other Process (Describe process <u>in detail</u> here):<br><input type="checkbox"/> Non-Process, Excess Material<br><input type="checkbox"/> Non-Process, Spill Clean-Up<br><input type="checkbox"/> Non-Process, Mid-Night Dump<br><input type="checkbox"/> Non-Process, Asbestos Removal |             |                              |   |         |                                   |
| <b>COMPOSITION</b>   |             |                              |   | %       | This Column<br>B.1061<br>Use Only |
| (MUST total 100% of your waste stream)   |             |                              |   |         |                                   |
| <input type="checkbox"/> Pure Product SDS #  |             |                              |   | 100%    |                                   |
| <input type="checkbox"/> Process Product (Must total 100% of your waste, list details below)   |             |                              |   |         |                                   |
| SDS#   |             |                              |   | %       |                                   |
| SDS#   |             |                              |   | %       |                                   |
| SDS#   |             |                              |   | %       |                                   |
| SDS#   |             |                              |   | %       |                                   |
| SDS#   |             |                              |   | %       |                                   |
| SDS#   |             |                              |   | %       |                                   |
| Debris (be specific):  |             |                              |   | %       |                                   |
| Debris (be specific):  |             |                              |   | %       |                                   |
| Water  |             |                              |   | %       |                                   |
|  |             |                              |   | %       |                                   |
| <b>PHYSICAL PROPERTIES</b>   |             |                              |   |         |                                   |
| pH:  | FLASHPOINT: | SPECIFIC GRAVITY or DENSITY: | PHYSICAL STATE:   | COLOR:  | LAYERS:                           |
|  |             |                              |   |         |                                   |
| <b>WASTE OPERATIONS BLDG 1051 USE ONLY BELOW THIS LINE</b>   |             |                              |   |         |                                   |
| WIT#   |             | WGR#                         |   | DATE:   |                                   |
|  |             |                              |   |         |                                   |

## Site Registration Form

### HAZARDOUS WASTE STORAGE SITE REGISTRATION



#### LOCATION

FLOOR:   
LOCATION:   
Site Type:

QUADRANT:

#### MANAGER / ALTERNATE

Manager:   
Bldg.:

Code:

Phone#:

Alternate:   
Bldg.:

Code:

Phone#:

#### ACCUMULATION

Maximum anticipated accumulation of waste during any two week period:   
(10 working days).

Volume:  (gallons or cubic feet)  
Weight:  (pounds)

RETURN COMPLETED FORM TO WASTE OPERATIONS, BLDG. 1051  
FOR ASSISTANCE CONTACT WASTE OPERATIONS AT (360)396-2320 or (360)396-7991.

FOR WASTE OPERATIONS AT BLDG. 1051 USE ONLY

Less than ninety day storage site ()

Satellite storage site ()

Hazardous waste accumulation site ID number:



Figure 4 – Waste Disposal Form (WDR)

| WASTE DISPOSAL REQUEST   |                                 |                      |
|--|---------------------------------|----------------------|
| WIT: 10798   |                                 |                      |
| WASTE: EN-7 CURATIVE PART B (ELANTAS) HFCNPT   |                                 |                      |
| WGR Number: 40976  |                                 |                      |
| <b>*** Pickup Requested ***</b>  |                                 |                      |
| Phone 6-2320 to request waste pickup   | Date: _____                     | Time: _____          |
| Person contacted: _____  |                                 |                      |
| <b>*** Split Breakdown ***</b>   |                                 |                      |
| <b>*** Manager ***</b>   |                                 |                      |
| SiteID: K00XX-XX   | Site Manager: SITE MANAGER NAME | Phone: 360-396-xxxx  |
|  | Alternate: SITE ALTERNATE NAME  | Phone: 360-315-xxxx  |
| <b>*** Generator ***</b>   |                                 |                      |
| Generator: GENERATOR NAME  |                                 |                      |
| Building: _____  | Code: 30                        | Phone: 315-xxxx      |
| <b>*** Certification ***</b>   |                                 |                      |
| I certify that the materials listed herein are the only compounds in the waste containers listed above and have not been mixed with any other materials to the best of my knowledge. |                                 |                      |
| Generator's Signature: _____   |                                 | Date: _____          |
| <b>*** Label ***</b>   |                                 |                      |
| DOT Shipping Name: MATERIAL NOT REGULATED BY DOT (WASHINGTON STATE DANGEROUS WASTE ONLY, TOXIC)  |                                 |                      |
| Hazard Class: STATE REGULATED  |                                 | UN/NA: _____         |
| DWN #'s: WP01 WT02   |                                 | WDOE Design: EHW     |
| DOT Major Risk Label(s): H/W MARKER, TOXIC   |                                 | Packing Group: _____ |
| Special markings: TSD: ACCUMULATE  |                                 |                      |
| <b>MARK ACCUMULATION START DATE WHEN WASTE FIRST ENTERS CONTAINER</b>  |                                 |                      |
| <b>*** Handling Information ***</b>  |                                 |                      |
| Physical State: LIQUID   | Container Type: _____           |                      |
| Accumulation Start Date: _____   | Container Size: _____           |                      |
| <b>*** Waste Operations (Bldg. 1051) use only below***</b>   |                                 |                      |
| Log In Number: _____   | Weight (lbs): _____             | Volume (gal): _____  |
| Consolidation: _____   | Storage: _____                  | Treatment: _____     |
| Signature: _____   | TSDF Start Date: _____          |                      |
| Logged on computer: _____  | Date: _____                     |                      |

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## **APPENDIX B**

### **SOIL TESTING AND DISPOSAL GUIDANCE**

Ref: (a) Washington Administrative Code (WAC) 173-303, Dangerous Waste Regulations

(b) WAC 173-350 Solid Waste Handling Standards

(c) WAC 173-340, Table 740-1 Unrestricted Land Use Soil Cleanup Standards

1. Purpose. To establish policy and procedures for controlling soil disturbed during construction, maintenance and repair projects.
2. Scope. This guidance applies to all construction and repair activities performed at Naval Base Kitsap Bangor, Naval Base Kitsap Keyport, Zelatched Point, Jackson Park, Naval Hospital Bremerton, Camp Wesley Harris and Naval Magazine Indian Island, including all tenant activities within the fence lines.
3. Policy. Soil shall be segregated, stored and tested depending on the intent for reuse on site or disposal off the installation.
  - a. Soil storage area(s) should be created in the following manner:
    - (1) Underlay the soil accumulation area with a continuous impervious sheet of plastic. Protect the plastic from perforation during loading and handling operations. The thickness of the plastic shall be sufficient to contain the soil, and in no case be less than 10-mil.
    - (2) Install an impervious continuous sheet of plastic, 10-mil minimum thickness, over the pile and secure the top cover sheet to ensure wind does not blow it off or to the side, leaving the soil exposed.
    - (3) The soil shall remain covered and secured except when actually adding or removing soil, or collecting soil samples.
    - (4) Signage with Contractor's name, identification of where the soil came from, and the name and phone number of the government project manager assigned to the project.
  - b. Soil intended for reuse at the same worksite shall be accumulated in the area from which it was removed, preferably as near to the excavation as practicable.
  - c. Soil not intended for reuse at the same worksite shall be considered a waste, and a Waste Information Specification (WIS)/ Waste Generation Record (WGR) shall be submitted to the BEO. The soil shall be characterized and disposed per Tables 1 and 2 below.
    - (1) All tests will be required unless specifically indicated by BEO. The cost of analytical testing shall be borne by the project.
    - (2) A sampling plan must be submitted to and approved by the BEO prior to sampling.
    - (3) All analytical results shall be submitted to the BEO along with the WIS/WGR for review and designation.

- (4) No soils shall leave the installation without an approved WIS/WGR.
- (5) All manifests for soil disposal shall be submitted for approval to the BEO. Copies of manifests or bills of lading shall be provided to the BEO after disposal.
- (6) There are no soil disposal sites on the installations.

**TABLE 1. TESTS REQUIRED FOR CHARACTERIZATION<sup>1</sup>**

|   |
|---|
| Total Metals by SW 846 EPA Methods 6010C and 7470A <sup>2</sup> |
| VOCs by SW 846 EPA Method 8260C                                 |
| SVOCs by SW 846 EPA Method 8270D                                |
| NWTPH – HClD, Gx, Dx (dependent on suspected contamination)     |
| PAHs by SW 846 EPA Method 8270D                                 |
| PCB/Pesticides by SW 846 EPA Method 8082A/8081B                 |

- 1. Additional testing may be required by the BEO per the contract.
- 2. BEO may require the use of TCLP metals (8 RCRA metals by SW 846 EPA Method 1311) for designation of waste.

**TABLE 2. WASTE DISPOSAL INFORMATION**

| Soil Designation  | Disposal Location   |
|---|---|
| Hazardous waste soil.   | Subtitle C Landfill.  |
| Non-hazardous soil that exceeds any of the above characterization criteria.         | Subtitle D Landfill.  |
| Non-hazardous soil that does not exceed any of the above characterization criteria. | Project manager discretion after approval from BEO <sup>1</sup> .         |
| Soil located in a designated CERCLA Installation Restoration (IR) program site.     | Subtitle C or D Landfill after approval from Remediation Project Manager. |

- 1. Prior to approving the WIS/WGR, the BEO will submit analytical results to the appropriate permitting agency (typically the County Health Department) to verify the proposed disposal location may receive the excess soil.

**Note:** This document is provided for general awareness only. It remains the contractor's duty to comply with all applicable laws, and this guide alone cannot assure such compliance. To the extent the requirements of this document are in conflict with the contract specifications, the contract specifications control. If the contractor believes this guidance conflicts with the specifications, the issue should be discussed with the Contracting Officer.

## **APPENDIX C**

### **Naval Base Kitsap (NBK) Keyport Pressure Washing Process for Buildings and Structures**

#### **1. Purpose and Scope.**

To establish a process for pressure washing of buildings and structures at NBK Keyport. In order to ensure accurate bidding, it is recommended that government project managers evaluate the feasibility of on-site infiltration for their specific project prior to contract award. If the building substrate includes asbestos containing material (ACM), the project manager shall consult the Asbestos Program Manager for potential additional requirements prior to contract award.

#### **2. Policy.**

Only clean potable water may be used for structure pressure washing (e.g. no chemicals, no detergents). Machines shall utilize manufacturer recommended settings, not to exceed 2,000 psi, to preclude damage to the structure substrate material. Evaporation and percolation of the used wash water into the surrounding soil is preferred over collection/disposal, when feasible. Pressure washing on a dry day is desirable to aid in evaporation/percolation.

Onsite evaporation/complete infiltration of wash water into nearby soil is permitted in situations where the wash water can completely infiltrate into the onsite soil and will not enter any nearby storm drain, ditch, stream channel or wetland. If onsite soil infiltration is not feasible due to building location or local topography, water shall be captured and disposed in accordance with Waste Information Specification (WIS)/Waste Disposal Request (WDR) instructions.

#### **3. Contractor Procedures.**

The contractor shall utilize filter fabric (5 micron if Asbestos Containing Material (ACM) is also suspected) to capture paint chips/particles produced. All filter fabric, paint chips, and particles produced shall be captured and disposed in accordance with NUWC Division, Keyport Waste Disposal Request (WDR) instructions. Testing is not required for the purpose of waste characterization. All of the above shall be assumed to be hazardous waste, unless the government has data to determine that the structure's surface is free of dangerous metals and/or ACM. The contractor shall document the procedure for the selected disposition method within the project Environmental Protection Plan (EPP), which shall be reviewed and approved by the government prior to work commencing.

#### **4. Compliance.**

During work performance, the contractor and government shall inspect the work site to

ensure that planned controls are adequate. Any deficiencies shall be addressed as specified by the government. If infiltration proves to be unacceptable during project execution, the water shall be captured/disposed.