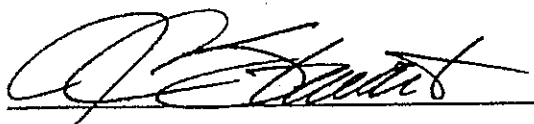


Hazardous Waste Management Plan
(2012 Update)

Marine Corps Air Station Iwakuni
Signature Page



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01 MARCH 2013

Date

Overview

This Hazardous Waste Management Plan is designed to encompass the requirements outlined in MCO P5090.2A and the Japan Environmental Governing Standards (JEGS) dtd August 2010. It provides the guidance necessary for the waste generators aboard MCAS Iwakuni, Japan to properly control and dispose of these wastes.

The current program relies on the Logistics' Hazardous Material Control Program (HCP) to control the issue of hazardous materials and the consolidation of the waste streams. The HCP provides for the individual site pick-ups of generated waste and then consolidates those wastes that are compatible throughout the air station. They produce the paperwork to turn the waste over to the DLA Disposition Services (formerly DRMO) and assist in the actual disposal contractor pick-up.

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Chapter 1: General Information

- 1.1 Situation. MCO P5090.2_ and the JEGS require that a program be in place to manage hazardous and non-regulated wastes generated aboard the installation. The MCO additionally requires that the installation develop and maintain a hazardous waste management plan to implement policies to prevent the improper disposal or release of these wastes to the environment. Implementation of this plan will ensure the requirements of the MCO P5090.2_ and the JEGS are met. No EPA/State identification numbers are required for generation, transportation, storage, treating, or disposing of HW.
- 1.2 Facility Description. MCAS Iwakuni is a growing air station whose primary mission is to provide facilities, materials and services to meet the support requirements of the 1st Marine Aircraft Wing. As a result of that mission, there are numerous units that generate waste. A complete list of those generators and their waste stream descriptions is detailed in the MCAS Iwakuni HW Analysis Plan.
- 1.3 Acronyms and Definitions.

1.3.1 Acronyms. Long titles cited in a general sense are in the lowercase form, but official titles are capitalized.

<u>Acronym</u>	<u>Long Title</u>
ASD	accumulation start date
CETEP	Comprehensive Environmental Training and Education Program
CO	Commanding Officer, MCAS Iwakuni
DoD	Department of Defense
DLADS	Defense Logistics Agency Disposition Service
EVR	Environmental Violation Report
GOJ	Government of Japan
HCP	Hazardous Material Control Program
HHW	household hazardous waste
HM	hazardous material
HMIS	hazardous material information system
HW	hazardous waste
HWAP	hazardous waste accumulation point
HWMP	hazardous waste management plan
HWPS	hazardous waste profile sheet

HWSA	hazardous waste storage area
JEGS	Japan Environmental Governing
Standards	
MCCS	Marine Corps Community Services
MSDS	material safety data sheet
NRW	Non-Regulated Waste
PCB	Polychlorinated Biphenyls
PMO	Provost Marshal's Office
POP	performance-oriented packaging
PPE	personal protective equipment
SCIW	specialy controlled industrial waste
SSSCP	site specific spill contingency plans
UCMJ	Uniform Code of Military Justice
USEPA	United States Environmental Protection Agency
USFJ	United States Forces Japan
USG	United States Government

1.3.2 Definitions

a. Environmental Branch. The Environmental Branch, Facilities Department, MCAS Iwakuni.


b. Generator. A generator is any unit, tenant command or any other individual, organization, or private contractor living on, working aboard, or visiting the air station producing any quantity of hazardous or non regulated waste which will require proper disposal.

c. Hazardous Material. Any material that is capable of posing an unreasonable risk to health, safety, or the environment if improperly handled, stored, issued, transported, labeled, or disposed because it displays a characteristic as detailed by attachment (4) guidelines. Munitions are excluded.

d. Hazardous Waste. A discarded material that may be solid, semi-solid, liquid, or contained gas as identified by attachment (4) guidelines.

e. Hazardous Waste Accumulation Point (HWAP). A HWAP is an area at or near the point of generation and under the control of the process generator where hazardous and non-regulated wastes are temporarily stored; up to 208 liters (55 gallons) of hazardous waste or 1 liter (quart) of acute hazardous waste from each waste stream.

f. Hazardous Waste Storage Area (HWSA). A HWSA is a location where quantities in excess of those allowed at HWAPs (208 liters (55 gallons) of HW or 1



liter (quart) of acute HW from any one waste stream) and NRWs are stored prior to shipment for treatment or disposal.

g. Manager. A person from a station or tenant command assigned the operational and administrative responsibility for receiving, storing, transferring and inspecting HW and/or NRW, and the general management of a HWAP or HWSA.

h. Non-Regulated Waste (NRW). A discarded material that does not meet the definition of a hazardous waste but requires special handling for disposal.

i. Waste. Any item that can no longer be used for its intended purpose or any other practical purpose and is considered to have no further value.

Chapter 2 Program Implementation

2.1 Contact Information

Key contacts for plan development and maintenance include:

Director, Environmental Branch
DSN: 253-6853 ✓

Hazardous Waste Program Manager, Environmental Branch
DSN: 253-6963 ✓

2.2 Responsibility for Program Implementation

The Commanding Officer has ultimate responsibility to ensure that the air station complies with all applicable regulations relating to waste management. The Facilities Officer is responsible for the development of the HWMP plan. This plan is intended to ensure that hazardous and non-regulated wastes generated aboard the installation are properly controlled and disposed of without harm to the environment. The Facilities Officer designates the Environmental Branch to develop and implement the required HWMP.

2.3 Subordinate Elements

2.3.1 Environmental Branch

2.3.1.1 Maintain liaison with all air station units, tenant commands, and contractor activities to ensure compliance with this plan.

2.3.1.2 Ensure that adequate funding to implement this plan has been requested through appropriate channels. (Note: Certain funding requirements remain with tenant units, i.e., waste equipment/supplies, drums, packaging, waste disposal costs, etc.).

2.3.1.3 Investigate all reported environmental violations aboard the Air Station.

2.3.1.4 Serve as a direct liaison with the Government of Japan (GOJ), the Marine Corps, and the United States Forces Japan (USFJ) for HW/NRW issues.

2.3.1.5 Ensure this plan is regularly reviewed and updated in order to remain current with all applicable regulations and work practices.

2.3.1.6 Establish and implement a waste sampling and analysis plan for all waste streams. Refer to the Station Waste Analysis Plan (Jan 2011 latest version) for the types, quantities and characteristics of Station generated waste streams.

2.3.1.7 Maintain oversight of the types and quantities of HW/NRW generated by each activity on board the air station. Evaluate suggested or potential methods for reducing the quantity or toxicity of the waste generated. These records are obtained from the HWSA and detailed in the HW Analysis Plan.

2.3.1.8 Compile/review data concerning hazardous material (HM), HW/NRW generation, accumulation, and management, disposal, and minimization efforts. Prepare summary reports of such data for the command as required. Refer to the station Pollution Prevention Plan for waste minimization/reduction opportunities.

2.3.1.9 Review all requests for new HW accumulation points (HWAPs) and HW storage areas (HWSAs) and issue operating authority for the approved requests. This authority should be reviewed as required to ensure requirements. A current list of authorized HWAPs and HWSAs is held and maintained electronically by the Environmental Compliance Inspector.

2.3.1.10 Establish and coordinate a network of unit HW/NRW managers and assistants. Maintain a current list of all unit HWAP/HWSA managers, phone numbers, and specific operating locations. This list is managed and kept electronically by the Environmental Branch Compliance Inspector.

2.3.1.11 Maintain list of personnel authorized to sign waste manifests (located in HW Manager's turnover folder). It is recommended that the HW Program Manager, HWSA Manager and the Assistant HWSA Manager maintain this authority.

2.3.1.12 Perform formal inspections, at least annually, of all active HWAPs and HWSAs aboard MCAS Iwakuni. These inspections will primarily address compliance with the provisions of this plan. Enclosure (3) is the checklist of items to be covered during these inspections.

2.3.1.13 Perform site assistance visits/inspections of all activities, tenant commands, and contractors generating HW/NRW on a minimum of a biweekly basis. Should manpower issues deem this to become too cumbersome this requirement may be extended to a bimonthly requirement. Enclosure (4) will be used as the basic checklist for these visits. Pursue corrective actions for violations as indicated below.

(1) If the violation does not receive immediate attention, issue an "Environmental Oversight Compliance Inspection" ticket to the site manager or his representative. The ticket should include information to notifying them of the violation(s) and recommended corrective action(s).

(2) Lack of timely corrective action will result in an additional ticket being issued and if warranted an e-mail routed through the station Facilities Officer and/or the Environmental Director as appropriate to the unit commanding officer describing the situation and requesting assistance in rectifying the violation(s).

(3) In the event that appropriate corrective action is still not accomplished in a timely manner, an Environmental Violation Report (EVR) will be issued to the unit's commanding officer via the CO, MCAS Iwakuni describing the violation and the recommended corrective action.

2.3.1.14 Conduct HW training for activities and tenant commands as required. The CETEP coordinator provides guidance on training requirements and supplementary training plans.

2.3.1.15 Ensure station Spill Prevention and Response Plan includes measures for HW Contingency Plan.

2.3.1.16 Maintain a Closure Plan for any active HWSA(s). Plan is located at the HWSA (Conforming Storage) and in the Environmental Branch library.

2.3.2 Facilities Utilities Division.

2.3.2.1 Sample (as required), label, and otherwise manage all electrical equipment containing polychlorinated biphenyls (PCBs) in accordance with the current JEGS requirements. This includes providing the Fire Department with an updated inventory of all PCB containing equipment on the air station. New equipment shall be tested for PCB content unless accompanied by an equipment specific PCB analysis and/or certificate.

2.3.3 Fire Department.

2.3.3.1 Provide guidance for HW/NRW accumulation/ storage areas to ensure that they comply with applicable fire prevention regulations.

2.3.4 Resident Officer in Charge of Construction/Facilities Support Contracts /U.S. Army Corps of Engineers .

2.3.4.1 Require contractors operating on behalf of the United States Government to comply with the requirements of this plan.

2.3.4.2 Ensure that all HW/NRW generated by government contractors is disposed of in accordance with this plan. The disposal cost for these items shall be borne by the contractor.

2.3.4.3 Maintain copies of all environmental documents submitted documenting proof of disposal authority and proof of disposal.

2.3.4.4 Promptly notify the Environmental Director of any violations or suspected violations of this plan and enforce corrective actions as directed.

2.3.5 Family Housing.

2.3.5.1 Restrict family housing occupants from performing maintenance in driveways, carports, and other common areas which results in the removal of automotive oils or fluids from privately owned vehicles.

2.3.5.2 Advise residents that potentially hazardous automobile wastes such as batteries, battery acids, oils, or other fluids, must be turned-in to the Marine Corps Community Services (MCCS) Auto Hobby Shop or service station for proper disposal.

2.3.5.3 Ensure the proper management and disposal of HW/NRW issued through the Family Housing self-help program.

2.3.5.4 Coordinate with the Environmental Branch for the collection and proper disposal of all hazardous household products such as, but not limited to, gasoline, paints, paint strippers, thinners, solvents, lighter fluids, pesticides, drain cleaners, oven cleaners, chlorine bleach, ammonia, acids, bases, assorted batteries, etc., generated by personnel living in or vacating any family housing unit.

2.3.6 Logistics.

2.3.6.1 Maintain adequate supplies of performance oriented packaging (POP) approved containers and labels for use by generators aboard the air station.

2.3.6.2 Require contractors operating under the control of the Logistics Department to comply with the requirements of this plan and promote green procurement initiatives.

2.3.6.3 Ensure HW/NRW generated by government contractors under control of the Logistics Department are disposed of in accordance with this plan. The disposal cost shall be borne by the contractor.

2.3.6.4 Promptly notify the Environmental Branch of any violations or suspected violations of this plan and enforce corrective actions as directed.

2.3.6.5 Operate a Hazardous Material Consolidation Program (HCP) to achieve life-cycle control and management of HM through final waste disposal. The application of sound management practices that minimize the types and quantities of HM procured, stored, distributed, used and disposed is essential to the management of this program.

2.3.6.6 Track usage data by unit for all HM and HW/NRW processed. Provide breakdown to Environmental Branch for reporting requirements and program tracking as requested.

2.3.6.7 Maintain inventories for all HM and HW managed through the HCP program and provide requested inventory in the event of a natural disaster.

2.3.6.8 Provide waste pick-up services for generators who request waste pick-ups through appropriate channels.

2.3.6.9 Ensure Conforming Storage personnel maintain a shipper's certification, per DoD 4500.9 (para 204 section D), authorized by the station CO for HW shipments. It is recommended that at least the Manager and Assistant Manager maintain this authority.

2.3.7 Branch Medical Clinic

2.3.7.1 Ensure medical waste is controlled and managed IAW this plan and the JEGS chapter 8.

2.3.8 Marine Corps Community Services (MCCS)

2.3.8.1 Provide and maintain an HWAP for patrons of the Auto Hobby Shop who perform engine fluid changes, battery maintenance, and other significant maintenance on privately owned vehicles.

2.3.8.2 Require contractors under MCCS control to comply with the requirements of this plan. The cost for waste disposal shall be borne by the contractor.

2.3.8.3 Promptly notify the Environmental Director of any violations or suspected violations of this plan and enforce corrective actions as directed.

2.3.9 Generators. Any activity or tenant command generating HW/ NRW.

2.3.9.1 Station organizations and U.S. tenant commands generating HW/NRW will designate, in writing, a HW/NRW manager and assistant manager(s) as the primary point of contact for HW/NRW issues within their respective unit. The primary manager shall be an E-6 or above or civilian equivalent. A copy of each appointment letter shall be forwarded to the Environmental Branch.

2.3.9.2 Ensure personnel attend required training and do not work without trained supervision until training is accomplished. HW training is required for all personnel whose duties involve actual or potential exposure to HW, including persons performing any of the following tasks:

- (1) determining which waste(s) are HW;
- (2) completing HW record keeping requirements (e.g., turn-in/transfer documents, HW logs, profile sheets, etc.);
- (3) handling and storage of HW containers;
- (4) transferring HW to or from accumulation tanks or containers;
- (5) transporting HW;
- (6) performing HW cleanup;
- (7) inspecting, managing, or working at a HWAP or HWSA;
- (8) collecting HW samples; or
- (9) conducting other HW related activities as designated by the Environmental Branch.

2.3.9.3 Forward all requests for establishing, relocating or deactivating a HWAP/HWSA to the Environmental Branch for authorization and guidance prior to the action.

2.3.9.4 Provide sufficient personnel, equipment, and supplies to properly and safely operate their HWAP(s)/HWSA in compliance with this plan.

2.3.9.5 Budget sufficient funds to manage the HW/NRW program.

2.3.9.6 Ensure that the Environmental Branch is notified of squadron/unit rotation dates to ensure that joint inspections are conducted within one week of

arrival. An inspection shall also be conducted within one week prior to departure of the squadron/unit in conjunction with the turnover of the HWAP(s). The joint inspection will be with the HW/NRW manager and the Environmental Branch compliance inspectors. Prior to the squadron/unit departure, the HW/NRW manager will ensure all wastes have been turned in and that the HWAP(s) is/are empty of all wastes.

2.3.9.7 Identify and characterize the wastes generated at their operation using their knowledge of the wastes and the processes that generated the wastes to determine whether they are a HW or NRW. Enclosure (5) provides guidance for the identification of waste. All wastes requiring laboratory analysis will be coordinated through the Environmental Branch. The cost for analyzing improperly handled or non-segregated waste will be borne by the generator. Coordinate with Environmental Branch and the HCP for assistance in proper waste determinations.

2.3.10 Hazardous Waste Managers

2.3.10.1 HW managers shall be responsible for managing all waste generation, minimization, accumulation, and disposal in accordance with this plan.

2.3.10.2 The manager will keep their chain of command informed of HW management policies and problems, and will initiate the enforcement of policies as outlined in the unit/ department HWMP and this plan.

2.3.10.3 The manager is responsible for all of the inspection/ administration/management requirements of the HWAP or HWSA as detailed by enclosure (4), (6), and (7) and will ensure the following:

(1) A complete and accurate operating file, as described in enclosure (8), and an audit trail of HW/NRW are maintained from point of generation to turn-in for final disposal.

(2) All equipment/materials required to properly manage/operate the HW/NRW program are properly identified, budgeted for and procured in a timely manner.

(3) HWAP(s) or HWSA are readily accessible for inspection by the Environmental Branch or other environmental inspectors/audit representatives, as determined by Marine Corps regulations or CO's direction. The manager will be present at the scheduled inspection(s).

2.3.10.4 Good housekeeping practices will be maintained at the HWAP(s) or HWSA.

2.3.10.5 All managers will remain current in environmental training requirements and are required to attend all meetings, workshops, and other activities as directed by the Environmental Branch.

2.3.10.6 The manager will coordinate HM/HW handler's/spill response/management course training and other appropriate training through the unit training officer and the Environmental Branch's CETEP coordinator.

2.3.10.7 The manager will assign site-specific managers to each HWAP/HWSA that is not under the manager's direct operational control. This assignment will be in writing and those site specific managers' names will be forwarded to the Environmental Branch Compliance Inspector (email is acceptable). They will be assigned the operational responsibility for all requirements of this plan. In the event of a unit deployment or other activity that will require those personnel assigned to be out of the area, the manager will notify Environmental Branch who will be assigned the responsibilities in their absence.

2.3.10.8 The manager will ensure all required spill response equipment and supplies are on-hand in accordance with reference (e).

2.3.11 Defense Logistics Agency Disposition Services (DLADS) (formerly DRMO)

2.3.11.1 Accept and properly dispose of HW/ NRW generated on the air station by U.S. forces.

2.3.11.2 Provide the Environmental Branch legible copies of all processed delivery orders and turn-in documents as requested.

2.3.11.3 Inspect disposal contractors for proper permitting to ensure that waste generated aboard the air station is properly transported and disposed of IAW JEGS and Japanese Laws.

2.3.11.4 Maintain the original manifests and subsequent copies of proof of disposal (maintained for 5 yrs). Copies should be provided to the HCP Conforming Storage and Environmental Branch as requested.

CHAPTER 3

Special Waste Stream Management

There are several waste streams that are managed outside the normal waste channels. The following are some of those streams and the principles that ensure proper management.

3.1 Universal Wastes are not identified as such by any of the requirement documents that guide the waste practices and therefore not controlled as such. There are overlapping programs that are detailed in the following paragraphs.

3.2 Used/off spec petroleum, oils and lubricants. Currently these items are collected at the unit level and then sold through a DLA Disposition Services contract for energy recovery. Gasoline/mogas is not permitted to be added to the used oil/fuel tanks due to the lowering of the flash point. Request for gasoline/mogas disposal should be directed to the Environmental Branch Compliance Inspector at 253-5038/3088. ESOP-UOF-01 details the controls and procedures.

3.3 Lead-acid batteries are collected at the unit level, consolidated and sold to a recycler through the station's QRP. ESOP-LAB-01 details the controls and procedures for this program.

3.4 Fluorescent lamps are collected at the Facilities Maintenance Bldg. #155 and then disposed of by the station's solid waste contractor at the Iwakuni Recycle Plaza. Units are instructed to contact the trouble Desk at 253-3131 for drop off/collection area guidance.

3.5 Asbestos is treated as a NRW and is controlled as such IAW this plan.

3.6 Absorbents contaminated with POLs are treated as a NRW and are controlled as such IAW this plan. The units are encouraged to participate in the Shop Rag Reuse Program which is a P2 initiative to minimize this waste stream.

3.7 Empty HM/HW containers are processed through the HCP Consolidating Storage location and are crushed and then processed into the QRP scrap metal sales program. Some individual shops that possess the capability of crushing their own containers may do so and turn-in to the QRP.

3.8 Rechargeable- recyclable batteries are collected at the Recycle Center Bldg. 725 and processed to the Japan Portable Rechargeable Battery Recycling Center (JBRC) at no cost to the Station. Batteries that qualify include lithium-ion (Li-on), nickel cadmium (Ni-Cd) and nickel metal hydride (Ni-MH). Batteries must contain

the recycling logo embossed on the case. ESOP-RRB-01 provides additional guidance on the program.

3.9 Used antifreeze is handled as a HW due to past heavy metal contamination. Once turn-in has been accomplished through the HCP Conforming Storage (HWSA) a licensed contractor recycles the required amount (per purchase request) for reuse through the HCP HazMinCtr. Overly contaminated antifreeze is processed as HW. Ensure unit antifreeze collection pans are properly segregated and marked for "Antifreeze only" to minimize cross-contamination with POL products.

3.10 Household Hazmat (HHM) is an issue aboard the station since the housing is within the base fence line. Residents are encouraged to drop off any unused serviceable HM at the HCP HazMinCtr bldg. 1645. The HazMinCtr maintains a household re-use locker that makes the usable HM available for anyone's use. HHM that is disposed of in household trash is segregated by the station's solid waste contractor. The contractor separates those items that can be processed within the Japanese system and those stateside products that fall outside their knowledge. The items that fall outside their capabilities are taken to the Recycle Center for additional screening. Those items that present minimal hazards (air fresheners, deodorants, etc.) are crushed and the metal is processed along with the other scrap metals collected. The items that are deemed hazardous in nature (paints, lubricants, etc.) are then taken to the HCP HWSA for processing as HW/NRW as appropriate.

3.11 Military munitions are controlled and handled by the station's Ordnance Division and Explosive Ordnance Division and their procedures cover all aspects of the program. The air station does not handle or store HW munitions.

CHAPTER 4 TRAINING

4.1 Application. Personnel and their supervisors who are assigned duties involving actual or potential exposure to HW must successfully complete an appropriate training program prior to assuming those duties. Personnel assigned to such duty must work under direct supervision until they have completed appropriate training. Additional guidance is contained in DoDI 6050.05, "DoD Hazard Communication (HAZCOM) Program".

4.2 Refresher Training. All personnel performing HW duties must successfully complete annual refresher HW training.

4.3 Training Contents and Requirements. Environmental Branch's CETEP Coordinator is responsible to ensure the training meets or exceeds these requirements. The training program must:

4.3.1 Include sufficient information to enable personnel to perform their assigned duties and fully comply with pertinent HW requirements.

4.3.2 Be conducted by qualified trainers who have completed an instructor training program in the subject, have comparable academic credentials, or experience.

4.3.3 Be designed to ensure that facility personnel are able to respond effectively to emergencies by familiarizing them with emergency procedures, emergency equipment, and emergency systems.

4.3.4 Address the following areas, in particular for personnel whose duties include HW handling and management:

(a) Emergency procedures (response to fire/explosion/spills; use of communications/alarm systems; body and equipment clean up).

(b) Drum/container handling/storage; safe use of HW equipment; proper sampling procedures.

(c) Employee protection, to include Personal Protective Equipment (PPE), safety and health hazards, hazard communication, worker exposure.

(d) Recordkeeping, security, inspections, contingency plans, storage requirements, and transportation requirements.

4.3.5 Documentation of Training. Installations must document all HW training for each individual assigned duties involving actual or potential exposure to HW. Training records are maintained by the Environmental Branch for all classes offered by that office. Individual units are provided a copy of all certifications of that training and must maintain those records for at least three years after termination of duty of those personnel.



MANAGEMENT OF HAZARDOUS WASTE ACCUMULATION POINTS

1. HWAP Site Requirements

a. A HWAP is a specific area at or near the point of generation and under the control of the process generator where HW/NRW is temporarily stored, up to 208 liters (55 gallons) of HW or 1 liter (quart) of acute HW from each waste stream.

b. Accumulate and/or store HW/NRW only in those HWAPs approved by the Environmental Division.

c. A HWAP may be a shop, site, or other work center dealing with one or more waste streams. Each HWAP must be designed and operated to provide appropriate segregation for chemically incompatible waste streams.

d. Each HWAP will have the following bilingual signs posted at the designated area. Contact the Environmental Division for more specific guidance.

(1) HWAP designation sign (site number, point of contact and extension, emergency response phone number) (main entrance of stand alone structures, point of accumulation for other points).

(2) Danger. Unauthorized personnel keep out (all approachable sides) (stand alone structure only).

(3) No smoking (all approachable sides) (only required if accumulating ignitables or reactives).

(4) Warning signs (i.e., flammable, corrosive, etc.) appropriate for each waste stream being accumulated (point of accumulation). The actual DOT hazard label affixed to the individual containers is adequate for this requirement.

e. All HWAPs must have a containment system that has sufficient capacity to contain 10% of the volume of all stored containers or 100% of the volume of the largest container, whichever is greater. Containers that do not contain free liquids need not be considered in this determination.

f. The containment system must be sufficiently impervious to contain leaks, spills and accumulated precipitation until the collected material is detected and removed.

2. Administration

a. Ensure the Environmental Division has authorized the collection and accumulation of waste at the specific HWAP. Requests for establishment of new sites must include at a minimum the following information:

(1) Location of site.

(2) Waste(s) to be accumulated at the site and potential hazards of each.

(3) Proposed collection container size and estimated rate of generation.

(4) Proposed site Manager(s) name(s).

b. Keep all "Hazardous/Non-Hazardous Waste Turn-in/Pick-up Documents" in order to maintain the waste tracking flow from generation to consolidation and disposal. (Keep for 5 years)

c. Keep copies of weekly inspection reports as outlined in attachment (5). (Keep for 5 years)

d. Maintain and post a current copy of the site specific spill contingency plan to manage spills. See paragraph 5 of this attachment.

3. HW Handling and Management. The accumulation of ignitable, corrosive, reactive, toxic, or incompatible wastes must be handled so they do not threaten human health or the environment. The HWAP manager must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. The wastes must be separated and protected from sources of ignition or reaction, including but not limited to: open flames, smoking, cutting, welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), and spontaneous ignition (e.g., from heat-producing chemical reactions, and radiant heat). While ignitable, corrosive, reactive, or toxic wastes are stored or handled, the HWAP personnel must confine smoking and open flame to specially designated locations. Water reactive waste cannot be stored in the same area as flammable and combustible liquid, or where it may react with rain.

a. Containers used to accumulate waste will be in good condition, free from severe rusting and bulging or structural defects and meet the applicable transportation regulatory packaging requirements (i.e., POP). These containers are either provided by the HCP, HWSA or Facilities Environmental.

b. Containers used to accumulate waste, including over pack containers, must be compatible with the waste material.

c. Containers used to accumulate waste must always be closed during storage except when adding or removing waste.

d. Containers holding waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

e. Containers accumulating HW will be marked with a bilingual (English and Japanese) "Hazardous Waste" marking, the nomenclature of waste and a label indicating the hazard class of the waste contained (i.e., ignitable, corrosive, reactive, toxic, etc.). Markings will also include the HWAP# in the top left corner and the profile # (e.g.: H001, H012, etc.) associated with the waste stream in the upper right hand corner of the marking.

f. Containers used to accumulate NRW will be marked with a bilingual (English and Japanese) "Non-Regulated Waste" marking, the nomenclature of waste and will have a label indicating the hazard class of the waste if applicable. Markings will also include the HWAP# in the top left corner and the profile # (e.g.: N001, N035, etc.) associated with the waste stream in the upper right hand corner of the marking.

g. Containers accumulating liquids will have sufficient headspace (outage) to allow for liquid expansion.

h. Areas that store containers holding ignitable or reactive waste must be located at least 16 meters (50 feet) inside the installation's boundary.

i. Incompatible wastes and materials must not be placed in the same container.

j. Waste must not be placed in any unwashed container that previously held an incompatible waste or material.

k. A storage container holding a HW that is incompatible with any waste or other material stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or barrier.

l. Segregate extra empty containers from active accumulation containers and ensure they are designated as empty through the use of signs or drum markings. For containers on the HWAP, simply flipping over the smaller pails is sufficient.

m. Do not permit container deterioration due to standing water. Remove rainfall from container tops and elevate or protect containers from contact with accumulated liquids.

n. Ensure good housekeeping practices are enforced and HWAPs are utilized for waste accumulation only. Hazardous "materials" should not be stored or located within the footprint of the HWAP.

4. Waste Turn-in

a. Prior to the waste stream reaching the accumulation limits or the accumulation containers are full, a request for pick-up will be initiated to the Conforming Storage Area (HWSA), Bldg. 1031 in accordance with their local guidelines (currently an email requesting a "HW PICK-UP"). Current guidelines for waste pick-up may be obtained by contacting the Environmental Branch or the HWSA directly. No individual HWAP will deliver waste to the HWSA without prior permission from Facilities Environmental or the Conforming Storage Manager. Multiple containers of NRW may be accumulated only if operational requirements make such accumulation more practical.

b. All waste turn-ins will be picked up and processed by HWSA #1031 (Conforming Storage) personnel.

c. Each waste pick-up/turn-in will be documented with a "Hazardous/Non-Hazardous Waste Turn-in/Pick-up Document" and that receipt document will be maintained with the HWAP's Operating File.

5. Spill Contingency

a. Each HWAP will have a site specific spill contingency plan (SSSCP), in accordance with the Station's Spill Prevention and Response Plan, to manage spills and releases of any waste. Contact the Environmental Branch for assistance in preparing the plan.

b. A copy of the contingency plan will be posted in a prominent location.

c. Use and handle HM to reduce the risk of spills, releases to the environment, and the unnecessary generation of HW/ NRW.

d. Maintain all valves on containment structures in the closed and locked position except to drain rainwater. Inspect the quality of water prior to draining. If spill residue appears on or in the water take appropriate steps to collect the spill residue prior to draining. All excess water should be drained prior to operations in the area to minimize the waste volume potential in the event of a spill or release.

e. Ensure adequate spill response materials are maintained on hand at all areas where HM, HW, and NRW may be spilled. Equipment must be staged in such a manner that it is accessible to the scene of a spill immediately.

f. Secure all waste containers at the onset of Typhoon Condition III. Turn in all wastes that can be readily turned in to the HWSA.

6. Training

a. Managers, assistant managers, and/or handlers must successfully complete an appropriate training program prior to assuming those duties without trained supervision. In the event that required training cannot be accomplished prior to assuming management duties, personnel will ensure that they attend the next available class.

b. No matter what prior training the individual has had in the past, they must attend the local training provided by the Facilities Environmental Branch to ensure they are familiar with local regulations.

b. All personnel performing duties as prescribed in this enclosure must successfully complete hazardous waste annual refresher training.

c. Coordinate HW management training with the Facilities Environmental Branch's CETEP Coordinator through the unit/activity training officer/S-3.

MANAGEMENT OF HAZARDOUS WASTE STORAGE AREAS

1. Hazardous Waste Storage Area Requirements

a. A HWSA is a location where quantities in excess of those allowed at HWAPs (208 liters (55 gallons) of HW, or 1 liter (1 quart) of acute HW from any one waste stream) and NRW are stored prior to shipment for treatment or disposal.

b. HWSA should be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned release of hazardous waste or hazardous constituents to air, soil, or surface water that could threaten human health or the environment.

c. An acceptable security system must be utilized which prevents the unknowing and unauthorized entry of persons or livestock into the storage area (e.g., a fence and/or a wall) and that completely surrounds the HWSA, combined with a means to control access at all times by the attendant (e.g. locked gate).

d. Each HWSA will have the following bilingual signs posted at the designated area. Contact the Environmental Division for more specific guidance.

(1) HWSA designation sign (site number, point of contact and extension, emergency response phone number) (main entrance).

(2) Danger. Unauthorized personnel keep out (all approachable sides).

(3) No smoking (all approachable sides).

(4) Warning signs (i.e., flammable, corrosive, etc.) appropriate for wastes being stored (post at the appropriate segregated storage area).

e. Sufficient aisle space must be provided to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in an emergency. Containers must not obstruct an exit.

f. Whenever hazardous waste is being poured, mixed, or otherwise handled, all personnel involved in the operation must have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another person.

g. If there is only one person on duty at the HWSA premises, that person must have immediate access to an intrinsically safe device, such as a telephone

(immediately available at the scene of operations) or a hand-held two-way radio, capable of summoning emergency assistance from PMO, Structural Fire Division, or other emergency response teams.

h. HWSA's must have portable fire extinguishers and/or fire control equipment appropriate to the material/waste being accumulated and stored, spill control equipment and decontamination equipment.

i. HWSA's must have water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray systems at the HWSA.

j. HWSA's must have personal protective equipment (PPE) on hand appropriate to the materials stored and eyewash and shower facility must be readily available.

k. Periodic maintenance and testing of all equipment used for HWSA operations should be done to ensure proper operation.

l. HWSA's must have a containment system that is sufficiently impervious to contain leaks, spills and accumulated precipitation until the collected material is detected and removed.

m. HWSA's must have a containment system with sufficient capacity to contain 10% of the volume of stored containers or the volume of the largest container, whichever is greater.

n. Storage areas that store containers holding only wastes that do not contain free liquids need not have a containment system as described in paragraphs 1l (one-el) and 1m above provided the storage area is sloped or otherwise designed and operated to drain and remove liquid resulting from precipitation, or the containers are elevated or are otherwise protected from contact with accumulated liquid.

o. Areas where containers are stored must be inspected weekly for leaking containers, deterioration of containers, and containment system damage caused by corrosion or other factors.

2. Administration

a. Maintain current operating authority in the operating file. This authority is issued by the Environmental Branch and authorizes the use of the site. No HWSA may be constructed or operated without prior approval and guidance from the

Environmental Branch. These sites will be reviewed annually for compliance requirements to ensure proper usage.

b. Maintain current copies of all required references.

c. Maintain current and previous assignment letters of managers, assistant managers and/or handlers. Letters will be kept in the operating file for three years after termination or transfer of those assigned.

d. Maintain training records or copies of training records on personnel assigned as managers, assistant managers, and handlers in the operating file for three years after termination or transfer of those personnel assigned in paragraph 2c above.

e. Maintain a current log of all HW/NRW handled. This log will be available/accessible to emergency personnel in the event of a fire and/or spill. This log will be maintained until closure of the installation. The waste log will be updated during all waste turn-in operations for annotation of disposition (i.e., DLADS turn-in date/document number, contractor pick-up date/manifest number). The log will contain (at the minimum) the following data.

1. Name of generator
2. Description and hazard class of the waste
3. Number and type of containers
4. Quantity of waste
5. Date stored
6. Storage location
7. Disposition data (pick-up date and delivery order number is sufficient to track any other pertinent information)

f. Maintain copies of weekly inspection reports and corrective actions taken as outlined in attachment 5. These weekly inspections will be retained for a period of five years.

g. Maintain copies of all turn-in documents/manifests for waste turned-in for disposal. These copies will be retained for a period of five years.

h. Maintain copies of all waste analyses, characterization records, or profile sheets for waste turned-in for disposal. Upon closure of the HWSA these records will be turned over to the Environmental Branch and retained for a period of five years after closure of the installation.

i. Maintain a current copy of a site specific spill contingency plan to manage spills.

j. Develop and maintain a closure plan that includes an estimate of the storage capacity of the facility, steps to be taken to detect, remove and/or decontaminate all waste residues, and an estimate of the expected date for closure. A copy of this closure plan is additionally kept at Environmental Branch.

3. Site Management

a. The HWSA manager will ensure proper and accurate identification of incoming waste prior to acceptance.

(1) Inspect the waste to ensure it matches the turn-in documentation.

(2) Ensure all waste containers are properly marked and labeled in accordance with this Order.

(3) Request MSDS(s) and process information from generators if there is reason to believe that the process generating the waste stream has changed or that an improper characterization was done.

(4) Ensure waste(s) are analyzed in accordance with the waste analysis plan to ensure it matches the waste characterization on the accompanying documents.

(5) Refuse to accept wastes that do not match the turn-in documentation.

(6) Ensure containers meet POP requirements and are in adequate condition to maintain integrity.

b. Ensure that controlling access to the HWSA prevents the unauthorized use of any waste container.

c. Do not permit container deterioration due to standing water. Remove rainwater from container tops and/or elevate/ protect containers from contact with accumulated liquids.

d. All communication and alarm systems, fire protection equipment, spill control equipment, and decontamination equipment must be periodically tested and maintained to assure its proper operation in time of an emergency.

4. Waste Storage. The storage of ignitable, reactive, or incompatible waste must be handled so that it does not threaten human health or the environment. The HWSA manager must take precautions to prevent accidental ignition or reaction of ignitable or reactive waste. This waste must be separated and protected from sources of ignition or reaction, including but not limited to, open flames, smoking,

cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), and spontaneous ignition (e.g., from heat-producing chemical reactions, and radiant heat). While ignitable or reactive waste is being stored or handled, the HWSA personnel must confine smoking and open flame too specially designated locations. Water reactive waste cannot be stored in the same area as flammable and combustible liquids or where it may be exposed to and react with rain or fire sprinkler systems.

a. Containers holding waste will be in good condition, free from severe rusting, and bulging or structural defects and meet the applicable transportation regulatory packaging requirements (i.e., POP).

b. Containers used to store waste, including overpack containers, must be compatible with the materials stored.

c. Containers accumulating waste must always be closed during storage, except when it is necessary to add or remove waste.

d. Containers holding waste must not be opened, handled, or stored in a manner that may rupture the container or cause it to leak.

e. Containers accumulating and consolidating HW will be marked with a bilingual (English and Japanese) "Hazardous Waste" marking, the nomenclature of waste and will have a label indicating the hazard class of the waste contained (i.e., ignitable, corrosive, reactive, toxic, etc.). Containers will also be marked with an accumulation start date (ASD) once the container is full (all containers will have adequate headspace to allow for expansion) or when no additional waste will be added to that container. The ASD will be in a Julian date format.

f. Containers used to accumulate NRW will be marked with a bilingual (English and Japanese) "Non-Regulated Waste" marking, the nomenclature of waste and will have a label indicating the hazard class of the waste if applicable.

g. Containers accumulating liquids will have sufficient headspace (outage) to allow for liquid expansion.

h. Areas that store containers holding ignitable or reactive waste must be located at least 16 meters (50 feet) inside the installation's boundary.

i. Incompatible wastes and materials must not be placed in the same container.

j. Waste must not be placed in any unwashed container that previously held an incompatible waste or material.

k. A storage container holding a HW that is incompatible with any waste or other material stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or barrier.

l. Segregate empty containers from active accumulation containers and ensure they are designated as empty through the use of signs or drum markings.

m. Do not permit container deterioration due to standing water. Remove rainfall from container tops and/or elevate or protect containers from contact with accumulated liquids.

5. Waste Turn-in

a. HW will be processed for disposal through DLA Disposition Services upon closure of the container. Full or closed NRW containers will be processed for disposal through DLA Disposition Services upon determination of container closure. Multiple containers of NRW may be accumulated only if operational requirements make such accumulation more practical.

b. For DLA Disposition Services disposal processing ensure the documentation and markings, as required by reference (d), are completed prior to all pre-inspections. Notification is made when any container is ready for DLA Disposition Services inspection. This notification will include the type and quantity of HW to be inspected, location, point of contact, and telephone number. All HW containers will be processed for disposal through DLA Disposition Services when full/closed.

c. Ensure a MCAS CO authorized signature is on all manifests for wastes leaving the Air Station. Personnel authorized to sign manifests will be trained iaw DoD 4500.9_ (chapter 204).

c. The waste logbook will be annotated with the appropriate entries during the turn-in process.

6. Spill Contingency

a. Each HWSA will have a site specific spill contingency plan (SSSCP), in accordance with reference (e), to manage spills and releases of any waste. Contact the Environmental Branch for assistance in preparing this plan.

b. A copy of the contingency plan will be posted in prominent locations and will be submitted to PMO, Structural Fire Division, and BMCI.

c. Use and handle HM to reduce the risk of spills, releases to the environment, and the unnecessary generation of HW and NRW.

d. Maintain all valves on containment structures in the closed and locked position except to drain rainwater. Inspect the quality of water prior to draining. If spill residue appears on or in the water take appropriate steps to collect the spill residue prior to draining. All excess water should be drained prior to operations in the area to minimize the waste potential in the event of a spill or release.

e. Ensure adequate spill response materials are maintained on hand at all areas where HM, HW, and NRW may be spilled. Equipment must be staged in such a manner that it is accessible to the scene of a spill immediately.

f. Secure all waste containers at the onset of Typhoon Condition III. Turn-in all that can be readily turned-in to DLA Disposition Services. The remainder shall be secured at hazardous waste storage areas or inside buildings.

7. Training

a. Managers, assistant managers, and handlers must successfully complete an appropriate training program prior to assuming those duties without trained supervision.

b. All personnel performing duties as prescribed in this enclosure must successfully complete hazardous waste annual refresher training.

c. Those authorized to sign waste manifests must maintain HM Shippers Certification training per DoD 4500.9 Defense Transportation Regulation (DTR) chap. 204 para. D.

d. Coordinate HM/HW management training with the Environmental Branch's CETEP Coordinator through the unit/activity training officer/S-3 as applicable.

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OPERATING FILE REQUIREMENTS

1. Generators shall establish and maintain an operating file that includes the following items.

a. A waste management plan, "Management of HWAP" attachment 1 of this plan is acceptable.

b. Copies of current references (this Plan, applicable portions of the Spill Prevention and Response Plan, POC Listings)

c. Current and previous letters of designation for HW managers, assistant managers, site managers/assistants, and handlers. (Keep for 5 years)

d. Copies of training records for all personnel requiring HW training. (Keep for 3 years after termination of duty)

e. Records and results of weekly and annual inspections. (Keep for 5 years)

f. Copies of HW/NRW turn-in documents. (Keep for 5 years)

g. A site specific spill contingency plan.

h. Profile sheets are not required to be held at the site, but each site should have a listing of waste streams that are generated and the profile number that matches that waste stream.

Note: Additional items associated with the management of the HWAP and associated materials may be added to the Operating File, but are not required.

All documents are not required to be located within one binder provided a locator sheet is present that indicates where records can be found.

GUIDELINES FOR WASTE IDENTIFICATION

1. Waste determinations are being accomplished at the Conforming Storage Area (HWSA #1031) as stipulated in Appendix 1 of the JEGS. HW profile sheets (DRMS Form 1930) will be processed and signed by the HWSA Manager.
2. Verification of accurate determination is performed by the Environmental Branch Hazardous Waste Program Manager and is certified by initialing and dating the signature block of the DRMS form 1930 (HW profile Sheet). This verification will be done prior to submission to the DLA Disposition Service representative.
3. HWAP Site managers requiring clarification on waste stream determinations should contact Environmental Branch for guidance.

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WEEKLY INSPECTION CHECKLIST

ウィークリー点検チェックリスト

Inspector's Name : 氏名		Inspection Date / Time 点検年月日 / 時間							
And Bldg 及び建物		D 日付:		D 日付:		D 日付:		D 日付:	
		T 時間:		T 時間:		T 時間:		T 時間:	
		YES はい	NO いいえ	YES はい	NO いいえ	YES はい	NO いいえ	YES はい	NO いいえ
1. Does the area appear to be clean and well maintained? 現場域は清潔、且つ維持管理が行き届いているか。		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is there evidence of spills or leaks? 流出或いは漏洩 (表面の染み、染み込み、液溜まり) の形跡はあるか。		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Are there any containers unsuitable for waste accumulation? 廃棄物の集積に不適切な容器は使われ ていないか。		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are containers in good condition without severe dents, rust, damage, duck tape or bulges? 容器にはひどい凹 み、錆、損傷、ダックテープ、膨張もなく良好な状態 か。		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Are all containers closed with lids, rings, bolts and bungs except when necessary for adding waste? 廃棄物 を入れる時以外は、全ての容器の蓋、リング、ボルト及 び栓は締めてあるか。		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Are all containers properly marked and/or labeled indicating contents, hazard class, HWAP#, Profile # and ASD when applicable? 全ての容器には内容物、ハザー ド、危険廃棄物集積地番号、プロファイル番号、 必要に応じ廃棄物集積開始日 (ASD) を示す適切なマー キングと、或いはラベル 表示がしてあるか。		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Are HW's segregated when incompatible? 不適合な (性状の合わない) 廃棄物どうしは適切に隔離して保管 されているか。		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Are all ignitable or combustible accumulation containers properly grounded during collection or transfer of contents? 全ての発火性、可燃性液体を収 集、或いは内容物を移しかえる際、それらを集積する容 器は適切にアースされているか。		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Is there in excess of 55 gallons present for each HW stream? それぞれの危険廃棄物で一種類につき 55 ガロ ンを超えて保管されていないか。		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Is sufficient spill response equip. readily available? 十分な流出事故対応用具や機器が備えてあるか。		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11. Are fire extinguishers serviceable? (HWSA only) 使用 可能な消火器は備えてあるか。 (HWSA のみ適用)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Is the eyewash and/or shower station serviceable? (if required) 非常用の洗眼器、またはシャワー設備は正 常に機能しているか。 (必要に応じ)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. Are secondary containment drain control valves closed at all times except when to drain accumulated liquid? 溜まった雨水を排水する場合を除き、ド レインコントロールバルブは常に閉めてあるか。		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ENVIRONMENTAL DIVISION INSPECTION CHECKLIST (ANNUAL)

Activity: _____ Site: _____
Manager: _____ Asst. Manager: _____
Inspector: _____
Date Inspected: _____ Time: _____

Note: A "No" identifies corrective action required. Each question is correlated to the requirements of the MCAS Iwakuni, Japan Hazardous waste Management Plan.

I. Administrative Requirements

a. Does the unit/activity have a hazardous waste manager designated in writing? (Para 2.3.9.1)

Yes/No

b. Does the unit/activity maintain a current operating file that contains: (attach. 3)

(1) A current list of unit authorized HWSA/HWAP?

Yes/No

(2) A HW management plan?

Yes/No

(3) A current copy of required references?

Yes/No

(4) Current and previous letters of designation for the HW manager, assistant manager, site managers, and handlers?

Yes/No

(5) Training records of hazardous waste training for all managers, assistant managers, and handlers for the previous three years?

Yes/No

(a) Have the managers and assistants attended the HW/HM management course? Dates: _____

Yes/No

(b) Have the managers and assistants attended the annual refresher course?
Dates: _____

Yes/No

(1) Do these site managers have appropriate training? (attach (1) para 6.)

Yes/No

h. Are accumulation and storage containers in good condition, free from severe rusting, and bulging or structural defects? (attach (1) 3a)

Yes/No

i. Do containers holding hazardous and/or other waste meet the applicable transportation regulatory packaging requirements (i.e., POP)? (attach (1) 3a)

Yes/No

j. Are accumulation containers, including overpack containers, compatible with the materials stored? (attach (1) 3b)

Yes/No

k. Are appropriate containers being used for the amounts and rate of generation to ensure timely turn-in of waste? (General knowledge)

Yes/No

l. Are containers closed except when it is necessary to add or remove waste? (attach (1) 3c)

Yes/No

m. Are containers holding waste being opened, handled, or stored in a manner to prevent the rupture of a container or cause it to leak? (attach (1) 3d)

Yes/No

n. Are containers properly marked with the bilingual "Hazardous Waste" or "Non-regulated Waste" markings as appropriate? (attach (1) 3e/f)

Yes/No

o. Are the contents of the container marked on them? (attach (1) 3e/f)

Yes/No

p. Are the containers labeled with the appropriate hazard class label when required? (attach (1) 3e/f)

Yes/No

q. Do the container labels include the HWAP# and Waste Profile# across the top? (attach (1) 3e/f)

Yes/No

r. Are containers turned-in to the appropriate HWSA within the required time frame when full? ((attach (1) 4a)

Yes/No

e. Is there an alarm system capable of providing immediate emergency instruction?
(attach (2) 1f)

Yes/No

f. Is there an intrinsically safe telephone or two-way hand-held radio system in use?
(attach (2) 1g)

Yes/No

g. Are portable fire extinguishers, fire control equipment, spill control equipment, and decontamination equipment available at the site? (attach (2) 1h)

Yes/No

h. Is there water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray systems? (attach (2) li)

Yes/No

i. Is Personal Protective Equipment (PPE) appropriate to the materials stored on hand and an eyewash and shower facility readily available if required? (attach (2) 1j)

Yes/No

j. Is periodic testing and maintenance being performed on all communications, alarm systems, fire protection equipment, spill control equipment, and decontamination equipment? (attach (2) 1k)

Yes/No

COMMENTS:

[illegible]