

# **Hazardous Waste Management Plan**

**Joint Base Elmendorf-Richardson**



February 23, 2023

United States Air Force

673 Civil Engineer Squadron/Environmental Compliance

724 Quartermaster Road

Joint Base Elmendorf-Richardson, Alaska 99505

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## **ABOUT THIS PLAN**

This installation-specific Environmental Management Plan (EMP) uses the U.S. Air Force's (AF) standardized Hazardous Waste Management (HWMP) template. This plan is not an inventory of all hazardous waste (HW) requirements and practices. Where applicable, external resources and associated document links, including Air Force Instructions (AFIs); Air Force Manuals (AFMANs); AF Playbooks; and federal, state, local, and permit requirements, are referenced to ensure current content.

Each section of this plan begins with the standard language that addresses AF and Department of Defense (DoD) policy and federal requirements. The standard language is restricted from editing to ensure consistent application across the AF enterprise. Standard language is maintained by the Air Force Civil Engineer Center (AFCEC) designated Subject Matter Expert (SME) for this plan.

Immediately following the standard text are installation-specific sections that address state, local, and installation-specific requirements and processes. Installation sections are maintained and updated by the installation HW Program Manager and/or AFCEC Section appointed to support the section.

This document is optimized to be accessed and view electronically on the installation and AF eDASH website, the primary communication tool for AF EMPs.

## **DOCUMENT CONTROL**

### ***Standardized HWMP Template***

In accordance with (IAW) the AFCEC Environmental (CZ) Business Rule (BR) 08, *EMP Review, Update, and Maintenance*, the standard content in this HWMP template is reviewed periodically, updated as appropriate, and approved by the HW SME.

This version of the template is current as of 05/06/2021 and supersedes the 2018 version.

*NOTE:* When installations update their HWMPs, installations should adopt the most recent version of this template available. Installations are not required to change HWMPs after template updates.

### ***Installation HWMP***

The initial HWMP must be approved and signed by the Installation Commander (at the time of publication) as the legal HW Generator for the Environmental Protection Agency (EPA) ID assigned to this installation. The approval can be via signature or as documented in appropriate Environment, Safety, and Occupational Health Council (ESOHC) minutes (AFMAN 32-7002, 5.2.2.). *NOTE:* This is not a Wing Contingency Plan and is not governed by installation or Wing plans or readiness format or coordination requirements of AFI 10-401, Air Force Operations Planning and Execution. It is governed by AFMAN 32-7002, Environmental Compliance and Pollution Prevention, Section 5.2. Hazardous Waste Management Plan (HWMP). Because this is

not a contingency plan, coordination should be with EMS CFT and applicable units with roles and responsibilities in the HWMP. The plan does not require a new signature after each change in wing command.

**Record of Updates** – The HWMP is updated as changes to waste generation and management practices occur, including those driven by changes in applicable regulations and approved by the installation HW Program Manager as the plan Office of Primary Responsibility (OPR). Formatting and administrative changes such as the incorporation of updated regulatory language, or other minor updates are documented below.

**Record of Annual Review** – IAW AFMAN 32-7002, this plan is reviewed annually by the EMS CFT. Formatting and administrative changes should be noted in the previous paragraph for record of updates as approved by the EMS CFT Chair and do not require Installation Commander or Environmental, Safety, and Occupational Health Council (ESOHHC) approval. Substantive revisions require coordination and approval by the Installation Commander as determined by the EMS CFT Chair and/or IAW host installation procedures. Substantive changes include manpower or resource requirements changes that impact installation hazardous waste generating organizations.

**Record of Updates**

Change No.	Nature of Change	Date of Change	Approved By:
1	Change to accommodate AFMAN 32-7002, minor grammar, personnel changes, management of aerosol cans as universal waste, and waste accumulation in administrative facilities.	April 28, 2021	673 ABW/CC
2	Transfers HWMP to approved U.S. Air Force template. Defines universal waste roles and responsibilities for: Universal Waste Program Manager; Waste Managers; Facility Managers; and non-delegated points-of-contact. Defines training and inspection requirements. Defines universal waste container management processes. Updated Hazardous Waste Management Plan points-of-contact.	April 12, 2022	Environmental, Safety, and Occupational Health Council
	Changes include removing the minimum rank requirement for Alternate Hazardous Waste Managers, eradicating verbiage specific to TSDF		

3	<p>operations, identifying the Hazardous Waste Program Manager as a key person with specific roles and responsibilities, reorganizing installation-specific training information, updating existing appendices and introducing two new appendices, and revising verbiage throughout the environmental management plan to create uniformity and clarity.</p>	February 23, 2023	<p>Environmental Management System Cross Function Team</p>

**Record of EMS CFT Annual Review**

<b>Review Date</b>	<b>EMS CFT Chair</b>	<b>Notes/Remarks</b>
March 23, 2022	Mr. Mike Schmidt	Hazardous Waste Management Plan to be presented to Environmental, Safety, and Occupational Health Council for approval.
February 23, 2023	Dr. Mark Prieksat	Minor Hazardous Waste Management Plan revisions approved by the Environmental Management Plan Cross Functional Team.

# **1 OVERVIEW AND SCOPE**

This HWMP contains procedures for management of HW. In lieu of federal, or state requirements, AFMAN 32-7002, acts as the main driver for the HWMP. The HW Playbook serves as a supplemental guidance to this plan. Where applicable, DoD, AF, and Federal Resource Conservation and Recovery Act (RCRA) requirements are included. Each installation must include supplements as warranted to address applicable State and/or local requirements/procedures.

Joint Base Elmendorf-Richardson (JBER) is a large quantity generator (LQG) of HW as defined by the Code of Federal Regulations (CFR), Title 40, Chapter 1, Subchapter I, Part 260, Subpart B, Section 260.10. There are approximately 260 HW satellite accumulation areas (SAAs) regulated in accordance with 40 CFR § 262.15, and one or more central accumulation areas (CAAs) regulated in accordance with 40 CFR § 262.17. In addition, there are hundreds of universal waste accumulation areas (UWAAs) as well as accumulation areas for regulated recyclables such as used oil and mixed fuels. Appendix E – Base Map, depicts SAA and CAA locations throughout JBER. The number of SAAs and CAAs will change as the type and volume of waste and material fluctuates due to JBER’s unique mission requirements. Current information about SAAs may be viewed in the Enterprise Environment, Safety and Occupational Health – Management Information System (EESOH-MIS). JBER is responsible for all hazardous waste management activities that occur on JBER.

All organizations that generate waste in industrial facilities are required to have a Primary and Alternate Hazardous Waste Manager, regardless of whether the organization knowingly generates waste or believes it will not generate hazardous or universal waste.

Commanders/leaders must appoint Primary and Alternate Hazardous Waste Managers in accordance with Appendix H – Appointment and Training of Primary and Alternate Hazardous Waste Managers.

The Hazardous Waste Program Manager, within the 673d Civil Engineer Squadron/Environmental Compliance Section (673 CES/CEIEC), is responsible for oversight and support of all hazardous waste management activities and has authority for interpreting requirements of this environmental management plan as well as all applicable regulations. The office of the Hazardous Waste Program Manager is located at 724 Quartermaster Road, as depicted within Appendix E – Base Map. Contact information for the Hazardous Waste Program Manager and others located within Appendix M – Points of Contact.

The goals of JBER’s HW program are to:

- Protect all personnel on JBER;
- Comply with applicable instructions, statutes, and regulations;
- Support the JBER mission; and
- Reduce cost and risk when practicable.

## 2 INSTALLATION PROFILE

Table 2-1: Installation Profile.

<b>Scope of Plan</b>	This environmental management plan applies to all military, civilian, and contractor personnel working aboard JBER. All personnel, regardless of status (temporary or permanent) are required to comply with this environmental management plan.
<b>OPR (Civil Engineer or other designated office)</b>	673 CES/CEIEC has overall responsibility for implementing this environmental management plan and is the primary organization for monitoring compliance with applicable federal, state, and local regulations.
<b>HW Program Manager</b>	M. Alex Cierlitsky 673 CES/CEIEC matthew.cierlitsky@us.af.mil (907) 384-3322
<b>Alternate HW Program Manager</b>	Kim Pergola 673 CES/CEIEC kimberly.pergola.1@us.af.mil (907) 384-3419
<b>Emergency Contacts</b>	In the event of a spill, fire, or explosion involving hazardous waste, dial 911 and indicate the incident is on JBER. JBER-specific spill reporting procedures are outlined within Appendix S – JBER Spill Response Poster. The first person to observe a spill will complete the checklist shown in Appendix O – Checklist for the First Person Observing a Spill. For additional contact information, please see Appendix M – Points of Contact.
<b>Waste Registration Numbers</b>	EPA ID Number: AK8570028649
<b>HW Generator Status</b>	Large quantity generator.
<b>Universal Waste Handler Status</b>	Large quantity handler.
<b>Permitted HW Operations</b>	RCRA permit renewal application submitted to address hazardous waste activities at a former open burn/open detonation pad, the central accumulation area, satellite accumulation areas, and solid waste management units.
<b>Federal Regulatory References</b>	40 CFR Parts 260-279 40 CFR Part 761

	49 CFR Parts 171-185
<b>State and Local Regulatory Agencies</b>	The State of Alaska adopted by reference, the federal Hazardous Waste Regulations as outlined within Title 18 Alaska Administrative Code (AAC), Chapter 62 – Hazardous Waste (18 AAC § 62). Therefore, the Alaska Department of Environmental Conservation (ADEC) does not have an EPA-authorized hazardous waste program.
<b>State and Local Regulatory References</b>	18 AAC § 62
<b>DLA-DS area office and/or approved HW disposal contractors</b>	<p>The Defense Logistics Agency Disposition Services (DLA-DS) Anchorage office provides local area support to JBER. Active DLADS recycle and waste disposal contracts are listed below.</p> <p><u>Hazardous Waste Service Contract</u>  Contract Number: SP450020D0015  Active Dates: April 2020-April 2025  Contract managed by DLA-DS for the transportation and disposal of hazardous waste, universal waste, and non-hazardous waste.</p> <p><u>Mixed Fuels Sales Contract</u>  Contract Number: 4000880122  Active Dates: November 2020-November 2023  Contract managed by DLA-DS for the transportation and recycling of mixed fuels.</p> <p><u>Lead Acid Battery Sales Contract</u>  Contract Number: 4001069774  Quantity: 375,000 Lbs.  Contract managed by DLA-DS for the transportation and recycling of lead acid batteries.</p>
<b>HW Accumulation Sites</b>	<p>JBER operates one CAA located at Building 4314. If mission requirements dictate, JBER may operate a second CAA at Building 45-133.</p> <p>There is approximately 260 SAAs and hundreds of UWAAAs throughout JBER.</p>

	Current SAA and UWAA information is maintained in EESOH-MIS.
<b>HW Accumulation Time Limits</b>	SAAs: Unlimited (as long as the volume of waste does not exceed the limits outlined within 40 CFR 262.15).  CAA: 90-calendar days.
<b>HW Generator Reporting Frequencies</b>	Every 2-years during Biennial hazardous waste reporting (no later than 1 March of each even-numbered year).

### **3 ENVIRONMENTAL MANAGEMENT SYSTEM**

The AF adheres to the EMS framework and its Plan, Do, Check, Act cycle for ensuring mission success. Executive Order (EO) 13990, Climate Crisis; Efforts to Protect Public Health and Environment and Restore Science, U.S. Department of Defense Instruction (DoDI) 4715.17, Environmental Management Systems, AFI 32-7001, Environmental Management, and International Organization for Standardization (ISO) 14001, Environmental management systems - Requirements with guidance for use, provide guidance on how environmental programs should be established, implemented, and maintained to operate under the EMS framework.

The HW management program employs EMS-based processes to achieve compliance with all legal obligations and current policy drivers, effectively manage associated risks, and instill a culture of continuous improvement. The HWMP serves as an administrative operational control that defines compliance-related activities and processes.

Environmental Action Plans (EAPs) are developed and maintained as part of the overall EMS on eDASH. EAPs are tools that translate environmental requirements and targets into actionable plans for the HWPM and responsible personnel. HW requirements should be incorporated in installation EAPs to record monitoring and conformance for inspections and audits.

## **4 ROLES AND RESPONSIBILITIES**

The major roles/organizations involved in supporting the HW program include:

- Wing/Installation Commander;
- ESOHC;
- HW Program Manager/Alternate(s);
- Shop/HW Generator Personnel;
- Satellite Accumulation Area (SAA) and Central Accumulation Area (CAA) Supervisors/Managers;
- Unit Commanders;
- Unit Environmental Coordinators (UECs), see AFI 32-7001 for role description;
- Contracting Officer;
- Defense Logistics Agency Disposition Services;
- Tenant organizations; and
- AFCEC.

Detailed information about typical responsibilities for these and other roles is available in AFM 32-7002, applicable installation supplements, and the HW Playbook. This plan implements these responsibilities for this installation. Additional HW management-related roles and responsibilities are described throughout this plan and in referenced documents.

### **4.1 INSTALLATION SUPPLEMENT – GENERAL ROLES AND RESPONSIBILITIES**

Numerous personnel throughout JBER work in support of this environmental program. These key personnel include the 673d Civil Engineer Squadron/Environmental Quality (673 CES/CEIE) section, Hazardous Waste Program Manager, Universal Waste Program Manager, CAA operators, commanders/leaders of generating activities, Unit Environmental Coordinators, Primary and Alternate Hazardous Waste Managers, and Facility Managers. The roles and responsibilities for each of these key personnel are identified below.

#### **4.1.1 HAZARDOUS WASTE PROGRAM MANAGER**

The Hazardous Waste Program Manager, within the 673d Civil Engineer Squadron/Environmental Compliance (673 CES/CEIEC) section, is responsible for providing oversight and support for hazardous and other regulated waste management activities on JBER. The office of the Hazardous Waste Program Manager is located at 724 Quartermaster Road, as depicted within Appendix E – Base Map. Contact information for the Hazardous Waste Program Manager is located within Appendix M – Points of Contact and Table 2-1: Installation Profile. The Hazardous Waste Program Manager:

- Oversees the centralized management of all HW generated on JBER;
- Ensures all hazardous and other regulated wastes generated on JBER are recycled or disposed of in accordance with local, state, and federal regulations;
- Updates the Hazardous Waste Management Plan and establishes specific waste management procedures;
- Interfaces with regulators, stakeholders, ESOHC members, Environmental Management System Cross Functional Team (EMS-CFT) members, Hazardous Material Management Plan (HMMP) Team members, environmental program managers, and generators;
- Tracks programming and execution of HW requirements; and
- Provides accurate information within environmental reports by safeguarding HW records.

#### **4.1.2 UNIVERSAL WASTE PROGRAM MANAGER**

The Universal Waste Program manager, within 673 CES/CEIEC, is responsible for providing oversight and support for all universal waste (UW) management activities on JBER. The office of the Universal Waste Program Manager is located at 724 Quartermaster Road, as depicted in within Appendix E – Base Map. Contact information for the Universal Waste Program Manager is located within Appendix M – Points of Contact. In addition to any specific compliance responsibilities that are specified throughout this environmental management plan, the Universal Waste Program Manager:

- Issues UW containers with labels to UWAAAs that are not located at an SAA;
- Tracks UW containers issued to UWAAAs that are not located at an SAA;
- Provides UW one-on-one training, as necessary;
- Tracks UW training for Facility Managers and non-delegated UW points of contact (POCs) receiving one-on-one training; and
- Delivers and picks up UW containers at UWAAAs that are not located at an SAA.

#### **4.1.3 CENTRAL ACCUMULATION AREA OPERATORS**

The operator of the central accumulation area (CAA) (hereinafter referred to as the Hazardous Waste Center) supports the Hazardous Waste Program Manager and:

- Ensures accumulation of waste in the CAA is in accordance with 40 CFR 262.17;
- Provides waste containers and container labels;
- Obtains waste samples and waste analysis;
- Inspects the CAA as required by 40 CFR 262.17;
- Tracks all waste containers and waste disposition in EESOH-MIS;
- Tracks UW containers and waste disposition in EESOH-MIS for UW containers issued to SAAs only;
- Assists the Hazardous Waste Program Manager with data needs and data calls;
- Maintains an inventory of waste accumulated in the CAA;
- Delivers empty waste containers to organizations, and picks up waste containers from locations throughout JBER;

- Establishes and maintains waste profiles;
- Develops and submits waste turn-in documentation to ensure transportation of waste to permitted facilities, prior to exceeding the 90-day limit applicable to accumulation of waste in a CAA;
- Packages and labels waste for transportation in accordance with applicable federal regulations;
- Submits documentation to DLA-DS to ensure timely preparation of the biennial HW report;
- Inspects SAAs throughout JBER and communicates findings to the Hazardous Waste Program Manager;
- Provides advice to waste generators on JBER;
- Assists the Hazardous Waste Program Manager with exception reporting and required documentation, when applicable;
- Provides HW training, UW training, and non-creditable HW pharmaceutical training to military and civilian personnel on JBER in accordance with federal regulations.
- Maintains required documentation which may include, but is not limited to, waste analysis, waste profiles, inspection documentation, Uniform Hazardous Waste Manifests, non-hazardous waste manifests, UW shipment records, bills of lading, shipping documentation, waste exception reporting, training records, and appointments of Primary and Alternate Hazardous Waste Managers.

#### **4.1.4 COMMANDERS/LEADERS OF GENERATING ACTIVITIES**

Commanders/leaders of generating activities will:

- Appoint UECs per Air Force Instruction (AFI) 32-7001 Environmental Management;
- Ensure that a Primary and Alternate Hazardous Waste Manager is formally appointed as outlined within Appendix H – Appointment and Training of Primary and Alternate Hazardous Waste Managers. Allows facilities, shops, and equipment to be inspected for HW management regulatory compliance by installation fire, safety and health personnel, Hazardous Waste Program manager, and authorized inspectors;
- Submit a written request to the Hazardous Waste Program Manager to establish an initial SAA;
- Provide safe equipment and locations for SAAs and UWAAAs;
- Identify funding requirements for HW equipment and allocates funds based upon regulatory requirements; and
- Require the management of SAAs to comply with federal HW management regulations and with this environmental management plan; and
- Ensure all personnel (including contractors) under your command who handle HW or who supervise the handling of HW have received required training, as outlined in the Section 5.0 and Appendix H – Appointment and Training of Primary and Alternate Hazardous Waste Managers.

#### **4.1.5 UNIT ENVIRONMENTAL COORDINATORS**

In accordance with AFI 32-7001 and FRAGORD 629 to OPOD09-009, UECs shall maintain the following responsibilities:

- Serve as the Environmental Management System (EMS) conduit between the environmental function and their unit;
- Attend UEC training as provided by the installation within 90-days of appointment;
- Manage and monitor the EMS requirements for the unit. Provide any information required for installation environmental and sustainability performance measures;
- Meet with new personnel and review the environmental risks and impacts associated with their duties. Ensure new personnel receive EMS training;
- Monitor State 1 Management Internal Control Toolset (MICT) Self-Assessment Checklists (SACs) for all shops and ensure questions are answered accurately and up-to-date;
- Assist unit and environmental function with tracking and closing our environmental compliance findings, as required;
- Attend EMS Cross Functional Team (EMS-CFT) and other working groups, as requested; and
- Ensure smooth transition of UEC responsibilities and appointments by maintaining a continuity binder and notifying the appointing commander of required replacement.

Additionally, it is highly encouraged that UECs disseminate environmental outreach materials provided by 673 CES/CEIEC to their units.

#### **4.1.6 PRIMARY AND ALTERNATE HAZARDOUS WASTE MANAGERS**

Waste managers are responsible for supporting the obligation of their organization commander/leader to comply with this environmental management plan and all HW regulations. In addition to any specific compliance responsibilities that are specified throughout this environmental management plan, the Primary and Alternate Hazardous Waste Manager:

- Serves as the focal point for the organization's HW management activities;
- Serves as the focal point for the organization's UW management for UW managed at a SAAs;
- Coordinates with the Hazardous Waste Center and Hazardous Waste Program Manager to ensure that existing and new waste streams are properly determined to be either hazardous or non-hazardous at the point of generation of the waste;
- Must be familiar with this environmental management plan.
- Attends the JBER Hazardous Waste Manager Course training as required by Appendix H – Appointment and Training of Primary and Alternate Hazardous Waste Managers;
- Conducts routine inspections of each SAA and documents the inspection results utilizing the forms found within Appendix D – Inspections Forms. HW inspections must be

completed at least once every 7-calendar days and UW inspections must be completed at least once every 30-calendar days;

- Trains other organization personnel, as described in this environmental management plan;
- Maintains documentation of all inspections and trainings and provides documentation of inspections and trainings upon a request made by JBER Environmental Compliance staff or regulatory agency personnel;
- Affixes signs at all SAAs, as described within Appendix F – Satellite Accumulation Area Sign;
- Ensures that waste placed in containers only when waste is exactly as described on container labels,
- Remains aware that placement of waste not accurately described by container labels may be a violation of federal regulation;
- Ensures that waste generation, accumulation, pickup, and recordkeeping all comply with applicable policies, regulations, laws, and this environmental management plan,
- Coordinate with the Hazardous Waste Program Manager, Fire Prevention, Bioenvironmental Engineering, and applicable Safety office during the placement (or relocation) of a SAA,
- Notifies the Hazardous Waste Program Manager of all changes in activities including, but not limited to, the location of a new SAA, relocation of an existing SAA, any change in chemicals used in an existing waste generation process, generation of a new waste stream, and any change in waste managers,
- Ensures the organization commander/leader is aware of a change that will require appointment of a replacement Primary or Alternate Hazardous Waste Manager in accordance with Appendix H – Appointment and Training of Primary and Alternate Hazardous Waste Managers.
- Corrects deficiencies to ensure compliance with HW regulations and this environmental management plan,
- Provides completed and signed waste container certification forms and user knowledge statements as required by this environmental management plan; and
- Contacts the Hazardous Waste Center or the Hazardous Waste Program Manager when he/she has a question about waste management or desires compliance assistance.

#### **4.1.7 FACILITY MANAGERS**

Facility managers are responsible for supporting the obligation of their organization commander/leader to comply with all UW regulations as well as this environmental management plan. In addition to any specific compliance responsibilities that are specified throughout this environmental management plan, a Facility Manager:

- Serves as the focal point for the organization’s UW management activities only if the UW is not being managed at an SAA;
- Coordinates with the Universal Waste Program Manager to establish a new UWAAs;

- Coordinates with the Universal Waste Program Manager for UW container delivery and/or pick-up;
- Must be familiar with this environmental management plan;
- Inspects each UWAA and entire facility for mismanaged UW at least once a month, document inspections, and correct deficiencies immediately;
- Reports mismanaged UW to the Universal Waste Program Manager;
- Ensures facility tenants are aware of proper UW management as described in this environmental management plan;
- Affixes signs at all UWAAAs, as described within Appendix I – Universal Waste Accumulation Management Sign;
- Ensures that UW is placed in containers only when the UW is exactly as described on container labels; and
- Remains aware that placement of UW not accurately described by container labels may be a violation of federal regulation.

## **5 TRAINING**

### **5.1**

Hazardous waste training is required by law. All training requirements and sources are provided in the Environmental Training Matrix on eDASH. Specific local training procedures are provided in section 5.5.

### **5.2**

Hazardous waste training is provided only by qualified authorized personnel. Training records are maintained IAW Recordkeeping and Reporting section of this plan.

### **5.3**

Hazardous waste program managers and alternates appointed in writing by the installation Commander to sign manifests, require specific training to include HW Management Compliance Training and Department of Transportation training to sign HW manifests. Installation HW Program Managers should complete the following in-residence courses (or equivalent): Air Force Institute of Technology (AFIT) 521, Hazardous Waste Management; and DLA - DCPSO00510, Transportation of Hazardous Material/Hazardous Waste (Interservice Environmental Education Review Board [ISEERB] approved). After initial course completion, refresher training is required annually for RCRA, and every 3-years for the DoT course. See training matrix for more information.

### **5.4**

Function-Specific Training (Local In-House/On-Line Training Sources): (Group A) Organizational (non-central) Hazardous Waste Storage Area Managers, Satellite Accumulation Area (Initial Accumulation Point) Managers, and their immediate supervisor; and (Group B) all shop personnel, and their immediate supervisors, who generate HW.

### **5.5 JBER-SPECIFIC TRAINING REQUIREMENTS FOR MILITARY, CIVILIAN, AND CONTRACTOR PERSONNEL**

All military and civilian personnel whose work involves hazardous or other regulated wastes, and their immediate supervisor, must successfully complete training appropriate to their job duties; see Figure 1: Training Matrix for Key Personnel. Any individual who has not yet received HW training shall not perform any duties related to HW unless doing so under the direct supervision of a trained individual. All training records will be maintained in accordance with the Recordkeeping and Reporting section of this environmental management plan.

All contractor personnel whose work involves hazardous or other regulated wastes, and their immediate supervisor, must successfully complete training appropriate to their job duties. Any individual who has not yet received HW training shall not perform any duties related to HW unless doing so under the direct supervision of a trained individual. The prime contractor is responsible for ensuring all contract personnel are trained in accordance with federal Hazardous Waste Regulations (40 CFR § 262.17(a)(7) and 40 CFR § 273.36) and Hazardous Material Regulations (49 CFR § 172.704), if applicable. All training records will be maintained in accordance with the Recordkeeping and Reporting section of this environmental management plan.

Figure 1: Training Matrix for Key Personnel

Type of Training	Key Personnel									Training Frequency	Available Course(s)	Regulatory Citation(s)
	HW Program Manager	UW Program Manager	Personnel Authorized to Sign Uniform Hazardous Waste Manifests	CAA Personnel	Primary and Alternate HW Managers	Pharmacy Personnel with HW Duties	All Other Personnel with HW Duties	Facility Managers	Non-Delegated UW Point-of-Contact			
RCRA HW	✓	✓	✓	✓						Annual	McCoy RCRA 5-Day Seminar McCoy RCRA 2-Day Seminar Air Force RCRA Annual Refresher / HW Accumulation Seminar (WESS 010)	40 CFR § 262.17(a)(7)
DoT HM Employee	✓		✓	✓						Every 3 years	Transportation of HM/HW for DoD (DCPSO00R510)	49 CFR § 172.704 Defense Transportation Regulation (DTR) 4500.9-R, Part II, Chapter 204
OSHA HAZWOPER	✓			✓						Annual	40-Hour HAZWOPER Course (Initial) 8-Hour HAZWOPER (Refresher)	29 CFR § 1910.120
Air Force-Specific	✓									One-Time	HW Management (WENV 521)	AFMAN 32-7002, Chapter 5, Section 6.1.5
Site-Specific	✓	✓	✓	✓	✓		*			Annual	JBER HW Manager Course	40 CFR § 262.17(a)(7)
RCRA Non-Creditable HW Pharmaceuticals	✓		✓	✓	Only if working at a pharmacy		*			Annual	JBER HW Manager Course	40 CFR § 266.502(b)
RCRA UW Only								✓		Annual	Facility Manager Training	40 CFR § 273.36
									✓	Annual	Training provided and documented by UW Program Manager	
On-the-Job							*	*		Annual	Training provided and documented by a Primary / Alternate HW Manager	40 CFR § 266.502(b)
												40 CFR § 262.17(a)(7)

NOTES: ✓ = Required Training / \* = Required Training (select one only).

### **5.5.1 TIMEFRAMES FOR COMPLETING INITIAL TRAINING**

Timeframes for completion of initial training will vary based upon the type of training required. These timeframes are outlined below.

RCRA Hazardous Waste Training: If required, training must be completed within six months of the employee's date of employment or assignment to work involving Hazardous or other regulated waste. – 40 CFR § 262.17(a)(7).

RCRA Non-Creditable Hazardous Waste Pharmaceuticals Training: If required, training must be completed prior to performing any duties related to non-creditable HW pharmaceuticals – 40 CFR § 266.502(b).

RCRA Universal Waste Training: If required, training must be completed prior to performing any duties related to UW – 40 CFR § 279.36.

DoT Hazardous Material Training: If required, training must be completed within 90-calendar days of the employee's date of employment or change in job function – 49 CFR § 172.704.

JBER Hazardous Waste Manager Course: If required, training must be completed within 60-calendar days of appointment.

### **5.5.2 JBER-SPECIFIC TRAINING OPPORTUNITIES**

In order to be compliant with federal regulations, JBER has several training opportunities that are conducted locally and offered throughout the year. These training opportunities include: JBER Hazardous Waste Manager Course; Non-Creditable Hazardous Waste Pharmaceutical Training; Universal Waste Training; Facility Manager Training; Universal Waste Training; and On-the-Job Training. Additional information regarding each of these unique training opportunities is included below.

#### **5.5.2.1 JBER HAZARDOUS WASTE MANAGER COURSE**

The JBER Hazardous Waste Manager Course is for all military and civilian personnel who generate HW, HW pharmaceuticals, UW, or other regulated waste. This course was developed to meet the requirements outlined within 40 CFR § 262.17(a)(7), 40 CFR § 273.36, and 40 CFR § 266.502(b) and covers: roles and responsibilities; training requirements; recordkeeping requirements; waste identification and containerization; container marking and labeling; container management; satellite accumulation area requirements; waste minimization; and spill response and reporting requirements. While Primary and Alternate Hazardous Waste Managers are required to attend this course in-person, several other key personnel may receive this training while on-the-job from a Primary or Alternate Hazardous Waste Manager. A JBER Hazardous Waste Manager Course certificate is provided upon successful completion of the course. See Appendix R – JBER Hazardous Waste Manager Course for additional information regarding this training opportunity.

### **5.5.2.2 NON-CREDITABLE HAZARDOUS WASTE PHARMACEUTICAL TRAINING**

Non-creditable HW pharmaceutical training is an annual requirement for all military and civilian personnel who generate non-creditable HW pharmaceuticals. These personnel must be thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies as outlined within 40 CFR § 266.502(b). Several key personnel to include, but not limited to, Pharmacy Personnel with HW Duties receive non-creditable HW pharmaceutical training when they attend the JBER Hazardous Waste Manager Course or through on-the-job training that is provided by the Primary or Alternate Hazardous Waste Manager.

### **5.5.2.3 UNIVERSAL WASTE TRAINING**

UW training is an annual requirement for all military and civilian personnel who handle UW. These personnel must be familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies in accordance with 40 CFR § 273.36. While most key personnel receive UW training while attending the JBER Hazardous Waste Manager Course, Facility Managers and non-delegated UW POCs are not required to complete this course. The UW training that both Facility Managers and non-delegated UW POCs receive was developed to meet the requirements outlined within 40 CFR § 273.36 and covers: roles and responsibilities; waste identification and containerization; container marking and labeling; container management; UWAA requirements; and spill response and reporting requirements. Both Facility Managers and non-delegated UW POCs receive UW training handouts designed to re-emphasize the training received.

#### ***5.5.2.3.1 FACILITY MANAGERS***

Facility Managers receive initial UW training while attending the Facility Manager Training and is documented by way of a Facility Manager Training certificate. Subsequent on-the-job UW training is received upon issuance of a UW container with the training being documented using Appendix P – Acknowledgement of Understanding.

#### ***5.5.2.3.2 NON-DELEGATED UNIVERSAL WASTE POINTS-OF-CONTACT***

Non-delegated UW POCs receive on-the-job UW training upon issuance of a UW container with the training being documented using Appendix P – Acknowledgement of Understanding.

### **5.5.2.4 ON-THE-JOB TRAINING**

As an alternative to completing the JBER Hazardous Waste Manager Course, military and civilian personnel may complete on-the-job training when assigned duties that are related to HW and/or non-creditable HW pharmaceuticals. This training is provided by the Primary or Alternate HW Manager and must be documented in accordance with Air Force, Army, or agency policy.

## 6 RECORDKEEPING AND REPORTING

### *RECORDKEEPING*

The installation complies with the following U.S. Federal HW recordkeeping requirements as applicable based on generator status. NOTE: Retention time is defined by regulation as onsite and readily accessible for inspections and/or reference; after retention, the record(s) follow applicable Air Force Records Management rules.

Table 6-1: Summary of HW Recordkeeping Requirements

Record*	Citation*	Retention Time**	Citation
HW determination documentation	40 CFR § 262.11(f)	3 years from the date that the waste was last sent to a TSDF.	40 CFR § 262.11(f)
HW Biennial/Annual Report	40 CFR § 262.41	3 years from the due date of the report.	40 CFR § 262.40(b)
HW manifest (electronic or paper)	40 CFR § 262.20	3 years from the day the waste was accepted by the initial transporter.	40 CFR § 262.40(e)
Small Qty HWAS inspection logs	40 CFR § 262.14(b)(2)(iv)	Although records are not formally required, the best management practice is to record and retain for 3 years to demonstrate compliance.	N/A
Large Qty HWAS inspection logs	40 CFR § 262.17(a)(1)(v) 40 CFR § 264.15(d) 40 CFR § 265.15(d)	For interim and permitted operations, 3 years from the date the inspection was conducted. For all other LQGs, the best management practice is to retain for 3 years to demonstrate compliance.	40 CFR § 265.14(d) 40 CFR § 265.15(d)
Preparedness and prevention	40 CFR § 262.16(b)(8)(iv)(B)	The federal regulations do not offer a minimum retention time, but the best management practice is to retain	N/A

arrangements with local authorities		the pan while active and for 3 years thereafter to demonstrate compliance.	
Consolidation of HW received from very small quantity generators.	40 CFR § 262.17(f)	3 years from the date the HW was received from the very small quantity generator.	40 CFR § 262.17(f)
Exception Reports	40 CFR § 262.42	3 years from the due date of the report.	40 CFR § 262.40(b)
Land restricted waste determination	40 CFR § 268.7(a)(1)	3 years from the date the determination was required to be conducted. If not required, 3 years from the date the waste was last sent to a TSDF.	40 CFR § 268.7(a)(8)
Land restricted notice and certification	40 CFR § 268.7(a)(2)	3 years from the date the waste was last sent to a TSDF.	40 CFR § 268.7(a)(8)
Notification of intent to export waste	40 CFR § 262.83(b)	3 years from the date the HW was accepted by the initial transporter.	40 CFR § 262.83(i)(1)(iii)
Waste export confirmation of receipt and exception reports	40 CFR § 262.83(h)	3 years from the date the HW was accepted by the initial transporter.	40 CFR § 262.83(i)(1)(iii)
Annual report (required of primary exporters of HW)	40 CFR § 262.83(g)	3 years from the date the HW was accepted by the initial transporter.	40 CFR 262.83(i)(1)(iii)
Employee training records (including	40 CFR § 262.16(b)(9)(iii) 40 CFR § 262.17(a)(7)(iv)	For interim and permitted operations – current personnel: until closure of the site. For interim and permitted operations – former personnel: 3 years from date the	40 CFR § 262.17(a)(7)(iv) 40 CFR § 264.16(e)

appointment letters for key personnel)	40 CFR § 264.16(d) 40 CFR § 265.16(d)	individual last worked there.  For all other LQGs and SQGs, the best management practice is to retain for 3 years to demonstrate compliance.	40 CFR § 265.16(e)
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\*Permitted Treatment, Storage, and Disposal Facilities (TSDF) comply with recordkeeping requirements established in their HW permit.

\*\*Retention Time may be extended during the course of any unresolved enforcement action or as requested by the EPA. The AF, through the Air Force Records Information Management System (AFRIMS), requires that HW-related reports, documents, studies, HW manifests, and disposal records (including contracts) are destroyed 50 years from the date of the record. Note that the records required by law or external regulation, should be readily available on-site. Records required by AF Record Retention requirements can be archived.

***Reporting***

The HW Program Manager, and other designated personnel, generate needed reports from the Enterprise Environmental, Safety, and Occupational Health - Management Information System (EESOH-MIS).

Enforcement actions, spills, and inspections are reported via the Enforcement Actions, Spills, and Inspections Environmental Reporting (EASIER) database.

See Sections 11.2 through 11.5 for JBER-specific recordkeeping and reporting requirements.

## **7 PROCEDURES**

This section contains procedures for managing HW from identification, accumulation, offsite transportation, and disposal. The HW Program Manager ensures that appropriate procedures are properly communicated and followed by all necessary personnel.

### **7.1 WASTE INVENTORY**

A current waste inventory can be generated within EESOH-MIS using the Ad-Hoc Reporting Tool or by completing the following steps:

- Log into EESOH-MIS, select the “Reporting” option, and select “Hazardous Waste” to generate the Waste Site Waste Stream Summary Report.

The resulting waste inventory report can be placed into Appendix B, Hazardous Waste Streams/Profiles.

See Section 11.6 for JBER-specific information about validation of waste stream inventories and Appendix B – Hazardous Waste Streams/Profiles for an example of the type of information stored in EESOH-MIS. Contact the CAA or HW Program Manager for instructions about how to manage a new waste site or waste stream. See the instructions above for how to obtain a copy of the Waste Site Waste Stream Summary Report.

### **7.2 WASTE IDENTIFICATION**

The HW Program Manager determines the nature of waste based on a detailed qualitative analysis of the regulated waste generating process, associated Safety Data Sheet (SDS) information, and coordination with generating activity personnel involved in the use of hazardous materials. If uncertainties about a waste stream exist, the HW Program Manager pursues waste stream sampling and analysis IAW the Waste Analysis Plan (WAP) found in Appendix A.

The WAP details the wastes that have been evaluated and analyzed, a description of the testing and analytical methods used, the HW sampling methods used, the location of samples taken for analysis and frequency, sample documentation, sample quality assurance and quality control procedures, and sample request procedures.

Generator knowledge and the results of the WAP are used to minimize waste re-characterizations to those instances where a process change has occurred, or the waste stream is highly variable.

See Section 11.7 for JBER-specific waste identification information.

### **7.3 CONTAINER MANAGEMENT**

Container management procedures are as follows:

- Containers storing HW must be in good condition and meet transportation and other applicable requirements. “Good condition” means there should be no severe rusting, no sharp-edged creases or dents, no bulging heads, and no severe structural defects
- Ensure that the waste material will not react with the container itself.
- Use plastic or plastic-lined steel drums to safely store corrosive wastes.
- Immediately transfer the contents of a leaking container to another container or over pack into a salvage drum.
- Containers with free liquid or drum contents on top must be cleaned or over packed in the case of a leak.
- Containers must remain closed at all times except when adding or removing waste.
- Adequate headspace must be maintained at all times when filling a container to account for content expansion. The required headspace is unique to each waste stream and expected storage conditions. For liquids and volatile chemicals, a general rule is to not fill to more than 85% of container capacity to allow for temperature changes, and this equates to approximately four inches of headspace in a typical 55-gallon drum. The ultimate requirement is performance based, such that drums do not bulge or leak. A good inspection process will enable any recommendations for specific waste streams as appropriate.
- Containers holding HW must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.
- Containers of flammable liquids must be grounded when transferring flammable liquids from one container to the other.

See Sections 11.8 through 11.16 for JBER-specific container management information.

## **7.4 LABELING AND MARKING**

Containers used for the accumulation and transportation of HW are properly labeled IAW applicable laws and regulations.

Each container is properly marked and labeled from an IAP to disposal/turn-in. The waste-generating activity ensures that the label on each waste container is clearly visible for inspection. During accumulation at an IAP, HW containers are marked with the following:

- The words “Hazardous Waste”;
- A description of the contents of the container; and
- The hazards associated with the waste.

Once an IAP accumulates more than 55-gallons of HW (or 1 quart of acute HW), the IAP site manager marks the container with the date on which 55-gallons (or 1 quart of acute HW) is exceeded and removes the excess of 55-gallons (or 1 quart of acute HW) within 3-days.

HW containers 110-gallons or less that are shipped offsite are marked with the following:

- “Hazardous Waste – Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency”;
- Generator’s name and address;
- Generator’s EPA ID Number; and
- Manifest tracking.

These markings are:

- Durable;
- In English;
- Printed on or affixed to the surface of a package or on a label, tag, or sign displayed on a background of sharply contrasting color;
- Unobscured by labels or other attachments; and
- Located away from any other markings that might substantially reduce visibility or effectiveness.

Universal waste (UW), or a container in which a UW is contained, is labeled and marked clearly with the date the material became a waste and the name of the waste, as described below:

- UW batteries must be labeled with any one of the following phrases: “Universal Waste – Battery(ies),” “Waste Battery(ies),” or “Used Battery(ies)”;
- UW thermostats must be labeled with any of the following phrases: “Universal Waste – Mercury Thermostat(s),” “Waste Mercury Thermostat(s),” or “Used Mercury Thermostat(s)”;
- UW pesticides must be labeled with one of the following phrases: “Universal Waste – Pesticide(s)” or “Waste – Pesticide(s)”;
- UW lamps must be labeled with one of the following phrases: “Universal Waste – Lamp(s),” “Waste Lamp(s),” or “Used Lamp(s).”

See sections 11.8 through 11.11 for JBER-specific labeling and marking information.

## **7.5 ACCUMULATION AREA MANAGEMENT**

Accumulation area management procedures are as follows:

- IAPs are used to accumulate up to 55-gallons of HW or 1-quart of acute HW;
- If HW or acute HW are accumulated in excess of these amounts, the generator marks the container with the date the amount was exceeded and transfers the container to a HWAS or TSDF with 3-days;
- HW is accumulated in a HWAS for up to 90-days for a large quantity generator (LQG), or 180-days (270-days if waste has to be shipped over 200-miles) for a small quantity generator (SQG); and
- HWASs comply with all applicable federal, state, and local accumulation requirements, including proper waste segregation.

Once a SAA accumulates more than 55-gallons of HW (or more than 1-quart of liquid acute HW, or more than 1-kilogram of solid acute HW), the Primary or Alternate Hazardous Waste Manager marks the container with the date on which 55-gallons (or 1-quart of liquid acute HW, or 1-kilogram of solid acute HW) is exceeded. The amount of HW that exceeds 55-gallons (or 1-quart of liquid acute HW, or 1-kilogram of solid acute HW) must be transported from the SAA to the Hazardous Waste Center or a TSDF within three consecutive calendar days. Refer to Section 11.8.2 “What must a Primary or Alternate Hazardous Waste Manager do when accumulating hazardous waste in a satellite accumulation area?” See Sections 11.8 through 11.13 for JBER-specific accumulation area management information.

## **7.6 TRANSPORTATION**

The HW Program Manager has overall responsibility for the transportation of HW from an IAP to an HWAS, and from and HWAS to the disposal facility. The HW Program Manager ensures:

- All transportation over public highways is conducted IAW applicable Department of Transportation (DoT) requirements;
- Containers are DoT approved;
- Transporters have the appropriate training;
- Uniform Hazardous Waste Manifests are prepared for offsite transportation (electronically or paper); and
- All necessary documentation has been completed and records are maintained IAW all applicable federal, state, and local requirements and the AF Records Disposition Schedule.

See Sections 11.13 through 11.15 for JBER-specific transportation information.

## **7.7 TURN IN/DISPOSAL**

The turn in procedures contained in DoD 4160.12-M DLA Disposition Services are followed. In the event an alternate route for disposal is needed, a waiver will be obtained with proper justification and approval.

Containers are inspected prior to turn-in to ensure that container management procedures have been followed and that containers are properly labeled and in good condition. If the container is not in good condition, contents are transferred to a container that is in good condition.

See Sections 11.13 through 11.16 for JBER-specific turn-in/disposal information.

## **7.8 INSPECTION**

Inspection processes fulfill the “Check” function of the EMS “Plan, Do, Check, Act” cycle. HWASs are inspected at least weekly to ensure proper accumulation and container management. Resource Conservation and Recovery Act Part B permitted storage facilities are inspected according to the inspection schedule established in the permit. All other inspections occur IAW

AFI 90-201, *The Air Force Inspection System*, and the Commander's Self Inspection Program. Inspection records are maintained IAW the Recordkeeping and Reporting section of this plan.

### **7.8.1 INSPECTION**

See Section 11.167 for JBER-specific inspection information.

## **7.9 WASTE MINIMIZATION/HW RECYCLING**

HW manifests include certification that a waste minimization program is in place. Below are key activities and processes that are performed as part of waste minimization and pollution prevention efforts.

- Hazardous material process authorization and hazardous materials management processes – Each process involving use of hazardous materials and generation of waste streams is evaluated and authorized. Process authorization is performed through EESOH-MIS. The HW Program Manager, Hazardous Materials Management Program (HMMP) Team, and the generating activity make a final determination whether or not the results of the process authorization effort are sufficient to reduce waste toxicity and volume.
- Procurement and use of minimal quantities – When a material with environmental risk must be used, minimal quantities are procured to minimize surplus quantities and shelf life exceedances.
- Recycling – When the use of hazardous materials is unavoidable, excess or waste material is evaluated for reuse or recycling.
- Environmental action planning – Environmental Action Plans (EAPs) are developed and maintained as part of the overall EMS. EAPs are management plans that translate environmental objectives and targets into actional plans. Waste minimization efforts are considered during development of EAPs.
- Recycle or reclaim RCRA Subtitle C HW as appropriate, maximize RCRA authorized exclusions, variances, or exemptions to reduce the amount of HW and other regulated waste generated, avoid disposal costs, and improve solid waste diversion rates.
- Specific installation procedures are outlined below.

To meet the regulatory requirement to have a waste minimization program, JBER implements a Hazardous Materials Management Process (HMMP). All organizations are required to obtain approval through the HMMP to possess and use hazardous materials (HM) on JBER. For additional information, contact the Hazardous Materials Program Manager in 673 CES/CEIEC. See contact information located within Appendix M – Points of Contact.

## **7.10 PREPAREDNESS AND PREVENTION**

Preparedness and prevention practices are described in emergency prevention and response plans available through the references section of this plan and are maintained IAW the EMS on eDASH: Emergency Preparedness and Response, and shall include as warranted the Installation

Spill Prevention, Control, and Countermeasures (SPCC) Plan (or equivalent) or a specific HW Contingency Plan.

Each organization is required to provide spill response equipment as appropriate to respond to a spill of the type of waste generated, accumulated, or handled by the organization. Funding for the purchase of spill response supplies and equipment is the responsibility of each applicable organization. Many organizations may be able to purchase spill response supplies and equipment at the U.S. General Services Administration (GSA) ServMart on JBER. Contact information is located within Appendix M – Points of Contact. In addition, numerous industry vendors sell spill response supplies and equipment.

To meet preparedness, prevention, and emergency procedures, JBER implements an Installation Emergency Management Plan/Continuity of Operations Plan (IEMP/COOP) 10-2, a Base Civil Engineer Contingency Response Plan/Continuity of Operations Plan (BCE CRP/COOP), and a Spill Prevention, Control, and Countermeasures Plan/Oil Discharge Prevention and Contingency Plan. These three plans are available through the JBER Plans and Programs SharePoint site at: <https://usaf.dps.mil/sites/jber/673ABW/XP/Current%20673%20ABW%20Plans/Forms/Default.aspx>. In the event of a HW spill (regardless of size), a person discovering a spill will immediately notify JBER Fire and Emergency Services by dialing 911 and indicating the spill is on JBER in accordance with Appendix S – JBER Spill Reporting Poster. This will ensure appropriate cleanup and notification measures. The first person observing a spill should report information and take action as shown in the checklist in Appendix O – Checklist for the First Person Observing a Spill.

Organizations and/or Squadron Commanders/Directors/Leaders will reimburse 673 CES/CEIEC for the initial and intermediate clean-up response as well as waste container and disposal expenses if environmental quality funds are used.

## **7.11 WASTE SPECIFIC PROCEDURES**

Waste-specific procedures are included in the installation supplement below or maintained as separate operational controls outside of this plan. As applicable, this may include unique processes or procedures to deal with a specific waste not already addressed elsewhere in the HWMP, such as acutely hazardous wastes, pharmaceutical hazardous waste, used oil, etc...

See Sections 11.17 through 11.18 for JBER-specific waste procedures.

## 8 REFERENCES

### *Standard References (Applicable to all AF Installations)*

- [AFI 32-7001, Environmental Management](#)
- [AFM 32-7002, Environmental Compliance and Pollution Prevention](#)
- [AFI 90-201, The Air Force Inspection System](#)
- [AFLOA HW Legal and Other Requirements](#) – The Air Force Legal Operations Agency (AFLOA) legal registry lists and provides access to federal (e.g., CFR, U.S. Code), DoD, AF, and other legal requirements
- [ARCNet](#) – Training resource for Air Force Reserve Command
- [DoD 4160.21 \(all volumes\), Defense Materiel Disposition](#)
- [EASIER Database](#)
- [eDASH HW Environmental Action Plans \(EAPs\)](#)
- [eDASH HW Home Page](#)
- [eDASH HW Training Matrix](#)
- [EESOH-MIS Application Login](#)
- [EESOH-MIS Support Portal](#)
- [The Environmental Awareness Course Hub \(TEACH\)](#)
- [HW Playbook](#)
- AF Form 55 – Environmental Health and Safety Record
- DD Form 1348-1a – Issue Release/Receipt Document
- DLA Form 2511 – Hazardous Waste Profile Sheet
- EPA Form 8200-22 – Uniform Hazardous Waste Manifest
- EPA Form 8700-13 A/B – Hazardous Waste Report Form
- JBER Installation Emergency Management Plan/Continuity of Operations Plan
- 673 CEG Base Civil Engineer Contingency Response Plan/Continuity of Operations Plan (BCE CRP/COOP)
- JBER Spill Prevention, Control, and Countermeasures Plan/Oil Discharge Prevention and Contingency Plan
- RCRA HW Permit
- Enterprise, Environmental, Safety, and Occupational Health Management Information System (EESOH-MIS)

## 9 ACRONYMS

### *Standard Acronyms (Applicable to all AF Installations)*

- [eDASH Acronym Library](#)
- [HW Playbook – Acronym Section](#)
- [U.S. EPA Terms & Acronyms](#)
- ABW – Air Base Wing
- CAA – Central accumulation area

- CEIEC – Environmental Compliance Section
- CEG – Civil Engineer Group
- CES – Civil Engineer Squadron
- CFR – Code of Federal Regulations
- DLA-DS – Defense Logistics Agency - Disposition Services
- DOT – Department of Transportation
- EESOH-MIS – Enterprise Environmental, Safety, and Occupational Health, Management Information System
- EPA – Environmental Protection Agency
- FM – Facility Manager
- HAZMART – Hazardous Materials Pharmacy
- HM – Hazardous Material
- HW – Hazardous Waste
- HWMP – Hazardous Waste Management Plan
- HWPS – Hazardous Waste Profile Sheet
- HMMP – Hazardous Materials Management Process
- JBER – Joint Base Elmendorf-Richardson
- LDR – Land disposal restriction
- LQG – Large quantity generator
- NHWAA – Non-Hazardous Waste Accumulation Area
- OWS – Oil water separator
- PCB – Polychlorinated biphenyl
- POC – Point of Contact
- POL – Petroleum, oil, and lubricant
- RCRA – Resource Conservation and Recovery Act
- SAA – Satellite Accumulation Area
- SDS – Safety Data Sheet
- UW – Universal waste
- UWAA – Universal Waste Accumulation Area

## **10 DEFINITIONS**

Standard Definitions (Applicable to all AF Installations)

- [HW Playbook – Definitions Section](#)

None applicable.

# **11 INSTALLATION-SPECIFIC CONTENT**

## **11.1 UNIVERSAL WASTE TYPES**

Federal regulations identify five types of materials that may be managed as a UW. These five materials are: batteries; pesticides; mercury-containing equipment; lamps; and aerosol cans.

A battery is, "...a device consisting of one or more electrically connected electrochemical cells which is designed to receive, store, and delivery electric energy" (EPA, 2023). UW batteries may include, but are not limited to:

- lithium batteries;
- nickel-metal hydride batteries;
- nickel-cadmium batteries; and
- all rechargeable batteries.

On JBER, UW batteries are very common. Important to note, alkaline batteries are not UW. See Section 11.17.9 – Batteries for additional information.

A pesticide is, "any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest, or intended for use as a plant regulator, defoliant, or desiccant..." (EPA, 2023). UW pesticides includes both unused and recalled pesticides. On JBER, UW pesticides are not common.

Mercury-containing equipment is, "...a device or part of a device (including thermostats, but excluding batteries and lamps) that contains elemental mercury integral to its function" (EPA, 2023). UW mercury-containing equipment may include, but is not limited to thermostats and thermometers. On JBER, mercury-containing equipment is not common.

A lamp is, "...the bulb or tube portion of an electric lighting device" (EPA, 2023). UW lamps may include, but are not limited to:

- Fluorescent light tubes;
- Compact fluorescent lights (CFLs);
- High intensity discharge (HID);
- Neon;
- Mercury vapor;
- High pressure sodium; and
- Metal halide lamps.

On JBER, UW lamps are very common. See Section 11.17.7 – Fluorescent Lamps for additional information.

An aerosol can is, "...a non-refillable receptacle containing gas compressed, liquified, or dissolved under pressure, the sole purpose of which is to expel a liquid, paste, or powder and

fitted with a self-closing release device allowing the contents to be ejected by the gas” (EPA, 2023). UW aerosol cans may include, but are not limited to:

- Paint;
- Adhesives;
- Lubricants;
- Air fresheners;
- Grease;
- Canned air;
- Cleaners; and
- Polishers.

On JBER, UW aerosol cans are very common. See Section 11.17.6 – Aerosol Cans for additional information.

## **11.2 RECORDKEEPING AND REPORTING**

All records will be maintained in accordance with applicable federal regulations and Air Force records disposition requirements.

## **11.3 HAZARDOUS WASTE RECORDS**

The Hazardous Waste Program Manager is responsible for maintaining the following HW records:

- Waste profile sheets;
- Non-hazardous waste manifests;
- Uniform Hazardous Waste Manifests;
- Land disposal restriction (LDR) notifications;
- Exception reports;
- UW shipment records;
- Annual recertifications of waste profile sheets;
- Biennial reports; and
- Training records.

The Hazardous Waste Center is responsible for maintaining the following HW records:

- Waste profile sheets;
- DD Form 1348-1a documents;
- DD Form 1155 documents;
- Non-hazardous waste manifests;
- Uniform Hazardous Waste Manifests;
- LDR notifications;
- Exception reports;
- Quarterly Hazardous Waste Compliance Assessment records;

- CAA inspections records;
- Primary and Alternate Hazardous Waste Manager appointments; and
- Training records.

Hardcopy records pertaining to the TSDF legacy operations are maintained at 11375 Vandenburg Avenue.

## **11.4 HAZARDOUS WASTE NOTEBOOKS**

All military organizations, civilian organizations, tenants, and contractors, are required to create and maintain, at each SAA, a HW Notebook containing the following information applicable to the specific SAA:

- The most recent form, and all forms/letters for the previous 3 years, appointing Primary and Alternate Hazardous Waste Managers;
- Training records for all Primary and Alternate Hazardous Waste Managers as well as organization personnel trained during the current and previous 3 years;
- Completed inspection checklists for the current and previous 3 years;
- Summary Sheet of Waste Streams and Profile Numbers and waste stream validations; and
- Certified waste stream descriptions.

Important to note, electronic copies of documentation are acceptable only if the organization keeps the storage media in the HW notebook and ensures a working computer is available to view the documentation upon a request of the Hazardous Waste Program Manager or regulatory agency personnel.

## **11.5 UNIVERSAL WASTE ACCUMULATION AREA NOTEBOOKS**

All military organizations, civilian organizations, tenants, and contractors, are required to create and maintain, at each UWAA, a UW Notebook containing the following information applicable to the specific accumulation area:

- The most recent Facility Manager appointment letter, and all forms/letters for the previous 3 years, appointing Facility Managers;
- Training records for Facility Managers trained during the current and previous 3 years; and
- Completed UWAA inspection checklists for the current and previous 3 years;

Important to note, electronic copies of documentation are acceptable only if the organization keeps the storage media in the UW notebook and ensures a working computer is available to view the documentation upon a request of the Universal Waste Program Manager, Hazardous Waste Program Manager, or regulatory agency personnel.

## **11.6 WASTE STREAM INVENTORY**

The current and complete waste stream inventory is stored in EESOH-MIS and is not a part of this environmental management plan because it changes frequently. See Appendix B – Hazardous Waste Streams/Profiles for an example of some of the waste stream inventory information stored in EESOH-MIS. The Hazardous Waste Program Manager may ask waste managers to validate the waste stream inventories, to determine if the organization is generating the waste streams shown as active in EESOH-MIS. If asked by the Hazardous Waste Program Manager, Primary and Alternate Hazardous Waste Managers are required to cooperate and validate the waste stream inventory. Primary and Alternate Hazardous Waste Managers will indicate whether the organization is generating each waste stream. The Hazardous Waste Program Manager will document the waste stream validation and provide a copy of the documentation to the waste managers. Primary and Alternate Hazardous Waste Managers will keep a copy of the waste stream validation in the appropriate HW notebook. The purpose of the validation is to ensure JBER maintains current information about waste streams.

## **11.7 WASTE IDENTIFICATION AND WASTE ANALYSIS PLAN**

If a RCRA HW permit is in effect, the waste analysis plan (WAP) in the permit takes precedence and is incorporated by reference. In the absence of a WAP prescribed in a RCRA HW permit, the activities described below will serve as the WAP for JBER.

All waste determinations will be made at the point of generation of waste, prior to any mixing, dilution, or alteration of the waste, and at any time that waste properties have changed, or may have changed, such that the RCRA classification may change. Waste determinations will be made in accordance with 40 CFR § 262.11. If laboratory analysis of a representative sample of waste will be used to determine if waste exhibits hazardous characteristics, analysis will be by the methods required by 40 CFR §§ 262.21 – 262.24.

Waste is HW if it meets any of the listing descriptions under Subpart D of 40 CFR Part 261. Waste is HW if it exhibits one or more of the hazardous characteristics as identified in Subpart C of 40 CFR Part 261.

JBER will evaluate non-hazardous waste profiles every four years, to determine if the wastes streams will be managed as hazardous or non-hazardous waste. If a waste determination uses laboratory analysis, of a representative sample of a waste stream, to establish that a waste may be managed as non-hazardous, JBER will document the waste determination and profile, and may manage the waste stream as non-hazardous for four years, as long as nothing changes. The JBER Hazardous Waste Program Manager may choose to manage non-hazardous waste as HW if it will be cost-effective, or if laboratory analysis detects a contaminant close to the regulatory level. JBER will analyze a representative sample of non-hazardous waste streams and establish another waste determination/profile no later than 4 years (1,460 days) from the date of the last waste determination.

JBER will evaluate HW profiles every five years. If a waste determination uses laboratory analysis, of a representative sample of a waste stream, to establish that a waste stream must be managed as hazardous, JBER will document the waste determination and profile, and will manage the waste stream as hazardous for 5 years, as long as nothing changes. JBER will analyze a representative sample of HW streams and establish another waste determination/profile no later than 5 years (1,825 days) from the date of the last waste determination. JBER will never manage HW as non-hazardous waste.

If there are any changes in a waste generation process, the characteristics of the waste may change. After a change in a waste generation process, and prior to a new waste determination, it may be inappropriate to assume the waste can be managed as it had been managed prior to a change. If anything changes in the waste generation process, a waste manager with the organization generating the waste is required to immediately notify the Hazardous Waste Program Manager and provide all information about all changes in the waste generation process and chemicals used. After a change in a waste generation process, waste management requirements, may change. After changes in a waste generation process, new waste determination must immediately be made to determine applicable container marking/labeling and disposal requirements.

Waste determinations may be made based upon user knowledge of the chemicals used in the waste generation process. To make a waste determination based on user knowledge, the Primary or Alternate hazardous Waste Manager is required to provide a written and detailed description of the waste generation process, and electronic copies of valid and most current Safety Data Sheets (SDSs) applicable to all chemicals used in the waste generation process. After developing a written description of the waste generation process and all chemicals used, one of the waste managers and the organization UEC must provide certification that the written description is accurate. If the organization does not have a UEC, the Primary or Alternate Hazardous Waste Manager is required to obtain certification of the organization commander/leader, that the description of the waste generation process is accurate.

The Hazardous Waste Program Manager has discretion to require waste generators to provide a written description of any waste generation process and a list of all chemicals used in the process, and Safety Data Sheets (SDSs) as necessary to make a proper waste determination. If the Hazardous Waste Program Manager requests a written description of a waste generation process, either the Primary or Alternate Hazardous Waste Manager and the organization's UEC must provide certification that the written description is accurate. If the organization does not have a UEC, the Primary or Alternate Hazardous Waste Manager is required to obtain certification of the organization commander/leader, that the description of the waste generation process is accurate.

Materials that were used, but that can no longer be used for their intended purpose, must be characterized to determine whether the waste must be managed a HW or non-hazardous waste. The process can change the waste characteristics even when the products used in the process are not HMs (examples are aqueous parts washer wastes, or antifreeze). In this situation, laboratory

analysis of a representative sample of the waste may be required to make a proper waste determination.

Waste management personnel may review waste determinations to determine whether a new waste determination is required.

DRMS Form 1930, Hazardous Waste Profile Sheet (HWPS), documents the results of the evaluation of individual waste streams and HW codes, as applicable. EESOH-MIS may store HWPSs, and interfaces with the DLA-DS database for initiating and tracking waste shipments. EESOH-MIS may also store information used to make waste determination based upon user knowledge.

Waste stream information is stored in EESOH-MIS.

## **11.8 JBER REQUIREMENTS FOR WASTE ACCUMULATION**

JBER does not allow accumulation or storage of HW in containment buildings, on drip pads, or in tanks. Organizations will place waste in containers. Definitions of containment buildings, drip pads, containers, and tanks may be found within 40 CFR § 260.10.

JBER personnel must comply with 40 CFR § 262.15 for accumulation of HW in SAAs, 40 CFR § 262.17 for accumulation of HW in the Hazardous Waste Center, 40 CFR Part 273 for accumulation of UW, and 40 CFR Part 266 Subpart P for accumulation of HW pharmaceuticals.

Except for the Hazardous Waste Center, which is managed by 673 CES/CEIEC, all HW will be accumulated in accordance with regulations applicable to SAAs. No organization or person is allowed to deliver waste to the Hazardous Waste Center apart from UW. UW may be turned-in to the UWAA located at the Hazardous Waste Center Monday through Friday from 1300-1500. The Hazardous Waste Center will not accept delivery of waste from organization personnel. Primary and Alternate Hazardous Waste Managers must contact the Hazardous Waste Center or the Hazardous Waste Program Manager, to request and coordinate delivery of properly marked containers (that are tracked in EESOH-MIS) and removal of waste. The Hazardous Waste Center will deliver properly marked containers that are in good condition, structurally sound, and compatible with the waste to be contained. Only properly appointed and trained Primary and Alternate Hazardous Waste Managers are allowed to request containers for waste accumulation. Labels will be printed from EESOH-MIS and will contain information required to manage the container but not required by regulation. This may include a container number, organization name, Primary or Alternate hazardous Waste Manager's name, waste description, and additional data used to track the container. Organizations will not erase, obscure, or overwrite information on a waste container label unless approved by Hazardous Waste Center personnel or the Hazardous Waste Program Manager.

To establish or relocate a SAA or UWAA, an organization commander/leader will request establishment/relocation by submitting a memo to the Hazardous Waste Program Manager. The memo will identify the proposed location and provide a description of the waste stream(s) the

organization expects to generate. If the organization commander/leader has not appointed a Primary and Alternate Hazardous Waste Manager, the commander/leader will simultaneously make an appointment consistent with Appendix H – Appointment and Training of Primary and Alternate Hazardous Waste Managers. The Hazardous Waste Program Manager will coordinate with the appropriate/appointed Primary and Alternate Hazardous Waste Managers to obtain all information necessary to make a waste determination for each waste stream, and arrange training of the appointed waste managers. In addition, the Hazardous Waste Program Manager may also coordinate with other organizations to address safety, fire prevention, and protection of human health associated with waste accumulation.

#### **11.8.1 WHAT MUST A PRIMARY OR ALTERNATE HAZARDOUS WASTE MANAGER DO WHEN THE ORGANIZATION RECEIVES A CONTAINER FOR HAZARDOUS WASTE?**

- Verify the container has a label marked with the words “Hazardous Waste”.
- Verify the container label properly indicates the hazards of the contents with one or more of the following words applicable to the specific waste: “ignitable”, “toxic”, “corrosive” or “reactive”. If the waste manager has any question, call the Hazardous Waste Center or the Hazardous Waste Program Manager.
- Verify the container can be completely closed.
- Verify the container label has an accurate description of the specific waste the organization will place in the container.
- Verify the container is in good condition.

#### **11.8.2 WHAT MUST A PRIMARY OR ALTERNATE HAZARDOUS WASTE MANAGER DO WHEN ACCUMULATING HAZARDOUS WASTE IN A SATELLITE ACCUMULATION AREA?**

- Place HW in a properly marked container.
- Ensure the container is completely closed except when adding or removing HW.
- Limit HW accumulation to a maximum of 55-gallons for all non-acute HW streams or 1-quart for all liquid acute HW streams, or 1-kilogram for all solid acute HW streams.
- Call the Hazardous Waste Center to arrange waste removal (before exceeding the limits) and delivery of a new container.
- Ensure containers are ready for pickup and suitable for transport to prevent a release of waste.
- Complete and sign a copy of the form within Appendix N – Waste Container Certification Form and affix the complete document (with appropriate information) to each container that will be picked up.
- Mark the date any amount exceeds an applicable limit (55 gallons of non-acute HW, 1 quart of liquid acute HW, or 1 kilogram (2.2 pounds) of solid acute HW) and immediately coordinate with the Hazardous Waste Center to ensure transportation of the HW from the SAA to the Hazardous Waste Center within 3-calendar days.

- Inspect the SAA and document inspections at least once every 7-calendar days.
- Control the SAA and ensure that the organization places waste in a container only when the waste is exactly as described on the container label.
- Ensure waste management is always in compliance with regulatory requirements.
- Train organization personnel how to manage waste properly.

**11.8.3 WHAT MUST A PRIMARY OR ALTERNATE HAZARDOUS WASTE MANAGER, FACILITY MANAGER, OR NON-DELEGATED UW POC DO WHEN THE ORGANIZATION RECEIVES A CONTAINER FOR UNIVERSAL WASTE?**

- Verify the container label includes an appropriate phrase as described within Section 7.4 – Labelling and Marking.
- Verify the container label has the accumulation start date (ASD) populated with the date that the container is being issued.
- Verify the container label has the must be turned into warehouse by date populated with a date no later than 250 days after the ASD.
- Verify the container can be completely closed.
- Verify the container is structurally sound and in good condition.

**11.8.4 WHAT MUST A PRIMARY OR ALTERNATE HAZARDOUS WASTE MANAGER DO WHEN THE ORGANIZATION HANDLES UNIVERSAL WASTE AT A SATELLITE ACCUMULATION AREA?**

- Ensure the container is completely closed, except when adding or removing waste.
- If a container is not full, but contains one or more universal waste items, call the Hazardous Waste Center to schedule a UW removal no later than 250-calendar days from the ASD. This will afford JBER the necessary time to ensure the UW container is shipped off JBER within 365-calendar days from the container's ASD.
- If a container is full, call the Hazardous Waste Center to schedule a UW removal and issuance of a new container with label. Do not wait until the 250<sup>th</sup> day to schedule a UW removal when a container is full.
- Ensure the UW management instruction signage is posted at the SAA, see Appendix I – Universal Waste Accumulation Management Sign.
- Inspect accumulation areas/document inspections, at least every 30-calendar days.
- Control the SAA and ensure that the organization places waste in a container only when the waste is exactly as described on the container label.
- Complete and sign a copy of the form within Appendix N – Waste Container Certification Form and affix the completed document (with appropriate information) to each container that will be picked up.
- Ensure waste is always in compliance with regulatory requirements.
- Train organization personnel how to manage waste properly.

- If mismanaged UW is identified, contact the Hazardous Waste Center, Universal Waste Program Manager, or Hazardous Waste Program Manager for instruction and/or assistance with proper disposal.

#### **11.8.5 WHAT MUST A FACILITY MANAGER OR NON-DELEGATED UW POC DO WHEN THE ORGANIZATION HANDLES UNIVERSAL WASTE (UW MANAGED AT THE UWAA ONLY)?**

- Ensure the container is completely closed, except when adding or removing waste.
- If a container is not full, but contains one or more universal waste items, call the Hazardous Waste Center to schedule a UW removal no later than 250-calendar days from the ASD. This will afford JBER the necessary time to ensure the UW container is shipped off JBER within 365-calendar days from the container's ASD.
- If a container is full, call the Hazardous Waste Center to schedule a UW removal and issuance of a new container with label. Do not wait until the 250<sup>th</sup> day to schedule a UW removal when a container is full.
- Ensure the UW management instruction signage is posted at the accumulation area, see Appendix I – Universal Waste Accumulation Management Sign.
- Inspect the UWAA and document inspections at least once every 30-calendar days.
- Control the UWAA and ensure that the organization places waste in a container only when the waste is exactly as described on the container label.
- Complete and sign a copy of the form within Appendix N – Waste Container Certification Form and affix the completed document (with appropriate information) to each container that will be picked up.
- Ensure waste is always in compliance with regulatory requirements.
- Train organization personnel how to manage waste properly.
- If mismanaged UW is identified, contact the Hazardous Waste Center, Universal Waste Program Manager, or Hazardous Waste Program Manager for instruction and/or assistance with proper disposal.

### **11.9 HAZARDOUS WASTE CENTER REQUIREMENTS**

Regulatory requirements for CAAs are found within 40 CFR § 262.17 and are summarized below.

What must the Hazardous Waste Center do when accumulating hazardous waste?

- Ensure all HW is in a container and marked with the words “Hazardous Waste” or “Hazardous Waste Pharmaceuticals” along with an indication of the hazards of the contents.
- Ensure every container is completely closed except when adding or removing waste.
- Ensure every HW container is marked with an ASD (the date the waste was placed in the Hazardous Waste Center).
- Arrange containers so that labels are readily visible.

- If waste arrives in the central accumulation area on different dates and is later consolidated into a container with waste that arrived on a different date, the ASD placed on the container (into which waste is consolidated) will be the earliest date that any of the waste arrived at the Hazardous Waste Center. The earliest date will be tracked in EESOH-MIS.
- Ensure all personnel working at the Hazardous Waste Center have attended RCRA training within the last 365-calendar days. This includes any individual delivering waste to the Hazardous Waste Center.
- Inspect the Hazardous Waste Center and document the inspections at least once every 7-calendar days in accordance with 40 CFR § 262.17.
- Ensure that waste is exactly as described on the container labels.
- Ensure waste management is always in compliance with regulatory requirements of 40 CFR § 262.17.
- Ensure turn-in documentation is submitted to DLA-DS with sufficient time to arrange for removal of the waste by the initial transporter, for off-site transportation of the HW from the Hazardous Waste Center within 90 days of the ASD. To accomplish this, the Hazardous Waste Center must submit turn-in documentation to DLA-DS no later than the 55th day of accumulation.

## **11.10 UNIVERSAL WASTE ACCUMULATION REQUIREMENTS**

UWAAs will be appropriately designated with the UW management instruction signage, see Appendix I – Universal Waste Accumulation Management Sign, posted at the accumulation area. Only government provided containers are allowed to be utilized for the accumulation of UW. UW containers will be marked/labeled according to the type of universal waste placed in the container. EESOH-MIS generates the appropriate labels to comply with the applicable regulations. On JBER, UW lamp containers will be labeled “Universal Waste – Lamps”; UW battery containers will be labeled “Universal Waste – Batteries”; UW waste mercury-containing equipment containers will be labeled “Universal Waste –mercury-containing equipment”; UW pesticide containers will be labeled “Universal Waste – pesticides”; and UW aerosol can containers will be labeled “Universal Waste-aerosols.” The accumulation time limit for all universal waste on JBER is 365-calendar days. Anyone handling UW on JBER is required to demonstrate the length of time UW has been accumulated. An item becomes a UW on the date the handler discards the item or decides to discard it. All personnel handling UW on JBER must demonstrate the amount of time all UW has been accumulated by placing the ASD on container labels. UW containers will be issued with the ASD populated on the container label with the date that the container is issued. The Primary or Alternate Hazardous Waste Manager, Facility Manager, or non-delegated UW POC is required to call the Hazardous Waste Center to schedule the pickup of UW when: (a) 250-calendar days have lapsed since the container’s ASD; or (b) the UW container is full. This must be done to ensure UW is picked up from the organization, consolidated with other UW, and transported off JBER prior to the 1-year accumulation time limit for UW. JBER personnel will place individual batteries in sealed plastic bags, or cover all

exposed terminals with tape, to prevent short-circuits and comply with transportation regulations. Organizations are responsible for buying supplies and equipment for responding to spills.

## **11.11 UNKNOWN WASTE AND LABELING**

If a waste generation process cannot be determined, such as when a person discovers an unmarked container containing an unknown substance, the substance is an unknown waste. Unknown waste must be managed as a HW until JBER determines the waste is non-hazardous. Anyone discovering unknown waste is required to mark the container with the words “Hazardous Waste pending analysis” and immediately notify the Primary or Alternate Hazardous Waste Manager, the Hazardous Waste Center, and the Hazardous Waste Program Manager. The Hazardous Waste Center and the Hazardous Waste Program Manager will identify additional marking requirements such as an indication of the hazards of the contents, and will coordinate delivery of the waste to the Hazardous Waste Center. Laboratory analysis of a representative sample of unknown waste will be necessary to properly determine the waste characteristics and disposal requirements.

NOTE: Never add waste to a container from which a sample has been obtained; doing so will render the analysis unusable.

## **11.12 REQUIREMENTS APPLICABLE TO ALL ACCUMULATION AREAS**

- No person will place waste in a container when the waste is not generated by the organization to which the container is issued.
- No military, civilian, or contractor personnel on JBER will place household waste into a container issued by the Hazardous Waste Center except for used oil that is turned in to a Used Oil Aggregation Point. The only authorized Used Oil Aggregation Point on JBER is located within the Auto Hobby Shop (Bldg. 755). The Auto Hobby Shop will accept used oil from authorized users of Force Support Squadron facilities only. Used oil will be accepted during business hours, in quantities of 5-gallons or less, and after the generator has completed and signed the form within Appendix Q – Used Oil Certification Statement. At no time, is used oil to be abandoned outside of the Auto Hobby Shop or anywhere on its premises.
- Waste generators are prohibited from placing waste in containers when waste is not exactly as described on the container labels. Placement of waste into a container, when the waste is not exactly as described on a container label, may cause risk to personnel when incompatible waste is mixed, or damage to waste handling equipment. Placement of HW into a container intended for nonhazardous waste or recyclable material may contaminate the contents of the container and render all contents HW, imposing additional risk and cost to JBER. It may also result in a violation of federal regulation applicable to waste determinations, container marking/labeling, and may result in improper disposal. Prohibited actions include, but are not limited to, placement of vehicle

and aircraft parts in waste containers; placement of solvents in containers for other waste such as fuel, oil and antifreeze; and placement of aerosol cans in containers not intended for aerosol cans. If an organization generates waste and does not have a container marked/labeled for the waste, a waste manager will call the central accumulation area to request a container and proper waste determination. If an organization places waste in a container that is not marked/labeled for the waste, the organization may be required to remove the waste if possible. If placement of waste in a container causes a violation of regulation, the Hazardous Waste Program Manager will notify the Primary and Alternate Hazardous Waste Managers, UEC, and/or organization commander/leader.

- SAAs and UWAAAs should be clearly differentiated from other shop activities and other accumulation areas. This may be accomplished by using signage, fencing, storage locker, separate room, paint striping the area, roping the area off, etc.
- SAAs and UWAAAs should be located to prevent the accumulation of ice, snow, or water on the containers, and ensure easy access for organization personnel to place waste in the containers, and for central accumulation area personnel to deliver empty containers and remove waste containers.
- All organizations are required to place signs at all locations in which the organization accumulates waste, using Appendix F – Satellite Accumulation Area Sign. The signs must be posted at all times. Information on the signs must be updated by the organization within 7 calendar days of any change in information.

### **11.13 CONTAINER ISSUANCE AND PICKUP PROCEDURES**

Primary and Alternate Hazardous Waste Managers must contact the Hazardous Waste Center to request and coordinate delivery of properly marked containers, and removal of waste. The Hazardous Waste Center will deliver properly marked containers that are in good condition, structurally sound, and compatible with the waste to be contained. Only properly appointed and trained Primary and Alternate Hazardous Waste Managers are allowed to request containers for accumulation of waste generated by industrial activities. If asked by the JBER Environmental Office, organizations will be required to provide an electronic copy of the most recent version of a valid Safety Data Sheet (SDS) for each specific type of material being disposed. Prior to waste removal, either the Primary or Alternate Hazardous Waste Manager is required to sign a waste container form certifying that waste in each specific container is exactly as described in the container label and no other waste has been placed in the container. Organization waste managers will affix a separate waste container certification form to each container. The waste container certification form is in Appendix N – Waste Container Certification Form, and must include information applicable to the specific container. Containers must be ready for pickup and suitable for transport to prevent a release of waste. Containers must be closed completely. Funnels must be removed. Drum bungs must be tightened. Organizations will provide personnel and equipment (such as a forklift or crane) as required to load waste containers on the vehicle used to pick up waste containers. Waste will not be removed from an organization if a waste container certification form is not signed by an appointed waste manager and affixed to each individual container, or if a container contains waste that is not exactly as described on the

container label. If a container contains waste that is not described on the container label, the primary or alternate waste manager is required to call the Hazardous Waste Center to request a container and label for waste that is not described on the container label in the possession of the organization. Upon delivery of an additional container, the organization is required to place waste in proper containers. Organizations must remain aware that placement of waste in a container, when the waste is not exactly as described on a container label, may cause an unsafe condition, and may be a violation of federal regulations, including, but not limited to, 40 CFR § 262.11, 40 CFR § 262.15, 40 CFR Part 273, and/or 40 CFR Part 266 Subpart P. In addition, placement of waste in a container, when the waste is not exactly as described on a container label, will cause a delay in waste removal, and may cause the organization to exceed an applicable accumulation volume limit or time limit.

Appointment of a Primary or Alternate Hazardous Waste Manager is not required for UWAs where UW is being accumulated within an administrative facility. Anyone in an administrative facility may request a container for UW. The requestor must be present when a container is delivered to receive UW training and sign the form within Appendix P – Universal Waste Acknowledgement of Understanding. This is necessary to meet the federal requirement that all handlers of UW on JBER will be thoroughly familiar with waste handling procedures. The Hazardous Waste Center will remove all UW from an administrative facility within 250-calendar days following delivery of the container.

Important to note, the Hazardous Waste Center may take up to 3-calendar days to deliver a waste container to and/or remove a waste container from a SAA or UWAA. When requesting delivery or removal of a waste container, it is the Primary or Alternate Hazardous Waste Manager, Facility Manager, or non-delegated UW POC's responsibility to contact the Hazardous Waste Center with sufficient time to remain in compliance with federal regulations and this environmental management plan.

## **11.14 WASTE TRANSPORTATION AND DISPOSAL**

The Hazardous Waste Center picks up from generating organizations located throughout JBER and transports the waste back to the facility. The Hazardous Waste Center will package all waste in accordance with regulations applicable to transportation of waste off JBER, and may consolidate waste, from various organizations. Afterward, waste on JBER is transported from the Hazardous Waste Center, by a DLA - DS disposal contractor, to a treatment, storage, or disposal, facility permitted to accept waste from JBER, after completion of waste manifests and other documentation. Transporters will meet federal standards applicable to transporters of HW and universal waste. Defense Transportation Regulation prohibits transportation of HM or HW in privately owned vehicles.

## **11.15 HW MANIFESTS**

All hazardous waste generated on JBER must be transported off JBER, with a Uniform Hazardous Waste Manifest, by a transporter meeting the standards applicable to transporters of

HW, to a facility permitted to accept waste from a LQG. Only a person having authority delegated in writing by the 673d Air Base Wing Commander will sign Uniform Hazardous Waste Manifests and UW shipment records. Manifests will be returned to the Hazardous Waste Program Manager with the handwritten signature of the owner or operator of the designated facility. All records of transportation of universal waste off JBER will be returned to the Hazardous Waste Program Manager.

## **11.16 INSPECTIONS**

Primary or Alternate Hazardous Waste Managers are required to inspect all SAAs at least once every 7-calendar days and UWAA's located within a SAA at least once every 30-calendar days, document inspections using the checklists within Appendix D – Inspection Forms, and keep inspection documentation in their HW Notebook. Electronic copies of documentation are acceptable only if the organization keeps the storage media in the HW Notebook and ensures a working computer is available to view the documentation upon a request of the Hazardous Waste Center, Hazardous Waste Program Manager, or regulatory agency personnel.

Facility Managers are required to inspect all UWAA's in the facility that are not located within an SAA at least once every 30-calendar days, document inspections using the checklists within Appendix D – Inspection Forms, and keep inspection documentation in their UW Notebook. Electronic copies of documentation are acceptable only if the organization keeps the storage media in the UW Notebook and ensures a working computer is available to view the documentation upon a request of the Hazardous Waste Center, Universal Waste Program Manager, Hazardous Waste Program Manager, or regulatory agency personnel.

Per 40 CFR § 262.17(a)(1)(v), at least weekly, the Hazardous Waste Center operator must inspect the Hazardous Waste Center. The individual conducting the inspection must look for leaking containers and for deterioration of containers caused by corrosion or other factors. See paragraph (a)(1)(ii) of 40 CFR § 262.17 for remedial action required if deterioration or leaks are detected. Documentation of central accumulation area inspections will be maintained at the Hazardous Waste Center for 3-years, on the Shared Drive and in a HW Notebook. Inspection documentation must be available for review when requested by the Hazardous Waste Program Manager or regulatory agency personnel.

## **11.17 SPECIFIC WASTE STREAM REQUIREMENTS**

The following subsections provide specific requirements for the management of certain common waste streams at JBER.

### **11.17.1 CONTAMINATED RAGS AND ABSORBENTS**

JBER may be required to manage contaminated rags, and absorbents, as HW, depending upon the substance that contaminated the rag or absorbent. A description of the process and chemicals used to generate the waste rags or absorbents will be necessary to make a proper waste

determination. After a proper waste determination is made, the Hazardous Waste Center will issue containers and labels to properly manage contaminated rags and absorbents. Organizations will not place rags, or absorbents in containers that are not marked for the specific rags or absorbents.

Organizations will not place rags, or absorbents, contaminated with one chemical, in a container for other HW, or non-hazardous waste. Doing so may cause a violation of federal regulation, unsafe condition, or may make an entire container HW. Organizations will request containers for specific waste rags and absorbents and will not mix waste streams. Contact the central accumulation area or the HW Program Manager for information. See Appendix M – Points of Contact for contact information.

### **11.17.2 OIL AND FUEL FILTERS**

Depending upon material of construction, filters may or may not be managed as HW. Terne-plated filters contain a tin/lead alloy and must be managed as HW. Other filters, such as fuel filters, transmission oil filters may exhibit hazardous characteristics. Contact the Hazardous Waste Center or Hazardous Waste Program Manager for more information.

### **11.17.3 PAINT BOOTH FILTERS**

Paint booth filters may be hazardous and laboratory analysis may be required to make a proper waste determination. Contact the Hazardous Waste Center or the Hazardous Waste Program Manager for information about how to make a proper waste determination for paint booth filters.

### **11.17.4 MUNITIONS**

JBER explosive ordnance disposal personnel may destroy munitions on JBBER without an EPA permit only during a documented training exercise or emergency response. An EPA permit is required to destroy munitions when the destruction is not part of a training exercise or emergency response. Contact the Hazardous Waste Center or Hazardous Waste Program Manager for information.

### **11.17.5 MIXED WASTE**

Mixed waste consists of waste containing HW and radioactive material. It is not common to generate mixed waste on JBBER. However, if an organization generates or discovers mixed waste, immediately contact the Bioenvironmental Engineering Office Radiation Safety Officer and the Hazardous Waste Program Manager, who will ensure disposal in accordance with HW regulations and the Atomic Energy Act. Contact information is located within Appendix M – Points of Contact.

### **11.17.6 AEROSOL CANS**

Aerosol cans must be managed in accordance with federal regulations and this environmental management plan when the cans are disposed of or, once no longer useable, are stored before or in lieu of being abandoned. A used aerosol can becomes a waste on the date it is discarded. An unused aerosol can becomes a waste on the date the handler decides to discard it. Organizations will not discard waste aerosol cans in places including, but not limited to, supply closets, garbage cans, dumpsters, material storage cabinets/lockers, or other works areas. An aerosol can that is unusable, because the nozzle is broken and will not be used, or because contents have been used to the maximum extent practicable, will be managed as UW in a properly marked container.

### **11.17.7 FLUORESCENT LAMPS**

All waste fluorescent lamps will be managed as UW and must be placed in containers meeting specific regulatory requirements applicable to UW lamps as described within this environmental management plan. A fluorescent lamp, which will not be used (even if it is useable), must be managed as a UW lamp, in the same manner as a fluorescent lamp that is unusable.

### **11.17.8 USED OIL**

Anything that contains used oil, must be marked with the words “Used Oil”. This applies, but is not limited to, tanks, drums, buckets, fill pipes, transfer pipes and drain pans. Failure to do so is a violation of 40 CFR 279. See Appendix J – Used Oil Management for additional used oil requirements.

### **11.17.9 BATTERIES**

All waste battery types described below, will be managed as UW batteries, and will be placed in containers meeting specific regulatory requirements applicable to UW batteries as described within this environmental management plan. A battery that will not be used must be managed as a UW battery, in the same manner as a battery that is unusable.

- lithium batteries;
- nickel-metal hydride batteries;
- nickel-cadmium batteries; and
- all rechargeable batteries.

Alkaline batteries are not to be managed as UW or HW and may be disposed of as solid waste. Pay special attention when disposing of alkaline batteries as many non-alkaline batteries look very similar to alkaline batteries. Prior to disposing an alkaline battery, ensure the battery is clearly marked with a manufacture’s label indicating it is an alkaline battery. If there is any doubt, contact the Hazardous Waste Center, Universal Waste Program Manager, or Hazardous Waste Program Manager.

Lead acid batteries on JBER are recycled through DLA-DS. All used lead acid batteries will be marked as “Recyclable Material.”

### **11.17.10 TONER CARTRIDGES**

Personnel will recycle printer toner cartridges using the instructions provided by the manufacturers of the cartridges, and in the boxes in which the cartridges are sold. The Hazardous Waste Center will not issue containers for, or accept delivery of, toner cartridges.

### **11.18 WASTE GENERATED BY CONTRACTORS ON JBER**

JBER will issue containers for, and manage, HW and UW generated by contractors when all of the following apply:

- There are no fiscal limitations (such as when a project is funded by the MILCON program);
- There is no conflict with an applicable contract;
- The contractor complies with this environmental management plan and obtains approval for all HM transported to JBER, prior to bringing HM to JBER; and
- The contractor complies with all applicable requirements of this environmental management plan.

If a contractor does not fully comply with this environmental management plan, and all applicable requirements of it, the contractor will be solely responsible for paying for, and providing, containers, labels, and waste transportation, treatment/storage/disposal. If JBER issues containers for, or manages waste generated or handled by a contractor, and a contractor does not fully comply with this environmental management plan, the Hazardous Waste Program Manager will notify the applicable contracting officer and the contractor’s representative that signed the contract and will stop providing containers and labels for waste generated or handled by the specific contractor. However, regulatory requirements will always apply to management of waste generated and handled by contractors.

Contractors are responsible for all spill cleanup costs (and associated waste disposal), and all enforcement actions and penalties, which arise from, or relate to contractor conduct. Responsibility may result in an equitable adjustment to an applicable contract, establishment of contractor debt, or resolution through any remedy available.

## 12 **REFERENCES**

U.S. Environmental Protection Agency. (1980, April). *A method for determining the compatibility of hazardous wastes*. <https://www.epa.gov/sites/default/files/2016-03/documents/compat-haz-waste.pdf>

U.S. Environmental Protection Agency. (2023, January 3). *Universal waste*. <https://www.epa.gov/hw/universal-waste#:~:text=Examples%20of%20common%20universal%20waste%20electric%20lamps%20include%2C,are%20not%20hazardous%20waste%20are%20not%20universal%20wastes.>

# **Waste Analysis Plan**

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## **Waste Analysis Plan**

See Section 11.7 for JBER-specific Waste Analysis Plan information.

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# **Hazardous Waste Streams/Profiles**

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## Hazardous Waste Streams/Profiles

JBER maintains waste site information and organization information in EESOH-MIS. This information changes frequently. Waste stream information in EESOH-MIS includes, but is not limited to, the information shown in Table 1: Example of EESOH-MIS Waste Stream Inventory.

Table 1: Example of EESOH-MIS Waste Stream Inventory.

Shop Code	Waste Site Number	Waste Site Active Indicator	Waste Site Location	Waste Stream Number	Waste Stream Description
FR0013	98TH MAINTENANCE	Y	00798-A	BA0007	UNIVERSAL WASTE BATTERIES, LITHIUM
FR0013	98TH MAINTENANCE	Y	00798-A	BA0010	UNIVERSAL WASTE BATTERIES, NICAD WET
FR0013	98TH MAINTENANCE	Y	00798-A	FC0004	ABSORBENTS CONTAMINATED WITH LIQUID
FR0013	98TH MAINTENANCE	Y	00798-A	FC0005	ABSORBENTS CONTAMINATED SOLID
FR0013	98TH MAINTENANCE	Y	00798-A	FC0057	USED ANTIFREEZE-D008
FR0013	98TH MAINTENANCE	Y	00798-A	FC0063	USED OIL WITH ANTIFREEZE - D008
E0061	3 MXS/MXMFSL2	Y	9696 Hangar 22	ES0012	AMINES LIQUID CORROSIVE
E0061	3 MXS/MXMFSL2	Y	9696 Hangar 22	ES0038	CORROSIVE LIQUID ACIDIC INORGANIC
E0061	3 MXS/MXMFSL2	Y	9696 Hangar 22	ES176	RTV88 aka Tin Catalyst (DBT)
E0061	3 MXS/MXMFSL2	Y	9696 Hangar 22	ES183	CAAPCOAT ACETONE ACCELERATOR
E0061	3 MXS/MXMFSL2	Y	9696 Hangar 22	PO0038	DEBRIS AND RAGS CONTAMINATED WITH SOLV

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# **Hazardous Waste Training Plan**

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## **Hazardous Waste Training Plan**

See Section 5.5 for JBER-specific HW training plan information.

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# Inspection Forms

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## **Inspection Forms**

Inspection checklists are applicable to the accumulation of HW and UW within SAAs and UW within UWAAs. Electronic copies of inspection documentation are acceptable in accordance with Sections 11.4, 11.5, and 11.16.

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# Inspection Forms

**CHECKLIST APPLICABLE TO ACCUMULATION OF HAZARDOUS WASTE IN SATELLITE ACCUMULATION AREAS**

Inspections required every 7 calendar days. Maintain documentation for 3 years.

EESOH-MIS waste site: \_\_\_\_\_ Organization: \_\_\_\_\_

Building #/room #/common name: \_\_\_\_\_

	Yes	No	Notes
Is all HW in a container? (If there is no HW, answer "Yes", write "no HW" in the "Notes" field, and do not answer the other questions.) 40 CFR 262.15(a)			
Is the amount of each separate HW stream equal to, or less than, 55 gallons? 40 CFR 262.15(a)			
Are containers at or near the point of generation of HW? 40 CFR 262.15(a)			
Is the waste under control of the operator of the process generating the waste? 40 CFR 262.15(a)			
If the amount of HW is greater than 55 gallons, is the accumulation start date marked on the container containing the amount in excess of 55 gallons? 40 CFR 262.15(a)(6)			
Has the amount of HW, which is in excess of 55 gallons, been accumulated for three fewer consecutive calendar days? (If the amount is 55 gallons or less, check "Yes", and write "No excess" in the "Notes" field. 40 CFR 262.15(a)(6)			
Are all containers in good condition and free of leaks? 40 CFR 262.15(a)			
Are all containers closed during storage except when it is necessary to add, remove or consolidate waste, or when temporary venting is necessary (for proper operation of equipment or to prevent dangerous situations such as build-up of extreme pressure)? 40 CFR 262.15(a)(4)			
Are all containers marked or labeled with words "Hazardous Waste"? 40 CFR 262.15(a)(5)			
Are all containers, containing HW, marked or labeled with an indication of the hazards of the contents? 40 CFR 262.15(a)(5)			
Are all container contents exactly as described on the container label? (Placement of dissimilar waste, or waste that is not described on the container label, may cause an unsafe condition and may be a violation of 40 CFR 262.11, 40 CFR 262.15)			
Additional information			

\_\_\_\_\_  
Inspector's printed name

\_\_\_\_\_  
Inspector's signature

\_\_\_\_\_  
Date

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# Inspection Forms

**CHECKLIST APPLICABLE TO ACCUMULATION OF UNIVERSAL WASTE LAMPS (BULBS/TUBES)**

Inspections required every 30 calendar days. Maintain documentation for 3 years.

EESOH-MIS waste site: \_\_\_\_\_ Organization: \_\_\_\_\_

Building #/room #/common name: \_\_\_\_\_

	Yes	No	Notes
Are all waste lamps contained in containers or packages? (If the organization has not accumulated waste lamps in any location (including closets, bathrooms, offices, supply rooms, warehouses, mechanical rooms, vehicles, basements, attics and any other location) answer "Yes", write "no waste lamps" in the "Notes" field, and do not answer the other questions.) 40 CFR 273.33(d)(1)			
Are all containers or packages structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps? 40 CFR 273.33(d)(1)			
Are all containers or packages closed? 40 CFR 273.33(d)(1)			
Do all containers or packages lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions? 40 CFR 273.33(d)(1),			
Are all <u>broken lamps</u> , or any lamp that shows evidence of breakage, leakage, or damage that could cause a release of mercury or other hazardous constituents to the environment, immediately cleaned up and placed in a container? 40 CFR 273.33(d)(2)			
Are all containers (with <u>broken lamps</u> , or any lamp that shows evidence of breakage, leakage, or damage) closed? 40 CFR 273.33(d)(2)			
Are all containers (with <u>broken lamps</u> , or any lamp that shows evidence of breakage, leakage, or damage) structurally sound and compatible with the contents of the lamps? 40 CFR 273.33(d)(2)			
Do all containers (with <u>broken lamps</u> , or any lamp that shows evidence of breakage, leakage, or damage) lack evidence of leakage, spillage, or damage that could cause a release of mercury or other hazardous constituents? 40 CFR 273.33(d)(2)			
Is each lamp, or each container containing a lamp, labeled or marked clearly with the following phrase: "Universal Waste—Lamp(s)"? 40 CFR 273.34(e)			
Has the organization demonstrated the length of time the waste lamps have been accumulated, by marking an accumulation start date on each lamp or on each container? 40 CFR 273.35(c)			
Have all universal waste lamps been accumulated for one year or less? 40 CFR 273.35(a)			
Have all employees handling universal waste lamps been trained to be thoroughly familiar with proper waste lamp handling and			

# Inspection Forms

emergency procedures relative to their responsibilities during normal facility operations and emergencies? 40 CFR 273.36			
Are all container contents exactly as described on the container label? (Placement of dissimilar waste, or waste that is not described on the container label, may cause an unsafe condition and may be a violation of 40 CFR 262.11, 40 CFR 262.15, and/or 40 CFR 273.)			
Additional information			

\_\_\_\_\_  
Inspector's printed name

\_\_\_\_\_  
Inspector's signature

\_\_\_\_\_  
Date

# Inspection Forms

**CHECKLIST APPLICABLE TO ACCUMULATION OF UNIVERSAL WASTE BATTERIES**

Inspections required every 30 calendar days. Maintain documentation for 3 years.

EESOH-MIS waste site: \_\_\_\_\_ Organization: \_\_\_\_\_

Building #/room #/common name: \_\_\_\_\_

	Yes	No	Notes
Are all damaged or leaking waste batteries contained in containers? 40 CFR 273.33(a)(1)			
Are all containers (with damaged or leaking batteries) closed? 40 CFR 273.33(a)(1)			
Do all containers (with damaged or leaking batteries) lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions? 40 CFR 273.33(a)(1)			
Is each battery, or each container in which a battery is contained, labeled or marked clearly with the following phrase: "Universal Waste—Battery(ies)?" 40 CFR 273.34(a)			
Is the organization able to demonstrate the length of time the universal waste batteries have been accumulated, by marking an accumulation start date on each container containing a battery? 40 CFR 273.35(c)			
Have all universal waste batteries been accumulated for one year or less? 40 CFR 273.35(a)			
Have all employees handling universal waste batteries been trained to be thoroughly familiar with proper waste battery handling and emergency procedures relative to their responsibilities during normal facility operations and emergencies? 40 CFR 273.36			
Are all container contents exactly as described on the container label? (Placement of dissimilar waste, or waste that is not described on the container label, may cause an unsafe condition and may be a violation of 40 CFR 262.11, 40 CFR 262.15, and/or 40 CFR 273.)			
Additional information			

\_\_\_\_\_  
Inspector's printed name

\_\_\_\_\_  
Inspector's signature

\_\_\_\_\_  
Date

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# Inspection Forms

**CHECKLIST APPLICABLE TO ACCUMULATION OF UNIVERSAL WASTE AEROSOL CANS**

Inspections required every 30 calendar days. Maintain documentation for 3 years.

EESOH-MIS waste site: \_\_\_\_\_ Organization: \_\_\_\_\_

Building #/room #/common name: \_\_\_\_\_

	Yes	No	Notes
Are all aerosol cans, showing evidence of leakage, packaged in a separate container or overpacked with absorbents? 40 CFR 273.33(e)(2)			
Are all containers (with leaking aerosol cans) closed? 40 CFR 273.33(e)(2)			
Do all containers (with aerosol cans) lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions and is the container protected from sources of heat? 40 CFR 273.33(e)(1)			
Is each aerosol can, or each container in which an aerosol can is contained, labeled or marked clearly with the following phrase: "Universal Waste—Aerosol Can(s)?" 40 CFR 273.34(f)			
Is the organization able to demonstrate the length of time the universal waste aerosol can(s) have been accumulated, by marking an accumulation start date on each can, or each container containing a can? 40 CFR 273.35(c)			
Have all universal waste aerosol cans been accumulated for one year or less? 40 CFR 273.35(a)			
Have all employees handling universal waste cans been trained to be thoroughly familiar with proper waste aerosol can handling and emergency procedures relative to their responsibilities during normal facility operations and emergencies? 40 CFR 273.36			
Are all container contents exactly as described on the container label? (Placement of dissimilar waste, or waste that is not described on the container label, may cause an unsafe condition and may be a violation of 40 CFR 262.11, 40 CFR 262.15, and/or 40 CFR 273.)			
Additional information			

\_\_\_\_\_  
Inspector's printed name

\_\_\_\_\_  
Inspector's signature

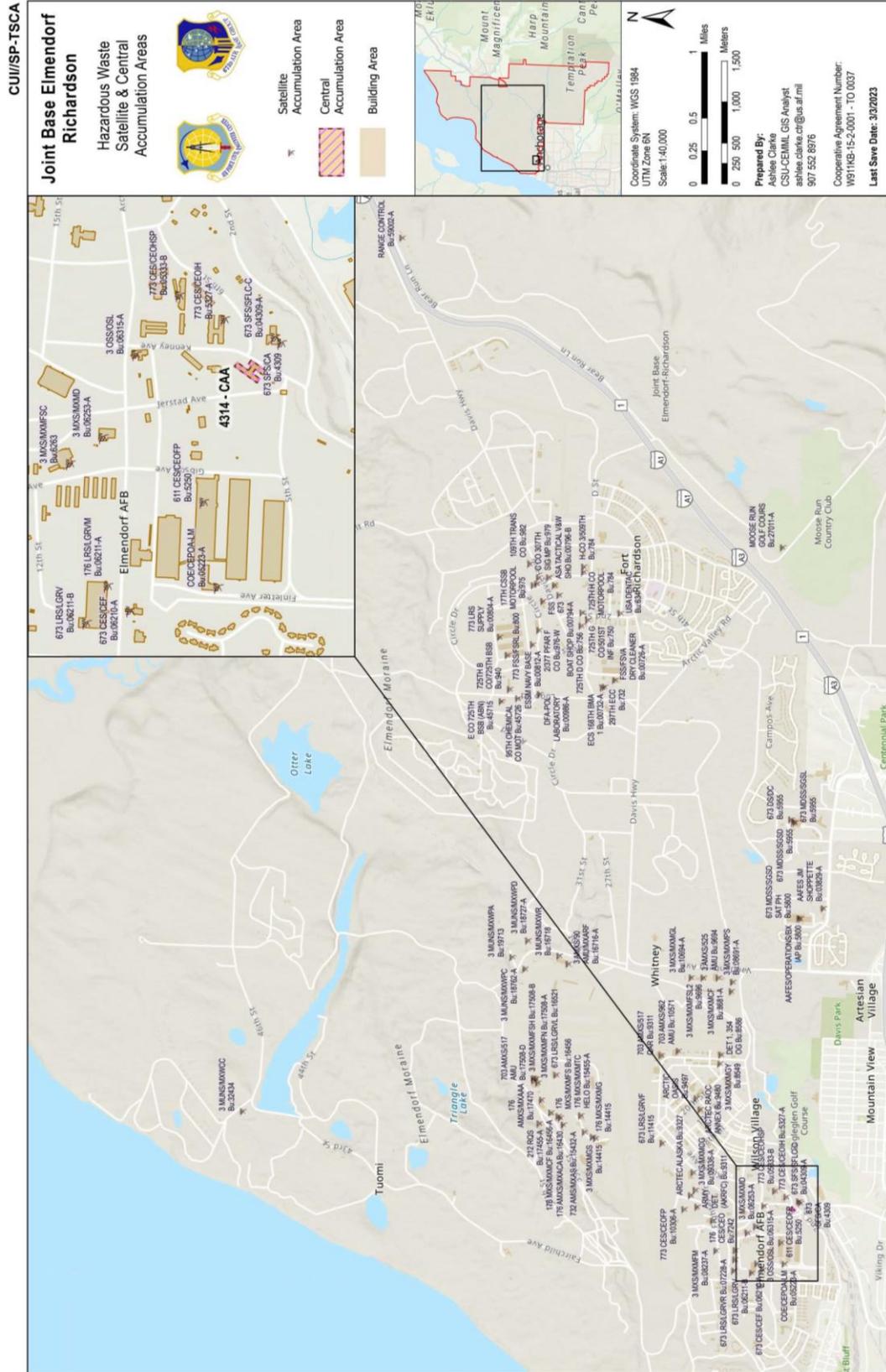
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Date

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# Base Map

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# Base Map



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# **Satellite Accumulation Area Sign**

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## Satellite Accumulation Area Sign

<u>Organization:</u>		
<u>Commander/Senior Leader:</u>		<u>Email Address:</u>
<u>Building #:</u>	<u>Room #:</u>	<u>Common Name:</u>
<u>EESOH-MIS Waste Site Number and Type:</u>		
<u>Primary Hazardous Waste Manager:</u>		<u>Telephone Number:</u>
<u>Primary Hazardous Waste Manager E-mail Address:</u>		
<u>Primary Hazardous Waste Manager Last Training Date:</u>		
<u>Primary Hazardous Waste Manager Training Due Date:</u>		
<u>Alternate Hazardous Waste Manager:</u>		<u>Telephone Number:</u>
<u>Alternate Hazardous Waste Manager E-mail Address:</u>		
<u>Alternate Hazardous Waste Manager Last Training Date:</u>		
<u>Alternate Hazardous Waste Manager Training Due Date:</u>		
<u>HW Program Manager: M. Alex Cierlitsky / (907) 384-3322 / <a href="mailto:matthew.cierlitsky@us.af.mil">matthew.cierlitsky@us.af.mil</a></u>		
<u>Alternate HW Program Manager: Kimberly Pergola / (907) 384-3419 / <a href="mailto:kimberly.pergola.1@us.af.mil">kimberly.pergola.1@us.af.mil</a></u>		
<u>JBER HW Center: (907) 552-3435 or <a href="mailto:673CES.CEIEC.HazardousWaste@us.af.mil">673CES.CEIEC.HazardousWaste@us.af.mil</a></u>		

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# **HW Compatibility**

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## **Hazardous Waste Compatibility**

Certain hazardous wastes, when mixed, are harmful to human health and the environment. Incompatible hazardous wastes can produce heat, fire, flammable and/or toxic gasses, or even an explosion. It is a hazardous waste generator's responsibility to ensure all incompatible hazardous wastes are appropriately segregated. The EPA's Hazardous Wastes Compatibility Chart and the Naval Safety and Environmental Training Center's Compatibility Chart are two quick reference guides that can be used to determine the compatibility of most hazardous wastes.

### **Procedures for using the EPA's Hazardous Wastes Compatibility Chart**

#### **Step 1:**

Using the Reactivity Group Names, identify the Reactivity Group Number for the first group.

#### **Step 2:**

Using the Reactivity Group Names, identify the Reactivity Group Number for the second group.

#### **Step 3:**

Find the intersecting reaction square for the two Reactivity Group Numbers and note any reaction codes within the square. The absence of a reaction code means the binary hazardous wastes are compatible. Whereas the presence of a reaction code means the binary hazardous waste are incompatible.

#### **NOTE:**

When multiple reaction codes are present within a reaction square, the order in which they appear directly corresponds to the order in which the consequences may occur.



# Hazardous Waste Compatibility

## Procedures for using the Naval Safety and Environmental Training Center's Compatibility Chart

### Step 1:

Using the Group Names, locate the first group of hazardous materials.

### Step 2:

Determine if the Hazardous Material User's Guide (HMUG) Group number for the second group is annotated within the "Incompatible Materials" block.

### Step 3:

The presence of the second group's HMUG Group number within the "Incompatible Materials" block means the two hazardous materials are incompatible. Review the "Reaction if Mixed" block for the possible types of reactions.

### Step 4:

The absence of the second group's HMUG Group number within the "Incompatible Materials" block means the two hazardous materials are compatible.

# Hazardous Waste Compatibility



## NAVOSHENVTRACEN COMPATIBILITY CHART



HMUG GROUP	HCC see note 2	GROUP NAME	EXAMPLES	INCOMPATIBLE MATERIALS	EXAMPLES	REACTION IF MIXED
1	C1, C2, C4, C5	ACIDS	Battery Acid Paint Removers De-Rust Spray	FLAMMABLES/ COMBUSTIBLES ALKALIS/BASES/CAUSTICS OXIDIZERS (HMUG Groups 2, 3, 4, 6, 7, 9, 10, 11, 12, 13, 14, 15, 17, 18, 19, 20, 22)	Degreasers, Carbon Removers, Anti-Fogging Compounds	HEAT Gas Generation VIOLENT REACTION
2	F1 to F7, P1, T6, V5, V4	ADHESIVES	Epoxies Isocyanates Diethylenetriamine	ACIDS ALKALIS/BASES/CAUSTICS OXIDIZERS (HMUG Groups 1, 3, 18)	Battery acid, Paint Removers, De-Rust Sprays, Paints, Solvents	HEAT FIRE HAZARD
3	B1, B2	ALKALIES BASES/ CAUSTICS	Ammonia Sodium Hydroxide Cleaners	ACIDS/OXIDIZERS FLAMMABLES/COMBUSTIBLES (HMUG Groups 1, 2, 6, 8, 9, 10, 11, 14, 17, 18, 20, 22)	Battery acid, Paint Removers, De-Rust Sprays, Paints, Solvents	HEAT Gas Generation VIOLENT REACTION
4	C1-C4, B1-B3, F2 to F7, T4, T6, V2-V4	CLEANING COMPOUNDS	Degreasers Carbon Removers Antifogging Compounds	DETERGENTS/SOAPS OXIDIZERS (HMUG Groups 1, 7, 18)	Calcium Hypochlorite, Sodium Nitrite, Hydrogen Peroxide	HEAT FIRE HAZARD
5	G1 to G9	COMPRESSED GASES	Acetylene, Propane, Nitrogen, Argon, Helium, Oxygen	HEAT SOURCES Consult paragraph C23 for specific handling and stowage guidance (HMUG Groups 8, 9, 10, 11, 12, 15, 18, 19)		FIRE HAZARD EXPLOSION HAZARD
6	F2 to F5, T6, V2, V3, V4	CORROSION PREVENTIVE COMPOUNDS	Corrosion Inhibitors Chemical Conversion Compounds	ACIDS/BASES OXIDIZERS IGNITION SOURCES (HMUG Group 1, 3, 18, 20)		FIRE HAZARD
7	B3	DETERGENTS/ SOAPS	Trisodium Phosphate Scouring Powders Disinfectants	ACID-CONTAINING COMPOUNDS (HMUG Groups 1, 4, 18)	Battery Acid, Paint Removers, De-Rust Sprays	VIOLENT REACTION HEAT
8	F8, V6, V7	GREASES	Lithium Grease Silicone Molybdenum	OXIDIZERS ALKALIS/BASES/CAUSTICS (HMUG Groups 3, 5, 18)		FIRE HAZARD HEAT
9	T6, V4, V6, V7	HYDRAULIC FLUIDS	Petroleum-Based Synthetic Fire-Resistant	CORROSIVES, OXIDIZERS (HMUG Groups 1, 3, 5, 18)		VIOLENT REACTION
10	F2 to F4, T4, T6, V2-V6	INSPECTION PENETRANTS	Petroleum-Based Dyes	CORROSIVES, OXIDIZERS (HMUG Groups 1, 3, 5, 18)	Battery Acid Caustic Soda Chlorine laundry bleach Calcium Hypochlorite OBA Canisters Hydrogen Peroxide Paint Removers	HEAT FIRE HAZARD EXPLOSION HAZARD
11	F4, T6, V2, V3, V4, V6	LUBRICANTS/ OILS	General Purpose, Gear, Turbine, Weapons	CORROSIVES, OXIDIZERS (HMUG Groups 1, 3, 5, 18)		HEAT FIRE HAZARD
12	F2 to F6, P1, T3, T4, T6, V1-V4	PAINT MATERIALS	Primers, Enamels, Urethanes, Lacquers, Varnishes, Non-Skid, Thinners	ACIDS, OXIDIZERS (HMUG Groups 1, 5, 18)		HEAT FIRE HAZARD
13	C1-C4, B1-B3, D1	PHOTO CHEMICALS	Developers, Stopbath, Toners, Bleaches, Replenishers	ACIDS HEAVY METALS (HMUG Groups 1, 18, 20)		HEAT FIRE HAZARD
14	F4	POLISH/WAX COMPOUNDS	Buffing Compounds Metal Polishes General Purpose Waxes	CORROSIVES OXIDIZERS (HMUG Groups 1, 3, 18)		HEAT, FIRE HAZARD VIOLENT REACTION
15	F2 to F6, T3, T4, T6, V1, V4	SOLVENTS	Methyl Ethyl Ketone (MEK) Toluene, Xylene Acetone	CORROSIVES OXIDIZERS BATTERIES (HMUG Groups 1, 5, 18, 21, 22)	Battery Acid Calcium Hypochlorite Sodium Nitrite Sodium Hydroxide	HEAT FIRE HAZARD
16	T6, T7, Z1	THERMAL INSULATION	Asbestos Fiberglass Glass Wool	MATERIAL IS NOT REACTIVE KEEP DRY		NO REACTION
17	C1-C4, B1-B3, D1	WATER TEST/ TREATMENT CHEMICALS	Nitric Acid Mercuric Nitrate Caustic Soda	CORROSIVES OXIDIZERS HEAVY METALS (HMUG Groups 1, 3, 18, 20, 21)		HEAT VIOLENT REACTION
18	D1 to D4	OXIDIZERS	Calcium Hypochlorite Laundry Bleach OBA Canisters	PETROLEUM BASED MATERIALS FUELS, SOLVENTS, CORROSIVES, HEAT (HMUG Groups 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 17, 19, 20, 21, 22)		FIRE HAZARD VIOLENT REACTION EXPLOSION HAZARD TOXIC GAS GENERATION
19	F1 to F4, V4, V5, V6	FUELS	JP4, JP5 Gasoline Diesel Fuel	CORROSIVES OXIDIZERS (HMUG Groups 1, 3, 5, 18)	Battery Acid Calcium Hypochlorite Sodium Nitrite Sodium Hydroxide	FIRE HAZARD TOXIC GAS GENERATION
20	T6, V7, Z2	HEAVY METALS	Mercury Lead Beryllium	CORROSIVES OXIDIZERS WATER TREATMENT/PHOTO CHEMICALS (HMUG Groups 1, 3, 6, 13, 17, 18, 21)		VIOLENT REACTION GENERATION OF TOXIC AND FLAMMABLE GAS
21	Z4 to Z7	BATTERIES	Lead-Acid Dry-Cell Alkaline	SOLVENTS HEAVY METALS OXIDIZERS (HMUG Groups 15, 17, 18, 20)	Xylene Toluene Alcohol	HEAT VIOLENT REACTION TOXIC GAS GENERATION
22	T2 to T6	PESTICIDES	Insecticides, Fungicides Rodenticides Fumigants	CORROSIVES OXIDIZERS (HMUG Groups 1, 3, 15, 18)		TOXIC GAS GENERATION

- This chart is to be used as a **GUIDE ONLY!**
- Compare the desired HMUG Group/HCC in the left column with the Incompatible Material(s) of that Group in the center column on the same row. Mixing of the HMUG Group/HCC with the Incompatible Material(s) may result in the reaction(s) listed in the right column.
- Not all applicable HCCs are listed; only the most frequently encountered HCCs (except N1) are listed.

[www.safetycenter.navy.mil/training](http://www.safetycenter.navy.mil/training)

REV 09-03

NOTE. Adapted from 2003 NAVOSHENVTRACEN Compatibility Chart, by Naval Safety and Environmental Training Center, 2003 (<https://trainex.org/osc2012/uploads/541/IncompatibleMaterials.pdf>). In the public domain.

# **Appointment and Training of Primary and Alternate Hazardous Waste Managers**

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## **Appointment and Training of Primary and Alternate Hazardous Waste Managers**

All organizations are required to appoint a Primary and Alternate Hazardous Waste Manager regardless of whether the organization knowingly generates waste or believes it will not generate HW or UW. Commanders/leaders must appoint Primary and Alternate Hazardous Waste Managers using the Appointment of Primary and Alternate Hazardous Waste Managers form within this appendix. Contact the Hazardous Waste Program Manager for a version of this form that can be completed electronically. The organization appointing authority may appoint two Alternate Hazardous Waste Program Managers. Organization commanders/leaders, or Unit Environmental Coordinators, are required to ensure the appointed Primary and Alternate Hazardous Waste Managers within 60-days of appointment.

Primary and Alternate Hazardous Waste Managers are required to maintain documentation of training in a HW Notebook at the SAA for 3-years and must provide documentation of training upon request made by JBER environmental staff or regulatory agency personnel.

Organization commanders/leaders must appoint a Primary and Alternate Hazardous Waste Manager for each location at which waste is accumulated. The appointments must indicate the specific location(s) each Primary and Alternate Hazardous Waste Manager is responsible for managing. Only one appointment letter will be valid for each location in which waste is accumulated. If one the Primary or Alternate Hazardous Waste Manger is replaced, the new appointment must also include any Primary or Alternate Hazardous Waste Manager that will not be replaced.

The appointing authority for all Air Force organizations is a Squadron Commander or someone in a position with higher command authority. The appointing authority for all Army organizations is a Company Commander or someone in a position with higher command authority. The appointing authority for other military branches on JBER, is the organization's first position with command authority over the organization's operations on JBER. The appointing authority for appointing a contractor as a Primary or Alternate Hazardous Waste Manager, is the contractor's representative that signed the contract. Appointing authority may not be delegated. No appointment will be valid unless it is made by someone in a position with authority described above. A Primary Hazardous Waste Manager must be an E-5 (military)/GS-09 (civilian) or above. There is no rank requirement for an Alternate Hazardous Waste Manager. If a position with appointing authority is not filled, the appointments must be made by a person in position with higher authority. If a person makes valid appointments and leaves the position, the new organization commander/leader is required to re-appoint the Primary and Alternate Hazardous Waste Managers within 15-calendar days, regardless of whether the Primary or Alternate Hazardous Waste Managers will remain the same.

Each organization is required to provide, to the JBER Hazardous Waste Program Manager, electronic copies of documentation of all appointments.

Organizations and contractors are prohibited from generating waste unless the organization or contractor has specifically appointed a Primary and Alternate Hazardous Waste Manager and ensures they have attended training. If an organization has waste containers and is without an

## **Appointment and Training of Primary and Alternate Hazardous Waste Managers**

appointed and trained Primary and Alternate Hazardous Waste Manager, the JBER Hazardous Waste Program Manager will remove all waste containers from the organization and will inform the organization commander/leader, and JBER leadership personnel as appropriate. The JBER Hazardous Waste Program Manager will not issue containers to any organization that does not have an appointed and trained Primary and Alternate Hazardous Waste Program Manager.

## **Appointment and Training of Primary and Alternate Hazardous Waste Managers**

Organization/Contractor: \_\_\_\_\_ Building #: \_\_\_\_\_ Date: \_\_\_\_\_

Contract # (if applicable): \_\_\_\_\_ Contract title: \_\_\_\_\_

Accumulation area room # or common name when applicable: \_\_\_\_\_

Additional information: \_\_\_\_\_

Commanders/leaders, of all organizations (military, civilian, tenant, and contractor) are responsible for:

- 1) Proper management of waste their organization generates or handlers;
- 2) Appointment a Primary and Alternate Hazardous Waste Manager, regardless of whether the organization knowingly generates HW or believes it will not generate HW;
- 3) Ensuring the appointed Primary and Alternate Hazardous Waste Managers attend initial training within 60-days of appointment;
- 4) Ensuring Primary and Alternate Hazardous Waste Managers take part in an annual review of initial training (also known as refresher training) no more than 365-days from the date of previous training;
- 5) Appointing a Primary and Alternate Hazardous Waste Manager within 15-calendar days of the date a previously appointed Primary or Alternate Hazardous Waste Manager will no longer serve;
- 6) Compliance at all times, and for ensuring Primary and Alternate Hazardous Waste Managers inspect SAAs, and document inspections, as required by this environmental management plan; and
- 7) Ensuring funding is available for the purchase of spill response supplies and equipment, and for the costs of spill response and associated waste disposal.

Government Primary Hazardous Waste Managers must be an E-5 (military)/GS-09 (civilian) (or equivalent) or above. JBER's Hazardous Waste Management Plan describes Primary and Alternate Hazardous Waste Manager responsibilities.

When a commander/leader changes, the new organization commander/leader is required to appointment a Primary and Alternate Hazardous Waste Manager within 15-calendar days, regardless of whether the Primary and Alternate Hazardous Waste Managers will remain the same.

If a regulatory agency takes enforcement action resulting from a violation of HW regulations, the organization causing the violation is responsible for implementing corrective action and potentially for associated financial penalties that may be imposed by the regulatory agency.

Appointing authority (may not be delegated): Air Force – Squadron Commander; Army – Company Commander; other military – first position with command authority over operations on JBER; civilian – first position with control of all the organization's operations on JBER; contractor – contractor's representative that signed the contract.

## **Appointment and Training of Primary and Alternate Hazardous Waste Managers**

This appointment supersedes all earlier appointments for the specific SAA described above.

Primary Hazardous Waste Manager's name: \_\_\_\_\_ Rank/grade: \_\_\_\_\_

E-mail address: \_\_\_\_\_ Telephone #: \_\_\_\_\_

Alternate Hazardous Waste Manager's name: \_\_\_\_\_ Rank/grade: \_\_\_\_\_

E-mail address: \_\_\_\_\_ Telephone #: \_\_\_\_\_

Alternate Hazardous Waste Manager's name: \_\_\_\_\_ Rank/grade: \_\_\_\_\_

E-mail address: \_\_\_\_\_ Telephone #: \_\_\_\_\_

Commander/leader name: \_\_\_\_\_ Rank/grade: \_\_\_\_\_

E-mail address: \_\_\_\_\_ Telephone #: \_\_\_\_\_

\_\_\_\_\_  
Commander/leader signature

# **Universal Waste Accumulation Management Sign**

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# Universal Waste Accumulation Management Sign

## UNIVERSAL WASTE

### Hazardous Wastes that JBER manages as “Universal Wastes”

- **Spent fluorescent lamps and tubes**
- **Spent batteries** (must be intact): Lithium, Magnesium, NiCad, and Mercury
- **Aerosol cans** that are empty, broken, and no longer needed
- **Mercury containing articles**: thermometers and mercury containing switches

According to **Chapter 40 of the Code of Federal Regulations, Parts 273.36 (40 C.F.R. 273.36)**, JBER must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relative to their responsibilities during normal facility operations and emergencies.

#### For all Universal Waste:

1. Put the item in your labeled waste container provided by the Hazardous Waste Center (HWC) if you have one; or
2. Bring it to the Universal Waste Collection Point behind the JBER HWC at 4314 Kenney Avenue between 13:00-15:00 Monday through Friday.
3. If you cannot bring it to the collection point today, place it in sealable container that is in good condition. See packaging and labeling instructions below.

#### Management of your Universal Waste Containers

1. Add Accumulation Start Date (ASD) to Label when first waste placed in container. ASD is the date accumulation begins (**40 C.F.R. 273.35**), used to demonstrate length of time that the Universal Waste has been accumulated from the date it becomes a waste. Universal waste must be removed from JBER before 1-year of accumulation.
2. Container must be in good condition and closed when not adding waste to it. Lids on tight, boxes taped, or zippers zipped up all of the way.
3. Turn in no later than 250 days (8.3 months), call the JBER HWC (552-3435) for container replacement.
4. Include management and spill response procedures as part of waste training to shop personnel. **40 C.F.R. 273.36.**
5. Have adequate and appropriate spill response equipment on hand, **40 C.F.R. 273.37.**

#### Spent Fluorescent Lamps and Tubes (40 C.F.R. 273.5)

- Accumulate in a way that prevents breakage.
- Label “Universal Waste – Lamps” and write the accumulation start date.
- **A spent fluorescent lamp tube or bulb that is not properly packaged and labeled is a hazardous waste violation.**
- The container can have no defects, must be taped shut, and be properly labeled.

Tape all ends completely shut



#### Spent Batteries (40 C.F.R. 273.2)

- Label each individual battery or container “Universal Waste – Batteries” and write the accumulation start date.
- **A spent battery that is not properly labeled is a hazardous waste violation.**
- All lithium, nickel cadmium and 9-volt batteries with exposed terminals must be protected from short circuit by covering terminals with tape or placing in individual plastic bags.



#### Aerosol Cans (40 C.F.R. 273.6)

- If the nozzle is broke, but you still plan to use the can again, write something like “Usable” or “Still good” on it.
- If empty, or you do not plan to use the can again because it is broke or for any other reason, the can must be managed as a Universal Waste.
- **A spent or unusable aerosol can that is not properly packaged and labeled is a hazardous waste violation.**
- Label “Universal Waste – Aerosol Cans” and write the accumulation start date.



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# Used Oil Management

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## Used Oil Management

The management of used oil is regulated under 40 CFR Part 279. Only the used oils outlined below will be accumulated within a used oil container or tank on JBER. Never place any HM, HW, or hazardous substance into a container marked for used oil as mixing may result in a violation of federal regulations. The following table summarizes the management requirements for used oil.

Waste Stream Definition	<p>Used oil includes:</p> <ul style="list-style-type: none"> <li>▪ Used engine/crankcase oil,</li> <li>▪ Used oil from used oil filters,</li> <li>▪ Used transmission fluid,</li> <li>▪ Used brake fluid,</li> <li>▪ Used power steering fluid, and</li> <li>▪ Used hydraulic fluid.</li> </ul> <p><i>Used oils above should not contain solvents, antifreeze (glycols), water, or fuel.</i></p> <p><i>Used oils that are free of other non-oil liquids/contaminants are considered "On- Spec."</i></p> <p>"Used oil" does not include oil from transformers or other electrical equipment. Check with the Hazardous Waste Center or Hazardous Waste Program Manager for appropriate management of "off-spec" used oil.</p>
Labelling Requirements	<p>All used oil containers must be marked with the words, "Used Oil." This applies, but is not limited to, drip pans, buckets, drums, tanks, fill pipes, and transfer pipes.</p>
Container Requirements	<p>Used oil containers must be in serviceable condition. Used oil containers will not have severe rusting, structural defects, or deterioration that may result in leaking. All used oil containers will be emptied or securely closed when not in-use. If a drum funnel is utilized, it must be removed from the drum whenever the container is not in-use except when the funnel can be securely closed in accordance with the EPA's guidance provided in RCRA Online Memo Number: 14826.</p>
Sampling Requirements	<p>Each used oil waste stream/process will be sampled and analyzed in accordance with the WAP. These waste samples are analyzed for: RCRA metals; total halogens; and flash point.</p>

## Used Oil Management

Storage Requirements	<p>Used oil storage areas will:</p> <ul style="list-style-type: none"> <li>▪ Have adequate secondary containment;</li> <li>▪ Be well-lit and away from high traffic areas;</li> <li>▪ Clear of obstructions and free of clutter;</li> <li>▪ Clearly identified on the emergency response floor plan; and</li> <li>▪ Include appropriate spill response materials in quantities that are adequate for the volume of used oil being accumulated.</li> </ul> <p>Used oil containers should be periodically inspected to ensure containers are marked, securely closed, and free of leaks or spills.</p>
Personnel Training Requirements	<p>Primary and Alternate Hazardous Waste Managers will manage the accumulation of used oil. The training requirements for Primary and Alternate Hazardous Waste Managers are outlined within Appendix H – Appointment of Primary and Alternate Hazardous Waste Managers.</p>
Transportation Requirements	<p>The Hazardous Waste Center will deliver appropriately marked used oil drums and remove them once full. Organizations will provide personnel and equipment (such as a forklift or crane) as required to load used oil containers onto the vehicle.</p>
Disposal Requirements	<p>“On-spec” used oil may be recycled.</p>

### Used Oil Filters

Used oil filters (non-terne plated type) should be drained and accumulated in an appropriately labeled and environmentally-safe container for disposal through the Hazardous Waste Center. Used oil filters are generally considered non-hazardous and should be labeled and managed as a non-hazardous waste. Some oil filters (terne-plated) may need to be managed as a hazardous waste. Contact the Hazardous Waste Center or the Hazardous Waste Program Manager for additional details regarding the proper management of used oil filters.

### Empty Oil Containers

Empty oil containers (i.e. quart containers, 5-quart containers, etc...) may be recycled or discarded as a non-hazardous solid waste once emptied. Empty 55-gallon oil drums may be used to accumulate used oil only after proper coordination with the Hazardous Waste Center or Hazardous Waste Program Manager. Some oil manufacturers will accept empty oil containers.

### Hazardous Waste Center Used Oil Sampling and Documentation Requirements

JBER will periodically obtain and analyze samples of used oil to confirm the used oil’s suitability for recycling. Additional characterization requirements may apply depending upon the specific recycling method, process, or company. Once used oil is documented per analysis not to

## Used Oil Management

exceed any specifications (see below table), the analysis or documentation used to make this determination must be kept on file for three years (40 CFR 279.72), and a record of the amount of on-spec used oil burned or shipped off-site must be maintained (40 CFR 279.74(b)). JBER maintains these records in EESOH-MIS.

### Used Oil Specifications (40 CFR § 279.11)

Constituent/Property	Allowable Level
Arsenic	5 ppm maximum
Cadmium	2 ppm maximum
Chromium	10 ppm maximum
Lead	100 ppm maximum
Flash Point	100 degrees Fahrenheit (F) minimum
Total Halogens	4,000 ppm maximum (see Note)

*Note:* Used oil containing more than 1,000 parts per million (ppm) total halogens is presumed to be a HW under the rebuttable presumption provided under 40 CFR § 266.40(c). This presumption may be rebutted by showing that the used oil does not contain chlorinated HW (40 CFR § 279.10(b)(1)(ii)). Otherwise, the used oil must be managed pursuant to the RCRA HW regulations. If the total halogen level in the used oil exceeds 4,000 ppm, it does not meet the specification limit for used oil.

In addition to the requirements of 40 CFR Part 279, accumulation of used oil is subject to all applicable requirements of the JBER Spill Prevention, Control and Countermeasures Plan/Oil Discharge Prevention and Contingency Plan. See Appendix M – Points of Contact for the Tanks and Petroleum, Oils, and Lubricants Program Manager.

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# **Oil/Water Separator User Knowledge Statement**

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## Oil/Water Separator User Knowledge Statement

Prior to removal of oil/water separator (OWS) waste from an organization, one of the organization's Hazardous Waste Managers must complete a copy of this form and affix a signed copy (with appropriate information) to each container containing OWS waste. Only trained Hazardous Waste Managers, appointed in accordance with the JBER Hazardous Waste Management Plan, are authorized to sign this form.

Container number: \_\_\_\_\_ Date: \_\_\_\_\_

Waste description: \_\_\_\_\_

EESOH-MIS waste stream number: \_\_\_\_\_

Organization: \_\_\_\_\_

By signing below, the signatory certifies: (1) he/she is a Hazardous Waste Manager appointed in accordance with the JBER Hazardous Waste Management Plan; and (2) the OWS waste does not contain hazardous material or hazardous waste. Indicate the type and quantity of hazardous material/hazardous waste that may be in the OWS waste.

Type: \_\_\_\_\_

Quantity: \_\_\_\_\_

Circle one: Primary Hazardous Waste Manager / Alternate Hazardous Waste Manager

Date of last hazardous waste training: \_\_\_\_\_

Date next hazardous waste training is due: \_\_\_\_\_

\_\_\_\_\_  
Name printed legibly / signature

If a Hazardous Waste Manager cannot determine if the OWS waste contains hazardous material or hazardous waste, he/she is required to manage it as unknown waste and contact the JBER Hazardous Waste Program Manager or the Hazardous Waste Center immediately.

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# **POL-Contaminated Soil User Knowledge Statement**

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## POL-Contaminated Soil User Knowledge Statement

Prior to disposal of POL - contaminated soil, one of the organization waste managers must complete a copy of this form and affix a signed copy (with appropriate information) to each container containing POL- contaminated soil. Only trained waste managers, appointed in accordance with the JBER hazardous waste management plan, are authorized to sign this form.

Date: \_\_\_\_\_

Waste description: \_\_\_\_\_

Container number: \_\_\_\_\_ Date soil placed in container: \_\_\_\_\_

Location of spill: \_\_\_\_\_

EESOH-MIS waste stream number: \_\_\_\_\_

Complete organization information: \_\_\_\_\_

Additional POC information: \_\_\_\_\_

By signing below, the signatory certifies (1) he/she is a waste manager appointed in accordance with the JBER hazardous waste management plan; (2) the POL-contaminated soil does not contain hazardous material or hazardous waste; (3) he/she is aware that containment of waste, not exactly as described on a container label, may be a violation of federal regulation.

Check the box to the left if you cannot certify that the POL-contaminated soil does not contain hazardous material or hazardous waste. Indicate the type and quantity of hazardous material/hazardous waste that may be in the OWS waste.

Type: \_\_\_\_\_ Quantity: \_\_\_\_\_

Circle one: Primary Waste Manager / Alternate Waste Manager

Date of last hazardous waste training: \_\_\_\_\_

Date next hazardous waste training is due: \_\_\_\_\_

Name printed legibly: \_\_\_\_\_ Signature: \_\_\_\_\_

If a waste manager cannot determine if the POL-contaminated soil contains hazardous material or hazardous waste, he/she is required to manage it as unknown waste and contact the JBER HW Program Manager or the central accumulation area immediately.

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# Points of Contact

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## Points of Contact

### JBER Fire and Emergency Services

**Dial 911**

### JBER Environmental Compliance

Environmental Program	Environmental Program Manager	Telephone Number(s)	E-mail Address
Hazardous Waste	M. Alex Cierlitsky	(907) 384-3322	matthew.cierlitsky@us.af.mil
Universal Waste	Rich Hackenberg	(907) 384-7854	richard.hackenberg@us.af.mil
Spill Response	Sam Fisher	(907) 384-3466	samantha.fisher.6@us.af.mil
Tanks / Petroleum, Oil, and Lubricants	Rosanna Dickens	(907) 384-2478	rosanna.dickens@us.af.mil
Solid Waste / Quality Recycling Program	Kim Pergola	(907) 384-3419	kimberly.pergola.1@us.af.mil
Water Quality	Jessica Weikert	(907) 384-6784	jessica.weikert@us.af.mil
Environmental Management System / Landfills / Toxics	Hannah Myers	(907) 384-2460	hannah.myers.2@us.af.mil
Air Quality	Amy Kearns	(907) 384-1361	amy.kearns.1@us.af.mil

## Points of Contact

### JBER Hazardous Waste Center

Telephone Number(s)	E-mail Address
(907) 552-3435 (907) 552-1742	673CES.CEIEC.HazardousWaste@us.af.mil

### Other JBER Offices of Interest

Office	Telephone Number(s)
JBER Fire and Emergency Services – Non-Emergency Line	(907) 552-2081
JBER Fire and Emergency Services – Fire Prevention	(907) 384-5555
673 Air Base Wing Occupational Safety	(907) 552-6850
U.S. Army Alaska Safety	(907) 384-2132
Bioenvironmental Engineering	(907) 384-3985
HAZMART Pharmacy Customer Service	(907) 552-2385
GSA ServMart	(907) 271-6501

## Points of Contact

### Defense Logistics Agency Disposition Services – Anchorage

Office	Telephone Number(s)	E-mail Address
Alaska Area Manager	(907) 201-6993	
Environmental	(907) 250-4787 (907) 250-4854	DLADispositionServicesatAlaskaEnvironmental@dla.mil
Disposal Service Representative	(907) 230-4169	drmsanchorageDSR@dla.mil

### Defense Logistics Agency Disposition Services – Fairbanks

Office	Telephone Number(s)	E-mail Address
Environmental	(907) 231-3197	DLADispositionServicesatAlaskaEnvironmental@dla.mil
Disposal Service Representative	(907) 231-7577	drmsfairbanksDSR@dla.mil

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# **Waste Container Certification Form**

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## Waste Container Certification Form

Prior to removal of waste from an organization, one of the organization waste managers must complete a copy of this form and affix a signed copy (with appropriate information) to each container. Only trained waste managers, appointed in accordance with the JBER hazardous waste management plan, are authorized to sign this form. Organizations will:

- Ensure containers are ready for pickup and suitable for transport to prevent a release of waste from the container.
- Close containers completely.
- Remove all funnels.
- Tighten drum bungs.
- Provide personnel and equipment (such as a forklift or crane) as required to load waste containers on the vehicle used to remove waste containers.

Central accumulation area personnel will not remove waste from an organization if a copy of this waste container certification form is not signed by an appointed waste manager and affixed to each container, if a container is not ready for pickup as described above, or if a container contains waste that is not exactly as described on the container label.

Container number: \_\_\_\_\_ Date: \_\_\_\_\_

Waste description: \_\_\_\_\_

EESOH-MIS waste stream number: \_\_\_\_\_

Organization: \_\_\_\_\_

By signing below, the signatory certifies (1) he/she is a waste manager appointed in accordance with the JBER hazardous waste management plan; (2) the container described above contains only waste exactly as described on the container label; (3) nothing in the waste generation process has changed since the waste profile was established; and (4) he/she is aware that containment of waste, not exactly as described on a container label, may be a violation of federal regulation.

Circle one: Primary Waste Manager / Alternate Waste Manager

Date of last hazardous waste training: \_\_\_\_\_

Date next hazardous waste training is due: \_\_\_\_\_

Name printed legibly: \_\_\_\_\_ Signature: \_\_\_\_\_

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# **Checklist for the First Person Observing a Spill**

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# Checklist for the First Person Observing a Spill

**Table 1-1  
Checklist for the First Person to Sight the Spill**

Response Actions	Yes	No	N/A	Time and Initials
Notify JBER FES (673 CES/CEF), FACC <i>Phone: 911</i>				
<b>Report the following:</b>				
Location				
Spill source (aircraft, tank, vehicle, etc.) and possible cause				
Present condition (leak continues, spill contained, etc.), extent of spill (estimated volume) and direction of spill movement (toward drains, sewers, etc., if applicable)				
Extent of personnel injuries				
<b>If evacuation is not necessary and responder can begin or manage spill cleanup:</b>				
Stop all sources of ignition and source of spill (if possible)				
Obtain spill cleanup materials and initiate spill cleanup or response until JBER FES or Environmental/LFM Spill Team arrives				
<b>If evacuation is necessary:</b>				
Activate signal horns/bells and begin evacuation of personnel to an upwind or upwind safe location (Refer to Figures 7 through 16 for evacuation routes and other pertinent response information)				
Establish initial safe zone				
Stop all sources of ignition and source of spill (if this can be done safely)				
Cease all vehicle traffic to the area and direct the movement of emergency equipment if required. Limit access to the area unless authorized by the IC.				

*NOTE: Adapted from 2021 Spill Prevention, Control, and Countermeasure Plan/Oil Discharge Prevention and Contingency Plan, by 673 CES/CEIEC, 2021*  
(<https://usaf.dps.mil/sites/jber/673ABW/XP/Current%20673%20ABW%20Plans/Forms/Default.aspx>)

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# **Acknowledgement of Understanding**

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## Universal Waste Acknowledgement of Understanding

I, \_\_\_\_\_, am the facility manager or non-delegated universal waste point of contact for building \_\_\_\_\_ on Joint Base Elmendorf-Richardson. By signing this form, I certify that I have received training in accordance with 40 CFR § 273.36 – Employee Training, regarding proper waste handling and emergency procedures for large quantity handlers of universal waste. As a facility manager or non-delegated universal waste point of contact I will ensure:

- Universal waste is only placed into an appropriately marked and labeled container;
- Universal waste container(s) is/are securely closed except when adding waste; and
- An adequate amount of appropriate spill response equipment is on-hand in the event of a release.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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# Used Oil Certification Statement

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## Used Oil Certification Statement

I, \_\_\_\_\_, certify that the used oil I am turning in to the Auto Hobby Shop is household do-it-yourselfer used oil. This used oil must be free of household hazardous wastes, polychlorinated biphenyls, and any other contaminants (i.e. water, antifreeze, solvents, fuels, etc...) that would prevent it from being managed as on-specification used oil. Used oil may include:

- Engine or crankcase oil;
- Transmission fluid;
- Brake fluid;
- Power steering fluid; and
- Hydraulic fluid.

\_\_\_\_\_  
Telephone number

\_\_\_\_\_  
Organization

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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# **JBER Hazardous Waste Manager Course**

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## JBER Hazardous Waste Manager Course

# Hazardous Waste Manager Course

## Joint Base Elmendorf-Richardson



The JBER Hazardous Waste Manager Course is an annual requirement for all military and civilian personnel who generate hazardous waste, hazardous waste pharmaceuticals, universal waste, or other regulated waste aboard JBER. While the training is designed to be a “Train-the-Trainer” type of course, all personnel aboard JBER are welcome. The course covers: roles and responsibilities; training requirements; recordkeeping; and waste procedures.

### **WHO needs hazardous waste training?**

- Primary and Alternate Hazardous Waste Managers
- Facility Managers
- Unit Environmental Coordinators
- Any individual whose work involves hazardous waste (to include hazardous waste pharmaceuticals), universal waste, or other regulated wastes and their immediate supervisor.

### **WHEN is training conducted?**

- Training is conducted twice per month and is typically 4-hours long.

### **WHERE is training conducted?**

Training takes place at:

- Elmendorf Education Center – 4109 Bullard Avenue, JBER
- Fort Richardson Education Center – 7 Chilkoot Avenue, JBER

### **WHY do I Need Hazardous Waste Training?**

The U.S. Environmental Protection Agency requires training for:

- Generators of hazardous waste – 40 CFR § 262.17(a)
- Handlers of universal waste – 40 CFR § 273.36
- Personnel managing non-creditable hazardous waste pharmaceuticals – 40 CFR § 266.502(b)

### **HOW do I Register for Training?**

For inquiries or course registration, please contact the JBER HW Center at:

- (907) 552-3435
- 673CES.CEIEC.HazardousWaste@us.af.mil

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# **JBER Spill Reporting Poster**

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## JBER Spill Reporting Poster



# SPILL REPORTING

**REPORT ALL SPILLS TO:**  
**JBER.Spill.Report@us.af.mil**

### WHEN REPORTING INCLUDE:

- Your name and contact information
- Time of spill or discovery
- Location of spill or discovery
- Type and quantity of substance spilled
- Actions taken (cleaned up, contained, evacuated area, etc.)
- Call 907-384-2478 with any questions

### Spills of Petroleum, Oil, or Lubricants (POLs) less than 10 gallons:

- First, if capable, contain and clean up the contaminated area; if in doubt call 911
- Second, submit a report to the Environmental Element (JBER.Spill.Report@us.af.mil)
- Call the Hazardous Waste Center at 552-3435 to obtain containers for wastes and disposal

### CALL 911 WHEN:

- GREATER than 10 gallons of POL is released to the environment
- Any amount of POL or hazardous waste/material is released to floor drains or sewage system
- ANY amount of hazardous waste/material is released
- ANY amount of POL or hazardous waste/material is released to waters of the U.S. (lakes, rivers, storm drains, etc.)
- The spill presents a fire, safety, or health risk
- The spill cannot be contained or spill response equipment is not available

**MAKE SURE YOU STATE "NON-EMERGENCY" IF ASSISTANCE ISN'T NEEDED TO CLEAN UP THE SPILL**

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